# Written evidence from the Oxylane Group

# **Executive Summary**

- 1.1 These representations are submitted by the Oxylane Group in response to following questions:
  - Is the relationship between the NPPF and other national statements of planning-related policy sufficiently clear and does the NPPF serve to integrate national planning policy across Government Departments?
  - Are the policies contained in the NPPF sufficiently evidence based?
- The Oxylane Group is one of the World's leading sports development companies, and our Decathlon brand sports stores lead the market in the UK, providing a one-stop facility for technical and specialist sports equipment.
- 3. However, we recognise that stubbornly low levels of sports participation represents a major barrier to market growth, and are therefore investing heavily in driving significant and sustained growth in the numbers of people regularly playing sport and being physically active.
- 4. Our concept Oxylane Village (illustrated at Appendix 1) although new in the UK, is well established in France. Delivering grass roots, family-focused formal and informal sports and recreational facilities alongside access to equipment, advice and professional coaching, the concept builds on the Sport England model of sustainable sports hubs, which recognises that a multi-sport / activity environment is a proven catalyst for driving participation.
- 5. The Oxylane Group aim to build 30 Oxylane Villages and 160 new Decthlon stores across the UK over the next 10 years, delivering 20,000 jobs. This represents a total investment of £2.5bn, delivering sustainable community sports and recreation facilities, and contributing significantly towards economic growth and the development of sustainable communities.
- 6. The consolidation of national planning policy into a single National Planning Policy Framework represents a critical opportunity to address some of the inadequacies of the existing regime, and ensure consistency with more recent cross-governmental policy aimed at tackling the growing health problem of 'lifestyle diseases' and delivering a legacy from the London 2012 Olympic Games.

- 7. The key requirement is to ensure that the right environments are provided where participation in sport can increase, embracing the contribution of the private sector and ensuring that the delivery of new facilities is not constrained by an approach that only caters for current low levels of participation.
- 8. There is much within the draft NPPF that Oxylane supports. However, we strongly believe that the following changes will provide the necessary platform to drive significant and sustained growth in participation in sport and the numbers of people being physically active, which is essential to the success of wider Government policies for tackling the major public health problem of 'lifestyle diseases' and delivering an Olympic legacy:
  - Planning policies should support development that contributes towards improvements in health and well-being, including development that promotes physical activity or provides opportunities for people to participate in sport and active recreation
  - The NPPF should be consistent with the Government's health and Olympic legacy agendas, and recognise the *key* role that the planning system has in creating environments where activities are made easier and public health can be improved
  - The enormous beneficial effects of regular participation in sport and physical activity should be acknowledged in the NPPF, and much greater emphasis should be placed on the contribution that access to good quality open spaces and opportunities for sport and recreation makes to health and well-being
  - Locally assessed needs for open space, sports and recreational facilities should be used to establish the *minimum* level of provision required, not the maximum
  - Local planning authorities should be required to plan for the *delivery* of open space, sports and recreational facilities in a similar way to housing, which requires that local planning authorities assess the availability, suitability and viability of potential sites *before* allocation, in order to ensure that they are deliverable
  - Local planning authorities should be required to specifically provide for the varied locational requirements of different retail and leisure formats, including large scale sports facilities
  - Planning policies should support the delivery of retail and leisure proposals which cannot be accommodated in or adjacent to town centres
  - The delivery of new facilities and encouragement of competition within the sports market should be positively welcomed in order to maximise opportunities for participation

- Local planning authorities should be required to plan positively for sport, including allocating sufficient deliverable sites for appropriate facilities to meet identified needs
- The development of new open, space, sports and recreational facilities, over and above that required to meet identified needs, should be encouraged in order to deliver growth in levels of sports participation
- In the context of existing low levels of participation in sport and the numbers of people being physically active, the loss of existing open space, sports and recreational facilities should not be permitted on the basis that they are surplus to requirements. Instead, the NPPF should require the provision of commensurate new facilities on locationally preferable sites, where they will continue to meet identified needs
- The NPPF should recognise that the delivery of sustainable sports facilities requires that
  the long-term financial obligations on local authorities is minimised, and that commercial
  income streams from other 'enabling development' is likely to be necessary in order to
  provide long-term financial sustainability
- The extent to which development supports wider Government policy objectives, and is
  otherwise consistent with the policies in the NPPF, should be identified as a key
  consideration when determining whether there are 'very special circumstances' sufficient
  to justify 'inappropriate development' in the Green Belt.

