APPLICATION NO.	P07/W0667/RET
APPLICATION TYPE	Full Planning Permission
REGISTERED	4 June 2007
PARISH	Stanton St John
WARD MEMBER(S)	Ms Anne Purse
APPLICANT	Mr Finn Limited
SITE	Rectory Farm Shop, Rectory Farm, Stanton St John
PROPOSAL	Change of use of part farm shop to butchers shop. Retrospective.
AMENDMENTS	None
GRID REFERENCE	457330/209579
OFFICER	Rob Cramp

1.0 INTRODUCTION

- 1.1 This application has been submitted following an enforcement investigation into the use of part of an existing farm shop building for the purpose of a butchers shop. Retrospective planning permission was granted on 30th August 2006 for the erection of the new farm shop building for the sale of fruit and vegetables in connection with the pick your own activities on Rectory Farm Stanton St. John (P05/W0391/RET). The current application now seeks retrospective planning permission for a change of use of part of the above building to a butchers shop (Class A1). This follows the refusal of an earlier application (P06/W0946/RET) for the same use on the 18 October 2006.
- 1.2 The application is referred to Planning Committee at the request of Councillor Andrew Hodgson.

2.0 PROPOSAL

- 2.1 The application site lies outside of the western outskirts of the village of Stanton St John and forms part of Rectory Farm which is located within the Oxford Green Belt. The site is accessed from Pound Lane which runs off the B4027. The land which is the subject of this application is separated from the main agricultural buildings and farm yard of Rectory Farm which lies on the opposite side of Pound Lane to the east. The OS plan extract attached at <u>Appendix 1</u> shows the site location.
- 2.2 Rectory Farm occupies some 429ha of land within the local area. It is an arable farm, producing a number of crops which are suitable for a pick your own type farming operation. The use occupies an existing building which is approximately 12m by 18m (216 square metres) with a height at the ridge of 4.5m.
- 2.3 The application seeks retrospective planning permission for the use of approximately 73.5 square metres of the existing farm shop building, representing approximately one third of the internal floor space, for the purpose of a butchers shop. The remaining floor space is presently given over to the sale of fresh

produce as approved by planning permission P05/W0391/RET subject to conditions. A refrigerated trailer which serves as the cold room for the butchers shop is situated outside the building and adjacent to its north west corner.

- 2.4 The pick your own growing season is open from early April to the end of October with formal opening hours of 9.30am to 7:00pm. The butchers shop, however, is proposed to remain open from April through to December with business hours from 9:00am to 5pm Tuesday to Saturday. (Note:- the applicant would also ideally wish to open on Sundays during the summer months (June, July and August).
- 2.5 The applicant is of the view that the proposed use does not represent a threat to the viability of the village shop in nearby Stanton St. John and proposes a condition restricting the use to the sale of poultry, beef, pork and lamb meats and products (e.g. cured hams, salamis and porks) and processed products to include pies and sausages and burgers (which are made on the premises) and eggs. The applicant further proposes a condition preventing the sale of tinned products, prepackaged groceries, frozen products, sauces, milk, butter, margarine, yogurt, cheddar or feta cheese, drinks, bread or bakery goods. The applicant is of the view that by thus restricting the sale of goods the proposed development will not conflict with product lines sold by the village shop and will not therefore adversely impact on its viability.
- 2.6 The applicant claims to sell at least 80% locally derived produce (i.e. goods produced within 30 miles of Rectory Farm). This claim has not been verified by the applicant in quantitive terms and is not a readily enforceable requirement. It should be noted, however, that none of the goods sold in connection with the proposed butchers shop are actually produced on Rectory Farm.
- 2.7 The use employs an average of 4 persons including 3 full time staff and up to 6 part time staff depending on the season. A car parking area capable of accommodating up to 60 cars is available for use in connection with the farm shop and the pick your own activities of the farm.

