

Further comments from Radley Parish Council: 2 October 2015

Changes to Oxford Green Belt

1. The information provided in the Vale's latest paper confirms our concern that the Vale has no adequate contingency plan to contribute to meeting Oxford's unmet housing needs, and that the Local Plan spatial strategy is likely to need fundamental re-thinking when Oxford's numbers are finalised.

2. The sites listed in the table to the Vale's paper as recommended for removal from the Green Belt add up to 244 hectares. However, they include:

- 105 hectares already designated as strategic sites (R,U,V,W, part Q)
- 42 hectares in sites disagreed by the Vale for removal from the Green Belt on grounds that they were unsuitable for development – see Vale paper *VOWHDC Comments on Green Belt Review*, February 2014, herewith for ease of reference (C,D,F,G,O,P)
- 22 hectares on Radley parish sites which are not available to deliver net housing gain. Site Q includes c. 20 hectares currently occupied by c. 300 mobile homes. Site S includes some 2.5 hectares currently in use as playing fields.

3. The residual amount which might be made available for additional housing provision is 73 hectares – see table attached. Applying the same Green Belt release to number of new houses ratio as applies to the strategic sites in the list (ie 105 hectares: 1510 dwellings) suggests that these sites might provide for 1050 new homes. After contributing to the Local Plan target for Part 2 allocations in the Abingdon/Oxford fringe sub-area (722 homes), these sites will be sufficient to provide for less than 500 new homes to meet Oxford's unmet need. This number represents only a small proportion of the needs anticipated in recent Vale documents.

4. It is also worth noting that strategic site U (17.6 hectares) was not recommended for removal from the Green Belt by the Kirkham Review, and will be contested on those grounds at Stage 2 of the Inspector's hearings.

Vale response to Inspector's queries on Matter 2

5. Paragraph 2.2 of the Vale's paper states that the ambition is still for 100,000 space sector jobs and that 5% will be at Harwell. We would like to draw attention to the fact that page 21 of the CE/SQW report it implies that 10% will be in or around Harwell.

Location	Land parcel ¹	Parcel size (hectares)	Area available for additional development (hectares)	Comments ²
Botley	A	8.18	8.18	
	B	1.92	1.92	
	C	10.79	0	Disagreed by Vale for removal from Green Belt. Incorporates playing fields. Sloping site
	D	3.45	0	Disagreed by Vale. Noise alleviation required+ too narrow to accommodate development
Cumnor	E	9.19	9.9	
	F	8.89	0	Disagreed by Vale. Part of Conservation area.
	G	9.54	0	Disagreed by Vale. Part of Conservation area.
	H	5.48	5.48	
	I	6.79	6.79	
	J	5.35	5.35	
Appleton	K	3.42	3.42	
	L	4.62	4.62	
Wootton	M	10.95	10.95	
	N	7.91	7.91	
Kennington	O	2.2	0	Disagreed by Vale. In use as playing fields
	P	7.17	0	Disagreed by Vale. In use as playing fields.
	(Radley parish) Q	31.08	0	Strategic site + mobile home parks
Radley	R	13.84	0	Strategic site
	S	10.57	8.5	Includes playing fields to be retained
	Abingdon T	1.88	1.88	
(Radley parish)	U	17.64	0	Strategic site <u>not</u> recommended for release from GB by Kirkham Rev.
	V	15.56	0	Strategic site
	W	14.91	0	Strategic site
	X	32.39	0	Strategic site
Total area		243.72	74.9	

¹ Sites are as listed in table attached to Vale paper: *Local Plan Part 1 Hearing. Summary note on changes to Oxford Green Belt.*

² Vale views are as recorded in Vale paper: *Vale of White Horse comments on Green Belt Review: Feb 2014*

