

Mike Gilbert Planning

Vale of White Horse Local Plan

Consultation Draft

February 2014

Objection to the Green Belt Review

And the proposed housing site -

Land south of Cumnor

3rd April 2014

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Introduction

1. This report is submitted on behalf of over 100 residents of Cumnor and sets out the strong objections to the Green Belt Review (which is only a partial review of the Oxford Green Belt) and the proposal to allocate land south of Cumnor within the Green Belt for a development of 200 houses in the Consultation Draft Vale of White Horse Local Plan, February 2014.
2. The objections relate to the principle of excluding land from the Oxford Green Belt, the principle of developing the land at Cumnor as it lies within the Green Belt, and to more specific issues relating to the sustainability and viability of the proposal - i.e. visual and landscape impact, impact on the setting and character of Cumnor Conservation Area, traffic impacts within Cumnor village, the capacity of local schools and, crucially, whether the site is deliverable within five years.
3. This report will highlight that the Government has made it clear that unmet housing need is not an exceptional circumstance to justify changing Green Belt boundaries and, in any event, there is no need to sacrifice scarce and vulnerable Green Belt land to meet the identified housing need. In addition, it will be demonstrated that the preferred development site at Cumnor would not be a "*sustainable extension*" to the village, the Council's site selection methodology is flawed as the evidence base does not properly inform the decision to identify the Cumnor site, and a significant number of the key objectives and design principles of the proposed development simply cannot be achieved. Finally, it will be confirmed that the Cumnor site is not deliverable as some of the landowners of the site do not wish their land to be developed.
4. The following documents included within the evidence base of the Consultation Draft Local Plan and published in February 2014 have informed this submission:
 - Local Plan Housing Delivery Update
 - Local Plan Housing Delivery Update, Appendix A: Development Site Templates
 - Local Plan Housing Delivery Update Supporting Paper

- Local Plan Housing Delivery Update Supporting Paper, Appendix 5: Site Information Tables
- Sustainability Appraisal
- Summary of Transport Assessment Work
- Vale Strategic Housing Market Assessment (SHMA) Non-Technical Summary
- Economic Forecasting Report
- Green Belt Review, Phases 2 and 3 Reports
- Council's Response to the Green Belt Review
- Historic Landscape Character Assessment
- Infrastructure Delivery Plan
- Landscape Capacity Study
- Habitats Regulations Assessment
- Town and Village Facility Update
- Strategic Housing Land Availability Assessment (SHLAA) Update

Reference has also been made to the Cumnor Conservation Area Appraisal, which was published by the Council in January 2011.

5. Photographs of the identified land on the south side of Cumnor and traffic congestion on the narrow village streets are at Appendix 1.

The Oxford Green Belt

6. Paragraph 2.5.2 of the Landscape Capacity Study summarises the purpose and significance of the Oxford Green Belt:

"The Oxford Green Belt was designated to preserve its openness and the special character of Oxford and its landscape setting. The northern part of the Vale of White Horse is included in the Green Belt and contributes to the character of Oxford and its landscape setting, including both the Thames landscape corridor and parts of the North Vale Corallian Ridge and Lowland Vales landscapes."

7. Since the approval of the Oxford Green Belt in 1975, the Vale has been at the forefront of defending it against inappropriate development and protecting the unique character and landscape / rural setting of Oxford by preserving its openness. As a result, the Oxford Green Belt has stood the test of time and, in accordance with Government policy, the land has been kept permanently open and the countryside safeguarded from encroachment. Paragraph 79 of the National Planning Policy Framework sets out Government policy on Green Belts:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

8. This essential purpose of the Government's Green Belt policy was affirmed by the Planning Minister, Nick Boles, in a letter dated 10 March 2014 which is attached at Appendix 2. The Minister said:

"We have carefully listened to representations from colleagues in recent Parliamentary debates. In particular, to help councils with their Local Plans, we are:

- Re-affirming the importance of Green Belt protection and ensuring its robust safeguards are not undermined when assessing unmet housing need."*

9. The Planning Minister also wrote to the Chief Executive of the Planning Inspectorate on 3 March 2014 on the issue of Green Belt policy. The letter is at Appendix 3. The Minister said:

"Alongside these reforms we were always very clear that we would maintain key protections for the countryside and, in particular, for the Green Belt. The National Planning Policy Framework met this commitment in full. The Framework makes clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt."

