

# OXFORD GREEN BELT NETWORK

(Chairman: Dr Ian Scargill, email: [chairman@oxfordgreenbelt.net](mailto:chairman@oxfordgreenbelt.net) )

## SPECIAL NEWSLETTER September 2011

As usual this Newsletter is sent to Parish Councils and Parish Meetings with an interest in the Oxford Green Belt (via the Clerk or Chairman), as well as to other amenity groups. We would be grateful if it could be circulated amongst members and to any others who might be interested.

Although it is only a month since we sent round our last Newsletter, the Committee of the Oxford Green Belt Network decided that it was important to alert our Green Belt friends to the threats to the Green Belt in the government's proposed National Planning Policy Framework (NPPF). The Draft NPPF was discussed at a meeting of our Steering Committee on 8<sup>th</sup> September and we set out below our criticisms and fears. We are also suggesting what you might do if you agree with us. Please see the section at the end which gives details of how to go about this.

Despite Government assurances that the Green Belt (as opposed to the countryside in general) will not be weakened, this to our mind is frankly incredible given the changes that are being proposed to planning policy, details of which are to be found in the paragraphs below. We believe that protection of the Green Belt will be weakened by the adoption of NPPF in place of the existing planning guidance, and we find support for this conclusion in the Government's own Impact Assessment on NPPF which recognizes that there could be greater development in, and loss of, Green Belt.

### Why we are critical of the NPPF and why we think the Green Belt and its villages will suffer

1. Overall the NPPF reflects the Government's growth agenda. It contains a presumption in favour of sustainable development when considering planning applications. As a result, the relationship between planning law, which requires planning applications to be determined in accordance with the development plan, and government policy, which gives a presumption in favour of sustainable development, is unclear and is likely to give rise to speculative planning applications.
2. The NPPF is intended to replace all the existing planning guidance notes on which we, like professional planners, have relied on for advice. The proposed new document is brief and very general. The Green Belt section, which replaces the very helpful planning guidance document on Green Belts (PPG.2), has been reduced to a few short paragraphs. Shortening the advice in this way will make it more difficult to defend the Green Belt because everything is so open-ended compared with the old guidelines.
3. An example of the above is the omission of the important statement in PPG.2 that "the quality of the landscape is not relevant to the inclusion of land within the Green Belt or to its continued protection". Without this statement, the quality of the Green Belt landscape will suffer and landowners will be encouraged to allow their land to deteriorate in the expectation that it will be easier now to get planning consent.
4. Another omission is any mention of park and ride, helpful guidance on which was added to PPG.2 a few years ago since the car parks are often in Green Belt locations. Now we have only a statement in the Green Belt section of NPPF to the effect that local transport infrastructure that can demonstrate a requirement for a Green Belt location is acceptable. This is typical of the general way

in which advice is now expressed, implying, as other critics have suggested, that most things are now permissible.

5. A major worry is that villages currently “washed over” by the Green Belt (i.e. which are in every respect part of the Green Belt), will be taken out of the Green Belt altogether. This is because the NPPF states that a village whose character does not contribute to the openness of the Green Belt should be excluded from it. At present a number of villages, or the principal parts of them, are excluded from the Green Belt. In technical terms they are “inset villages”, i.e. are inset in the Green Belt rather than being washed over. These villages are Kidlington, Yarnton and Begbroke in Cherwell District; Cumnor, Appleton, Wootton, Kennington and Radley in the Vale; and Wheatley in South Oxfordshire. If advice in the NPPF is followed, a lot more villages are likely to be excluded from the Green Belt, leaving the Oxford Green Belt looking like a piece of Gruyere cheese, full of holes. It will be easier for developers to get permission to develop in all these excluded villages, and the emasculation of the Green Belt in this way will seriously undermine its whole purpose and make it hardly worth having a Green Belt at all. The situation is made worse by the advice which NPPF gives about redrawing boundaries whenever new plans are produced. We urge Parish Councils and Parish Meetings to consider carefully what paragraph 141 in the Draft NPPF could mean for your village. We believe all are at risk, but some may be particularly vulnerable, for example where development pressures are high closest to Oxford (Horspath, Garsington), where there are already plans to exclude (Berinsfield), or where the village is split by the Green Belt boundary rather than being wholly included within the Green Belt (Bladon, Bletchingdon, Weston-on-the-Green, and several to the south east such as Tiddington, Little Milton, Stadhampton and Warborough).

