

Planning Policy
Vale of White Horse District Council
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28 March 2019

Consultation Response: LPP2 2031, Schedule of Proposed Draft Main Modifications (SPDMM)

Thank you for the opportunity to respond to the Schedule of Proposed Draft Main Modifications (SPDMM) for the VWHDC Local Plan Part 2, 2031 (LPP2), following the public examination of LPP2. The WSHWNP Steering Group is relieved to see that the proposal to safeguard land for bus and cycle routes between the proposed development at Dalton Barracks/Abingdon Airfield and the proposed Park and Ride at Lodge Hill has been deleted, and we are pleased to note the inclusion of provision to ensure the minimisation of impacts in terms of light pollution arising from the proposed development. However, we remain concerned that the consistently, robustly and expressly stated wishes of residents of both Wootton and St Helen Without parishes continue to be ignored, that the need for land to be deleted from the Green Belt (especially the village of Shippon) has not been established, that garden village principles are still not being applied in full, and that the proposal remains inconsistent with the settlement hierarchy and spatial strategy laid out in LPP1. In addition, we are concerned that the inconsistencies that have crept into the examination process do nothing to resolve the unsound nature of LPP2, and that there is growing evidence of a serious democratic deficit through the persistent neglect of resident and community wishes and the progressive exclusion of the community and their representatives by the VWHDC from the very processes through which they claim to be involving the local community. These concerns are explained in the paragraphs below and are supported by the supplementary documents appended to this letter:

- Our letter to the MHCLG to raise our concerns about the ways in which the VWHDC's application to the Garden Communities prospectus misrepresented both the level of our involvement in the proposal and the level and nature of our support for that proposal.
- Our response to the clarification questions posed by the Examiner for the WSHWNP.

Green Belt

Irrespective of whether LPP2 is being examined in relation to the NPPF 2012 or the NPPF 2018, the case for deleting Shippon from the Green Belt has not been established. Paragraphs 82 and 83 of the NPPF 2012 state that 'once established, Green Belt boundaries should only be altered in exceptional circumstances' and give as an example of such exceptional circumstances 'when planning for larger scale development such as new settlements or major urban extensions'. However, the proposed development cannot be an urban extension – major or otherwise – because Shippon is identified by the VWHDC's own settlement hierarchy in LPP1 as a smaller village where only limited infill is deemed appropriate. As 1,200 dwellings cannot possibly be considered limited infill, the new development must, by definition, be a separate settlement. Even if the land needed to develop the new settlement is to be deleted from the Green Belt, this should be separated from Shippon by designating a buffer between the two settlements, with both Shippon and the buffer remaining in the Green Belt to prevent encroachment and coalescence in the future.

Meanwhile, paragraph 136 of the NPPF 2018 states that ‘where a need for changes to Green Belt boundaries has been established through strategic policies...’. The strategic policies in LPP1 do not establish *the need for* changes to the Green Belt boundary, nor does the development proposal in LPP2 establish such need. LPP2 merely states the intention to delete land from the Green Belt: the exceptional circumstances cited by the VWHDC in (MM5, p11, para 2.75) do not establish the need to do so either to deliver the VWHDC’s accepted share of Oxford’s unmet housing need or to develop the land at Dalton Barracks and Abingdon Airfield. Similarly, the VWHDC has neither established nor evidenced that it cannot deliver this housing elsewhere, potentially negating the need to delete land from the Green Belt. The VWHDC has also not established that the land must be deleted from the Green Belt in order to develop housing on the site because by its own admission it considers the whole site to be brownfield, which can be developed while remaining in the Green Belt. Given the size of the site that the VWHDC initially intended to develop, there can be NO need to delete land from the Green Belt simply to deliver the 1,200 dwellings now allocated.

We support development at the site, but not the deletion of such a large area of land from the Green Belt. Our preference has always been that both the maximum quantum for that site and the scale of specific development allocations and proposals for that site should be calculated in accordance with its Green Belt status to ensure that the scale, density and nature of the development are in keeping with the settlement characteristics and wider environmental qualities of the locality within which it is to be sited. However, we acknowledge that the decision has been taken through the examination process to delete from the Green Belt sufficient land to deliver the housing allocated within LPP2. As such, our concerns now focus on the location of land proposed for deletion from the Green Belt, as detailed in the paragraphs below.

Merging Shippon with the new development

Despite the modifications made following the examination process, LPP2 remains in conflict with the strategic priorities laid out in LPP1. According to the VWHDC’s own settlement hierarchy, Shippon is a smaller village, in which the VWHDC’s own spatial strategy determines that only limited infill is permitted. 1,200 dwellings can in no way be considered limited infill. It is therefore inappropriate for the new development to be bolted onto or merged with Shippon, and the continued intention to do so contravenes strategic elements of LPP1 that will continue to apply following adoption of LPP2, rendering LPP2 both inconsistent with LPP1 (which it is intended to supplement, not replace) and **unsound**. The SPDMM consultation document states that it considers its proposals for the site at Dalton Barracks and Abingdon Airfield to be compatible with the spatial strategy set out in the Part 1 Plan (MM5, p11, para 2.75, bullet 3), yet the proposal to superimpose a development of 1,200 dwellings onto a village as small as Shippon flies in the face of this spatial strategy and the settlement hierarchy that underpins it.

