

February 2018

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Dear Councillor,

At the Council meeting on 26 February, you are due to vote on the Proposed Submission Plan for the [Local Plan 2011-31 Partial Review](#) which includes proposals for nearly 4,000 houses in the Oxford Green Belt to cater for Oxford City's 'unmet need'.

We strongly urge you to vote against the submission of this Plan.

1. Oxford has not been pressed to, and has not attempted to, justify these numbers or show how many of these houses it could accommodate itself. It would be reckless and irresponsible for Councillors to agree to take them unless they were sure they were a. needed and b. Oxford could not accommodate them. CPRE can show that Oxford could accommodate most if not all of its stated housing need by prioritising land for housing rather than more job creation, and building at the higher densities appropriate to cities. The Cherwell LP Part 1 Review should at the very least be held in abeyance until after Oxford's Local Plan has been completed.
2. Even if the need existed, it is NPPF (National Planning Policy Framework) and Government White Paper Policy that the Green Belt should be protected.
3. The notional "unmet need" arises only from the SHMA (Strategic Housing Market Assessment) and the SHMA itself does not expect its requirements to be met if it involves using Green Belt. In any case the SHMA is not an obligation. The Council chose to adopt it but they could also unadopt it any time they liked, particularly on the basis of the Government's new Objectively Assessed Need methodology.

Pressing ahead would set a worrying precedent for the acceptance of Oxford expansion and will impact on future growth targets across the whole of the District. It would be inconsistent with national policy, especially on protection of the Green Belt, and would not reflect the wishes of local residents.

Our attached briefing note sets out this information in more detail. Would you be willing to meet with us ahead of the meeting to discuss a more sensible and sustainable way ahead?

On February 26th, you can make a difference - please ask your officers to wait for the outcome of Oxford City's Local Plan process before sacrificing Cherwell villages and Green Belt to meet an unproven need.

Yours sincerely

Helen Marshall
Director, CPRE Oxfordshire

CPRE Oxfordshire Briefing Note to Cherwell Councillors Cherwell Local Plan 2011-31 Part 1 Review Proposed Submission Plan

We understand that this Plan will be brought to Council on 26 February for approval for submission to the Planning Inspectorate.

The Plan outlines the Council's proposal to build an additional 4,400 houses for the district by 2031, *over and above that allocated in the adopted part of its Local Plan, 3,990 of which are proposed in the Green Belt* between north Oxford and Kidlington, in what is known as the 'Kidlington Gap', and between Kidlington and the rural villages of Begbroke and Yarnton.

We strongly urge you to vote against the submission of this Plan.



CDC LP Part 1 Review - Proposed housing allocation sites within the Oxford Green Belt

1. If pursued, this Plan would set a worrying precedent for the acceptance of Oxford expansion and will impact on future growth targets across the whole of the District.

The Local Plan Review is intended only to accommodate Oxford's "unmet need" for housing. But not only is Oxford's total housing need substantially overstated, Oxford has not yet satisfactorily identified the amount of it they might not be able to meet. In CPRE's view Oxford is capable of accommodating all or almost all of it by switching land earmarked for businesses to housing instead.¹ *It is therefore premature for Cherwell to even start the process of accommodating it.*

¹ See CPRE Oxfordshire's response to Oxford Local Plan Preferred Options consultation - <http://www.cpreoxon.org.uk/news/item/2636-oxford-local-plan-see-cpre-s-consultation->

You may have been told that the Inspector of the Cherwell Local Plan Part 1 insisted that the Review should take place within a certain time, and that the District is now under an obligation to act quickly to meet Oxford's requirements. However, this is not the case.

The Inspector's condition, that Oxford's unmet need should first be "fully and accurately defined" has not been completed, and it is entirely possible that there will be little or no 'unmet need' for other Authorities to consider. In any event, a "working assumption" of need cannot be an exceptional circumstance justifying Green Belt release, especially when it is likely to be extremely inaccurate. The Adopted Cherwell Local Plan Part 1 clearly states that it will work to accommodate Oxford's unmet need 'if Oxford is unable to accommodate the whole of its new housing requirement for the 2011-2031 period within its administrative boundary' (our emphasis). This situation is not yet proven to be the case.

2. As proposed, the Plan is inconsistent with national policy, especially on protection of the Green Belt.

The Council's Local Plan Review is not just to build in the Green Belt, but to attack the core principles on which all Green Belts depend. Even if Oxford's inability to accommodate its own housing need was real and had been properly quantified the Council could and should meet it elsewhere than in the Green Belt.

Government policy requires development in the Green Belt to be the very last resort, only to be considered if there is no alternative. In its Partial Review, Cherwell has stood that Policy on its head by making building in the Green Belt its very first choice, rejecting what it accepts were reasonable alternatives. Cherwell says that building as close to Oxford as possible trumps all other considerations. Since Oxford is surrounded by Green Belt, that has led the Council to select not just Green Belt sites, but the very closest Green Belt sites to the City to build on, ie., at the 'Kidlington Gap', where the Green Belt is most fragile - just a few fields wide. This is flatly contrary to Green Belt policy.

The Plan would also cause the merger of the rural villages of Begbroke and Yarnton into Kidlington and expose Kidlington itself to being engulfed by Oxford. This contravenes both Green Belt Policy and Cherwell's Local Plan Part 1 regarding the coalescence of the villages.

Indeed, by declaring that proximity to Oxford itself is an exceptional reason to build on the Green Belt which surrounds the City, the Council is fundamentally undermining its very purpose, risking opening the whole Green Belt to future development.

