

Inspector's Question 66

I would welcome the Council's observations on the representations objecting to the allocation of RAF Halton (165 Sheila Bulpitt, 375 Phil Yerby, 450 Dr Glynn White, 459, 460, Mrs Claire Waters, 1210 Mr A P Smart, 1261 Andy May, 1586 Jane Ellis of Wendover Parish Council, 2423 Jonathan Clover of Wendover Neighbourhood Plan Steering Group, 2032 (Appendices 3 and 7) Jon Gateley of Savills on behalf of Crest Strategic Projects.

Inspector's Question 69

My Q66 sought the Council's views on representations objecting to the allocation D-HAL003 but my list of representations was incomplete. It should include; 461 Mrs Claire Waters, 617, 1869 and 1871 Fiona Lippman on behalf of Halton Parish Council, 300, 303 and 316 John Currell, 739 Andrew Southam of Halton Tennis Centre, 235 Martin Wilkinson of Brocks Moor Projects Ltd, 276 John Mayhead on behalf of the Wendover society, 536, 539 and 540 J Bryson, 652 Derek Larkin, 753 Sue Barber, 808 and 815 Mr and Mrs Keith Ware, 839 Brian Thompson, 914 Jane Hennell on behalf of the Canal & River Trust, 968 Martin Holden, 975 J Mapleston-Stroud, 1140 Mrs J Goward, 1149 T Nichaly, 1151 P Bennewith, 1153 Miriam Hodson, 1154 K Gordon, 1155 Sarah O'Carroll, 1156 Mr & Mrs Richard Burch, 1157 R Hall, 1158, 1159, 1170, 1276, 1278, 1294, (Names censored), 1171 JS Ince, 1172 Michael Hodson, 1173 Mrs k McSweeney, 1174 B Ward, 1175 Mark Cox, 1176 Ivan Welbourne, 1219 Mr and Mrs Bill and Linda Page, 1229 Neil Rowntree on behalf of Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, Paul Beever, 1268 M Bonner, 1269 Deryk Thomas, 1273 Peter Ferrier, 1274 A Grey, 1277 S Concenty, 1325 Mrs B Daniel, 1472 Sport England, 1665 William Spear, 1798 P Chilman, 1929 Cameron Sinclair, 2262 Chris and Shirley Bull, 2270 Tim Byrne of Jones Lang LaSalle on behalf of the DIO, 2405 Jonathan Clover of Wendover Neighbourhood Plan Steering Group, 2482 Damien Campbell, 2509 Peter Bantham, 2542 Mr and Mrs J R and S Taylor, 2657 Joana Berlyn of Sirius Yorkshire on behalf of FCC Environment and 2708 Mrs M Flower.

Main Issues Raised

The main issues raised in representations are as follows

- Site could accommodate more than a 1,000 houses;
- Site is in the green belt and should not be developed;
- The allocated site should be taken out of green belt;
- Entire MoD holding should be included as an allocation in the local plan;
- Impact on AONB;
- Need more detail before becomes policy – too early to establish uses;
- Need to involve local community more;
- Traffic impacts not considered;

- Traffic concerns about rat running through Halton & surrounding settlements;
- Car parking issues in Wendover;
- Site not a sustainable location;
- Loss of open space, community facilities; contrary to government policy (NPPF);
- Halton (Parish) not a strategic settlement;
- Need for improvements to public transport, cycling and walking;
- Blanket housing allocation and detrimental impact on heritage, ecological and leisure activities;
- Lack of consultation on plan/proposed redevelopment;
- Support allocation but no further development beyond plan period;
- Concerns over impacts on existing facilities in Wendover/Halton;
- New tennis centre opportunity;
- Benefits from development need to extend beyond Halton – improvements to Wendover Arm Canal etc.;
- Availability & deliverability of site;
- Air quality/noise pollution concerns.

AVDC Response

It must be acknowledged by everyone that the site of RAF Halton is a long standing (since the First World War) existing operation with a substantial population and significant built up area– involving numerous buildings including existing housing, employment, leisure and an operational airfield. It was and remains a significant generator of traffic in its own right.