This is reinforced by the statement in the SPDMM consultation document that the proposed development will provide services and facilities of a larger village. This is despite the fact that Shippon is defined in the VWHDC’s own settlement hierarchy as a smaller village and despite the specification in LPP1 of commitments to protect the identity and individuality of rural settlements, and to direct development towards larger villages and towns. Transforming a smaller village into a ‘smaller village plus a larger village’ will presumably turn Shippon into a small town: hardly consistent with either its own heritage or with the strategy and policies laid out in LPP1.

Consequently, LPP2 still cannot possibly be considered anything other than **unsound**. To resolve this situation, the proposed development should be delivered as a discrete settlement, separated from Shippon so that the proposals are brought into line with the settlement hierarchy and spatial strategy laid out in LPP1 and which are intended to direct the detailed proposals and additional sites in LPP2.

The SPDMM consultation document also specifies that the development site does not extend beyond the site of Dalton Barracks and Abingdon Airfield (MM5, p11 para 2.74), rendering the deletion of Shippon from the Green Belt doubly groundless, as further development within Shippon is clearly not intended to help deliver the new 1,200 dwelling allocation. The sole reason given for this proposed deletion of Shippon from the Green Belt is that the new development is intended to be an integrated and continuous settlement with Shippon (P11, para 2.74), yet Shippon residents have consistently, robustly and expressly stated that they do not wish to have their village merged with the new development. This view is enshrined in the WSHWNP and has been clearly communicated to the VWHDC at every stage in the development of LPP2, yet is ignored by the VWHDC despite their claims to involve the community in the emerging plans. The change in the terminology in the SPDMM consultation document away from describing the proposed development as a new settlement towards simply referring to it as development (MM4, e.g. p9 paras 2.49, 2.51) not only underlines the blatant disregard shown by the VWHDC for the expressed wishes of the community to be affected by the proposals but also highlights how the revisions to LPP2 have taken the proposals even further away from the wishes of residents, thereby exacerbating rather than moderating conflict between the VWHDC and the community. We are deeply disappointed by this, as we see no reason whatsoever why both the strategic objectives of LPP2 in terms of development and the community objectives of the WSHWNP in terms of settlement separation cannot be delivered simultaneously, and we cannot understand why the VWHDC persists in refusing to pursue this outcome as either the primary goal or a default position.

The new development is also described as being designed in accordance with garden village principles, however the development is *not being delivered* as a garden village, but as a garden urban extension. LPP2 therefore remains inconsistent between its description of the development and the planned delivery of that development. During the public examination of LPP2, the VWHDC claimed that the 2016 DCLG Garden Cities, Towns and Villages prospectus, which specified that a garden village should be a standalone settlement and not a bolt-on to an existing settlement had been superseded by more recent publications. This is true, but these later publications themselves adopt a clear distinction between garden villages – which should be standalone settlements – and garden suburbs or urban extensions – which can be bolted onto existing settlements (see for example TCPA, 2017, p6, which directly quotes the DCLG 2016 prospectus). The 2018 MHCLG Garden Communities prospectus also upheld this distinction by presenting two mutually exclusive options: a standalone garden settlement versus a transformational garden community. Any suggestion by the VWHDC that terms of garden village, garden suburb, garden urban extension and garden city are either interchangeable in discourse or synonymous in practice are spurious: they are not supported either by the TCPA or by the MHCLG. Consequently, any proposals that blur the distinction between different types of ‘garden’ developments must be considered **unsound**. To resolve this dilemma, the proposed development should be delivered as a standalone settlement that is separated from Shippon so that it is both rightly described as a garden village and appropriately delivered as such in conformity with this description.

Inconsistencies in examination

Unfortunately, the inconsistency that has crept into the examination process does nothing to resolve these difficulties. In the Inspector's post-hearings letter (dated 30/10/2018), the need for LPP2 to be consistent with LPP1 was explicitly stated, and it was specifically recognised that LPP2 must be consistent with the settlement hierarchy and spatial strategy laid out in LPP1 in relation to Blewbury (paragraph 4). The same need for consistency in relation to Shippon, however, seems to have been ignored, as the allocation of 1,200 dwellings to Shippon is wholly inconsistent with and flatly contravenes the strategic policies in LPP1, as detailed above. This situation must be remedied as it is indefensible and **inherently unsound** to apply a spatial strategy in such a piecemeal fashion. Shippon must be retained and protected as a smaller village and development should be allocated to Shippon and its environs in accordance with the strategy and policies laid out in LPP1.