10. In addition, the final version of the National Planning Practice Guidance was published online on 6 March 2014. Under the headings *Housing and economic land availability assessment*, and *Methodology – Stage 5: Final evidence base*, paragraph 34 of the Guidance says:

"Can unmet need for housing outweigh Green Belt protection?"

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt."

The Government's position on Green Belt policy, therefore, is very clear. The fundamental aim remains to prevent urban sprawl by keeping land permanently open. Boundaries of Green Belts should only be changed in "*exceptional circumstances*", and unmet housing need is not an exceptional circumstance to justify taking land out of the Green Belt. Within this context, the following comments are made on the Vale's recent Green Belt Review.

11. The Review criticises the original Green Belt designation for setting the inner boundaries tightly around the inset villages leaving no land for them to grow. However, the boundaries were intentionally set tightly to ensure the villages did not come under constant pressure to grow which would have undermined the purpose of designating the Oxford Green Belt. It needs to be remembered that the Oxford Green Belt is one of the narrowest Green Belts in the country at only four to six miles wide, so it is very sensitive to incremental erosion at its edges. In any event, it is not correct to say that the inset villages were left with no room to grow. The Glebe in Cumnor, for example, is a development of 84 houses built in the early 1980's and, due to the attractive location close to Oxford, it is a good example of

available sites in the area being developed as soon as they are confirmed rather than being safeguarded to meet future development needs.

12. Paragraph 4.2 of the Green Belt Review Phase 2 Report says:

"The key consideration is to what extent the land in its current state meets the five purposes of the Green Belt, is open in character and contributes to the wider openness of the Green Belt."

The land south of Cumnor is certainly open in character and contributes to the wider openness of the Green Belt as it extends across the open farmland between Cumnor and Appleton to the south. The development of the land would clearly be contrary to the Green Belt purpose of *"safeguarding the countryside from encroachment."* This is acknowledged in Table 4 of the Phase 2 Report which says in relation to the purpose of safeguarding the countryside from encroachment, the Cumnor site is:

"part of the Vale landscapes that complement the river landscape corridors and wooded hillsides beyond the inner edge."

13. In addition, the Green Belt Review Phase 3 Report under the heading *Cumnor: Proposed Changes* says:

"The division of the land within Areas 5, 6 and 24 into small parcels of land divided by hedgerows and trees is a key characteristic of the setting of the village and the Conservation Area. As far as possible these should be retained and included in the Green Infrastructure for the area. Areas of pasture are important local landscape features and where possible, especially where they contribute to the setting of the Conservation Area, they should be retained as open space."

These areas include the small parcels of land enclosed by trees and hedgerows which comprise the proposed housing site and which, therefore, are acknowledged to be important local landscape features which contribute to the setting of the Conservation Area and so should be retained as open space.

14. Paragraph 22 of the Council's Comments on the Green Belt Review says:

"Paragraph 83 of the NPPF states that Local Planning Authorities should only alter Green Belt boundaries in exceptional circumstances. Paragraph 85 of the NPPF states that defined boundaries should be consistent with the strategy in the Local Plan for meeting identified requirements for sustainable development. On this basis, we think that land should only be released from the Green Belt if it is developable and would constitute sustainable development."

This comment is far too simplistic. Clearly, there are many sites within the Green Belt that are developable and could constitute sustainable development. The correct test is whether there are *"exceptional circumstances"* to justify changing the Green Belt boundaries. The Council claims that the significant increase in housing need identified in the up-to-date SHMA constitutes such an exceptional circumstance. However, as confirmed in paragraphs 8 - 10 above, the Government has made it clear that unmet housing need is not an exceptional circumstance to justify taking land out of the Green Belt.

