

Vale of White Horse Local Plan Examination in Public Stage 2

Hearing Statement from North Abingdon Local Plan Group (NALPG) concerning Matter 5 – Proposed Revision of Green Belt Boundaries (including CP13)

Ticia Lever, December 2015

5.1 Do the exceptional circumstances, as required by the NPPF (paragraphs 79-86), exist to justify the plan's proposed revision of the boundaries of the Green Belt, having particular regard to:

(a) Housing Allocation sites 1, 2, 3 and 4?

(b) The land between sites 1 and 2, to the east of the A34?

(c) The land to be removed from the green Belt but not allocated for any particular use?

5.1a. Housing Allocation sites 1, 2, 3 and 4?

No - we consider that the Vale has not demonstrated the exceptional circumstances required by the National Planning Policy Framework (NPPF) to revise the boundaries of the Green Belt, having particular regard to Housing Allocation sites 1, 2, 3 and 4.

We have specifically looked in detail at Site 2 the North Abingdon-on-Thames site proposed for 800 houses but consider the Green Belt arguments apply to all four sites.

The Council believes that the need to meet the objectively assessed housing need in full within the district is an exceptional circumstance. We totally disagree with this and argue that the NPPF 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 guidance in NPPF makes clear that the Council should through the Local Plan meet objectively assessed need, unless there are any adverse impacts of doing so that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or that specific policies in the Framework indicate development should be restricted. Government advice is clear that such policies include land designated as Green Belt.

Paragraph 159 in NPPF states that Local Authorities should prepare a Strategic Housing Market Assessment to assess their full housing need. However this is only the first stage in developing a Local Plan. Once this need has been assessed, the Council should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the suitability, availability and the likely economic viability of the land to meet this housing need over the plan period. The Council should take account of constraints, including the Green Belt, where development is restricted, and which we consider could restrain the Vale in meeting the housing need.

The Vale seems determined to satisfy their housing figures at all costs, including sacrificing scarce and vulnerable Green Belt land and even adding a further sensitive Green Belt site (east of Oxford Road) very late in the process. Unmet housing need is not considered by the Government to be an exceptional circumstance to justify taking land out of the Green Belt. Planning Policy Guidance clearly states that unmet housing need in a particular area is unlikely to meet the 'very special circumstances' justifying inappropriate development on a site within the Green Belt.

The Oxford Green Belt is narrow compared to other Green Belts, and the Vale in the past, in accordance with Government policy, has consistently refused inappropriate development so that it is kept permanently open and the countryside safeguarded from encroachment. To allow land to be released from the Green Belt the Council has to justify that the land no longer satisfies the five purposes of the Green Belt as defined by NPPF. We do not believe this to be the case. Appendix 1 summarises why we believe development of the North Abingdon site is not consistent with the purposes of preserving the Green Belt. Any development will have a significant visual and landscape impact and will harm the openness of the area. It is not clear how the land that once met the purposes of the Green Belt could no longer do so.

One of the original justifications by the Council for releasing the site to the west of the Oxford Road in the draft Local plan 2031 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.*' Yet very late in the plan process a large area of further housing on Green Belt land on this very sensitive area was added, bringing development considerably closer to Radley. The integrity of the Green Belt would be further eroded and the coalescence between Abingdon and Radley brought closer.

This is contrary to stated policies in past Local Plans by the Council, reinforced by Planning Inspectors where the gap between Abingdon and Radley was considered to be very important and should be firmly maintained. The openness and permanence of the Green Belt is crucial. We strongly believe this should remain the case today.

Natural boundaries do not extend along the whole of the northern edge of the extended site as can be illustrated in the photograph taken from Oxford Road and the council need to justify the chosen boundary.



A previous Local Plan Inspector referred to the landscape rim to the North of the Town and considered that this important area should be protected and not developed and we concur with these findings. The landscape has not changed and we see no justifiable reason to disagree with the Inspector's findings.

Blake's Oak Ancient Woodland bordering the site was not recognised. A substantial landscaped area between the Ancient Woodland and the proposed housing would be required. Protection measures to safeguard this Ancient Woodland would be needed.

5.1b The land between sites 1 and 2, to the east of the A34?

