

Impact on the Green Belt in Abingdon of the Vale of the White Horse Local Plan



Ticia Lever

a topic report prepared

on behalf of

The North Abingdon Local Plan Group



December 2014

Summary

- The plan ignores Government advice that “protecting our precious green belt must be paramount” and that boundaries should be altered only in “exceptional circumstances”
- Previous plans have always said that protecting the Green Belt land is a priority and that extension of building northwards towards Lodge Hill should be “resolutely avoided”. This has in the past been endorsed by Planning Inspectors
- The recent Green Belt Review did not recommend that the land to the east of the Oxford Road be taken out of the Green Belt
- The Council states that it does not want Abingdon and Radley to join up
- NALPG consider that the characteristics of the land in question have not been properly assessed. The land does in fact make a significant contribution to safeguarding the countryside from encroachment
- The land to the east of Tilsley Park has high landscape value. Also, being on rising land, any building on it would have a large impact and affect the setting and special character of Abingdon
- The Council have not recognised Blake’s Oak Ancient Woodland immediately bordering the site to the West of the Oxford Road
- The land is valuable farmland. The footpaths across it facilitate recreational use. There is a diversity of wildlife including skylarks and the open aspect is a key criterion for the preservation of Green Belt
- The council’s case for building on the Green Belt in the North of Abingdon is not sound

The photographs on the cover are an aerial view showing the site and a photograph of Blake’s Oak Ancient Woodland.

1. Introduction

- 1.1 The revised draft Vale of White Horse Local Plan 2031¹ has included two proposed housing sites, either side of the A4183 Oxford Road for a total of about 800 houses, on 53.82ha, identified as North of Abingdon-on-Thames. They are located in the Oxford Green Belt (Appendix 1). The site is located between Tilsley Park on the west and Peach Croft Farm on the east. For the purposes of this document we will refer to the two combined sites as 'the site', unless otherwise distinguished. This submission will concentrate on reasons why the North Abingdon Local Plan Group (NALPG) believe that building on this sensitive, prominent site in the Green Belt land is contrary to Government advice, would seriously harm the environment and should not be approved. The NALPG was set up in November 2014 by concerned local residents in response to the identification of proposed housing sites in the Oxford Green Belt to the north of the town. The group originally included only residents from the Long Furlong estate but was joined by concerned residents from Peachcroft and other parts of North Abingdon. Due to a very limited time constraint, this submission will deal with the site known as North of Abingdon-on-Thames.
- 1.2 However, many of the issues and concerns, highlighted in other submissions to the Inspector by NALPG, including the SHMA figures, traffic and air quality issues also directly apply to the other site in North Abingdon identified in the draft Local Plan, known as North West of Abingdon-on-Thames. This Proposal is for around 200 houses and should be considered by the Inspector when investigating that site. The Draft Vale of White Horse Local Plan 2031 therefore proposes to release these two sites in the Green Belt to the north of Abingdon, totalling around 1000 houses.
- 1.3 Additionally a further concern is that part of the site to the north of Twelve Acre Drive and east of the A 4183 (Oxford Road), was added at a late stage in October 2014 and late in the Local Plan process. Many residents of Peachcroft, who we believe would be seriously affected by the development, were not aware of the proposal until we notified their North East Abingdon Community Association in November 2014. This site to the east of the A4183 was not been identified as a potential housing site by the Council when the Green Belt Review was undertaken.
- 1.4 We accept there is an urgent need for the council to identify suitable sites for housing and have a five year housing supply, as directed by Government policy. However, we do not consider that this site for 800 houses, straddling the A4183 (Oxford Road), is suitable for housing in the light of long established, tested and recent Government planning policy on the Green Belt, the enormous impact and size of the proposal, and strong local concerns. This submission will focus on the Green Belt issues but other issues including the Housing figures, traffic issues and air quality are addressed in other submissions by NALPG.

¹ Available from <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/new-local-plan-2031>

- 1.5 A substantial part of this submission deals with the findings of previous Local Plans approved by the Government, but this is vital evidence to reinforce the fact that this substantial area of the Oxford Green Belt has an important contribution to make, which has been recognised, and has been vigorously defended in the past by the Vale Council.
- 1.6 The structure of this report is as follows. A summary of government advice on Green Belts is presented in Section 2. Section 3 contains some background on the Oxford Green Belt. The implications of The Vale of White Horse Draft Local Plan 2031 for the Green Belt are discussed in Section 4. The arguments for why this site makes a high contribution to the Green Belt are summarised in Section 5. A number of supporting documents are contained in Appendices at the end of the report.

2. Government Advice on Green Belts

- 2.1 Government advice in National Planning Policy Framework 2012 (NPPF 2012)² states in paragraph 79 that *'The fundamental aim of Green Belts policy is to prevent urban sprawl by keeping land permanently open, the essential characteristics of Green Belts are their openness and their permanence.'* The National Planning Policy Framework goes on to state in paragraph 83 that *'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.'*
- 2.2 The Policy in paragraph 80 clearly states the five purposes of the Green Belt which have been long established. These are as follows:
- *to check the unrestricted sprawl of large built up areas;*
 - *to prevent neighbouring towns merging into one another;*
 - *to assist in safeguarding the countryside from encroachment;*
 - *to preserve the setting and special character of historic towns; and*
 - *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Appendix 2 contains the Section of The National Planning Policy Framework 2012 on **Protecting Green Belt Land**.

- 2.3 An announcement on 4th October 2014 by the Government Communities Secretary, The Rt Hon Eric Pickles and the Housing and Planning Minister Brandon Lewis confirmed that Councils must protect our precious Green Belt and that Ministers have underlined the Government's commitment to protect the Green Belt from development. Appendix 3 of this document includes the Press release³.
- 2.4 In the Government Press release updated on 6th October 2014 Eric Pickles said:

² www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³ www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land

This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development.

Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area'.

The NALPG believes that by identifying this physically prominent site in the established Green Belt, the Council is wilfully ignoring long established and very recent Planning advice.

- 2.5 In August 2014 for instance The Daily Telegraph disclosed official figures showing that 15 new homes in England are now approved on Green Belt land every day⁴. This cannot be allowed to continue. The recent planning guidance reinforces the policy that *'once established, Green belt boundaries should only be altered in exceptional circumstances.'* We have seen no clear evidence that a case for exceptional circumstances has been made by the Council when considering this site.
- 2.6 In the same Press release the Planning Minister Brandon Lewis stated *'We have put Local Plans at the heart of the reformed, planning system, so councils and local people can now decide where development should and shouldn't go.*

The establishment of the NALPG in November 2014 by local residents followed two well attended public meetings held in Long Furlong Community Centre, and aims to put the strong concerns and evidence of many local people in North Abingdon to the Planning Inspector. We want to have our say!

- 2.7 The Government guidance published on 6th October 2014 also significantly states *'The National Planning Policy framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.'*

We note that the Council has not identified a sufficient Five Year housing supply and has in the past under-supplied. However, there are strong and substantiated local concerns to the proposed site and NALPG welcomes the opportunity to put these concerns to the Inspector.

- 2.8 The advice included in NPPF 2012, and the more recent 4th October 2014 announcement, will be of crucial importance when considering the proposed housing sites, the subject of this submission. This Government advice and the decisions of previous Planning Inspectors help substantiate our case.

3. The Oxford Green Belt

- 3.1 The Oxford Green Belt was approved by the Secretary of State for the Environment in 1975 as an amendment to the County Development Plan. The Green Belt policy

⁴ Quoted in www.telegraph.co.uk/earth/greenpolitics/planning/11139303/New-protections-for-Englands-Green-Belt-unveiled-by-Eric-Pickles.html

operated on an interim basis in some areas of land to the north of Abingdon and Oxford, to allow a limited amount of development to meet some of Oxford's housing and employment needs. The inner boundaries of the Green Belt around Abingdon were confirmed by the adoption of local plans to the north of Abingdon in 1983, and around Oxford in 1991.

- 3.2 We do understand that it is appropriate for the Council to review the Green Belt boundaries, as they have not been reviewed since 1991 when The Oxford Fringe and Green Belt Plan was adopted, but we do not consider that a strong and robust case has been made to justify releasing such a large area of prominent and important Green Belt land.
- 3.3 Protecting the Oxford Green Belt has been a priority that has been acknowledged and endorsed by previous Local Plans considered by Government Planning Inspectors, and adopted by the Vale council, including the 1983 Abingdon Local Plan. The 1983 Plan stated that in relation to the north and north-east of Abingdon that the *'land is least constrained but even there, as the Structure Plan acknowledges, development would affect high quality agricultural land, make further incursion into the Green Belt and threaten the valuable tract of open land between Abingdon and Radley. The gap of open countryside between Abingdon and Radley is considered by the District Council to be very important and must be firmly maintained. Any possibility of unrestrained extension of the built up area towards Lodge Hill must also be resolutely avoided – as with Oxford, it is important to protect the rising ground which forms the landscape rim of the town.'* (Abingdon Local Plan, Vale of White Horse District Council, July 1983) Thus the Planning Inspector acknowledged the prime importance of the open countryside between Abingdon and Radley, to maintain the gap between the two settlements, and also the importance of protecting the land which rises up towards Lodge Hill. These two important factors are as relevant today as they were in 1983 and are critical to the functioning of the Green Belt in this area.
- 3.4 In the Oxford Fringe and Green Belt Local Plan adopted in March 1991, the Vale stated:
- 'In the particular circumstances of The Oxford Green Belt, only a few small parcels of land in the Vale's part of the Interim Green Belt are available to meet longer term development needs. In most places boundaries need to be drawn tightly around existing development, or areas which are proposed for development during the lifetime of the Local Plan.'*
- 3.5 The Planning Inspector in his report⁵ on this plan agreed with the Council, stating that:
- 'Although the proposals of this Local plan in defining the boundaries of the Green Belt are certainly very restrictive I consider that the strictest control over the extension of the built-up areas into the surrounding countryside is essential if the setting of Oxford*

⁵ Oxford Fringe & Green Belt Local Plan Public Inquiry into Objections Inspector's Report and Recommendations, October 1990

is to be preserved. Although this Local Plan area is, of course, but a limited part of that setting it does, in my opinion, relate to a particularly important and vulnerable area comprising the high ground to the west of the City and the water meadows between the two which are a vital component in that landscape. In general, therefore, I endorse the main lines of the plan's proposals for the Green Belt and will proceed to examine the precise boundaries in the context of several objection sites.'

- 3.6 In this plan one of the objection sites that the Inspector considered was in Radley for 2 hectares of proposed housing at the rear of existing dwelling houses in Foxborough Road and partly at the rear of houses in White's Lane. The Council was concerned that if this site were developed, it would conflict with the principles of the Green Belt since the gap between Abingdon and Radley was particularly vulnerable to the possibility of coalescence. Thus the Council in its submitted evidence was concerned that both North Abingdon and Radley could physically join up.