15. On this point of principle, therefore, objections are raised both to the Green Belt Review and to the proposed allocation of the land south of Cumnor within the Green Belt for a development of 200 houses. Such a development would have a significant visual and landscape impact, harm the openness of the area, and harm the setting of the Cumnor Conservation Area. More importantly, the need to release land in the Green Belt has not been exceptionally justified as required by Government policy. 23% of the required additional homes (i.e. 1,720 homes) are proposed within the Oxford Green Belt, which is wholly disproportionate given that less than 13% of the Vale's 580 sq km total area is included within the Green Belt.
16. Given the unexpectedly high level of housing need identified in the SHMA, there is a need to carry out a further call for potential development sites at this stage to avoid sacrificing vulnerable and sensitive parts of the Green Belt. A further call for sites would demonstrate that there are plenty of opportunities to find suitable and available housing land across the Vale outside the Green Belt. Alternatively, the

300 or so sites put forward as part of the previous call for sites in 2013 could be revisited. Paragraph 6.1 of the SHLAA Update report says:

"The SHLAA has identified relevant sources of potential housing supply. It has identified that there is a significant amount of land suitable in principle for housing on the edge of settlements and that the number of potential sites exceeds the amount of land we need to allocate to meet the targets within the local plan."

17. The Green Belt Review does not include a proposal to replace any of the Green Belt land proposed to be lost by extending the Green Belt boundaries elsewhere. This is despite a recommendation in the Sustainability Appraisal that the Council should consider the need to identify replacement land to ensure there is no net loss in Green Belt land. The Council's proposal to lose about 70 hectares of land in total from the Green Belt, therefore, would be a permanent loss and can only be seen as an erosion of the integrity and fundamental purpose of the Green Belt of keeping land permanently open and preserving the landscape / rural setting of Oxford.
18. For all of the above reasons, the proposals amount to an unnecessary sacrifice of scarce and vulnerable Green Belt land.

A "sustainable extension to Cumnor"?

19. Appendix A of the Housing Delivery Update, Development Site Templates, describes the proposal for 200 houses on land south of Cumnor as a "sustainable extension" to the village. However, as the National Planning Policy Framework confirms, there are a number of issues which determine the sustainability credentials of a particular proposal. Such an assessment requires much more than an over-reliance on a site's proximity to Oxford. The following paragraphs challenge the assertion that the proposal amounts to a sustainable extension to Cumnor.
20. The Landscape Capacity Study confirms that the landscape capacity of the site (i.e. its ability to accommodate development) is the lowest of the five categories. In other words, the site scores highly in terms of its overall landscape and visual sensitivity and its landscape value. Accordingly, the Study recommends that only part of the site should be considered for development - i.e. 2.4 hectares capable of accommodating 60 houses. The landscape and visual sensitivity of the site is enhanced by the fact that public footpaths 184/12 and 184/24 cut through the heart of the site and the land rises noticeably to the east and west from the stream which runs through the middle of the site - see the photographs of the site at Appendix 1. The development of such a sensitive site in landscape terms is contrary to the principles of sustainable development.
21. The 2014 SHLAA Update confirms that the site is grade 2 agricultural land. It is, therefore, "best and most versatile agricultural land". The development of eight hectares of such high quality land ahead of areas of poorer quality land is contrary to paragraph 112 of the National Planning Policy Framework and is contrary to the principles of sustainable development.
22. Development of the land south of Cumnor will harm the setting and character of Cumnor Conservation Area and the setting of the adjacent grade II listed building, The Farmhouse. The Green Belt Phase 3 Report says that the site comprises small parcels of land divided by hedgerows and trees and is a key characteristic of the setting of the village Conservation Area, so it should be retained as open space

(see paragraph 13 above). The development of the site, therefore, and the loss of these small parcels of farmland would only harm the setting of the Conservation Area and the listed building.

23. In addition, the Cumnor Conservation Area Appraisal was published in January 2011. The Appraisal highlights the narrowness of the village streets and how this helps to create an intimate sense of scale. Both sections 7.2 and 7.8 say:

"The busy roads mean that Cumnor is spoilt by traffic noise and the frequent movement of cars and commercial traffic, such that it can no longer claim to be a peaceful rural settlement."

24. The addition of 200 houses accessing onto Appleton Road will make this problem much worse. To gain access to jobs, schools, shops and leisure facilities in Oxford and Abingdon, and to gain access to both the A420 and A34, virtually all of the traffic from the new houses would need to go through the narrow streets in the core of the village. The vast majority of the new jobs being created during the Local Plan period are located at Milton Park, Harwell Oxford, Didcot A, Grove and Faringdon which are all well away from Cumnor and the Oxford fringe. All of this additional traffic in the village core can only harm the character of the Conservation Area. Harming heritage assets (i.e. the village Conservation Area and the listed building) is contrary to the principles of sustainable development.

