

HEARING STATEMENT MATTER 6

Green Belt (strategic)



South Oxfordshire
LOCAL PLAN 2011-2035
www.southoxon.gov.uk/newlocalplan

Question 6: Does the plan take a sound approach towards Green Belt and other environmental constraints?

Council Response:

1. Yes, the Plan's approach to Green Belt and other environmental constraints is sound. The key policies that are relevant to Green Belt are:
 - Policy STRAT1: Spatial Strategy;
 - Policy STRAT4: Strategic Development;
 - Policy STRAT6: Green Belts; and
 - strategic site policies STRAT8-STRAT14.

2. The key policies that are relevant to other environmental constraints (related to the footnote in paragraph 11 of the National Planning Policy Framework [\(NPPF\)](#)) are:
 - Policy STRAT1: Spatial Strategy;
 - Policy STRAT4: Strategic Development;
 - Policies ENV1-12;
 - Policies EP1-5; and
 - Policy DES8 Efficient use of Resources.

3. The Plan contains sound proposals for the environment which will protect and enhance what is special about the District. When making site allocations, all reasonable alternative options have been explored (see our Matter 5 statement). This included the scope for meeting needs in other ways, such as increasing densities and re-using land. Brownfield sites have been assessed and prioritised and form part of our strategy and allocations; significantly higher densities have been proposed in Policy STRAT5; and alternative larger strategic sites have been re-assessed with a lower threshold of just 500 dwellings capacity (as opposed to the Oxfordshire wide 1,500 strategic site threshold) and discounted because they could not bring forward the delivery of the sites with the necessary infrastructure to support sustainable development. Our neighbouring authorities are reviewing

their Green Belt boundaries to meet their own needs and Oxford's unmet housing need. The key evidence documents (the Sustainability Appraisal ([CSD04.2](#)), the Oxfordshire Strategic Housing Market Assessment 2014 ([HOU05](#)) the Strategic Housing and Economic Land Availability Assessment ([HOU01](#)), and the Site Selection Background Paper Part 2 ([TOP06.1](#))) are comprehensive and demonstrate that in the absence of any reasonable alternative, the release of Green Belt land for development is needed for the Plan period and beyond to provide land to facilitate the sustainable development of the District.

Question 6a: What are the strategic level exceptional circumstances for the release of this quantity of land from the Green Belt? (The local level circumstances will be dealt with under each of the strategic sites.)

Council Response:

4. The proposed release of land from the Green Belt is justified by:
 - i. the District's high housing need (including its affordable housing need);
 - ii. the inability of Oxford City to meet its own housing needs; and
 - iii. planning for economic development and recovery (a new justification arising from COVID-19).

There is a detailed explanation of the strategic level exceptional circumstances (i and ii) in our Green Belt Topic Paper ([PSD07](#)) (Section 2, pages 9-12) and our response to Question 3 in [IC1A](#) (pages 9-11).

5. We have given particular consideration to the acuteness of the objectively assessed need for new housing in the District, as set out in the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 ([HOU05](#)) at Table 90. Housing pressures are a consistent feature across the Oxfordshire housing market area. Whilst the exceptional circumstances that justify release of Green Belt in one place does not necessary mean that they apply elsewhere, it is relevant to note that Green Belt releases have been made by other plans in Oxfordshire,

table 1 shows where these allocations have led to removal of land from the Green Belt.