The current extent of RAF Halton extends to over 300ha with the largest majority in Halton Parish (part of the grassed airfield and land around the sewage works lies within Aston Clinton Parish adjoining to the north). Concern has been expressed that the entire site should be included to prevent fragmentation of the estate. However the site lies within the Green Belt and only the development of the brownfield parts of the site would accord with paragraph 89 of the NPPF.

Also, the original MoD land holding has already been fragmented. The original military complex included substantial areas in Wendover Parish to the south including a major hospital complex (now redeveloped for housing) and substantial areas of former military housing which connected Wendover to Halton Camp along the B4009. These former sites have been sold off into private ownership. The local plan review will be well underway before the 2022 closure – any appropriate changes/additions to the Halton policy can be included in the new plan.

While the majority of the of the remaining military holdings lie in Halton Parish, there were and are clear linkages with Wendover and it is considered sensible and appropriate to consider the Halton allocation in conjunction with the strategic settlement of Wendover. Wendover is highly constrained by the Green Belt and the

AONB and without the development of RAF Halton this strategic and sustainable location would have no significant housing development. The policy also looks to safeguard the character and appearance of the existing village of Halton which lies outside of the MoD holdings and Halton is clearly classified as a smaller village in the settlement hierarchy (Table 2 Page 38 VALP) where policy D3 will apply.

The policy is for the site to develop 1,000 dwellings during the lifetime of the Vale of Aylesbury Local Plan with an expectation that development will probably continue beyond 2033 provided that the expected early review of the local plan allocates land for development. On a general point this figure reflects the dates put forward for the closure of the camp (airfield element 2020 and the remainder of the holding 2022) and the likelihood of development commencing later on in the plan period up to 2033. Advance planning for the reutilisation of the site can be advanced through the masterplanning and SPD processes so that development can commence immediately after RAF Halton closes.

The Halton Camp allocation covers around 82 hectares. Many representations are concerned that the whole area will be blanketed with housing with the resultant loss of open space, community facilities & heritage assets. The allocated area includes the listed barrack blocks, other heritage assets, many non listed structures, some of which are very large, and an existing road network. Bearing in mind the location & constraints and the context of national planning policy, the local plan proposes to retain the open parts of the site, protect heritage features and maintain sports pitches/facilities for community use.

As an example, while acknowledging different circumstances and location, the Berryfields Major Development area at Aylesbury allocated 85 ha of land to accommodate up to 3,000 dwellings. This is three times the amount of development envisaged for RAF Halton. This helps to illustrate that the RAF Halton allocation of 82 ha will not result in a blanket of housing when considering all planning issues from policy requirements through density, existing curtilages of buildings and settlement character and identity. As with all the allocations in VALP, a generous area is shown to ensure not just housing but all the other necessary components, including 50% green infrastructure (including retaining existing), can be accommodated within the defined area to make a successful scheme.

Notably the whole of the allocation is outside the Chilterns AONB and should development replace existing structures with residential (and or other) uses there should be no significant impact on the AONB. Also, the Chilterns AONB Board has supported the proposal on the basis of the approach set out in VALP.

Importantly the allocated area is all within the Metropolitan Green Belt which restricts development – a point made by a number of representations that the development proposed at RAF Halton is contrary to National Planning Policy. However, under NPPF paragraph 89 “limited infilling or the partial or complete redevelopment of

previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development” is an exception to the prohibition against the construction of new dwellings. Also paragraph 90 of the NPPF states that the “the re-use of buildings provided that the buildings are of permanent and substantial construction” is appropriate development in the Green Belt. The allocation at RAF Halton therefore accords with Government Policy on the Green Belt providing open areas are retained.

Representations have been made that the allocation should be taken out of the green belt to facilitate/maximise development. Removal of land from the green belt requires the demonstration of exceptional circumstances as set out in paragraph 83 of the NPPF. As stated above, the RAF Halton site can be redeveloped within the existing green belt location and the Council is not aware of any exceptional circumstances which would require the site to be removed from the green belt - nor have any such circumstances been raised or identified in representations made on the allocation. An early review of the local plan will be required to take into account new issues such as the changes to the calculation of OAN and the potential implications with major new infrastructure coming forward such as the Oxford to Cambridge Expressway. Any potential changes to green belt boundaries will be considered in the local plan review.