25. A significant increase in traffic in the village centre causing accessibility problems and potential highway danger is a major concern of local residents. According to the TRICS database, the average vehicle trip rates per house are as follows:

	Inbound	Outbound	Two way
AM peak 0800 - 0900	0.119	0.371	0.490
PM peak 1700 - 1800	0.417	0.199	0.616
Daily 0700 - 1900	2.795	2.755	5.550

For the proposed 200 houses at Cumnor, this means that total peak hour and daily vehicle trips are as follows:

	Inbound	Outbound	Two way
AM peak 0800 - 0900	24	75	99
PM peak 1700 - 1800	84	40	124
Daily 0700 - 1900	559	551	1,110

26. This is a significant number of additional vehicular movements through the narrow village streets, all of which would need to go past the primary school on the one-way system - see the photographs of the congested village streets at Appendix 1. The site information tables in Appendix 5 of the Housing Delivery Update Supporting Paper confirm that this is a problem by saying in relation to the proposed Cumnor site:

"The wider [road] network is close to capacity, and additional growth and development may lead to worsening conditions."

The resulting added congestion, noise and fumes pollution, and potential highway danger within the village core from this additional traffic without any potential for mitigation will make the current bad situation much worse and is contrary to the principles of sustainable development.

27. For all of the above reasons, and despite its proximity to Oxford, the proposed development of the land south of Cumnor will not result in a *"sustainable extension"* to the village. This conclusion is confirmed by the Sustainability Appraisal which, at Table A4 in Appendix 2: Additional Strategic Sites Appraisal on page 176 relating to Objective 8 *"to protect the cultural heritage and provide a high quality townscape and landscape"* says that only part of the site should be taken forward for consideration in order to avoid adverse landscape and visual effects.

Site selection methodology

28. The Housing Delivery Update Supporting Paper explains the five stages of the methodology used to identify the preferred development sites. The following comments are made on the robustness of the methodology:

- At Stage 2, *Initial site filters*, two villages are excluded from further consideration as they lie within the AONB. This seems to be an arbitrary initial filter. Why not exclude villages because they are, say, constrained by the Green Belt or are less accessible to the main employment centres?
- At Stage 3, *Identification of key constraints and opportunities*, the location of a site within or adjacent to the Oxford Green Belt is one of 23 issues considered. However, no weighting is used to prioritise these issues some of which are clearly more significant than others. As a result, there is no recognition of the significance of a site's Green Belt status.

- At Stage 5, *Identification of preferred sites*, paragraph 84 says:

"In identifying our preferred sites, we gave first consideration to those sites which are not located within the North Wessex Downs AONB or the Oxford Green Belt. However, given the level of housing required, we have also identified sites within the AONB and Oxford Green Belt."

This approach is too simplistic and confirms that the methodology used includes identifying unmet housing need as an exceptional circumstance to justify taking land out of the Green Belt, which does not accord with Government policy (see paragraphs 8 - 10 above).

- Paragraph 12.4.21 of the Sustainability Appraisal says:

"The remaining sites in the 'Green Belt' list are all needed in order to contribute towards the district's objectively assessed housing need, particularly in the first five years of the plan period. The Green Belt Review identifies that the majority of these remaining sites can be developed without threatening the integrity of the Oxford Green Belt."

This statement is no more than an unsubstantiated assertion. There are alternative ways of finding land to meet the Vale's objectively assessed housing need, so there is no need to sacrifice scarce Green Belt land. The worry is that such an unsubstantiated assertion in the Sustainability

Appraisal has been used to justify the preferred strategy of removing about 70 hectares from the Oxford Green Belt.