- 3.7 The Inspector accepted that the site would:

'not encroach into the narrow gap which separates 2 communities but it would represent a very real encroachment of the built up area of Radley into the open countryside. So vulnerable is the position of Radley in its context that I consider the Council to be correct in seeking to exercise extremely strict control over its outward expansion to protect, what is, at present its rural setting.'

Thus the Inspector agreed with the Council's strict control of development to prevent the two communities growing together.

- 3.8 On the evidence produced here it is clear that successive Planning Inspectors acknowledge the significant importance of a gap between North Abingdon and Radley and its vulnerability to inappropriate development.
- 3.9 The current Local Plan is the Vale of White Horse Local Plan 2011 which was adopted in July 2006. In this the Council adhered to the Planning advice at the time which was stated in Planning Policy Guidance Note 2: Green Belts. The Council concluded that no exceptional circumstances necessitated a revision of Green Belt boundaries. Additionally it stated that a fundamental aim of Green Belt policy is to keep land permanently open and that new building would be severely restricted and only allowed for a limited number of purposes.
- 3.10 In March 2012 the NPPF 2012 was published and it is this document that sets out the current Government's Planning policies. Appendix 2 contains the Section on **'Protecting Green Belt Land'**.
- 3.11 In May 2014 Oxford City Council published a paper 'Investigation into the potential to accommodate urban extensions in Oxford's Green Belt'⁶. This Informal Assessment included a very large area of land to the north of Abingdon, including this site.

⁶ <http://www.oxford.gov.uk/Library/Documents/Planning/Informal%20Green%20Belt%20Assessment%20May%202014.pdf>

However, this submission will deal only with the North of Abingdon-on-Thames site proposed by the Vale Council.

- 3.12 On Thursday 11th December 2014 it was announced in The Oxford Times that in 2015 there will be a County-wide review of the Oxford Green Belt. This Review is scheduled to be completed in June 2015 and Oxford City Council and the four rural district councils, including the Vale, have signed up to this Review to meet Oxford's Housing needs. In view of this we consider it is even more important that the merits or otherwise of the proposal for this site are thoroughly investigated.

4. The Vale of White Horse Draft Local Plan 2031

- 4.1 It is accepted that in the Vale of White Horse there has been an under supply of housing in the past and the Council needs to identify more housing sites, but this is not a justification for allowing this development in the Oxford Green Belt.
- 4.2 The Council's policy in the draft Local Plan 2031 on The Oxford Green Belt is **Core Policy 13** (Appendix 4). This policy has been informed by a local 'Green Belt Review' by private consultants to form part of the evidence base⁷. The Review published in February 2014 proposes alterations to the boundary of the Oxford Green Belt in a number of locations, including part of the site which is the subject of this submission **but only on land to the west on the A4183**. The Review is only one tool for assessing the suitability of land for development and it is important to note that the consultants themselves did not consider that land to the east of the A4183 should be removed from the Green Belt.
- 4.3 The Green Belt Review assessed land around the Vale settlements against the five purposes of the Green Belt policy as set out above in NPPF 2012 (See Para 2.2 above). The Review concluded that some areas of land, which no longer met the purposes of the Green Belt could be released around these settlements. This included the site located to the west of the A4183 which forms part of this submission. The Council states on Page 62 of the draft Local Plan:
- 'For this reason, the development of these sites will not harm the purposes of the Oxford Green Belt, which will continue to be protected in accordance with **Core Policy 13**.'*
- 4.4 The Assessment Criteria included in The Green Belt Review is set out clearly in Table 1 of The Green Belt Review: Phase 2⁸. Under the second criterion **'to prevent neighbouring towns merging into one'** it gives the following explanation:

⁷ www.whitehorsedc.gov.uk/sites/default/files/Green%20Belt%20Phase%201&2%20Report%20final%20February%202014_reduced%20pdf.pdf

⁸ Available from http://www.whitehorsedc.gov.uk/sites/default/files/Green%20Belt%20Phase%201&2%20Report%20final%20February%202014_reduced%20pdf.pdf

'For this criterion, the 'town' that should be considered is Abingdon-on-Thames in the first instance, but also other settlements currently inset to the Green Belt, which are Appleton, Botley, Cumnor, Kennington, Radley and Wootton. Though most of these are villages rather than towns, the Vale would not wish to allow these settlements to merge.'

- 4.5 Thus the Council states again in this Draft Plan that it does not want Abingdon and Radley to merge but in proposing this site, especially the area to the east of the A4183 they are going against their own consultants criteria, as if allowed, there will be very little gap between the new housing and Radley and this will make the remaining land even more vulnerable.
- 4.6 The first stage of The Green Belt Review was to identify suitable land parcels to form the basis of an assessment. The consultants concluded that the sub division into land parcels should follow linear boundaries which are readily visible on the ground but contain landscapes of a well-defined character. This methodology led to the definition of eleven land parcels in the existing Green Belt, with a further two in an additional area under review to the west of Abingdon. The two sites considered in this submission are classified in different land parcels. NALPG consider that this is a very broad brush approach and there is insufficient detail included in each Land Parcel to properly assess the characteristics of the land and the contribution it makes to the Green Belt. However, a more detailed assessment has been made of the site to the east of the A4183, as will be detailed later in this submission.
- 4.7 The proposed site that is to the west of the A4183 is in Land Parcel 9 and the proposed site to the east of that road is in Land Parcel 8. This is clearly seen in Figure 1: Vale of White Horse Oxford Green Belt Review Study Area showing Land Parcels 1 to 13 and Settlements (Appendix 5).
- 4.8 Section 9 of The Green Belt Review assessed the Settlement Edge Characteristics by Land parcel against the five purposes of the Green Belt.

Part of the Site East of the Oxford Road

- 4.9 In the assessment of **Land Parcel 8: Foxborough Hill and Radley Wood**, both Sections A and B are pertinent when considering the proposed housing to the east of the A4183. In **A. Settlement edge of Radley: Radley College** (Appendix 6) the report under the criteria 'To assist in safeguarding the countryside from encroachment' states that *'West of White Lane the settlement edge is part of the swathe of countryside that extends north-west up to Lodge Hill. The areas east of the lane are contained by the built form and make a lesser contribution to safeguarding the countryside.'*

The settlement edge and the built form both refer to Radley village. It would be reasonable to conclude that the land between the edge of Radley and Lodge Hill is considered to make a significant contribution to safeguarding the countryside from encroachment.

- 4.10 In the analysis of **B. Settlement edge of Abingdon: Radley Park** (Appendix 6) under 'To prevent neighbouring towns from merging into each other' the report states *'This open landscape with long views is important in maintaining the separation of Abingdon and Radley. The openness of the area is important to the physical and visual containment of Abingdon.'*

The same table also acknowledges the *'The pressure for housing expansion at Abingdon means that the protection of this valued part of the Green Belt plays an important role in maintaining the need to encourage the use of land of a lesser environmental quality in the town.'*

- 4.11 The Green Belt Review suggested therefore that the land to the east of the A4183 (including the proposed housing site for 390 dwellings) made a valued contribution to the Green Belt. Yet the Council have now included part of this significant land for a large housing development!
- 4.12 A recent landscape and feasibility study⁹ was commissioned by the Council for land to the east of the A4183 including this specific site and is part of the Council's evidence base. However, it is difficult to find amongst the myriad of Local Plan documents.
- 4.13 The report concludes in Paragraph 5.2.2 *'The two arable fields forming the western part of the study area are more contained and would relate better to the existing settlement and housing proposed to the west of Oxford Road. These fields make a limited contribution to the Green Belt, namely the safeguarding the countryside from encroachment.'*
- 4.14 Paragraph 5.2.7 of this report states *'The study area remains a more sensitive landscape than the land to the west of Oxford Road, as identified within the capacity study (Ref 1) and should not be developed before the land to the west of the Oxford Road. If the area were to be put forward as a strategic site, careful consideration would be needed to provide an amended Green Belt boundary that was robust and defensible.'* We are still waiting for the Council to make a robust and defensible case.
- 4.15 Additionally there is confusion since the latest plan published by the Council in November 2014 'Local Plan 2013 Draft Adopted Policies Map' clearly indicates part of the Green Belt to be within the proposed Housing site (Appendix 7). We have been verbally informed by the Council that this is because of its landscape contribution. Further research by us shows that this is identified on the Consultant's Site Analysis Map dated August 2014 as a 'Sensitive Landscape' (see Appendix 7). It can therefore reasonably be assumed that this eastern area of the site (approximately a third) would not be developed for housing as it would remain in the Green Belt, so now only approximately two thirds of the remainder of the site is now proposed for 390 houses!

⁹ North Abingdon, Land to the East of Oxford Road, Landscape and Visual Feasibility Study by Hankinson Duckett Associates for Vale of White Horse District Council, August 2014. Available from <http://www.whitehorsedc.gov.uk/sites/default/files/LVIA%20Report.pdf>

Part of the Site West of the Oxford Road

- 4.16 The site to the west of the A4183 is for a larger housing development of 410 houses and falls within **Parcel 9: Shippon and the airfield B. Settlement edge of Abingdon: North of Wildmoor** of the Green Belt Review (Appendix 8). Under the criterion 'To prevent neighbouring towns merging into each other', the report confirmed the importance of maintaining the separation of Abingdon from Wootton, which we agree with, but considered that to the '*east of the A34 the settlement edge is heavily influenced by modern urban uses and contained by the elevated A34 thus having a much lesser contribution to the sense of separation*'.
- 4.17 This statement contains broad generalisations that we do not agree with. We argue that this site to the east of Tilsley Park is not 'heavily influenced by modern urban uses', it is currently farmed and provides residents of Abingdon with a pleasant open and rural view, to a raised landscape to the north, including Lodge Hill. The public footpath across this site is extremely well used by the residents of North Abingdon enjoying the amenities, and continues beyond the site, across the A34 and open fields to Sunningwell but also across to Lodge Hill in the east. This particular site, of which only a small part of it is bordered by the busy and noisy A34 to the north west, does provide a much valued green lung to the residents of North Abingdon. Additionally, as will be clear from the site inspection, the A34 is not elevated along the length bordering the site. No in-depth study of the intrinsic landscape value of this part of the site has been undertaken.
- 4.18 We would also agree with the Green Belt Review report's findings as stated in the final section of the table **B. Settlement edge of Abingdon: North of Wildmoor** that '*The pressure for housing expansion at Abingdon means that the protection of this valued part of the Green Belt plays an important role in maintaining the need to encourage the use of land of a lesser environmental quality in the town*' (Appendix 8). The recent Government advice in October 2014 re-iterates the requirement of councils to prioritise brownfield sites and protect the Green Belt from development. By allocating this site the council has chosen the easy option but ignored Government advice and the strong concerns of the residents of North Abingdon.
- 4.19 To add further confusion the Council's supporting document Green Belt Review Phase 3 Report¹⁰ was published by the Council in November 2014. The report is titled 'Amendments to boundaries of The Green Belt around inset villages and the new inset village at Farmoor.' However, the very first map on page 2 is of 'Abingdon: Proposed Changes' and shows the proposed alterations to the boundaries of the site, the subject of our submission, to the west of A4183 based in the consultant's interpretation of the contribution of this edge of settlement area to the purpose of the Green Belt and its open character. First we know that Abingdon is not a village, so

¹⁰ Available from <http://www.whitehorsedc.gov.uk/sites/default/files/Green%20Belt%20Phase%203%20Report%20Feb%202014.pdf>

the title of this report is extremely misleading and important information should be easy to find. Secondly, the site to the east of the A4183 is not considered in this document, as again the consultants presumably do not consider it should be removed from the green belt.

