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*Detailed
description of
Green Belt parcels
in Oxford*

**Oxford Local Plan
2040**

*Including justification for why each area is not
proposed as suitable to remove from Green Belt and
allocate for development*

**BACKGROUND
PAPER 18**

August 2024

1. Proposed Changes to the NPPF, including Grey Belt

The NPPF consultation document (30th June 2024) proposes a new definition of grey belt, as well as altered wording around Green Belt reviews. This new wording suggests that Green Belts should be considered for development where necessary. Although the NPPF is currently just a draft document, in the spirit of the proposed change, given the lack of capacity in Oxford to meet its housing need, we wish to demonstrate how Green Belt has already been considered thoroughly, but does not offer further development potential.

The proposed new wording in the NPPF says that, when looking at Green Belt, plans should consider first previously developed land in sustainable locations, then other grey belt land in sustainable locations, and then other sustainable Green Belt locations. Grey belt is defined as land in the Green Belt comprising Previously Developed Land and any other areas of Green Belt land that make a limited contribution to the five Green Belt purposes, but excluding those areas or assets of particular importance listed in footnote 7 of the NPPF, which are habitats sites and/or SSSIs, designated heritage assets, and areas at risk of flooding or coastal change. Information relating to these criteria is included in the table in Appendix A, although a conclusion has not been drawn about whether a site is grey belt or not. Sites which may meet this definition may not be suitable for development and a judgement would need to be made about whether they are sustainable locations to see if they could be defined as grey belt.

2. Approach to Green Belt review in Oxford

Green Belt work to support the Oxford Local Plan 2040 built on work undertaken to support the Oxford Local Plan 2036. In 2015 the Oxford Green Belt Assessment (LUC) was published. This was a high-level assessment of Oxford's Green Belt, commissioned by the Oxfordshire Growth Board, and looking at the whole Green Belt. It set a methodology for assessing Oxford's Green Belt, that was then followed by Oxford and other Oxfordshire authorities in their own detailed Green Belt assessments.

LUC later carried out two Green Belt Assessments for Oxford in 2017, Oxford Green Belt Study, LUC, May 2017 and the Oxford Green Belt Study Addendum, July 2017, which included a few additional sites. Only a limited number of sites were included in these Green Belt assessments. This is because there was considered to be no benefit to assessing the Green Belt function of parcels of land which were not developable at that time, for example because they are functional flood plain, or because the landowner expressly wished to prevent development.

Sites which would have a moderate-high or high impact on the integrity of the remaining Green Belt if they were to be removed from it, were not considered further for development. Some sites that had a moderate or lower impact on the Green Belt were subsequently removed from the Green Belt through the Oxford Local Plan 2036 process and allocated for development.

To support the Oxford Local Plan 2040, an update to the Green Belt assessment was undertaken (GRE.006). This was published alongside the Oxford Local Plan 2040 Preferred Options Part 2 consultation document in 2023. This assessment looked again at remaining Green Belt that had been previously assessed, in case its function had or may change following any previous releases of Green Belt. Some additional sites worth assessing were also found and assessed. The Regulation Part 2 Consultation Document explains why no sites were considered suitable for an allocation for development.

3. Detailed description of Green Belt parcels

The intention of the table in Appendix A of this paper is to show clearly how the approach has applied to each parcel of Green Belt, at the same time adding context to enable consideration of the implications of impending changes to the NPPF, including the definition of grey belt. It brings together information that is available elsewhere into one place. As described above, each parcel had been considered in terms of whether it may have potential for development, and only those that may do so were included in a Green Belt assessment. However, given the proposed new definition of grey belt and further changes to the NPPF relating to Green Belt, these considerations are now set out in one place for clarity.

The table (Appendix A) lists each HELAA site, by its name and reference number, that is within Green Belt. Virtually all of the Green Belt is covered by HELAA sites, and maps of these are shown in Appendix B. The table in Appendix A then describes each site briefly, primarily to explain whether it is greenfield or brownfield land, which is relevant to the definition of grey belt. Some sites have a few buildings on, but none are wholly brownfield.

The table lists considerations that may affect developability of the site. It notes whether a Green Belt assessment has taken place for the site, and which assessment that is. It then concludes with a summary of the reasons the site may or may not be considered worthy of consideration for development.

Intrinsic reasons for not proposing development on Green Belt sites

Greenfield sites in Flood Zone 3b are functional floodplain that should not be developed. The definition of grey belt excludes sites at flood risk although the level of flood risk is not

specified. For the purposes of this piece of work, only Flood Zone 3b on greenfield is considered as an intrinsic reason not to consider a site further for its development potential.

Biodiversity designations, at any level, are considered reason enough not to investigate further the development potential of sites in the Green Belt. Whilst occasionally there may be potential to move habitats, plants or animals from a development site, the starting point will be a preference to keep them in situ, especially when they are part of a corridor, so these sites are not considered further.

Some sites are part of the Core GI Network but do not have biodiversity protections and are not in Flood Zone 3b. These have been identified as having an important wildlife corridor function, based on information including the countywide Nature Recovery Network. Whilst these sites are not necessarily excluded from the definition of grey belt, identifying them for development would be contrary to other policies of the plan, so they are not considered further for their development potential.

