

**Statement of OXFORD GREEN BELT NETWORK**

**for SOUTH OXFORD STRATEGIC DEVELOPMENT AREA AND SUMMERTOWN, on Tuesday 28 July**

Soundness

The Oxford Green Belt Network would argue that the South Oxford SDA does not meet the tests of soundness set out in PPS.12. We believe it fails the “Justified” test because insufficient attention has been given to reasonable, non-Green Belt, alternatives that could, for example, include a new settlement beyond the Green Belt. We would also question whether the City Council needs to build so many houses outside its boundary to meet its requirements. We believe it fails the “Effective” test because it does not address the requirement of how the necessary infrastructure will be provided and considerable uncertainty exists over how it might be delivered.

The Questions

What and how much should the Core Strategy say?

In view of the opposition of South Oxfordshire District Council to this scheme which is within South Oxfordshire, we think that the Core Strategy should not include it whilst the South East Plan is under legal challenge. It is our understanding that there are presently at least two challenges to the SDA before the courts.

How should the area be shown and what area should it cover?

It is difficult to answer this question because of the uncertainties surrounding the SDA. For example, the South East Plan refers to the SDA possibly including additional safeguarded land to ensure boundaries endure over the long term. This seems to us to be an open invitation to landowners to go on promoting sites for development and it is causing doubts and concern over a wide surrounding area to the south and east of Oxford. If the SDA were to go ahead its extent should be limited to the requirements of the 4,000 dwellings. It is the City Council’s claim that it is primarily affordable dwellings that are needed. The Council, as a major landowner, is in a position to make its land available at no cost for this purpose and should also be in a position to encourage its partners in the SDA to do the same. It should be specified, therefore, that all – or the overwhelming majority – of the houses should be affordable and at high density, at least 60 per hectare.

What should be said about potential nature and uses?

A major issue is whether or not the SDA should include employment. It has been described as a mixed development which implies that employment is to be included. But jobs bring a need for additional housing and a cycle of demand is thereby perpetuated. For this reason, it is our view that employment should not be included and that the development should be limited to meeting existing housing need. Otherwise the same kind of demands will keep recurring. In this connection, we suggest the City Council should not be using so much of the available land within its own boundary for employment when it is argued that the pressing need is for housing. This would reduce the need to take up Green Belt land for housing outside its boundary.

#### What should be said about impact on adjoining areas?

The Core Strategy's expressed wish is that the SDA should somehow be integrated with the Leys and other adjoining areas. But we question whether this can be achieved and fear that financial restraints will result in conflicts of interest between the Leys and the SDA over investment in services and community facilities. If this were the case it is possible that deprivation would be increased in the Leys rather than reduced as is the aim of the Core Strategy. Traffic congestion is also likely to increase there.

The Core Strategy fails to recognize the contribution which the countryside in this area south of Oxford currently makes to the people of the Leys and adjoining areas. Although there is a reference to managing the rural-urban fringe, the consequence of carrying out the SDA urban extension would be to cut these people off from their local countryside and in effect isolate them within the expanded urban area.

The Core Strategy does not take account of the impact which the SDA would have on nearby villages. It is not just Sandford-on-Thames and Garsington that would be affected (Oxford Park Homes would be engulfed), but others such as the Baldons, Horspath, Nuneham and even places such as Wheatley and Dorchester. One of the basic aims of Green Belt policy, as set out in PPG.2, is to preserve gaps between settlements, in this case Oxford and the villages to the south and east of Oxford. Its purpose is to protect village communities from the pressures that arise from close proximity to an urban area and we believe that the size and extent of the proposed SDA would have seriously negative consequences for these communities. It may be argued that it is no business of a Core Strategy to take account of these matters in another District, but we fail to see how this can be legitimately avoided if the Strategy is promoting development on this scale in that other District. The cuckoo that lays its egg in another bird's nest may not stop to consider the consequences but those consequences nevertheless follow, and it seems to us to be a denial of what planning should be all about for the Core Strategy to consider this SDA in isolation from its wider spatial consequences. So, Yes, if the SDA is to be included in the Core Strategy, it should include a full analysis of its implications beyond its built-up limits.

#### What should be said about transport impacts?

Transport impact should be fully recognized. Oxford has suffered for many years from traffic problems which are damaging to the historic core and to local areas within and beyond the city. It is insufficient to assume, as Policy CS8 does, that the SDA will be integrated with existing transport networks and infrastructure. Much more than this will be required if the SDA were to go ahead and the Core Strategy should address this issue also, otherwise one must assume that existing problems will get worse with increased traffic in the already built-up areas like the Leys and in the villages.

#### What should be said about how the project will be progressed?

PPS.12 requires this of a Core Strategy

Our recommendation: deletion of Policy CS8 (South Oxford Strategic Development Area) and all other references to the SDA from the Core Strategy.

## SUMMERTOWN

Identification of this area appeared in a Local Plan when planning authorities were encouraged to set aside land as “safeguarded”. The Oxford Green Belt Network has always been opposed to the removal of Green Belt status from this area which, whilst not in the floodplain, is an important part of the Cherwell Valley arm of the Oxford Green Belt. Developing it would result in this narrow strip of open space being reduced in size to the detriment of the meadows and of the wildlife that benefits from this green corridor.

It would therefore be our wish to see Policy CS9 (land at Summertown) removed from the Core Strategy for the above reasons.