

Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications

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Response to LPP2 Draft Main Mods Consultation

I moved to Shippon with my family 17 years ago after living on various estates in Abingdon. What attracted me was its openness, rural setting and being in its historic centre. Once we had moved, I discovered a wonderful community which prized all these features.

Let me say that I am in favour of the Airfield site being utilised for the desperately needed new housing. However, this should not be at the cost of small villages such as Shippon being integrated in major new developments. I was pleased to see the original proposal to create a new Garden Village on the Airfield as a standalone settlement. Shippon as a separate but adjacent small village could gain from the amenities on such a new Garden Village. A simple buffer would facilitate such a separation and protect the openness and preservation of Shippon's historic centre and rural setting.

Indeed, the Inspector's letter dated 30 October 2018 and the subsequent response and map from the VWHDC clearly showed that Shippon would remain in the Green Belt and the site was adjacent to but not part of Shippon. I felt the Inspector was in tune with the wishes of the local community and at the same time showing that the VWHDC could deliver on its commitment for 1200 new dwellings in LPP2.

I was surprised and shocked then to see the Inspector's letter dated 19 December 2018 in which he reversed his previous statement in the 30 October 2018 letter "no more" by considering a much larger development on the built up area of Dalton Barrack way beyond LPP2's end date of 2031. This appears to have been the basis for not only now taking Dalton Barracks out of the Green Belt but also Shippon to create a continuous and integrated extension of the small village by initially 200% up to 2031 and with DB by at least 500% thereafter. This is not what a Garden Village should be nor is it in line with published Garden Village Principles. Surely, given that the Inspector himself said that "unambiguous data" did not exist for any larger settlement and then suggesting that in fact such a larger development was very unlikely without further evidence makes the current draft modifications MM4 and MM5 unsound.

LPP2 will be perfectly sound without taking Shippon out of the Green Belt.

I have therefore gone through all the main modifications (MM2, MM3, MM4, MM5 and MM27) relating to Shippon and commented on them in detail in the Addendum. I believe the inspector must reconsider taking Shippon out of the Green Belt in making his final decision on Modifications to LPP2.

I would also like to point to a number of supporting items which I believe are relevant:

Extract from www.planningresource.co.uk, 11 July 2014

An inspector has determined that a local plan policy adopted in 2006 which sought to prevent the coalescence of settlements in Lincolnshire was not out of date and continued to serve a useful planning purpose. In so concluding he dismissed an appeal for the erection of 74 dwellings on a four hectare greenfield site.

Great Coxwell Neighbourhood Plan

The Great Coxwell Neighbourhood Plan has been passed the referendum and is now on proceeding to adoption. The plan includes policy EDQ1 : Establish a green buffer to protect the village from coalescence. This establishes that a Neighbourhood Plan that has a policy of creating green buffer to prevent coalescence is an established principal.

Vale of White Horse District Council Policy NE10 - Urban Fringes and countryside gaps (LP 2011 saved policies).

In the Urban fringes and important open gaps between settlements development or changes of use which would harm their essential open and rural character will not be permitted.

Addendum - Detailed Comments on Draft Main Modifications

MM2 -Core Policy 4a: Meeting our Housing Needs

Additional Allocations

In addition to the strategic site allocations set out in **Core Policy 4**, development will be supported at the additional site allocations through a masterplanning process involving the community, local planning authority, developer and other stakeholders, where development meets the requirements set out within the Site Development Templates shown by **Appendix A** and are in accordance with the Development Plan taken as a whole. The following tables show how the level of housing required through additional sites will be distributed:

Abingdon-on-Thames and Oxford Fringe Sub-Area			
Settlement / Parish	Settlement Type	Site Name	Number of Dwellings
Shippon	Smaller Village	Dalton Barracks	1,200 ^{b, c}

^c The development proposed at Dalton Barracks will provide services and facilities equivalent to a Larger Village.

The allocation at Dalton Barracks has the capacity to deliver more housing, subject to appropriate infrastructure improvements. Housing which is in addition to the 1,200 homes is expected to be delivered after 2031.

"masterplanning process involving the community,...." So far such cooperation has not been demonstrated by the VWHDC nor the DIO.

Confirms Shippon is a small village settlement as per LPP1. It does not refer to St Helen Without parish.

It does not refer to Shippon plus DB as the larger village only to DB being equivalent to a larger village.

It deletes reference to any more housing above the 1200 homes up to and beyond 2031.

