



**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](mailto: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	Dr	
First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
Organisation representing (where relevant)	Wootton and St Helen Without Neighbourhood Plan Steering Group	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.74  
3.223

Policy

3  
4a

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

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.

### WSHWNP Representation 1: Shippon

Core Policy 4a allocates 1,200 dwellings to the Dalton Barracks site, and paragraph 2.74 states that the small, historic village of Shippon is to form an integrated and continuous settlement with this new development. However:

- Shippon is classified in the Local Plan 2031 as a smaller village.
- Core Policy 3 and paragraph 3.223 state that in smaller villages only proportionate development necessary to meet local needs will be allowed.
- 1,200 dwellings can in no way be considered a proportionate scale of development for a smaller village, as it superimposes a larger village onto a smaller village, and the allocation is twice that of the largest allocation to a larger village in the same sub-area in Part 2 (600 dwellings at Kingston Bagpuize).
- The new development at Dalton Barracks is also not intended to meet the needs of Shippon, as no such needs have been identified for Shippon. The development at Dalton Barracks is intended to provide VoWHDC's proportion of the quantum of unmet need for Oxford.

The planned coalescence of Shippon with the new development at Dalton Barracks is therefore **unsound** as there is **no justification** for such a large allocation of dwellings to

Shippon in terms of local needs, and the scale of the planned development **contradicts VoWHDC's own spatial strategy** for smaller villages as laid out in its Local Plan 2031.

In addition, while residents of Shippon have had an opportunity to comment on these plans (and have done so) through the earlier consultation on Part 2, the responses received have not been heard by VoWHDC. Through both the Council's consultation on Part 2 and specific consultation undertaken by St Helen Without Parish Council on the plans for the new development at Dalton Barracks, Shippon residents were clear, robust and almost unanimous in their rejection of the planned coalescence of the two settlements. 94% of respondents to the Parish Council consultation (the results of which were sent to VoWHDC as part of their previous Part 2 consultation) were against the merging of Shippon with the new development at Dalton Barracks. For such strong opposition from the existing local community to be ignored is hugely disappointing, especially given VoWHDC's responsiveness to other local concerns about the previous proposal to remove Whitecross from the Green Belt. More importantly, though, this lack of responsiveness further **undermines the evidence base and justification** for the proposed coalescence of Shippon with the new development at Dalton Barracks, making this aspect of Part 2 even more **unsound**.

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 Local Plan needs to specify that Shippon will be retained as a discrete and individual settlement, and that the new development planned for Dalton Barracks will be separate from the historic smaller village of Shippon, so that Shippon remains a historic smaller village with its own identity.

This would make this aspect of the Local Plan sound as it would be consistent with the spatial strategy laid out in the Local Plan: the smaller village of Shippon would no longer have an inappropriately sized development allocated to it despite there being no evidence of local need for any development whatsoever. It would also accommodate the views of the vast majority of Shippon residents. While these residents appreciate the appropriateness of some development at Dalton Barracks if the army relocates, this should not be taken to mean that they are in support of development if the army does not relocate. In any event, they do not want their village to merge with any new development at Dalton Barracks, and they are currently both dismayed and angered by having their clearly expressed views ignored by VoWHDC.

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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**, 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 proposed merger of Shippon with the new development at Dalton Barracks is a matter of great and strongly felt concern to local residents, due to its inevitable impacts on their small historic village. Many local residents also feel that VoWHDC is ignoring them. It is therefore important that a representative of the local community has the opportunity to speak for those local people who feel voiceless.

**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: **18 Nov 2017**

### **Sharing your personal details**

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**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?**

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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.

### 2. Agent's Details (if applicable)

Title	Dr	
First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
Organisation representing (where relevant)	Wootton and St Helen Without Neighbourhood Plan Steering Group	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.74  
3.226  
3.228

Policy

4a  
29

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

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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### WSHWNP Representation 1a: Character and Gaps

Paragraph 3.226 states that the Council recognises the importance of safeguarding the separate identity and characteristics of individual statements.

Paragraph 3.228 claims that the Council seeks to protect further against the loss of physical or visual separation between villages.

Development Policy 29 states that proposals will need to demonstrate that the character of settlements is retained and their visual/physical separation is maintained.

However, Core Policy 4a allocates 1,200 dwellings to the Dalton Barracks site, and paragraph 2.74 states that the small, historic village of Shippon is to form an integrated and continuous settlement with this new development.

The proposed merger of Shippon with the new development at Dalton Barracks flies in the face of the Council's stated recognition of the importance of settlement identity and character, and contradicts its own Development Policy 29, by stripping Shippon of its distinctiveness and discreteness. Such **internal inconsistency** in the Local Plan renders VWHDC's proposals for the Dalton Barracks development **unsound**.