- 4.20 The Green Belt Review concluded that the site to the west of the A4183 (in addition to others in North Abingdon) *'no longer meet the purposes of the Green Belt. For this reason, the development of these sites will not harm the purposes of the Oxford Green Belt, which will continue to be protected in accordance with **Core Policy 13.**'* Page 62 of draft Local Plan 2031. NALPG does not agree with this and challenges the credibility and validity of this conclusion, for the reasons given in this submission.

Blake's Oak Ancient Woodland

- 4.21 The Council has been negligent in that they have failed to identify Blake's Oak Ancient Woodland, which directly abuts the western site on the northern edge. This is not identified on the plan of the site (Appendix 1) as it should have been, nor mentioned in the accompanying text. The Council have a responsibility to assess whether the needs and benefits of a planning application would outweigh the loss/deterioration of ancient woodland. Natural England appear to be only aware of this proposed housing allocation when we consulted them requesting Agriculture Land Classification (ALC) survey information for the site. Their detailed response on both the ALC and the Blake's Oak Ancient Woodland are attached in Appendix 9.
- 4.22 Ancient Woodlands are areas that have been wooded continuously since at least 1600 and cover less than 2% of the UK.
- 4.23 Blake's Oak wood is clearly identified on a map dated 1875¹¹ and is 0.33 hectares in size. We have consulted The Woodland Trust but they have no further data on the wood. However Blake's Oak is important historically and we have found several references to it, notably in 1891 by Anthony Wood. This is clearly set out in the book *'The History of Radley'*¹² and refers to an incident on Wednesday, 2nd November 1642 and quotes from Anthony Wood *'All the foote men marched out of Oxford to Abington, and so toward Henly uppon Thames; but in their passage, and within a mile of Abington, there was one Blake, a groome of the Kinges bedchamber, hanged on a tree for treason against the Kinge; he should have betrayed the Kinge and his 2 suns to the earle of Essex at one Sir Robert Fisher's house'* (Wood 1891).
- 4.24 There is a further note, ninety years later, which states *'the oak on which he was hanged is still (1732) standing and is called by the name of Blake's Oak'*.
- 4.25 We consider that the importance of Blake's Oak wood should not be overlooked, from its importance as an Ancient Woodland, including undisturbed soils and biodiversity contribution, in addition to its historical importance.

¹¹ See Ordnance Survey County Series: Berkshire 1:2,500 1875 map for national grid SU50479961.

¹² *'The History of Radley'*, Radley History Club, 2002, ISBN 0-9542761-0-8.

- 4.26 Ancient Woodland support a very large number of species, many of them rare and threatened, and therefore protected. The nature of Ancient Woodland is such that below ground there is a mycelium structure with filaments that as a single organism would extend under every single tree and out into the fields at their margins. These mycelia succour the trees, controlling their water supply in a sustainable (symbiotic) way.
- 4.27 Ancient woods are irreplaceable features of our landscapes since they take hundreds of years to develop, and are recognised in UK planning policy but do not have statutory protection. Since Ancient Woodland often have unique features, such as relatively undisturbed soils and communities of plants and animals that depend on the stable conditions that ancient woodland provides.
- 4.28 We are concerned about the impact that any new housing may have. The construction of housing in the immediate vicinity with all its associated ground work and over paving, not to mention the additional over paving that residents will install, will totally change the nature of the woodland. Once altered it can never be restored. Once damaged it is impossible to replace it.
- 4.29 Government advice on Ancient Woodland is that planning authorities should refuse planning permission for any development that leads to their loss or damage. The only exceptions are when the benefits of a development clearly outweigh that loss or damage. The development of a substantial housing estate on the boundary will inevitable have a serious and damaging impact on Blake's Oak. Two excellent reports by The Woodland Trust examine the impact of nearby development on the ecology of Ancient Woodland^{13, 14}.
- 4.30 We believe the importance of Blake's Oak Wood should have been recognised and a comprehensive study undertaken prior to the Council proposing housing on adjoining land. If the Council has not recognised the existence of Blake's Oak, an established Ancient Woodland, how can we have confidence that they have carefully considered other factors in proposing this site for housing?
- 4.31 Moreover a more modern piece of woodland bordering Blake's Oak has been proposed to be included in the area for development. This is not indicated on the plan, but can be seen on the ground and on Google Maps.
- 4.32 Natural England also stated in their response to us, that the site is within close proximity of Sugworth Site of Special Scientific Interest and they would expect to be

¹³ P.M. Corney, R.J. Smithers, S.J. Kirby, G.F. Peterken, M.G. Le Duc, & R.H. Marrs, '*Impacts of nearby development on the ecology of ancient woodland*', Woodland Trust, 2008, available from <https://www.woodlandtrust.org.uk/mediafile/100168350/Impacts-of-nearby-development-on-the-ecology-of-ancient-woodland.pdf>

¹⁴ L. Ryan, '*Impacts of nearby development on ancient woodland – addendum*', Woodland Trust, 2012, available from <http://www.woodlandtrust.org.uk/mediafile/100168353/Impacts-of-nearby-development-on-the-ecology-of-ancient-woodland-addendum.pdf>

consulted on any future planning application on the site. Yet the Council have not mentioned this in their written appraisal of the site.

General Green Belt Considerations

- 4.33 NALPG considers that the combined site is on open green fields in the Oxford Green Belt, which could be considered to be the Abingdon-on-Thames Green Belt, and it provides a clear green gap on both sides of the A4183 road before one reaches Abingdon from the north. The proposal to build 800 houses on the site is enormous. The clear gap would be lost forever.
- 4.34 A report by Natural England and the CPRE 2010 titled 'Green Belts: a greener future'¹⁵ concluded
- 'The Green Belts already make a huge contribution to green infrastructure. With new challenges presented by climate change, along with additional pressure for new housing in the future, the Green Belts and all urban fringe land surrounding towns and cities could take on an even more significant role in providing an environmental resource for England's population.'*
- A summary of this report is included in the Vale of White Horse Green Belt Review: Phase 2 Report.
- 4.35 NALPG does not believe that there are proven exceptional circumstances to allow such an enormous swathe of Green Belt land to be released. One of the original justifications by the Vale Council for releasing the site to the west of the Oxford Road was that *'Development (was) not to extend east of the A4183 to protect the open gap between Abingdon-on Thames and Radley and to protect the integrity of the Oxford Green Belt.'* (February Consultation Draft Plan, Page 37). However despite this, the Council, late in the Local Plan process, has now released another enormous area of Green Belt land for a total of another 390 houses! This has resulted in the proposed development being very close to Radley village, to the detriment not only of the character and openness of the Green Belt, but also to Radley and the proposed housing site on the North West Radley site and also to the significant detriment of the amenities of the residents in North Abingdon. The Council in one dramatic stroke has reversed their long established policy, confirmed by approved Local Plans, of protecting the permanence and preserving the open character of the Oxford Green Belt! This is contrary to government advice.
- 4.36 The very gap that the Council has in the past been protecting would now be seriously eroded! Surely if the council were serious in wanting to protect the gap between Abingdon and Radley they would not have proposed this combined site for around 800 houses? This would be urban sprawl in the Green Belt, clearly contrary to the planning advice in NPPF 2012 and certainly would be contrary to the advice that the Green Belt should *'assist in safeguarding the countryside from encroachment'* (Para 80

¹⁵ www.cpre.org.uk/resources/housing-and-planning/green-belts/item/1956-green-belts-a-greener-future

of the NPPF 2012). The Vale appear to disregard Green Belt policies completely with very tenuous justification. We do not believe a case for an 'exceptional circumstance' has been made.

- 4.37 Additionally as local residents, we do not agree with the Council's conclusions or the Green Belt review and consider that demonstrable harm would be caused by developing this elevated prominent site, not only from a Green Belt point of view but also because of the proximity of Blake's Oak Ancient Woodland, and the very serious traffic and environmental implications. Some of these concerns, including the traffic implications and air quality, will be addressed in separate submissions from NALPG.

Preserving the General Setting and Special Character of Abingdon-on-Thames

- 4.38 One of the five purposes of the Green Belt over the years and specifically mentioned in Paragraph 80 of NPPF is '*to preserve the setting and special character of historic towns*' and this is particularly pertinent to this prominent site on the northern edge of Abingdon. Abingdon is an attractive historic town adjacent to the Thames and many of us feel proud to live here.
- 4.39 Abingdon has a strong claim to be the longest inhabited town in the country and archaeology indicates that people have been living in central Abingdon since at least the early Iron Age. To allow development on this large prominent site on the northern edge of Abingdon, on substantially higher ground than surrounding existing residential development, would undoubtedly affect the setting and special character of Abingdon.
- 4.40 This would include not only the physical development and the setting itself in open countryside, but also the traffic generated. This increased traffic would have an immense impact on the narrow historic streets, many Listed buildings and the narrow river crossing which contribute to Abingdon's historic character. The traffic implications are covered in a separate submission by the NALPG.
- 4.41 A further concern in allowing the site to be developed is the slope of the land, rising towards the north and the physical prominence of any development. Any new development would be very visible from North Abingdon and beyond. This would include other parts of the Oxford Green Belt. A previous Planning Inspector referred to the landscape rim to the north of the town and concluded that this important area should be protected and not developed. The Landscape considerations included in the text in the Local Plan seek to retain the existing trees and hedgerows and the planting of additional trees. However The Green Belt Review Part 2 specifically states in paragraph 4.2:

Mitigation

'It may be argued that any adverse impact of removing land from the Green Belt (leading to development on that land) can be mitigated by appropriate landscape measures. The potential to provide landscape mitigation and/or Green Infrastructure should not be regarded as justification for development in the Green Belt or for the

exclusion of land from the Green Belt. The key consideration is to what extent the land in its current state meets the purposes of the Green Belt, is open in character and contributes to the wider openness of the Green Belt.