MM3 Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area

Same content as MM2. *Comments as above.*

MM4 Core Policy 8b: Dalton Barracks Supporting text, Para 2.49 to 2.65

Core Policy 8b: Dalton Barracks ~~Comprehensive Development Framework~~ **STRATEGIC ALLOCATION**
All new development at Dalton Barracks will be guided by a comprehensive **APPROACH TO MASTERPLANNING THE ALLOCATION** ~~development framework~~.

The new housing allocated at Dalton Barracks will be provided to an exemplar standard and following Garden Village principles to ensure the potential for highly sustainable and accessible development is fully realised. The ~~new settlement~~ **DEVELOPMENT** will form a mixed-use community incorporating on-site services and facilities, including ~~new schools~~ **EDUCATION PROVISION**, a local centre, providing local opportunities for employment and ensuring excellent public transport, cycleway and footpath connections to Oxford and Abingdon-on-Thames. This development will come forward in accordance with Core Policies 8a and 8b and the Site Development Template set

out in Appendix A.

The site is removed from the Oxford Green Belt in accordance with Core Policy 13a. The site area, however contains a ~~large~~ area of land that will remain within the Oxford Green Belt and any development on this area will be limited to Green Belt-compatible development. This area will include a ~~substantial Country Park~~ **PARKLAND**, located on the western ~~AND NORTHERN~~ sides of the site that should be planned for as part of the **OVERALL MASTERPLANNING FOR THE SITE** ~~comprehensive development framework~~.

Proposals for development at Dalton Barracks must demonstrate how they contribute towards a comprehensive approach to **MASTERPLANNING** ~~development~~.

The Council will continue to work with the Defence Infrastructure Organisation, Oxfordshire County Council, Natural England and other relevant stakeholders to ~~prepare~~ **ENSURE** a comprehensive **APPROACH TO MASTERPLANNING** ~~development framework~~ for the site. Additional guidance will be provided by a comprehensive development framework that will be published as a Supplementary Planning Document and will ensure **THE NEW HOUSING ALLOCATED AT DALTON BARRACKS** ~~proposals are~~ **IS** considered in the context of a comprehensive approach to the **MASTERPLANNING OF THE SITE** ~~whole site~~, including:

i i. the development is in accordance with the requirements of a travel plan for the whole site to make the necessary contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling.

i ii. the development is in accordance with and makes the necessary contributions to a comprehensive landscape plan for the whole site, including the provision of **PARKLAND** ~~a Country Park~~ of at least ~~80~~ **30** hectares.

i iii. proposals for new development and redevelopment should be demonstrated that there would be no adverse impact on Cothill Fen SAC and protection for the SSSI located to the **NORTH** west of the site, ~~and~~

i iv. proposals for buildings and structures (including their extensions) will not unacceptably harm the character and appearance of the surrounding area, taking into account their location, scale, bulk and height., **AND**

i v. **ANY EXTERNAL LIGHTING SCHEME MUST HAVE A MINIMAL IMPACT IN TERMS OF LIGHT POLLUTION.**

Is change from "development framework" to "approach to masterplanning" significant? No details are given on how these differ and the implications.

Highlights the new housing will follow "Garden Village principles" to ensure it is "highly sustainable". This does not state that the new development plus Shippon will be highly sustainable ie the new development in itself must be highly sustainable.

Significant change from "new settlement" to "development". How does this fit in with statements that the Airfield and DB could be developed after 2031 and result in a major new settlement and not a simple development?

Says "development will form a mixed use community" not that the development plus Shippon will form the community.

What does "education provision" mean if not a "new school"? This implies that a new primary school may not be built on the site putting significant pressure on existing schools in the area. Equally the

nearest existing primary schools are not accessible other than by car. If there is no primary school does this not imply that the land previously allocated would be used for yet more housing?

Site Development Template set out in Appendix A is covered below.

"The site is removed from the Oxford Green Belt in accordance with Core Policy 13a." - is this correct? How is potential harm assessed and by whom? As the site is "previously developed land" why does it need to be removed from the Green Belt?

"The site area, however contains aN large area of land that will remain within the Oxford Green Belt and any development on this area will be limited to Green Belt-compatible development." - How does this sit with the parkland of at least 30 hectares given that this area is previously developed land? Does this not mean that it is equally at risk of being developed under CP 13a?

Again, "comprehensive development framework" is replaced by "masterplanning" - what does this mean in practice?