Other considerations

The table also notes whether there is a statutory heritage designation relevant to the site, as these are proposed in the draft NPPF as reasons a site would not be considered grey belt. Where the site is a Registered Park and Garden it will already be included as part of the Core GI Network. Listed buildings are noted, but these will not affect whether a site is developable any more on Green Belt than in other locations. Likewise, Conservation Areas are noted. However, being within a conservation area would not be taken in and of itself as a reason not to consider a site as having development potential, and a fuller consideration would be needed of specific contributions of the open space on the setting and special character of the conservation area. In any event, in no instance is the presence of a heritage asset the sole reason for not considering a Green Belt site to have development potential.

4. Conclusions

The table demonstrates that all the remaining Green Belt is not at the current time developable. In many cases, this is because the sites are Flood Zone 3b or there are biodiversity protections. Where this is not the case, the sites have generally been assessed through the separate GI assessment work as having an important GI function and being part of the Core GI Network so would not be considered developable under Policy G1. A few other sites are active sports pitches with no means of replacing them having been suggested or obvious. Therefore, to develop them would be contrary to other policies of the plan (Policy G1), regardless of whether or not they may be considered 'grey belt'. Finally, a

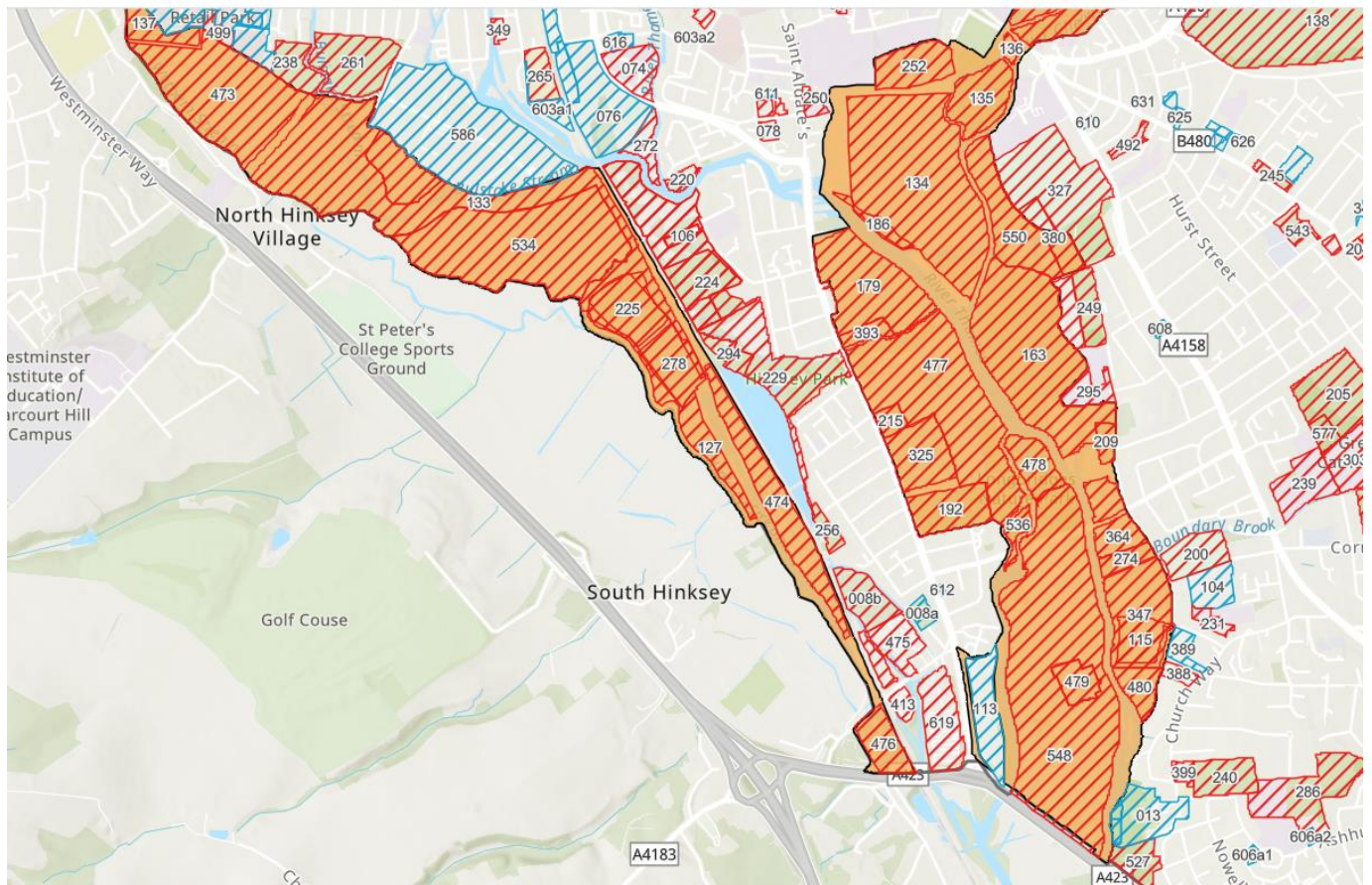
few sites have specific reasons they are not considered suitable, which may be a lack of any potential, suitable access at the current time, or stated landowner lack of intent (for example of Oxford Preservation Trust, who own various Green Belt sites specifically for the purposes of preserving their open setting).

Appendix A: Table describing characteristics of each HELAA site in Green Belt and concluding on whether it has development potential

Table saved as separate document.

Appendix B: Maps showing HELAA site reference numbers and Green Belt

South



Oxford Green Belt



North

