

# **Vale of White Horse Local Plan 2031 (Part 1 Strategic Sites and Policies) Examination**

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## **Examination Hearings**

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**Matter 8 – Strategy for  
Abingdon-on-Thames and  
Oxford Fringe Sub-Area (CP8  
– CP11 and CP14)**

**Thursday 4<sup>th</sup> February 2016**

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**STATEMENT PREPARED BY:**



**Woolf Bond Planning**  
Chartered Town Planning Consultants

**On behalf of:**

**TFP Developments**

**Representor No.: 877586**

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**January 2016**

**Main Issue**

***Are there other sites which would more appropriately meet the identified need for new housing?***

**Background**

1. These representations are framed within the context of other statements produced regarding Matters 5 and 11. In summary, these representations refer to, the exceptional circumstances justifying the proposed Green Belt boundary revisions and the importance of meeting the Vale's needs and potentially Oxford City's wider needs in due course in the most sustainable locations and an existing housing land supply deficit in the District. As acknowledged at paragraph 5 of the Council's 'Comments on the Green Belt Review ' document the larger villages in the Green Belt (including Wootton) are some of the most sustainable locations in the Vale (as defined in the Town & Villages Study). This sustainability and their proximity to Oxford make these villages logical locations to meet wider needs arising from Oxford City in due course (consistent with Policy CP2) alongside the Vale's own needs already identified in the Abingdon on Thames and Oxford sub-area (consistent with Policy CP8).
2. With such wider housing growth pressures in mind, NPPF paragraph 83 is clear that when Green Belt boundaries are reviewed, this should be conducted such that the revised boundaries have permanence in the long term and will endure beyond the plan period. It is at this Part 1 stage, that the full Vale Green Belt Review is being undertaken and the NPPF requires that this review should endure beyond the plan period (i.e. beyond 2031). It is for these reasons that it is essential that no logical Green Belt releases are missed at this stage so to ensure appropriate housing delivery be it at the Part 2 stage or to meet the wider needs of Oxford City in these sustainable larger village Green Belt locations. This statement now refers to our client's site to the west of Lashford Lane, Wootton that offers a logical site release from the Green Belt with a view to future housing development.

**Omission Site: Land to the west of Lashford Lane, Wootton**

3. Our client's site extends to 2.35ha, comprising paddock land with an existing access to Lashford Lane via its north eastern boundary. The site boundary is defined on Plan WBP1 attached, whilst a satellite image is provided below. It

offers a logical development opportunity bound by existing residential development on 3 of its 4 sides. Its only boundary that is not formed by residential development, comprises a woodland that forms existing mature screening, containing it from wider more open countryside to the west.



4. The site is well positioned to connect to the major strategic network and access a wide range of facilities and employment opportunities. This includes a bus service sited 415m<sup>1</sup> from the site offering frequent services to larger settlements such as Oxford and Abingdon. On a local level various facilities exist within a short walking distance from the site including a primary school (200m), local convenience shop (600m), community centre (625m), pharmacy (600m) and public house (600m).
5. In terms of landscape impact, the site is not covered by any statutory or non-statutory designations for landscape character or quality. The site is well contained by clearly defined boundaries and has a good relationship to the

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<sup>1</sup> All distances provided are straight line distances taken from the centre of the site.

existing settlement of Wootton, with existing residential development on three sides. The site has a relatively small visual envelope with visibility of the site restricted to the near distance from adjoining residential dwellings. The site's one undeveloped boundary is formed by a mature woodland, ensuring that proposals would not intrude significantly into the wider countryside and would not contribute to coalescence with hamlet settlements located to the west. Overall the site can be developed without giving rise to any significant adverse landscape or visual effects.

6. In terms of heritage impact, the site is not located in or near to a conservation area or any listed buildings.
7. The site is located entirely within flood zone 1 and is therefore a preferable location for residential development having regard to the NPPF sequential test.
8. Part of the site's western boundary abuts the Cothill Fen SSSI and SAC designation that forms part of the woodland abutting the site's western boundary. The Council's SHLAA assesses the site as 'unsuitable' due to its close proximity to the SAC designation. We have appointed an ecological consultant, AAe Environmental to consider the Council's position in this respect and a supporting letter is appended as Appendix A. This letter provides a number of potential mitigation measures that could be implemented so to ensure any future scheme accords with NPPF paragraph 118. In light of this evidence, the Council's assertion that the site is unsuitable for housing development due to its proximity to the SAC is unfounded and a scheme can be brought forward that does not have a significant adverse impact on biodiversity.
9. The above detail confirms the site can be brought forward in a technically acceptable manner in a naturally contained and sustainable location. It is anticipated that the site could come forward for between 50 and 60 dwellings, whilst including areas of open space, sustainable drainage features and retaining existing screening on the site boundaries.