- One matter which has not been given proper weight in the site selection methodology is the location of the new strategic housing sites in relation to the main employment centres across the Vale. According to Table K.4 of the Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, 10,967 out of the 11,340 new jobs which are to be created will be at Milton Park, Harwell Oxford, Didcot A, Grove and Faringdon. This equates to 96.7% of all of the new jobs in locations well away from Cumnor and the Oxford fringe. The identification of a strategic housing site at Cumnor, therefore, is not sustainable and will add a significant number of peak hour traffic movements on the local road network, including the congested A34. This issue should be given more weight in the site selection methodology as it relates directly to the sustainability of the proposed housing sites.
- Both the Landscape Capacity Study (see paragraph 20 above) and the Sustainability Appraisal (see paragraph 27 above) recommend that only part of the Cumnor site should be considered for development - i.e. only 30% of the proposed development site. In addition the Green Belt Review Phase 3 Report says that, as far as possible, the "*small parcels of land divided by hedgerows and trees*" which comprise the site should be retained and included in the Green Infrastructure for the area (see paragraph 14 above). There is no explanation in any of the many Consultation documents why these recommendations have been ignored and the decision has been made to propose the whole eight hectares for a development of 200 houses. The purpose of the evidence base is to inform the decisions about the location and size of the preferred development sites, and the process of the evidence leading to the decisions needs to be transparent. Unfortunately, this is not the case regarding the Cumnor site as there is no explanation why the site is considered suitable for a large-scale development of 200 houses contrary to the recommendations in the Landscape Capacity Study

and the Sustainability Appraisal and the comments in the Green Belt Review Phase 3 Report.

29. Given the above criticisms of the methodology used to arrive at the preferred development sites, a more robust approach should now be taken which properly addresses all of the sustainability issues relating to the potential sites, includes weighting of those issues which are acknowledged to be more significant than others, and provides a clear explanation of how the evidence base has informed the identification of the preferred sites.

Key objectives and design principles

30. The Development Site Templates (Appendix A of the Housing Delivery Update) summarise the key objectives and design principles of the proposed development of the land south of Cumnor. In the light of the above paragraphs, the following comments are made on the achievability of some of these key objectives:

- *Key objective/design principle: To deliver up to 200 homes as a sustainable extension to Cumnor.*

Comment: For the reasons given in paragraphs 19 - 27 above the proposed expansion of the village cannot be considered "sustainable."

- *Key objective/design principle: To ensure development conserves and enhances historic assets and their setting.*

Comment: For the reasons given in paragraphs 22 - 26 above the development, no matter how sensitively designed, will harm the setting and character of the Conservation Area and the setting of the adjacent listed building.

- *Key objective/design principle: To provide contributions to increase the capacity of primary and secondary education.*

Comment: Both the village primary school and Matthew Arnold secondary school have very little capacity to expand. Both schools are already over-subscribed at each age group and they have insufficient land available for expansion.

- *Key objective/design principle: Access to be provided from Appleton Road.*

Comment: Some of the landowners of the field adjacent to Appleton Road do not wish their land to be developed (see paragraph 33 below). In addition, the ownership of the existing access track to Cumnor Cricket Club at the eastern end of the site's frontage onto Appleton Road is not known. Access to the site, therefore, is uncertain.

- *Key objective/design principle: Development must respect and reflect the gradient of the land at this location.*

Comment: The land rises noticeably to the east and west from the stream in the middle of the site and, as a result, parts of the development would be highly visible from all around. For this reason, the Landscape Capacity

Study recommends that only 30% of the site should be considered for development.

- *Key objective/design principle: Ensure development is sensitively designed to conserve and enhance the setting and character of the Conservation Area and listed buildings.*

Comment: For the reasons given in paragraphs 22 - 26 above the development, no matter how well designed, will harm the setting and character of the Conservation Area and the setting of the adjacent listed building.

- *Key objective/design principle: Ensure that development does not result in harm to the open character and openness of the Green Belt.*

Comment: This objective is simply not achievable. Developing eight hectares of open farmland can only harm the open character and openness of the Green Belt.

- *Key objective/design principle: Retain the landscape pasture setting of Cumnor Conservation Area and listed building (The Farmhouse).*

Comment: This objective is simply not achievable. Developing eight hectares of open farmland adjoining the boundary of the Conservation Area and the listed building at a density of 25 dwellings per hectare can only harm the landscape pasture setting of both. This is confirmed in paragraphs 13 and 22 above.

- *Key objective/design principle: "Ensure the density of the scheme respects the loose grain character of the existing village".*

Comment: This objective is simply not achievable. At a density of 25 dwellings per hectare, the development will be a modern housing estate at a relatively high density attached to the loose-knit, low density housing along Appleton Road.