A number of representations have queried the quantum of housing in the allocation – seeking more or less housing on site. On the basis of the considerations above, the Council made an assessment calculation by reviewing the footprint and floorspace of existing buildings suitable for conversion or demolition and replacement with a building of similar dimensions which would not require any amendment to the Green Belt. For example, the now redundant workshops off Chestnut Avenue cover 6 hectares - at a density of 35 houses to the hectare this could deliver 210 houses. Retention and conversion of the 36 existing barrack blocks to around 10 flats per block could deliver 360 dwellings. A range of other buildings such as the Sergeants Mess can be demolished and replaced with housing. This broad initial analysis along with an estimate of deliverability within the time frame of the Plan established a figure of around a 1,000 on this part of the camp and acts as a baseline “do minimum” capacity for the VALP allocation. This baseline figure will be improved upon/finalised through Masterplanning process as part of the work programme on the SPD. Any further additional housing/alternative uses and resultant changes to the green belt will be considered in the local plan review.

A number of representations (including those promoting alternative sites) have questioned the deliverability of 1,000 houses within the Plan period. Agents acting on behalf of DIO have confirmed in their representations that the site will immediately be available on closure and could be developed in its entirety by 2033.

The baseline figure is considered to represent a realistic but broad assessment of what the site will bring forward by 2033 recognising that there may be the opportunity for work to progress on site before the actual closure. The Council continues to work with DIO, BCC and other stakeholders moving the project onwards. Halton Camp represents a significant public land holding and the Council is in on going talks with Homes England to utilise their expertise to ensure the delivery of new homes, where they are most needed and to deliver a sustained improvement in affordability.

Many representations related to traffic concerns particularly regarding congestion in Wendover and potential for rat running through surrounding rural areas/villages. The Camp is already a significant traffic generator impacting on the existing network. Strategic road network impacts modelling the existing traffic generation replaced by a 1,000 dwellings has been assessed by the County Council and the results are evidenced in the Countywide Local Plan Modelling Phase 3 Technical Note. Although of a strategic nature the replacement of the existing camp operations by 1,000 houses (modelled with no additional mitigation) did not raise any significant concerns (Paragraph 5.2.1.6 & Page 53 Wendover RAG rating with comments).

However at the local level the Technical Note and BCC acknowledge the need for local improvement measures and mitigation and these will come forward as part of the detailed design work undertaken to support the preparation of the SPD. Such mitigation will include road, cycling walking and public transport improvements to link into surrounding settlements and transport nodes (for example links to Wendover Station), upgrading the towpath along the Wendover Arm canal, upgrades and improved connectivity via the existing comprehensive footpath network, contributions to improve the existing regular bus service between the Camp – Wendover – Aylesbury, and relevant traffic calming/management measures in surrounding villages/parishes.

Notably cycling and walking links between the camp and Wendover have already been improved along the B4009 following the redevelopment of the former Princess Mary's Hospital. There is also an existing good standard cycle route between Wendover and Aylesbury and a regular bus service already serves the site connecting to Wendover & Aylesbury railway stations where Chiltern Rail run regular rail services to London. The need for extra car parking in Wendover can be addressed through mitigation measures associated with the development should an impact be established.

A number of respondents (including those promoting alternative sites) have sought to question the sustainable location of the site. This is not accepted by the Council for the reasons referenced above. The site is in a sustainable location adjoining a strategic settlement (Wendover) which has a wide range of community facilities, as evidenced in the settlement hierarchy, and the opportunity for further improvements to linkages and facilities in association with the proposed development as set out in

VALP. The local environment will also be protected in accord with national planning policy through the policies set out in VALP. The redevelopment will also make effective use of previously developed land and provide economic and community benefits to replace those lost by the closure of the camp. Specific measures to address concerns like noise and air pollution can be addressed through the SPD and subsequent planning applications in the context of existing impacts. The RAF Halton site adjoining Wendover therefore represents a sustainable development location.

