
VALE OF WHITE HORSE

LOCAL PLAN PART 2 EXAMINATION

MATTER 5: DALTON BARRACKS

For CEG

(Representor ID: 1096815)

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Matter 5 – Dalton Barracks

- 5.1 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt, is the proposal to establish an inset to the Green Belt at Dalton Barracks justified by proportionate evidence in principle?**
- 5.1.1 We believe there are the exceptional circumstances needed to allow alterations to the Green Belt through Local Plan Part 2, but do not believe these alterations should be constrained solely to amendments to the Green Belt boundary at Dalton Barracks.
- 5.1.2 As a previously developed site, the Council did have the option of retaining Dalton Barracks in the Green Belt, and allowing its redevelopment in due course under paragraph 89 of the NPPF. It is understood that part of the reason for not taking such an approach, is that to facilitate the delivery of housing at Dalton Barracks within the current plan period, it will be necessary to develop on the undeveloped parts of the site, whilst the MoD initially remain in occupation.
- 5.1.3 We note that in the most recent Green Belt work the Council has introduced for the very first time the notion that Abingdon (as well as Oxford) should be defined as historic towns when assessing the contribution land makes to the purposes of the Green Belt. This new approach results in the only difference in ‘scoring’ (in Green Belt terms) between land at Abingdon North (west of Oxford Road) and the undeveloped parts of the Dalton Barracks site proposed for removal from the Green Belt.
- 5.2 Is the detailed alignment of the proposed Green Belt inset boundary justified and supported by proportionate evidence?**
- 5.2.1 The proposed new Green Belt boundary follows an arbitrary line, not in accordance with paragraph 85 of the NPPF, which requires boundaries to be defined using *‘physical features that are readily recognisable and likely to be permanent’*.
- 5.3 Is the housing allocation at Dalton Barracks appropriate when considered against 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 site**

specific – justified and would they provide an appropriate basis for preparation of a Supplementary Planning Document for the site?

- 5.3.1 The SA Report (September 2017) does not include the reasonable alternative of development at Abingdon North, either as a standalone site, or as part of a package of sites in place of Dalton Barracks.
 - 5.3.2 The current evidence base for Local Plan Part 2 does not provide an adequate assessment of ‘reasonable alternatives’.
 - 5.3.3 As above, Abingdon North (west of Oxford Road) received the same ‘scoring’ (in Green Belt terms) as the undeveloped parts of the Dalton Barracks site, other than in relation to the potential impact of development on the setting and special character of Abingdon. Abingdon North is some 2km north of the historic core of Abingdon, with post-war housing estates leading up to Dunmore Road, and then the planned development at North Abingdon (Strategic Site, Local Plan Part 1).
 - 5.3.4 It would be helpful if the Council could suggest locations to stand in the historic core of Abingdon to appreciate the potential risk of an adverse impact from development at Abingdon North on the setting and special character of Abingdon.
 - 5.3.5 Abingdon North is better located than Dalton Barracks to meet the unmet housing needs of Oxford City – a primary purpose of allocating land in Local Plan Part 2.
 - 5.3.6 Abingdon North would be immediately adjacent to the new facilities, services and sports pitches permitted on the North Abingdon Strategic Site, would benefit from the committed investment locally in pedestrian and cyclist routes, would be within reasonable cycling distance of Radley Station, and would also be adjacent to the proposed Lodge Hill Park and Ride.
 - 5.3.7 Fundamentally, development at Abingdon North (west of Oxford Road) would be sustainable by virtue of its location in relation to existing, committed and planned infrastructure. Conversely, significant investment in new infrastructure, facilities and services will be necessary to make any development at Dalton Barracks reasonably sustainable.
- 5.4 How would the proposal for Dalton Barracks relate to the existing community of Shippon? What new services, facilities and infrastructure links would be provided and is this realistic? Is the proposal viable? Would it comprise sustainable development?**

