

## **Statement of OXFORD GREEN BELT NETWORK**

### **For Matter 2, The Strategy, Issue 5 THE GREEN BELT, on Wednesday 15 July**

#### Soundness

According to PPS.12 a Core Strategy, in order to be sound, must be justified on the basis of credible evidence. The Oxford Green Belt Network finds the Green Belt part of the Core Strategy lacking in justification and believes that it cannot on any account be regarded as robust. In Section 1.3 (Issues and Challenges), for example, the Green Belt is portrayed as a constraint which stands in the way of development. The material on Green Belt also appears in a section devoted to regeneration and the use of previously developed land, not in its own right. We suspect in all this a lack of commitment to the aims and purposes of the Green Belt.

Apart from the 5 purposes of a Green Belt, which is basically what is said in PPG.2, the only justification offered is a reference to the importance of the river corridors. There is no reference here to the green backcloth to Oxford afforded by the nearby hills and to the importance of views inwards to the historic city and outwards towards these hills. There is reference to views in a later section of the Core Strategy (under Urban Design etc) but the importance of the flanking hills to Oxford's character and setting should receive attention under Green Belt since it is the latter that protects them and it is here that evidence should be set out in support of a Green Belt policy. Likewise we would wish to see reference made to the valuable role which the Green Belt plays in providing opportunities for access to open countryside and for outdoor sport and recreation, a factor which is important in maintaining public support for the Green Belt and which therefore provides further essential support for a Green Belt policy.

We find Policy CS.4 (Green Belt) weak and imprecise in its reference to maintaining only the "general extent" of the Green Belt and of withholding planning permission for inappropriate development without reference to other qualities such as openness and visual amenity. Policy NE.2 of the City's current Local Plan includes, for example, a reference to ensuring that visual amenity is not harmed by development within, or conspicuous from, the Green Belt, and this has helped to protect the views of Oxford, as was the case at the inquiry into the University book depository. We would prefer CS.4 to be rephrased: "The present extent of the Green Belt will be maintained. Within the Green Belt, planning permission will not be granted for inappropriate development, in accordance with national policy, or for development that would result in reduction of openness or harm the visual amenity of the Green Belt."

#### The Questions

##### Should a more general review have been undertaken?

Not of the Green Belt, but more consideration could have been given to alternative strategies for meeting housing and other needs that did not require land to be taken out of the Green Belt. There is a danger, once the principle of reviewing the Green Belt has been accepted, that there will be many attempts to promote further areas within it for growth. Evidence that other attempts at reviewing the Green Belt would follow is to be found in the very large number of sites put forward for possible future development when District Councils have carried out their "site allocations" exercises. Much of the Green Belt is vulnerable to these development pressures as owners and

developers seek to capitalise on the huge increase in land value that would follow if sites were released from the Green Belt. It is our understanding that options to buy exist on many such sites. This is why we are strongly opposed to any review of the Green Belt and contend that needs should be met without incursions into the Green Belt.

What is meant by a “small scale review”?

We assume it means whatever the City Council chooses it to mean. The term is imprecise, open-ended and gives no guidance as to what the Council has in mind.

Why is this necessary?

We regard it as unnecessary since our preference is for development on non-Green Belt sites, either within the city or outside the Green Belt.

Would this create unnecessary uncertainty?

Undoubtedly it would and is doing so now. The Oxford Green Belt Network works closely with parish councils and local communities and there is no question that they feel under threat. The Green Belt only works if it enjoys a degree of permanence and it should not be treated as a convenient land bank for a local authority to draw upon when it decides it would like to do so.

The Core Strategy states that both the Northern Gateway AAP and the Site Allocations DPD will consider possible reviews. Who knows what they, particularly the Site Allocations DPD will reveal? There is great uncertainty over this and in our opinion the City Council should not be given carte blanche in this way in order to do as it chooses in the future. The Cherwell Valley would seem to be particularly at risk in connection with the Site Allocations DPD.