

144 Whitecross
Oxfordshire
OX13 6BT

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

03 May 2017

Dear Sir/Madam,

**Vale of White Horse District Council Local Plan 2031
Part 2 Public Consultation**

Please find below the response of the Steering Committee for the Wootton and St Helen Without Neighbourhood Plan (SCNP) to the public consultation on the Vale of White Horse District Council's (VWHDC) Local Plan 2031, Part 2. The Part 2 document proposes that the anticipated release of Dalton Barracks by the Ministry of Defence (MoD) establishes exceptional circumstances to delete land at and surrounding the Barracks site (parcels 1, 2 and 3 in the Hankinson Duckett Associates (HDA) Green Belt Study) as well as the settlements of Shippon and Whitecross from the Green Belt, and the subsequent development of parcels 1, 2 and 3 to help meet Oxford City Council's unmet housing need. The SCNP supports and welcomes VWHDC's strategic aim to develop the Barracks site and the proposed application of 'garden village principles' to the new development, but disputes the proposed need to remove land from the Green Belt. The SCNP concludes that there are no exceptional circumstances to justify deletion of land from the Green Belt for three primary reasons: deletion of land from the Green Belt is not necessary to achieve the strategic aim of developing the Barracks site; the scale of the proposed development is inappropriate given the adopted policies in Part 1 of the Local Plan 2031 and the intention to apply 'garden village principles' to the new development; and the size of the site that is proposed for deletion from the Green Belt is excessive relative to established and likely housing need. Each of these concerns is addressed in turn.

Deletion of land from the Green Belt is unnecessary

The land that is currently owned by the MoD does not need to be deleted from the Green Belt in order to develop that land for housing, as Core Policy 13 in the Local Plan 2031 Part 1 already permits the development of previously developed land in the Green Belt. As previously developed land, the Barracks site can be redeveloped for housing under existing Local Plan policies, without removing any land from the Green Belt. The SCNP therefore supports the proposed development of the Barracks site but rejects the proposed need to delete land from the Green Belt in order to do so.

The scale of the proposed development is inappropriate

The stated long-term aim of VWHDC in relation to this site is to develop a new settlement on the scale of a larger village, which would stretch from (and include) Shippon across the existing Barracks site and adjacent fields to (and include) Whitecross. It is currently anticipated that up to 3,000 dwellings could be accommodated on that site. This would impose upon Shippon a settlement approximately five times its current size and impose upon Whitecross a settlement ten times its current size, and would eliminate the detachment and distinctiveness of both pre-existing settlements. This contravenes the Local Plan 2031 Part 1, which claims to deliver proportionate development that protects the

character and setting of rural settlements and which establishes policies that permit only limited infilling in smaller villages (Shippon) and no development whatsoever in open countryside (Whitecross). It also contravenes the 'garden village principles' that VWHDC seeks to apply to the new development, which stipulate that garden villages should be self-contained settlements, not 'add-ons' to existing settlements. The SCNP therefore supports the proposed development of the Barracks site providing that it is contained within the Barracks site itself and respects both the character and rural setting of the existing settlements, and the existing relation, distance and green space between those existing settlements. This would be more consistent with the VWHDC's stated policies in Part 1 and its stated intentions with regard to 'garden village principles' in Part 2, and would also be more consistent with the former Local Plan's identified Major Developed Site at the Barracks, providing a stronger sense of continuity in the planned development of the area.

The size of the site proposed for deletion is excessive

The Local Plan 2031 Part 2 anticipates using the identified 288ha site around the Barracks to accommodate future housing need beyond the period of the current plan, but this anticipated need has been neither established nor quantified. Given the size of the MoD site, this site alone provides capacity for housing development over and above that needed for the current plan period, accommodating future unknown needs without the need to release land from the Green Belt. Concentrating development on Green Belt land around the Barracks also ignores the likely availability of alternative development sites outside the Green Belt to cater for future housing need, such as the land to the South of Abingdon that is already safeguarded for transport infrastructure, which would bring alternative opportunities for housing development. This safeguarded site is also more sensibly located in relation to the major development planned around Didcot, which is likely to fuel commuting to the South of the district rather than reinforcing current dominant commuting flows to and from Oxford. The scale and location of the proposed development site around the Barracks are inconsistent with the VWHDC's own intentions for major economic development in the South of the District. The SCNP therefore welcomes the development of the Barracks site, including provision for some as-yet unquantified future housing need, but does not accept the VWHDC's claim that there are exceptional circumstances to delete land from the Green Belt. The need to delete any land from the Green Belt, let alone on the scale proposed, has not been established.

If the MoD land at Dalton Barracks becomes available for development, the SCNP will support the development of this land to accommodate the identified unmet housing need from Oxford, and the application of 'garden village principles' to that development. Consistent with these principles, the SCNP expects this development to be a discrete and self-contained garden village protective of the rural setting and character of the existing distinct and distinctive settlements of Shippon and Whitecross. Furthermore, the SCNP recognises that the presumption in favour of sustainable development does not mean the presumption that all development is sustainable. It is therefore vital that the necessary infrastructure and facilities (e.g. sewerage, transport systems, health and educational services) are developed in a timely fashion through a meaningful masterplan for the site to ensure that negative impacts on the surrounding area are minimised and that the development is indeed sustainable. We also expect the development to deliver at least some degree of social justice, with social facilities, transport infrastructure and green space provided in a manner enabling existing residents as well as new residents to benefit from the new settlement, instead of existing residents shouldering all the burden and new residents enjoying all the benefits arising from the development of the Barracks site. None of this requires the removal of any land from the Green Belt.

We do not accept the VWHDC's assertion that there are exceptional circumstances for the deletion of land from the Green Belt either at or close to the Barracks site. Deletion of land from the Green Belt

at the Barracks (parcel 1) is not necessary to develop the Barracks site; deletion of land close to the Barracks (parcels 2 and 3, Shippon and Whitecross) is inappropriate in the context of the VWHDC's own adopted policies in Part 1 and its stated intentions with regard to 'garden village principles' at the new development; and deletion of land from the Green Belt is both excessive and unnecessary given the uncertain nature of future housing need, the VWHDC's own concentration of economic growth in the South of the District, and the likely availability of other more appropriate sites outside the Green Belt in the future.

Consequently, we do not accept that there are exceptional circumstances to justify the deletion of any land from the Green Belt at or around the Dalton Barracks site, but we welcome the sensitive and proportionate development of a discrete garden village, which respects and protects the rural setting and character of existing settlements, on the land that is currently owned by the MoD should that land become available for development in the future.

Yours faithfully,

Dr Janet Banfield

MA (Oxon), MSc, M.Res, DPhil, AIEMA, BPSyS, FRGS, FHEA

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

Co-signatories from the Steering Committee:

Carole Page (Chair)

John Ashton

Richard Bahu