The Council have no justification for taking the land comprising Tilsley Park out of the Green Belt. It is a valued Sports and recreational area within the Green Belt within walking distance of a large population and as such is an appropriate use within the Green Belt. Its athletics track is used for competitive regional events and their excellent and valuable facilities, including football pitches, are used by local people including schools during the day and local groups in the evening. If the site is removed from the Green Belt then the Council could decide that it was more valuable in monetary terms to sell for additional housing. Removing this site from the Green Belt could be seriously detrimental to the local amenities and health, especially at a time when the Government is encouraging us all to take more exercise!

Removing this site is contrary to advice in the NPPF, specifically paragraph 81 regarding enhancing the beneficial use of Green Belt including outdoor sport and recreation. Tilsley Park is a valuable and appreciated local resource, allowing great opportunities for outdoor sport and recreation. By removing the site from the Green Belt the Council is going against government advice and we cannot help but be suspicious of their intentions.

5.1c The land to be removed from the green Belt but not allocated for any particular use?

The Council finally confirmed in September 2015 that they propose to take 24 sites out of the Green Belt but they are not allocated for any particular use. We feel this is unwarranted and tantamount to inviting developers to submit further planning applications for development and could result in encroachment into open countryside which would set a precedent. We consider that there is insufficient justification to allow this. Government advice is that the Green Belt should only be altered in exceptional circumstances, not a free for all! Are there really 24 exceptional circumstances?

Government advice on 6th October 2014 at the time the draft Local plan was being altered was robust on Green Belts *'This government has been very clear that when planning for new building, 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.'

This protection of the Green Belt is reinforced in the Conservative Election manifesto and more recent Government statements on Green Belt. Yet little attention has been written in the draft Local plan concerning Brown Field sites and the register which all councils have to produce.

We note that there is a current Government consultation on proposed changes to national planning policy that reinforces the priority for using brownfield sites for housing but proposes that neighbourhood plans could allocate appropriate small-scale sites in the Green Belt for starter homes, provided they are clearly supported by local people.

5.2 Is it soundly based for Housing Allocation site 2 to include an area of land designated as Green Belt?

We do not consider that it is appropriate or in the interests of good planning that part of the proposed site remains in the Green Belt. We do not consider that proper public consultation has taken place on this change to include the Green Belt within the site.

The public consultation on the draft Local plan was between 26th February to 4th April 2014. On July 14th 2014 there was a briefing to the Long Furlong Community Association showing a North Abingdon Site with 410 houses, entirely to the west of the A4183. On 15th October the Council voted to submit the local plan to the Secretary of State.

However, the timing of events meant that there was no consultation about the change from 410 houses to 800 houses on the extended North Abingdon site.

A large and well attended Public Meeting concerning the Local Plan, and specifically the 1000 houses proposed in North Abingdon, was held on 3rd November 2014 at Long Furlong Community Association addressed by the local councillor Sandy Lovatt. This meeting was held because of the enormous local concern of the residents to the large increase and lack of consultation. The local plan map online at the time and the paper copy given out at the meeting showed that the site to the east of the A4183 did not retain any Green Belt within its boundary. However at some stage later in November 2014, the Local Plan 2031 Draft Adopted Proposals Map was published which indicated

that a large area of the site bordering Peachcroft Farm would now remain in the Green Belt. This meant the site to the east of the A4183 was reduced in size by approximately one quarter yet there was no reduction in the proposed housing numbers by the council. This would make a huge change to the housing density on the site. No reasons have been given by the Council for this change and despite being asked for the date this has not been forthcoming.

We estimate that just over a quarter of the area of the site zoned for housing has been left in the Green Belt. Including this site added 390 houses to the total for the North Abingdon site, so that figure should be reduced by around 100 houses. This would leave 410 houses to the West of the road up to Lodge Hill and 290 to the East, so 700 houses on the North Abingdon site – and not 800.

The Council also produced in November 2014 a leaflet 'The Future of the Vale Local Plan 2031 Part 1: consultation on the draft plan' which included a map of the Strategic Sites. Although the scale is small, Strategic Site 2 does not appear to include any land remaining in the Green Belt within the site. Considering such a large area of the site now is to remain in the Green Belt, it should have been clearly indicated. We consider that these last minute changes have been rushed through without proper public consultation and there should be consistency in the maps. In proposing that such a large area remain in the Green Belt within the site, the density of housing will considerably increase.

