

VOWH LOCAL PLAN PART 1 EXAMINATION (STAGE 2)

HEARING STATEMENT

MATTER 5: PROPOSED REVISION OF GREEN BELT BOUNDARIES (INCLUDING CP13)

ON BEHALF OF REDROW HOMES

WORD COUNT: 2,897 (APPENDIX 1 NOT INCLUDED)

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Question 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?

- 1.1 At paragraph 83 the National Planning Policy Framework (NPPF) identifies that Green Belt boundaries can be altered in exceptional circumstances through the preparation of a Local Plan. We believe that local focus on the delivery of sustainable development and economic growth, in response to the nationally important Oxford and Oxfordshire City Deal (September 2014), provides a set of compelling exceptional circumstances which justifies the principle of Green Belt review. Furthermore, in our assessment the Council's evidence base provides a robust and reasoned justification to release land such as Site 3 (South Kennington) from the Green Belt.
- 1.2 In the context of achieving sustainable development, as set out across paragraphs 18-219 of the NPPF, the Council has taken the decision to review the Green Belt boundary within the district through the Local Plan preparation process. Paragraphs 7 and 8 of the NPPF identify the three roles of sustainable development (economic, social and environmental), these roles are considered to be mutually dependent by the government. Accordingly, any review of Green Belt boundaries and the wider preparation of a Local Plan must be undertaken in the context of all three strands of sustainable development.
- 1.3 Paragraph 10 of the NPPF outlines that plans and decisions need to take into account local circumstances, so that they respond to the different opportunities for achieving sustainable development in different areas. In the context of Paragraph 10, the Vale of White Horse, along with the other Oxfordshire authorities, have a key role to play in delivering economic growth on a nationally important scale, in the shape of the Oxford and Oxfordshire City Deal (January 2014).
- 1.4 The City Deal, agreed by the Government, outlines that despite Oxfordshire's wealth of world-class assets, it has underperformed. The Oxfordshire Innovation Report (2013) indicates that if Oxford had grown at the same rate as Cambridge between 1997-2011, £500m more GVA would have been created in the local economy. A key aspect of boosting the performance of Oxfordshire and increasing economic investment in the area must be the delivery of new housing development. Indeed, the City Deal states that the demand for housing in the

area has '*outstripped*' supply and the delivery of '*housing is essential for the future of the knowledge economy in Oxford and Oxfordshire*'. Fostering this particular centre of excellence is a priority of significance for the national economy which can only be achieved within Oxford and its environs.

- 1.5 In accordance with the requirements of the NPPF and Planning Practice Guidance (PPG), the Council has published an up-to-date and in our assessment robust SHMA and SHLAA. These two key evidence base documents provide the basis for the Local Plan strategy and upon implementation will allow the Council to fulfil its role in facilitating sustainable economic growth in order to support "*an economy fit for the 21st century*", as outlined in the NPPF at paragraph 20, and deliver the nationally important Oxford and Oxfordshire City Deal.
- 1.6 The SHMA (2014) has established the housing requirement arising across the Oxfordshire Housing Market Assessment (HMA), including the Vale of White Horse district. The outcome of this up to date assessment has informed the identification of the objectively assessed housing need for the district as required by paragraphs 159 and 47 of the NPPF. Accordingly this has been incorporated into the Local Plan as the objectively assessed housing need requirement. The Council's approach is compliant with the requirements of the City Deal which states that Oxford and Oxfordshire will commit to delivering '*the necessary sites that will meet the housing needs outlined in the SHMA*'.
- 1.7 The Sustainability Appraisal Report for the Vale of White Horse Local Plan 2031 Part 1 (October 2014) contains an assessment of a range of options and alternatives in respect of delivering the quantum and location of new housing development. Indeed, the Sustainability Appraisal assesses nine housing delivery scenarios ranging from 13,294 to 20,560 dwellings to be delivered over the plan period. Paragraph 12.3.13 of the Sustainability Appraisal states that,