Table 1: Allocated sites leading to removal of Green Belt in Oxfordshire

Oxfordshire District	Allocated or proposed allocated sites on Green Belt
Cherwell Local Plan 2011 – 2031 (Part 1 Adopted 2015)	<p>Policy Kidlington 1 Accommodating High Value Employment Needs:</p> <ul style="list-style-type: none"> • Langford Lane / Oxford Technology Park / London –Oxford Airport; • Begbroke Science Park.
Partial review of Cherwell Local Plan 2011-2031 Oxford Unmet Housing Need	<p>Policy PR3 The Oxford Green Belt:</p> <ul style="list-style-type: none"> • Policy PR6a (32.1 hectares) • Policy PR6b (31.6 hectares) • Policy PR7a (10.8 hectares) • Policy PR7b (4.3 hectares) • Policy PR8 (111.8 hectares) • Policy PR9 (17.7 hectares) • 0.7 hectares of land adjoining and to the west of the railway (to the east of the strategic development site allocated under Policy PR8) • 11.8 hectares of land south of the A34 and west of the railway line (to the west of the strategic development site allocated) • 9.9 hectares of land comprising the existing Oxford Parkway Railway Station and the Water Eaton Park and Ride • 14.7 hectares of land to north, east and west of Begbroke Science Park • Safeguarded Land removed from the Green Belt (7.8 hectares) east of the A44 and north-west of the railway line (to the south of the strategic development site allocated under policy PR8)

Oxford City Local Plan 2016-2036	<ul style="list-style-type: none"> • Marston Paddock (0.78 Hectares) • Policy SP24 St Frideswide Farm (3.95 Hectares) • Policy SP25 Hill View Farm (3.52 Hectares) • Policy SP26 Land West of Mill lane (1.99 Hectares) • Policy SP27 Park Farm (1.56 Hectares) • Policy SP28 Pear Tree Farm (2.01 Hectares) • Policy SP29 Land East of Redbridge Park and Ride (3.64 Hectares) • Policy SP30 St Catherine's College Land (0.61 Hectares)
Vale of White Horse Local Plan 2031 Part 1	<ul style="list-style-type: none"> • Strategic housing allocations - Abingdon • Strategic housing allocation - Kennington • Strategic housing allocation - Radley
Vale of White Horse Local Plan 2031 Part 2	<ul style="list-style-type: none"> • Core Policy 8a Thames and Oxford Fringe Sub Area. • Core Policy 8b Dalton Barracks strategic allocation • Core Policy 13a Oxford Green Belt

6. The various exceptional circumstances that have justified the removal of land from the Green Belt across Oxfordshire have included, amongst other justifications, reference to housing needs issues within the same housing market area. We also have compelling exceptional circumstances to release Green Belt land which go beyond housing need alone. This provides a compelling strategic context.
7. The second justification is the inability of neighbouring Oxford to meet its needs, in the context of the Duty to Co-operate, with the most sustainable outcome requiring the allocation of sites on the edge of Oxford that are currently located within the Green Belt.
8. Further to the Council's response to [IC1A](#) question 3 (pages 9-11), we propose an additional new exceptional circumstance at South Oxfordshire relating to the importance of planning for economic development and recovery, which has more impetus in light of the need to plan for recovery from Covid-19. The [NPPE](#) (paragraph 80) requires us to help create the conditions in which businesses can

invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities. The Plan has a strategy to focus development at Science Vale and foster links between employment and housing.

9. The Sustainability Appraisal (SA) ([CSD4.2](#)) that accompanies the site assessment process indicated that some of the Green Belt sites selected for allocation performed better than non-Green Belt alternatives in terms of sustainability. Although the Green Belt sites at Culham and Berinsfield do not have the benefit of being located adjacent to the urban area of Oxford, their sustainability effects are significantly positive in the SA.

Question 6b: Have the Council adequately addressed the points in paragraph 137 of the NPPF in respect of the use of brownfield land, development density and inter-authority discussion?

Council Response:

Brownfield Land

10. In accordance with paragraph 137 of the [NPPF](#), before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, we examined fully all other reasonable options for meeting the district's needs. This included looking to make as much use as possible of sustainable brownfield sites and underutilised land.
11. In this case, with the settlement protected by a Green Belt lying outside our district, the Council's first task was to ensure that the City Council was doing all it could to accommodate growth within the City. To the end we made representations to the Oxford City local plan emphasising the need to make efficient use of land within the City, including brownfield opportunities and wherever possible to maximise density on potentially available and deliverable sites. The Oxford City plan has concluded positively, with the [Inspector's report](#) (PSD33) at paragraph 104 stating:

“Despite this, only a proportion of the housing required to meet the city’s needs can be delivered within its boundaries on non-Green Belt sites. Neighbouring authorities can accommodate some of Oxford’s needs and an apportionment has been agreed, as discussed under Issue 2. They have sought to make the most of urban land and site allocations and, in the case of South Oxfordshire, the draft Local Plan has found it necessary to alter Green Belt boundaries in sustainable locations near Oxford. It is evident that all options have been looked into, and the three criteria set out in paragraph 137 of the NPPF have been met. All the circumstances point to the conclusion that exceptional circumstances exist at the strategic level to alter the defined Green Belt in suitable locations within the city’s boundaries to allow for the provision of homes to help meet the city’s housing needs.”