#### **The Council's Green Belt Review**

10. Figure 1 in the Council's February 2014 Green Belt Review: Phase 2 Report splits the Vale's Green Belt land into a number of land parcels for assessment against the NPPF Green Belt purposes. Parcels 4, 9 and 10 abut the settlement of

Wootton, with the subject site lying in parcel 10 (Dry Sandford/Tubney). Page 46 of this document then assesses the settlement edge of Wootton (land lying to the west and north) against the 5 NPPF paragraph 80 principles.

11. In assessing parcel 10, the first purpose (to check unrestricted sprawl) is considered N/A, whilst the area is deemed to make little direct contribution to the setting of Oxford and opportunities for use of derelict or urban land are small in scale in Wootton. Consequently the first, fourth and fifth Green Belt purposes are in effect passed.
12. In terms of the second purpose, the gap of 2.2Km to Appleton and 2.3Km to Cumnor is noted and then reference is made to major development in the open land beyond the settlement edge to the west or north would have the effect of merging Wootton with adjacent hamlets resulting in potential coalescence. The assessment then goes onto review the third purpose and refers to the expansion of Wootton in north, east and south directions, although it has stayed 'well contained by Sandford Brook along the west'. The continued containment along the western boundary is considered important.
13. On the basis of the above, it is our reading that it was on the basis of Green Belt purposes two and three that parcel 10 was not progressed to the Green Belt: Phase 3 stage (where proposed Green Belt amendments to Wootton are defined). We consider the wider assessment of parcel 10 has failed to acknowledge the specific potential of our client's site to meet the 5 Green Belt purposes. Whilst we acknowledge the potential coalescence impact, if development were to occur west of Sandford Brook, such an impact would not occur with the development of our client's site. Having regard to purpose three, the Phase 2 Report rightly acknowledges that the Sanford Brook and its wooded corridor contain the western settlement edge of Wootton. However development of the subject site would not affect this containment lying to the east of this boundary. For these reasons, the site is considerably better related to Wootton than the wider countryside forming the rest of parcel 10. The strategic nature of the Phase 2 Report failed to identify this specific potential and thus the site was excluded from progression to the Phase 3 stage. This represents a fundamental flaw in this part of the Council's evidence base that can be rectified by proposing the site to be released from the Green Belt.

14. The following discussion assesses the site against the Green Belt purposes and compares them to the proposed Green Belt releases at Wootton.

**Assessment of Omission Site against NPPF Green Belt Purposes**

15. Clearly any land release from the Green Belt needs to be consistent with the NPPF paragraph 80 Green Belt purposes. In addition and as required by NPPF paragraph 85, it is necessary to clearly define a revised Green Belt boundary using a recognisable and permanent physical feature. In the absence of a detailed review of our client's site in the Council's Green Belt Review we now assess the site against these tests.

<b>NPPF Paragraph 80 Purpose</b>	<b>Site Assessment</b>
To check the unrestricted sprawl of large built-up areas	N/A. The site would not add to any sprawl from Oxford or from Wootton. "Unrestricted sprawl" is uncontrolled. Development confined to the well-defined and contained site would not represent unrestricted sprawl.
To prevent neighbouring towns merging into one another	The distance between Wootton and Appleton to the west is 2.2Km. Existing residential development adjacent to the site's southern boundary already extends further to the west than the site's western boundary. The site's enclosure by a strong permanent feature ensures no risk of coalescence results in either a physical or visual sense.
To assist in safeguarding the countryside from encroachment	The site is bound by existing residential development on 3 of its 4 sides. Its undeveloped (western) boundary is bound by a mature woodland that forms an identified important physical boundary to the settlement. This strong boundary ensures the countryside is safeguarded from future encroachment.
To preserve the setting and special character of historic towns	This edge of Wootton makes no direct contribution to the setting of Oxford.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Opportunities for use of derelict or urban land are small in scale in Wootton, and in any event the opportunities that arise in either the Vale or Oxford are insufficient to meet identified housing needs.

16. The above assessment confirms that this specific part of Parcel 10 (forming our client's site) can be removed from the Green Belt and developed without having a detrimental effect on the Green Belt purposes set out in NPPF paragraph 80. Our proposed revision to the Green Belt boundary is illustrated by a dark green line to



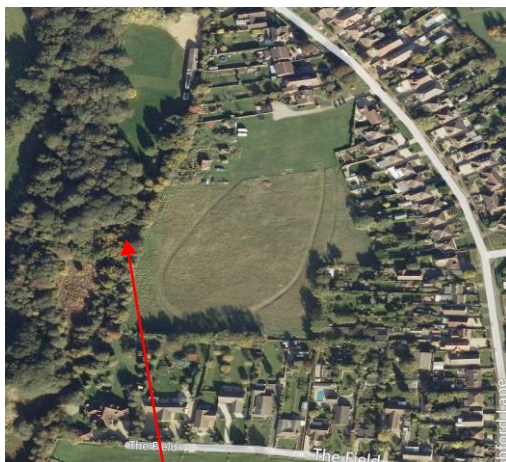
the west of the site on Plan WBP1. Importantly, such a revision would secure a clearly defined boundary, readily defined by the woodland to the west that forms a physical and permanent feature consistent with NPPF paragraph 85.