A number of representations (including Halton Parish Council) have expressed concern over the lack of consultation on the Halton Camp proposals and the lack of information (and need for more detail) on the development before any judgements/decisions are made.

Talk of Halton camp closing (common to a lot of MoD bases over the years) has been around for the last 30 or more years. The Deposit Draft VALP (summer 2016) confirmed Wendover as a sustainable location for development albeit constrained by Green Belt. Even though RAF Halton remained as an operational facility at that time, paragraph 3.37 of the Deposit Draft noted in relation to the Green Belt that “The council also proposes to remove part of RAF Halton as it is built up and has an urbanising effect on the Green Belt”. The area to be removed from the Green Belt was set out in map RSA3: Halton Camp. Proposals relating to the site were therefore the subject of consultation in July 2016.

In December 2016 the Government announcement was formally made about the closure of RAF Halton and that it would cease to be part of the MoD estate – a two phased closure 2020 (airfield) & 2022 (remainder of Camp). The Council and DIO were both aware that such an announcement would raise concerns with local residents and have sought to involve all parties as information becomes available and progress is made on future proposals for the Camp. The Submission VALP published in November 2017 is the latest phase of the continuing consultation about the camp and representations are being dealt through an examination in mid 2018.

Discussions on the future of the Camp have also been on going ever since the initial announcement. The possible outcomes of the camp closure were first discussed on 24 March 2017 at an initial Stakeholder (including Parish Councils and other local interests) meeting at Halton – the AVDC presentation highlighted that it was likely to form an allocation in the next stage of Plan as a redevelopment mixed use site in Green Belt and identify suitable levels of development. AVDC and the Parish then met again on 9 May 2017 to discuss camp closure and our need to include it in the next stage of the Plan. After all, a guiding principle in Government planning policy is to encourage the effective use of land by reusing land that has previously been developed. The most recent Stakeholder event was in March 2018.

While the quantum of housing identified in the proposed Submission VALP in November 2017 was new information, discussions about the camp and development

potential had been in the public domain for some time as evidenced above. This approach has been carried forward into the Submission VALP recognising the fact that there has been a formal announcement by Government of the camp's closure.

While there may be some uncertainty over the exact process for closure and all parties still await further detail, we cannot afford to ignore Government announcements and any development potential that results from them. It is after all better to plan positively for change rather than suffering the effects of an ad hoc approach to the probable redevelopment of the camp. Even though it is within the Green Belt this does not in itself preclude appropriate redevelopment of parts of the Camp as evidenced above. The requirement for more detail and information/certainty by the Parish Council, and others, is understood but there needs to be a policy basis established to progress detailed proposals against. The Local Plan is the appropriate vehicle to establish that policy framework.

Further, the supporting text and policy D-HAL003 RAF Halton confirms the requirement for a Masterplan SPD, preservation of heritage assets, taking account of AONB & Green Belt, the need for primary school and new local centre, provision of green infrastructure. Some detailed content is therefore already available. More detail on all these issues will come forward as the work on the masterplan for the site progresses and the SPD will be subject to public consultation which we are required to take account of by regulation. As the site will not close for some time there is sufficient time to provide and discuss the requested detail before any redevelopment commences.

Importantly, no one is being excluded from making an informed response to the proposals for RAF Halton firstly via the Draft Submission Local Plan, through the upcoming examination process and then through consideration of the content of the subsequent SPD. The publication of the VALP Proposed Submission is another stage of the continuing consultation process on RAF Halton which will allow for local concerns to be addressed.

It is understood that the opportunity for a new tennis centre relates to land adjacent to Halton village and therefore lies outside the area allocated for development under policy D-HAL003 RAF Halton. It will therefore be considered under Green Belt policy S4 and other relevant policies should an application come forward. It is not considered that there is sufficient evidence to support the allocation of land in the Green Belt for such a venture in VALP as no exceptional circumstances have been put forward.