12. For our towns and larger villages, a number of Neighbourhood Development Plans have been made and more are progressing which make best use of brownfield and underutilised land within those plan boundaries. An example is the Joint Henley and Harpsden Neighbourhood Plan which prioritised redevelopment of brownfield sites and intensification of existing land, with 80% of the 450 homes being delivered on brownfield sites ([OCD10](#)) (paragraph 5.2).
13. In the Plan we have identified land to accommodate at least 10% of the housing requirement on sites no larger than 1 hectare. Many small sites will be brownfield or underutilised land.
14. None of the alternative sites that were rejected in the latter stages of the site assessment process are brownfield sites (see section 6 of the [Site Selection Background Paper Part 2 \(TOP06.1\)](#) and appendix 6 of the same document for the detailed appraisal). Three of the eight strategic allocations in the Plan are on predominantly brownfield land: Culham Science Centre, Chalgrove Airfield and Wheatley.

Density

15. We have examined fully all other reasonable options for meeting needs, in accordance with paragraph 137 of the [NPPF](#), before concluding that exceptional circumstances exist to justify release of Green Belt land. The strategy optimises the density of development in line with paragraph 11 of the [NPPF](#), including promoting a significant uplift in density standards in town and city centres and other locations well served by public transport (STRAT5).
16. Policy STRAT 5: Residential Densities introduces a step change to our density policy in the District, currently at 25 dwellings per hectare (minimum) in Core Strategy Policy H2 ([ALP02](#)). The new approach increases density on sites in the District around Oxford, which aligns with Oxford City's own density requirements. At Didcot Garden Town the new higher density capitalises on locations in and around the District that can rely upon sustainable transport modes. A significant density uplift is planned for these locations. Elsewhere in the market towns and villages, we propose to raise densities from a minimum 25 dph and seek more ambitious levels, with safeguards for circumstances where this would not be appropriate. This is important to ensure that we minimise the amount of land required to be removed from the Green Belt.

Inter-authority discussion

17. Owing to the administrative geography and the location of the Oxford Green Belt, South Oxfordshire is in the position of receiving unmet need from its more constrained neighbour Oxford City, rather than being in a position to pass on our need. It is important to note that other Oxfordshire authorities have also needed to amend their Oxford Green Belt boundaries. The neighbouring authorities of Oxford, Vale of White Horse and Cherwell are in a shared housing market area and they have been significantly constrained in terms of Green Belt and other designations and they also have their own significant development needs. The settlement which the Green Belt encloses (Oxford) has taken an urban capacity approach, involving utilising brownfield land and higher densities, as explored through the Oxford Local Plan examination. The Council worked for several years on scrutinising Oxford's capacity, including commissioning consultants Cundall to conduct a thorough exploration of the city's sites and capacity (see report

Unlocking Oxford's Development Potential [HOU08](#)) , as explained in the Growth Board's Post-SHMA Review of Oxford's Capacity ([DUC08](#)).

18. The Council has worked with the other Oxfordshire authorities to identify a strategy to deliver the unmet housing need arising from Oxford City, set out in the Statement of Common Ground with the Oxfordshire Authorities ([SCG01](#)) at paragraphs 3.6 – 3.8. The duty to deliver part of this need has had a significant impact on, not only the Council's spatial strategy, but also the choice of sites allocated for development, so that unmet needs are addressed near to where that need arises in accordance with the [NPPF](#) (paragraph 11a).

Question 6c: Does the plan adequately allow for compensatory improvements for the loss of Green Belt in line with NPPF paragraph 138?

