

Vale of White Horse Local Plan Part One: Strategic Sites and Policies

Publication Stage Representation Form

R	ef	:
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(For official use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document., the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts -

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

Personal Details*		Agent's Details (if applicable)
*If an agent is appointed, pleas boxes below but complete the t	e complete only the Title, Name and Organisation full contact details of the agent in 2.	
Title	Mrs	
First Name	Ticia	
Last Name	Lever	
Job Title		
(where relevant)		
Organisation	North Abingdon Local Plan Group	
(where relevant)		
Address Line 1	62 Alexander Close	
Line 2	ABINGDON	
Line 3	Oxfordshire	
LINE 3	Oxiorustille	
Line 4		
Post Code	OX14 1XB	
Telephone Number		
E-mail Address		

Name or Organisation :North Abingdon Local Plan Group									
3. To which p	3. To which part of the Core Strategy does this representation relate?								
Paragraph	5.39 5.40 5.42	Policy	CP 13	Proposals	Мар	Appendix 3 Pages 9-11			
4. Do you co	nsider the DPD	is:							
4.(1) Legally	compliant		Yes	✓		No			
4.(2) Sound Effective and	(Positively Prepart I Justified)	ared,	Yes			No —		NO	
4 (3) Complicoperate	es with the Duty	to co-		✓		No			

Please mark as appropriate.

5. 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.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

TYPE YOUR VIEWS HERE-

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.

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	the Inspector will dete ed that they wish to pa				opt to hear those	who
S	ignature:				Date:	16th Dec 2014

Name or Organisation :North Abingdon Local Plan Group									
3. To which part of the Core Strategy does this representation relate?									
Paragraph	6.82 6.108 6.111	Policy	CP 13	Proposals	Мар	Appendix 3 Pages 9-11			
4. Do you co	nsider the DPD i	s:							
4.(1) Legally	compliant		Yes	✓		No			
4.(2) Sound Effective and	(Positively Prepa I Justified)	red,	Yes			No 		NO	
4 (3) Complicoperate	es with the Duty	to co-		✓		No			

Please mark as appropriate.

5. 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 North Abingdon-on-Thames site should be released from the Green Belt. The Council have not demonstrated the 'exceptional circumstances' required for releasing the site from the Green Belt. The Council in paragraph 6.82 states that protecting the environment is an important theme of the plan, but The North Abingdon Local Plan group does not consider that the releasing of the site from the Green Belt and proposing housing on the site is protecting the environment. The site is on prominent rising land and any housing would be unduly intrusive in the landscape. We are also concerned about the traffic and air quality implications of developing this site and these issues are considered in different Topic Papers by NALPG but should be taken into account when examining the protection of the environment. Additionally the site makes an important contribution to the attractiveness of the landscape including the rolling sweep to the north of the site nearest Lodge Hill. Dunmore Road and Twelve Acre Drive form a clear boundary to the north of Abingdon.

Paragraph 6.111 refers to the core planning principle of the NPPF and states that planning should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes. The site makes an important contribution to the visual enjoyment and recreational use of many residents of North Abingdon and is a valued landscape. The importance of this valued landscape has been recognised and endorsed by a previous Local Plan Planning Inspector and this is detailed in the attached Topic paper.

The Council has failed to identify Blake's Oak Ancient Woodland immediately bordering the site and therefore neither this important feature, nor its protection, has not been taken into account when considering releasing this land from the Green Belt. How can we feel confident in the Council's analysis of the environmental contribution of this Green Belt site when important considerations have been overlooked?

No detailed survey has been undertaken to determine the exact quality of the farmland. We have been

informed that some of it is 'best and most versatile' by Natural England.

These issues are covered in more detail in the attached Topic Paper on the Green Belt.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

TYPE YOUR VIEWS HERE-

We believe that the site makes a valued contribution to the landscape of Abingdon and if released from the Green Belt and allowed for housing, then this will result in a very large intrusive development sprawling in open countryside, which because of the slope of the land will be unduly prominent. The biodiversity and currently undisturbed habitat of Blake's Oak Ancient Woodland will be lost forever. We consider that the site should remain in the Green Belt.