- 4.42 We do not believe that the enormous physical impact of the proposed housing on a prominent site physically sited on rising land above other housing on Long Furlong and Peachcroft, can be sufficiently mitigated by landscape measures. We also contend that the land in its current state has an important contribution to the Green Belt for the reasons set out in this document.
- 4.43 It is said that the proposed development should be limited to the lower slopes of Lodge Hill (see Appendix 1, under the heading of Landscape Considerations). There is an Ordnance Survey rivet benchmark on the milestone on the top of Lodge Hill (GR SU50689992) with a height of 88.678m above ODN¹⁶. The ground slopes away to the south, southeast and southwest. There is a cut mark benchmark on 184, Oxford Road (GR SU50439901 with height 64.514m ODN). Peach Croft Farm lies between the 60m and 65m contours. The 65m contour crosses Dunmore Road slightly east of Tilsley Park. The highest part of the site to the West of the Oxford Road can be seen to lie between the 75m and 80m contours and is estimated to be between 78m and 79m¹⁷. Thus the highest part of the site is about 10m below the top of Lodge Hill, whereas the surrounding ground on the edge of the site is typically about 25m below the top of Lodge Hill. The prominence of Lodge Hill is demonstrated by the fact that the Ordnance Survey had a triangulation station at GR SU5030799727 (named Pen Barn – a Buried Block)¹⁸ near the top of Lodge Hill. The elevated nature of the edge of the site can be seen in Photograph 4 in Appendix 10.
- 4.44 A significant problem associated with the rising land and soil type is the substantial flooding that occurs most years on lower parts of the site to the east of the A4183 and along parts of Twelve Acre Drive, adjacent to the stream. The water lies in the fields and regularly floods the road. This is clearly seen from Photographs 1 and 2 taken from Barfleur Close on Peachcroft in 2008 which is attached in Appendix 10 and we can supply further photographic evidence if required. Although this is particularly problematic in this part of the site, there is also a problem of standing water in areas of the western part of the site as can be clearly seen in a Photograph 3 taken on Wednesday 26th November 2014 also attached in Appendix 10.

Safeguarding the Countryside from Encroachment

- 4.45 The land is currently farmed and the land is widely appreciated by local residents for its open aspect, a key feature specifically mentioned for preserving Green Belts, and also for recreational purposes including the footpaths across the fields, wildlife and

¹⁶ Details of OS benchmarks can be found at <http://www.ordnancesurvey.co.uk/benchmarks/> by entering the kilometre grid square.

¹⁷ Contours taken from OS Explorer Map No. 170.

¹⁸ Details of OS triangulation stations can be found at <http://www.ordnancesurvey.co.uk/gps/legacy-control-information/triangulation-stations>

trees. This is in addition to Tilsley Park, a sports centre and the adjoining recreational areas to the immediate west of the site. As an example, skylarks, a seriously threatened species, can be seen and heard above the proposed housing sites. On a personal level, I have lived in Alexander Close on the Long Furlong estate since 1988, moving from Peachcroft where I had lived since 1985. Our house on Long Furlong was one of the first to be built and we could hear and see the skylarks directly above the open fields behind our house, but as these open fields were developed with housing on Long Furlong, the skylarks moved further north to the proposed housing site, the subject of this submission.

- 4.46 Peach Croft Farm provides free range turkeys and geese which are quartered on part of the proposed site at certain times of the year, and enjoyed by local residents at other times! The tenanted farm has been run by the same family for 75 years. The introduction of a large housing estate right up to the western boundary of Peach Croft Farm will undoubtedly have a significant adverse effect on the farm itself. In addition to obvious effects that such a large housing site would pose, such as loss of valuable farmland, there will be other less obvious effects that might not be considered at the time of the Local Plan Inquiry. For instance, in a housing development of this size, it is likely that there will be a significant number of domestic cats living in the new housing and these could have a disastrous effect on the many free range geese and turkeys that roam on the open fields of Peach Croft Farm.
- 4.47 The Government states that one of the five purposes of the Green Belt is **‘to assist in safeguarding the countryside from encroachment’**. Developing these two sites would undoubtedly result in significant encroachment on a valuable and prominent site in open countryside.
- 4.48 We have consulted Natural England concerning the Agricultural Land Classification (ALC) surveys undertaken by the former Ministry of Agriculture Fisheries and Food until the late 1990’s. We received a detailed reply on 2nd December 2014 which is included in Appendix 9. The letter confirmed that no detailed Post 1988 ALC survey was undertaken which included the housing site. However Natural England have checked the Provisional ALC grade and confirmed *‘that the fields appears to comprise of Grade 3 (and possibly a small area of Grade 2).’* We understand that this Provisional data is only an indication of the ALC grade but we firmly believe that a detailed soil survey should have been undertaken, prior to proposing housing on the site, to establish whether the land is Best and Most Versatile. In the Sustainability Assessment Report of the Local Plan¹⁹ the consultants suggest that the split is approximately 10% Grade 2 and 90% Grade 3 Agricultural Land Classification. The consultants agree that depending on the split between 3a and 3b grade of land, with

¹⁹ SA Report Appendix 4 – available from http://www.whitehorsedc.gov.uk/sites/default/files/10_07_14_SA%20Report%20Appendices%20FINAL%20v1.pdf

3a being classified as Best and Most Versatile, developing this site could result in the loss of Best and Most Versatile Land.

- 4.49 However, in the same document on Page 124, the Consultants state that the site is within 400m of the Thames but this is clearly not the case. Neither do we understand their statement on Page 127 that the site is located less than 25m from a Scheduled Ancient Monument at Radley Road/ Thrupp Lane.
- 4.50 The Vale of White Horse Council has not provided a Five Year Housing supply and has made itself vulnerable to speculative housing sites, won on appeal, for example the site for 160 houses on land off Drayton Road, Abingdon.(Planning application P12/v2266/FUL). We believe the Council is proposing this late additional site to the east of the A4183 as a hasty and ill-conceived measure. Additionally many of the residents of North Abingdon cannot help but wonder if there is a link between the removal of the Radley (north) site for 200 houses and the removal of the Cumnor South site for 200 houses and the very recent inclusion of the part of the site to the east of the A4183 for around 390 houses.
- 4.51 The Council acknowledges in the Draft Local Plan that in the Government's document NPPG 2012 it states that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the '*very special circumstances*' justifying inappropriate development on a site within the Green Belt. (Local Plan 2031 Part 1 Strategic Sites and Policies Topic Paper 9 para 2.5). This is again confirmed in the advice from Eric Pickles in October 2014. We do not consider that the Council has made a sufficiently robust case to justify the '*very special circumstances*' required to release this land for housing for the reasons in this submission.

5. Summary Arguments

The following Table summarises why we believe development of the North Abingdon site is not consistent with the purposes of preserving the Green Belt.

Green Belt Purpose	Assessment of the Contribution of the Site to Meeting Green Belt Purpose
To check the unrestricted sprawl of large built-up areas	<p>This purpose is relevant to the current site. The Vale Green Belt Review asserts it is not applicable. However, the Informal Assessment by Oxford City Council correctly acknowledges its relevance.</p> <p>Dunmore Road and Twelve Acre Drive are parts of the Abingdon Peripheral Road, and provide a natural edge to urban Abingdon.</p> <p>This site makes a High Contribution to this Green Belt purpose.</p>
To prevent neighbouring towns merging into one another	<p>The site to the East of the Oxford Road is an important part of the barrier between Abingdon and Radley. The Vale Council is proposing to release Green Belt on two sites, one to the North West of Peach Croft Farm and additionally to the South and East of Whites Lane, Radley. This would compromise the remaining gap (as stated in the Informal Assessment for Oxford City Council).</p> <p>The site to the West of the Oxford Road forms part of the barrier between Abingdon and Sunningwell.</p> <p>This site makes a High Contribution to this Green Belt purpose.</p>
To assist in safeguarding the countryside from encroachment	<p>The site provides a pleasant rural area on the edge of Abingdon. There is no urban usage in the area; the presence of Tilsley Park to the West of the site is consistent with using the Green Belt for recreation.</p> <p>The site is currently Grade 2 and 3 farmland bounded in one place by Ancient Woodland (Blake's Oak).</p> <p>This site makes a High Contribution to this Green Belt purpose.</p>
To preserve the setting and special character of historic towns	<p>Abingdon has a strong claim to be the longest inhabited town in the country, and so this purpose is relevant. It has three Conservation Areas. Lodge Hill provides the natural rim on the northern side of Abingdon. The Vale argues that they are only releasing the lower slopes, but the highest part of the development is within 10m elevation of the top of Lodge Hill. From the site, it is possible to see a wide range of Abingdon-on-Thames. Thus the pleasantly rural northerly view of farm and ancient woodland, presently available from many locations in Abingdon, would be replaced by a view of housing.</p> <p>This site makes a High Contribution to this Green Belt purpose.</p>
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<p>This site comprises Grades 2 and 3 farmland. Releasing it from the Green Belt runs counter to the desire to recycle derelict and other urban land.</p>

6. Conclusions

- 6.1 The Council has not demonstrated the 'exceptional need' required for releasing the site from the Oxford Green Belt. In the hurry to identify sufficient housing land it has overridden Government advice, including previous Planning Inspectors decisions, its own previously tested planning policies, the advice of national organisations such as the CPRE, and strong and substantiated local concern. Additionally, the late inclusion of part of the site to the east of the A4183 (Oxford Road), contrary to its consultants advice, confirms the strongly held belief that this is a desperate manoeuvre by the Council to fulfil its housing requirement.
- 6.2 NALPG believes this site should not be released from the Green Belt for the many reasons given in this submission. This would threaten the integrity and essential purpose of the Oxford Green Belt.

