

David Churchouse

15 March 2019
Planning Policy Team,
VWHDC
135 Eastern Ave,
Milton Park,
Abingdon,
OX14 4SB

Dear Sir/Madam,

Local Plan Part 2 (LPP2) Main Modifications Public Consultation.

I first wrote with reference to the public consultation on 20th and 24th April 2018. Save where the comments I made in April have been met by changes to the Publication Document and further amendments [for example Whitecross and the Shippon Sports Ground now remaining in the green belt] I stand by my previous comments.

Having read the proposed amendments now suggested by the Inspector and wholly accepted by VWHDC I am disappointed to see that the village of Shippon will be inset to the Green Belt: - therefore removed from the protection of being washed over by the Green Belt. I am further horrified to see that the Inspector suggests at CP13a 2.74 that "Shippon and the existing (What existing - as development has not yet commenced as the Local Plan has not been made) and proposed development at Dalton Barracks is inset to the Green Belt as it will form **an integrated and continuous settlement** albeit protecting as far as possible the existing character of Shippon."

I strongly Object to this proposal and the smaller village of Shippon should remain in the Green Belt.

Furthermore, in a letter to the VWHDC on 30th October 2018 the Inspector questioned the soundness of LPP2 saying there was a lack of unambiguous data to support a large

development of up to 4,500 dwellings at Dalton Barracks. He stated that soundness could be achieved by limiting the development to 1,200 dwellings with **Green Belt designation deleted from the site(s) concerned and no more. That statement inferred that Shippon, which is not part of the development site, would remain in the Green Belt.** Why then, in his letter of 19th December 2018 did he appear to change his mind and say that Dalton Barracks and Shippon will together form an integrated and continuous settlement and be removed from the Green Belt? No explanation has been given for these contradictory statements and in my view, along with other conflicting statements, the modifications effecting Shippon now under review are not sound. The reasons for reaching this view are as follows:

- 1) Shippon is designated as a smaller village in the VWHDC's own settlement hierarchy in LPP1 and currently continues to be referred to as a smaller village in LPP2 and therefore enjoys the protection of being washed over by the Green Belt, as such and in accordance with NPPF directives, new development is restricted to limited infill only. 1,200 new dwellings can not be described as limited infill as, currently, there are just under 400 dwellings in Shippon Village made up of private and Army dwellings. To add 1,200 new dwellings would increase the size of the village by 300%.
- 2) As a Green Belt smaller village, the historic and rural setting, the openness and character of Shippon is protected against inappropriate development which, by definition, is harmful to the Green Belt. It is also protected against urban sprawl by keeping land permanently open between it and any future development so its character is maintained. Inappropriate development will not be approved except in **very special circumstances**.
- 3) Further, Green Belt boundaries once established, which they are here, should only be altered where **exceptional circumstances are fully evidenced** and justified through the preparation and updating of plans. Before concluding that exceptional circumstances exist to justify changes to the Green Belt Boundary the VWHDC must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development; in this case 1,200 dwellings by 2031. Part of that strategy is to make as much use as possible of suitable brownfield sites and underutilised land.
- 4) The Dalton Barracks site (which includes all of what was the airfield of RAF Abingdon) is brownfield land. Hansard records an answer in the House of Commons made by the Planning Minister in November 2015 that, "airfields are *all considered brownfield land in planning terms; despite the fact that they are mostly undeveloped grassland*". The whole Dalton Barracks site covers some 290 hectares. The Army operational area is 90 hectares and the proposed country park on the site has been reduced to 30 hectares. This leaves 170 hectares for possible future development. The average density per

hectare is currently 45/50 in the UK and rising but even at a very modest 35 per hectare the airfield would support up to 6,000 dwellings. This is substantially more than the 1,200 required by 2031 and, even after potentially a further 4000 plus dwellings beyond this date, there is sufficient land available at Dalton Barracks to meet the VWHDC's identified need.