- 5.4.1 The viability, deliverability and sustainability of the Dalton Barracks site are all inextricably linked. As suggested in our Statement for Matter 1 (Duty to Cooperate and Other Legal Requirements) we are not clear what form and scale of development at Dalton Barracks AECOM have assessed in the SA Report (September 2017).
- 5.4.2 Whilst the Local Plan Part 2 proposes delivery of some 1,200 dwellings at Dalton Barracks in the Plan period, there is explicit reference to the potential for in excess of 4,000 dwellings at Dalton Barracks overall.
- 5.4.3 The scale of development at Dalton Barracks will influence the range of new facilities, services and new transport infrastructure that is both required and that can be delivered.
- 5.4.4 There is currently an uncomfortable relationship between the evidence base (for example in relation to highways matters) which only tests the delivery of 1,200 new homes at Dalton Barracks, and the relevant Site Development Template in the Local Plan Part 2, which requires the master planning work to take account of the likely infrastructure needs for a far larger scheme.
- 5.4.5 The optimum master planning solution for Dalton Barracks will look different, if the instruction is to plan for 1,200 units in total, or if the instruction is to plan for 1,200 units initially, but with a further 3,000 or more units to follow.
- 5.4.6 It is not clear to what extent a larger scheme at Dalton Barracks (i.e. a scheme for more than 1,200 units) is a necessity in terms of viability, deliverability or sustainability. If a larger scheme is a necessity for any of these reasons, we believe this larger scheme must be properly tested and justified prior to adoption of the Local Plan Part 2.

5.5 Would the proposal for a Country Park as part of the development adequately mitigate any impact on nearby ecological sites or be otherwise justified and deliverable? How would it be managed and maintained?

- 5.5.1 Dalton Barracks is sensitively located in relation to nearby ecological sites. Further detailed work is required on the issue of adequate mitigation, which may in due course impact on development capacity.

5.6 Are the proposals to safeguard land for bus/cycle links between Dalton Barracks and the Lodge Hill Park and Ride site justified? Would there be any adverse impacts?

5.6.1 The bus and cycle links from Dalton Barracks to the Lodge Hill Park and Ride are proposed to improve the sustainability credentials of the Dalton Barracks site, which lies to the west of the A34, and is currently poorly connected to the planned Lodge Hill Park and Ride.

5.6.2 We note that the County Council, as highways authority, suggest that the safeguarded land for a potential bus/ cycle link between Dalton Barracks and Lodge Hill should be deleted.

5.6.3 There is no robust evidence base to demonstrate the projected demand or viability of constructing the bus/ cycle link, and any future delivery would require the acquisition of extensive stretches of land in third party ownership (adversely impacting on the viability of the scheme in a cost-benefit analysis).

5.6.4 Further, the County Council has confirmed that there is no intention of including the proposal in its Local Transport Plan.

5.7 Is the estimate of site capacity justified in the plan period and in the long term?

5.7.1 We acknowledge that there is capacity for some 1,200 dwellings at Dalton Barracks, but as set out below, believe there a significant risk that this level of development will not be delivered within the Plan period.

5.7.2 Further work is needed to confirm and justify the development capacity of Dalton Barracks in the longer term.

5.8 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?

5.8.1 The delivery of 1,200 dwellings at Dalton Barracks in the plan period is considered at best, ambitious.

5.8.2 Generally, housing trajectories prepared to underpin Local Plans are found to be overly optimistic, with slippage in the planning process and therefore slippage in the timing of delivery.

5.8.3 The housing trajectory for the Vale Local Plan Part 1 is a case in point. Topic Paper 4: Strategic Sites and Policies (November 2014) included at Appendix 3 a Housing Trajectory and Five Housing Land Supply Forecast. This trajectory can

be usefully compared with the very recently published Housing Land Supply Statement for the Vale of White Horse (April 2018) – Appendix C, Housing Trajectory. The general picture is one of slippage.

- 5.8.4 For example, in 2014, the Council anticipated that the Crab Hill site, Wantage, would start delivering housing units in 2015/16, with 600 dwellings delivered by 2018/19. The latest trajectory anticipates delivery commencing this calendar year, with 50 units completed by the end of 2018/19. Similarly, in relation to North West Valley Park, the 2014 trajectory anticipated delivery of 360 units by 2020/21, and the latest trajectory anticipates the delivery of 50 units by 2020/21.
- 5.8.5 The commencement of delivery is projected to slip by two-years on land south of Kennington, and three years on the north west of Radley site.
- 5.8.6 We believe it is reasonable to anticipate, or at the very least, reasonable to acknowledge a clear risk, that the housing trajectory set out for Dalton Barracks in the Statement of Common Ground between the District Council and DIO will prove to be overly ambitious. The risks of slippage are further increased by the challenging infrastructure issues with the Dalton Barracks site, and the possibility that the MoD's programme and priorities will be subject to change.
- 5.8.7 Our Statement on Matter 2 (Unmet Housing Needs from Oxford) provides further comment on the risk of slippage, using MOD Ashchurch as an example.