"*A mix of sites are required that would deliver homes in the short as well as longer term to restore and maintain a five year housing land supply. Therefore in order to achieve this it has been necessary to consider sites in AONB and Green Belt.*"
- 1.8 The Council's approach to housing growth is clearly outlined in Chapter 11 of the Sustainability Appraisal. Indeed, Chapter 11 makes it clear that in pursuing the Council's preferred option for housing growth there would be '*trade-offs*', in

respect of socio economic impacts versus environmental impacts. However, the Sustainability Appraisal makes it clear that any perceived negative implications can be successfully mitigated. In light of the above, Redrow Homes consider that the Council's preferred option for housing growth has been evaluated against a range of potential alternative scenarios and developed for plan making purposes as it will contribute to the achievement of sustainable development as required by the NPPF and will deliver the positive economic growth initiative enshrined in the City Deal.

1.9 Redrow Homes therefore consider that there is a set of exceptional circumstances which clearly justifies **the principle** of Green Belt release. The Council's approach to release appropriate sites from the Green Belt, is supported by:

- The immediate need to deliver housing growth in order to support the aims and objectives of the Oxford and Oxfordshire City Deal, as agreed by Central Government in January 2014;
- The need to deliver economic growth in Oxfordshire, which is of national importance. In particular, the City Deal will:
 1. *Invest in a network of innovation and incubation centres which will nurture small businesses;*
 2. *Accelerate the delivery of 7,500 homes across the county;*
 3. *Enable the delivery of three new transport schemes at the Enterprise Zone, Northern Gateway and the first phase of the 'Science Transit';*
 4. *Deliver 500 new apprenticeships for young people;*
 5. *Provide £95m of local and national public sector investment with a further £550m of investment from housing providers;*
 6. *Deliver nearly £600m of private sector investment; and*
 7. *Create 18,600 new jobs and a further 31,400 jobs during the construction phase.*
- The requirement for the planning system to deliver all three dimensions of sustainable development (Paragraph 7 of the NPPF);

- The need for Plans and decisions to take into account local circumstances in order to achieve sustainable development (Paragraph 10 of the NPPF);
- The need for the planning system to be genuinely plan led (Paragraph 17 of the NPPF);
- The need to ensure that planning proactively drives and supports sustainable economic development to deliver the homes, employment opportunities and thriving local places that the country needs (Section 39 of the Planning and Compulsory Purchase Act 2004 and paragraphs 14, 17 and 84 of the NPPF);
- The need for local planning authorities to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative, high tech industries (paragraph 21 of the NPPF)
- The need for local planning authorities to plan for economic growth in order to develop an economy fit for the 21st century (paragraph 20 of the NPPF).

1.10 Redrow Homes consider that the Council's approach is consistent with the requirements of paragraph 10 of the NPPF which outlines the need for Plans 'to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. The Spatial Strategy outlined in the Local Plan is considered to be a sound, positive and proactive approach to meeting the Council's full objectively assessed need, meeting the requirements of Paragraph 47 and 182 of the NPPF. The City Deal responds to the Government's commitment to securing economic growth set out at paragraph 18-20 of the NPPF and a review of existing Green Belt boundaries should be seen in this context, providing the basis for the identification of exceptional circumstances referred to at paragraph 83 of the NPPF.

1.11 The Oxfordshire Green Belt was defined many years ago and the opportunity can now be taken through the preparation of the Local Plan to refresh those existing Green Belt boundaries, within the context provided by paragraphs 80 and 83 of the NPPF. The Local Plan is underpinned by the VoWH Green Belt Review Final Phase 2 Report. The VoWH Green Belt Review, produced independently on behalf of the Council, presents a sound and sustainable strategy to assess the integrity of land on the edge of settlements and the extent to which this land satisfies the five purposes of Green Belt as outlined in Paragraph 80 of the NPPF. The Green Belt Review confirms that,

"The Oxford Green Belt has remained predominantly intact since it was approved in 1975. As set out in the NPPF, production of the new Local Plan 2031 Part 1 is the appropriate time to consider whether exceptional circumstances have arisen that warrant alterations to the general extent of the Green Belt."

