

Vale of White Horse Local Plan Part 2 EIP

Matter 5

On behalf of Rosconn Strategic Land

12 June 2018

Introduction

1. McLoughlin Planning is instructed by Rosconn Strategic Land (RSL) to make submissions on the Inspector's List of Matters and Questions for the Vale of White Horse Local Plan Part 2 Examination in respect of Matter 5, Questions 5.1, 5.2, 5.3 and 5.8.
2. RSL's interests relates to its land to the west of the Parish Church of St Peter, Wootton. A site location plan and an illustrative masterplan are appended to this submission.

Question 5.1

3. *'Given the NPPF requirement for exceptional circumstances to be demonstrated for any alteration to the Green Belt, is the proposal to establish an inset to the Green Belt at Dalton Barracks justified by proportionate evidence in principle?'*

Response:

4. RSL consider that the quantum of housing required to be delivered through LPP2, along with the strategy of focusing development in the Abingdon-on-Thames and Oxford Fringe Sub-Area and the large extent of Green Belt within that sub-area, represent the 'exceptional circumstances' needed to justify Green Belt release. The LPP1 Inspector at paragraph 91, page 26 of his report also endorsed this (ALP03). However, whilst RSL supports the release of Green Belt in principle, RSL are not satisfied that the proposal to establish an inset to the Green Belt at Dalton Barracks is justified by proportionate evidence given the concerns set out above in respect of the spatial strategy of the plan and the distribution of housing.
5. In terms of releasing land from the Green Belt, case law in *IM Properties v Lichfield* has already established that there is no test that Green Belt land is to be released as a 'last resort'. Given that the need for Green Belt release is justified, there is need to consider the guidance in the Framework. Paragraph 84 requires the policy maker to consider the '*consequences for sustainable development*'. In this case, the proposed focus of development on a handful of locations outside of the Green Belt and only one large site in the Green Belt fails to consider the impact such a strategy has on sustainable development.

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6. As previously set out, the Council's approach to the delivery of sites of less than 50 dwellings only through Neighbourhood Plans effectively places an embargo on any new residential development at settlements in the Green Belt other than at sites allocated through LLPP1 and LPP2. Again, this will seriously impede the ability of affected settlements to maintain and enhance their vitality and fails to assist in meeting the Key Strand of LPP1.
 7. RSL also point out that the Council previously proposed land at Wootton to be inset from the Green Belt along with a number of other sites through LPP1. The Council argued that *'whilst not currently identified for housing, these parcels could come forward for such use through Neighbourhood Plans or the 'Part 2' plan, to provide for the 1,000 or so of the yet to be allocated Vale's housing needs and/or to meet unmet needs from other districts'* (ALP03 - paragraph 91). The Inspector considered that 'exceptional circumstances' did not exist as he felt that the plan allocated sufficient sites for housing at that time, bearing in mind the late stage that the issue of unmet need arising from other districts was addressed at the examination. However, it is RSL's view that the Inspector's decision not to allocate the sites was the largely the result of the Council's failure to expressly allocate those sites for housing.
 8. Whilst these sites were ultimately retained within the Green Belt, it is important to note that the Inspector stated that *'retaining these parcels of land in the Green Belt now would not prevent their deletion from Green Belt through the 'Part 2' plan or any other local plan or local plan review, if the necessary exceptional circumstances were to be demonstrated'* (ALP03 - paragraph 91). Given that there is a need to release land from the Green Belt for housing, it follows that there is a need and a policy basis for releasing land at Wootton from the Green Belt and allocating it for housing.

Question 5.2

9. *'Is the detailed alignment of the proposed Green Belt inset boundary justified and supported by proportionate evidence?'*

Response:

10. The SA at paragraph 10.10.1 sets out some notable conclusions of the Green Belt Study (2017). One conclusion is that *'the airfield is an open and expansive space*

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with few physical features that could provide a robust Green Belt boundary. Should the site come forward for development, the Green Belt boundary should relate to the extent of settlement proposed within a comprehensive masterplan...”

