

Stage 2 Matters and Questions**Matter 5 – Proposed Revision of Green Belt Boundaries (5.1)**

Para. 79 of the National Planning Policy Framework (NPPF) is clear that great importance should be attached to the essential openness and permanence of Green Belt land with *“the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open”*. Para. 83 then goes on to state that *“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan”*.

The February 2014 ‘Green Belt Review – Final Phase 2 Report’ (ref. NAT02) sub-divides the existing VoWH Green Belt into eleven individual parcels. Each parcel is then assessed against the five Green Belt purpose tests set out in para. 80 of the NPPF. Of the eleven parcels, all were considered to contribute to meeting at least two of the Green Belt purpose tests with only one parcel – no. 9 – not contributing towards meeting three or more.

Section 9 of the Green Belt Review then goes on to assess smaller land parcels on the edge of existing settlements against the five NPPF Green Belt purpose tests. This site specific Green Belt Review has resulted in the emerging Local Plan allocating four sites – strategic housing allocations 1, 2, 3 and 4 – for removal from the Green Belt and development for housing. It is evident from the parcel assessments included in the Green Belt Review that the parcels which contain the four proposed strategic housing allocations play an important role in both preventing the merging of settlements and safeguarding the countryside by keeping land permanently open:

Parcel 9 (allocations 1 and part of 2) – Most of the parcel other than that located to the west, is considered very important in preventing the merging of Wootton and Abingdon (pg. 55). Strategic housing allocation sites 1 and part of 2 are located on the edge of Abingdon in closest proximity to Wootton and will therefore inevitably result in the erosion of the perception of separation between the two settlements. Although the presence of the A34 is arguably an urban influence, the development of sites 1 and part of 2 will reduce the extent of open countryside between Abingdon and Wootton and will result in the sprawl of Abingdon to the north which is currently clearly contained and delineated by the Dunmore Road.

Parcel 8 (allocations part of 2 and 4) – The parcel is considered important in preventing the merging of four settlements being Oxford, Kennington, Radley and Abingdon and is largely undeveloped, being an important part of the countryside that characterises the western part of the Vale (pg. 55). Strategic housing allocation site 2 (part) is located on the edge of Abingdon in closest proximity to both Kennington and Radley and will therefore inevitably result in the erosion of the perception of separation between these settlements. The perception of amalgamation of Abingdon and Radley is further heightened by the allocation of strategic housing site 3 which, considered cumulatively with strategic housing site 2 (part), would effectively reduce the gap between the two settlements to one single field parcel.

Parcel 6 (allocation 3) – The southern part of the parcel is considered important in preventing the merging of Kennington with Radley as well as being an important part of the countryside defined by the River Thames as it extends south towards Abingdon (pgs. 54 / 55). Strategic housing allocation site 3 is located on the southern edge of Kennington and will result in the loss of an important open field parcel which defines the perception of openness between Kennington and Radley as well as bordering the route of the River Thames as it heads from Kennington to Abingdon.

Whilst the Green Belt Review considers that strategic housing allocations sites 1, 2, 3 and 4 have development potential, justified in Section 9 of the Review, this is justified based on the level of housing need in the VoWH which is the 'exceptional circumstance' required by para. 83 of the NPPF given that the land clearly does contribute to some of the main NPPG Green Belt purpose tests and particularly preventing the amalgamation of settlements.

It is evident from the Stage 1 Hearings and Hearing Statements that there is land located outside the Green Belt in the VoWH which is available, suitable, achievable and viable for housing development. Whilst housing need is clearly an 'exceptional circumstance' which justifies Local Authorities reviewing their Green Belt boundaries as part of the Local Plan preparation process, this must be undertaken sequentially and only when an Authority is satisfied that there is insufficient suitable land outside the Green Belt to meet full, objectively assessed need plus any Duty to Cooperate obligation.

We do not consider that the Council has fully explored the availability of land outside the Green Belt to accommodate housing, especially given that the Green Belt only covers a relatively small proportion of the VoWH being 40% of the Abingdon-on-Thames and Oxford Fringe Sub-Area. The VoWH Green Belt plays an integral role in preventing the urban sprawl of Oxford City and its amalgamation with settlements to the west and south. Its erosion should only be considered as a truly 'exceptional circumstance' when the Council has satisfied itself that no other non-Green Belt land that is suitable for housing is available for development. We also note that at this stage, the Local Plan is not looking to accommodate unmet housing need from Oxford City so the need to build housing in close proximity to Oxford as an 'exceptional circumstance' is not applicable.

As Green Belt coverage across the VoWH is by no means extensive, the Council does have opportunities to introduce new housing on land that is not located in the Green Belt. Land at Stockham Farm to the west of Wantage is a good example of available housing land being promoted through the Local Plan process which is outside of the Green Belt, located adjacent to one of the VoWH's principal and most sustainable market towns and that benefits from exceptional public transport links to Abingdon as per Core Policies 17-19 of the emerging Local Plan. Given the planned level of connectivity between Wantage and Abingdon / Oxford via public transport, it is not considered that exceptional circumstances exist to require housing to be developed on the edge of Abingdon in the Green Belt when non-Green Belt land is available to deliver significant numbers of new homes in a location, at Wantage, which is inherently sustainable as a stand-alone market town and benefits from exceptional road and public transport links to both Abingdon and Oxford.

We consider that the draft Local Plan has not adequately assessed the availability of land outside the Green Belt for housing and that insufficient 'exceptional circumstances' exist to justify the loss of land which contributes to a number of the main NPPF Green Belt purpose tests. Land is available located outside the Green Belt which is suitable, achievable and viable for housing development and benefits from excellent road and public transport connections to both Abingdon and Oxford. It is premature to seek to develop on Green Belt land until a comprehensive assessment of all available housing land in the VoWH is undertaken. We consider that the February 2014 SHLAA (ref. HOU09) was limited in scope with the Wantage appendix (ref. HOU09_24) being a good example, with land to the west of the main settlement not being considered as part of the assessment despite land to the east of the main settlement being fully assessed and subsequently included as a strategic housing allocation at Crab Hill (site 14).