It highlights "sustainable transport initiatives" but the current proposals contain significant errors, are not convincing and are not based on local knowledge and evidence. The Transport Evidence report is covered in a separate response.

" proposals for buildings and structures (including their extensions) will not unacceptably harm the character and appearance of the surrounding area, taking into account their location, scale, bulk and height," - This highlights the need for a buffer / strategic gap with Shippon?

Consequential modifications:

Amend Policies Map and Figure 2.3 accordingly to reflect reduced allocation and revision to boundary of Green Belt inset. **See Schedule of Draft Maps and Figures.**

Amend supporting text to reflect reduced allocation of 1,200 dwellings and to delete reference to long-term potential of the site, as follows:

2.49. The release of Green Belt land currently owned by the MOD at Dalton Barracks presents an opportunity for ~~the development of~~ a highly sustainable settlement **DEVELOPMENT**, located on substantially brownfield (previously developed) land and with minimal harm to the purposes of the Oxford Green Belt.

(remainder of paragraph is unchanged)

As the site is classed as "previously developed land" the development can take place without any changes to the Green Belt.

2.50. Development at Dalton Barracks will provide for new infrastructure (such as **EDUCATION PROVISION/ new schools**/local centre/**AND** open space) and opportunities for high quality sustainable transport connections between both the city of Oxford and Abingdon-on-Thames and beyond, incorporating walking, cycling, and public transport enhancements.

The current transport proposals do not appear to be sustainable and do not fully address the impact of the development on the existing transport connections.

2.51. It is important that this site is planned for comprehensively to ensure its potential **FOR as a** highly sustainable settlement **DEVELOPMENT** is fully realised and this will be guided by **Core Policy 8b: Dalton Barracks Comprehensive Development Framework STRATEGIC ALLOCATION**, which is discussed in more detail below.

2.54.However, it is anticipated that the military units will be re-located no later than ~~2026~~ **2029**.

The presence of the military units has no impact on the delivery of 1200 dwellings on the South of the Airfield.

2.57. The Council considers that development at Dalton Barracks has the potential to deliver a highly sustainable mixed-use development, incorporating Garden Village principles and including new services and facilities, ~~new schools~~ **EDUCATION PROVISION**, opportunities for local employment and a ~~substantial Country Park~~ **PARKLAND** of at least **30** 80 hectares.

MM4 states that the development will "follow" rather than "incorporate" Garden Village Principles. The former implies adopting GVPs in full.

2.62. Dalton Barracks lies to the east of a number of sites of ecological importance, including Cothill Fen Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI's). To provide a buffer between any proposed development on the site and the designated sites, the western ~~AND NORTHERN~~ **THE SITE** sides of Dalton Barracks ~~Country Park~~ **PARKLAND**, which will also provide recreational open space to residents of the site³³.

It is not clear how the remainder of the Airfield will be maintained and for what purposes? It is not clear how the military units will continue to gain access to Dalton Barrack via the Airfield up to 2029. Note the only entrance to the Barracks is from Barrow Rd across the middle of the proposed site as the Cholswell Rd entrance has been closed for security reasons.

THE HISTORIC CENTRE OF SHIPPON LIES TO THE SOUTH OF DALTON BARRACKS. IT REMAINS RELATIVELY INTACT AND STILL SURVIVES AS A HISTORIC VILLAGE WITH A RURAL APPROACH FROM THE WEST ALONG BARROW ROAD. DEVELOPMENT ON THE SOUTHERN PART OF THE SITE SHOULD RESPECT THE HISTORIC CHARACTER OF SHIPPON AND ITS RURAL APPROACH.

It is clear that to achieve this a strategic gap / buffer is essential and that Shippon should remain a small village as designated in LPP1 Core Policy 13a, and reinforced in MM2 and MM3, with the development of 1200 dwellings as a standalone sustainable development. Such a strategic gap would be totally compatible with and not in any impact the delivery of 1200 dwellings on the site.

2.63. The Part 2 plan makes provision for around 1,200 dwellings at Dalton Barracks to be delivered within the plan period up to 2031 in accordance with Core Policies 8a and 8b and the Site Development Template set out in Appendix A. However it is recognised that the longer-term potential for development is much greater., potentially in excess of 4,000 dwellings, subject to provision of appropriate infrastructure.

MM2 and MM4 delete any reference to development beyond 2031 and so should this para.

