



**Hearing Statement
Respondents Reference:**

831779 & 877851

**EXAMINATION INTO THE VALE OF WHITE
HORSE LOCAL PLAN 2031 PART 1:
STRATEGIC SITES AND POLICIES**

Matter 5

**Proposed Revision to Green Belt
Boundaries**

January 2016

Introduction

1. This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2011-2031: Part 1 on behalf of the below listed landowners.
2. This representation follows representations submitted in relation to Stage 1 of the Examination held in 2015; we trust that the Inspector will have regard to those comments where relevant to the issues now under examination.
3. This statement responds to the Inspector's questions in relation to Matter 5, it should however be read alongside previous submissions in relation to Stage 1 of the examination, and accompanying statements relating to other matters examined at this stage.
4. Represented landowners
 - Robert Graham Boyles
 - Geoffrey John Boyles
 - Jean Ellen Frances Boyles
 - Elizabeth Ann Boyles
 - Robert Gee
 - John-Michael Gee
 - Richard Venables
 - Tracie Palfreyman
 - Julie Van Onselen
 - Lisa Venables
 - John Rand
 - Denise Fletcher
 - Lucy Hick
 - Jonathan Kenwright

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Matter 5 – Proposed Revision of Green Belt Boundaries (including CP13)

“5.1 Do the exceptional circumstances, as required by the NPPF (paragraphs 79-86), exist to justify the plan’s proposed revision of the boundaries of the Green Belt, having particular regard to:

(a) Housing Allocation sites 1, 2, 3 and 4?

(b) The land between sites 1 and 2, to the east of the A34?

(c) The land to be removed from the Green Belt but not allocated for any particular use?”

5. The plan seeks to meet the objectively assessed housing need for the District in a sustainable manner. The spatial strategy seeks to locate new homes close to employment centres, Oxford is the County’s major employment centre and benefits from excellent transport connections therefore it is logical that Green Belt boundaries are reviewed to enable sustainable development in line with the spatial strategy and other sustainable aspirations.

6. The NPPF exclaims that Green Belts should not include land that it is not necessary to keep permanently open, we therefore welcome the Council’s review of boundaries considering the need for Green Belt designation, particularly in light of housing need. In relation to land south of Cumnor we welcome the Council’s review as we believe to release of land here would be in line with the exceptional circumstance tests set out at paragraph 85 of the NPPF.

7. Core Policy 8 categorises Cumnor as a ‘larger village’ in acknowledgement of the sustainability of the settlement as a location for development. The plan seeks to direct development to sustainable settlements, including development of land immediately adjacent to larger villages. The removal of land from the Green Belt around this larger village is therefore in line with the emerging spatial strategy. We consider land south of Cumnor to be particularly suitable for removal as the southern extent of the area proposed for removal benefits from distinct hedge and treeline boundaries. These features are readily recognisable and would be protected in any future development by the relevant development management policies, they therefore give a recognisable edge to the Green Belt as required under paragraph 85 of the NPPF.

8. Whilst we are supportive of the principle of the Green Belt boundary review to the south of Cumnor we are concerned at an anomaly in the proposed boundary. The Draft Proposals Map (DLP03a) shows the proposed revision to the Green Belt boundary around Cumnor. Whilst the majority of land proposed for development to the south of the village is omitted from the Green Belt a parcel of land to the south of Appleton Road is proposed to remain designated. The area suggested to be retained as Green Belt is an island divorced from designated land in all directions.

9. The rationale for the retention of this area as Green Belt is unclear, however the Phase 3 Green Belt Review (NAT03) identifies the division of land in this area by hedgerows and trees as being characteristic of the setting of the village and the Conservation Area. The document recommends these features are, as far as possible, retained as part of Green Infrastructure for the area. Despite similarities in wording a desire to retain Green Infrastructure is not justification for Green Belt designation.

10. The Conservation Area, including its setting is protected by dedicated policies in the development plan, as are important landscape features including trees and hedges. Whilst the Council's assessment notes the importance of tree lines and hedgerows to the wider Green Belt it is not necessary for the land to be designated to secure this. The proposed retained island of Green Belt land does not therefore satisfy any Green Belt purpose within the terms of paragraph 80 of the NPPF and should therefore be removed with the other land south of Cumnor proposed by the Council.

11. In addition to concerns as to the detail of the proposed Green Belt boundary around Cumnor we also have broader reservations with regard to the longevity of the proposals in view of the known need to provide further housing to meet Oxford City's needs. We believe the proposed two-stage plan making process undermines the certainty of the plan and the Green Belt contrary to paragraphs 83 and 85 of the NPPF.

12. The plan is proposed to be reviewed, dependant on the outcome of Oxfordshire Growth Board (OGB) discussions, in 12 to 18 months in order to address issues which arise for the district from the OGB's conclusions. The principle issue arising from the OGB will be an apportionment Oxford's unmet housing need to be provided for within the district. The most suitable sites to

serve Oxford and meet that need are in the vicinity of the city and therefore likely to give rise to further need for review of the Green Belt; this is problematic in terms of NPPF requirements.

13. Paragraph 83 of the Framework makes clear that *“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”*.
14. The Framework also makes clear that LPAs should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period (paragraph 85). As presently proposed there is likelihood the Green Belt boundaries will require review soon, if not immediately after adoption. The proposed short-term review offers very little certainty and is clearly contrary to paragraph 85 of the NPPF.
15. Although Oxford City’s housing need was considered at Stage 1 of this examination no preliminary findings have been published. The Inspector acknowledges in his letter advising that this stage examination was proceeding that the issues of each stage were closely entwined; the question as to how Oxford City’s unmet need is addressed is fundamental to the Green Belt review. It is also relevant that the initial examination stage of the West Oxfordshire Local Plan 2031 has occurred in the intervening period with the Inspector publishing findings which are relevant.
16. The most recent timetable for the OGB indicates a statement of co-operation setting out an agreed distribution of housing to address Oxford’s unmet need will be published in July 2016, with some core evidence completed by April 2016.
17. The Inspector considering the West Oxfordshire Local Plan has stated in his preliminary findings that the district’s apportionment of Oxford’s unmet housing need would be of considerable significance and weight *“since it will have emerged from an evidence-based process to inform spatial options for growth outside of Oxford City”*. His initial view is that it would need to be taken into

account in calculating the 5 year land supply for the district. The Inspector goes on to suggest that if the plan were to proceed without having regard to any apportionment made by the OGB it would immediately be out of date.

18. The Council's latest Local Development Scheme (LDS) published in March 2015 anticipated the plan currently under examination would be adopted in November 2015. Having regard to the projected time between examination and adoption in the LDS, and previous delays in the plan making process the plan is now unlikely to be adopted before the District's apportionment of Oxford's unmet need has been agreed. The plan could therefore be out of date before it is adopted.
19. Any housing within the Vale of White Horse that is to contribute to meeting Oxford's unmet housing need would be best located in the vicinity of the City close to transport corridors. Development in such areas will require a Green Belt review, it would therefore be in line with the requirements of the NPPF, particularly paragraphs 83 and 85, to address Oxford's unmet need now.
20. The alternative, if the plan presently proposed were to proceed to adoption, is for revised Green Belt boundaries to be subject to immediate review. Such short lived designation is clearly contrary to advice in the NPPF at paragraphs 83 and 85 and would only serve to undermine the certainty of the plan-led system.