# 1. Introduction

- 1.1 These representations are submitted by the Oxylane Group as evidence to the House of Commons Communities and Local Government Committee in response to following questions:
  - Is the relationship between the NPPF and other national statements of planning-related policy sufficiently clear and does the NPPF serve to integrate national planning policy across Government Departments?
  - Are the policies contained in the NPPF sufficiently evidence based?
- 1.2 In so doing, it is considered necessary to examine the detail of certain policies within the draft NPPF in order to illustrate the inconsistencies and contradictions with other national statements of planning-related policy.

- 1.3 The Oxylane Group is one of the World's leading sports development companies, operating in 17 countries and employing more than 50,000 people united in a common purpose to create desirability and make the pleasure and benefits of sport accessible to all.
- 1.4 Our Decathlon brand sports stores lead the sports retail market in the UK in terms of range, pricing and customer and staff initiatives, and provide a comprehensive one-stop facility for technical and specialist sports and active recreation equipment.
- 1.5 Unlike many of the other sports retailers, who have shifted their focus towards high street sports fashion, Oxylane remain committed to providing a comprehensive range of top quality technical sports equipment.
- 1.6 However, we recognise that stubbornly low levels of sports participation represents a major barrier to market growth, and are therefore investing heavily in order to drive significant and sustained growth in the the numbers of people regularly playing sport and being physically active.
- 1.7 We do this not only because it makes commercial sense, but also because Oxylane are passionate about sport, health and well-being.
- 1.8 Oxylane believe that by locating interesting, attractive and high quality products alongside excellent facilities, together with first class programming and mangement, we can drive up participation levels and contribute substantially to achieving wider cross-governmental policy objectives.
- Our concept Oxylane Village (illustrated at Appendix 1)– although new in the UK, is well established in France, where there are now 9 Villages welcoming more than 8 million visitors every year. Delivering grass-roots, family-focused formal and informal sports and recreation facilities alongside access to equipment, advice and professional coaching, Oxylane Village creates a unique environment which is attractive to all sections of the community, including those who are usually deterred from taking part in physical activity.
- 1.10 The concept builds on the Sport England model of sustainable sports hubs, which recognises that a multi-sport / activity environment is a proven catalyst for driving participation, creating the desire to participate and, crucially, delivering immediate opportunities to act upon that desire. The result is sustainable growth in sports participation, and more people being physically active, which leads to better health outcomes and the creation of a larger sports community to the benefit of all.

- 1.11 The Oxylane Group aim to build 30 Oxylane Villages and 160 new Decathlon stores across the UK over the next 10 years, delivering 20,000 jobs. This represents a total investment of £2.5bn, delivering sustainable community sports and recreation facilities, and contributing significantly towards economic growth and the development of sustainable communities.
- 1.12 The consolidation of national planning policy into a single new National Planning Policy Framework (NPPF) represents a critical opportunity to address some of the inadequacies of the existing regime, and ensure consistency with more recent cross-governmental policy aimed at tackling the growing public health problem of 'lifestyle diseases'.
- 1.13 The planning system has a key role in creating an environment where activities are made easier and public health can be improved. However, static levels of participation and the rise in obesity and overweight in society, is proof that a new, more aspirational, approach is needed if we are to support people in making healthy choices, and therefore live healthy and fulfilling lives into old age.
- 1.14 The key requirement is to ensure that the right environments are provided where participation is sport can increase. This means providing the right facilities in the right place at the right time, but also establishing the financial vehicles to ensure the delivery of sustainable facilities within a climate of economic austerity. It is critical that the contribution of the private sector is embraced, and that the delivery of potential new facilities is not constrained by an approach that only caters for current low levels of participation.

# 2. Policy Background

- 2.1 Physical inactivity has become a major public health problem, with the majority of people not being sufficiently active to enjoy the full range of health benefits, and as few as 30% of children getting the recommended amount of exercise. Britain is now the most obese nation in Europe, and inactivity and sedentary behaviours place a significant, and growing, burden on healthcare services and the wider economy.
- 2.2 Sports participation rates have remained stubbornly static in the last 30 years or so, and substantially lower than in other north western European countries, despite compelling scientific evidence regarding the benefical effects of physical activity on health and well-being. There is also now a growing body of evidence on the positive impact that regular participation in sport can have on developing strong, sustainable and cohesive communities.

