



Down Ampney
Bendlowes Road
Great Bardfield
Essex
CM7 4RR



23 March 2019

Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
Abingdon
OX14 4SB

by email
planning.policy@whitehorsedc.gov.uk.

Dear Sir or Madam

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

On behalf of my clients, Arnold White Estates, I attach the completed form setting out my objections (based on soundness) to Modifications MM4, 5 and 6, with support for MM23.

Please acknowledge receipt and keep me advised of the next stages in the process.

Regards



Geoff Gardner MSc, MRTPI
Director
Gardner Planning Ltd.

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

Please return by 5pm on Monday 1 April 2019 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments

24.3.19

Part A

Are you responding as an: (please tick)

☒

Agent

☐

Business or organisation

☐

Individual

A name and contact details are required for your comments to be considered.

1. Personal Details

2. Agent Details (if applicable)

Title	<input type="text"/>	Mr
Full Name	<input type="text"/>	Geoff Gardner
Job Title (where relevant)	<input type="text"/>	Director
Organisation	<input type="text"/>	Gardner Planning Ltd (on behalf of Arnold White Estates Ltd)
(where relevant) Address Line 1	<input type="text"/>	Down Ampney,
Address Line 2	<input type="text"/>	Bendlowes Road
Address Line 3	<input type="text"/>	Gt Bardfield
Postal Town	<input type="text"/>	Essex
Postcode	<input type="text"/>	CM7 4RR
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

The Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications includes a series of changes to the published Local Plan. These suggested modifications have been recommended by the Planning Inspector and are considered necessary for the plan to be found sound.

The documents below are therefore being consulted on for a period of six weeks:

- Schedule of Proposed Draft Main Modifications
- Schedule of Draft Maps and Figures
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Statement re Proposed Draft Main Modifications
- Additional Air Quality Evidence
- Additional Transport Evidence

Please provide the relevant modification number or document to which your comment relates:

Proposed Modification Number / Document:

MM4

Please provide your comments below:

The modified plan at Core Policy 8a (and elsewhere) indicates that 1,200 homes are allocated for completion in the plan period which ends at 31.3.31.

Paragraph 2.54 confirms this although acknowledging that 'A Better Defence Estate' identifies that the MoD will begin to release land at Dalton Barracks in 2029. The paragraph goes on to say (emphasis added in bold) that *"Dialogue between the Defence Infrastructure Organisation (DIO) and the District Council has identified an opportunity to **release the site sooner than 2029** and the Council is satisfied that 1,200 homes can be delivered on the site within the plan period up to 2031."*

No date is given for this earlier release to verify the assertion that 1,200 homes can be delivered by March 2031.

Paragraph 2.55 includes *"Around half of the growth envisaged within the plan period can be delivered on site even before the military units are re-located. However, it is anticipated that the military units will be re-located no later than 2029"* (revised from 2026 in the submitted Plan). No explanation is provided of why the Council's assumption of land release has slipped by 3 years, nor (more importantly) of how this has no effect on delivery by 2031.

Even assuming that some 600 homes can be completed in the period before 2029 (it has previously been assumed by VWHDC that development could commence in 2025), and if the land of the military units is not available until January 2029, then the balance of some 600 homes must be constructed and completed in 27 months (a rate of 267 p.a.). This is much higher than the maximum delivery rate provided in the Statement of Common Ground between VWH and Carter Jonas (on behalf of the Defence Infrastructure Commission/MoD) (March 2018) and the generally recognised housebuilders rate of some 40 p.a. per outlet/builder (or some 120 p.a. assuming Dalton Barracks has 3 outlets/builders which would be typical for a 1,200 home development).

Release of MoD land is officially published regularly in a House of Commons Report. At the Local Plan Hearing in July 2018, when Dalton Barracks was discussed, the DIO (an agency of the MoD) representative accepted that any land release by the MoD was still showing in the HoC release as 2029. He explained this as a 'computer glitch' and assured the Inspector that it would be corrected in the next release which was anticipated to be 'soon'. The HoC data release of 15.11.18 does indeed amend the figure for the parcel '2057213 of 76ha with capacity for 1,200 homes', but only to 2028. In the 3.25 years to Jan 2028 to March 2031 this would require an annual rate of some 370 homes p.a., including the first year when site preparation would result in few homes being completed. Again, on the assumptions above, only some 400 homes are likely to be completed in these 3.25 years.

