

Green Belt sites.

The Vale Liberal Democrat Group agree with the detailed submissions made by the CPRE and other parishes and organisations concerned with finding creative housing solutions that also protect our open spaces. Many people have put in hundreds of hours of careful thought and consideration; their arguments are worthy of full consideration. Our comments are intended to provide some additionality to those comments and to add weight to them.

We would agree that in general terms the procedures used by the Vale and the level of consultation at all stages have been inadequate, incoherent and inconsistent. As an example, the review of the Vale's portion of the Oxford Green Belt was carried out in complete secrecy by a firm of consultants and then put on the Vale website without any publicity. In this instance, the first that local Councillors knew of what was being proposed (as in the case of Cllr Bob Johnston who represents Radley) in respect of sites 3 and 4 was when they stumbled on them on the website. This also applies more broadly to all the other local Councillors.

Matter 5, Proposed Revision of the Green Belt Boundaries

The main thing is that Green Belt designation and its protection has always been intended to be permanent. Guidance to Green Belt Policy is clear that housing need is not an adequate justification for development in the Green Belt. (In Vale's case, not even really, really big housing need is enough justification.) All of the Green Belt sites selected for housing satisfy Green Belt criteria; they prevent coalescence, and promote and encourage the redevelopment of brownfield sites within City boundaries.

The Leader of the Vale told Scrutiny Cttee last year that there were plenty of sites they could choose for strategic housing sites that aren't in the Green Belt, but none of them are sustainable. We contend that Green Belt land is by definition unsustainable for housing, because the very open essence of the land is lost forever.

Vale has not demonstrated the exceptional circumstances required by the NPPF paragraphs 79 to 86 to take sites out of the Green Belt. It would have been far better if the Vale had cooperated with the other District Councils and the County to carry out a comprehensive review of the whole of the Oxford Green Belt as happened in the case of the Cambridge Green Belt. If, as a result of a comprehensive review, a full EIP and an Inspectors Report, there were proposals for taking areas out of the Green Belt and putting them forward for housing, then we could have no complaint; it would be a fair, transparent and democratic process. That's is not what has happened in this case.

The 'local Green Belt Review' (para 5.40, p 62) was no such thing. It was a search for housing sites in the Vale's portion of the Oxford Green Belt. In paragraph 1.21, pages 16-17 of the Local Plan, Strategic Sites & Policies document, the Council sets out how the Vale Council will work with the County Council and the other Oxfordshire District Councils to complete an Oxfordshire-wide Strategic Green Belt Review. No land should be removed

from the Vale's portion of the Green Belt and no strategic sites should be allocated in Green Belt land until this review is completed satisfactorily.

We would draw attention to the fact that a part of Sites 1 and 2 to the North and North West of Abingdon was put forward for Green Belt removal at a very late stage, with no apparent consultation and not having been put forward by the consultants who had identified the other sites. It comes across as making it up as they went along; not a sound, coherent and consultative process.

Again as an additional comment we would contend that the way sites in the Oxford Green Belt within the Vale have been put forward has been haphazard and incoherent. You the Inspector asked many questions on this matter during Stage 1, which we feel Vale failed to adequately answer. Some of the Green Belt sites are simply not deliverable for housing. Examples include the playing fields at Botley, Kennington and Cumnor; these are in the ownership of Parish Councils who have made it clear that they have no intention of selling them. In order for playing fields to be sacrificed for development, there must be replacement sites available. In the case of Botley, Kennington and Cumnor, there are no alternative sites for playing fields. They should not be removed from Green Belt protection.

We believe this part of the Vale Local Plan is unsound and should be rejected. Some 40 other sites outside the Green Belt were identified by Vale Officers as possible housing sites. There is also the land at Didcot A power plant site, a brownfield that should be fully exploited before considering any Green Belt incursion. All these sites should be revisited and sufficient sites identified to complete any requirements set out by the Inspector in respect of the total housing in any final plan.

The SHMA figures were intended to be a baseline requirement. Vale should then have applied any constraints. At that point, the impact of Green Belt land on housing site availability should have been included as a constraint, but it wasn't. This made the housing figures unsound and led to a false conclusion that the best way to meet the need was to diminish the Green Belt. When questioned at Scrutiny and in full council, the senior planning officer argued that we HAD to accept the full SHMA figure as our target, because we 'obviously have enough land to meet the need'. We contend that if the only way we could meet that need was to develop inside the Green Belt, then the housing target should have been reduced, because housing need is not enough of a justification to develop in the Green Belt.

In conclusion, we think the Plan can be made sound, but only after substantial revision to remove housing sites from the Green Belt and reduce the number of houses we aspire to build accordingly. Remove the four allocated sites totalling 1,510 dwellings in the Oxford Green Belt (N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270) and reinstate to Green Belt designation the further 11 sites proposed for removal from the Green Belt. Delete all references to the 'local Green Belt Review'.