Vale of White Horse District Council's comments on the Green Belt Review

Introduction

1. This report sets out the Vale of White Horse District Council's reasons for commissioning a Green Belt Review and proposal to allocate sites for release from the Green Belt. The Green Belt Review was split into three phases:
 - Phase 1 – assessment of the land around the main settlements (inset to the Green Belt) against the five purposes of the Green Belt as set out in paragraph 80 of the National Planning Policy Framework (NPPF) and recommendation of areas that could be released from the Green Belt following more detailed examination.
 - Phase 2 – following on from Phase 1, assessment of the remainder of the land in the Green Belt examining the other settlements and whether they contribute to the openness and open character of the Green Belt, assessing whether the Green Belt could be extended to the south and providing advice on increasing the beneficial uses within the Green Belt. Phase 1 and 2 were incorporated into the same report.
 - Phase 3 – More detailed examination of the areas suggested for release in Phase 1, setting out the boundaries for the sites to be released. This is a separate report from the Phase 1 & 2 report.
2. This report responds to the recommendations set out in Green Belt Review Phases 1 & 2, February 2014 and the Green Belt Review Phase 3 Report, February 2014. These recommendations will be consulted on between 21 February – 4 April 2014 (www.whitehorsedc.gov.uk/localplanpartone). Following a review of the consultation responses we will confirm which sites are suitable for release from the Green Belt. We will include any revision to the Green Belt boundary in the Pre-submission Local Plan, which we intend to publish in mid 2014.

Rationale for reviewing the Green Belt

3. The February 2013 Local Plan 2029 Part 1 consultation document identified three sub areas within the district: the Abingdon on Thames and Oxford Fringe Sub-Area, in which the Green Belt is located; the South East Vale Sub-Area, which was the main focus for development in the district; and, the Western Vale Sub-Area, which is more rural in character.

4. The 2013 consultation document did not allocate any strategic development to the Abingdon-on-Thames and Oxford Fringe Sub Area, largely because of the constraints of the Green Belt.
5. Despite the Green Belt constraint, the larger villages in the Green Belt (Kennington, Cumnor, Wootton and Radley) are some of the most sustainable locations in the Vale, with high scores in the Town and Village Facilities Study (February 2014) update. Abingdon-on-Thames is the district's largest town and it has the greatest need for Affordable Housing but is constrained to the north, west and east by the Green Belt and to the south by existence of the River Thames Floodplain and its tributaries. The presence of the Green Belt means that some of the most sustainable settlements in the district are unable to grow, which increases problems with housing provision and puts more pressure on less sustainable locations outside of the Green Belt.
6. In recognition of this, the consultation draft Local Plan 2029 Part 1 from February 2013 stated that first consideration would be given to the Abingdon-on-Thames and Oxford Fringe Sub-Area should additional sources of housing supply need to be identified in the plan period, providing growth could be sustainable accommodated.
7. The updated Oxfordshire Strategic Housing Market Assessment (SHMA) has identified an objectively assessed need for up to 20,560 homes. This is an increase of around 7,400 homes from our February 2013 consultation. To accommodate this growth we need to identify additional sites. The main focus for growth in the Vale is still the South East Vale Sub-Area. However, to meet our housing target we need to look for sites across all three sub areas.
8. Work began on the designation of the Oxford Green Belt in 1956 but the outer extent of it was not approved until 1975. It was the 'Oxford Fringe and Green Belt Local Plan' adopted March 1991 that set the boundaries around the villages in the Vale. These boundaries were drawn tightly around the settlements allowing for little expansion.
9. It is clear that when the boundaries were drawn around the villages there was little consideration given to future need to expand the villages, even though advice at the time was to consider growth needs beyond the plan period. The Green Belt villages have therefore remained relatively unchanged for over twenty years and probably longer given there was a general presumption of restraint in the area since the outer boundary was set.
10. The government has made it clear that whilst there is to be no change in the protection provided by the Green Belt, local councils are encouraged to review and tailor the extent of the Green Belt in their local area to reflect local circumstances.¹ The mechanism for

¹ Green Belt Standard Note SN/SC/934 to Members of Parliament, update 21 January 2014

reviewing the Green Belt is 'through the preparation or review of the Local Plan'²