In addition, and as noted elsewhere (see WSHWNP Representation 1), 94% of respondents to the St Helen Without Parish Council consultation (the results of which were sent to

VoWHDC as part of their previous Part 2 consultation) were strongly against the merging of Shippon with the new development at Dalton Barracks. For such extensive and powerful opposition from the existing local community to be ignored is disappointing to those residents, as they are being denied their local identity even as they express it, and they are denied that identity by an authority that claims to value and protect local identity. This suggests that claims to protect the characteristics and identity of individual settlements are disingenuous at best and **challenges any claims to meaningful community involvement** in the development of the Local Plan. It also **undermines the evidence base and justification** for the proposed coalescence of Shippon with the new development at Dalton Barracks, making this aspect of Part 2 even more **unsound**.

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 Local Plan needs to specify that Shippon will be retained as a discrete and individual settlement, and that the new development planned for Dalton Barracks will be separate from the historic smaller village of Shippon, so that Shippon remains a historic smaller village with its own identity.

This would make this aspect of the Local Plan sound as it would be consistent with the Council's stated recognition of the importance of settlement identity and character: the smaller village of Shippon would no longer be swallowed up by the development at Dalton Barracks. It would also accommodate the views of the vast majority of Shippon residents, who – while supporting appropriate development at Dalton Barracks if the army relocates – do not want their village to merge with the new development, and who are currently both dismayed and angered by having their clearly expressed views ignored by VoWHDC.

**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.

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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**, 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 proposed merger of Shippon with the new development at Dalton Barracks is a matter of great and strongly felt concern to local residents, due to its inevitable impacts on their small historic village. Many local residents also feel that VoWHDC is ignoring them. It is therefore important that a representative of the local community has the opportunity to speak for those local people who feel voiceless.

**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:

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**Q6 – modifications**

The release of the land at Dalton Barracks provides a prime opportunity for VWHDC not only to protect against further erosion of visual/physical separation between Shippon and Dalton Barracks, but to enhance that separation and thereby enhance the distinctiveness, character and identity of Shippon too. This would be fully consistent with paragraphs 3.226 and 3.228 and Development Policy 29, and would protect the historic, rural character of Shippon for the future.

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## Part A

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### 2. Agent's Details (if applicable)

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First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
Organisation representing (where relevant)	Wootton and St Helen Without Neighbourhood Plan Steering Group	
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Address Line 2		
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## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.58  
2.74

Policy

4a  
8b

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

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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### WSHWNP Representation 1b: Garden Village

Paragraph 2.58 lays out the ‘garden village’ principles that VWHDC intends to apply to the new development at Dalton Barracks. However, these principles are garden *city* rather than garden *village* principles. In extending garden city principles to smaller scale settlements, the Government’s prospectus *Locally-Led Garden Villages, Towns and Cities* (DCLG, 2016) updates the former garden city principles by specifying that garden villages should be discrete settlements. The text below is reproduced from this prospectus:

#### *Free-standing settlement*

*14. The garden village must be a new discrete settlement, and not an extension of an existing town or village. This does not exclude proposals where there are already a few existing homes.*

Core Policy 4a of the Local Plan Part 2 allocates 1,200 dwellings to the Dalton Barracks site, and paragraph 2.74 states that the small, historic village of Shippon is to form an integrated and continuous settlement with this new development. The Dalton Barracks development, as currently proposed to merge with Shippon, clearly contradicts the specification that a garden village should be a discrete settlement. As Shippon is an historic, rural, smaller village – far

more substantial than ‘a few existing homes’ – it is totally inappropriate for the new development to merge with Shippon. The proposed coalescence of Shippon with the new development at Dalton Barracks is **inconsistent with national priorities** for garden villages, making this proposal **unsound**.

In addition, and as noted elsewhere (see WSHWNP Representations 1 and 1a), Shippon residents were clear, robust and almost unanimous in their rejection of the planned coalescence of the two settlements in the Parish Council consultation (the results of which were sent to VoWHDC as part of their previous Part 2 consultation). For such strong opposition from the existing local community to be ignored is hugely disappointing, especially given the emphasis in the garden village prospectus on such developments being locally-led with strong community involvement. Such disregard for the views of existing local residents significantly **undermines any stated attempt at community involvement** and any prospects for community support for the development, putting the proposal even more **at odds with national priorities** for garden villages. Further, this lack of responsiveness **undermines the evidence base and justification** for the proposed coalescence of Shippon with the new development at Dalton Barracks, making this aspect of Part 2 even more **unsound**.

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 Local Plan needs to specify that Shippon will be retained as a discrete settlement, and that the new development planned for Dalton Barracks will also be a discrete settlement, separate from the historic smaller village of Shippon. The discrete nature of the new development at Dalton Barracks should be stated explicitly in the principles laid out in paragraph 2.58, in Core Policy 8b (Dalton Barracks Comprehensive Development Framework), in the Site Development Template for Dalton Barracks in Appendix A, and at any other relevant points in the local Plan.

This would make this aspect of the Local Plan sound as it would be consistent with the Government’s published priorities for garden villages: the new development would be specified as a discrete settlement, separate from rather than overwhelming the existing historic smaller village of Shippon, and the new development would receive more support from the local community, by accommodating the expressed wishes of Shippon residents.