- 2.3 As a consequence, a wealth of cross-governmental policy has been published in recent years, promoting greater participation in sport and physical activity, both as a driver for improvements in health and well-being, and a key component of the London 2012 Olympic legacy.
- 2.4 At the same time, recent studies have recognised that public expenditure on sport in the UK is limited and, despite best endeavours and investment from central and local government, participation levels remain flat.
- 2.5 Part of the problem is creating the right environment to drive participation, as identified in the recent Inverdale Report (2011), which found that facilities for sport and recreation in the UK are not in good enough condition and, in some cases, are not even available for use.
- 2.6 However, with the ability of the public sector to fund community sports facilities also declining, there is a clear need for private sector investment, as recognised in the 4Ps review of leisure PFI and PPP (2007), and innovation in the forms that new sports facilities are provided.

## Health and Well-being

- 2.7 The Chief Medical Officer's report, *At Least Five A Week* (2004), strongly advocates the need for a significant culture shift to ensure that everyone in society becomes more active, and set out guidelines for the amount and type of physical activity that children, young people and adults should take part in each week in order to enjoy the full range of health benefits.
- 2.8 The Foresight / Department of Science report Tackling Obesities: Future Choices (2007), identifies levels of physical activity as one of four key determinants of obesity and highlights the escalating costs to the NHS. It also recognises that interventions to increase physical activity levels could be effective, but that to have a real impact on obesity would require far greater change than anything tried before.
- 2.9 Healthy Weight, Healthy Lives (2008) acknowledges the growing problem of the so called 'lifestyle diseases', of which obesity is the foremost. It identifies prevention, rather than treatment, as being more likely to deliver greater overall increases in healthy life expectancy, and recognised the need for physical activity to become the norm. In so doing, it marks an important shift towards supporting people in making healthy choices.
- 2.10 The follow-up report, *Healthy Weight, Healthy Lives: One Year On* (2009) identifies the need to give people opportunities to make healthy choices and maintain a healthy weight, and

recognises that making it easier for people to be active would be vital in achieving this ambition.

- 2.11 The White Paper, *Healthy Lives, Healthy People* (2010) reiterates the need for action to address lifestyle-driven ill health. It sets out a radical new approach, which recognises the need to create a public health service, rather than a national sickness service, and harness efforts across society in order to tackle these issues.
- 2.12 Most recently, the Chief Medical Officers for the four home nations published Start Active, Stay Active (2011). This report establishes a UK-wide consensus on the amount and type of physical activity people should do at each stage of their lives, and updates the existing guidelines for children, young people and adults, as well as introducing new guidelines for early years and older people for the first time. It calls on all those organisations with a part to play local government, business, third sector organisations, planners, sports and local champions to make physical activity not just an aspiration for the few, but rather a reality for all.

## **Olympic Legacy**

- 2.13 Playing to Win: A New Era for Sport (2008) identifies increased physical activity as an important legacy of the Olympic Games, and establishes the aim of getting 1 million more people participating regularly in sport, and 2 million more people physically active by 2012.
- 2.14 Before, During and After: Making the Most of the London 2012 Games (2008) sets out an action plan to stimulate long term benefits from hosting the Olympic Games, including inspiring a significant and sustained increase in participation. This specifically recognises the need to strengthen the sporting infrastructure in order to offer a wider range of sports and physical activities, attract more people, and improve the mechanisms to keep then inspired and active. It also acknowledges that private sector investment will be crucial to delivering the legacy of the London 2012 Games.
- 2.15 Be Active, Be Healthy (2009) establishes a new framework for the delivery of physical activity for the period leading up to the London 2012 Olympic Games and beyond. It encourages more physicial activity for the benefit of individuals and communities, as well as for its potential to deliver substantial overall cost savings to the nation.