3.0 CONSULTATIONS & REPRESENTATIONS

- 3.1 Stanton St.John Parish Council No strong views. The Parish Council views positively the principle of a butchers shop in the village providing it is not a threat to the existing village shop/post office. Any approval should be subject to the following conditions:
 - 1. Goods limited to fresh meat, traditional game and meat products only;
 - 2. Provision be made for adequate car parking facilities, and consideration be given to the impact of additional traffic at the busy crossroads (Pound Lane/B4027); and

	 Measures to ensure adequate security must be sensitive to the rural location of the shop and surrounding countryside.
3.2 Highway Authority	The site is situated in an unsustainable location.
	The proposed butchers shop is not an agricultural use, but an A1 land use. Concern is raised at the impact of such a use on the local highway network, as any intensification of the site would contravene national and local policies on sustainability.
3.3 Environmental Health Unit	The sequential approach to development would aim to site an A1 land use in a town centre location to reduce the need to travel to/from the premises by car. It is acknowledged that there are likely to be some linked trips made by customers using the farm shop. It also provides opportunities for local customers who would otherwise travel further a field to purchase their meat. The Highway Authority would recommend against an A1 use in this location, however, the Highway Authority does not propose to object to the proposal subject to the conditions proposed in the applicant's submission. In order for the building to be used as a butchery it would need to meet the standards of current food hygiene legislation which would mean that drainage facilities are to be adequate for the purpose intended. As there is a wash hand basin and kitchen
	sinks in the butchery there must be adequate foul water drainage.
	A notice pursuant to section 59(1) of the Building Act 1984 has already been served on the applicant to require the execution of drainage works.
	The application should be refused as inadequate drainage is available to the site.
3.4 Village shop proprietors	The village store and post office has been established here for over 30 years and provides this service to nearby villages

We were surprised that the application seeks the sale of "food stuffs" other than butchers meat. We have no objection to sale of fresh meat alone, however, object to sale of other sidelines, i.e. dairy products (milk, cheese, yoghurts) bread, cakes, rolls, biscuits, cool drinks etc.

3.5 3 x letters of objection from residents of Stanton St.John Object to the application for the following reasons:

- threatens the viability of the village shop and post office;
- not compliant with health regulations;
- impact on the character of the village and the Green Belt location;
- concern that Rectory Farm will continue to grow if such activities are left unchecked;
- scale of development (4-6 employees) suggests industrial scale food processing not just local butchers shop;
- restriction on the sale of products cannot be relied upon; and
- external refrigeration units, hardstandings and fenced areas inappropriate in rural setting.

3.6 25 x letters from Support the application for the following reason customers in support

- good service;
- quality product;
- meat sourced from local producers;
- local source of employment;
- meat from independent butcher a better quality alternative to supermarkets;
- nice day out for the family;
- attracts more people to Rectory Farm; and
- allows shared trips to the Rectory Farm Shop.

[Note:- Of the above submitters only two identified themselves as residents of Stanton St John. Of these two, one is the owner of Rectory Farm; the other is supportive of the butchers shop provided that it can coexist with the village shop which he regards as more important to the village]

4.0 RELEVANT PLANNING HISTORY

- 4.1 In March 2005 a planning application (P05/W0391) was submitted for the erection of a replacement pick your own farm shop building to replace a building damaged by fire.
- 4.2 In September 2005 an enforcement investigation was commenced when it was discovered that the building had already been erected without the benefit of planning permission (WE05/144).

- 4.3 On 30 August 2006 retrospective planning permission (P05/W0391/RET) for the erection of the replacement pick your own farm shop building was granted subject to conditions, including the following:
 - 1. That the building shall only be open for trading during the months of April to October inclusive, each year.
 - 2. That if the use of the building shall cease permanently within 10 years or is no longer required for an agricultural purpose then the building shall be removed from the land and the land reinstated to its former condition.
 - 3. That the building shall only be used for an agricultural and horticultural use and for the sale of fresh fruit and vegetables and for no other purpose within Class A1.
 - 4. No more than 20% of the produce sold from the building (as assessed by the annual turnover of produce sold there from) shall be produced from anywhere other than Rectory Farm.
 - 5. That retail sales shall only take place from within the building hereby approved.
- 4.4 During the course of assessing the planning application for the farm shop building it became apparent that the building was being used in a manner contrary to that for which planning permission was sought, in that part of the building was being used for the purpose of a butchers shop. A planning enforcement investigation (WE06/275) was subsequently commenced into the above breach.
- 4.5 On 23 August 2006 a planning application (P06/W0946/RET) was registered with the Council for the change of use of part of the farm shop to a butchers shop. This application was refused by the Council on 18 October 2006 for the following reasons:
 - 1. That the proposed use would have a significant adverse impact on the vitality and viability of the existing village shop in Stanton St. John and other town centre uses contrary to policies A4 and TC7 of SOLP 2011.
 - 2. That the proposed use including signage, traffic and parking activities represents an intrusive form of commercial development in an isolated rural

location which is contrary to principles of sustainability and policy G1 of the Oxfordshire Structure Plan 2016 and policies G3, TC7 and A4 of SOLP 2011.