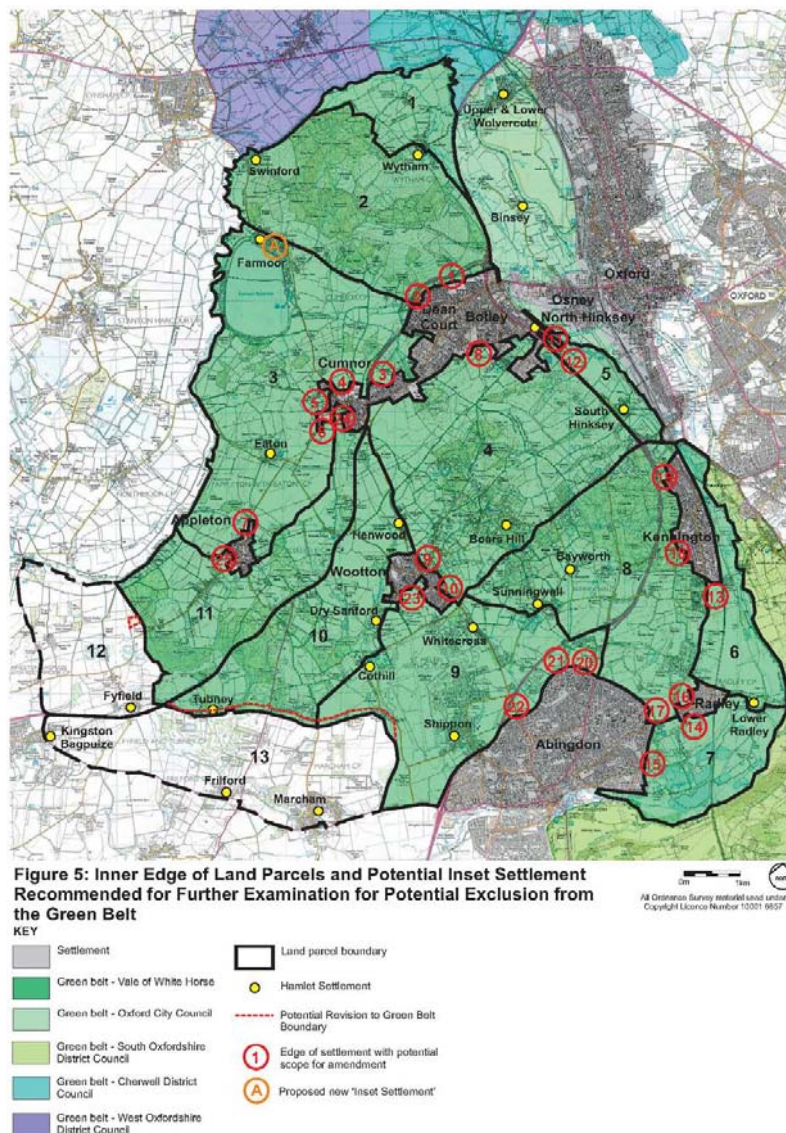
11. Given that growth in the settlements within the Green Belt had been restricted for so long and as these settlements are some of the most sustainable in the district, a Green Belt Review has been undertaken to ascertain if any land could be released from the Green Belt.
12. The National Planning Policy Framework (NPPF), paragraph 80 sets out five purposes of the Green Belt, which have remained much the same throughout the history of the designation:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
13. The Oxford Green Belt was designated to prevent urban sprawl from Oxford. However, the main purpose of the Green Belt designation in the Vale of White Horse district is to preserve the rural and historic setting of Oxford. The Green Belt review assesses, in the first instance, the contribution land around the main settlements in the Green Belt makes to the five purposes of the Green Belt. This information was then used to decide if any land could be taken out of the Green Belt without harming its designation.

Phases 1 & 2

14. The Phase 2 report, Figure 5, shows 25 areas where it is considered land makes less of a contribution to the Green Belt and further examination should be undertaken to ascertain if land should be released. The council does not agree with the findings for area 12, North Hinksey and area 15, east Abingdon. These two areas were suggested not to be taken forward for further review as part of the Phase 3 study.