- 1.12 The Local Plan is shaped by the requirement to meet objectively assessed housing needs, which responds to the aims and objectives of the City Deal, and robust evidence that can be tested. Small and focused Green Belt review, in combination with delivering other non-Green Belt sites, will make a material contribution to meeting objectively assessed housing need and accommodating economic growth. The policy advocated in the Local Plan still protects those areas making a meaningful contribution to the achievement of Green Belt purposes. Redrow agrees with paragraph 5.42 of Local Plan which states,

"Some of the sites identified as strategic allocations within this plan have been historically located within the Oxford Green Belt..... The sites all fall within land that has been identified through the local Green Belt Review to no longer meet the purposes of the Green Belt".

- 1.13 Redrow Homes support the content of Core Policy 13, wherein the Council states that it is proposing to release land from the Green Belt to accommodate strategic development at a number of locations in the Abingdon-on-Thames/Oxford Fringe Sub-Area, including South of Kennington **(identified as Housing Allocation Site 3 in Stage 2 – Matters and Questions)**. The proposed release of land from the Green Belt has been informed by the VoWH Green Belt Review Final Phase 2 Report (February, 2014), which incorporates an assessment of the role that tracts of land play in addressing the stated purposes of including land within the extent of a Green Belt.

- 1.14 The VoWH Green Belt Review Report recommended that location 13 (South Kennington – Site 3), within P6: Kennington and Radley Floodplain, should be released from the Green Belt. The South Kennington site is well contained by the existing settlement, does not form part of the wider countryside and does not exhibit the particular characteristics required to retain land in the Green Belt. The Council's Site Selection Topic Paper states the following in respect of the Green Belt designation at South Kennington *"the Green Belt review indicates that the site can be developed without threatening the integrity of the Oxford Green Belt"*. Accordingly, Redrow Homes endorse the proposed release of sites from the

Green Belt in order to deliver sustainable development and meet the identified housing need in the district. Indeed, the release of sites from the Green Belt, such as location 13, and subsequent delivery of housing development, is of critical importance in order for the Council to maintain a robust five year housing land supply moving forward in order to support the exceptional economic requirements of the area.

1.15 The Sustainability Appraisal Report for the Vale of White Horse Local Plan 2031 Part 1 (October 2014) contains assessments of various sites presently located within the Green Belt. The Summary contained within the Sustainability Appraisal: Appendix 12 states that South Kennington (Site 25) is one of only two locations deemed to exhibit *"a high capacity for development and would have no negative effect on the Green Belt or landscape."* Indeed, the Appendix 12: Summary states that Site 25 is one of only three locations described as *"the best performing sites (i.e. those with no significant adverse effects)."*

1.16 In October 2015, the Oxford Green Belt Study (OBGS) was published by Oxfordshire County Council. The Study, produced by LUC, provides a countywide assessment of the Green Belt. This Study has been published in the context of the need for Oxfordshire authorities to discharge their Duty to Co-operate in respect of addressing any unmet need arising from Oxford City. The Oxfordshire authorities, via the Oxfordshire Growth Board, have agreed to a strategic work programme of projects, including the OBGS, to build up a county wide spatial strategy. It is the intention that this strategy will inform the distribution of new housing through the review of Local Plans, as explained at paragraph 1.9 of the Study;

"These projects, including this Green Belt Study, will culminate in the agreement of a new housing distribution for Oxfordshire. That agreed distribution will then be taken forward in subsequent Local Plan Reviews by the individual District Councils."

1.17 Accordingly, it is considered that the Oxfordshire Growth Board, through the OBGS, is proactively planning to address any outstanding housing need arising from Oxford City. This approach is entirely in accordance with Core Policy 2 of the publication VoWH Local Plan, in that VoWH District Council are committed to undertaking an early review of the Local Plan to address any outstanding housing need. Redrow Homes also notes that paragraph 5.41 of the publication Local Plan

states that the VoWH Green Belt Review, supporting the Local Plan, does not preclude a further Green Belt Review (strategic in scale), should this be needed to meet any identified unmet housing need within the Oxfordshire Housing Market Area.

