

## Comment

Consultee	T Lever (874119)
Address	62 Alexander Close Abingdon OX14 1XB
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	T Lever
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**Q1 Do you consider the Local Plan is Legally Compliant?** Yes

**Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)** No

**If your comment(s) relate to a specific site within a core policy please select this from the drop down list.** N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** Yes

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

The North Abingdon Local Plan group does not believe that the site known as the North Abingdon-on-Thames should be removed from the Oxford Green Belt. The draft local plan proposes to release a large swathe of prominent Green Belt land to the North of Abingdon for around 1000

houses including the North Abingdon-on-Thames site. The plan ignores government advice that “protecting our precious green belt must be paramount” and that boundaries should be altered only in “exceptional circumstances”. The Council have not demonstrated any exceptional circumstances for releasing this land from the Green Belt. Previous Local plans adopted by the Council have said that protecting the Green Belt land is a priority and that the extension of building northwards towards Lodge Hill should be “resolutely avoided”. This has in the past been endorsed by Planning Inspectors. Government advice published in October 2014 significantly states that advice in 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 recent Green Belt Review February 2014 did not recommend that the land to the east of the Oxford Road should be taken out of the Green Belt, yet a large area for approximately 390 houses has recently been proposed for this land. The council has stated that it does not want Radley and Abingdon to join up but this proposal if approved makes the gap much smaller and the remaining land extremely vulnerable. The land does make a significant contribution in preventing Abingdon-on-Thames and Radley merging into one another, a key purpose of a Green Belt. The land does make a significant contribution to safeguarding the countryside from encroachment. Both Dunmore Road and Twelve Acre Drive provide a natural boundary to the northern edge of Abingdon-on-Thames. Additionally the land to the east of the Oxford Road was included late in the Plan process in October 2014 and many local residents were unaware of its inclusion. The Government attaches great importance to Green Belts. In the National Planning Policy Framework it lists the five purposes of a Green Belt. We have considered these five purposes in our accompanying Topic Paper on Green Belts and consider that against four of the criteria the site makes a High Contribution to the Green Belt purpose. In the fifth purpose we consider that releasing the site from the Green Belt runs counter to the Government’s aim to recycle derelict and other urban land. We have included a summary table of the North Abingdon-on-Thames site against the five purposes of the Green Belt in the accompanying Topic paper which forms part of this submission. The North Abingdon Plan Group believes that the characteristics of the land in question has not been properly assessed and have been wrongly described. A Landscape and Visual Feasibility Study was commissioned for the site to the east of the Oxford Road yet no study was undertaken for the larger site to the west of the Oxford Road. The land to the east of Tilsley Park has high landscape value. In the Green Belt Review it states that “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”. The site is currently farmed and only a small part of the site is bordered by the A34 which is NOT elevated at this point. The North Abingdon Local Plan Group does not agree with the specific findings of the consultants concerning the site as assessed against the five purposes of the Green Belt as set out in national policy, tabled in the Green Belt Review. Following our own in depth examination of the site, we have produced our own summary table which is included in the attached Topic paper on the Green Belt in Abingdon.

Paragraph 5.42 states that all the sites fall within land that has been identified through the Green Belt Review to no longer meet the purposes of the Green Belt. This is not the case as the Green Belt Review proposed to keep the land to the east of the A4183 within the green belt boundary, yet the Council at a late stage included the site. Paragraph 5.42 states that the Council has considered the impact of allocating the sites carefully yet the consultant’s description of the land in question is flawed. The allocation of this land for housing would result in urban sprawl encroaching in to the countryside. One of the five purposes of the Green Belt is to preserve the setting and special character of historic towns. Abingdon-on-Thames is an important historic town and claims to be the longest inhabited town in the country. To develop this prominent site for housing would affect the setting and special character of Abingdon-on-Thames. Thus not only the setting and special character of Oxford should be preserved but also the setting and special character of Abingdon-on-Thames. The North Abingdon Local Plan Group has produced a detailed Topic Paper on this site in relation to the Green Belt and this is attached and forms part of this submission. We believe that releasing this land from the Green Belt would harm the purposes of the Green Belt. The onus is on the Council to demonstrate “exceptional circumstances” for releasing the site from the Green Belt. This has clearly not been done.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant**

**or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The North Abingdon Local Plan Group considers that the site should remain in the Green Belt as it is an important rim to the north of Abingdon and the setting of the historic town of Abingdon-on-Thames. Any housing would be unduly prominent given the slope of the land. The Council have not made a case for 'exceptional need' as required by the Government to release this land from the Green Belt. They have not carried out a proper assessment of the whole of the site. We believe that this site should remain in the Green Belt and should not be an allocated Housing site. The accompanying Topic Paper on the Green Belt substantiates our case.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?** Yes - I wish to participate at the oral examination

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

I am a member of the North Abingdon Local Plan Group and have researched the details of this proposed site and written the paper on the Green Belt implications. We have consulted widely in North Abingdon, including delivering 3000 leaflets and publicised the proposal since many residents have been unaware of the inclusion of this site. We have also held drop in sessions to offer informal advice in helping people submit their representations. I have lived in North Abingdon for thirty years and know the site well. Following on from my research and contacting relevant agencies, in addition to talking to residents, and speaking at a public meeting, I consider that I could best represent the views of the North Abingdon Local Plan Group concerning the planning implications of releasing the land from the Green Belt.