² Paragraph 83, National Planning Policy Framework

Figure 5 – Extract from Phase 2 Green Belt Review



15. Area 12 is in a sensitive location separating the city of Oxford from its rural hinterland. This area needs to remain protected as part of the Green Belt to prevent Oxford City spreading.
16. The eastern edge of Abingdon is contained by Audlett Drive, which makes a logical edge to the Green Belt. Any development beyond the boundary of this road would be encroachment into the open countryside.
17. Part of the brief for the Green Belt Review was to assess the southern boundary to ascertain if any additional land should be included in the Green Belt. The report suggests a minor change to the southern boundary so that it follows physical features. The council are minded to revise the boundary as suggested in the report so that the boundary is more clearly defined.

18. The brief also required the report to examine ways to positively enhance the beneficial use of the Green Belt, as suggested by paragraph 81 of the NPPF. The report found that in general the Oxford Green Belt performs well in terms of sport and recreation provision, biodiversity and landscape. Suggestions are made for policies and strategies that could improve the beneficial uses of the Green Belt. The land use elements of the suggestions will be incorporated into Local Plan 2031 Part 1 and Part 2.

Phase 3 Report

19. The Phase 3 Report further examined the areas where land made less of a contribution to the five purposes of the Green Belt and defined suitable land parcels for release from the Green Belt. Appendix 1 contains map extracts from the Phase 3 report showing these land parcels. The suggested boundaries, wherever possible, follow physical features that are readily recognisable and likely to be permanent, as advised by paragraph 85 of the NPPF. The assessment does not consider the use of the land or whether part or all of the site would be suitable for development, it is purely an exercise in considering the five purposes of the Green Belt.
20. Paragraph 83 of the NPPF states that where Green Belt boundaries are reviewed, this should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. On this basis, we have considered releasing land from the Green Belt other than for the strategic sites, where the review shows that the five purposes are not met.
21. Even though land is suggested for release from the Green Belt, which is not identified for strategic development, this does not necessarily mean that development would be appropriate or supported at these locations. However, the sites may be reviewed during preparation of Local Plan 2031 Part 2 (LPP2), which will identify small (non strategic) development sites. Work will begin on LPP2 once LPP1 is adopted.
22. 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.
23. The council's response to each of the sites is set out in Table 1 below. The council's recommendations are included in the February 2014 Local Plan 2031 Part 1 consultation. Following a review of responses

from the consultation, we will confirm which sites should be released from the Green Belt and set this out at the Pre-Submission consultation in mid 2014.

Table 1: the council's response to the Phase 3 Green Belt Review Report

Settlement	Land ID for release in the Green Belt Review	Council's Response to recommendation for release from the Green Belt	Comment
Abingdon on Thames	17	Agree	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.
	20, 21 & 22	Agree	These sites are well contained by the A34 and are a logical extension to Abingdon-on-Thames. It is the district's largest town; therefore it is a highly sustainable place for development. These sites comprise the North Abingdon on Thames and North West Abingdon on Thames strategic sites shown in the Local Plan 2031 Part 1 February 2014 consultation document.
Appleton	7 & 25	Agree	Whilst the emerging Local Plan 2031 does not seek to allocate development within smaller villages, it is conceivable that smaller villages will want to grow in the future.
Botley	1 & 2	Agree	The A420 provides a clear boundary to the Green Belt in this location. These sites could be allocated in the Local Plan 2031 Part 2 or beyond the plan period.

	8	Disagree	This site incorporates playing fields, which the council would not support for redevelopment unless alternative provision was made. The land in the vicinity of the site is sloping and therefore would not be appropriate for alternative provision.
	11	Disagree	Noise attenuation would be required (due to proximity to A34) and the strip of land would be too narrow to accommodate development and an environmental buffer. On this basis, releasing the land from the Green Belt would serve no purpose.
Cumnor	3	Agree	The A420 provides a clear boundary to the Green Belt in this location and the site is well contained in the landscape. This site could be allocated in Local Plan 2031 Part 2 or beyond the plan period.
	4 & 5	Disagree	These sites are located in the Cumnor Conservation Area. The Cumnor Conservation Area Character Appraisal specifically refers to them as important to the character of the Conservation Area. On this basis, these sites would not be supported for development and therefore removing them from the Green Belt would serve no purpose.
	24 & 6	Agree	These sites are well contained by the built form

