

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Madeleine	
Last Name	Russell	
Job Title (where relevant)	Chair to St Helen Without PC	
Organisation representing (where relevant)	St Helen Without Parish Council	
Address Line 1	26 Rookery Close	
Address Line 2	Shippon	
Address Line 3		
Postal Town	Abingdon	
Post Code	OX13 6LZ	
Telephone Number	01235 523557	
Email Address	madbill@me.com	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

2.74

Policy

Core 4a,
Development
29, Core 13

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

No

4. (2) Sound

Yes

☐

No

No

4. (3) Complies with the Duty to Cooperate

Yes

Yes

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Green Belt

Core Policy 4a, Core Policy 13, Development Policy 29, Paragraph 2.74

The Vale of White Horse District Council's Publication Version of LPP2 allocates 1200 houses at the Dalton Barracks site and the adjoining Abingdon Airfield to provide a proportion of their requirement for Oxford's Unmet Housing Need by the end of the plan period of 2031.

Paragraph 2.74 proposes that the small historic village of Shippon will form an integrated and continuous settlement with this new development.

To achieve this and for future development the Vale has requested an enormous area of the Dalton Barracks and the adjoining Abingdon Airfield MOD site and the village of Shippon be removed from the Green Belt. It states this area could accommodate 4000 + dwellings without giving any justification of the need for this higher number. The Plan is based on the 2014 Strategic Housing Market Assessment [SHMA], which is under review and Oxford's Unmet Housing Need which lacks evidence to substantiate the assessed need. Previous Planning Inspector's advice was against removing land from the Green Belt when it is unclear if the land would be needed for future development. There is no evidence to substantiate that future development of the scale predicted, is going to be necessary or appropriate beyond 2031, particularly in the present economic and political climate.

The need for this level of development at Dalton Barracks has not been established.

Dalton Barracks consists of an operational area [behind the security fence] a definite brownfield site and an airfield with runways, hardstandings and the footprints of a very few small buildings. The 1200 dwellings could easily be accommodated in the northern area of the brownfield site, (Core Policy 13).

The Parish Council is in agreement with the proposal that the Vale intends to apply Garden Village principles to the new development at Dalton Barracks and wishes to be actively involved in the Supplementary Planning Document for the site.

Therefore, there is no substantiation for the removal of land from the Green Belt for the period of this plan.

As the western boundary of the area has been revised with considerable extra land taken out of the green belt we contend that this does not comply with NPPF.

NPPF paragraph 85 states the parameters for setting new green belt boundaries.

“Define boundaries clearly using physical features that are readily recognisable and likely to be permanent”.

As it stands, the western perimeter of the green belt on the airfield, as proposed in the plan, is indistinct and contrary to the above guidance.

This also conflicts with the purposes of green belt openness designation (NPPF paragraph 80), as the present large scale open aspect across the airfield allows wide ranging views towards the North Wessex Downs on the southern horizon.

At present Shippon village is a discrete village with no coalescence to the brownfield site of Dalton Barracks. Development Policy 29, recognises the importance of settlement identity and character, attributed by the Vale.

There is no justification for removing the village of Shippon from the Green Belt. Any areas within the village that can be developed are on previously developed sites which will cover the village’s foreseeable need. (Core Policy 13.)

The uncertainty regarding the availability of the release of the operational area of Dalton Barracks may affect the deliverability of the 1200 properties by 2031. The only indication we have is a comment from the Vale that ‘the Council believes delivery will be achievable by the end of the plan period’. Given the Inspector’s previous advice about not releasing ground from the Green Belt unless there is a proven need for its use **until the actual deliverability of the site is confirmed, it is not legally compliant to justify the removal of any land from the Green Belt.**

No exceptional circumstances have been proven, making LPP2 unsound.

As a Council we strongly believe that we do not have a mandate to approve decisions of this nature that will affect future generations. They have a right to consider such matters according to the circumstances prevailing at the time.

(Continue on page 4 /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 matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

The allocation under this Plan can be accommodated on part of the Operational Area [previously developed land] without removing any land from the Green Belt. This area needs to be clearly designated.