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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**, 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 proposed merger of Shippon with the new development at Dalton Barracks is a matter of great and strongly felt concern to local residents, due to its inevitable impacts on their small historic village. Many local residents also feel that VoWHDC is ignoring them. It is therefore important that a representative of the local community has the opportunity to speak for those local people who feel voiceless.

**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: **18 Nov 2017**

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**Q6 – modifications**

The release of the MoD land at Dalton Barracks provides a prime opportunity to do something truly visionary for the local area, in relation to both the new development at Dalton Barracks and the existing historic village of Shippon. Unfortunately, the proposals for the Garden Village at Dalton Barracks in Part 2 seem somewhat half-hearted, e.g. applying garden city rather than garden village principles, and the treatment of Shippon in Part 2 is wholly inappropriate and unjustified (see WSHWNP Representations 1 and 1a). If VWHDC had the vision or enthusiasm to apply garden *village* principles, i.e. ensuring that the new development at Dalton Barracks is a self-contained and discrete settlement rather than a bolt-on to an existing settlement, the problems outlined in this and associated representations would evaporate. In addition, the distinctiveness of Shippon could be protected and enhanced, by increasing the visual and physical gap between the two settlements, which in turn could be used to enhance the value of the Green Belt in this area, by making more green space available, both visually and physically to residents of both settlements. For further consideration of issues relating to the Green Belt, please see WSHWNP Representations 2, 2a and 3.

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### 2. Agent's Details (if applicable)

Title	<input type="text" value="Dr"/>	<input type="text"/>
First Name	<input type="text" value="Janet"/>	<input type="text"/>
Last Name	<input type="text" value="Banfield"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text" value="Wootton and St Helen Without Neighbourhood Plan Steering Group"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan  
(WSHWNP) Steering Group

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

Paragraph	2.3 2.54 2.56 2.63 2.67 2.73 2.75	Policy	8b 13	Policies Map	
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4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4. (2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. (3) Complies with the Duty to Cooperate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

### WSHWNP Representation 2: Exceptional Circumstances

Paragraph 2.75 proposes that the release of land at Dalton Barracks by the MoD is a major change in circumstance, which is claimed to constitute the exceptional circumstances necessary to justify removing land from the Green Belt at and around Dalton Barracks, including the removal of the village of Shippon from the Green Belt. While we concur that the unexpected release of land at Dalton Barracks is a major change in circumstance in terms of the allocation of development, we do not accept that this change in circumstances is sufficient justification to delete land from the Green Belt: it does not establish the exceptional circumstances necessary for this. This is due to the significant proportion of the Dalton Barracks that is brownfield (previously developed) land, which VWHDC clearly acknowledges in Part 2:

- Paragraph 2.54 describes large areas of brownfield land on the Barracks site.
- Paragraph 2.56 comments on the sizeable extent of previously developed land in the development area.

- Paragraph 2.73 observes that much of the site is previously developed land.

The implications of this are threefold:

1. Core Policy 13 (bullet point vii) states that previously developed land within the Green Belt can be developed without having to remove its Green Belt status. VWHDC can therefore develop the previously developed land within the Dalton Barracks site without any change in the designation of land. There is therefore no need to remove land from the Green Belt in order for development to take place at Dalton Barracks.
2. The extent of previously developed land at the Dalton Barracks site, which VWHDC acknowledges, is more than adequate to accommodate the development proposed within the Local Plan period. There is therefore no need to remove land from the Green Belt in order to deliver the specific 'garden village' development planned at the Dalton Barracks site.
3. On p14 of Appendix A (the Site Development Template for Dalton Barracks) VWHDC claims that it will prioritise the reuse of previously developed land to make effective use of the land. As such land can be developed without changing its status under Core Policy 13, this prioritisation further strengthens the case against any asserted need to delete land from the Green Belt at or around Dalton Barracks.

In addition, the extent of previously developed land within the Dalton Barracks site is sufficient to provide for future, as-yet unspecified, development. Core Policy 8b states that a large part of the Dalton Barracks site will be retained within the green belt, which would not be the case if there was insufficient brownfield land to accommodate planned and future potential development. Specifically, the unexplained location of the proposed country park to the West of the site includes land that is brownfield, so VWHDC clearly does not expect to need all the previously developed land either for the current Local Plan period or for the 4,000+ dwellings that it estimates in paragraph 2.63 could be accommodated on the site in the longer term. Deletion of land from the Green Belt is therefore not even needed for the purposes of future-proofing.