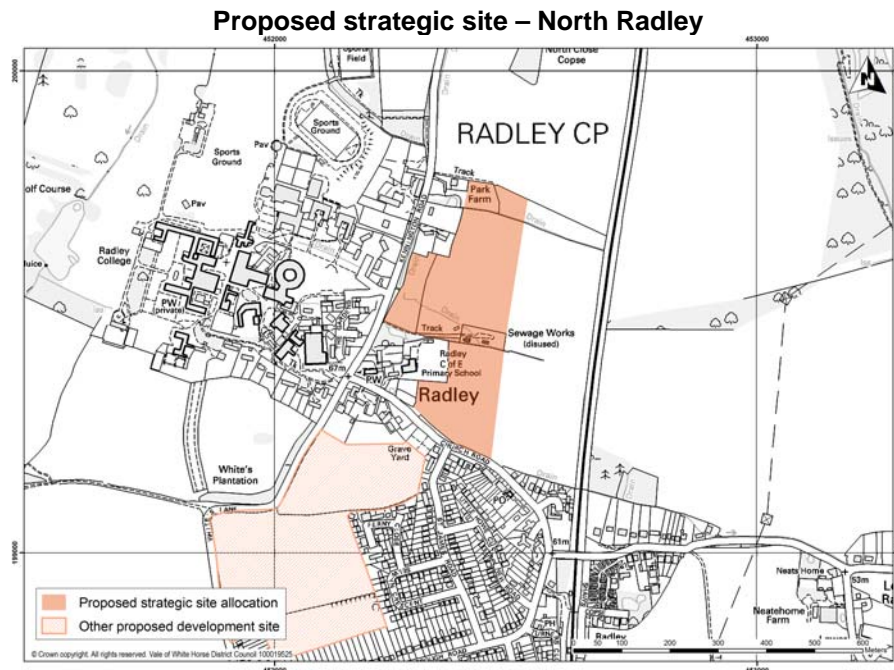
			and would not extend the settlement further along the roads. These sites make up the South Cumnor strategic site shown in the Local Plan 2031 Part 1 February 2014 consultation document.
Farmoor	A	Agree	The boundary for the inset should be drawn tightly around the built form.
Kennington	13	Agree	This site performs well in Green Belt and landscape terms and would be appropriate for development. Part of this site makes up the South Kennington strategic site shown in the Local Plan 2031 Part 1 February 2014 consultation document.
	18 & 19	Disagree	These sites are playing fields, which the council would not support for redevelopment unless alternative provision was made. There is no other land available for alternative provision in Kennington and on this basis, releasing this land from the Green Belt would serve no purpose.
Radley	14	Agree	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 Local Plan 2031 Part 2 or beyond the plan period.
	16	Agree	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.
Wootton	9	Agree	Site is well contained by the existing built development of the village and by Old Wootton. The site could be allocated for development in Local Plan 2031 Part 2 or beyond the plan period.
	10	Agree	Site is a logical extension of the settlement along Lamborough Hill. This constitutes the East Wootton strategic site shown in the Local Plan 2031 Part 1 February 2014 consultation document.
	23	Agree	Site is well contained by existing built up village. The site could be allocated for development in Local Plan 2031 Part 2 or beyond the plan period.

Allocation of North Radley

24. 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.
25. In general, the council agrees with this assessment. However, we consider that a small parcel of land to the north of Radley can be released from the Green Belt and developed without significant harm on the separation of the settlements or the open character of the area.
26. We are therefore proposing a strategic site at North Radley. The site area is concentrated along the 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 character of the area as possible.

27. The area suggested for development does not extend any closer to Kennington that the existing built form and therefore does not contribute to coalescence of the settlements.
28. Radley is a sustainable location for development with its own services and facilities as well as excellent bus links to those in Abingdon-on-Thames and Oxford. The village also has a railway station that provides further access to the city of Oxford.



Appendix 1 – Maps from Phase 3 Report

