

Vale of White Horse Local Plan Part One

Response from
OXFORD GREEN BELT NETWORK

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Core Policy 13: The Oxford Green Belt

The Policy is unsound and unjustified because it is inconsistent with planning guidance on Green Belts and because it disregards statements on current government policy on Green Belts intended to guide local authorities in plan making.

The Vale's Policy 13 represents a complete change in direction on the Green Belt from one which, only two years ago, was protective of the Oxford Green Belt and supportive of its purposes to one which proposes to take several sites out of the Green Belt for development in Part One of the Local Plan and threatens other sites in Part Two which is to follow if the former is adopted. This turn around in Green Belt policy, which has been central to planning in the Vale ever since the District was established in the 1970s, strikes us as an over-hasty and uncritical response to the publication of the Oxfordshire Strategic Housing Market Assessment (SHMA). The adoption of housing targets based on the SHMA has taken place notwithstanding the criticism that has been levelled at the Assessment for the unjustified assumptions it makes on economic growth, population movement and housing need.

It is not the intention of the Oxford Green Belt Network (OGBN) to add to these criticisms or to repeat what others will have said about government policy. But we wish to highlight, in particular, the planning guidance issued earlier this year which makes it clear that unmet housing need does not amount to the very special circumstances needed to overcome the test of inappropriateness of development in the Green Belt, and that those who draw up Local Plans should take account of the likely adverse impacts of development proposed in the Green Belt. In the view of OGBN, this advice should have persuaded the Vale to revise its housing targets in order to protect the Green Belt.

Site-specific comments:

Part One of the Vale Local Plan seeks to build 1,510 dwellings in the Green Belt, spread over four sites. A Green Belt review was carried out in 2013 to guide the choice of sites, some of which were set out in the Vale's draft Local Plan. Further changes have been made since then, leading to these four sites being put forward in the submitted Plan, and with the prospect of many more to follow in a later Part Two of the Plan as stated above.

The normal practice in a Green Belt review appears to be to examine sites, suggested by, or to, the local authority, against the five basic purposes of Green Belt as set out in the National Planning Policy Framework (NPPF) and the earlier PPG.2. Sites chosen for possible development by the consultants carrying out the review are ones which, in their view, no longer meet the purposes of the Green Belt. OGBN challenges these assumptions as lacking a sufficient degree of objectivity, and also the conclusions which the local authority derives from them.

In the case of the Kennington and Radley sites, it is argued that development here would not represent encroachment into the countryside since they are contained within the existing built form and are less a part of the wider countryside. We disagree. The sites are partially contained by roads or, in the case of Kennington, by the railway, but this is not “built form”, and developing these sites would unquestionably represent encroachment into the countryside contrary to one of the five basic purposes of Green Belt policy. This was the view of the Inspector in his comments on the Oxford Fringe and Green Belt Local Plan, adopted in 1991, who stated clearly that development on the Radley site, north of Foxborough Road, would represent real encroachment of the built up area of Radley into the countryside.

Another basic purpose of the Green Belt is to prevent the merging of nearby settlements. This purpose would undoubtedly be compromised by allowing development as proposed on the North Abingdon site, narrowing the already small gap that separates the northern edge of Abingdon from Radley. The importance of protecting this gap was stressed in a 1983 Local Plan for Abingdon which advised against allowing development in the direction of Lodge Hill and, more recently, by the Vale’s own Green Belt consultants who, in their review, stated that the open landscape (around Radley Park) with its long views was important in maintaining the separation of Abingdon and Radley. The consultants went on to say that the openness of the area is important to the physical and visual containment of Abingdon, the existing perimeter road providing a clear change from built form to extensive open countryside. This rising ground is part of the landscape setting of Abingdon, an historic town, the protection of the setting of which is another of the reasons for which Green Belts exist. It is believed that there is ancient woodland here at Blakes Oak.

Not only have the Vale chosen to ignore this advice but the local authority has arbitrarily extended its designated Abingdon North site to the east of the A4183 (Oxford Road) at Peachcroft, without any warning or opportunity to consult local residents or others. No account appears to have been taken of the quality of the existing farmland or the convenience of farm tenants. The authority’s aim is said to be to create a large enough area of development to pay for an enlarged interchange at the Lodge Hill junction on the A34.

This proposed development of North Abingdon not only disregards in part the advice of the Vale’s own Green Belt consultants, but it ignores one of the important pieces of government advice on Green Belts, (paragraph 85 of the NPPF), that they should have easily recognizable boundaries in order to assist in ensuring permanence. What is described by the local authority as a sustainable urban extension is, in fact, unsustainable in its rejection of a firm boundary, the existing Abingdon perimeter road, and the proposed use of no more than hedgerows and trees as limits to the development that is intended beyond that road

In summary OGBN contends that Policy 13 is unjustified in its reliance on questionable statistics relating to housing need, and is unsound in its disregard of the fundamental rules on Green Belts, in particular the need to maintain the separation of settlements, the need to prevent encroachment into the countryside, and the need for sustainable boundaries.

Modification:

We recommend removal of all four sites in the Oxford Green Belt from the Local Plan Part One.