

## ***Cherwell Development Watch Alliance***

also signed by Layla Moran MP, parish council chairs, local District and County councillors, planning professionals and community groups as listed below.

Postal address: on request

Please reply by e-mail to:

**cherwelldwa@gmail.com**

Rt Hon Robert Jenrick  
Secretary of State for Housing,  
Communities and Local Government  
MHCLG,  
Fry Building, 2 Marsham Street  
London SW1P 4DF

By e-mail to: robert.jenrick@communities.gov.uk

11 May 2020

Dear Mr Jenrick,

### **Request for intervention in the Cherwell Local Plan Partial Review and the Oxford Local Plan in order to protect the Oxford Green Belt**

In these extraordinary times we appreciate that local planning may not be your top priority. Nevertheless, we have to write to you now because Cherwell District Council and Oxford City Council continue to work towards the adoption of the Cherwell Local Plan Partial Review and the Oxford Local Plan. If these two inter-related plans are adopted, large areas of the Oxford Green Belt will be developed, unnecessarily according to expert evidence, and lost forever. This is in direct contradiction to the Government's manifesto commitment to "protect and enhance the Green Belt" and to repeated statements by Government Ministers to the same effect.

We, the undersigned, are writing to ask you to use your powers under the Housing and Planning Act 2016 and, if necessary, the Planning and Compulsory Purchase Act 2004, to direct that adoption of the Cherwell Local Plan Partial Review and the Oxford Local Plan should not take place until the plans are amended to remove the proposals for Green Belt development, thereby respecting the Government's longstanding and very clearly stated policy and manifesto commitment.

### **Oxford's exaggerated and unrealistic 'need'**

The proposed removal of Green Belt in Cherwell's plan is entirely to meet a purported housing 'need' from Oxford City Council and reflects a long-held ambition by that Council to expand its boundaries into the surrounding countryside. However a leading consultancy in housing need assessment, acting for the Cherwell Development Watch Alliance (CDWA), showed at both the Cherwell and Oxford examinations in public that this need has been exaggerated by a factor of around two. This was also confirmed in a late draft of Oxford's own evidence (provided to us in response to a Freedom of Information request and therefore a

public document) which shows how the final version was altered very late in the day to conceal its conclusion on an objective assessment of Oxford's housing need which was about half the level put forward in the plan. This compelling evidence, which we can make available, has to date been ignored by Inspectors keen, no doubt, to be 'pragmatic' as your predecessor urged, but disregarding your manifesto commitment. Our evidence is reinforced by the Office for National Statistics's projection of a decline in Oxford City's population over the plan period (published in March 2020, after the Inspectors' initial conclusions).

The 'need' claimed by Oxford (28,000 houses over twenty years) is equivalent to a new development about half as big again as the existing city. This cannot conceivably represent the City's need, under any accepted definition. The rates of expansion envisaged would be as great as those of the New Towns during their fastest periods of growth. Such growth is wholly inappropriate to the city of Oxford whose centre is already suffering congestion and pollution but cannot expand or be redeveloped because of its exceptional and extensive built heritage dating from medieval times onwards. The massive growth implied by Oxford's claimed, but unsubstantiated, need can surely not be used to justify 'exceptional circumstances' for taking land from the Green Belt, which exists precisely to protect the character and setting of the city from such growth.

### **Oxford City Council's very poor record on delivery**

Oxford City Council, which is Labour controlled, has a very poor record on housing delivery. It has failed the housing delivery test, only delivering 70% of its requirement in the last three years (MHCLG, published 20<sup>th</sup> February 2020). Delivery has declined year on year to 343 in 2018/19 (against a requirement of 743). This means that it will have to identify a buffer of 20% more land for housing and develop an action plan for improvement. The Council has consistently failed to achieve the level of 'affordable' housing it claims to need, while the residential densities it proposes are far lower than they could be.

For many years Oxford has had a large number of vacant and under used employment sites which could readily accommodate housing. Yet its submission plan includes policies that seek to protect such sites. It also chose to allocate a major site known as 'Oxford North' as a business park, despite over provision for such uses in the surrounding area and the fact that the site could have provided substantially more housing.

### **Consequences for the Green Belt**

Oxford City Council is therefore both failing to provide for its own true needs and take advantage of opportunities to do so, while expecting the surrounding Districts to accommodate an exaggerated need within the Green Belt. The result of such excessive development will be urban sprawl, coalescence of existing distinct settlements, the removal of a strategic gap and destruction of the countryside, precisely the things that the Green Belt is intended to prevent. Recent events have demonstrated the importance of recreational access to green spaces and their significance in providing green lungs for urban areas. Moreover urban sprawl (particularly at the low densities proposed in Cherwell's plan) will add substantially to the difficulty of achieving air pollution and carbon reduction targets.