APPENDICES

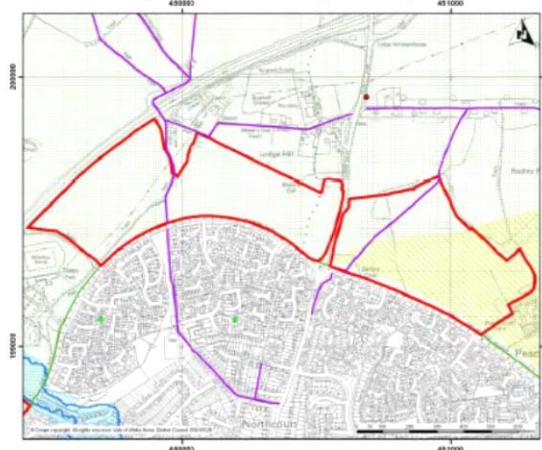
- 1. Map of the North Abingdon-on-Thames Site (53.82 ha) and Infrastructure requirements included in the Appendices of The Draft Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies. (Pages 9-11)**
- 2. National Planning Policy Framework 2012, Policy 9 'Protecting Green Belt land' (Pages 19 to 21)**
- 3. 'Councils must protect our precious green belt' Government Press release 6th October 2014**
- 4. Core Policy 13 'The Oxford Green Belt' of the Draft Vale of White Horse Local Plan 2031**
- 5. Vale of White Horse District Council Green Belt Review Final Phase 2 Report Review February 2014 Figure 1: Study Area showing Land Parcels 1 to 13 and Settlements**
- 6. Land Parcel 8: Foxborough Hill and Radley Wood, The Vale of White Horse Green Belt Review Final Phase 2 Report**
- 7. Vale of White Horse District Council Local Plan 2031 Draft Adopted Policies Map, November 2014**
- 8. Land Parcel 9: Shippon and the airfield. The Vale of White Horse Green Belt Review Phase 2 Report**
- 9. Consultation reply dated 2nd November 2014 from Natural England**
- 10. Photographs taken from Barfleur Close, Peachcroft and the Public footpath close to Dunmore Road on the site to the west of the A4183 Road**

Appendix 1 Map of the North Abingdon-on-Thames Site (53.82 ha) and Infrastructure requirements included in the Appendices of The Draft Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies. (Pages 9-11)

3. Abingdon-on-Thames and Oxford Fringe Sub-Area

In addition to the general requirements set out in section two, development will be required to meet the following infrastructure requirements.

North of Abingdon-on-Thames (53.82 ha)



Use: Around 800 homes, subject to detailed masterplanning.

Key objectives:

- To deliver a high quality, sustainable urban extension to Abingdon-on-Thames integrated with Abingdon-on-Thames so residents can access existing facilities in the town.

Urban design principles:

- Prepare a Green Infrastructure (GI) strategy for the entirety of the site to set the framework for development. Development should:
 - contribute to GI provision around the northern edge of Abingdon-on-Thames linking to Radley Park and the Sports Centre;
 - create a substantive GI corridor linking the Sports Centre Grounds to Lodge Hill along the line of the stream; and
 - enhance GI between the site and Lodge Hill.
- Development should include links from the east to the west of the site, from the site to the ring road and beyond into the development to the south of the ring road. A pedestrian crossing will need to be provided along this route to connect development sites to the north and south of the ring road. This will need to be undertaken in consultation with Oxfordshire County Council.
- Adopt a permeable, perimeter block layout within the site to optimise connectivity within and beyond the site.
- Create a sense of place around the River Stort, e.g. by providing a linear walkway whilst taking advantage of any existing paths and public rights of way.
- Houses will need to front onto the ring road but the treatment of the area between the ring road and the housing line will need to be carefully considered. Create an attractive area at this location along the ring road with particular consideration being given to soft and hard landscaping for the benefit of both pedestrians and cyclists.
- Affordable housing should be evenly distributed across the site and should not be used as a buffer between less desirable areas of the site (e.g. A34) and market housing.

9

3. Abingdon-on-Thames and Oxford Fringe Sub-Area

In addition to the general requirements set out in section two, development will be required to meet the following infrastructure requirements.

Utilities:

- Overhead power lines traversing the western part of the western portion of the site will need to be considered as part of an overall masterplan for this site.
- Upgrade the sewer network.

Access and highways:

- Contribute towards delivery of south facing slips on A34 at Lodge Hill.
- Access for the western portion of the site to be provided off Dunmore Road (not Oxford Road). Implications of access arrangements on residential road junctions and potential congestion along Dunmore Road will need to be investigated. Junction improvements at Dunmore Road/A4183 may be required.
- Access arrangements for the eastern portion of the site will need to be investigated.
- Contribute towards future strategic infrastructure improvements to Abingdon-on-Thames and any necessary mitigation measures identified through the site Transport Assessment.
- Layout of site should be mindful of future expansion of the A34 and should not preclude this.
- Improve or make financial contributions towards improved bus services (e.g. bus stops, pedestrian crossing, shelters and real time information displays) in Abingdon-on-Thames, including on the A4183 to the north of Peachcroft Roundabout, along Copenhagen Drive and Dunmore Road, as appropriate.
- Contribute towards additional buses from north Abingdon-on-Thames towards Didcot and other Science Vale destinations to reduce the number of car journeys in this direction at peak times.

- Include appropriate provision for pedestrians to cross Dunmore Road and Twelve Acre Drive.

Social and community:

- A new 'one and a half form entry' primary school will be required on the site. This should be on a 2.22 ha site to allow for future growth.
- Contribute towards expanding secondary school capacity in Abingdon.
- Police presence will need to be provided on site either through a neighbourhood office or as part of a community hub.

Environmental health:

- Investigate potential noise and air pollution impacts from the A34, A4183, Dunmore Road & Twelve Acre drive and mitigate (if required) to offset any adverse impacts.
- Consider potential impact on Abingdon-on-Thames Air Quality Management Area (AQMA) and mitigate (if necessary).

Landscape considerations:

- Limit development to those parts of the site identified in the Landscape Capacity Study (2014) and east of Oxford Road Landscape and Visual Impact Assessment (LVIA) as being suitable for development.
- Retain existing trees and hedgerows.
- Plant additional trees along the A34, the ring road and along Twelve Acre Drive.
- Further woodland planting south of Lodge Hill.
- Limit development to the lower slopes of Lodge Hill.
- Consider potential impacts on the North Vale Corallian Ridge.
- Design of the development should include appropriate landscape mitigation measures to minimise the visual impact

10

3. Abingdon-on-Thames and Oxford Fringe Sub-Area

In addition to the general requirements set out in section two, development will be required to meet the following infrastructure requirements.

of the development on the Green Belt.

Biodiversity and green infrastructure:

- Incorporate an appropriate buffer along either side of the River Stort into the overall development.

Flood risk and drainage:

- Mitigate any detrimental impact on groundwater quality (if required).

Appendix 2 National Planning Policy Framework 2012, Policy 9 'Protecting Green Belt land' (Pages 19 to 21)

Achieving sustainable development | 19

78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.

9. Protecting Green Belt land

79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
80. Green Belt serves five purposes:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
82. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:
- demonstrate why normal planning and development management policies would not be adequate;
 - set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - show what the consequences of the proposal would be for sustainable development;
 - demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
 - show how the Green Belt would meet the other objectives of the Framework.
83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green

Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.
85. When defining boundaries, local planning authorities should:
 - ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
 - not include land which it is unnecessary to keep permanently open;
 - where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
 - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
 - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
86. If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.
87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
88. 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.
89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:
 - buildings for agriculture and forestry;

- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
 - the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
 - limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:
- mineral extraction;
 - engineering operations;
 - local transport infrastructure which can demonstrate a requirement for a Green Belt location;
 - the re-use of buildings provided that the buildings are of permanent and substantial construction; and
 - development brought forward under a Community Right to Build Order.
91. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.
92. Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts.

10. Meeting the challenge of climate change, flooding and coastal change

93. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable

Appendix 3 'Councils must protect our precious green belt' Government Press release 6th October 2014

From <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>



Press release Councils must protect our precious green belt land

From: Department for Communities and Local Government (<https://www.gov.uk/government/organisations/department-for-communities-and-local-government>), Brandon Lewis MP (<https://www.gov.uk/government/people/brandon-lewis>) and The Rt Hon Eric Pickles MP (<https://www.gov.uk/government/people/eric-pickles>)

First published: 4 October 2014

Last updated: 6 October 2014, see all updates (<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land#history>)

Part of: Improving the energy efficiency of buildings and using planning to protect the environment (<https://www.gov.uk/government/policies/improving-the-energy-efficiency-of-buildings-and-using-planning-to-protect-the-environment>), Climate change (<https://www.gov.uk/government/topics/climate-change>), Environment (<https://www.gov.uk/government/topics/environment>) and Planning and building (<https://www.gov.uk/government/topics/planning-and-building>)

Ministers have underlined the government's commitment to protect the green belt from development.



Communities Secretary Eric Pickles and Housing and Planning Minister Brandon Lewis said that thousands of brownfield sites are available for development, and should be prioritised.

New guidance (http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_044), published on Monday 6 October, reaffirms how councils should use their Local Plan (<https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans>), drawing on protections in the National Planning Policy Framework (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>), to safeguard their local area against urban sprawl,

and protect the green lungs around towns and cities.

The guidance explains that, once established, green belt boundaries should only be altered in exceptional cases, through the preparation or review of the Local Plan.

It also states that housing need – including for traveller sites – does not justify the harm done to the green belt by inappropriate development.

Today's (4 October 2014) measures will reinforce the action taken by the government since 2010 to protect the green belt. This includes:

- abolishing the previous administration's top-down regional strategies
- selling surplus brownfield land for redevelopment
- introducing more flexible planning rights so empty and underused buildings can be brought back into productive use

Local Plans are now at the heart of the reformed, democratic planning system, so councils can decide where development should and shouldn't go in consultation with local people.

Eric Pickles said:

" This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development.

Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area."

Brandon Lewis said:

" We have put Local Plans at the heart of the reformed, planning system, so councils and local people can now decide where development should and shouldn't go.

Support for new housing is growing, because communities welcome development if it is built in the right place and does not ignore their needs. That's why 230,000 planning permissions were granted by councils in the last year alone, while the most recent official statistics show that green belt development is at its lowest rate since modern records began in 1989."

Councils should consider how they will protect and preserve important sites in their area, especially green belt sites. Other considerations include:

- sites of special scientific interest
- areas of outstanding natural beauty
- heritage coastline
- national parks and the Broads

Further information

The guidance (http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_044) published on Monday 6 October includes the following questions:

Do housing and economic needs override constraints on the use of land, such as green belt?

The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated

Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

Office address and general enquiries

2 Marsham Street
London
SW1P 4DF

Contact form <http://forms.communities.gov.uk>

General enquiries: please use this number if you are a member of the public 030 3444 0000

Media enquiries

Email communications-newsdesk@communities.gsi.gov.uk

Please use this number if you're a journalist wishing to speak to Press Office 030 3444 1201

Share this page

- Share on Facebook (<https://www.facebook.com/sharer/sharer.php?u=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fnews%2Fcouncils-must-protect-our-precious-green-belt-land>)
- Share on Twitter (<https://twitter.com/share?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fnews%2Fcouncils-must-protect-our-precious-green-belt-land&text=Councils%20must%20protect%20our%20precious%20green%20belt%20land>)

Appendix 4 Core Policy 13 'The Oxford Green Belt' of the Draft Vale of White Horse Local Plan 2031

5 Sub-Area Strategies

Abingdon-on-Thames and Oxford Fringe



Protecting the environment and responding to climate change

The Oxford Green Belt

5.39. The purpose of the Oxford Green Belt in the Vale of White Horse District is to prevent urban sprawl around Oxford by keeping the land permanently open, and to preserve the rural setting and special character of the city of Oxford.