# 3. Key Issues and Proposed Changes

## **Delivering Sustainable Development**

- 3.1 The UK is experiencing an unprecedented period of austerity, and the public sector is now facing its most serious funding challenge for many years. Sustainable economic growth is desperately needed, and the planning system has a key role in helping to build a strong economy and support development.
- 3.2 The Oxylane Group therefore welcomes the strong emphasis on delivering sustainable economic growth in the draft NPPF.
- In particular, we support the presumption in favour of sustainable development (paragraph 13), and the onus on local planning authorities to plan positively for new development (paragraph 14).

## Plan-making

- 3.4 Oxylane agree that Local Plans should be aspirational (paragraph 22), and support the requirement for planning applications to be determined in accordance with the NPPF in the absence of an up-to-date and consistent plan (paragraph 26).
- 3.5 We also agree that local planning authorities should have a clear understanding of business needs and strongly support the requirement for them to work closely with the business community to identify and address barriers to investment (paragraph 29).
- 3.6 Similarly, we support the need to use this evidence base to assess the land and floorspace requirements for all types of economic activity, including for retail and leisure uses (paragraph 30), which should include commercial sports facilities.
- 3.7 We are concerned, however, that the NPPF fails to require local planning authorities to effectively plan for the delivery of facilities in a similar way to housing policies, which require the deliverability of housing supply to be tested through Strategic Housing Land Availability Assessments.
- 3.8 The absence of any mechanism to require the delivery new facilities that will meet future sports and recreational requirements is a key weakness. The lack of any check on deliverability simply leaves to much to chance, and in the current economic climate will likely result in the failure to deliver new facilities.

## **Health and Well-being**

- 3.9 The requirement in paragraph 38 for local planning authorities to work with public health leads and health organisations to understand and take account of the health status and needs of the local population and identify relevant barriers to improving health and well-being is welcomed. However, it remains unclear quite what the outcome of this collaboration should be. The NPPF should therefore require that planning policies promote development that contributes towards improvements in health and well-being.
- 3.10 Also, given the unequivocal evidence that regular physical activity delivers significant health benefits, and the key role of the planning system in shaping our environment, we consider that paragraph 38 should specifically require local planning authorities to encourage development that promotes physical activity or provides opportunities for people to participate in sport and active recreation.

#### **Proposed Changes – Paragraph 38**

38. Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population, including expected future changes. <u>Planning policies should support and any information about relevant barriers to improving development that contributes towards improvements</u> in health and well-being, <u>including development that provides opportunities for physical activity or for people to participate in sport and active recreation.</u>

#### **Retail & Leisure**

- 3.11 Oxylane strongly support the requirement for local planning authorities to allocate a range of suitable sites, sufficent to meet retail and leisure needs *in full* (paragraph 76).
- 3.12 However, whilst town centres provide an appropriate location for much of the commercial retail and leisure sector, the Oxylane Group objects to the notion that 'one size fits all' in sectors as diverse as these.
- 3.13 Town centre first policies impose an unnecessary constraint on large scale, outdoor and multi-sport developments in particular, which puts at risk the important contribution that such developments can make towards growing participation in sport and active recreation, and improving public health. It also places an unnecessary burden on applicants, who have to

- undertake extensive and costly assessments of potential alternative sites, which fail to take account of the particular business model and associated commercial drivers for site selection.
- 3.14 The NPPF should therefore specifically require local planning authorities to provide for the varied locational requirements of different retail and leisure formats, including large scale sports facilities.
- 3.15 Also, the requirement for local planning authorities to set policies for the consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres (paragraph 76), is inconsistent with the aims of ensuring that the planning system does everything thing it can to support sustainable economic growth, and that retail and leisure needs are met in full. It should therefore be strengthened, to require that planning policies support the delivery of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.
- 3.16 In addition, prior to allocation, local planning authorities should be required to assess the availability, suitability and viability of potential sites, in order to ensure that they are deliverable, which is consistent with the approach taken in relation to housing sites. Oxylane also consider that the wording in paragraph 78, regarding the need to assess potential sites for their availability, suitability and viability, could be amended to provide a greater degree of clarity.
- 3.17 Finally, we support the removal of the requirement to consider the scope for disaggregating parts of a retail or leisure development onto separate sequentially preferable sites, as this ran counter to the aim of promoting attractive mixed-use developments, and undermined the delivery of sustainable sport facilities.