CPRE is opposed in principle to the release of Green Belt land - as is the National Planning Policy Framework (NPPF, chap 9, paras 79-88). A very strong case therefore has to be made to establish the exceptional circumstances required for the release of Green Belt land (NPPF Para 88). The Cherwell Plan goes nowhere near making such a case.

[response?highlight=WyJveGZvcmQlLCJveGZvcmQncyIsIidveGZvcmQlLCJveGZvcmQnliwibG9jYWwiLCInbG9jYWwiLCJwbGFuIiwjJ3BsYW4iLCJwbGFuIjIsInBsYW4ncyIsInBsYW4nLiIsIm94Zm9yZCBsb2NhbCIsIm94Zm9yZCBsb2NhbCBwbGFuIiwibG9jYWwgGxhbjJd](https://www.cpre.org.uk/response?highlight=WyJveGZvcmQlLCJveGZvcmQncyIsIidveGZvcmQlLCJveGZvcmQnliwibG9jYWwiLCInbG9jYWwiLCJwbGFuIiwjJ3BsYW4iLCJwbGFuIjIsInBsYW4ncyIsInBsYW4nLiIsIm94Zm9yZCBsb2NhbCIsIm94Zm9yZCBsb2NhbCBwbGFuIiwibG9jYWwgGxhbjJd)

3. The Plan does not reflect the wishes of local residents.

The response to the consultation on the Local Plan was overwhelmingly opposed to these proposals.

This is also in line with the views of Oxfordshire residents as a whole, who are overwhelmingly in favour of maintaining the permanence and openness of the Green Belt. A pan-Oxfordshire survey conducted by Alpha Research on behalf of CPRE Oxfordshire found that 76% of residents wished to see the Green Belt remain undeveloped.²

WHAT ARE THE ALTERNATIVES?

We believe there are a number of reasonable alternatives. The houses to satisfy Oxford's "unmet need" targeted at the Cherwell Green Belt could not only, on the Council's own admission, be sustainably built elsewhere in the district at other sites, or by increasing the density of build on existing sites, but also, at least to a considerable extent, within Oxford City itself.

- *Ensuring that Oxford's unmet housing need figures are genuine* - CPRE research indicates that Oxford could meet at least 26,000 of its 28,000 'need' over the Plan period within its own boundaries, by building at appropriate densities and prioritising available land for housing rather than employment. *Why should Cherwell be under pressure when the City has not yet had its own plans approved at an Examination in Public?*
- *Building at higher density* - higher density targets would enable better use of scarce land resource, generate more sustainable communities and help provide the more affordable housing that people actually need.³
- *Re-visiting the figures based on the new proposed Government methodology* for calculating housing numbers (Objectively Assessed Need - OAN), which would lead to a dramatic decrease in the targets for Cherwell and Oxford. The current figures are *not* about providing for local people in need of housing, but looking towards future hypothetical growth. This new formula, if adopted, would reduce Oxford's total annual housing need from a SHMA mid-point of 1400 per annum to 746, that is by 47%. This would in turn reduce "unmet need" by two thirds, even before taking into account the points made above. The new OAN is at the very least further evidence that the level of unmet need this review seeks to satisfy is neither fully nor accurately defined.
- *Asking other Councils to co-operate in meeting the unmet need* - Cherwell itself has indicated that there are sustainable sites elsewhere in the District, outside of the Green Belt. However, if there were genuinely no other available option, national policy indicates that Cherwell would not be expected to release its Green Belt but to explore alternative options with its neighbours under the Duty to Co-operate.

² <http://www.cpreoxon.org.uk/news/item/2447-cpre-survey-shows-majority-don-t-want-to-build-on-green-belt?highlight=WyJncmVlbilslmdyZWVuJyIsIidncmVlbilslmJlbHQiLCJiZWx0JyIsImJlbHQnLCIsImJlbHQnLiIsImJlbHQncyIsInN1cnZleSIsImdyZWVuIGJlbHQiLCJncmVlbilBiZWx0IHN1cnZleSIsImJlbHQgc3VydmV5IiI0=>

³ See CPRE Oxfordshire's Density Guidelines - <http://www.cpreoxon.org.uk/news/current-news/item/2535-how-densely-should-we-build?highlight=WyJkZW5zaXR5IiwidmVpZGVsaW5lcyIsImRlbnNpdHkgZ3VpZGVsaW5lcyJd>

In conclusion, this Plan would irrevocably damage the Oxford Green Belt, lead to the coalescence of key Cherwell settlements and set a dangerous precedent for the level of future development that Cherwell may be expected to accommodate. Yet these decisions are being taken prematurely, before Oxford's need is fully tested, and without taking adequate account of viable alternatives, national policy or the wishes of local residents.

On February 26th, you can make a difference - please ask your officers to wait for the outcome of Oxford City's Local Plan process before sacrificing Cherwell villages and Green Belt to meet an unproven need.

ENDS

You can read CPRE Oxfordshire's full response to the Consultation on the Local Plan Part 1 Review here: <http://www.cpreoxon.org.uk/news/item/2634-cherwell-district-local-plan-partial-review-cpre-s-initial-comments-and-recommendations?highlight=WyJjaGVyd2VsbCIsImNoZXJ3ZWxsJ3MiLCJsb2NhbCIsIidsb2NhbCIsInBsYW4iLCIncGxhbIsInBsYW4nIiwicGxhbidzIiwicGxhbiculiwiY2hlcndlbGwgbG9jYWwiLCJjaGVyd2VsbCBsb2NhbCBwbGFuliwibG9jYWwgcGxhbiJd>

If you would like to discuss the contents of this briefing or would like further information, please do get in touch.

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