The modifications have rightly removed any mention of further development beyond 1,200 homes at Dalton Barracks not least because of lack of any evidence of necessary infrastructure. There is actually still no assessment or information on infrastructure required for 1,200 homes.

However, the Plan is strongly reliant on the 1,200 homes being delivered at Dalton Barracks, but the Modifications (including the slippage from 2026 to 2029 for land release) and lack of explanation or evidence for the assertion by the Council that 1,200 homes "*can be delivered on the site within the plan period up to 2031*" constitute an objection to MM4 because it is unsound not being 'justified' based on proportionate evidence.

Part B – Please use a separate sheet for each representation

Please provide the relevant modification number or document to which your comment relates:

Proposed Modification Number / Document:

MM4/MM5

Please provide your comments below:

It is entirely unclear which area is proposed for housing development. The revised 'Figure 2.3: Proposed site allocation boundary and Green Belt boundary at Dalton Barracks' (modified Plan p31, Schedule of Draft Maps and Figures Feb 19 p3) shows 'the proposed strategic allocation' edged red which excludes the area of the existing barracks buildings. It includes a substantial area on the western and northern boundaries which remains in the Green Belt (this is presumably the 'parkland' of 30ha in para 2.58 of the modified Plan).

Is the new development to be outside the existing barracks area? If so, what is the implication of excluding the whole of the existing barracks area from the Green Belt (also shown in MM27/MM5 Schedule of Draft Maps and Figures Feb 19 pp 16/17)? Is the barracks area proposed for any new development as part of the 1,200, in which case the 'red parcel' should be larger, and if not, is land being removed from the Green Belt for future development (as part of the larger development now deleted from the modified Plan) but with no specific proposals at this stage? If so, this does not constitute 'very special circumstances' and is unjustified. The Plan would be unsound not being 'consistent with national policy'.

Part B – Please use a separate sheet for each representation

Please provide the relevant modification number or document to which your comment relates:

Proposed Modification Number / Document:

MM6

Please provide your comments below:

The modification to Core Policy 12a deletes the requirement for a 'public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site', paragraph 2.75 as modified deletes "*a substantial sustainable settlement in its own right*" yet paragraph 2.76 still maintains the the development site is "*highly sustainable and significant site for development*". The requirement that the 'public transport and cycle link' is removed, and the contradictions between paras 2.75 and 2.76 need to be resolved - as it stands these modifications are unsound not being justified or consistent with national policy for sustainable development.

Part B – Please use a separate sheet for each representation

Please provide the relevant modification number or document to which your comment relates:

Proposed Modification Number / Document:

MM23

Please provide your comments below:

The modifications to Development Policy 39 are supported with the additional and higher qualifications included:

Development proposals that would lead to SUBSTANTIAL harm or TOTAL loss of significance of such remains will only be permitted in exceptional circumstances ...

Signature:

(this can be electronic)

Date:

24 March 2019

Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who will act as a point of contact between the Council, Planning Inspector and respondents. This means that you will be contacted by the Programme Officer (and where necessary the Council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the Planning Inspector and Programme Officer will be kept securely and not used for any other purpose. They will retain the data up to six months after the plan has been adopted. Vale of White Horse District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website, including contact details. If you would like to know more about how we use and store your data, please visit:

www.whitehorsedc.gov.uk/dataprotection

Future contact preferences

As explained above, in line with statutory regulations, you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. Vale of White Horse and South Oxfordshire District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for Vale of White Horse
- I would also like to be added to the database to receive planning policy updates for South Oxfordshire

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Alternative formats of this form are available on request. Please email planning.policy@whitehorsedc.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

Please return this form by 5pm on Monday 1 April 2019 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@whitehorsedc.gov.uk.