11. RSL are of the view that without any form of masterplan at this stage, it is simply impossible to determine an appropriate alignment for the Green Belt inset boundary. Whilst the inset boundary following the existing built form to the south east and east of Dalton Barracks appears logical, the inset boundary to the west currently looks to be completely arbitrary. Moreover, without any form of master plan, which at least shows the extent of the build form, it is not entirely clear as to whether the quantum of development envisaged across the entire site can be achieved in an acceptable manner within the inset area.

Question 5.3

12. *'Is the housing allocation at Dalton Barracks appropriate when considered against the reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Have these been adequately assessed? Are the detailed requirements in Core Policy 8b and the site development template requirements – both general and specific – justified and would they provide an appropriate basis for preparation of a Supplementary Planning Document for the site?*

Response:

13. Notwithstanding the Council's assertions that the site will deliver 1,200 dwellings within the plan period (see response to 5.8), there is a serious question mark regarding the adequate assessment of the longer-term plan for the barracks site. It is clear from the plan that the Council views Dalton Barracks as a site, which will deliver around 4,500 in the current and next plan period and that the release of 1,200 is in effect, the first 'phase' of development at the site.
14. A development of such a size will inevitably prejudice the preparation of the next Local Plan review by predetermining decisions about housing delivery. It would be more beneficial to see the Dalton Barracks site come forward as part of a Local Plan Review outside of the LPP2 process, where it can be fully assessed in conjunction with alternative options around the District.

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Question 5.8

15. *'Is it realistic for 1,200 dwellings to be delivered on the site during the plan period? What are the arrangements for the relocation of the existing military personnel on the site and are they realistic? How would the development be phased, and how would this relate to the continuing operation of the barracks?'*

Response:

16. RSL remain unconvinced that 1,200 dwellings can be delivered at Dalton Barracks during the plan period. The Housing Trajectory, which forms part of the evidence base for LPP2 (HOU03), states that Dalton Barracks will deliver 50 dwellings in 2023/24, 100 dwellings in 2024/25, 150 dwellings per year between 2025/26 and 2027/28 and 200 per year between 2028/29 and 2030/31. It is stated that the trajectories are based on discussions with the site promoters and/or developers and the trajectory for Dalton Barracks reflect that set out in the SoCG between the Council and Carter Jonas (on behalf of Dalton Barracks) (SCG17).
17. Other than what is set out in the housing trajectory and SoCG, there is no other evidence to substantiate the anticipated trajectory. RSL also note that the previous trajectory of 200 dwellings being delivered within the next 5 years as set out in the HELLA (HOU202) has already slipped considerably. Moreover, whilst it is noted in the SoCG that dialogue between the DIO and the Council has identified an opportunity for the development of the site to begin in 2024; this is far from being confirmed. If the trajectories for the site slip further, say by 2 years for example, around 450 dwellings would not be provided within the plan period. This represents a considerable chunk of the housing that needs to be allocated in LPP2.
18. In addition to the above RSL are concerned that the trajectory does not take into account the time to prepare and submit an outline planning application, along with the time required to determine the application and any subsequent judicial review period. Furthermore, the time taken to prepare and submit subsequent reserved matters applications will further increase this timescale. Based on industry research, it is understood that a site of this size would not start delivering housing until 4 to 5 years after the point that outline planning permission is granted (Start to Finish – How Quickly do Large-Scale Housing Sites Deliver? – NLP November 2016).

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19. In addition, it is not clear at this stage as to who would deliver the site. The SoCG indicated that there are currently no development partners on board. If an investor consortium acquires the site, what assumptions are made about the timetable for the sale of the site or individual parcels following the grant of planning permission? The delivery of the site also doesn't consider the infrastructure that would be required to be delivered prior to the delivery of any housing on the site. In this context, RSL point out that previous concerns raised by Oxfordshire County Council in respect of the potential for significant transport effects associated with the full capacity of the site do not appear to have been satisfactorily addressed (CSD02.1 - page 285).