- 1.18 In light of the above it is clear that the OBGS does not supersede the VoWH Green Belt Review, nor does it intend to. Nevertheless to aid the examination process the Pegasus Landscape team has reviewed the content of the OBGS, paying particular attention to the proposed South Kennington allocation (see Appendix 1).
- 1.19 In conclusion, the consideration given to Green Belt issues in the Sustainability Appraisal, the VoWH Green Belt Review (all Phases) and subsequent Council commentary on the VoWH Green Belt Review in associated Topic Papers, has clearly concluded that South Kennington represents an area of land that can be released from the Green Belt, without undermining its strategic purposes, as it is not necessary to keep it permanently open. At the same time, the identification of South Kennington as an allocation in the Local Plan will secure consistency with the NPPF requirements for sustainable development. Our assessment of the Council's evidence base indicates that the appropriate process has been followed through the preparation of the VoWH Green Belt Review Final Report and Sustainability Appraisal.
- 1.20 Paragraph 83 of the NPPF readily acknowledges that the plan making process can incorporate the review of existing Green Belt boundaries in exceptional circumstances. Redrow Homes believes that the matters set out above represent exceptional circumstances and warrant a review in the district. The review which has been carried out is robust and sound.

Question 5.3 - Does the plan adequately identify the revisions to the Green Belt boundary that it proposes?

- 1.1 In our assessment the Draft Policies Map for the Abingdon and Oxford Sub Area adequately identifies Site Allocation 3, South Kennington.

Question 5.4 - Is policy CP13 soundly based?

1.1 As presented in our answer to Question 5.1, in our assessment of the Council's evidence, when viewed as a whole, clearly demonstrates the exceptional circumstances to justify the principle of Green Belt release. Central to this is the Council's ambition to deliver the nationally important Oxford and Oxfordshire City Deal. The VoWH Green Belt Review and the Sustainability Appraisal have identified sites which are suitable for release from the Green Belt, including Site Allocation 3 (South Kennington), in the context of the paragraphs 79-86 of NPPF and the need to deliver Local Plan objectives and the nationally important Oxford and Oxfordshire City Deal.

1.2 In conclusion, it is strongly considered that Policy CP13 is:

- positively prepared to ensure the delivery of the Council's full objectively assessed housing need, whilst fully respecting the social and environmental dimensions of sustainable development.
- justified by the Local Plan strategy and associated evidence base;
- effective in that it will assist in the delivery of the housing required to support nationally important economic growth (the Oxford and Oxfordshire City Deal) over the course of the plan period; and
- consistent with the requirements of the NPPF to deliver sustainable development.

APPENDIX 1 – A REVIEW OF THE OXFORD GREEN BELT STUDY (LUC, October 2015) PRODUCED BY PEGASUS LANDSCAPE

- 1.1 The Oxfordshire Green Belt Study (OGBS) was prepared by LUC on behalf of the Oxfordshire Local Authorities and published in October 2015. This County wide study comes only 18 months after the Green Belt Review for the Vale, prepared on behalf of the LPA by Kirkham Landscape Planning, published in February 2014.
- 1.2 The purpose of both documents is to assess and review the extent to which land in the respective study areas meets the five purposes of green Belt (as defined by the NPPF).
- 1.3 As an overarching document for the County, the OGBS includes a comparison between its approach and the approach of other Green Belt reviews including that of the VoWH and also extending to similar studies prepared for Oxford City Council and for South Oxfordshire.
- 1.4 A key difference between the OGBS is how the land cover parcels in the study area were derived. The OGBS states that:

"3.6 ...Parcels were defined using GIS maps (based on Ordnance Survey and Mastermap), local proposals maps and aerial images. No maximum or minimum sizes were used for the land parcels. The aim was to define parcels that contain land of the same or very similar land use or character, bounded by recognisable features including:

- Natural features; for example, substantial watercourses and water bodies.*
- Man-made features; for example, motorways, A and B roads and railway lines, and established infrastructure and utilities such as sewage treatment works.*

3.7 Parcels were defined independently from the previous or ongoing Green Belt studies in Oxfordshire. This ensured independent, comprehensive, and consistent approach."

- 1.5 The differences in approach to defining land cover parcels has led directly to variations between the findings of the studies. Referring to the VoWH GBR the OGBS acknowledges that:

"4.18 The findings of the studies are broadly comparable to the Oxford Green Belt Study. However there are some methodological differences which have led to some variations in the study findings. These variations relate to differences in the land parcels used for assessment and/or differences in the assessment criteria....