- 3. That the proposed use including signage, traffic and parking activities including year round trading represents an intensification of the use of the site and an intrusive form of commercial development in a Green Belt location, which is contrary to the openness of the Green Belt and the purpose of including land in the Green Belt contrary to policy GB3 of SOLP 2011.
- 4. Inadequate provision has been made for the foul water drainage of the site contrary to policy D11 of SOLP 2011.

[Note: - The above refusal is currently the subject of a planning appeal yet to be heard]

5.0 POLICY & GUIDANCE

5.1 The following Government policy documents are relevant:

PPG2 – Green Belts

- PPG18 Enforcing Planning Control
- PPS1 Delivering Sustainable Development
- PPS6 Planning for Town Centres
- PPS7 Sustainable Development in Rural Areas

Development Oxfordshire Structure Plan 2016 Policies G1,G2, G4, G5, T1, EN1 & E4

South Oxfordshire Local Plan 2011 Policies G2, G3, G4, GB3, D2, D11, E5, A4, TC7 & T2.

6.0 **PLANNING CONSIDERATIONS**

- 6.1 The main issues to be considered in connection with the current proposal are:
 - 1. commercial impacts of development;

- 2. sustainability;
- 3. impact on the Oxford Green Belt;
- 4. impact on the countryside; and
- 5. adequacy of foul water drainage infrastructure.

Commercial Impacts

- 6.2 Advice set out in PPS7 'Sustainable Development in Rural Areas' is supportive of farm diversification schemes for business purposes that contribute to sustainable objectives, help sustain the agricultural enterprise and are consistent in their scale with their rural location. In assessing such proposals, however, PPS7 indicates that regard should be given to the amenity of any nearby residents or other rural businesses that may be adversely affected by new types of on-farm development.
- 6.3 With specific reference to farm shops PPS6 'Planning for Town Centres' states that: "Care should however be taken to ensure that they do not adversely affect easily accessible convenience shopping available to the local community."
- 6.4 The thrust of this advice is carried forward in the Local Plan under policy A4 which relates to Farm Shops. Policy A4 permits farm shops provided that:
 - i. the scale of operations is small;
 - ii. it can be demonstrated that the shop is needed to sell goods produced on the farm unit and that the greater proportion of goods sold comprise local produce;
 - iii. existing buildings are used if at all possible;
 - iv. there would be no significant adverse impact on any nearby village shop; and
 - v. there are no overriding environmental, amenity or highway objectives.
- 6.5 Paragraph 6.45 under Policy A4 recognises the need for the Council to control the activities of farm shops including the amount of non-local produce sold, in order to ensure that the farm shops will not grow to a size where they would undermine the viability of other local shops, create a need for large buildings, display areas, car parks and advertisements inappropriate in a country location. In granting planning permission (P05/W0391/RET) for the erection of the existing farm shop building the Council sought to restrict the activities of the farm shop, in accordance with the above policy guidance, by the imposition of conditions as outlined in paragraph 4.3 above.
- 6.6 The introduction of the butcher's shop into the building, however, no longer satisfies the requirements of policy A4 and particularly criterion (ii) which requires firstly that *"it can be demonstrated that the shop is needed to sell goods produced on the farm unit"* and then secondly that *"the greater proportion of the goods sold comprise local produce."* In the circumstances of the present case none of the products sold by the butcher's shop are produced on the Rectory Farm unit, thereby failing the first test of criterion (ii). Simply stated it has not been demonstrated that the butcher's shop is required to sell goods produced on the farm. In fact during those months when the pick your own / farm shop is not operating, the building would be exclusively devoted to the sale of goods not produced on the farm. The subsequent test regarding the greater portion of the goods comprising local produce therefore becomes irrelevant.

