

## SODC LOCAL PLAN 2034 – EXAMINATION IN PUBLIC

### HEARING STATEMENT – Ginette Camps-Walsh

On behalf of

#### Beckley and Stowood Parish Council and Beckley and Stowood Neighbourhood Plan Steering Committee

#### **Matter 6 Does the plan take a sound approach towards Green Belt and other environmental constraints?**

##### Summary

The Local Plan is considered to be unsound. The Spatial Strategy proposes strategic sites in the Green Belt in preference to those outside it and rejected sites not in the Green Belt. The Strategy has no regard for the environment, will result in increased pressure for public access to important protected areas of environmental protection (SSSIs) and will increase pollution significantly in areas around Oxford that are already highly polluted.

NAT09 Green Belt Assessment of Strategic Sites in South Oxfordshire prepared for SODC by LUC in December 2018 completely ignores previous detailed reviews on the strategic sites in the Green Belt and that great harm will be done to the Green Belt at a number of the proposed strategic sites. These are shown in the Site Selection Paper TOP 6.1 on a map in Appendix 10 HARM RATINGS FOR GREEN BELT REVIEW STUDY - In the same paper the previous Appendix 9 – SITE BOUNDARY ALTERATIONS DESCRIBED also shows that where new Green Belt boundaries are required for strategic sites that these have not yet been decided and all require “completion of detailed appraisals”. This has not been carried out. For a number of sites there is no other appropriate Green Belt boundary as these should, as stated in paragraph 139 of the NPPF be physical features that are readily recognisable and likely to be permanent, such as a river or stream.

A number of SSSIs would be at high risk from developing the Green Belt sites around Oxford e.g. Sidlings Copse and College Pond.

#### ***Issue a. What are the strategic level exceptional circumstances for the release of this quantity of land from the Green Belt? (The local level circumstances will be dealt with under each of the strategic sites.)***

South Oxfordshire District Council in the preparation of the Local Plan (submission document) state that the exceptional circumstances to release land from the Green Belt is to meet the unmet housing need for Oxford City.

In the Local Plan for Oxford City (2036) it is stated that:

1.34 There is not the capacity within Oxford’s administrative boundary to meet all housing need. As far as possible, *this need should be met within Oxford or very close to its boundaries*, as this will enable new development to be connected to areas of employment and other facilities by sustainable modes of transport. *Any urban extensions to Oxford will therefore be well integrated into the city* and will maximise the benefit of existing infrastructure. Discussions with the other Oxfordshire districts regarding Oxford’s unmet housing need are progressing positively; three of the neighbouring districts

have agreed to accommodate an element of this need and are progressing with their own Local Plan reviews to facilitate this. The next stage is to work collectively across the county in the production of the Joint Strategic Spatial Plan which will identify broad areas for the accommodation of growth in the next round of Local Plans (*Italics author's emphasis*).

This is considered to be an attempt to extend the boundaries of Oxford City into the countryside, perhaps as part of an empire expansion programme. In the Beckley and Stowood Neighbourhood Plan survey 66% of respondents said that they needed to be protected from being part of Oxford.

The justification for the release of Green Belt land includes the opportunity to provide sustainable modes of transport options. This relies on:

- Increased bus services
- Increased opportunities for cycling
- Increased opportunities for walking

Bus service provision will rely on an existing congested road network, which is 'above capacity'.

Cycling is not popular during inclement weather and has restrictions. There are a number of cycling schemes within Oxford City. The latest of these supported by Oxfordshire County Council, "The Oxford Local Cycling and Walking Infrastructure Plan" does not extend beyond the ring road and there is no co-ordinated approach to a sustainable transport system to serve communities outside the ring road.

Walking into Oxford requires a safe crossing of the ring road. There are few such around the ring road. Footpaths and bridleways which previously went into Oxford have been cut off by the ring road.

There are not considered to be any exceptional strategic level circumstances for the release of Green Belt land, particularly of the recently proposed site allocations within the Green Belt around Oxford. The Spatial Strategy promotes sites within the Green Belt due to their proximity to Oxford City. However, this approach appears to deliberately oppose the strengthening of the Green Belt as supported within the NPPF. It is considered that there are many other more sustainable sites which are not in the Green Belt which can be used – 7 other potential strategic sites rejected on inconsistent and conflicting grounds and the fact that they are not near Oxford in the Green Belt e.g. Harrington, Play Hatch – Reading, Land off Thame Road - North Weston, Hagbourne Fields - Land South of Great Western Park, Palmers Riding Stables, Reading Golf Club, Land adjacent to Thornhill Park and Ride – the only other Green Belt site.

**Issue b. Have the Council adequately addressed the points in paragraph 137 of the NPPF in respect of the use of brownfield land, development density and inter-authority discussion?**

**Brownfield land** - SODC has not addressed paragraph 137 of the NPPF at all, in any respect. It has deliberately proposed through the Spatial Strategy the requirement of strategic sites to be near Oxford and therefore in the Oxford Green Belt. The reason provided is that Oxford City says it wants exported 'unmet' housing need to be near Oxford. There is brown field land available in some of the 7 rejected sites and elsewhere e.g. Didcot Power Station site, but these were not considered near to Oxford.

**Density** - Increasing the density of development in general would obviously reduce the land requirement and the need to remove land from the Green Belt, to meet housing provision. This has not been assessed or addressed by SODC.

**Inter- authority Discussion** - It is suggested that meeting Oxford's 'unmet' housing need could be adequately addressed by development along the railway lines into Oxford as this is the only mode of sustainable commuting into Oxford. There is no evidence that SODC has even attempted to discuss this with Oxford or Local Authorities on the railway routes

- Chiltern line to Bicester, Princes Risborough, Aylesbury etc,
- The GWR route to Charlbury, Moreton-in Marsh etc
- The Cross Country towards Banbury and Birmingham and Didcot, Reading and Basingstoke.
- In the future the completion of the Oxford – Milton Keynes- Cambridge Arc rail link will also allow commuters to access Oxford along this route.

**Issue c. Does the plan adequately allow for compensatory improvements for the loss of Green Belt in line with NPPF paragraph 138?**

There is no compensatory improvements or consideration of *“the need to promote sustainable patterns of development”* or *“compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*

**Issue d. Do the presence of Green Belt and other environmental constraints indicate a need for a reduced housing requirement?**

The housing requirement for South Oxfordshire includes some of the unmet need identified for Oxford City. The lack of available land within the city limits has resulted in land being promoted close to the edge of the city, outside the ring road. The sites selected are on land within the Oxford Green Belt, with the Green Belt currently benefitting from defined defensible boundaries. The release of these sites from the Green Belt will be in direct conflict with the purposes of the Green Belt (identified in paragraph 134 of the NPPF). This level of proposed release from the Green Belt will be detrimental to the character of the countryside and adversely affect the setting of the historic city. It is therefore considered that the housing requirement should be reduced to protect the Oxford Green Belt.

Conclusion to Matter 6

For the reasons provided above, it is considered that the Local Plan is not sound. The plan has not been positively prepared and is not justified. The inclusion of strategic housing allocation sites on Green Belt land has ignored expert advice in respect of the harm to the Green Belt. The failure to properly consider brownfield land, increase densities on non-Green Belt sites and consider a reduction in housing number requirements will detrimentally harm the Green Belt and be at odds with the functions of the Green Belt set out in the NPPF (paragraph 134).