The Government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. The Government have also stated that the National Planning Policy Framework should be read as a whole and that need alone is not the only factor to be considered when drawing up a Local Plan. The Council appear so determined to meet the housing figures that any other planning consideration, including Government advice, is overridden.

The Councils case for building in the Green Belt is not sound.

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the ora
part of the examination?

No, I do not wish to participate at the oral examination	Yes	Yes, I wish to participate at the oral examination
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8. 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.

Signature:	Date:	16th Dec 2014

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.

Name or Org	ganisation :North A	Abingdon Local	Plan Group		
3. To which	part of the Core S	trategy does this	s representation re	elate?	
Paragraph	2.14 6.82	Policy CP 3	7 Proposa	als Map 3 Pages 9-11	
4. Do you co	nsider the DPD is	:			
4.(1) Legally	compliant	Yes	✓	No	
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Please mark as appropriate.

5. 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 North Abingdon-on-Thames site should be released from the Green Belt. Abingdon-on-Thames is a Historic Market Town and 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. If the site is released from the Green Belt and housing is allowed, the urban sprawl on this prominent site could destroy Abingdon's unique character. The high open land to the north of the town currently forms an attractive gateway. The land provides a distinct gap between the village of Radley and Abingdon and its development for housing would erode the distinctive sense of place currently enjoyed by both residents of Abingdon and Radley. This is further detailed in the accompanying Topic Paper on Green Belt.

(continue on a separate sheet/expand box if necessary)

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PE YOUR VIEWS HERE-		

The site should remain in the Green Belt and not be proposed for Housing to help preserve the setting of Abingdon-on-Thames and retain the distinct characteristics of Radley village and Abingdon-on-Thames..

If the site is released from the Green Belt and Housing is proposed then specific measures must be included to protect Blake's Oak Ancient Woodland from loss or damage.

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. 7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination. 8. 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. 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.							
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Name or Organisation :									
3. To which p	part of the Core Sti	rategy do	oes this repres	entation rela	te?				
Paragraph	6.108 6.111	Policy	CP44	Proposals	Мар	3 Pages 9-11			
4. Do you co	nsider the DPD is	:					_		
4.(1) Legally	compliant		Yes	✓		No			
4.(2) Sound Effective and	(Positively Prepare d Justified)	ed,	Yes			No		NO	
4 (3) Complicoperate	es with the Duty to	co-		✓		No			_

Please mark as appropriate.

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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 Abingdon-on-Thames site should be removed from the Oxford Green Belt. Abingdon-on-Thames is a historic Market town and the landscape to the north of the town provides a natural rim to the town. This is acknowledged by a previous Local Plan Inspector as documented in the accompanying Topic paper. The site forms part of this important landscape which rises to the north towards Lodge Hill and if developed for housing, it will result in substantial visual intrusion in this open countryside, made more significant by the slope of the land.

To the immediate west of the site is Tilsley Park, a recreational facility which has high floodlights which are regularly used to give light to the outside pitches and running track. These are already highly visible due to their height and the brilliance of the lights, and would be very intrusive to any new housing development on the site. They are highly visible from long distances in North Abingdon but for housing situated close to them on the proposed site, they would be highly intrusive contrary to Core Policy 44.

More information is contained in the accompanying Topic Paper by NALPG. Since the Council has failed to identify Blake's Oak Ancient Woodland there are no proposals to demonstrate how this aspect of the landscape character has been included in the text accompanying the Council's plan for this site.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 above where this relates to soundness. (NB

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TYPE YOUR VIEWS HERE-
We consider that the site makes an important contribution to the landscape to the north of Abingdon and should not be developed. The Council consultants have not undertaken a full landscape assessment of this prominent site. This should have been undertaken before recommending the site be released from the Green Belt and proposed for Housing. The Council have failed to recognise Blake's Oak Ancient Woodland
These issues are considered in the accompanying Topic Paper on Green Belt which also forms part of this submission.