The fact that the site has the capacity to accommodate 4,000+ dwellings does not mean that the site must accommodate 4,000+ dwellings: the number of dwellings appropriate for the site in the longer term should be determined by locally and objectively established need. Paragraph 2.67 references the Planning Inspector's previous advice against deleting land from the Green Belt when it is unclear if the released land would be needed for development in the future. Even if we were to accept that a development of 4,000+ dwellings would necessitate the deletion of some land from the Green Belt, the need for that level of development at the Dalton Barracks site has not been established. The recent downward revisions of the objectively assessed housing need figures for the current Local Plan period suggests that the current planned development for the Dalton Barracks site already contains within it a degree of over-supply, which undermines any longer-term arguments about the need to delete land from the Green Belt. Anticipating the allocation of higher levels of housing development - which might necessitate the removal of land from the Green Belt - to the Dalton Barracks site beyond 2031 is not only unjustified in terms of projected needs but also contradicts the VWHDC spatial strategy (outlined in paragraph 2.3), one 'main strand' of which is to focus strategic growth in the South Vale area, rather than the Oxford fringe. Any arguments that the deletion of land from the Green Belt at Dalton Barracks is necessary for the purposes of future-proofing are therefore unfounded.

The proposed deletion of land from the Green Belt at and around Dalton Barracks is wholly unnecessary both for the purposes of the current Local Plan and the provision of future development.

The argument put forward by VWHDC that a major change in circumstances for the allocation of development is equivalent to establishing exceptional circumstances for the deletion of land from the Green Belt sounds superficially self-evident. However, the specifics of Core Policy 13 that allow for the redevelopment of brownfield land within the Green Belt are conveniently overlooked by VWHDC, despite its repeated acknowledgement of the extent of previously developed land within the Barracks site. VWHDC uses the extent of brownfield land within the site to support its argument that the land should be removed from the Green Belt (paragraph 2.75), yet it is precisely the extent of brownfield land within the Dalton Barracks site that makes it **entirely unnecessary to delete the land from the Green Belt**. The proposal to remove land at Dalton Barracks from the Green Belt is therefore **unsound** as there is **no justification for the removal of land from the Green Belt** in order to develop the site, either in this Local Plan period or beyond. VWHDC commits to developing the brownfield sites first so there is **no need** to develop greenfield land up to 2031, and there is **no evidence** whatsoever that further development on such a scale as might warrant deletion of land from the Green Belt is going to be either necessary or appropriate beyond 2031. While the release of the Barracks site is a major change in circumstances to justify the allocation of development to the site outlined in Part 2, there are **no exceptional circumstances** for deleting land from the Green Belt at or around the Dalton Barracks site. The Council does not need to delete land from the Green Belt in order to develop the site, as the combination of its own Core Policy 13 and the extent of brownfield land within the site (which the Council acknowledges and says it will prioritise for development) allow the delivery not only of the ‘garden village’ proposed within the Local Plan period but also further development beyond this period. Any desire or intention on the part of VWHDC to develop any land at the Dalton Barracks site that has not been previously developed is wholly unnecessary and unjustified. **There are therefore no exceptional circumstances to justify deleting land from the Green Belt at and around Dalton Barracks, and the proposal to do so is unsound.**

(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.

Any reference to the deletion of land from the Green Belt at and around the Dalton Barracks site must be removed from the Local Plan 2031, as there is no need to remove this land from the Green Belt. As VWHDC acknowledges, there is sufficient brownfield land within the site to accommodate the proposed development and to provide excess capacity for further development in the future, and this previously developed land can be redeveloped without removing it from the Green Belt, under VWHDC’s Core Policy 13.

This would make this aspect of the Local Plan sound as it would be consistent with the VWHDC’s existing policies, would mean that the longer-term development of the site is rigorously established in accordance with local need rather than through spurious speculation, would bring the long-term development of the site into line with the Council’s stated spatial strategy, and would uphold the meaningfulness of the ‘exceptional circumstances’ test, protecting the purposes of the Green Belt.

(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.

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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**, 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 proposed deletion of land from the Green Belt at and around Dalton Barracks is a highly contentious issue locally. 96% of residents (primarily residents of Shippon and Whitecross) consulted by St Helen Without Parish Council on the development proposals for Dalton Barracks felt that it was not appropriate to remove any land at or around the Barracks from the Green Belt. On the one hand, VWHDC's stated intention to prioritise brownfield land for development is reassuring, but on the other hand, its efforts to remove such a vast area from the Green Belt without any justification for doing so, and in particular VWHDC's side-stepping of its own policies, are highly alarming, especially as we raised this issue in the previous consultation on the Local Plan. The potential implications of this for the scale and suitability of development, and associated loss of Green Belt amenity in the future are so concerning that the presentation of an alternative perspective in person is essential.

**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: **18 Nov 2017**

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Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

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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.

### 2. Agent's Details (if applicable)

Title	Dr	
First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
Organisation representing (where relevant)	Wootton and St Helen Without Neighbourhood Plan Steering Group	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.78  
2.81  
2.82

Policy

13  
35

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

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.

### WSHWNP Representation 3: Unsustainable Transport

Paragraph 2.78 states that the Council will continue to work with its partners to plan for future highway infrastructure improvements, but at the briefing meeting for parish councillors prior to the release of the consultation documentation VWHDC representatives explicitly acknowledged that infrastructure will never be delivered in advance of development as it is the development that provides the funding for the infrastructure. While this might accurately reflect the state of affairs, it also renders the entire process fundamentally unsustainable. Two specific transport proposals are highlighted here: the proposed A34 bus lane, and the proposed bus/cycle lanes between Dalton Barracks and Lodge Hill.

