



## OXFORD GREEN BELT NETWORK

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Mr Chris Skidmore MP  
Room 20 - Norman Shaw North  
House of Commons  
London SW1A 0AA

Dear Mr Skidmore,

18<sup>th</sup> December 2013

### **All-Party Parliamentary Group on the Green Belt**

I am writing to you on behalf of the Oxford Green Belt Network (OGBN) in your capacity as Contact for the above Group. OGBN was set up in 1997, a joint initiative of CPRE Oxfordshire and the Oxford Preservation Trust, and works closely with the 60 or so parish councils in the Oxford Green Belt to support the purposes of the Green Belt and to make its benefits more widely known. We understand that your Group is collecting evidence on how the Green Belt is protected and our object in writing to you is to provide some evidence as it relates to the Oxford Green Belt. We understand that you wish to focus on certain questions and our evidence is therefore provided under these headings.

#### **What has been the effect of the abolition of Regional Spatial Strategies and the introduction of the National Planning Policy Framework in the context of the preservation of Green Belt land?**

Since the South East Regional Strategy proposed a boundary review of the Green Belt to allow an urban extension to the south of Oxford, a proposal which the Government then withdrew after a challenge that sustainability had not been properly considered, its abolition reduced for a time the pressure for such an extension. However, it remains a wish of Oxford City Council to build such an extension, notwithstanding the fact that the proposed site is in South Oxfordshire. This demand is likely to be supported through the City Deal, and will be even more threatening if Mr Miliband's proposal, however well-intentioned, to let one Council impose its will on another is adopted.

The brevity of the Green Belt section of the NPPF has made it harder to protect the Green Belt since the written guidance is so much reduced and arguments must rely heavily on interpretations of a few key words such as "openness".

#### **Which local councils are taking their obligations on Green Belt preservation seriously and which local councils are placing Green Belt land under threat?**

The Oxford Green Belt is shared by 5 District Councils. Oxford City Council's expansionist ambitions present a real threat to the Green Belt, witness what happened after the City obtained an administrative boundary extension in the early 1990s and promptly drew up a new local plan, removing large areas of land from the Green Belt. The likelihood of the same thing happening again is increased by developments such as City Deal and associated growth strategies. The City presently has a boundary change request before the Commission, laying claim to a large slice of Green Belt in South Oxfordshire.

The other four District Councils are better disposed towards the Green Belt but that has not prevented some of them carrying out, or proposing, Green Belt reviews. This has happened recently in the case of South Oxfordshire at Berinsfield, whilst Cherwell is proposing reviews north of Kidlington and in the Begbroke area. The consequence of all this is a gradual loss of land to Green Belt purposes and protection.

The old County Structure Plan had a Country Towns Policy that involved sharing Oxford's growth potential with other parts of the County. It brought benefits to towns outside the Green Belt whilst reducing somewhat the pressure on Oxford's immediate surroundings. Such a County-wide policy should continue to be implemented in the interests of the Green Belt.

#### What new policy ideas should be considered to increase Green Belt protection?

Green Belts should enjoy the same level of protection as National Parks and Areas of Outstanding Natural Beauty instead of having an inferior status which leads to their being regarded by some local authorities as a convenient land bank to be drawn upon for future use (as in Safeguarded Land).

The NPPF provides too many, open-ended circumstances in which development in the Green Belt can be regarded as "not inappropriate". Examples are engineering operations, local transport infrastructure, and renewable energy projects. There is a need to be more explicit over what is unacceptable, e.g. solar farms.

#### Should brownfield land in Green Belt areas have the same protection as greenfield land in Green Belt areas?

It would be unwise to reduce further the protection of brownfield sites in Green Belts and the existing level of protection should not be changed. As it is at present, brownfield sites can be redeveloped under paragraph 89 of the NPPF and this provides sufficient freedom.

#### How can we increase local community engagement in protecting the Green Belt?

Neighbourhood Plans come to mind but in view of the inducements that are sometimes offered by developers it is important that Neighbourhood Plans should not be able to propose development in the Green Belt which is not in line with national guidance.

#### How do we balance the need to sustain the Green Belt with the need for sustainable communities?

The implication behind this question is that communities have to grow in some way. But they are always changing. The village shop might have closed and the bus service been reduced, but new families move in and support the village school whilst disused barns and other premises are converted to work-at-home units. So we don't see a particular problem in sustaining the Green Belt whilst at the same time accommodating change and sustaining local communities. In any case the need to maintain the Green Belt to serve wider purposes should be paramount.

#### Should certain areas of Green Belt land be given higher protection than other areas?

Our answer to this question is emphatically No. If you give higher protection to some areas of Green Belt land the inference is that other areas enjoy less protection and this makes them more vulnerable to development pressures. Developers will be very quick to pounce on areas with lower protection, claiming that they contribute less to Green Belt purposes and so may be sacrificed.

PPG.2 had a useful paragraph (1.7) which stated that the quality of landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection (one of the helpful ideas left out of the NPPF). The value of this point is that it makes it clear that all parts of the Green Belt are equally important in fulfilling its basic purposes, particularly those of preventing sprawl and encroachment on the countryside.

What should the Green Belt look like for the twenty first century?

We would hope that it would endure.

It is true that over the years the Oxford Green Belt has diminished in size owing to reviews carried out at various times, though admittedly to only a relatively small and localized degree when looked at as a whole. The answer, however, is not to add land on to the outer edge of the Green Belt in order to compensate for losses elsewhere. This defeats the object of the Green Belt which is to contain growth and prevent sprawl. The outer boundary of the Green Belt tends to follow roads, and it is the inner boundary, closest to the main built-up area, that is more crucial in allowing the Green Belt to serve its primary purposes. In the case of Oxford, where the inner boundary was very carefully drawn, the Green Belt not only prevents sprawl, but serves the additional very important purpose of protecting the historic setting of the City, a setting that is very easily damaged by insensitive development. We conclude that no further Green Belt land should be sacrificed, either on the edge of Oxford, or on its outer boundary which provides certainty and reassurance to local communities.

It should be noted that the Green Belt is also vulnerable because of changing farming patterns and because of the institutional ownership of land, significant in the case of Oxford. It thus calls for strong protection, including the retention and enhancement of its landscapes and the protection of its visual amenity and biodiversity as stated in the NPPF.

We were pleased to learn of the setting up of the APPG on the Green Belt and hope that our observations are of help.

Yours sincerely,

Dr D.I.Scargill  
On behalf of the Oxford Green Belt Network