Further, it was initially determined (letter dated 30/10/2018) that one option for the VWHDC would be to delete from the Green Belt only such land as is necessary for the delivery of 1,200 dwellings, in which case Shippon should remain in the Green Belt, but it was subsequently determined (letter dated 19/12/2018) that Shippon should also be inset to the Green Belt despite the downscaling of the development proposal by the VWHDC in accordance with the option suggested by the Inspector (MM Core Policy 13a). However, 'insetting' Shippon to the Green Belt will contribute nothing to the delivery of substantial future development as Shippon is a smaller village in which only limited infill is allowed. As this classification of settlement size and strategic stipulation of appropriate development is in no way dependent upon the Green Belt status of the village, removing Shippon from the Green Belt will change nothing in terms of the inappropriateness or **unsoundness** of the development proposed and is therefore a pointless exercise that achieves nothing but the unnecessary aggravation of residents.

These inconsistencies introduced to the examination process perpetuate the conflict between LPP1 and LPP2 noted above, perpetuate the **unsoundness** of LPP2, establish the examination process itself as potentially open to challenge, and perpetuates the acrimony between the VWHDC and the community/parish councils rather than resolving these issues. This situation is especially regrettable given that these issues could so easily be resolved rather than exacerbated through this examination process.

Democratic deficit

As detailed in the appended documents (our response to the clarification questions posed by the Examiner for the WSHWNP and our letter to the MHCLG about the VWHDC application under the Garden Communities prospectus) we grow increasingly concerned and frustrated by the lack of engagement, misrepresentation and exclusion directed towards the community, the parish councils and the NP Steering Group by the VWHDC, which has a duty to support the neighbourhood planning process.

We have engaged constructively with the VWHDC at every stage in the LP and NP processes and have requested very little by way of concessions. We were even commended by the VWHDC's own legal counsel during the public examination of LPP2 for the mature attitude that we had taken to the

development proposals, yet our expressly stated and robustly evidenced concerns and wishes have been repeatedly ignored, we have been excluded from processes that directly impact upon our settlements and communities, and we have been misrepresented by the VWHDC in their correspondence to the MHCLG about their ‘garden community’ application. If the intentions of the VWHDC are permitted to proceed in their current form, the examination process will not only be perpetuating the issues identified above but will also be condoning this dismissive behaviour by the VWHDC towards the community and parish councils, going against the spirit and intentions of the Localism Act 2011, and leaving both LPP2 and the examination process open to challenge.

A solution

The new development must be established, confirmed and delivered as a standalone settlement – separated from Shippon – so that garden village principles are applied IN FULL. This will ensure that the development described in LPP2 as a garden village is delivered in practice as a garden village and will bring the proposals in LPP2 into line with the community objectives of the NP, thereby delivering the objectives of both parties. It will also ensure that LPP2 is consistent rather than inconsistent with the settlement hierarchy and spatial strategy laid out in LPP1.

A strategic buffer must be established between Shippon and the new settlement to ensure that both settlements have their own identity and are clearly separated both visually and physically. This will further ensure that garden village principles are applied in full and will ensure that LPP2 accommodates the consistently and robustly articulated needs of the community, while also ensuring that LPP2 is consistent with LPP1. The WSHWNP proposes such a strategic buffer (p90) and with only minor additional amendments to the current boundaries of the proposed development site (MM4), both strategic and community objectives could be delivered. On the plan of the revised site boundaries, we calculate that the beige area allocated for development covers 47.42ha. Even at a density of only 30 dwellings per hectare, this allocation could deliver 1,422 dwellings. Such over-provision relative to the development required is a clear indication of capacity to secure a buffer for Shippon. Superimposing the WSHWNP strategic buffer for Shippon onto this plan would reduce the land available to 31.68ha, which would accommodate the required 1,200 dwellings at a density of 38 d/ha. Extending the proposed development site either to the West into the area allocated as parkland, or to the North, so that the development wraps around the built-up area of the Barracks site would provide for lower density development while still confining the development within the red line of the strategic development site. Retaining the buffer in the Green Belt would offset any encroachment of development into the area currently allocated as parkland, while locating Green Belt compatible land uses within this buffer could help to deliver the green infrastructure requirements of the development. This modification would easily accommodate both the community’s desire for a strategic buffer in the WSHWNP and the strategic development objectives of the VWHDC in LPP2, and would ensure that the land that is taken out of the Green Belt would be both available and intended for development. We are happy to be flexible in terms of accepting the deletion of *some* land from the Green Belt; all we ask is that the VWHDC also be flexible in providing a buffer for Shippon. There is simply no reason why Shippon should be denied or refused the separation that its residents demand when it can be delivered alongside and in conjunction with the strategic objectives of LPP2.

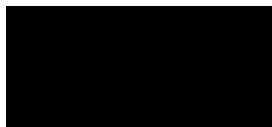
Finally, both Shippon and the strategic buffer must be retained within the Green Belt, to ensure that there is no risk of encroachment and coalescence between the two settlements in the future. Without such long-term protection, this risk is evidently considerable given the VWHDC's disregard for the community's wishes to date. Understandably, in view of our experience so far, we do not have confidence that the VWHDC will listen to or positively engage with the community when it comes to development that affects our locality and we therefore consider it an absolute necessity to protect Shippon's future by retaining both the village and its buffer within the Green Belt.