### **Proposed Alternative Green Belt Releases at Wootton**

17. The above assessment confirms the site's credentials as a logical Green Belt release that appears to have been excluded solely due to the strategic nature of the Green Belt Phase 2 work. We now review the sites identified in the Green Belt Review: Phase 3 work for release at Wootton having regard to NPPF paragraphs 80 and 85.

#### Area 9

18. Whilst bound by existing residential development and a road on its southern and western sides, the site's northern boundary is a low level, single belt of vegetation. This boundary (illustrated on the image below) does not compare with our client's site's western boundary which is characterised by significantly more screening. If Area 9 is acceptable so should Parcel 10, but confined to my client's site.



**Proposed GB Boundary at Client's Omission Site**



**Proposed GB Boundary at Area 9**

#### Area 10

19. This site is bound by existing development on only its southwestern and part of its north western sides. Further it is open to views from the east and north by virtue of its very limited existing vegetation on its north western and eastern sides (see image below). Again our client's site compares very favourably with this proposal, hence its justification for release from the Green Belt too.



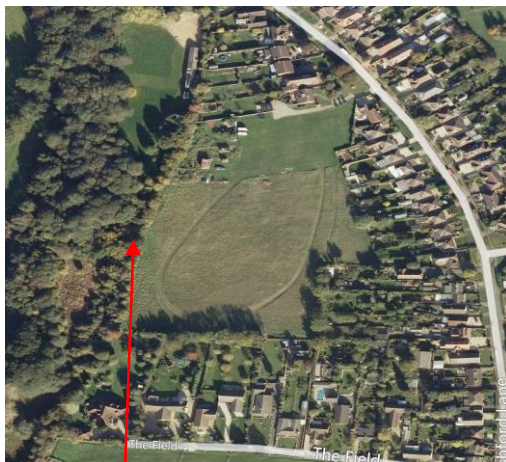
**Proposed GB Boundary at Client's Omission Site**



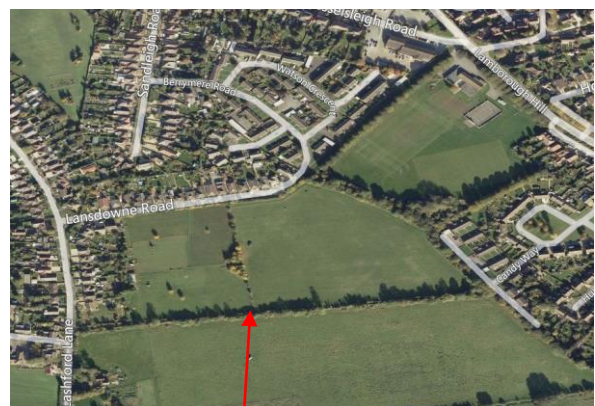
**Proposed GB Boundary at Area 10**

### Area 23

20. The north eastern part of this land forms playing fields that would be protected from alternative development by NPPF paragraph 74. The southern part of the site is bound by some existing residential development, however similarly to area 9 it benefits from a relatively weak southern boundary comprising a single line of vegetation (see image below) compared to the more substantial woodland belt that physically and visually contains our client's site on it's western side.



**Proposed GB Boundary at Client's Omission Site**



**Proposed GB Boundary at Area 23**

21. For the above reasons, the proposed Green Belt release to the west of Wootton is better in Green Belt terms than those proposed in the Local Plan.



**Summary**

22. It has been explained that a flaw in the Council's Green Belt evidence base has resulted in our client's site being excluded from further assessment as a potential Green Belt release. However for the reasons discussed, its release would be consistent with paragraphs 80 and 85 of the NPPF. It has also been explained that in technical terms, the site is entirely appropriate for housing development and suffers from no abnormal constraints. Further the site compares favourably when assessed against the proposed alternative Green Belt releases at Wootton.
23. Land to the west of Lashford Lane, Wootton should be released from the Green Belt with the potential to meeting future housing development (as defined on Plan WBP1). This could be instead of, or in addition to, the other sites proposed for release at Wootton. Such an amendment would assist in providing for a flexible supply of housing land during the plan period and meeting housing needs discussed in other statements.
24. In the absence of this amendment and the necessary testing of our client's site through the Council's Green Belt evidence base, the Plan is unjustified when considered against reasonable alternatives and inconsistent with national policy.

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