#### The A34 bus lane

Paragraph 2.81 lays out the intention to establish a single carriageway north-bound bus lane on the A34 between Lodge Hill and Hinksey Hill junctions, linked to the new development at Dalton Barracks via new bus and cycle lanes. This is intended to encourage more sustainable modes of transport by speeding up journey times from Abingdon to Oxford, but overlooks at least four factors:

- The Hinksey Hill interchange is already a major bottle-neck during peak hours, so increasing traffic into Oxford via this junction can only cause more travel problems. Any gains made in terms of shorter journey times from Lodge Hill to Hinksey Hill will inevitably be lost by the increased congestion at the Hinksey Hill junction. Speeding up only a short stretch of an otherwise congested journey will have a negligible impact on people's travel choices.
- Only a north-bound bus lane is planned, but traffic does not go only in one direction, and a quicker journey in only one direction will do little to encourage use of the Lodge Hill park and ride service if the return journey is less appealing.
- Expecting residents of the new development at Dalton Barracks to take a bus from the development to the Lodge Hill park and ride seems optimistic, given that this entails a change of bus part way through the journey, compared to the enhanced bus service that is proposed to serve the development, which would provide a direct service into the city. Such conflicts between different transport proposals suggests a lack of joined-up thinking and undermines the likely effectiveness of transport provision.
- During the preparatory work for the WSHWNP, the possibility of establishing a park and ride site at or adjacent to the new development at Dalton Barracks has been raised, which would be a more practical and sustainable location than Lodge Hill for residents of the new development and beyond. A park and ride facility at the Marcham Interchange, for example, would reduce car journeys from the new development as the park and ride would be closer to people's homes, and would be more accessible for existing and future residents of the strategic growth area to the south of the district, helping to relieve traffic pressure on the stretch of the A34 between the March and Lodge Hill interchanges. This would also mean that no new transport routes would be needed across the Green Belt between Dalton Barracks and Lodge Hill, as currently proposed (see below).

The proposed arrangements for enabling access from the new development at Dalton Barracks to Oxford via the new park and ride at Lodge Hill seems to have been developed on the basis of what seemed easy rather than what is most appropriate and most sustainable. The potential for directing Oxford-bound traffic along alternative routes, which would remove the need to develop new transport routes through the Green Belt, do not appear to have been considered. For example, sites to the South of the A34 already have permitted development allocated to them, so incorporating new transport options into these developments would seem a sensible place to start. As a result, these proposals are **neither justified nor sustainable and are therefore unsound**.

#### The new bus and cycle lanes

The land safeguarded for the provision of bus/cycle links between the new development at Dalton Barracks and the new park and ride at Lodge Hill is specified on p32 of Appendix A (the Site Development Template for Dalton Barracks) and referenced briefly in paragraph 2.82, although neither the location of this safeguarded land nor its Green Belt status are indicated in the text. There are two primary shortcomings with this proposal in terms of sustainability (although see also WSHWNP Representation 3a):

- These routes cut straight across Green Belt land that was deemed a priority for protection in the Hankinson Duckett Associates Green Belt Study 2017 commissioned as part of the preparatory work for the Local Plan. While the development of transport corridors on Green Belt land is allowed under Core Policy 13, the location of these routes is inconsistent with the aims of the Green Belt and contradicts the findings and arguments of the Hankinson Duckett Associates Study. This land (parcel 9 in the HDA Study) was evaluated as a 'high' performer in safeguarding the countryside from encroachment, was considered unsuitable for

development in visual and landscape terms as this would harm the openness and integrity of the Green Belt, and was judged to be vulnerable to erosion by encroachment. These routes will have a significant impact on the rural character of the Green Belt, and will serve as a locus for future development applications, which is likely to lead to further encroachment into an important and sensitive area of the Green Belt. Routes such as these might work reasonably well and be reasonably in keeping with the rural character of the Green Belt if they were confined to bicycles, but the proposal for these routes to serve buses is entirely inappropriate. The Local Plan provides no justification as to why it is necessary for these new routes to be located within the Green Belt, when services could be directed along improved existing routes or incorporated into other developments already planned in the area (e.g. to the South of the A34).

- In addition, these routes run more-or-less parallel to the A34, which itself runs more-or-less parallel to the 'ring-road' around the North of Abingdon. In effect, there is already a duplication of transport routes, and these new bus/cycle lanes will lead to triplicate transport routes. It is also easy to predict that the proposed route closest to Abingdon will quickly become targeted as the next town boundary for Abingdon. The Local Plan 2031 already relocates the northern boundary of Abingdon from the 'ring road' to the A34: the next 'obvious step' is to extend the town to the proposed bus lane at Sunningwell Turn, swallowing yet more Green Belt. This replication of transport routes and the damaging impacts on the Green Belt consequent to this cannot be considered sustainable and cannot be considered an appropriate use of Green Belt land.