Conclusion

It is entirely possible for both the strategic objectives of LPP2 and the community objectives of the WSHWNP to be delivered simultaneously, and this could easily have been achieved if only the VWHDC had accommodated our consistently and strongly articulated opposition to the merging of Shippon with the new development, if only they had applied garden village principles in full to the new development in establishing it as a standalone settlement rather than bolting it onto an existing village, and if only they had ticked the box on their MHCLG application for a standalone settlement rather than a transformational community. In ignoring the expressed wishes and concerns of the community and parish councils in their proposals in LPP2, and in excluding these bodies from the application process for garden community funding, the VWHDC has wasted a rare and significant opportunity to bring the community along with it in planning, designing and developing a flagship garden village that everybody fully supported. Instead, they have alienated the community. It is entirely within the behest of the Inspector for LPP2 to resolve this issue, to bring LPP2 into line with LPP1, to ensure that the development described in LPP2 as a garden village is delivered as such, to protect the identity and separation of Shippon, and to deliver both the strategic objectives of LPP2 and the community objectives of the NP.

We would far rather the VWHDC finally saw fit to accommodate community concerns by providing separation for Shippon, but we have no expectation of any such consideration. We therefore strongly urge the Inspector for LPP2 to ensure that LPP2 is concluded in a manner that secures rather than undermines its soundness. This can be done by ensuring that LPP2 is made consistent with the spatial strategy laid out in LPP1 and the stated commitment to garden village principles in full by providing a buffer between Shippon and the new settlement and keeping both in the Green Belt, steps that would also conform with the spirit and intentions of the Localism Act and take participatory democracy seriously.

Yours faithfully



Dr Janet Banfield

Vice-Chair, Wootton and St Helen Without Neighbourhood Plan Steering Group.

Encs.

Letter to MHCLG concerning the VWHDC's application for garden communities funding.
Clarification response letter for the examination of WSHWNP.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

25 November 2018

To whom it may concern,

Vale of White Horse District Council's Application for Garden Community Funding

Please excuse the unsolicited nature of this correspondence, but I am writing on behalf of the Wootton and St Helen Without Neighbourhood Plan Steering Group (WSHWNPSG) to convey our concerns about the misrepresentation of our position with respect to, and our involvement in the production of, the application for funding under the Garden Communities Prospectus submitted by the Vale of White Horse District Council (VWHDC).

In their application under the Garden Communities Prospectus, VWHDC claim that our neighbourhood plan supports the development of a 'garden village' at Dalton Barracks and Abingdon Airfield if full garden village principles are applied to the development. This much is true, but what the VWHDC does not make clear is the difference in interpretation between the WSHWNPSG and the VWHDC regarding the definition of a garden village. We recognise the distinction drawn by both DCLG in the forerunner to the current prospectus (2016) and the Town and Country Planning Association in their online guides about garden villages (2017, 2018) between a garden *village*, defined as a stand-alone settlement rather than an extension of or a superimposition onto an existing settlement, and a garden *urban extension*, which can be added to an existing settlement. The VWHDC does not recognise this distinction but assumes that a new development superimposed onto the village of Shippon can properly be called a garden village. We disagree.

The application submitted by VWHDC for Garden Communities funding explicitly defines their development proposal as a 'transformational' garden community rather than a new, separate settlement. These are presented on the application form as two mutually exclusive options, and given the distinction that we draw between discrete garden villages and bolt-on garden extensions, it should immediately be clear that we would support an application for a garden community as a new, separate settlement but would not and do not support the application for a transformational garden community. The residents of Shippon do not want their village to be 'transformed'.

The VWHDC is well-aware of the opposition to the proposed merger of the new development with Shippon on the part of the residents of Shippon, St Helen Without Parish Council and the WSHWNPSG. We have consistently, robustly and expressly stated our opposition to this proposal in consultation on the VWHDC Local Plan Part 2 (LPP2), in both written representations to and oral participation in the Public Examination of LPP2, and in our own neighbourhood plan, which the VWHDC has seen, commented upon, and approved to proceed to publicity (now finished) and examination. It is also worth noting that prior to releasing the neighbourhood plan for the publicity period, the VWHDC pushed us to amend the wording of the policies in the plan that relate to the proposed garden village to bring them more into line with their own proposals. We resisted this pressure on all but very minor points, and this did not alter our fundamental and clearly articulated position with respect to the proposed garden village. For further information, the Wootton and St Helen Without Neighbourhood Plan can be viewed

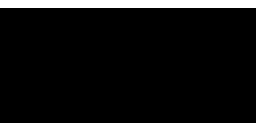
at www.whitehorsedc.gov.uk/sites/default/files/WSH SNP%20Plan.pdf. The relevant content on garden villages as discrete settlements can be found on page 24, and the relevant content relating to Shippon starts on page 37 (final paragraph) and ends with policies SS5.2 (Garden Village Principles) and SS5.3 (Separation of Garden Village) on page 39.