6. Another worry is over the redevelopment of buildings in the Green Belt. We fully appreciate that there can be changes of use, that buildings may be added to and, in the right circumstances, that new ones might be built, especially affordable houses. The existing PPG.2 gives useful advice on such matters, but the NPPF is much more permissive on changes. In particular, what applied to “dwellings” is now extended to all “buildings”. This will make it easier to replace or extend almost anything in the Green Belt, for example to convert barns to offices, weakening the old controls. This more permissive approach is also more likely because, in the case of re-use of rural buildings and in the advice on “major developed sites” (now extended to all sites) the detailed guidance criteria that were so helpful have been omitted.

7. In deciding what should or should not be allowed in a Green Belt, we have relied heavily on the definition of “inappropriate development” as it is explained in PPG.2. There has always been a presumption against inappropriate development in the Green Belt. However, the NPPF refers to “substantial weight” being given to circumstances that might harm the Green Belt which we consider to be a weakening of the whole idea of what is to be allowed and what is not. Just how are we to assess “substantial weight”?

8. There is a new statement in the NPPF which gives carte blanche to development brought forward under a “Community Right to Build Order“. This is all part of the emphasis on Localism in government policy, but it remains to be seen who will be responsible for these Orders and the plans that lie behind them. We believe that the development lobby will have a disproportionate say on what goes into Neighbourhood Plans and that the latter will be business-led rather than community-led.

9. Another part of the NPPF, not in the Green Belt section but with implications for the Green Belt, relates to the so-called “sequential test”. This requires developers who want to build new shops etc to consider a city centre location first, then edge of centre and suburbs, before finally considering out-of-town. The test is intended to remain for shops but has been dropped for offices. The consequence

of this is that it will be much easier to build office or business parks on the fringes of towns, with obvious implications for those places like Oxford which have a Green Belt that is intended to prevent just this kind of sprawl. We shall see more empty office blocks in the centre and huge pressure to build where there is easier access from the ring road. And villages will not be immune.

10. Abolition of targets for building housing on brownfield sites (currently 60% but often exceeded) makes it more likely that developers will look for sites on Green Belt land, especially where they have bought land speculatively or have options to buy.

### What we are suggesting you can do

In drawing attention to these threats to the Green Belt we are not seeking to cry wolf or to jump on a bandwagon of criticism. We are not a political body and we campaign only for the protection of the Green Belt because we believe that everybody benefits from it, town and country dwellers and business interests too.

The NPPF is out for consultation until 17<sup>th</sup> October. It can be read (and the Impact Assessment too) by going to the website of the Department for Communities and Local Government: [www.communities.gov.uk](http://www.communities.gov.uk). Responses can be made by email ([planningframework@communities.gsi.gov.uk](mailto:planningframework@communities.gsi.gov.uk)) or by post to NPPF, Department for Communities and Local Government, Eland House, Bressenden Place, London SW1E 5DU. Anyone can respond to the consultation, in whatever form you choose, and we urge all who have regard for the Green Belt to do so. You can also write to your MP if you share our concerns and it is always worth doing this since MPs will have to vote on the proposals in due course and meanwhile might be able to get some useful changes made.

Promoters of the National Planning Policy Framework refer a lot to sustainability. This greatly over-used term has become almost meaningless over the years. But when it was first used in the 1980s it referred to the importance of leaving the environment - from local to worldwide - intact for the benefit of future generations. If you wish to keep the Oxford Green Belt intact for the well-being of the generations to come, now is the time to act.