Core Policy 35 undertakes to ensure that new development is located close to or along existing strategic public transport corridors, yet the new bus/cycle lanes will run parallel to existing infrastructure and will make no use of existing infrastructure. They will damage a priority area of Green Belt land and will encourage further encroachment in the future. The location of these bus/cycle routes is **neither evidence-based nor justified**, and does not appear to have been based upon a consideration of alternatives. The location of these routes is also **not sustainable**, due to the triplication of routes and the enhanced pressure that it will place on the Green Belt in the future.

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 practicality and suitability of directing traffic from the new development at Dalton Barracks to Oxford via the Lodge Hill park and ride should be reconsidered in light of alternatives that might make more effective use of existing and planned transport infrastructure. Clearer and stronger justification is needed to establish the sustainability of these plans. This would enhance the soundness of the Local Plan as it would take fuller account of the range of possibilities available and would make more effective and efficient use of the broader existing transport infrastructure beyond the A34.

The proposal to develop bus and cycle lanes across priority Green Belt land as the primary access route between the new development and Lodge Hill needs to be revised. While cycle routes might be appropriate in this Green Belt context, bus routes certainly are not. At the very least, these routes need to be confined to bicycles, especially in the absence of any

clearly articulated justification for the allocation of these routes. This would enhance the soundness of the Local Plan as it would reduce development impacts on the Green Belt both now and in the future, would be more consistent with the purposes of the Green Belt, and would thereby be more sustainable.

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

**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:

Both the Green Belt and transport are key local issues. With the detail of the new bus/cycle routes buried in the appendices of the Local Plan, it is likely that many local residents will not be aware of these proposals, so participation in the oral examination is important to ensure that these issues are fully aired.

**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: **18 Nov 2017**

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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.

### 2. Agent's Details (if applicable)

Title	Dr	
First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
Organisation representing (where relevant)	Wootton and St Helen Without Neighbourhood Plan Steering Group	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.78  
2.81

Policy

17

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

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.

### WSHWNP Representation 3a: Socially Unjust Transport

Paragraph 2.78 states that the Council will continue to work with its partners to plan for future highway infrastructure improvements, but the acknowledgement at the briefing meeting for parish councillors that infrastructure will never be delivered in advance of development results in a socially unjust situation, in which existing residents bear the brunt of the negative impacts of development for years before mitigation measures, let alone any service enhancements, come into effect.

The shorter-term adverse impacts warrant much greater consideration and mitigation provision in the Local Plan than is currently the case. The transport assessments and travel plans discussed in Development Policy 17 place excessive emphasis on new developments as insular entities and are only concerned about the new residents being able to access Oxford and Abingdon efficiently, with insufficient regard given to the ways in which enhanced services for new developments or settlements might work to the detriment of services in existing settlements. For example:

- Paragraph 2.81 outlines the intention to install a single carriageway north-bound bus lane on the A34 between Lodge Hill and Hinksey Hill junctions, linked to the new development at Dalton Barracks by new bus and cycle lanes (See also WSHWNP

Representation 3). However, Dalton Barracks is currently served by the no. 4 bus service, which will have to compete with the new service, with potential detrimental implications for services on the rest of the no. 4 route, possibly leading to a loss of services for Whitecross and Wootton.

- A similar situation arises on p15 of Appendix A (the Site Development Template for Dalton Barracks), which anticipates enhanced frequency of bus services for the new development – to premium standard – between Oxford and Abingdon, but there is no mention of protecting service frequency on the broader route, let alone using the opportunity of the new service to enhance existing provision elsewhere. If premium standards equate to more direct routes, then again Wootton and Whitecross will see their service reduced.
- Topic Paper 5 on transport and access poses a similar difficulty. This paper (p20) identifies the potential in phase 1 of the development of the Dalton Barracks site to ‘divert’ the existing bus service onto the Barracks site, but with no indication as to where/when on the route this diversion will take effect. If this diversion occurs at Long Tow, then there might be no impact on existing services but if buses divert via Honeybottom Lane and re-join the route at Long Tow, the whole of Whitecross will be bypassed, leading to a loss of service. Reassurance should be provided to existing communities that their own services will be protected and where possible enhanced through the transport infrastructure developments associated with new developments such as that at Dalton Barracks, rather than the focus solely being given to ensuring superior services for new settlements.
- It is likely that the proposal to develop new bus/cycle lanes across Green Belt land between Dalton Barracks and Lodge Hill (see also HSWHNP Representation 3) will see buses crossing Whitecross rather than running along it. This could also lead to Whitecross being omitted from the local bus network, and to a reduction in service for Wootton, with serious implications for residents.

The relationship between existing bus services and the proposed new transport facilities needs further careful consideration, and reassurance needs to be provided through the Local Plan that settlements currently served by public transport will not suffer as a result of service enhancements directed preferentially to the new development. There are serious risks with the current proposals that people - especially the elderly, the infirm, the young, and other groups who are not able to drive – will become socially excluded, with implications for both the economic and cultural viability of such settlements and for the credibility of any claims that the Local Plan is sustainable. Without due consideration of these potentially severe detrimental impacts on existing communities, these elements of the Local Plan cannot be considered to be anything other than **unjustified and unsustainable**.