5.40. A local Green Belt Review⁶¹ has been completed that assessed land around settlements in the Vale against the five purposes of the Green Belt as set out in national policy⁶². This review demonstrated that parcels of land, which no longer meet the purposes of the Green Belt, could be released around these settlements. The Green Belt within the Vale of White Horse District is shown by the Adopted Policies Map.

5.41. The local Green Belt Review undertaken does not preclude, and would inform a future Green Belt Review, should this be needed, to contribute to meeting any identified unmet housing need within the Oxfordshire Housing Market Area. This matter is addressed by Core Policy 2: Cooperation on unmet housing need for Oxfordshire (Chapter 1).

5.42. Some of the sites identified as strategic allocations within this plan have been historically located within the Oxford Green Belt. We have considered the impact of allocating these sites carefully and this has been informed by the local Green Belt Review. The sites all fall within land that has been identified through the local Green Belt Review to no longer meet the purposes of the Green Belt. For this reason, the development of these sites will not harm the purposes of the Oxford Green Belt, which will continue to be protected in accordance with Core Policy 13.

⁶¹ Kirkham Landscape Planning Ltd/Terra Firma Consultancy (2014) Vale of White Horse District Council Green Belt Review, available at: <http://www.whitehorsedc.gov.uk/evidence>
⁶² CLG (2012) National Planning Policy Framework (NPPF), para 80

62

Vale of White Horse District Council

5 Sub-Area Strategies

Abingdon-on-Thames and Oxford Fringe



Core Policy 13: The Oxford Green Belt

The Oxford Green Belt area in the Vale, as amended following local Green Belt Review, will continue to be protected to maintain its openness and permanence.

Development will be permitted in the following settlements, which are inset to the Green Belt (as shown on the Adopted Policies Map), where the proposed development is within the existing built area of the village and in accordance with Core Policies 3 and 4:

- Appleton
- Botley
- Cumnor
- Farmoor
- Kennington
- Radley and
- Wootton

Proposals for inappropriate development will not be approved except in very special circumstances*.

The construction of new buildings in the Green Belt is considered inappropriate except where they are:

- i. buildings for agriculture or forestry

- ii. provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it
- iii. the extension or alteration of a building provided it does not result in disproportionate additions over and above the size of the original building
- iv. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces
- v. limited infilling in Shippon, South Hinksey, Wootton Old Village and Wytham
- vi. limited affordable housing for local community needs as set out in Core Policy 24, or
- vii. limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

The following forms of development are also not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt:

- mineral extraction
- engineering operations
- local transport infrastructure that can demonstrate a requirement for a Green Belt location
- the re-use of buildings, provided that they are permanent and of substantial construction, and
- development brought forward under a Community Right to Build Order.

* 'Very special circumstances' will not exist unless the potential harm, is clearly outweighed by other considerations (NPPF, Paragraph 88).

Appendix 5 Vale of White Horse District Council Green Belt Review Final Phase 2 Report Review February 2014 Figure 1: Study Area showing Land Parcels 1 to 13 and Settlements

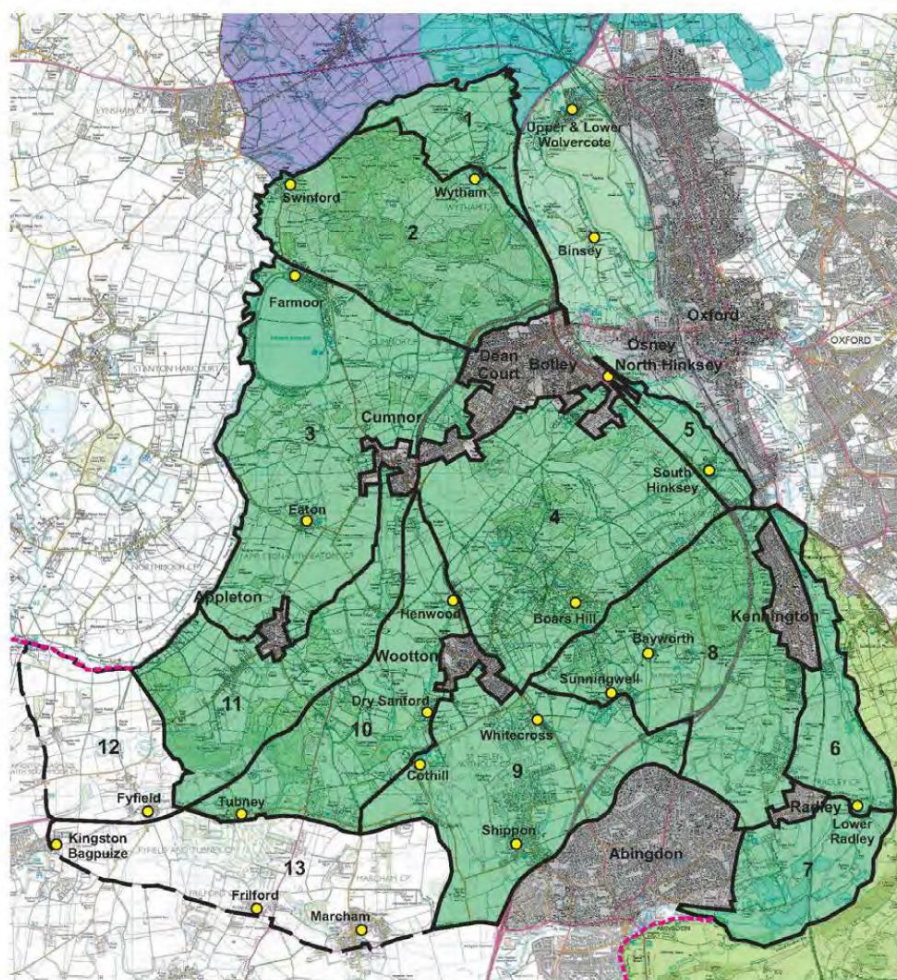
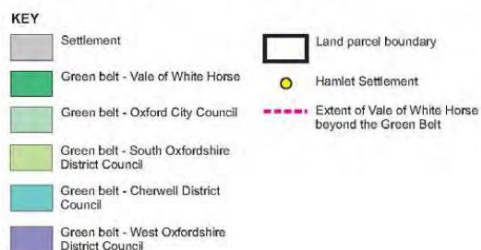
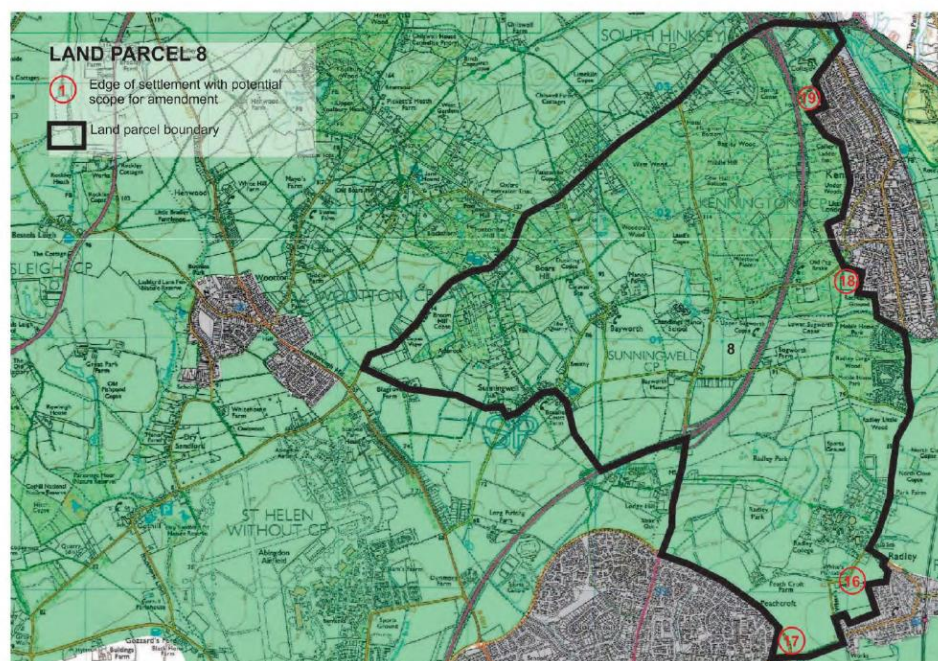


Figure 1: Vale of White Horse Oxford Green Belt Review Study Area showing Land Parcels 1 to 13 and Settlements



Appendix 6 Land Parcel 8: Foxborough Hill and Radley Wood, The Vale of White Horse Green Belt Review Final Phase 2 Report

P8: Foxborough Hill and Radley Wood



A. Settlement edge of Radley: Radley College

Description	The northern settlement edge comprises the buildings and grounds of Radley College set in the remains of parkland which extends westwards into the land parcel. To the south the settlement edge includes medium and large fields which extend to the west. The settlement edge is heavily influenced by the adjoining village.
To check the unrestricted sprawl of Oxford	N/A
To prevent neighbouring towns (Oxford, Abingdon, Appleton, Botley, Cumnor, Kennington, Radley and Wootton) merging into each other	The settlement edge of Radley in general is important in maintaining the separation of Radley and Abingdon but the Radley edge east of White's Lane is already compromised by the exposed village built form.
To assist in safeguarding the countryside from encroachment	West of White Lane the settlement edge is part of the swathe of countryside that extends north-west up to Lodge Hill. The areas east of the lane are contained by the built form and make a lesser contribution to safeguarding the countryside
To preserve the setting and special character of historic Oxford	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Opportunities for use of derelict or urban land are few in Radley