The application submitted by the VWHDC under the Garden Communities Prospectus also states that they are awaiting a response from the WSHWNPSG about their application, but this is also misleading as the VWHDC has not approached us about this application. The first we heard of it was at an extraordinary meeting of the Cabinet of the VWHDC, called to approve revisions made to the development at Dalton Barracks and Abingdon Airfield as proposed in LPP2 in response to the initial findings of the Inspector who is examining LPP2. Despite the significant implications of these revisions to our Designated Area, and the VWHDC's awareness of our acute interest in this matter, neither the WSHWNPSG nor its parent councils – St Helen Without Parish Council and Wootton Parish Council – were informed of this meeting, although other, less directly affected parish councils were. We found out about this meeting through alternative channels. At this meeting, the planning officer concerned undertook to liaise with the WSHWNPSG following the meeting, but a week later we still have not been contacted by the VWHDC about this application for Garden Community funding. We obtained a copy of this application through alternative channels. Unfortunately, this lack of communication is symptomatic of the lack of regard shown to the residents of Shippon, St Helen Without Parish Council, Wootton Parish Council and the WSHWNPSG, as evidenced by the VWHDC's insistence on pressing ahead with its proposed merger of the new development with Shippon in full knowledge that local people and their representatives strongly oppose this proposal. Equally unfortunately, the exclusion of the WSHWNPSG from any consultation on the application for Garden Community funding, despite the VWHDC's claims to the contrary, is precisely what has prompted us to compose this letter.

The VWHDC's application for funding under the Garden Communities Prospectus thus misrepresents the nature and level of support for the development of a garden community at Dalton Barracks and Abingdon Airfield. We would support an application for a new, separate settlement but we do not support a transformational garden community. The VWHDC has not approached us for our thoughts on their Garden Communities application, but they have submitted an application for a Garden Community of a form that they know we would not and do not support. As we have been excluded from the application process to date, and as the VWHDC has applied for a transformational Garden Community, which the VWHDC knows is not supported by residents and their representatives, we feel that it is important that those evaluating the applications are aware of the misrepresentation of the position and involvement of the WSHWNPSG with respect to the proposed development in the VWHDC's application under the Garden Communities Prospectus. We would therefore be grateful if this letter could be forwarded to the evaluation team.

Thank you for your consideration of these matters.

Yours faithfully,



Dr Janet Banfield

Vice-Chair, Wootton and St Helen Without Neighbourhood Plan Steering Group.

Clarification responses

Please find below the responses of Wootton Parish Council and St Helen Without Parish Council to the clarification note provided on 28th January 2019.

General - To what extent did the NP set out to supplement the detail in the submitted LPP2 (Core Policy 8b)?

The NP set out to supplement the emerging proposals in LPP2 to a significant extent, especially given the lack of site-specific detail in Core Policy 8b and the long-term perspective adopted beyond the period of the plan itself. While the NP covers the whole designated and addresses issues beyond those associated with the proposed development at Dalton Barracks and Abingdon Airfield, the scale of the proposed development is clearly of significant local interest and concern. We recognised the constraints on what a neighbourhood plan can achieve, and our communities broadly support development at the site. We do not seek to constrain development, but we do seek to inform decisions as to the level, nature and location of development that is appropriate for that site given the characteristics of and pressures on our neighbourhood and the aspirations and concerns of our communities. We have been actively involved in the consultation and Examination processes for LPP2, including workshops associated with the master planning of the site, and have requested very little by way of concessions, yet the community's perspective has not been accommodated. In this context, the NP seeks both to inform and supplement the emerging proposals in LPP2. Notably, The VWHDC submitted a note to the Inspector for LPP2 stating that "the Council does not consider the draft NP is of direct relevance to the examination of LPP2", reflecting the lack of regard shown by the VWHDC to the concerns of the community in developing LPP2, in contravention of the spirit and intentions of the Localism Act. We disagreed with this and SHWPC communicated this disagreement to the Inspector for LPP2, who – judging from his correspondence with the VWHDC - appears to be considering our NP in his deliberations on LPP2. Given that the Inspector for LPP2 has stated that his preliminary findings are 'without prejudice', such that the proposed modifications might be subject to further modification following consultation, there remains significant uncertainty as to the final content of LPP2 and its implications for the proposed development at Dalton Barracks and Abingdon Airfield. It is in this uncertain context that we seek to inform the emergence of proposals in LPP2. It is also in this context that we attended a supposedly 'informal' meeting with the VWHDC (which included their legal counsel), accompanied by our planning consultant (Nigel McGurk), in which Mr McGurk robustly countered the arguments of the VWHDC that we needed to make significant revisions to our NP.

Policy SS2 – to what extent were the strategic green gaps designed to provide a context for the emerging proposals on the DB site?