(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.

VWHDC needs to make an explicit commitment in the Local Plan to the protection of local transport services such as rural bus routes. It is simply not acceptable to make ‘premium’ provision for future residents of new developments at the expense of existing residents. The Local Plan must make provision for social justice in the relative distribution of costs and benefits arising from the proposed developments, and must specify that transport assessments and travel plans must address the issue of how existing service standards will be maintained or enhanced.

This would make this aspect of the Local Plan sound as it would be developed on a more robust evidence base, and would justify more fully the claims made as to community involvement in the development of the Local Plan. It would also enhance the sustainability of the Local Plan, by protecting and hopefully enhancing the sustainability of the existing settlements that are covered by it.

(Continue on page 4 /expand box if necessary)

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

**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 local bus service is of key local concern, and the community has fought for some years not only to keep its service but to generate increased demand for it. We have been successful in this but an important factor in the demand for and provision of the no. 4 route has been the presence and support of Dalton Barracks. If the army are to relocate, their departure poses a significant threat to the viability of the bus service, and the proposals laid out in the Local Plan only compound that risk. VWHDC is not likely to be aware of the minutiae of the workings of the no 4 bus route, and I would not expect them to be, but the knowledge of the local community about the route, its significance and its vulnerability needs to be heard clearly if the risks inherent in the current proposals are to be avoided.

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Signature:

Date: **18 Nov 2017**

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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.

### 2. Agent's Details (if applicable)

Title	Dr	
First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
Organisation representing (where relevant)	Wootton and St Helen Without Neighbourhood Plan Steering Group	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.49  
2.53  
2.54  
2.56  
2.73  
2.75

Policy

8b

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

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.

### WSHWNP Representation 4: 'Dalton Barracks'

This Representation addresses the lack of transparency within the LPP2 regarding which areas of the 'Dalton Barracks' site are actually to be developed within the Local Plan period given the distinction between 'Dalton Barracks' itself and the neighbouring airfield.

LPP2 consistently refers to the whole of the site as 'Dalton Barracks' (for example, see paragraphs 2.49. 2.53). Although this reflects local colloquialism, it masks the fact that there are two distinct parts to the site: the barracks itself (behind the wire) and the airfield. The Government document A Better Defence Estate (2016) clearly states that these two parts of the site are being treated differently in terms of their disposal, with the airfield being available earlier than the Barracks, arrangements for the relocation of which remain uncertain. However, LPP2 conflates these two in paragraph 2.54, when stating that the site was original a military airfield but has more recently been used as a barracks. Given the difference in the availability of the two parts of the site, it would seem important to specify more clearly which areas are intended to be developed within the Local Plan period, as this

might have considerable implications for the deliverability of the proposed development. It also raises questions as to the robustness of the evidence base on which the proposals have been established, and the reliability of the consultation undertaken, especially with residents of Shippon who are most likely to be affected, if they were not clear as to which parts of the site are proposed for development at which points in time.

Relatedly, paragraphs 2.54, 2.56, 2.73 and 2.75 refer to the large proportion of the Dalton Barracks site that is brownfield land, which VWHDC commits to developing first. The location of the country park to the west of the site suggests that development will initially be focussed at and around the barracks itself (behind the wire). However, the uncertainty concerning the timing or even the fact of the relocation of the regiments currently based at Dalton Barracks makes this unlikely. In addition, the repositioning of the planned development further to the west following the Council's decision not to remove Whitecross and the fields between Whitecross and the military site from the Green Belt – a decision very much welcomed by the WSHWNP Steering Group – suggests that the development proposed within the Local Plan period is more likely to be on the airfield than at the barracks. The implications of this lack of clarity are significant. If the development proposed within the Local Plan period is to be located on the airfield rather than at the barracks, then the proposal to merge the new development with Shippon becomes nonsensical, as the barracks is a discrete settlement that would sit between and separate Shippon and the new settlement. The merging of Shippon with the new development is therefore **unjustified and undeliverable**, making this aspect of LPP2 **unsound**.

The lack of clarity and uncertainty regarding the availability of the barracks itself (behind the wire) also make it difficult to comprehend how master-planning can be undertaken for the site as a whole (Dalton Barracks and Abingdon Airfield). While WSHWNP Steering Group welcomes and supports the proposal to develop a garden village on the site currently used as both a barracks and an airfield, and welcomes the opportunity suggested by VWHDC to become involved in the master-planning for the new development, there remain concerns regarding the degree to which garden village principles will actually be applied given the insistence of VWHDC on merging Shippon with the new development, as well as regarding the deliverability of the project given the uncertainty and lack of clarity as to the availability of different parts of the site.

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 Local Plan needs to specify which parts of the combined Dalton Barracks and Abingdon Airfield site are proposed to be developed within and beyond the Local Plan period. This would make this aspect of the plan sound because it would provide greater transparency to enable more meaningful evaluation of the deliverability and appropriateness of the proposed development.