- 6.7 The applicant's planning agent suggests that "the village shop has not suffered since the butcher's shop opened." Although the basis for this statement is not made clear, it is unlikely that such a conclusion could be drawn without reference to the financial records of the village shop and on the basis of the activities of a single trading year only (i.e. since the butcher shop commenced trading). In the circumstances of a case involving the viability of a long established village store and post office of some 30 years, the Council should opt for a precautionary approach when assessing the commercial impacts of development. This is particularly the case given the recent public outcry regarding the loss of post office facilities from many smaller communities. As the butchers shop has only operated from these premises for a single trading year the Council should also anticipate that it may still continue to grow into the future.
- 6.8 The inappropriate location of competing retail facilities in isolated out-of-centre locations can contribute to the loss of such amenities from rural villages. The applicant's apparent justification of the current use on the basis that the *"business serves...a local clientele based around a series of rural villages, some of which have lost their local amenities"* is therefore a somewhat perverse argument.
- 6.9 The applicant has suggested that the imposition of a condition to restrict the number of competing product lines sold by the butchers shop to minimise competition with the village shop. However, when combined with the sale of goods from the existing farm shop (fruit and vegetables), as well as refreshments offered by the café bar and other attractions on Rectory Farm (bouncy castles, etc) such a condition relating to the activities of the butchers shop alone may not be sufficient to safeguard the viability of the village shop. Situated outside the built up limits of the village the combined facilities offered by the Rectory Farm shop provide customers with an alternative shopping destination with sufficient range of alternative goods and attractions to draw custom away from the village store contrary to criterion (iv) of policy A4.
- 6.10 In addition to its function as a community post office, the village shop relies upon convenience sales of various food and grocery items. Even if the exact product lines offered by the farm shop at Rectory Farm do not directly conflict with those of the village shop, a local consumer wishing to purchase the makings of a meal is now faced with two alternative shopping destinations. Even the partial overlapping of basic grocery items such as eggs and cheeses, albeit of a different quality, within such close proximity to each other may be enough to undermine the vitality and long term viability of the village shop. The loss of the village shop would also mark the end of the community post office and an important shopping destination for those less mobile members of the local community.
- 6.11 PPS6 'Planning for Town Centres' indicates that: "Local authorities should seek...to protect existing facilities which provide for people' day-to-day needs. Market towns and villages should be the main service centres in rural areas, providing a range of facilities, shops and services at a scale appropriate to the needs and size of the catchment area"..."Local planning authorities should be aware of the extent of the rural population which is dependent on a particular centre or facility, such as a village shop, and seek to protect existing facilities"..."In planning for village shops and services, local planning authorities should adopt policies which ensure that the importance of shops and services to

the local community is taken into account in assessing proposals which would result in their loss."

- 6.12 Of the 25 persons who have written in support of the application only 2 have identified themselves as residents of Stanton St John. Of these two, one is the owner of Rectory Farm; the other is supportive of the butchers shop provided that it can coexist with the village shop which he regards as being more important to the village. All of those persons objecting to the proposed development are residents of Stanton St. John who are primarily concerned for the ongoing vitality and viability of the village shop and post office. The Parish Council have similarly indicated an in-principle support for a butchers shop in the village provided that it current position outside the built-up limits of the village and with the relative advantage of ample parking associate with the pick your own activities of the farm represents a real threat to the ongoing vitality and viability of the village shop contrary to both Local Plan policies and relevant Government Guidance.
- 6.13 The combination of the butchers shop with the existing farm shop activities also brings into question whether the development still satisfies criterion (i) of policy A4 which requires that the scale of farm shop operations remain small. In this regard the butchers shop alone involves the employment of up to 9 persons including 3 full time employees and up to 6 part time staff. The diversification of product types with the introduction of the butchers shop into the existing farm shop has a clear impact on the scale of the operation.
- 6.14 If left unchecked the combined facilities of the site are capable of expansion to the extent of offering a range of goods and services akin to a key town centre activity in an out of centre location, thereby threatening the vitality and viability of existing town centres contrary to policy TC7 of SOLP 2011 and Government Guidance. In this regard paragraph 2.1 of PPS6 indicates that: *"In order to deliver the Government's objective of promoting vital and viable town centres, development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them."* One submitter from Tiddington although acknowledging that "we are well served with butchers shops in Thame" bypasses these facilities to purchase meat at Rectory Farm.
- 6.15 It is of course commercially attractive and advantages to locate shops out of village or town centres where land or premises may be cheaper and it is likely that there would be more space available for the provision of customer parking. The cumulative effects of such facilities, however, may include an undermining of the vitality and viability of existing village and town centres.
- 6.16 The Development Plan otherwise encourages the location of such retail activities within settlements where they reinforce rather than detract from the overall role and attractiveness of the settlement as a focus of shopping activities. In this regard the policies of the Local Plan would be supportive of a suitable proposal for the location of the same business within the village limits in close proximity to the existing village shop.