The North Abingdon Local Plan group was concerned the residents of Peachcroft were unaware that the site between the A4183 and Peachcroft Farm had been included as a Strategic Housing site late in the plan process. The North East Abingdon Community Association was not aware of the proposal when we wrote to them. As a result of this one of the local councillors joined our group.

The Council has not given any justification for this late change although it is clear from their Consultant's Landscape and Feasibility study that they considered there was limited potential to mitigate the impact of new built form on this site without harm to the local landscape character. One basic purpose of the Green Belt is to prevent merging of nearby settlements. No exceptional circumstances have been given by the Council to allow the development of this very sensitive site which would encroach on to the small gap of land between Abingdon and Radley. The openness and permanence of the Green Belt would be very seriously eroded.

5.3 Does the plan adequately identify the revisions to the Green Belt boundary that it proposes?

No - we believe that the Council have not made the proposed changes to the Green Belt sufficiently clear and understandable nor have they given sufficient justification. It is not clear in the plan where the existing Green Belt boundaries are and what are the proposed changes.

The various Council documents do not tie in with each other and are not clear for members of the public. For instance titles of important documents are seriously misleading. A major change in a document published in November 2014 titled 'Green Belt Review, Phase 3 report: Amendments to Boundaries of the Green Belt around Inset Villages and New Inset Village at Farmoor' includes a detailed plan indicating proposed revised boundaries to the Green Belt in Abingdon. Abingdon is a large market town, not a village and this important information could easily be missed by someone looking for proposed changes to Green Belt boundaries. Additionally the site to the east of the A4183 which was included as a strategic housing site in the draft Adopted Policies Map, published also in November 2014 was not included in this document.

This submission has already detailed the various discrepancies concerning the inclusion of part of the Oxford Green Belt in Housing Allocation Site 2 (see Matter 5.2 above). Planning needs to be clear and concise so the public can engage and participate. This has not been the case in the public consultation of this local plan and leaves the public feeling confused and disaffected. Government advice states that the public has an important role in the planning process and the formulation of Local Plans.

5.4 Is Policy CP13 soundly based?

The policy is unsound and unjustified and is inconsistent with NPPF and specific Government guidance on Green Belts and recent Government advice. One of the Council's justifications for removing so many sites from the Green Belt (including not only the Strategic Housing sites but around another 20 sites in addition) is to meet the objectively assessed housing need. This is clearly contrary to Government advice. Unmet housing need does not amount to the very special circumstances required to allow development in the Green Belt.

Worryingly it appeared at Stage 1 of the EIP that the Council was considering reviewing the Green Belt boundaries again as Part 2 of the Local Plan. In Paragraph 5.41 of the Plan it confirms this by stating '*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.’ Government advice in NPPF clearly states that ‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local plan.’ It does not state both through the preparation AND review. The Council has not recognised the advice in NPPF that *‘the essential characteristics of Green Belts are their openness and their permanence.’*

In past Local plans the Vale Council has been supportive of the Oxford Green Belt and this has been endorsed by Planning Inspectors, in line with tested Government policy. The Council now proposes to take land out of the Green Belt with very little justification, only what has been suggested in one Green Belt Review commissioned by the Vale and as yet untested. They have failed in our view to put forward the very special circumstances that must be demonstrated for each parcel of land to show that this outweighs any potential harm. A more recent Green Belt Study by Oxfordshire County Council has come to other conclusions. The County study states that *‘the relatively poor performance of land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.’*

The Government attaches great importance to Green Belts and makes it clear that priority for meeting the housing need should come from Brownfield sites and councils have to provide a register of these sites. However it appears that the Vale has decided by proposing that so many sites should be released from the Green Belt, that this is where development should be steered. This is contrary to tested Green Belt policies, will cause enormous harm to the environment and encroachment into the countryside between Abingdon, Radley, Sunningwell and Oxford.

Policy 13 does not include any reference to positively enhancing the beneficial use of the Green Belt, which could include access, sport and recreational activities, enhancing landscapes, visual amenity and biodiversity or the improvement of damaged and derelict land, as advised in NPPF.

The policy has not taken account of the fundamental aims of Green Belts, in particular the need to maintain the separation of settlements, the need for sustainable boundaries and the need to prevent encroachment into the countryside.

Appendix 1 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>