Council Response:

18. Yes, the Plan adequately allows for compensatory improvements in line with NPPF paragraph 138. This states:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

19. The strategic allocation policies relating to land which is currently Green Belt include specific on-site policy requirements which are necessary compensatory measures. These include appropriate landscaping and defensible landscaped edges at every site, to reduce impacts on the openness of the Green Belt and to ensure the permanence of the new Green Belt boundaries beyond the plan period. These site-specific proposals were principally informed by recommendations in the following reports:

- Landscape Character Assessment October 2018 ([NAT04](#))
- Strategic Allocation Landscape Sensitivity Report January 2018 ([NAT05](#))
- Green Belt Study September 2016 ([NAT07](#))
- Green Belt Assessment of Strategic Sites (NAT09)

20. With regard to off-site compensatory measures, the National Planning Practice Guidance ([NPPG](#)) on [Green Belt](#) at paragraph 002 Reference ID: 64-002-20190722 sets out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. We have had regard to this guidance in preparing table 2 below, which sets out the relevant measures: that are already contained within the Plan (and are viable); where that compensatory improvement has been evidenced; and which Green Belt compensation category it belongs to.

Table 2: Local Plan policies, compensatory improvements and related evidence and green belt compensation category

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
STRAT8 Culham Science Centre	Proposals for the redevelopment and intensification of the Culham Science Centre will be supported where this does not have an unacceptable visual impact, particularly on the openness of the surrounding Green Belt and the Registered Parkland associated with Nuneham House. <i>(Partly related to off site locations)</i>	Nuneham Courtenay landscape sensitivity mitigation – Strategic Allocation Landscape Sensitivity Report (NAT05) recommendation (pages 18, 58. 65-66), site viable.	New or enhanced Green Infrastructure
STRAT9: Land adjacent to Culham	2(vii)b. provide for excellent public transport facilities including, but not limited to, new and improvements to existing cycle and footpaths including	Cycle route between Didcot and Culham – OCC requirement, South and Vale Green Infrastructure Strategy (NAT01.4) (page	New or enhanced walking and cycle routes through the Green Belt

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
Science Centre	contributions for a 'Cycle Premium Route' is proposed between Didcot and Culham; provision of a new cycle bridge and associated connectivity and paths across the River Thames to connect appropriately with Abingdon on Thames to the north of the site; bus improvements including provision of a scheduled bus service, with a minimum of two buses per hour between Berinsfield, Culham and Abingdon, with options to extend or vary services to Chalgrove and Didcot;	80) included in IDP (CUL28 and HIF scheme), site viable. New cycle bridge to connect to Abingdon across the River Thames – OCC requirement, included in IDP (CUL23), site viable.	
	4iii appropriate landscaping and an integrated network of green infrastructure throughout the site and in particular along the boundaries of the strategic allocation, which would allow limited through views, creating a permanent defensible edge to protect the Oxford Green Belt. This shall be based on a landscape character, including historic landscape characterisation, that preserves and enhances the surrounding Green Belt Way and River Thames long distance footpaths; <i>(Partly related to off-site/boundary edge locations)</i>	Network of green infrastructure throughout the site – Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 67-73), included in IDP open space infrastructure type (CUL08-CUL10), site viable. Strategic allocation boundary landscaping – Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 11-12, 67-73, 77-79), included in IDP open space infrastructure type	Improvements to biodiversity, habitat connectivity and natural capital Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal). New or enhanced walking and cycle routes; and