Sustainability

6.17 Criterion (v) of Policy A4 seeks to resist proposals for Farm Shops where there is an overriding highway objection. Such facilities should be small scale only and

therefore unlikely to cause a problem of excessive traffic generation on country roads.

- 6.18 Policy G3 of SOLP 2011, in line with current Government Guidance, seeks to ensure that new development which gives rise to traffic generation, is located where there is less need to travel by car and where the use of public transport, walking and cycling can be encouraged.
- 6.19 In the circumstances of the present case the application site is situated in an isolated rural location inaccessible by public transport. It is also situated outside the built up limits of the village and does not therefore encourage access by walking or cycling.
- 6.20 Although the trading months for the butcher's shop have been reduced from the previously refused application, they still exceed those of the pick your own and farm shop activities which are tied to the seasonal cycles of the farm. The butchers shop therefore represents a travel destination in its own right and an intensification of the use of the site above that of a small scale farm shop alone. Various estimates of traffic generation in connection with the butchers shop include 50 daily customers or 300 weekly customers (not including deliveries by refrigerated lorries). This represents a significant generation of traffic in an isolated rural location to what is to all intents and purposes a working farm.
- 6.21 Although the use does offer some limited opportunity for linked journeys during periods when the pick your own / farm shop business is trading, it also encourages multiple journeys in the case of other weekly purchase items that are not available on the site. These other weekly grocery requirements are most likely to be obtained from larger village or town centres which otherwise offer linked journey opportunities. The policies of the Local Plan would otherwise be supportive of a suitable proposal for the location of the butcher's shop within the village limits in a manner that would reinforce the settlement as a focus of shopping activities in accordance with principles of sustainability.
- 6.22 Not surprisingly the application is supported by a large number of submissions from existing customers. Interestingly, however, most of these are not residents of nearby Stanton St John and many of them travel significant distances to get to Rectory Farm, including one customer from High Wycombe who travels 26 miles in both directions just to purchase meat. Other submitters travel from Aylesbury, Bicester, Marlow, Thame and Oxford City, bypassing numerous town and village centres in the process. Many of these customers indicate that the reason they travel such distances is due to the quality of the meat and the use of local produce. Neither of these criteria, however, would prevent the same butchers shop activity from locating in a village or town centre location in a manner consistent with the principles of sustainability.
- 6.23 The Local Highway Authority, although not objecting to the current proposal does recommend against the location such facilities in isolated locations contrary to development plan policies and Government Guidance.
- 6.24 In summary this site is situated in an out of centre rural location that is contrary to principles of sustainability and policies G3, G4, TC7 and A4 of SOLP 2011.

Impact on the Green Belt

6.25 This is a Green Belt location where there is a presumption against 'inappropriate

development'. PPG2 advises that inappropriate development, by definition, is harmful to the Green Belt and that in such circumstances it is for the applicant to show why planning permission should be granted. PPG2 also advises that very special circumstances, justifying inappropriate development, will only exist where the harm created by reason of inappropriateness (and any other harm) is clearly outweighed by other considerations. It falls upon the applicant to demonstrate that very special circumstances exist justifying any such departure.