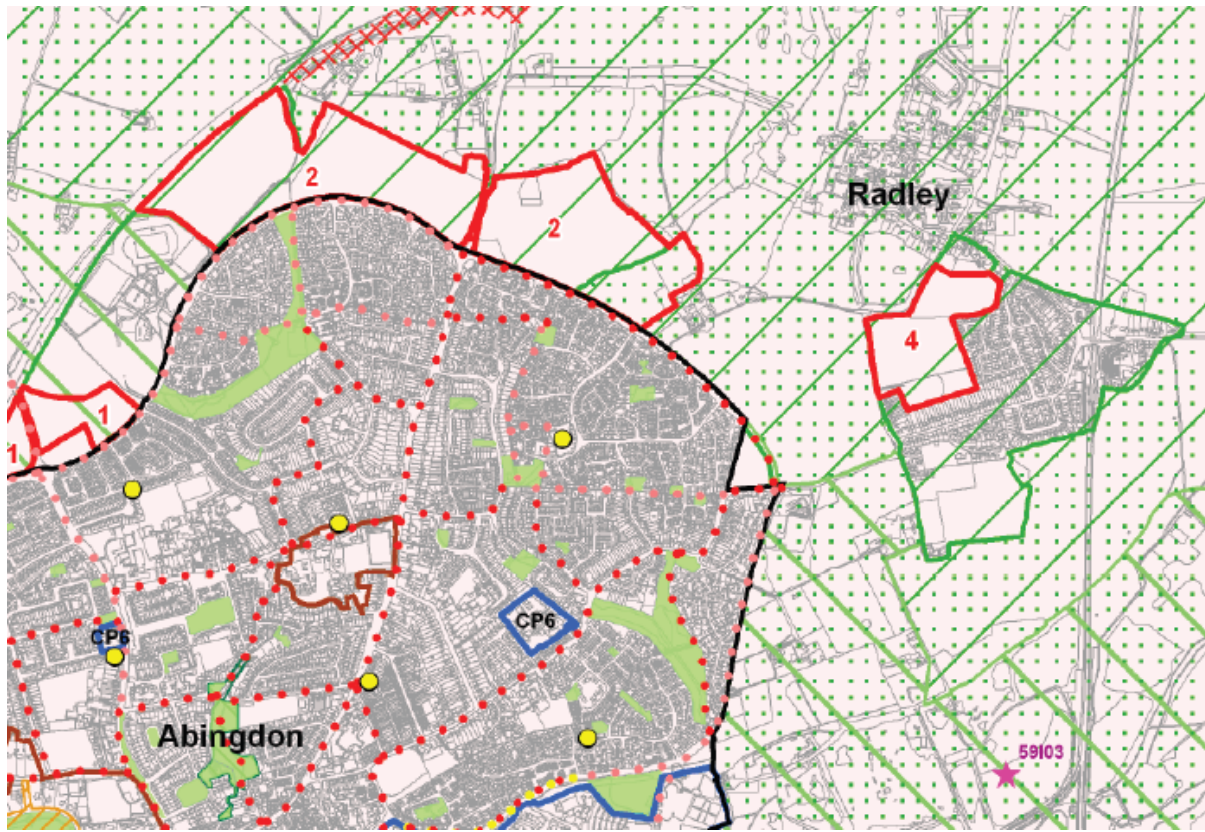
B. Settlement edge of Abingdon: Radley Park

Description	The landscape north of the perimeter road is a mix of open fields and remnants of the historic parkland at Radley Park. Peachcroft Farm is used for rearing turkeys and geese and horticulture, with a small farm shop and farm buildings.
To check the unrestricted sprawl of Oxford	N/A
To prevent neighbouring towns (Oxford, Abingdon, Appleton, Botley, Cumnor, Kennington, Radley and Wootton) merging into each other	This open landscape with long views is important in maintaining the separation of Abingdon from Radley. The openness of the area is important to the physical and visual containment of Abingdon
To assist in safeguarding the countryside from encroachment	The settlement edge is very much a part of the wider landscape which extends along the northern edge of Abingdon up to Lodge Hill. The perimeter road provides a clear change from built form to extensive open countryside. The small triangular open area next inside the perimeter road is heavily influenced by the adjoining built form
To preserve the setting and special character of historic Oxford	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	The pressure for housing expansion at Abingdon means that the protection of this valued part of the Green Belt plays an important role in maintaining the need to encourage the use of land of a lesser environmental quality in the town.

C. Settlement edge of Kennington: Radley Large Wood

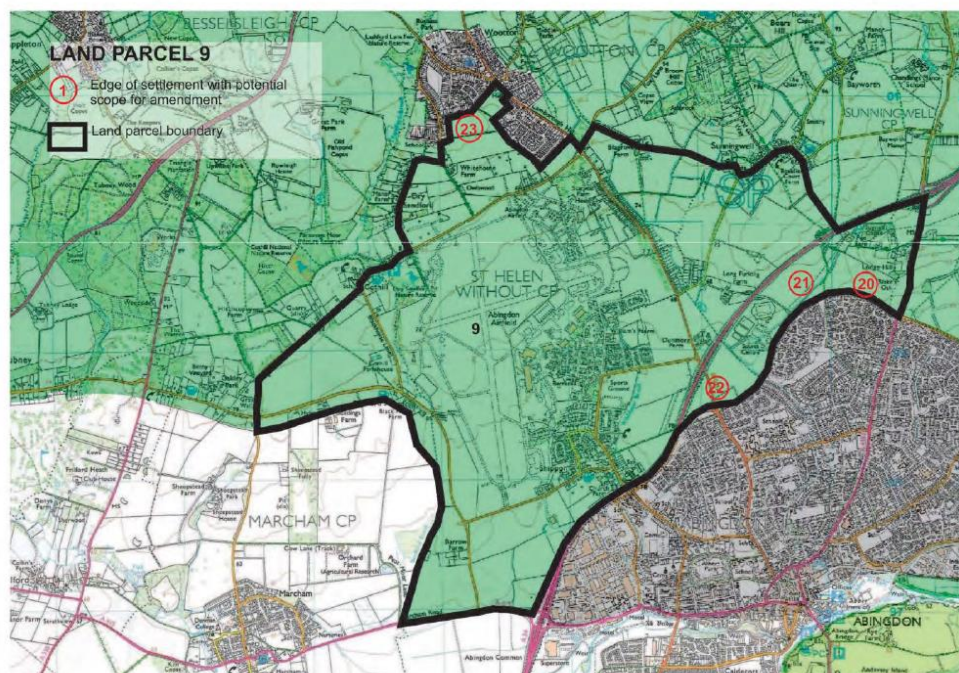
Description	The settlement edge is heavily wooded covering the lower slopes of Foxborough Hill. A few small open fields, two of which are in use as recreation grounds, lie between the woodland and the settlement edge
To check the unrestricted sprawl of Oxford	The proximity of Oxford to the east of Kennington means that the settlement edge even on the west side of the village makes an important contribution to the perception that Oxford has not spilled over west of the river at this point.
To prevent neighbouring towns (Oxford, Abingdon, Appleton, Botley, Cumnor, Kennington, Radley and Wootton) merging into each other	The western edge is so well contained by woodland that it makes little contribution to the separation of Kennington and Wootton or Abingdon
To assist in safeguarding the countryside from encroachment	The wooded edge is part of a wider swathe within the open countryside and vulnerable to erosion. The small open areas next to Kennington are heavily influenced by the adjoining built form
To preserve the setting and special character of historic Oxford	The wooded hillsides to the west of Oxford and an important part of its historic setting.
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 Kennington

**Appendix 7 Vale of White Horse District Council Local Plan 2031 Draft Adopted Policies
Map November 2014**



Appendix 8 Land Parcel 9: Shippon and the airfield. The Vale of White Horse green belt review Phase 2 Report

P9: Shippon and the airfield



A. Settlement edge of Wootton: Whitehouse Farm

Description	The settlement edge is a series of small fields under pasture, divided by tree cover and distinctive hedgerows (bare at ground level).
To check the unrestricted sprawl of Oxford	N/A
To prevent neighbouring towns (Oxford, Abingdon, Appleton, Botley, Cumnor, Kennington, Radley and Wootton) merging into each other	Settlement within Shippon and Whitecross has eroded the perception of open countryside between Wootton and Abingdon so that the rural settlement edge is important in maintaining the separation of Wootton and Abingdon. However where the edge is enclosed by the built form, this is less important.
To assist in safeguarding the countryside from encroachment	The settlement edge contrasts with the landscape of the Airfield south of Honeycroft Lane. It includes the best of the open countryside between the settlements.
To preserve the setting and special character of historic Oxford	N/A
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

B. Settlement edge of Abingdon: North of Wildmoor

Description	This is an extensive settlement edge heavily influenced by the A34 and the urban edge of Abingdon, although less so in the south, where the A34 contains the town. The edge is a pattern of medium sized fields with recreational uses on the edge of Abingdon and Shippon. Lines of trees follow the road network
To check the unrestricted sprawl of Oxford	N/A
To prevent neighbouring towns (Oxford, Abingdon, Appleton, Botley, Cumnor, Kennington, Radley and Wootton) merging into each other	The settlement at Shippon and Whitecross has eroded the perception of open countryside between Wootton and Abingdon so that the settlement edge west of the A34 is more important in maintaining the separation of Abingdon from Wootton. However east of the A34 the settlement edge is heavily influenced by modern urban uses and contained by the elevated A34 thus having a much lesser contribution to the sense of separation
To assist in safeguarding the countryside from encroachment	West of the A34, the edge is part of the wider countryside which wraps around Shippon and the Airfield. East of the A34 the land makes little contribution to the perception of open countryside
To preserve the setting and special character of historic Oxford	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	The pressure for housing expansion at Abingdon means that the protection of this valued part of the Green Belt plays an important role in maintaining the need to encourage the use of land of a lesser environmental quality in the town.

Appendix 9 Consultation reply dated 2nd November 2014 from Natural England

Dear Ms Lever

Thank you for your recent enquiry requesting Agricultural Land Classification (ALC) survey information for the parcels of land located in the Oxford Green Belt within the North of Abingdon-on-Thames Site.

Natural England only holds copies of detailed individual Agricultural Land Classification (ALC) surveys carried out by the former Ministry of Agriculture, Fisheries and Food until the late 1990s. These surveys were undertaken largely in response to requests from Local Planning Authorities for individual sites or areas at the urban edge which were to be considered for development. There is no longer a national programme to survey all areas in detail, and since the late the 1990's, the Government has withdrawn from undertaking detailed field surveys itself.

Since the Government has withdrawn from undertaking detailed field surveys itself since the late 1990s, consultants are engaged by developers to carry out detailed Agricultural Land Classification surveys at the request of Local Planning Authorities. The Institute of Professional Soil Scientists maintains a register of competent soil surveyors who have experience of carrying out ALC surveys (www.soils.org.uk). The Post 1988 information is the most recent information available in the public domain (private consultants may have carried out additional surveys but this is not publically available for commercial reasons).