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
		(CUL08-CUL10), site viable.	
	4v) a layout that has remains undeveloped to the northern border of the site and that should be utilised for flood plain storage, protecting the physical boundary features on the site; <i>(Partly related to off site locations)</i>	Strategic Flood Risk Assessment September 2017 (WWF06.4) (pages 13, 52), (WWD06.8) (pages 69-70).	New or enhanced Green Infrastructure.
	4vii) a layout and appropriate mitigation measures that protect Culham Brake Site of Special Scientific Interest (SSSI) which is adjacent to the north-west corner of the site, the Biodiversity Action Plan (BAP) priority sites to the north of Culham, and that within the Culham Science Centre and numerous BAP priority habitats, including the BAP priority habitat south of Culham Railway station.	South and Vale Green Infrastructure Strategy (NAT01.4) (page 93).	Improvements to biodiversity , habitat connectivity and natural capital.
STRAT10: Land at Berinsfield	2(vii) provide an integrated network of green infrastructure that links locally important wildlife sites and the enhancement of ecologically important habitats including areas of woodland and open space provision as set out in the Infrastructure Delivery Plan;	South and Vale Green Infrastructure Strategy (NAT01.4) (pages 63, 114), Green Belt Study (NAT07) (page 66), Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 18, 34-40).	New or enhanced green infrastructure. Woodland planting. Improvements to biodiversity, habitat connectivity and natural capital.
	3(i) appropriate landscaping throughout the site, including a new permanent defensible	Strategic Allocation Landscape Sensitivity	Woodland planting.

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
	landscaped edge to protect the Oxford Green Belt, while still maintaining a sense of permanent openness between Berinsfield and Drayton St Leonard, and maintaining key views to the Chiltern Hills and Wittenham Clumps. <i>(Partly related to off site locations)</i>	Report (NAT05) (pages 18, 34-40).	
STRAT11: Land South of Grenoble Road	2(ix)a. cycling and walking infrastructure network on and off site ensuring the site is well connected to Oxford City and appropriate surrounding villages; <i>(Partly related to off site locations)</i>	OCC requirement, included in the IDP (as GRE24), site viable.	New or enhanced walking and cycle routes.
	3(ii) a landscaped urban edge can be created to the south of the site to provide a transition into the wider landscape through woodland planting. The landscape planting should create a strong and defensible edge to Oxford, and create a permanent sense of openness between the site and Nuneham Courtenay, Marsh Baldon, Toot Baldon and Garsington. <i>(Partly related to off site locations)</i>	Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 118-125), included in the IDP as open space infrastructure types (GRE07-GRE09).	Woodland planting.
STRAT12: Land at Northfield	2(vi)(a) provision and contribution towards cycling and walking infrastructure network on and off site ensuring the site is well	OCC requirement, included in the IDP (as NOF24), site viable.	New or enhanced walking and cycle routes.

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
	connected to Oxford City and appropriate surrounding villages; <i>(Partly related to off site locations)</i>		
	3(ii) appropriate landscape mitigation measures to minimise the visual impact of the development on the openness of the Green Belt and maintain important views of Oxford City, providing a defensible Green Belt boundary and a strong countryside edge retaining a permanent separation between Oxford and Garsington. <i>(Partly related to off site locations)</i>	Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 133-140), Landscape capacity assessment (NAT04) (pages 56-57), included in the IDP as open space infrastructure types (NOF07-NOF09), site viable.	Woodland planting. New or enhanced Green Infrastructure.
STRAT13: Land north of Bayswater Brook	3(iv) provides a permanent defensible Green Belt boundary around the allocation and a strong countryside edge; <i>(Partly related to off site locations)</i>	Green Belt Assessment of Strategic Sites (NAT09) (pages 28, 31, 72), Landscape Capacity Assessment (NAT04) (pages 24), Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 96-110).	Woodland planting.
	3(v) retains and incorporates existing hedgerows and tree belts, particularly where this assists with the creation of a new Green Belt boundary; <i>(Partly related to off site locations)</i>	Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 96-110).	Woodland planting.