- 6.26 PPG2 also provides that the making of any material change in use of land within the Green Belt constitutes inappropriate development in the Green Belt unless they maintain openness and do not conflict with the purpose of including the land in the Green Belt (see also policy GB3 of SOLP 2011). The purposes of including land in the Oxford Green Belt are specifically referred to in paragraph 3.47 of SOLP 2011, being to:
 - preserve the special character and landscape setting of Oxford
 - check the growth of Oxford and prevent ribbon development and urban sprawl
 - prevent to coalescence of settlements
 - assist in safeguarding the countryside from encroachment; and
 - assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 6.27 SOLP 2011 (para 3.45) emphasises that the special character and landscape setting of the City derives from a number of factors, including the general area of attractive countryside which surrounds Oxford and creates its wider setting. The scale of activity in the area is also an important determination of the Green Belt's character; any significant increase in the level of activity may result in increased pressure for development which will threaten the character and setting of the City.
- 6.28 In the circumstances of the present case the proposed use including signage, parking and traffic generation represents a significant intensification of activity on the site over and above that normally associate with the farm shop or a pick your own activity, which are otherwise seasonal in nature. This intensification of activity conflicts with the purposes of including land in the Green Belt in that it fails to preserve the character, openness and visual amenity of Green Belt. The proposed establishment of a shop in an out of centre location also fails to prevent urban sprawl or safeguard the countryside from the encroachment of town centre activities. Therefore the proposed change of use of the land constitutes inappropriate development in the Green Belt notwithstanding that the retail activity is confined to an existing building.
- 6.29 Very special circumstances have not been put forward justifying a departure from Green Belt policy.

Impact on the Countryside

- 6.30 The proposed use represents an intrusive form of commercial development in an isolated rural location contrary to Policy G4 of the SOLP 2011 which seeks to protect the countryside from the encroachment of new development.
- 6.31 Although the butchers shop occupies part of an existing building the commercial

activities associated with the use including traffic, parking and signage are incongruous with the rural setting, particularly during those months when the farm shop and pick your own activities of the farm are closed. In this regard local objectors express concern, among other things, about the impact that the proposed development is having on the character of the area.

6.32 From the point of view of the applicant it is no doubt commercially attractive and advantage to locate outside of village or town centres where land or premises may be cheaper and it is likely that there would be more space available for the provision of customer parking. The granting of planning permission in this and similar circumstances however would contribute to a progressive decline in the character of the countryside contrary to policy G4 of SOLP 2011.

Adequacy of Foul Water Drainage Infrastructure

- 6.33 Criterion (xi) of policy D11 of the SOLP 2011 provides that development will only be permitted if adequate foul water drainage infrastructure is available to provide for the kind of development proposed.
- 6.34 The Council's Environmental Health Unit has advised that in order for the building to be used as a butchery it would need to meet the standards of current food hygiene legislation, which would mean that foul water drainage facilities should be available. The current building, however, is not connected to foul water drainage. In this regard a notice pursuant to section 59(1) of the Building Act 1984 has already been served on the applicant to require the execution of drainage works.
- 6.35 The applicant is understandably reluctant to go to the expense of carrying out such works while the current application remains undetermined. It is also acknowledged that such a requirement could be made conditional to any grant of planning permission. The absence of foul water drainage infrastructure is therefore insufficient basis in its own right upon which to refuse planning permission.

7.0 CONCLUSION

- 7.1 The Council should support local businesses that provide and support local goods. In the circumstances of the current case, however, the Council should not lose sight of the fact that none of the goods sold by the butchers shop are actually grown at Rectory Farm. There is therefore no apparent need for the facility to be located outside of existing village or town centres in a manner that is contrary to principles of sustainability.
- 7.2 The proposed development in its proposed location is likely to have a significant impact on the vitality and viability of the existing village shop/post office in Stanton St. John contrary to policy A4 of SOLP 2011. It is further likely to contribute to an adverse impact on the vitality and viability of other village and town centres.
- 7.3 The proposed use including signage, traffic and parking activities represents an intensification of the use of the site and an intrusive form of commercial development in a Green Belt location, which is contrary to the openness of the Green Belt and the character of the rural countryside.

8.0 **RECOMMENDATION**

- 8.1 **REFUSAL OF PLANNING PERMISSION for the following reasons:**
 - 1. That the proposed use would have an adverse impact on the vitality and viability of the existing village shop in Stanton St. John and town centre locations contrary the aims and objectives of PPS6 and policies A4 and TC7 of SOLP 2011.
 - 2. That the proposed use including signage, traffic and parking activities represents an intrusive form of commercial development in an isolated rural location which is contrary to principles of sustainability and policies G3, G4, TC7 and A4 of SOLP 2011.
 - 3. That the proposed use including signage, traffic and parking activities represents an intensification of the use of the site and an intrusive form of commercial development in a Green Belt location, which is contrary to the openness of the Green Belt and the purpose of including land in the Green Belt contrary to policy GB3 of SOLP 2011.

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