Please note your representation should cover succinctly all the in and supporting information necessary to support/justify the repressuggested modification, as there will not normally be a subsequent make further representations based on the original representation stage. After this stage, further submissions will be only at the requelinspector, based on the matters and issues he/she identifies a examination.	entation and that opportunity to at publication st of the	e			
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Signature:	Date:	16th D			

Signature:	Date:	16th Dec 2014
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Name or Organisation :North Abingdon Local Plan Group									
3. To which p	3. To which part of the Core Strategy does this representation relate?								
Paragraph	6.115 6.119 6.120	Policy	CP46	Proposals	Мар	3 Pages 9-11			
4. Do you co	nsider the DPD is	:					_		
4.(1) Legally	compliant		Yes	✓		No			
4.(2) Sound (Effective and	(Positively Prepare Justified)		Yes			No 		NO	
4 (3) Complie operate	es with the Duty to	CO-		✓		No			

Please mark as appropriate.

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The North Abingdon Local Plan group does not believe that the North Abingdon-on-Thames site should be released from the Green Belt. Developing this site would result in loss of Green Belt habitat for wild life including sky larks and Red Kites in addition to countryside amenity enjoyed by residents of North Abingdon.

The Ancient Woodland of Blake's Oak adjoins the site and it is likely that this will be seriously impacted by the proposed housing development on the site. The proposed release of this land from Green Belt and the identification for housing will lead to a loss of biodiversity contrary to Core Policy 46 of the draft Plan. The Council has failed to recognise the existence of Blake's Oak Ancient woodland and therefor no protection has been suggested by the Council. Any housing development bordering this will lead to possible destruction or damage to this Ancient Woodland. Ancient Woodlands are irreplaceable features of our landscape since they take hundreds of years to develop and 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. Thus the part of the site adjoining this Ancient Woodland has an important role in conserving and enhancing the biodiversity the Council wishes to conserve, restore and enhance.

The Council have not identified that the site is within close proximity of Sugworth Site of Special Scientific Interest. Natural England have informed NALPG that because of the close proximity of Sugworth SSSI they would expect to be consulted on any planning application.

(continue on a separate sheet/expand box if necessary)

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TYPE YOUR VIEWS HERE-

NALPG believes that by developing this site there will be loss of habitat for wildlife and consequent loss of habitat restoration and biodiversity. Additionally there will be a loss of countryside amenity and ambiance enjoyed by many residents of North Abingdon.

We are concerned about the impact of any development of the site on the Blake's Oak Ancient Woodland. The construction of housing in the immediate vicinity with all its associated groundwork and over paving will totally change the nature and biodiversity contribution of this Ancient Woodland. This woodland is currently inaccessible but if housing is allowed then irreplaceable damage to its habitat will result contrary to Core Policy 46 of the draft Plan.

The development of this site for housing and urban uses is likely to result in a net loss of biodiversity, contrary to Core Policy 46.

Further details are set out in the accompanying Topic Paper on Green Belt.

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

8. 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.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who

Signature:	Date:	16th Dec 2014

have indicated that they wish to participate at the oral part of the examination.

Name or Organisation :						
3. To which part of the Core Strategy	does this repres	entation relate?				
Paragraph X.XX Policy	N	Proposals Map				
4. Do you consider the DPD is:						
4.(1) Legally compliant	Yes	✓	No			
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	NO		
4 (3) Complies with the Duty to co- operate		✓	No			
Please mark as appropriate.						
5. 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.						

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Signature: Date: nn Dec 2014	Signature: Date: nn Dec 20

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4 (3) Complies with the Duty to cooperate		✓	No			
Please mark as appropriate.						
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