

Vale of White Horse LPP2 Examination

Statement from Wootton and St Helen Without Neighbourhood Plan Steering Group

Respondent Reference Number: 1095853

6th June 2018

Matter 5: Dalton Barracks

This Statement is submitted by the Steering Group for the Wootton and St Helen Without Neighbourhood Plan (WSHWNP) to reinforce and update our previous Representations on LPP2 in light of the significant progress made on the Neighbourhood Plan since those Representations were submitted.

The Presubmission Consultation on the draft Neighbourhood Plan is currently underway, and the Plan can be viewed at www.wshwnp.org. We aim to submit the final Neighbourhood Plan to the Vale of White Horse District Council (VWHDC) by the end of July 2018, within the Examination period for LPP2, and we will forward a copy to Ian Kemp for the purposes of the Examination when we submit it to VWHDC.

Our communities strongly support development at Dalton Barracks / Abingdon Airfield should the MoD vacate the site as it reduces development pressure on the Green Belt elsewhere in our Designated Area, it is a sensible use of the site should it become available, and it brings potential opportunities and benefits for our area. However, we also have concerns about the impact of the proposed development on the infrastructure, settlements and communities of our Designated Area, and our communities are very unhappy about the proposal to delete land from the Green Belt.

This statement concentrates on five questions (5.1, 5.2, 5.3, 5.4 and 5.6) as these are of greatest concern to our communities and they speak to other questions related to this Matter, enabling us to avoid duplication of material by targeting our attention to these questions.

We respond to all these questions within this statement, addressing each in turn.

5.1 *Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt, is the proposal to establish an inset to the Green Belt at Dalton Barracks justified by proportionate evidence in principle?*

5.1.1. The evidence the Council appear to rely upon is the Green Belt Review: Exceptional Circumstances Assessment; Dalton Barracks (NAT01 October 2017). At paragraphs 3.1.2 and 3.1.3 of the assessment, it relies heavily upon the principle for the review of the green belt being supported by the inspector who presided over LPP1 (paragraph 85 of his report – ALP03). We do not interpret the inspector's findings into LPP1 in that way at all. One important reason is that he was not able to consider whether in fact any area of land would have extensive previously developed land (PDL) associated with it. In addition, the fact the promoters' submissions would swamp Shippon village and destroy its identity has no regard to one of the principles for keeping land as green belt.

5.1.2. Topic Paper 2, site reference SHIP_A Dalton Barracks (Shippon) under the heading 'Sustainability Appraisal' states "Redevelopment would involve making best use of brownfield land, and it is understood that the greenfield part of the site could remain predominately open". This further supports keeping the land in the green belt.

5.1.3. The principle of the notion of a green belt review is therefore flawed. Development on PDL in green belt is acceptable in principle and there is no need for a green belt review to take place as a matter of course.

5.1.4. The WSHWNPSG does not therefore believe that this proposal is justified by proportionate evidence. Not only does LPP2 recognise the extensive presence of previously developed land within the development site (see, for example, paragraphs 2.54, 2.56 and 2.73), which can be developed to deliver the strategic aim of 1,200 dwellings within the plan period without any change in the Green Belt, but LPP2 also does not quantify the proportion of brownfield versus greenfield land within the site, which would be necessary to justify any deletion of land from the Green Belt in order to deliver the longer-term aspiration of 4,000+ dwellings. This has become an important issue for our communities during the development of the Neighbourhood Plan as the lack of clarity over the proportion of the site that is greenfield and brownfield and the distribution of these designations across the site makes it difficult for local residents to evaluate the likely impacts on them arising from the development.

5.1.5. The announcement of the release of this land by the MoD brings a new opportunity for development, but this does not constitute exceptional circumstances as LPP2 does not establish that the deletion of land from the Green Belt is necessary in order to meet either its strategic objective within the period of the plan or the VWHDC's longer-term aims, nor does it establish a need for 4000+ dwellings on the site into the longer term. The proposal cannot be supported by proportionate evidence because the VWHDC has provided no evidence of any need to delete land from the Green Belt. They have simply stated an intention to do so.

5.1.6. Suggested modification-

Delete any reference to removal of land from the green belt.

5.2 Is the detailed alignment of the proposed Green Belt inset boundary justified and supported by proportionate evidence?