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
	<p>3(ix) provides a network of green infrastructure that:</p> <ul style="list-style-type: none"> a. retains and incorporates areas of functional flood plain and existing surface water flow paths; b. protects and enhances existing habitats, particularly those associated with Sidlings Copse and College Pond SSSI and the Bayswater Brook; c. connects with adjoining green infrastructure within Oxford City; d. retains and incorporates existing public rights of way and supports movement through the site and into adjoining areas by walking and cycling; and e. provides an appropriate buffer to the Oxford viewcone. <p><i>(Partly related to off site locations)</i></p>	<p>Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 96-110), Landscape Capacity Assessment (NAT04), Ecological Assessment of Sydtings Copse and College Pond SSSI (NAT14) (pages 13-14, 16).</p>	<p>New or enhanced Green Infrastructure.</p> <p>Woodland planting.</p>
<p>Policy STRAT14: Land at Wheatley Campus, Oxford Brookes University</p>	<p>2(iv) a. cycling and walking links to the centres of Holton and Wheatley and to the primary school;</p> <p>b. cycle link improvements to Oxford City, to ensure the route is a safe and attractive travel option;</p> <p>c. pedestrian and vehicular access to the east, with at least emergency, pedestrian, cycle and bus access to the west;</p>	<p>OCC requirement, included in the IDP (as WHE12/13), site viable.</p>	<p>New or enhanced walking and cycle routes.</p>

Local Plan strategic allocation Policy	Policy Criterion	Evidence Base	Green Belt Compensation Category in NPPG
	2(vi) appropriate landscaping, including buffers along the A40 and an appropriate countryside edge. <i>(Partly related to off site locations)</i>	Green Belt Assessment of Strategic Sites (NAT09) (page 44), Green Belt Study (NAT07) (page 69), Strategic Allocation Landscape Sensitivity Report (NAT05) (pages 142-149), South and Vale Infrastructure Strategy (NAT01.4) (page 171).	New or enhanced Green Infrastructure.

21. Other policies in the Plan also support the delivery of such compensatory improvements on remaining Green Belt. Such enhancements can be secured by developer contributions. The Council operates the CIL regime and has a ringfenced spending stream for green infrastructure / biodiversity provision of 5% of available CIL spend ([SODC CIL Spending Strategy](#), Nov 2018). These other relevant plan policies include:

- Policy ENV1 - by permitting development that protects and where possible enhances features that contribute to the nature and quality of valued landscapes;
- Policy ENV2 - by seeking mitigation or compensation for adverse effects of development;
- Policy ENV3 - by seeking biodiversity net gain;
- Policy ENV4 - by protecting and where possible enhancing the function and setting of watercourses and its biodiversity;
- Policy ENV5 - by requiring provision of new Green Infrastructure which includes the wider network if necessary;
- Policy DES1 - by requiring a constraints and opportunities plan and design rationale with important landscape features within and adjacent to the site retained;

- Policy DES4 - by requiring a site masterplan. This should clearly set out the movement and access arrangements and green infrastructure provision and illustrate how it integrates with the natural environment;
- Policy TRANS2 and TRANS5 - by supporting cycling and walking networks.

Question 6d: Do the presence of Green Belt and other environmental constraints indicate a need for a reduced housing requirement?

Council Response:

22. No, it would not be appropriate to reduce the housing requirement on account of the presence of the Green Belt and the District's other environmental constraints.
23. As set out above, the Council has agreed to meet some of Oxford's unmet need and it plainly makes sense to meet those needs on sites in sustainable locations close to the City. This justifies the release of the Green Belt in those locations. With regard to the District's own needs, as set out above in relation to question 6a, the plan seeks to deliver sustainable growth, the need for which fully justifies the release of the Green Belt sites at Berinsfield and Culham. With regard to 'other environmental constraints' the Plan appropriately balances the need for growth in more sensitive areas with the need to ensure the protection of the environment, see, for example, the approach taken in respect of the District's Towns. In setting housing targets to be delivered through Neighbourhood Development Plans, the Plan recognises that environmental constraints such as flood risk or the presence of AONB constraints may mean that targets are not fully achievable and this reflects guidance in paragraph 172 of the [NPPE](#).
24. The [NPPE](#), at paragraph 11b, requires there to be a "strong reason" for the basis of a green belt policy to restrict development. Nobody has demonstrated such strong reasons exist in South Oxfordshire.