The strategic green gaps reflect both the value placed by local residents on the character of the neighbourhood area as a series of small, discrete and distinctive settlements in general terms, and concerns expressed during consultation on the NP by residents about the proposals in LPP2 to merge their settlements with the new development in a more specific sense. We have therefore taken a

strategic approach to settlement separation for the whole Designated Area, which takes specific form as it applies to the proposed new development. With regard to the application of this policy to the proposals for the DB site, these strategic green gaps seek to resolve several contradictions within the local plan, as follows:

1. LPP1 sets out policies to protect and enhance the separation and identity of settlements, but the proposals in LPP2 ignore this strategic context by seeking to merge the new development with Shippon. As LPP2 is described as being supplementary to LPP1 and providing detailed policies and additional sites rather than repealing established strategic policies in LPP1, the strategic green gaps seek to bring the proposals in LPP2 into line with the strategic policies in LPP1.
2. LPP1 identifies Shippon as a smaller village in its settlement hierarchy, within which its spatial strategy stipulates that only limited infill is permitted, but the proposals in LPP2 ignore this strategic context by superimposing a development of at least 1,200 dwellings onto Shippon. As the Inspector for LPP2 has described this as a large-scale development, it cannot possibly be considered infill. The strategic green gaps therefore seek to bring the proposals in LPP2 into line with the strategic policies in LPP1.
3. LPP2 describes the new development as a garden village but it is being enacted in its policies as a garden urban extension. The VWHDC claim that the distinction drawn between garden villages as stand-alone settlements and other garden-types of development that can be bolted onto existing settlements in the 2016 DCLG prospectus for garden cities, towns and villages has been nullified by more recent publications by the TCPA. However, these later publications themselves incorporate the distinction previously drawn, for example on page 6 of Practical Guide (1)(TCPA, 2017). This position is reinforced by the MHCLG 2018 prospectus for garden communities, which offers two options for funding applications – a stand-alone settlement or a transformational superimposition – as mutually exclusive options. The assumption employed by the VWHDC that the terms garden village, town, suburb, city and urban extension are interchangeable in discourse and synonymous in practice is therefore groundless. If it is to be described as a garden village, the new development must be delivered as a stand-alone settlement and must be separate from Shippon because this is how a garden village is defined. If it is to be described as an urban extension or suburb, then it must also be separate from Shippon because Shippon – by the VWHDC’s own admission – is a small village, not a town, and is therefore inappropriate to have urban extensions or suburbs bolted onto it. This is about more than semantics, as our communities have expressed their support for a garden village as a separate settlement but have expressed their resistance to the superimposition of a large new development onto their historic village. The application submitted in December 2018 by the VWHDC for garden community funding stated their express intention to impose a transformational development onto Shippon rather than deliver a stand-alone garden village. Despite knowing that our communities support the latter but not the former, the VWHDC stated in its application that they had communicated with us about their application and had our support for it. Neither of these assertions is true. The strategic green gaps therefore seek to bring the proposed development into line with our community’s expressed wishes, and to ensure that the description of the new development as a garden village is delivered as a garden village, as it is defined by the TCPA.

It is also worth highlighting that the land designated as a strategic green gap between Whitecross and the strategic site was originally allocated in LPP2 as part of the strategic site, but this was removed from the proposal following the identification of this land as a strategic gap between Whitecross and the new development by the DIO, who identified a revised perimeter for the eastern edge of the strategic site at a strong tree line. Our strategic green gap in this instance therefore formalises that which had already been acknowledged by the DIO and which was subsequently accepted by the VWHDC. The strategic value of this gap has been further enhanced by the Inspector for LPP2 who has determined that the land designated as an LGS behind Starveall Farm should neither be taken out of the Green Belt nor included in the strategic site. Our spatial strategy, including the strategic green gaps, applies a consistent approach across the designated area, which we therefore also apply between Shippon and the new development.

Policy SS3 – Would any of the LGSs that overlap with the strategic site conflict with the emerging proposals in LPP2?

There is no reason for there to be any conflict between the community objective for settlement separation and the strategic objective for the 1,200 dwelling development proposed in LPP2. We consider it to be entirely possible to deliver both objectives and we do not understand why this is not being pursued at present, as we have consistently voiced our community's concerns about the proposed merging of their village with the new development through the consultation and examination processes for LPP2, including at workshops on the master planning for the site. We have no wish to conflict with the emerging proposals in LPP2, but we do wish to inform them, and as LPP2 has not yet been adopted and does not specify where within the site different elements of the development (e.g. schools, homes, green space) will be located, this policy seeks to inform those decisions. This policy seeks to ensure that the development is delivered in a manner that reflects, respects and accommodates the concerns and needs of our community, by encouraging the protection of green amenity spaces between Shippon and the new development. We took a similar approach to the original proposal for the new development to be located immediately adjacent to Starveall Farm, at the top of Whitecross, which would constitute coalescence with this settlement. This was also designated as an LGS in the NP, and the Inspector for LPP2 has deemed that neither this site, nor the playing fields at Dalton Barracks (also designated as an LGS in the NP) are appropriate for removal from the Green Belt or for inclusion within the strategic site.

Have the parish councils separately assessed the additional local benefit of the proposed LGSs that are within the GB?

