



The Planning Policy Team  
South Oxfordshire District Council  
Crowmarsh Gifford  
Wallingford  
Oxon OX10 8NJ

Dear Planning Policy Team,

12<sup>th</sup> August 2008

### **South of Oxford Urban Extension**

Thank you for sending the Oxford Green Belt Network (OGBN) a copy of the July 2008 Consultation relating to the above. We remain opposed to the urban extension but we understand the requirement that has been placed on the District Council by GOSE and are therefore pleased to send you our comments.

We appreciate the covering letter from Councillor Paterson and are glad that the District Council's opposition to the urban extension is set out so unequivocally. For our part, OGBN will continue to oppose the urban extension and related review of the Green Belt, and we shall be responding in due course to the Consultation on the Government's Proposed Changes to the Draft South East Plan. Your Consultation reached us several days before the Government's Proposed Changes were announced but we take it that this does not affect what you are inviting us to do.

Our comments on the Issues and Options that you identify are set out below under your headings:

#### **Housing:**

Since we believe that the recommended 4,000 dwellings would result in the destruction of an important part of the Oxford Green Belt, we see no merit or potential in adding to this number.

#### **Areas of land to be removed:**

The aim of OGBN is to defend the whole of the Oxford Green Belt and to regard all parts of it as fulfilling the purposes of Green Belt policy as set out in PPG.2. This being the case it is difficult for us to express a preference for development in any one part of it; indeed we think it would be invidious to do so.

Bearing in mind the guiding issues you set out, we would say that any urban extension, if it were to be built, should be as close to the existing urban area of Oxford as possible. In line with advice in PPG.2, the choice of precise area should seek to preserve the important gaps between Oxford and nearby villages that would be most affected. Quality of landscape is not relevant to the purposes of the Green Belt and it

has been established in the County's Structure Plan that the whole of the Green Belt contributes to the setting of Oxford by minimising development pressures.

We are strongly opposed to the idea of allocating land beyond the outer boundary of the Green Belt in order to "compensate" for loss of a part of the inner Green Belt. This simply plays into the hands of Government who are able to claim that they are maintaining, or in their words "robustly protecting", the Green Belt by keeping the overall size the same. Nothing should be done to encourage this cynical and duplicitous approach and the District Council should just point to the loss of Green Belt that an urban extension would entail, stressing the particular significance of the inner, not the outer, boundary.

#### Employment:

The urban extension has been described as a mixed development which implies that employment is envisaged. OGBN is opposed to this. One of the arguments that one hears put forward by proponents of the urban extension is that it will reduce commuting into Oxford. Aside from whether this is a valid argument or not, the inclusion of employment in the urban extension will tend to increase inward commuting, or at least negate any of the supposed benefits of building housing to reduce travel to Oxford. If it is suggested that some of the new housing would be for those in the newly-created jobs, we would respond by saying that this would inevitably reduce the amount of affordable housing the urban extension is meant to supply.

It has always been OGBN's view that the growth of Oxford's employment potential should be shared with other Oxfordshire towns beyond the Green Belt and we do not see how the provision of any additional employment land on the edge of Oxford can do other than worsen, or at best not help, the jobs-housing imbalance that you observe.

#### Infrastructure and facilities:

Any new development clearly needs some community facilities but it is not just a question of identifying the threshold population commensurate with 4,000 dwellings and allocating an appropriate level of service provision. The needs of the existing population of Blackbird Leys and Greater Leys must be kept in mind in this context. It is our understanding that the City Council's emerging Core Strategy seeks to improve facilities in Blackbird Leys, but the fear has also been expressed that the urban extension might make it more difficult to carry out this policy. Looked at from another perspective, if the emphasis is on Blackbird Leys, the urban extension would risk becoming an under-serviced housing estate with the kind of social problems that are often the result of this kind of development. . So there is a balance to be struck if these difficulties are to be avoided and we are not in a position I am afraid to comment on how the dilemma can be resolved, if indeed it can.

#### Transport:

It is tempting to respond that you cannot avoid traffic impact of the development on surrounding villages and the approaches to Oxford, i.e. that there is an inevitability that existing problems will simply get worse. And it is not just the country and main roads since concerns have already been expressed to us about through traffic in Blackbird Leys.

When development is proposed the hope is always expressed these days that the need for car travel will be reduced. But it is not just about commuting; people use their cars for social purposes as well as for travelling to work. They have visitors and they require services that involve delivery and domestic repair vehicles. So vehicular traffic will grow. No doubt some measures can be implemented here and there to mitigate the impact, but we do not think that the resulting effects, whether on villages, the Leys, or the main roads, should be under-estimated.

Please let us know if you feel that we can be of any further help, either now or at a later stage, Meanwhile we wish the Planning Policy Team well in this unwanted task.

Yours sincerely,

D.I.Scargill  
Chairman, Oxford Green Belt Network