- 5) There are, therefore, **NO exceptional circumstances to alter the Green Belt boundary to exclude Shippon** as the VWHDC has sufficient brownfield land on the Dalton Barracks site to meet all its development needs. Furthermore, the VWHDC must give substantial weight to the harm to the Green Belt. Very special circumstances will not exist in this case as there is sufficient land on the airfield and such a development is inappropriate in the Green Belt. Shippon can remain in the Green Belt and the VWHDC can meet their development needs on the Dalton Barracks site. **The decision to remove the smaller village of Shippon from the green Belt is unsound and fails the tests of appropriateness as set out in NPPF regulations.**
- 6) Right from its first publication LPP2 has consistently described the new development/settlement as "following Garden Village principles" see CP8b, and "incorporating Garden Village principles" see para 2.57. By definition a Garden Village should be a stand alone settlement and not joined in any way to an existing settlement. This definition should not be confused with the terms Garden Suburbs, Garden City or Urban Extensions which are different types of development and can be joined to existing settlements. These terms are not interchangeable. At para 2.74 of the LPP2 modifications, by describing Shippon and the Dalton Barracks development as an integrated and continuous settlement, it contradicts the Garden Village Principles as set out in other paragraphs and makes LPP2 unsound.
- 7) When LPP2 was first announced a great swathe of the Green Belt was highlighted to be inset. I asked Mr Adrian Duffield, VWHDC Head of Planning, at one of the first public meetings held in Wootton and Dry Sandford Community Centre why most of the airfield, Dalton Barracks, Whitecross and all of Shippon Village needed to come out of the Green Belt: he had no satisfactory answer, just, "it was easier for the Vale to do it that way." Since then various areas have been removed from the inset and remain in the Green Belt. Indeed, even Shippon was removed from the inset by the Vale on 20th November 2018 as they could still archive the required development at Dalton Barracks with Shippon in the Green Belt. The VWHDC were not worried one way or the other if Shippon was inset or not and were very surprised by the Inspector's unexplained U turn in his letter of 19th December 2018.

- 8) The residents of Shippon have supported the development on the Dalton Barracks site right from the start, recognising the need for housing and the appropriateness of the site as long as sustainable development with timely and supporting infrastructure is developed side by side. Those residents have also made it quite clear at public meetings in the Village and in answers to the Wootton and St Helens Without Neighbourhood Plan Questionnaire that they want Shippon to remain in the Green Belt and be separate from the new development at Dalton Barracks by some form of open space or Buffer Zone. Thereby retaining the openness and permanence of the Green Belt to protect the character and setting of Shippon. It would seem that neither the VWHDC or the Inspector have given any consideration to the views of the residents despite the Localism Act 2011 having been enacted for that very reason. That too must challenge the soundness of LPP2.
- 9) In his letter to the VWHDC of 30th October 2018 the Inspector asked for more information in an attempt to make LPP2 sound. One such document, the 4th version dated 30th November 2018, was a transport delivery report prepared on behalf of the Defence Infrastructure Organisation (DIO) for the VWHDC. That document is very worrying to every Shippon resident as it proposes using the old Faringdon Road as the main road into and out of the new development of 1200 dwellings (and more beyond 2031) on the southern part of the airfield as well as having to take the existing traffic that comes through Shippon every day. The village roads cannot cope now with the volume of traffic a peak times and there are some unrealistic proposals to relieve Barrow Road of through traffic but all this does is shift the problem from one road in the village to another, it does not solve the problem.
- 10) Ignoring, for a moment, the soundness of this report the only way it could be done is if Shippon was removed from the Green Belt. The building and upgrading of the existing road into a major road with carriage widening, cycle and footpaths through a Village currently washed over by the Green Belt is inappropriate development. There are no, “very special circumstances” to support this construction as it links two separate settlements (the new development on the Dalton Barracks site and Abingdon Town) which are both outside the curtilage of the village. Also, there are other possible routes such a road could take which would not come through the historic and oldest part of the village. It seems this plan has been hastily drawn up on a low-cost option rather than on sound planning principles in a shabby attempt to get LPP2 made. I believe it is unsound.

To summarise it is entirely possible for the VWHDC to meet their housing needs at Dalton Barracks yet, at the same time, meet the needs of the local residents and keep Shippon in the Green Belt.

Yours faithfully,

David Churchouse.