The parish councils have not undertaken an explicit assessment of the additional benefits of designating land within the Green Belt as a LGS. LGSs were identified across the Designated Area as a whole and have been specified irrespective of their location with regard to the Green Belt. This is partly to ensure consistency of approach across the Designated Area and between the parishes, but also in recognition of the desire on the part of the VWHDC to delete land (including Shippon) from the Green Belt and the possibility of these sites being subject to development as part of the strategic allocation. These LGS designations therefore cater for future possibilities.

Policy SS5.1 – would this policy restrict the emerging proposals in LPP2?

It has been assumed by the VWHDC and the site promoters that the entire site is PDL, so this policy makes no difference to the availability of land at the site. As the proposals in LPP2 commit to prioritising development at the strategic site on PDL, our policy to support only development on PDL at the proposed site makes no difference to the deliverability of the strategic allocation within LPP2. If, following the Examination of LPP2, this land is deleted from the Green Belt, the PDL designation would become null and void. If no land is deleted from the Green Belt, there would be sufficient space to accommodate the current allocation on the airfield, which is far more expansive than necessary for such a development. We therefore do not consider this policy to restrict the emerging proposals in LPP2.

Policy SS5.3 – on what basis was criterion a) developed and proposed? Has it been tested for deliverability/viability?

The answer to this question depends upon which criterion a) is intended. The original criterion a) (encouraging development in the centre of the strategic site) was removed prior to the publication of the plan, in discussion with the VWHDC and in relation to concerns over viability, so is no longer relevant (modifications are available on the VWHDC website). The revised criterion a) (to deliver an appropriate green buffer) was originally developed and proposed on the basis that:

- consultation feedback clearly and robustly indicated that Shippon residents did not want their village to be merged with the new development
- superimposing such a large development on a small village as proposed in LPP2 contradicts the settlement hierarchy and spatial strategy in LPP1 that stipulates that only limited infill is deemed appropriate in larger villages
- the proposal in LPP2 to merge the new development with Shippon contradicts the policies stipulated in LPP1 to protect settlement separation and identity,
- the proposal in LPP2 to merge the new development with Shippon contradicts the description of the new settlement in LPP2 as a garden village (which should be a stand-alone settlement and not bolted onto an existing settlement)

The revised criterion a) has not been tested by us as we have no reason to suspect that it would not be deliverable given the expansiveness of the site compared to the proposed development.

SEA Assessment/screening – Please comment on:

How they reached the view that the formal assessment frameworks are not necessary.

We reached the view that the formal assessment frameworks are not necessary because the assessment frameworks themselves indicated that they were not necessary, as outlined in pages 3-5 of the Screening Opinion, which was subsequently tested and confirmed by reviewing our policies as outlined in pages 9-13 of the Screening Opinion. The Screening Opinion was produced by a member of the NPSG who has both professional experience in aspects of

environmental management and is a member of the Institute of Environmental Management and Assessment, while our Basic Conditions Statement was produced by Nigel McGurk, who confirmed in our BCS that we had met the necessary requirements. In addition, our conclusion that we did not need to conduct either a SEA or an HRA has since been confirmed by both statutory respondees to our Screening Opinion and the VWHDC.

How they came to the conclusion that there would be no significant effects without the usual assessment of policies and environmental characteristics?

We took our lead from the regulations and the guidance provided for neighbourhood planning teams, as outlined in pages 3-5 of the Screening Opinion. As we make no allocations for housing, retail or employment, an SEA is not required and significant effects are unlikely, especially as we have no policies that relate directly or indirectly to Cothill Fen or that are likely to impact adversely on the local environment, meaning that an HRA is also not necessary. Nevertheless, we did take into account information about environmental characteristics, as outlined in the introduction to the NP and pages 3-5 of the Screening Opinion, and we undertook two reviews of our policies: one to inform the statement as to how we help to develop sustainable development embedded in the Schedule of Policies, and the other to test the expectation above that our policies would have no significant effect in the Screening Opinion. As most of these policies are not site-specific and any site-specific policies are designed to respond to the large-scale development proposed at Dalton Barracks and Abingdon Airfield, which itself is not yet clearly defined but which will be governed by its own SEA and HRA requirements, there are no grounds for establishing significant effects arising from our NP policies. These policies, in setting principles, are found to be generally supportive of the environment and sustainability, with no significant effects identified.

How they took account of the comments received from the statutory consultees in preparing the screening opinion

The comments we received acknowledged that they accepted that SAE and HRA were not required, therefore no further action was needed.

Request for information – composite contextual map.

Please find accompanying this response a composite contextual map, as requested. At present, the LGSs and Strategic Green Gaps are all indicated as LGS in the legend. We are currently awaiting provision of an annotated version to distinguish between the individual LGSs and Strategic Green Gaps, and we will forward this as soon as we receive it.