- *Key objective/design principle: Ensure that the new access and junction with Appleton Road is sensitively designed to avoid harm to the Conservation Area and existing mature trees.*

Comment: Table A of the Landscape Capacity Study says the site's development capacity *"is highly constrained by potential landscape impact of the site access."* Accordingly, the Study recommends that only 30% of the site is considered for a development of 60 houses. The higher standard of access required for a development of 200 houses will not achieve this key objective/design principle.

- *Key objective/design principle: The mass and scale of the built form shall be designed to avoid being visually intrusive in the open land to the south.*

Comment: The land rises noticeably to the east and west from the stream in middle of the site and, as a result, parts of the development would be highly visible from the open land to the south. For this reason, the Landscape Capacity Study recommends that only 30% of the site should be considered for development.

- *Key objective/design principle: Provide contributions towards redressing the identified Green Infrastructure deficit in the area surrounding Cumnor.*

Comment: Development of the site will only exacerbate the existing Green Infrastructure deficit in the area around Cumnor. The Green Belt Review Phase 3 Report says that as far as possible the site should be retained and included in the Green Infrastructure for the area (see paragraph 13 above).

31. A significant number of the stated key objectives and design principles of the proposed development, therefore, cannot be achieved. This undermines the credibility of retaining the land as a housing site in the Draft Local Plan.

Deliverability

32. To be deliverable, a site must be in a suitable location, available now, and with a realistic prospect that the housing will be delivered within five years. The land south of Cumnor is one of a number of strategic sites which need to be deliverable as the Council needs to find land for 4,025 out of a total of 7,430 additional homes within the next five years. If an identified strategic site is not deliverable within five years, the Council's five year housing land supply will not be restored and thereafter maintained. The 2014 SHLAA Update says that the availability of the Cumnor site for development, and hence its deliverability within the next five years, is unknown.
33. The site at Cumnor is in a number of different ownerships. Ownership of the 1.62 hectare field adjacent to Appleton Road is shared equally by eight members of the Kenwright / Curtis / Gurdon family. Five of the eight owners of this field have confirmed that they do not wish their land to be developed for housing. That being the case, this significant part of the overall site is not available for development and access to develop the site cannot be achieved via the roadside field. Under paragraph 47 of the Framework, if such a significant part of a site is not available for development now it is not a deliverable site. The whole site, therefore, should be removed as a preferred development site to protect the credibility of the emerging Local Plan and the robustness of its proposals to meet the urgent need for more housing, particularly within the next five years.

Conclusion

34. This report has raised objections to the partial review of the Oxford Green Belt and the proposal to take about 70 hectares of land out of the Green Belt. Government policy makes it clear that the essential characteristics of Green Belts are their openness and permanence, and their boundaries should only be altered in *"exceptional circumstances."* Unmet housing need is not an exceptional circumstance to justify changing Green Belt boundaries, especially when in districts such as the Vale there are plenty of opportunities to find land to meet the identified housing need without having to erode the Green Belt.
35. The Council's own evidence base has identified a number of problems with the proposal to develop the land south of Cumnor with 200 houses. The issues raised, particularly in the Landscape Capacity Study, the Sustainability Appraisal and the Green Belt Review Phase 3 Report, have not been properly addressed so the proposal to include the land for a development of 200 houses has not been justified. In addition, a significant number of the key objectives and design principles of the proposed development cannot be achieved.
36. The site information tables in Appendix 5 of the Housing Delivery Update Supporting Paper give the reason for including the Cumnor site for a development of 200 houses as:
- "Cumnor is a sustainable larger village with opportunities for enhanced public transport connections. The Green Belt Review indicates that some development can be accommodated on the site without threatening the integrity of the Oxford Green Belt. The site will need to be carefully planned to minimise landscape impacts and any impact on the Oxford Green Belt."*

This explanation, however, is poor and fails to justify the inclusion of the site given all of the issues highlighted in this report and the recommendations in the Landscape Capacity Study, the Sustainability Appraisal and the Green Belt Review Phase 3 Report. Despite the assertion to the contrary, the proposal will threaten the integrity and essential purpose of the Oxford Green Belt.

37. Finally, and crucially, not all of the Cumnor site is available for development. If a site is not available now for development, it is not deliverable under the terms of the National Planning Policy Framework.

38. The Council, therefore, is urged to identify alternative development sites outside the Oxford Green Belt and to delete the proposed housing site on the land south of Cumnor.

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