#### **Proposed Change – Paragraph 76**

- 76. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. Local planning authorities should...
  - allocate a range of suitable sites to meet <u>identified</u> the scale and type of retail, leisure, commercial, community services and residential development needs in town centres. It is important that retail and leisure needs are met in full and are not compromised by limited site availability. Local planning authorities should therefore <u>assess the availability</u>, <u>suitability and viability of potential sites for the full range of retail and leisure formats, and</u>

- undertake an assessment of the need to expand town centres to ensure a sufficent supply of suitable sites
- allocate appropriate edge of centre sites where suitable and viable town centre sites are not available, and if sufficent edge of centre sites cannot be identified, set policies for meeting the identified requirements in other accessible locations; and
- set policies for the consideration to support the delivery of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.

#### **Proposed Change – Paragraph 78**

Local planning authorities should prefer locations for retail and leisure uses to be located in town centres where practical, then in edge of centre locations and only if suitable <u>and deliverable</u> sites are not available should out of centre locations be considered. In applying this sequential approach, local planning authorities should ensure that <u>applicants demonstrate</u> that there are no sequentially preferable sites that are available, suitable and viable potential sites are assessed for their availability, suitability and viability and for their ability to meet the full extent of assessed quantitative and qualitative needs.

# **Sport and Leisure**

- 3.18 Against the background of cross-governmental policy, paragraph 128 of the draft NPPF should acknowledge the enormous beneficial effects of regular participation in sport and physical activity, and place much greater emphasis on the contribution that access to good quality open spaces and opportunities for sport and recreation makes to health and well-being.
- 3.19 Similarly, we consider that the role of the planning system, in creating an environment where activities are made easier and public health can be improved, is significantly underplayed in paragraph 128. This is in stark contrast to the positive statements in respect of housing supply, where local planning authorities are required to both identify sites and ensure that they are deliverable.
- 3.20 The needs based approach set out in the draft NPPF (paragraph 128) is based on the existing guidance in PPG17, which was originally published in 1994 and reissued in 2002. It therefore

pre-dates all of the current cross-governmental policy linking sport and physical activity with public health, and the London 2012 Olympic legacy objectives for significant and sustained growth in sports participation and the numbers of people that are physically active.

- 3.21 This approach fails to take account of existing low levels of participation, which are among the worst in western Europe (the lastest Sport England Active People Survey found that only 16.3% of adults participate in at least 3x30 minutes of moderate intensity sport each week), and that with high and rising levels of obesity in society, it is now essential to effect the changes that will support people in living healthier lives.
- 3.22 More importantly, however, it places an unnecessary and unhelpful restriction on delivery, which is inconsistent with the aforementioned wider cross-governmental policy objectives.
- 3.23 In practice, the 'need' for new sports and recreational facilities is derived from, and therefore continually reinforces, existing low levels of participation. This is because the planning system requires that proposals for new sports and recreational facilities are justified on the basis of identified need.
- 3.24 For example, if a local planning authority considers that there are sufficient facilities within their area to broadly meet current demand based on current low levels of participation, then identified needs will be small, and the perceived requirement for new facilities will be low.
- 3.25 This makes it very difficult to justify new sports and recreational facilities, especially when the identified need is geographically dispersed. For example, there may not be one site from which all of the identified need can be met, or there may not be sufficient need identified in any one locality to justify the provision of a new facility, even when a cumulative need has been established at the district level.
- 3.26 The result is that new sports and recreational facilities are not delivered, and even identified needs remain unmet.
- 3.27 The fundamental weakness of the needs based approach, however, is that it fails to significantly grow participation, by effectively ignoring the vast majority of people who do not currently take part in sport on a regular basis, and the overarching obligation to encourage those people to be physically active so that they can live healthy and fulfilling lives into old age.
- 3.28 There is therefore a clear contradiction within the NPPF between cross-governmental policy, which recognised the need to significantly grow participation in sport, and planning policy, which seeks only to provide facilities to meet existing demand. This is amplified by the lack of

any requirement within the NPPF for local planning authorities to actively plan for the location of new facilities and ensure that identified sites are deliverable.