**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**, 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 proposed merger of Shippon with the new development at Dalton Barracks is a matter of great and strongly felt concern to local residents, due to its inevitable impacts on their small historic village. Many local residents also feel that VoWHDC is ignoring them. It is therefore important that a representative of the local community has the opportunity to speak for those local people who feel voiceless.

**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: **18 Nov 2017**

### **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.

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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.

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**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.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form 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](mailto:planning.policy@whitehorsedc.gov.uk)



**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](mailto: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	Dr	
First Name	Janet	
Last Name	Banfield	
Job Title (where relevant)		
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Address Line 1		
Address Line 2		
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## Part B – Please use a separate sheet for each representation

Name or organisation: Wootton and St Helen Without Neighbourhood Plan (WSHWNP) Steering Group

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

Paragraph

2.62  
3.230  
3.232  
3.233

Policy

8b  
45

Policies Map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

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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### WSHWNP Representation 5: Country Park

Core Policy 8b states that a substantial country park of at least 80ha will be located to the west of the proposed garden village development at and around Dalton Barracks.

Paragraph 3.232 recognises the positive effect that green infrastructure can have on people's physical health and well-being (although interestingly it makes no reference to the psychological benefits of green infrastructure), by providing access to nature, sport, play, recreation and social interaction. Paragraph 3.230 states that the VWHDC's Green Infrastructure Strategy sets out a vision for a multifunctional interconnected green infrastructure network, while paragraph 3.233 refers to Core Policy 45 on green infrastructure, which it says ensures that green infrastructure is appropriately designed and integrated into new developments, and helps to improve the function and linkages to other green infrastructure assets. While Core Policy 8b mentions footpath and cycle routes from the new development to Oxford and Abingdon, there is no mention of similar connectivity to other local settlements such as Wootton, Dry Sandford and Whitecross. This is hardly encouraging in terms of the local accessibility of the country park to anybody other than the residents of the new development. An isolated area of green infrastructure located solely to

the west of the new development is anything but appropriately designed and integrated, as it makes negligible contribution to a green infrastructure network and will do nothing to enhance accessibility to green space for anybody other than residents of the new development, as it will only be directly accessible to those who live immediately adjacent to it. Unfortunately, this makes any claims by VWHDC to support health and wellbeing for all its residents self-limiting, as VWHDC's attention seems to be directed solely towards new rather than existing residents. Paragraph 2.62 even explicitly states that the country park is intended for use only by residents of the new development:

*To provide a buffer between any proposed development on the site and the designated sites, the western side of Dalton Barracks should be retained as open space, in the form of a Country Park, which will also provide recreational open space **to residents of the site**. (emphasis added)*

This is in direct contradiction to the commitments made by VWHDC in LPP1, paragraph 6.116 of which says that everyone should have an accessible natural green space, while paragraph 6.117 commits the Green Infrastructure Strategy to consider opportunities to enhance access to green infrastructure and recreation in the Green Belt. It is unfortunate that LPP2 ignores the opportunity within the proposed garden village development to enhance access to green infrastructure and recreation within the Green Belt for existing as well as new residents. As suggested in the WSHWNP Steering Group's response to the first round of consultation on LPP2, converting the stand-alone country park currently proposed to be located to the west of the new garden village into a reconfigured country park that encircles the new development, allied with green corridors running through it, would enhance connectivity between the new development and existing settlements, would enhance access to this new green space for both new and existing residents, and would be more consistent with garden village principles by ensuring that the 'garden' runs through and around the 'village' rather than standing to one side of it and therefore not being part of the village at all. Reconfiguring the country park in this way could also be used to enhance the settlement gap between the new development and Shippon, thereby protecting the identity of this small historic village and enhancing the openness of the Green Belt in this area, and keeping LPP2 more consistent with VWHDC's own core policies (see also WSHWNP Representations 1, 1a, 1b).

The proposed location of the country park to the west of the new garden village development is **inconsistent with VWHDC's Green Infrastructure Strategy and Core Policy 45**, and is therefore **unsound**.

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.

VWHDC needs to give greater consideration to existing residents of settlements around the proposed development, in terms of minimising negative impacts on and maximising positive

opportunities for those residents, rather than focussing solely on what future residents of the new development will need. WSHWNP Steering Group welcomes the decision by VWHDC to retain Whitecross and the adjacent fields within the Green Belt following our response to the last round of consultation on LPP2, but there remain opportunities to do much more for the benefit of existing residents. The Local Plan should reconsider the form and location of the country park to ensure that access to green infrastructure is enhanced for existing as well as new residents, and should take this opportunity to use the country park strategically to meet other needs and aspirations of existing local residents, such as maintaining the distinctiveness of Shippon and its separation from the new development. A country park that runs around and through the new development would seem the optimal design for consistency with garden village principles, for accessibility to green infrastructure for all, and for protecting the character and identity of Shippon.

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Signature:

Date: **18 Nov 2017**

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