We acknowledge that some growth is necessary and we support development that is essential to ensure that Oxford's world class University continues to thrive. However, we

believe that this can be achieved without destroying the very thing that makes Oxford such a special place and which the Green Belt protects. Indeed it was acknowledged in a Times leader on March 4<sup>th</sup> that the Green Belt has "*largely worked, by ensuring that historic cities such as Oxford and York can be enjoyed without approaching them through a desert of suburban sprawl.*"

### **Similarities with the London Plan**

The situation in Oxford is similar to that in London where you directed the Mayor, Sadiq Khan (13<sup>th</sup> March 2020), to make changes to the London Plan. You pointed to "deeply disappointing" housing delivery below assessed need, housing starts falling over time, "worsening affordability" and "missed opportunities to increase housing delivery". These are precisely the failings of Oxford City Council that we have outlined above.

Your letter to the Mayor emphasised the need for "optimising density", "making best use of brownfield and underutilised land", encouraging "more optimal uses for industrial sites where housing is in high demand" and "removing the 'no net loss' requirement on existing industrial land sites". CDWA also proposed exactly these changes to Oxford's Local Plan. Policies like these, together with a realistic assessment of Oxford's need and implementation of your commitment to protect the Green Belt, are what we ask for in Oxford.

### **Changed Circumstances**

The effects of the current public health emergency will undoubtedly disrupt the economy, the housing market and house building for a considerable time so that any urgency that could have been claimed for the adoption of these plans has now disappeared. As things stand, the widespread release of Green Belt land is likely to lead to 'cherry picking' of sites by developers and undesirable, uncoordinated development. The emergency, while tragic in its consequences, does give an opportunity to rethink the plans, to make them more sustainable and to avoid the Green Belt development that is contrary to Government policy and commitments. Such a rethink could also help to address our other, on-going, emergency and help in the achievement of our national climate change targets.

### **Overwhelming Local Opposition**

People living in the Green Belt settlements to the North of Oxford have been almost unanimously opposed to these plans. Cherwell Council received an unprecedented level of objections and acknowledged that: "The vast majority of the representations raised objections to the Plan" (Cherwell DC, Statement of Consultation, February 2018). The local parish councils, representing around 20,000 people, are opposed as is our local MP. All of the District Councillors for the area, including Conservatives, voted against Cherwell's plans.

The local population has always resisted Oxford City Council's desire to expand into the surrounding areas thereby swallowing distinctive communities into one amorphous urban sprawl. However they are dismayed that a Conservative Government is allowing this to happen and recent election results in these areas have reflected this as voters look to parties other than the Conservatives in an attempt to protect the Green Belt.

When he was a housing minister, Alok Sharma, responding to a question from our MP in the House of Commons, said that: *“We are committed to retaining the current green belt protections. There may be exceptional circumstances in which a local authority chooses to amend its green belt, but **it has to take its local community with it.**”* (Hansard, HC Debate, 30<sup>th</sup> October 2017) (our emphasis). Was Mr Sharma’s commitment just hollow and meaningless words?

We urge you, therefore, to halt the adoption of these plans and direct the authorities to change them to respect your Government’s manifesto commitment. Please do this before it is too late and this Government’s reputation is forever associated with the disastrous loss of substantial and strategic Green Belt land in this area. We look forward to hearing from you.

Yours sincerely,

Alan Lodwick, MRTPI(retd), for Cherwell Development Watch Alliance

Giles Lewis, Chair, Begbroke & Yarnton Green Belt Campaign  
Sue Stewart, Chair, GreenWayOxon  
Caroline Johnson, Chair, Harbord Road Area Residents’ Association  
Linda Ward, Chair, Kidlington Development Watch  
Dr. Bob McGurrin, Chair, Woodstock Action Group

Layla Moran, MP for Oxford West and Abingdon

Malcolm Ryder, Chair, Begbroke Parish Council  
David Robey, Chair, Kidlington Parish Council  
Clive Stayt, Chair, Gosford and Water Eaton Parish Council  
Graham Thompson, Chair, Yarnton Parish Council  
Mathew Parkinson, Mayor and Ann Grant, Deputy Mayor, Woodstock Town Council

Cllr Maurice Billington, Oxfordshire County Councillor, Cherwell District Councillor for Kidlington East and formerly Chair of Cherwell District Council  
Cllr Conrad Copeland, Cherwell District Councillor for Kidlington West  
Cllr Carmen Griffiths, Oxfordshire County Councillor, Cherwell District Councillor for Kidlington East  
Cllr Ian Middleton, Cherwell District Councillor for Kidlington East  
Cllr Katherine Tyson, Cherwell District Councillor for Kidlington West

Dr Peter Collins, Chair, CPRE Oxfordshire  
Sir David Gilmour, Chair, Cherwell CPRE  
Martin Harris, Co-ordinator, Oxford Green Belt Network  
The Hon Peter Jay, Chair, Rural Oxfordshire Action Rally

David Young, formerly Director of Environmental Services, Oxfordshire County Council  
Chris Cousins, former Head of Sustainable Development, Oxfordshire County Council  
Noel Newson, former Group Manager for Sustainable Transport, Oxfordshire County Council  
Gill Oliver, former Planning Policy Manager, South Oxfordshire District Council  
Roger Williams, former Head of Transport, Oxfordshire County Council