- 3.29 The key issue is that the approach within the NPPF will stifle the delivery of new facilities and remove the positive effects that competition between operators will have in providing increased opportunities for participation in sport.
- 3.30 Oxylane therefore consider that the NPPF should be consistent with the Government's health and Olympic legacy agendas, and that locally assessed needs should be used to establish the minimum level of provision required, not the maximum.
- 3.31 Local planning authorities should be required to plan positively for sport, including allocating sufficient deliverable sites for appropriate facilities to meet future needs, based on the aspiration that growth in participation should occur. In effect, the NPPF should remove barriers to the delivery of new facilities and embrace the benefits that greater participation can bring in terms of health and well-being and growth in the wider economy.
- 3.32 The development of new open space, sports and recreation facilities over and above that required to meet identified needs, should be encouraged in order to deliver growth in levels of sports participation.

#### **Proposed Changes – Paragraph 128**

128. Physical activity is essential for good health, and Access access to good quality open spaces and opportunities for sport and recreation is can makes an important contribution to for the health and well-being of communities. The planning system has a key role in helping to create an environment where activities are made easier and public health can be improved. Local planing authorities should consider favourably all proposals for new open space, sports and recreational facilities, where this is consistent with the land use and other policies in this Framework. Planning policies should identify deliverable sites for open space, sports and recreational facilities to meet identified identify specific needs based on an objective assessment of quantitative or and qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. The information gained from this assessment of needs and opportunities should be used to set locally derived minimum standards for the provision of open space, sports and recreation facilities. The delivery of new open space, sports and recreational facilities over and above that required to meet the minimum identified need should be supported within Local Plans. Planning policies should protect and enhance rights of way and access.

- 3.33 The requirement to protect existing open space, sport and recreational facilities from development (paragraph 129) is supported.
- 3.34 However, given the current low levels of participation in sport in the UK, it is almost inconceivable that existing facilities could be deemed surplus to requirements. It is more likely that existing facilities might be of poor quality, badly equipped, or be sited in locations that do not best serve local need.
- 3.35 In such circumstances, Oxylane consider that it might be preferable to secure new provision in a better location, in lieu of retaining the existing facilities. This would have an overall beneficial impact, and therefore paragraph 129, criterion 1 should be deleted, and a new criterion inserted to that effect.

#### **Proposed Changes – Paragraph 129**

- 129. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
  - an assessment has been undertaken which has clearly shown the open space, buildings
    or land to be surplus to requirements; or
  - the need for and benefits of the development clearly outweigh the loss; or
  - commensurate new open space, sports or recreational facilities are to be provided on a
     locationally preferable site within the local area that will continue to meet the identified
     need

#### **Green Belt**

3.36 The requirement for local planning authorities to plan positively to enhance the beneficial use of the Green Belt through, inter alia, providing opportunities for outdoor sport and recreation (paragraph 135), is welcomed. By virtue of its location adjoining urban areas and comprising essentially open land, the Green Belt makes an ideal location for outdoor sports and recreational facilities, and is capable of accommodating a wide range of sports close to major centres of population.

- 3.37 Similarly, the exclusion of new buildings providing appropriate facilities for outdoor sport and recreation from the definition of 'inappropriate development' (paragraph 144) is supported.
- 3.38 However, it is important to recognise that the delivery of sustainable sports facilities requires that the long-term financial obligations be it annual subsidies, maintenance or capital expenditure on local authorities is minimised. This can be achieved through the use of commercial income streams from other 'enabling development' to provide long-term financial sustainability an approach advocated by Sport England in *Delivering Sustainable Sports Facilities* (2008).
- 3.39 However, this is at odds with existing national planning policy, and the draft NPPF, which identifies such development as being 'inappropriate' in the Green Belt. Moreover, it runs counter to the aim of using the Green belt to provide opportunities for outdoor sport, because it is simply not possible to deliver high quality, sustainable sports facilities without complementary commercial uses in lieu of long-term local public susbsidy.
- 3.40 Furthermore, in the absence of any specific guidance in the draft NPPF as to what other considerations should be taken into account in determining whether thare are 'very special circumstances' sufficient to justify 'inappropriate development', Oxylane consider that the NPPF should identify as a key consideration, the extent to which the development supports wider Government policy objectives, and is otherwise consistent with the other policies in the Framework.

#### **Proposed Change – Paragraph 143**

143. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In particular, this will include the extent to which the development supports the delivery of wider Government policy objectives and is consistent with the other policies in this Framework.

Oxylane Group September 2011

# Appendix I

Oxylane Village Concept Masterplan

