

**VALE OF WHITE HORSE LOCAL PLAN PART 2
EXAMINATION IN PUBLIC**

**RESPONSE TO MATTER 2 ON BEHALF OF
THE DEFENCE INFRASTRUCTURE ORGANISATION**

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1.0 INTRODUCTION

- 1.1 This statement is submitted by the Defence Infrastructure Organisation (“DIO”) in relation to the Examination in Public of the Vale of White Horse Local Plan Part 2 (“the Plan”). Carter Jonas LLP acts on behalf of the DIO.
- 1.2 Dalton Barracks (the proposed allocation in Core Policy 8b: Dalton Barracks Comprehensive Development Framework) is under the sole control of the Ministry of Defence. The Site is being promoted as a single opportunity with a comprehensive masterplan, supported by a full suite of supporting technical documents.
- 1.3 The Vale of White Horse District Council (“VoWH”) and Oxfordshire County Council (“OCC”) are supportive of the preparation of the Plan and the overall principle direction of key elements of the Plan.
- 1.4 Representations were made detailing the DIO’s views through the informal (Regulation 18) and publication (Regulation 19) consultations for the Local Plan (representor ID 729502).
- 1.5 In this submission, Carter Jonas LLP, on behalf of the DIO, submit responses to:
 - Matter 2 – questions 2.3, 2.4, 2.5, 2.6, 2.7 and 2.8.

2.0 INSPECTOR’S MATTER 2: UNMET HOUSING NEEDS FROM OXFORD

Question 2.3:

Is the spatial strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area the most appropriate when considered against reasonable alternatives and supported by proportionate evidence?

- 2.1 Meeting the unmet housing need of Oxford, as close to the city as is practicable, is a logical and reasonable premise upon which to base a Local Plan strategy. This has led the VoWH to use its adopted spatial strategy to focus meeting these unmet needs in the Abingdon on Thames and Oxford Fringe Sub Area.
- 2.2 Working collectively with the other authorities in Oxfordshire, through the Growth Board, the VoWH has been part of a strategic assessment of alternatives for meeting Oxford’s unmet needs. The Growth Board assessment process considered alternative spatial strategies and sites that helped to identify the apportionment of the unmet need. The Growth Board Green Belt Review and Spatial Options Assessment were used to guide the Local Plan in identifying appropriate locations for allocation.
- 2.3 The VoWH assessed a number of site options for the agreed apportionment figure of 2,200 additional homes. Specific site allocations options were tested through the Housing and Economic Land Availability Assessment (HELAA – reference HOU02) and also strategy and site options through the Sustainability Appraisal (reference CSD09). The DIO suggests that these assessments, coupled with the more detailed site criteria policies and the Infrastructure Delivery Plan (CSD10) provide a proportionate evidence base.

Question 2.4:

Is the stated strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area followed through in the LPP2?

- 2.4 The stated strategy for meeting Oxford’s unmet needs within the Abingdon on Thames and Oxford Fringe Sub Area is met in two ways through LPP2. The first way is to consider the continued commitments and completions in the sub area that have helped to provide a healthy supply of homes. The second way is to make allocations, the most significant of which is at

Dalton Barracks. This approach is reasonable because it reflects the reality that there will always be some level of 'windfall' development that is acceptable in planning terms, and reflects the need to allocate a range of site sizes to maintain the supply and delivery of new homes.

- 2.5 The DIO supports the housing supply detailed in the tables in Core Policy 8a: Additional Site Allocations for Abingdon on Thames and Oxford Fringe Sub Area. As far as Dalton Barracks is concerned, the DIO can confirm that it is deliverable and is able to form a key part of a sustainable strategy to help meet the housing needs of the VoWH and the unmet need of Oxford City. Further detail about the suitability and deliverability of Dalton Barracks is provided in response to 'Matter 5.'

Question 2.5:

Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt and the availability of potential sites, is the balance of the strategy between Green Belt releases (one site – Dalton Barracks) and sites outside the Green Belt the most appropriate?

- 2.6 The release of Green Belt land in the Plan is considered through both LPP1 and LPP2. Studies to support LPP1 considered the performance of the Green Belt and further detailed work submitted with LPP2 has built upon the previous assessments and is presented in the following examination documents:

- Green Belt Review: Exceptional Circumstances Assessment; Dalton Barracks (reference NAT01);
- Green Belt Study – Land Surrounding Dalton Barracks (reference NAT02); and,
- Vale of White Horse District: Green Belt Study of Local Plan Part 2 Sites (reference NAT03).

- 2.7 The DIO supports the VoWH strategy that seeks to deliver development outside of designated areas but also seeks to deliver appropriate sustainable development within the Green Belt. It is considered that this is appropriate and in line with the need to deliver sustainable development, and balance this with the need to protect designated areas as outlined in national policy. There is a reasonable balance struck in both parts of the Plan that of the twenty six strategic allocations only five necessitate a revision of the Green Belt boundaries.

- 2.8 As considered above, the VoWH undertook an iterative assessment and comparison exercise to identify the most appropriate sites to meet the Plan's Vision and Objectives is a reasonable and sustainable way. The particular exceptional circumstances for Dalton Barracks are presented in response to Matter 5 and these, in short, support the findings of the VoWH and it should also be noted that the Barracks provides for significant elements of redevelopment of previously developed land and also the inclusion of new opportunities for public access to the countryside.

Question 2.6:

To what extent is the strategy for meeting these unmet needs deliverable in the necessary timescale?

- 2.9 The delivery of new homes at Dalton Barracks is achievable as set out in the submitted Housing Trajectories (HOU03 / HOU03.1). See the DIO response to Matter 5 for more detail. Other sites within the sub area can also help to contribute to meeting the unmet needs of the City on a range of site types and sizes to provide a healthy supply of new homes across the plan period.

Question 2.7:

To what extent is the strategy for meeting these unmet needs sufficiently flexible if the working assumption figure is revised in future?

- 2.10 There is flexibility in the Plan to manage the delivery of new homes. The DIO supports the flexibility presented particularly, the caveat that the plan target is a minimum and the inclusion of a modest buffer of new homes above the sub area 'target.'
- 2.11 The overall capacity of the site at Dalton Barracks in the region of 4,500 new homes. Whilst the allocation in the plan period is for 1,200 new homes, should it be necessary, there is the option to accelerate the delivery of homes. This would be achieved by the DIO working with partners – particularly the district and county councils – to identify the most appropriate way to manage infrastructure and other obligations alongside the need to deliver new homes.

Question 2.8:

What are the arrangements for securing affordable housing to meet the needs of Oxford within this figure? Would they be effective and deliverable?

- 2.12 The DIO is committed to delivering policy compliant amounts of affordable homes at Dalton Barracks. The DIO support the approach that is suggested through the Plan, that affordable housing across the sub area can meet the unmet need of the districts and there are other ways that could also be explored to enhance the delivery of affordable homes such as rural exception sites.
- 2.13 The viability of development on Dalton Barracks is dependent upon some remediation works above the usually expected build and infrastructure costs, therefore any change to the affordable housing requirements would have to be subject to viability assessment caveats.