

## Comment

Agent	Ms Gemma Care (741289)
Email Address	gemma.care@bartonwillmore.co.uk
Company / Organisation	Barton Willmore
Address	Beansheaf Farmhouse Reading RG31 7BW
Consultee	Radley College & Kibswell Homes Radley College & Kibswell Homes (873611)
Address	Unknown Unknown Unknown
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Radley College & Kibswell Homes Radley College & Kibswell Homes
Comment ID	LPPub3708
Response Date	19/12/14 13:11
Consultation Point	Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area ( <a href="#">View</a> )
Status	Submitted
Submission Type	Email
Version	0.4
Files	<a href="#">741289 LPPub.pdf</a>
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	Yes
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** Yes

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

2.2 Green Belt Review 2.2.1 As part of the strategy for meeting its growth requirements, the Publication draft of the Plan proposes the release of some sites from the Green Belt for development following a comprehensive Green Belt Review. The Green Belt Review (February 2014) (the Review?), prepared by Kirkham Landscape Planning Ltd and Terra Firma Consultancy forms a key part of the evidence base underpinning the Plan and makes reference to a number of sites within the Freeholder's ownership, most pertinently areas 14, 16 and 17. These areas relate to the proposed North West Radley allocation, land at Gooseacre Farm and the Triangular Field, respectively the latter of which, as the Council will be aware, formed the basis of refused planning application P13/V1268/O in 2013) and are solely within the College's control. The principal purpose of this work was to assess the extent to which the land within the VoWH, which currently comprises part of the Oxford Green Belt, meets the five purposes of the Green Belt as stated in paragraph 80 of the NPPF; namely: to check the unrestricted sprawl of large built up areas; prevent neighbouring towns merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land. In addition, the aims of the Review are to make an assessment of opportunities to enhance the beneficial use of the Green Belt as outlined in paragraph 81 of the NPPF, to review land on the edge of the Green Belt to ascertain if the designation should be extended and to assess whether any of the washed over villages should be included as an inset village.

2.2.2 The Review was undertaken in two phases Phase 1 and Phase 2. The Phase 1 Green Belt Review Report was submitted in October 2013 as an initial assessment to identify land parcels within the Green Belt; it then looked at the edge of the settlements within each land parcel to ascertain how well they performed when considered against the five purposes of the Green Belt. The Phase 1 report was then updated and incorporated into a final Phase 2 Report.

2.2.3 Table 1.0 of the Review at page 3 of the document sets out the assessment criteria adopted by the Council: the criteria mirrors the five purposes of including land within the Green Belt that is enshrined within the NPPF and provides an explanation as to what this means in the context of the VoWH for example, criteria 2 of the table - to prevent neighbouring towns merging into each other explains that for this criterion the town that should be considered is Abingdon-on-Thames in the first instance, but also other settlements currently inset into the Green Belt, which are Appleton, Botley, Cumnor, Kennington, Radley and Wootton. Though most of these are villages rather than towns, the Vale would not wish to allow these settlements to merge.

2.2.4 Section 4 of the Review sets out the methodology that has been used, and explains that along with an assessment of sites against the five purposes of the Green Belt, an assessment of the openness of the land and the contribution to the openness and special qualities of including land within the Green Belt which form the background to the designation was carried out. In assessing the open character of land parcels, and the land on the edge of settlements against the five purposes of including land within the Green Belt, consideration was also given to the urbanisation of the land over time and settlement pattern.

2.2.5 Sections 5 and 6 of the Review provide an overview of the history of the Oxford Green Belt and detailed commentary on the purposes of the Green Belt designation. Section 7 defines eleven land parcels in the existing Green Belt and a further two to the west of Abingdon. These land parcels form the basis of the assessment. Of particular interest to the Freeholder are land parcels P6 (Kennington and Radley Floodplain), P7 (Radley/Abingdon Floodplain) and P8 (Foxborough Hill and Radley Wood). Land parcel P6 contains the now omitted North Radley strategic allocation for 200 units; P7 contains the College's landholding at Gooseacre Farm and P8 contains the proposed North West Radley strategic allocation (up to 240 units) and the College's land at the triangular field off Radley Road (representations pertaining to this site are submitted on behalf of the College only, under separate cover).