2.64. It is therefore essential that development is brought forward in line with a comprehensive development framework in accordance with Core Policy 8b
AND CONTRIBUTE TO INFRASTRUCTURE IN THE MANNER SET OUT IN THAT FRAMEWORK WHICH WILL REQUIRE ALL PHASES OF DEVELOPMENT TO CONTRIBUTE FAIRLY TOWARDS THE JOINT RESPONSIBILITIES FOR TRANSPORT, EDUCATION, OPEN SPACE AND OTHER INFRASTRUCTURE.

Why does this para. still refer to a "comprehensive development framework" when elsewhere this has been replaced by "masterplanning"?

2.65. The Council will work with the DIO and other key stakeholders, to prepare a comprehensive development framework for the Dalton Barracks site, which will be adopted as a Supplementary Planning Document (SPD). The Framework will provide more detailed guidance to inform proposals for **THE NEW HOUSING ALLOCATED** development on the site.

Why does this para. still refer to a "comprehensive development framework" when elsewhere this has been replaced by "masterplanning"?

Amend second sentence of paragraph 2.22 as follows:

At least **AROUND** 1,200 dwellings are allocated at Dalton Barracks within the Part 2 plan. with the potential for higher growth in the longer term, subject to appropriate infrastructure being delivered. This is discussed in more detail later in this chapter (under Additional Site Allocations and Strategic Policies for the Abingdon-on-Thames and Oxford Fringe Sub-Area).

The Site Allocation is "1200" and not "around 1200" which could be interpreted as allowing for significantly more dwellings to be built at higher density. Again, MM2 and MM4 delete any reference to development beyond 2031 and so should this para.

Amendment to Figure 2.1 to reflect extent of Dalton Barracks allocation and deletion of Harwell Campus allocation. **See Schedule of Draft Maps and Figures.**

Amendment to Figure 2.2 to reflect extent of Dalton Barracks allocation. **See Schedule of Draft Maps and Figures.**

Amendment to Figure 2.4 to reflect extent of Dalton Barracks allocation and deletion of public transport/cycle connection to Park and Ride at Lodge Hill. **See Schedule of Draft Maps and Figures.**

Amendment to Policies Map and Appendix B on page 32 to remove land safeguarded for a bus/cycle link to Dalton Barracks. **See Schedule of Draft Maps and Figures.**

MM5 Core Policy 13a: Oxford Green Belt

Insert additional paragraph at the end of Core Policy 13a as follows:

THE SETTLEMENT OF SHIPPON (INCLUDING THE PROPOSED AND EXISTING DEVELOPMENT AT DALTON BARRACKS) IS INSET TO THE GREEN BELT AS SHOWN ON THE ADOPTED POLICIES MAP.

Amend paragraphs 2.74 to 2.75 of the supporting text to reflect reduced housing allocation and revision to boundary of Green Belt inset, as follows:

2.74 The area proposed does not extend beyond the Dalton Barracks site. ~~as the site is large enough to accommodate a substantial sustainable settlement in its own right. This approach ensures that the potential for development is maximised and that further changes to the Green Belt will not be required in the future.~~ The openness between Abingdon-on-Thames and Shippon, Shippon and Wootton, of much of the existing airfield area, and between the proposed new development and Whitecross, are all substantially maintained (Figure 2.3). Shippon **AND THE EXISTING AND PROPOSED DEVELOPMENT AT DALTON BARRACKS** is inset to the Green Belt as it will form an integrated and continuous settlement **ALBEIT PROTECTING AS FAR AS POSSIBLE THE EXISTING CHARACTER OF SHIPPON** with Dalton Barracks.

It is clear that to achieve this a strategic gap / buffer is essential and that Shippon should remain a small village as designated in LPP1 Core Policy 13 with the development of 1200 dwellings as a

standalone sustainable development. Such a strategic gap would be totally compatible with and not in any impact the delivery of 1200 dwellings on the site. Residents of Shippon (84%) do not wish Shippon to form an integrated and continuous settlement with any new development on the Airfield. The use of "as far as possible" is cause for concern as this leaves open significant scope for mitigating impact on the historic core of this ancient small village.

