Vale of White Horse Local Plan 2031 Part 1 Strategic Sites and Policies Examination Stage 2 – Matters and Questions

## Written Statements from Mr and Mrs Robert Garrett

## Matter 5 – Proposed Revision of Green Belt Boundaries (including CP13)

7.1 Do the exceptional circumstances, as required ... exist ... proposed revision of ... Green Belt with regard to (a) Housing Sites 1,2,3,4, (b) land between sites 1 and 2, (c) other land not allocated?

In our opinion the answer is No.

As stated by Vale of White Horse District Council (VWHDC) documents, these areas have been designated as Green Belt since 1975. This was based on assessment criteria carefully considered at that time: criteria which have not changed since then.

The document "Local Planning Authority Green Belt: England 2014/15" reaffirms that "the Government attaches great importance to Green Belts". The NPPF goes further in its emphasis on protecting Green Belt land and the development of "Green Spaces". This document states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

Each VWHDC Plan over the last 40 years has accepted the Green Belt as it was originally created, and as fulfilling the five purposes. VWHDC has not identified in its new plan what has changed that makes all its previous conclusions regarding these sites no longer valid. It has also failed to identify what the "exceptional circumstances" required by the NPPF actually are.

Oxford City Council (OCC) has also considered the Green Belt issues in an "Informal Assessment" and "Oxford Strategic Growth Options High Level Review of Opportunities, Pro-forma Analysis". The latter argues that for Oxford City "exceptional circumstances" exist for a Green Belt review, and in a report in 2007 such a review for the area between Oxford and Abingdon was supported and then challenged at the High Court but the overall plan for the South East was revoked before it was heard.

It should be noted that the VWHDC Local Plan 2011, published in 2006, took "the view that there are no exceptional circumstances which necessitate a revision of the Green Belt boundaries" (paragraph 1.3). The same paragraph continued "For some purposes, such as Green Belt policy .... the policies have a longer perspective".

OCC's 2014 document identified that for these sites "a degree of urban encroachment has already occurred in the area which has reduced the Green Belt function. The most significant impact of open countryside in the area is the maintenance of a clear visual gap between settlements" though it also said this "could be maintained with carefully sited development".

So OCC see "exceptional circumstances" as does VWHDC, but neither state what these are or justify this robustly or with evidence which would either counter the policy that Green Belt should be permanent nor do they provide any statements and evidence which could be contested.

It may be significant that in the Sub-Area Strategies the VWHDC refer to "The Abingdon-on-Thames and Oxford Fringe Sub-Area will continue to provide *an* attractive place to live ... the Oxford Green Belt protected". This shows that the Council now see this as a single area which contradicts the purpose of green belts.

To a resident, it would appear that the five Green Belt Purposes are more strongly applicable to these

sites than ever: "checking unrestricted sprawl", "preventing neighbouring towns merging", "safeguarding the countryside", "preserving the setting and special character of historic towns", and "encouraging ... the recycling of ... other ... land".

The VWHDC proposals for Green Belt changes for these sites should be rejected.

7.2 Is it soundly based for ...

See answer to 5.1 above.

7.3 Does the plan adequately identify...

See answer to 5.1 above.

## 7.4 Is policy CP13 soundly based?

The Council's own text appears to contradict the Council proposals. It states that the Green Belt "will continue to be protected to maintain its ... permanence"; yet the Council proposes to reduce the Green Belt without any stated "exceptional circumstances" other than need which is excluded by Government statements, nor any statement as to what has changed in why some areas no longer fulfil the 5 purposes compared to the previous 40 years.

The "Draft Adopted Policies Map", which more correctly should be called "Draft Adopted Proposals Map" since these are proposals not policies, identifies the revised green belt area and those areas to be removed. Even the Council's own Tilsley Park is proposed to be removed from the green belt for no apparent reason and despite the council's own statement "donated by Mr Greening to Abingdon and the local community for sporting and recreational use, we encourage you to enjoy walks through its fields and woodland whenever you wish".

This map, where the reduced green belt area is identified by a matrix of green dots, gives the impression of a large and contiguous green belt between Oxford and Abingdon. This misleading impression is enhanced by the developed areas within the green belt being given lighter shading than the developed areas outside of the green belt. The addition of the striped area "Important Open Land" further hides the areas of green belt already developed. It should also be noted that this map fails to identify the ancient woodland in Area 2.

Turning north from the Dunmore Road (which as recently as 2010 was described as the Abingdon peripheral road) onto the Oxford Road away from Abingdon and towards Oxford one travels only ~500 metres before encountering Lodge Hill Garage with its large display of cars, then the entrance to Sitesafe UK, then White Horse Contractors, and the A34 trunk road. This area is also proposed to have an enlarged area for new access roads to the A34, a park and ride relocated from the Oxford ring road, and a parking area for 100 HGVs. Further to the west there is a similar narrow strip of open fields, trees and a public footpath before the A34 is encountered. It is also the case that the view of Abingdon ("historic market town set in rural Oxfordshire" to quote Abingdon Town Council) from Lodge Hill is currently splendid with the fields in the foreground and the town beyond; surely this is one of the features that a green belt should be there to protect as it has been for many years. Removing this 500 metre strip around the current Abingdon peripheral road will actually result in almost contiguous development from Abingdon to Bayworth in the north and Radley in the northeast; again contrary to the goals of the established green belt.