When the deliverability of the whole site is confirmed by the MOD, then the justification for the envisaged larger development can be considered, if this housing need is still required. This will be for the Vale’s next Plan, post 2031. In the next plan, this site would then be appropriate

for the development of a Government Approved Garden Village, embracing all the designated principles and infrastructure this would include.

The removal of any areas from the Green Belt and the prevention of the coalescence of Shippon with the new development, could then be considered.

(Continue on page 4 /expand box if necessary)

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

☐ Yes

Yes, I 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:

The PC is challenging the soundness of taking Dalton Barracks, the adjoining Abingdon Airfield and Shippon Village out of the greenbelt in this plan; no exceptional circumstances have been proven. SHW PC would appreciate the opportunity to state our case.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related

documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☐ Y

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

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Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	Mrs	
First Name	Madeleine	
Last Name	Russell	
Job Title (where relevant)	Chair to St Helen Without PC	
Organisation representing (where relevant)	St Helen Without Parish Council	
Address Line 1	26 Rookery Close	
Address Line 2	Shippon	
Address Line 3		
Postal Town	Abingdon	
Post Code	OX13 6LZ	
Telephone Number	01235 523557	
Email Address	madbill@me.com	

2. Agent's Details (if applicable)

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

4a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

Yes

No

4. (2) Sound

Yes

No

No

4. (3) Compiles with the Duty to Cooperate

Yes

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Submission 2 Infrastructure

Core Policy 4a - Meeting our Housing Needs

St Helen Without Parish Council is extremely concerned of the impact that all the presently approved development at Abingdon North West and Marcham, along with the addition of the 1200 homes at Dalton Barracks and the adjoining Abingdon Airfield, will have on the existing infrastructure without sufficient funding being approved in advance for improvements.

In LPP2 Core Policy 4a the Vale state:

“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.”

SHWPC's View

1. The roads in the village of Shippon, Cothill and Dry Sandford are at full capacity at present, particularly at peak times, exacerbated by the number of private schools in the area. These are smaller rural roads which are already not maintained sufficiently for the present volume and additional volume will result in further deterioration. The additional 1200 homes will severely stretch capacity for these roads, particularly in peak hours. The Council has modelled potential traffic flows which indicate a considerable increase in traffic flow for Cothill, Shippon, Dry Sandford, Wootton and Sunningwell without upgraded roads infrastructure. Problems will also be encountered by construction traffic; therefore, improvements must be phased in before any development commences. This also applies to all essential services, gas, electricity, water and drainage.

2. The Vale's plan to relocate the new Park and Rides at Cumnor and Lodge Hill is considered sensible by the Parish, but will increase the volume on these rural roads, particularly for Wootton and Sunningwell. However, this will free up land at Redbridge and Pear Tree which could then be used to meet some of Oxford's Unmet Housing Need.
3. The plan proposes bus and cycle lane access to and from the proposed park and ride sites running across green belt land from Whitecross. This land was deemed a priority for protection in the Hankinson Duckett Associates Green Belt Study 2017. Whilst development of transport corridors on the Green Belt is permissible under Core Policy 13, the bus and cycle lanes from Dalton Barracks to the Lodge Hill Park and Ride require land out of the Green Belt and SHWPC opposes this as it is not necessary under this Plan. Cycle lanes only may be more appropriate for the duration of this Plan so reducing the developmental impact on the Green Belt.
4. The new southern slip roads on the A34 at Lodge Hill should help to alleviate some of the traffic congestion in North Abingdon but needs to be fully funded and built before approval is given for the large-scale development the Vale plan at Dalton Barracks and the adjoining Abingdon Airfield.

The above points make the Publication Version of LPP2 unsound

(Continue on page 4 /expand box if necessary)

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The envisaged total future development by the Vale on Dalton Barracks and the adjoining Abingdon Airfield would have an enormous impact on the existing infrastructure and before this can be incorporated, it needs to be fully addressed before the Plan could be considered to be sound.

(Continue on page 4 /expand box if necessary)

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

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Yes

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Signature:

Date:

22.11.17

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