5.2.1. No, it is not, for at least five reasons:

1. Proportionate development to meet local needs is already permitted in Shippon within the VWHDC's existing policies, so the removal of Shippon from the Green Belt is unnecessary to facilitate development in the village.
2. No evidence or justification have been provided as to the need for or benefits arising from merging Shippon and the new development.
3. The proposal to merge Shippon with the development at Dalton Barracks / Abingdon Airfield contravenes the VWHDC's own policies in LPP2 to protect the individuality and discreteness of settlements (Paragraph 3.226, 3.228 and Development Policy 29).
4. It also contravenes full Garden Village principles, which specify that such developments should not be add-ons to existing settlements but should be separate from surrounding settlements. LPP2 claims that the development will be a Garden Village yet fails to apply Garden Village principles to the development by merging it with Shippon to the south and having a boundary directly abutting properties in Whitecross to the north of the site. The Neighbourhood Plan seeks to rectify this by establishing green buffers at each end of the site, but it would seem more appropriate for the boundaries of the site proposed for deletion from the Green Belt to be amended to exclude Shippon, and to incorporate greater separation between existing settlements and the new development than at present. The Local Plan and the Neighbourhood Plan would then be consistent in this regard.
5. The proposal takes no account of the strength of local opposition to the removal of Shippon from the Green Belt. In addition to the consultation cited in our previous Representation on this matter, further consultation undertaken for the Neighbourhood Plan through a questionnaire sent to every household in the Designated Area revealed that 62% of all respondents were against the removal of Shippon and the airfield from the Green Belt. This is a clear majority in any event but given that the largest settlement in the Designated Area (Wootton) is already inset from the Green Belt and its residents might reasonably be expected to care very little about the similar removal of a different settlement, this is a significant majority. When only the responses of residents of Shippon are considered, this majority rises to 84%. This strength of feeling must be taken into account: there is no reason whatsoever to include Shippon within any proposed deletion of land from the Green Belt.

5.2.2. Suggested modification-

Delete all reference to removal of land from the green belt

5.3 *Is the housing allocation at Dalton Barracks appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Have these been adequately assessed? Are the detailed requirements in Core Policy 8b and the site development template requirements – both general and site specific – justified and would they provide an appropriate basis for preparation of a Supplementary Planning Document for the site?*

5.3.1. We have no reason to doubt the availability of sufficient previously developed land within the site to accommodate the 1,200 dwellings allocated for the period of LPP2, and our communities support this development. Our primary concerns regarding infrastructure and impacts are outlined elsewhere in this Statement.

5.3.2. The allocation of upwards of 4,000 dwellings to the site in the longer term is not firmly or fully justified. There has been no objective assessment of the need for housing in the Designated Area beyond the current plan period so there is no specific number of dwellings to accommodate. It is therefore questionable whether it can appropriately be called an allocation. The vague figure that is currently used seems to have been selected on the basis of the maximum number of dwellings that can be squeezed onto the site rather than considering what the area will need in the future.

5.3.3. In addition, the allocation of such a large settlement to the site is out of keeping with the character of the Designated Area, which is defined by small settlements. A settlement of 4,000 dwellings or more would be almost four times the size of the largest settlement in the Designated Area and would dramatically change the character of the area, contravening the commitments within LPP2 to protect the character of local areas, and the spatial strategy of the Neighbourhood Plan that seeks to protect the small scale and rural character of settlements in our Designated Area. Further, the allocation of such an extensive development in the Designated Area is inconsistent with the VWHDC's spatial strategy to target development in the Science Vale area.

5.3.4. Consequently, while we acknowledge that making efficient use of land is an important feature of sustainable development, the character of the Designated Area would be jeopardised by a development of this size, the need for such a large settlement has not been objectively established, and its proposed location is inconsistent with the spatial strategy of LPP2.

5.3.5. Our earlier representations expressed concern that the Council were not fully committing to protecting local services, such as rural bus routes. We would like to see a commitment in policy to not just maintaining rural bus routes but improving existing and exploring new bus routes as part of the Dalton Barracks development which will benefit the new community and also the existing community within the whole Designated Area for the Neighbourhood Plan.

5.3.6. Suggested modification-

Roman numeral (i) of policy 8b to read:

‘ the development is in accordance with the requirements of a travel plan for the whole site and the community within the surrounding area. The development will make the necessary reasonable contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling and other sustainable initiatives. The travel plan will amongst other things not only minimise the impact of the development upon transport but will explore improving existing and new bus routes. ‘

5.4 How would the proposal for Dalton Barracks relate to the existing community of Shippon? What new services, facilities and infrastructure links would be provided and is this realistic? Is the proposal viable? Would it comprise sustainable development?

5.4.1. LPP2 proposes to merge Shippon with the new development, contravening its own policies, Garden Village Principles and local wishes, as detailed above, but also radically transforming the character of Shippon. An independent Character Assessment commissioned as part of the Neighbourhood Planning process identified Shippon as one of three sites within the Designated Area already at risk of losing their character. The proximity of Dalton Barracks to Shippon does not mean that they are one and the same in either form or character. The military perimeters, built form, architecture and signage all establish a clear distinction between Shippon and Dalton Barracks. The proposed development brings an opportunity to reinstate the individuality of Shippon by increasing rather than decreasing the distinctiveness of each settlement and by enhancing their separation. This is what our communities say they would like to see happen, so the Neighbourhood Plan establishes an open, green buffer between Shippon and the new development. VWHDC listened to the views of residents of Whitecross and withdrew their original plan to merge the new development with Whitecross but has not listened to the same views from residents of Shippon. Given the strength of public feeling, the independent Character Assessment and the policies proposed within the Neighbourhood Plan, it would seem appropriate for Shippon's separation and distinctiveness from the development to be embedded in LPP2 and the SPD. The Local Plan and the Neighbourhood Plan would then be consistent in this regard.