25. We have appropriately balanced the constraints in the district with the need for development. No strategic sites are within the AONB. No sites involve built development on the floodplain. The sites to be removed from the Green Belt have been carefully assessed, with compensatory Green Belt improvements identified. There is no case for reducing the housing requirement on this basis. To do so would fail to address housing needs, including for affordable housing, fail to plan for economic development and recovery, and also affect our ability to assist Oxford City under the Duty to Co-operate. It follows that the presence of the Green Belt and other constraints does not justify a reduction in the Plan's housing requirement.
26. The Council considers the approach to Green Belt and the Plan's Green Belt Policy STRAT6 to be sound. In relation to strategic allocations, where a Green Belt boundary has been proposed to be altered, the Inspector in [IC6](#) has asked for a draft wording alteration to require compensatory improvements. This will be applied to each relevant strategic policy (i.e. STRAT8, STRAT9, STRAT10, STRAT11, STRAT12, STRAT13 and STRAT14). For Policy STRAT6 and the supporting text under paragraph 4.59 of the Plan, we propose the following modifications (new text is shown in **bold underline** and text that has been removed is shown in ~~strikethrough~~):

Policy STRAT6: Green Belt

2. The Green Belt boundary has been altered to accommodate strategic allocations at STRAT8, STRAT9, STRAT10, STRAT11, STRAT12, STRAT13 and STRAT14, **where the development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities.** The boundaries of the reviewed Green Belt are identified on the proposed changes to the Green Belt boundary maps (see Appendix 4)."

“4.59 The plan proposes alterations to the Green Belt to accommodate our strategic allocations at Culham, Berinsfield, Grenoble Road, Northfield and Land north of Bayswater brook, Wheatley. These proposals are included at Appendix 4. The individual sections within the plan which are relevant to each of these strategic allocations, provide specific detail on the approach for its release. The Policy requires compensatory measures to be delivered to remediate for the removal of land from the Green Belt. This is required by the National Planning Policy Framework at paragraph 138. Each relevant strategic allocation policy where Green Belt has been altered sets out requirements for the site and some of these measures could be considered as compensatory measures. Evidence on landscape, biodiversity or recreational needs with site specific recommendations and opportunities will also provide recommendations for enhancements that would deliver compensatory improvements on remaining Green Belt. The compensatory gain would be expected to be demonstrated through the individual site masterplans and secured through developer contributions if these enhancements are outside of the red line boundary of a planning application.”

Appendix 1: Key References

Key National Policies and Guidance	<ul style="list-style-type: none"> • Paragraph 11* including footnote 6 • Paragraph 80 • Paragraph 137 • Paragraph 138 • Paragraph 170 • Paragraph 172
Other Relevant Policies in the South Oxfordshire Local Plan	<ul style="list-style-type: none"> • STRAT1: Spatial Strategy • STRAT4: Strategic Development • STRAT6: Green Belt • STRAT8-STRAT14 • ENV1-12 • EP1-5 • DES8 Efficient use of Resources
Key Evidence Base Studies	<ul style="list-style-type: none"> • PSD07 Green Belt Topic Paper April 2020 • NAT07 Green Belt Study • NAT09 Green Belt Assessment of Strategic Sites in South Oxfordshire • TOP01 Housing Topic Paper • DUC01 Memorandum of Cooperation between the local authorities in the Oxfordshire Housing Market Area, Meeting the Objectively Assessed Need • HOU08 Unlocking Oxford's Development Potential • NAT01 South and Vale Green Infrastructure Strategy - Part 1 (Preferred Options) • NAT01.1 South and Vale Green Infrastructure Strategy - Part 2 (Preferred Options) • NAT01.2 South and Vale Green Infrastructure Strategy - Part 3 (Preferred Options) • NAT01.3 Note on draft Green Infrastructure Strategy (Preferred Options)

	<ul style="list-style-type: none"> • NAT01.4 South and Vale Green Infrastructure Strategy • NAT01.4A South and Vale Green Infrastructure Strategy • NAT04 Landscape Capacity Assessment • NAT05 Strategic Allocation Landscape Sensitivity Final Report • NAT05.1 Strategic Allocation Landscape Sensitivity Final Report - Appendices • NAT06 Landscape Character Assessment • NAT14 Ecological Assessment of Sydlings Copse and College Pond SSSI
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