4.19 Vale of White Horse Green Belt Review - Phase 1 and 2 identifies 11 large land parcels within the Green Belt. These were identified using two key factors - landscape units of a well-defined character and linear boundaries which are readily visible on the ground. The study provides commentary on the relative performance against the Green Belt purposes of different sections of these parcels. Phase 3 identifies much smaller land parcels where it is suggested there is scope for amendment of the Green Belt boundary. The difference in size and boundaries of the land parcels used for the Vale study makes it difficult to directly compare the findings with this Study."

- 1.6 The OGBS goes on to provide additional comparisons between the approaches to assessing areas against the five purposes of the green belt. In its summary the OGBS states that:

"4.35 These methodological differences have led to some variations in the findings of the studies. The key differences have resulted from variations in the parcels assessed..."

- 1.7 The aim of the OGBS was to define land cover parcels independently from other studies so as to ensure independence, however it has instead generated some difficulties and inconsistencies in drawing conclusions on where and how land functions in relation to the purposes of the Green Belt. Throughout its approach, the OGBS acknowledges that further, more detailed site specific assessment against the strategic purposes of Green Belt would be required.

- 1.8 The site allocation at South Kennington is located in a land cover parcel defined by the OGBS as KE1. This land cover parcel extends to the west and north, occupying the wooded slopes and hills which contain this western edge of Kennington. Whilst the OGBS aimed to define parcels containing land of the same

or very similar character, this parcel is artificially truncated by the alignment of the A34, with the wooded slopes extending much further to the west.

- 1.9 Furthermore, it is not clear why the site allocation at South Kennington is included in KE1 rather than RA1 (immediately to the south) where there is greater consistency in terms of its arable land use, scale of field pattern and characteristic vegetation cover. A more robust boundary to the south-eastern edge of the KE1 land cover parcel would be to use the alignment of Kennington Road (rather than the railway further east), which would then retain a clear distinction in character between KE1 and RA1 and would avoid the use of sub-variations and caveats which have crept into the analysis for KE1 (for example in relation to the OGBS analysis of the setting of the town, issue 4).
- 1.10 Clearly the site allocation at South Kennington sits in an area which can be interpreted as transitional; the variations between the analysis of each of the studies reflect the issues identified in the OGBS where it notes that the slight differences in approach has led to variations in findings between studies. In relation to the site allocation, examples of such variations are described below.
- 1.11 Firstly, a more consistent approach to the use of character would ensure a clear distinction between land cover parcels KE1 and RA1. In relation to issues of 'checking unrestricted sprawl' KE1 is assessed as 'medium' and 'high' (where the parcel 'performs moderately well' or 'well', respectively); despite its similarity in terms of character (including land use, landform, vegetation structure and influence by the existing settlement edge and railway) RA1 is determined to 'not contribute'.
- 1.12 Secondly, in assessing the purpose of Green Belt relating to preventing coalescence, the OGBS assesses the reduction in visual and physical gaps between settlements (issue 2a). For land cover parcel KE1 and the potential reduction in physical and visual gaps between Kennington and Radley, the assessment notes that there is potential for long distance views from high ground to the east and that from these, whilst the gap would not be removed, it would be reduced. However, notwithstanding the consistency in landscape character between the site allocation and land cover parcel RA1, the assessment notes that in RA1 the settlements (South Kennington and Radley) are separated from each other by several large, arable fields and that hedgerows with trees prevent any direct inter-visibility, and there is some distance between the settlements, so

there is scope for some loss of openness without a resultant substantial reduction in the gap.

- 1.13 As part of a finer grained assessment (Phase 3) the VoWH Green Belt Review includes a more detailed, specific assessment for the site allocation and therefore addresses its specific context in relation to the settlement edge to the immediate north and west, and the wider landscape context to the south and south-east. This more detailed assessment provides a greater degree of transparency than the strategic overview for the larger land cover parcels. This provides more targeted consideration of how the site allocation functions and performs in relation to the purposes of the Green Belt on this edge of South Kennington.