5.4.2. Shippon needs a community centre and would welcome the provision of such a facility through the development, but this does not require the merging of settlements. A community centre could be provided in one of military buildings designated in the Neighbourhood Plan as Heritage Assets within the buffer between the two settlements, providing a valuable facility that integrates their communities, situated within a green space that protects their distinctiveness.

5.4.3. Residents of our Designated Area have indicated their concern that the sustainability of the new development can only be assessed if its impacts on surrounding settlements and communities is taken into account. This has been articulated in relation to two significant issues:

1. Facilities provided within the new settlement must be accessible for residents of surrounding settlements, especially medical facilities as Wootton has lost its GP surgery in recent years. The Neighbourhood Plan therefore emphasizes the need for sustainability appraisals to incorporate accessibility beyond the development itself.
2. Sustainability of the new development must not be at the expense of sustainability of surrounding settlements. Suggestions during early work on the master planning for the site that the no. 4 bus service would be diverted away from its current route would halve bus provision for Whitecross, which would be unacceptable for residents. The Neighbourhood Plan therefore proposes a route that protects the existing service for Whitecross.

5.4.4. Concerns over the impact of the development on the transport infrastructure of Shippon and the rest of the Designated Area were outlined in our previous Representations, including roads already at or approaching capacity; a lack of cycle paths, footpaths and street lighting making more sustainable forms of transport impractical; and specific issues around Barrow Road in Shippon. Any development that does not address these issues cannot be considered sustainable.

5.4.5. Promoting a development as a Garden Village does not make it sustainable. It cannot be sustainable if it destroys the character of its nearest neighbour, if it fails to service surrounding settlements, if it removes provision from surrounding settlements, or if the infrastructure is unable to accommodate it.

5.4.6. Suggested modifications-

Delete any reference to removal of land from the green belt.

Provide within planning policy a clearly defined buffer between the existing settlement of Shippon and any new development proposed.

5.6 Are the proposals to safeguard land for bus/cycle links between Dalton Barracks and the Lodge Hill Park and Ride site justified? Would there be any adverse impacts?

5.6.1. These proposals are not justified as it does not make sense to construct new roads:

1. when there is a clear need to improve existing roads, and the proposed development provides an opportunity to do so.
2. to provide access to a Park and Ride (P&R) site at Lodge Hill when there are also proposals to establish a P&R site at Cumnor, which could be accessed using existing roads.
3. to take people from the new development to the P&R at Lodge Hill when opportunities should be considered to provide a P&R adjacent to the development near the Marcham Interchange, which would ease pressure on stretches of the road network already under strain by taking traffic off the A34 earlier and away from both the B4017 and Barrow Road.
4. and provide new bus services solely for the benefit of residents of the new development, rather than ensuring that existing settlements, such as Wootton, Sunningwell and Whitecross, can also access the service.
5. that not only duplicate but triplicate existing routes to the north of Abingdon.

5.6.2. In addition, VWHDC proposes to establish a premium bus service between the development and Oxford, which would entail just one bus journey. It seems unrealistic to expect people to select to take one bus to the P&R at Lodge Hill, only to have to transfer to a different bus to complete the journey into the city instead of using the premium service. It does not make sense to construct new roads to provide an indirect bus service that will be less convenient than the direct bus service that will use existing roads.

5.6.3. The adverse impacts were summarised in our previous Representations, including the triplication of routes, the loss of Green Belt land that VWHDC's own commissioned study recognises as being of high value, and the inevitability of the new route prompting further encroachment into the Green Belt as a target for ribbon development. Further adverse impacts include the social injustice of providing new services for the new development but ignoring the needs of surrounding settlements to access the same services, imposing detrimental impacts of congestion, noise, pollution and safety concerns on existing communities but without the benefit of enhanced services by way of compensation. It is also a wasted opportunity to tackle known problems on the existing road network, which would be of benefit to all residents of both current and future settlements, and therefore has detrimental impacts on the sustainability of the proposed development.

5.6.4. Suggested modifications-

Undertake a study to assess the suitability of a Park and Ride at the Marcham junction with the A34 with a view to undertaking a main modification to policy.

Amend supporting text to reflect the above, such as paragraph 2.59.

Delete any reference to safeguarding land for bus/cycle routes between the new development and Lodge Hill.