2.75 The 'exceptional circumstances' to justify the amendment to the Green Belt boundary at Dalton Barracks are:

- the availability of a highly sustainable and significant site for development, not previously available, and so not previously considered either by the Oxfordshire Growth Board as a potential site to accommodate unmet housing need for Oxford, or by the Vale of White Horse through preparation of the Local Plan 2031 Part 1. This change is considered to be a 'major change in circumstances'
- assessment work, ~~including~~ **COMPRI**SING a Green Belt Study of the potential development sites considered in preparation of the Part 2 plan, ~~including for Dalton Barracks and the surrounding land,~~ **INCLUDING PROPOSED AND EXISTING DEVELOPMENT AT DALTON BARRACKS**, which demonstrates that its removal from the Green Belt for development would have limited impact on the function of the Green Belt
- the site is close to Oxford and has the potential to be developed as a highly sustainable ~~new community~~ **DEVELOPMENT** with excellent public transport, walking and cycling connectivity to Oxford and Abingdon-on-Thames and is considered to be compatible with the Spatial Strategy set out in the Part 1 plan, and
- the site contains a large area of brownfield (previously developed)39 land).

Dalton Barracks and the Airfield are classed as previously developed land and as such can be developed within the existing Green Belt boundaries and designation. The proposal to remove the built up areas of Shippon and Dalton Barracks cannot be justified as this is not required for delivery of 1200 dwellings up to 2031. Even if the built up area of DB becomes vacant after 2029, this can be developed without any need to change the Green Belt. Under no circumstance can the historic village of Shippon be considered as having potential for development. It must retain its current protection as a small village washed over by the GB. It cannot be combined with a 200% larger new development to create a larger village inset to the GB with a significant loss of protection and risk of significant damage to its open historic core.

Amendment to Policies Map to reflect revision to boundary of Green Belt inset. See Schedule of Draft Maps and Figures.

Amendment to Appendix L: Proposed Alterations to the Oxford Green Belt to reflect reduced allocation at Dalton Barracks. See Schedule of Draft Maps and Figures.

MM6 Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

Insert additional scheme at the end of Core Policy 12a as follows:

- **UPGRADED FOOTPATH BETWEEN SHIPPON AND ABINGDON-ON-THAMES**
- 2.81 As explained above, and in addition to a new Park and Ride facility at Lodge Hill, land is also safeguarded for an additional lane on the A34 to accommodate a single carriageway north-bound bus lane between the Lodge Hill and Hinksey Interchanges. This will facilitate efficient access via sustainable public transport modes to Oxford from the A34 corridor to the south, Abingdon-on-Thames and the proposed new sustainable settlement on land at Dalton Barracks. **LAND IS ALSO**

SAFEGUARDED FOR AN UPGRADED FOOTPATH BETWEEN SHIPPON AND ABINGDON-ON-THAMES.

This existing footpath links Faringdon Rd, Shippon with Copenhagen Drive, Abingdon via a footbridge across the A34. It is very rarely used as in Abingdon it ends on the edge of a large housing estate, far removed from any amenities and the centre of Abingdon. It is not included or mentioned in the Transport Evidence Report.

MM27 Appendix A: Site Development Template, Dalton Barracks

Amendment to Appendix A: Site Development Template for Dalton Barracks on page 13 and template on pages 14-16 to reflect reduced allocation of 1,200 dwellings. **See below and Schedule of Draft Maps and Figures.**

Amend bullet point 1 under 'Key objectives' for Appendix A: Site Development Template as follows:

- To deliver an exemplar, sustainable, mixed use community that reflects 'Garden Village' principles and follows a comprehensive development framework approach in accordance with Core Policy 8b: Dalton Barracks Comprehensive Development Framework **STRATEGIC ALLOCATION** and Supplementary Planning Document for Dalton Barracks

First mention of a "Supplementary Planning Document" rather than "masterplanning" - What is the difference?

Amend bullet point 2 under 'Urban design principles' for Appendix A: Site Development Template as follows:

- The **SITE'S** masterplan should ~~give consideration to the development potential of the entire site and~~ ensure infrastructure requirements, including Green Infrastructure, are considered from the outset.

Amend bullet point 3 under 'Urban design principles' for Appendix A: Site Development Template as follows:

- The **DEVELOPMENT OF THE** ~~overall development potential of the site will be informed by the~~ **A COMPREHENSIVE APPROACH TO** masterplanning, **AND ADDITIONAL GUIDANCE WILL BE PROVIDED** through the preparation of the Supplementary Planning Document. ~~and be contingent on appropriate infrastructure delivery.~~

Infrastructure delivery is the number one concern of residents both existing and those who move to any new development and is increasingly seen as a priority in scheduling the delivery of dwellings.