Representations

SoS for Defence

We acknowledge that the SoS for Defence has raised concerns about our NP, but we do not consider these to have merit. We are also mindful that these comments were provided by Carter Jonas, an

organisation with considerable financial interest in the development of the site. We are not conflicting with the strategic objectives of LPP2, as we do not consider the deletion of land from the Green Belt to be a strategic matter: indeed, the NPPF prioritises protection of the Green Belt so the VWHDC could not reasonably have a strategic aim that contravenes this; deletion of land from the Green Belt can only ever be a practical means to a strategic end (in this case, of developing housing). The assertion that the NP does not pay due heed to the strategic development site is fatally undermined by the emphasis within the NP on that strategic development site, supporting development at the site both within and beyond the plan period. Our case for ensuring the separation of settlements in our area is robustly evidenced through the character assessment and consultation on the NP, despite not in fact requiring such evidence as the VWHDC's own strategic policies in LPP1 stipulate that separation between settlements should be protected and enhanced. The difficulty here does not lie in the distinction between the NP and LPP2 but the contradiction between LPP1 and LPP2. Our NP seeks to rectify this deficiency in the local plan. Our case for the implementation of full garden village principles is part and parcel of this approach to settlement separation and is attentive to specificity in the TCPA's definitions of garden-type developments that those in favour of superimposing the new development onto Shippon against the express wishes of its residents choose to ignore. We therefore refute any claims that the NP is not in conformity with the strategic objectives of LPP2, that the evidence base is not robust, that our approach to settlement separation is not justified, or that our NP is premature: we are explicitly seeking to influence the sizeable development proposed for our area so that it reflects more closely the character of the area within which it is to be located, accommodates the needs and concerns of the communities who will be affected by it, and delivers sustainability for existing settlements and communities as much as for the new development itself.

VWHDC

We welcome the acknowledgement by the VWHDC of the commitment and energy invested in the NP by the local community, and the confirmation from the VWHDC that our NP does not require either an SEA or an HRA. We note that the VWHDC refers to its response to the pre-submission consultation process, although this response was not received until some days after the end of the consultation period. We further note that the VWHDC considers there to be inconsistency between our community objectives and the council's strategic objectives, but we do not consider the NP to conflict with these strategic objectives as we consider it entirely possible to deliver both community and strategic objectives. We do disagree on the deletion of the Green Belt but we consider this to be a practical matter rather than a strategic objective: the strategic objective is the delivery of 1,200 dwellings within the plan period, which we fully support. We also support the longer-term objective to deliver a larger development at the site and, while we do not seek to constrain development at that site, no quantum of development has yet been calculated for the site, nor has any formal allocation been made beyond the plan period. There is therefore nothing to constrain post-2031. While we acknowledge that some people consider it premature to develop a NP in parallel to a local plan, it is important to us that we can inform factors such as the calculation of the ultimate quantum for development at the site. It is important to us that this development is in keeping with its surrounding environment, in terms of scale, sustainability and community concerns, and not driven purely by maximising profits for developers. It is also important to us that the development is delivered as a proper garden village that stands alone from Shippon: this is the single most important concern for our communities. It would have been lovely to be able to work in partnership

with the VWHDC to plan for and develop a garden village that delivers both the strategic objectives in LPP2 and the community objectives in the NP, yet despite our consistent articulation of community concerns, we cannot discern any meaningful provision of a buffer between Shippon and the new development in the proposals for the strategic site. The VWHDC's application for government funding to impose a transformational garden development onto Shippon, rather than deliver a stand-alone garden village that contradicts our stated position, further indicates that no such buffer will be provided by LPP2.

Pye Homes

We acknowledge the concerns expressed by Pye Homes about the NP that they consider impede their development and economic aspirations, but while a NP must incorporate a presumption in favour of sustainable development, it is not a requirement of a NP to act as a vehicle for any and all specific development agendas. We refute the claim that we have applied blanket restrictions on development; instead, we have identified specific sites within our designated area that local people consider important to retain as green space for locally-strategic reasons. We also refute the claim that our policies are not in conformity with the development needs in the area, as the strategic site at DB is intended to meet these development needs and we support development at that site. We further refute the claim that our NP does not incorporate a presumption in favour of sustainable development: we do uphold the presumption in favour of sustainable development but we do not fall into the developer's trap of presuming that all development is sustainable. We have formulated a locally-informed approach to sustainable development, a significant feature of which is the protection of the character of the area as defined and valued by our communities. Finally, we refute the claim that we have not established a robust evidence base, as we have invested considerable time, effort and resources into securing as extensive and substantive an evidence base as possible and have gone well beyond the basic need for proportionate evidence.

Any others

- We are grateful to everyone who took the time and effort to consider our NP and provide their considered response to it.
- We welcome the support for the NP that has been articulated by residents' responses, and we support the requests for the designation of additional Local Green Spaces.
- We are happy to incorporate any revisions to wording or maps that are deemed necessary through the Examination process, although we are also keen to ensure that the plan does not become unwieldy or inaccessible for residents.
- We acknowledge that developers would like us to allocate additional sites and that further development proposals could support the provision of facilities such as a medical centre but given the scale of the development proposed for the DB site, we anticipate such facilities to be forthcoming through that development.

If the Examiner would find it helpful, we would be very pleased to attend a meeting between the Examiner, NP Steering Group and LPA, to clarify any point or matter.