2.2.6 Figure 5 of the Review, at page 67 of the document details the specific sites within each of the afore-mentioned land parcels that are recommended for further examination for potential exclusion from the Green Belt. The original North Radley allocation shown within the consultation version of the Plan is not recommended for release from the Green Belt by the Review. Green Belt Review: Phase 3 Report ? Amendments to Boundaries of the Green Belt around Inset Villages and New Inset Village at Farmoor

2.2.7 The Phase 3 report (Kirkham Landscape Planning and Terra Firma Consultancy) proposes alterations to the boundaries based on the contribution of edge of the settlement areas to the purpose of the Green Belt and its open character. The report notes that all of the areas are greenfield and open in character at the moment and that ??a cautious approach has been taken to limit recommendations for the removal of land in the Oxford Green Belt to those areas that are not considered, in the light of the tests set out in the Phase 2 report, to meet the purposes of the Green Belt.? The report presents a series of plans, one for each settlement, showing proposed changes to the Green Belt boundary accompanied by notes on the revised boundaries. Of particular interest to the College in the context of these representations are the following plans and comments: - Radley: Proposed Changes ? Areas 14 and 16 ? ??the boundaries at Radley have been revised in two areas. The new boundary of Area 14 [Gooseacre Farm] follows open farm tracks. The boundaries of Area 16 [proposed allocation North West of Radley] follow White?s Lane and Kennington Road.? For ease of reference, the appropriate extract is contained at Appendix 4.

2.2.8 As indicated in paragraph 2.2.6 above, the Phase 3 report does not propose the release of the North Radley site following its identification within land parcel P6 of the Phase 2 report. North Radley has subsequently been omitted from the Publication Draft of the Plan. The Freeholder has commissioned the production of a Landscape and Visual Appraisal which analyses this conclusion and sets out, inter alia, a further assessment of the manner in which the site fulfils a Green Belt function. The report will follow the submission of these representations. Council?s Response to the Green Belt Review ? Area 17 (Triangular Field)

2.2.9 The Council has published a response to the Phase 3 Green Belt Review, setting out its position on each of the sites assessed within the report. In respect of Area 17 it agrees with the findings of the Review, noting that: ?This parcel of land is not a logical part of the Green Belt as the built up area of the town to the north is entirely contained by Twelve Acre Drive. This site could be allocated in the Local Plan 2031 Part 2.?

2.2.10 The Freeholder fully supports the approach taken by the Council in respect of Area 17, i.e. its proposed release from the Green Belt for the detailed reasons set out in the College?s separate submission in relation to this site. Council?s Response to the Green Belt Review ? Area 16 (Gooseacre)

2.2.11 The Council makes the following comments in respect of Areas 16 (Gooseacre): ?Northern part of the site is a playing field and should be left as such. However land to the south of this could be allocated for development in the Local Plan 2031 Part 2 or beyond the plan period? (Area 16 ? Gooseacre)

2.2.12 The northern part of the Gooseacre site is within the College?s ownership. The Freeholder does not support the retention of playing fields in this location and as part of a holistic approach to an expanded Radley would prefer to see the playing fields and the existing village hall on the Gooseacre site relocated to the land at North Radley, near the existing primary school. The Freeholder suggests that this would create a more cohesive and accessible community hub, particularly given that Gooseacre is proposed for release from the Green Belt and could legitimately be brought forward for residential development as part of a high quality, comprehensive masterplanning proposal for the positive reconfiguration of Radley village. This development option is discussed further within Section 3 of this submission and in the supporting Vision documentation at Appendix 4. Council?s Response to the Green Belt Review ? Areas 14 (North West Radley) ?This site is a logical infill of Whites Lane. This constitutes the North West Radley strategic site shown in the Local Plan 2031 Part 1 February 2014 consultation document? (Area 14 ? North West Radley).

2.2.13 The Freeholder concurs with the Council?s view that North West Radley constitutes a logical infill off Whites Lane. Council?s Response to the Green Belt Review - North Radley

2.2.14 Within its response to the Green Belt Review, the Council deals explicitly with the North Radley site in paragraphs 24 ? 28. Paragraph 24 confirms that the Green Belt Review does not suggest the area to the north of Radley for release from the Green Belt ??because it is important in maintaining

the separation between Radley and Kennington and because it is an important part of the open countryside.?

2.2.15 Paragraph 25 states that ?In general, the council agrees with this assessment. However, we consider that a small part of land to the north of Radley can be released from the Green Belt and developed without significant harm on the separation of settlements or the open character of the area?We are therefore proposing a strategic site at North Radley. The site area is concentrated along Kennington Road so that the development is contiguous with the existing built form of Radley. The land to the east of the proposed site will be left open to maintain as much of the open countryside as possible.?

2.2.16 The Council goes on to note that Radley village as a whole is a sustainable location with its own services and facilities. The Council will recall that the Freeholder fully supported the release of the North Radley site from the Green Belt within their representations to the earlier consultation draft of the Plan, and the Freeholder concur with the Council?s general view that Radley village is an entirely sustainable location.

2.2.17 The Freeholder is disappointed to note that the Council has opted to omit the North Radley site from the Publication version of the Plan given the Freeholder?s view that the delivery of both North and North West Radley could deliver tangible benefits for the village in the short to medium term. Further comment in respect of the North and North Radley sites and the development options that the College is putting forward for consideration are provided in Section 3 of this submission.