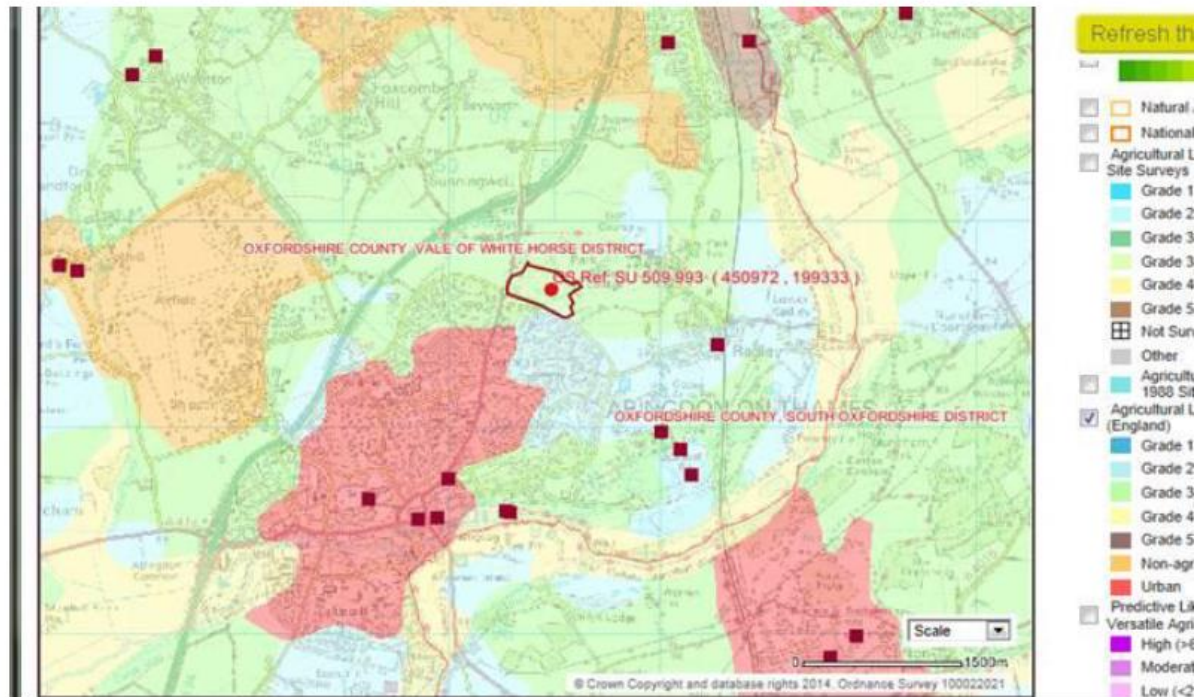
Post 1988 ALC maps:

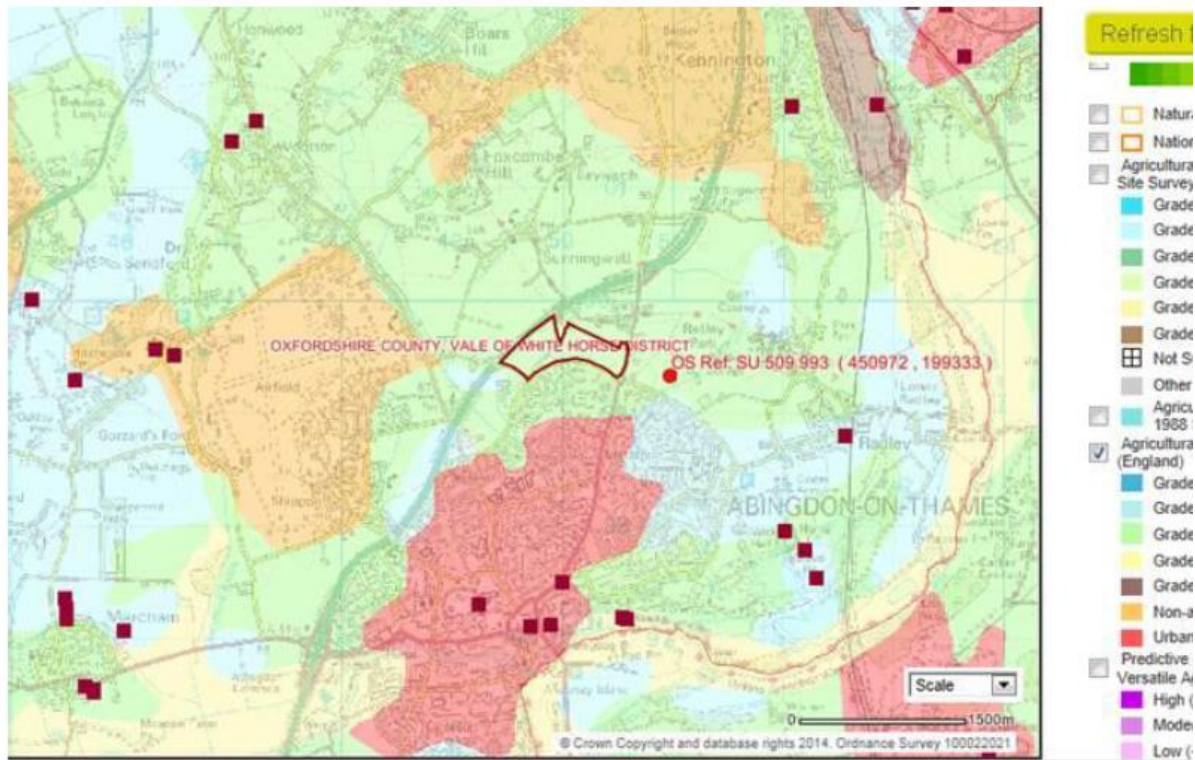
As you may be aware, the more recent detailed surveys were undertaken from October 1988 to late 1999. The surveys were undertaken according to current guidelines for ALC grading (MAFF, 1988) and represent the most definitive source of ALC data that Natural England hold. These Post 1988 maps show all six grades (the subdivision of Grade 3 into 3a and 3b occurred after 1976). I have checked the parcel of land outlined in red on the map you submitted to see if any detailed ALC surveys have been carried out on your area of interest and I can confirm that none were available.

Provisional ALC data:

The published 1:250,000 series of the Provisional Agricultural Land Classification map is an alternative source of ALC information for areas of land which have not been subject to detailed 'Post 1988' surveys. The original strategic scale Provisional Series of ALC surveys were undertaken between 1966-1974, and cover the whole of England and Wales. Because of variations in the amount of basic information available for different parts of the country, there was some variation in the exactitude of the surveys, thus the maps were labelled as 'Provisional' with the intension that they would be revised in the future. This was never carried out. These maps do, however, remain valid.

Provisional data does not show the breakdown of Grade 3 into Sub grades 3a and 3b, and it has a minimum map unit of 80 hectares (which means that areas of less than 80 hectares may not be separately mapped). Consequently, it is not suitable for site specific assessments, for which a more detailed field survey may be needed. I have checked the provisional ALC grade for your area of interest (see the map below) and can confirm that the fields appears to comprise of **Grade 3 (and possibly a small area of Grade 2)** land, however, as explained above, Provisional data is only designed to give an indication of the ALC grade (and further survey effort is required to establish whether the land is Best and Most Versatile).





Best and Most Versatile Land:

Best and Most Versatile (BMV) agricultural land is land with an ALC grade of 1, 2 and 3a. This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses. Generally speaking, retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.

Government policy for England with regard to BMV is set out in the National Planning Policy Framework (NPPF) published in March 2012 (paragraph 112): *'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'.*

Natural England is the Statutory Consultee for ALC, and under the Development Management Procedure Order, LPAs are required to consult with Natural England on non-agricultural development proposals that involve the loss of **twenty hectares or more of the best and most versatile land**. The land protection policy is relevant to all planning applications, including those on

Ancient Woodland:

The site in question appears to be adjacent to Blake's Oak Ancient Woodland:



Natural England no longer provides bespoke responses regarding Ancient Woodland, as it is the responsibility of the Local Planning Authority to assess whether the needs and benefits of a planning application would outweigh the loss/deterioration of ancient woodland. Natural England's [Standing Advice for Ancient Woodland](#) sets out our views on the loss of Ancient Woodland and any indirect impacts (e.g. on Protected Species and breeding birds which inhabit the woodland, loss of connectivity, damage to the ground floor) that may result from this. Please note that Natural England's Standing Advice is a material consideration in the determination of planning applications **in the same way as any individual response received from Natural England** following consultation. More information regarding this (and other useful information) is available for viewing on the Natural England website, including instructions for viewing a map of the Ancient Woodland Inventory: <https://www.gov.uk/ancient-woodland-and-veteran-trees-protection-surveys-licences>.

The aim of the Ancient Woodland Inventory is mainly to raise awareness of and increase protection for ancient woodland and provide a robust evidence base to help inform planning decisions affecting Ancient Woodland. Ancient Woodland has no legal protection in the same way that the nationally significant conservation sites do; (a Site of Special Scientific Interest (SSSI) has legal protection under the [Wildlife and Countryside Act 1981](#) (as amended). Read more about this legislation on the [Joint Nature Conservation Committee website](#)). Ancient Woodland is, however, still a designation recognised by Local Planning Authorities and planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. (Click here for more information: http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/11-conserving-and-enhancing-the-natural-environment/#paragraph_118).

Designated Sites:

Generally speaking, it is the responsibility of the Local Authorities to earmark the most appropriate sites for potential development and assess their subsequent suitability. Natural England is unable to comment upon why individual sites have been selected or rejected as we are only statutory consultees (which means that Local Planning Authorities are required to consult with us) for planning applications which may potentially affect a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) or Important Wetland Area covered by the Ramsar Convention (for more information see [here](#)).

The above-mentioned proposal falls within close proximity to Sugworth SSSI and therefore Natural England are likely to be consulted on the above-mentioned proposal when planning permission is applied for. For information, Natural England has recently published a set of mapped Impact Risk Zones (IRZs) for SSSI/SAC/SPA/Ramsar sites. This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect a designated site and determine whether they will need to consult Natural England to seek advice on the nature of any potential impacts and how they might be avoided or mitigated. For guidance on how to access and use the Impact Risk Zones see our [summary information sheet: \(687kb\)](#) and [questions and answers: \(442kb\)](#). Further information is available on our website. <http://www.naturalengland.org.uk/ourwork/planningdevelopment/default.aspx>.

You can find the reasons why the SSSIs have been designated by clicking on the following website: <http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm>.

Viewing ALC data yourself:

For future reference, you can view both post 1988 ALC data and the Provisional ALC data yourself, by accessing the www.magic.gov.uk/ website. Copies of the [Provisional Agricultural Land Classification map](#) are also available on the Natural England Website. To access ALC data for your area of interest click on 'Maps' then 'Interactive Maps'. Agree to 'terms of use'. From the left of the screen select 'Landscape' then 'Geology and Soils'. The 'Agricultural Land Classification' subcategories are

'provisional' or 'Post 1988'. In the 'search box' at the top of the screen, select your 'search method' e.g. postcode/co-ordinates/places from the drop down box and type in your data.

Copies of the Provisional Agricultural Land Classification map are also available on the Natural England Website.

Further information about Agricultural Land Classification is also available in the ALC Technical Information Note (TIN 049), which is free to download:

<http://publications.naturalengland.org.uk/publication/35012>.

Appendix 10 Photographs taken from Barfleur Close, Peachcroft and the Public footpath close to Dunmore Road on the site to the west of the A4183 Road



Photographs 1 and 2 Flooding on Twelve Acre Drive and in the adjacent fields, which are part of the site to the East of the Oxford Road (2008)



Photograph 3 Flooding by the Public Footpath crossing the site to the West of the Oxford Road (November 2014)



Photograph 4 Rising ground to the West of the Oxford Road – land proposed for development (November 2014)