

## VoWH Local Plan Part 2 Examination: Matters and Questions

### Dandara Ltd Hearing Statement (Respondent ID: 758199)

#### Introduction

- 1.1 This Hearing Statement has been prepared by Dandara Ltd who are promoting land located to the West of Wantage for residential led, mixed-use development alongside the delivery of the West Wantage Link Road (WWLR), the route of which was safeguarded within the Local Plan Part 1 (LPP1). The site is not proposed for allocation within the Local Plan Part 2 (LPP2).
- 1.2 The Statement concisely addresses the relevant 'List of Matters and Questions' (ID/3) and should be read alongside representations made by Dandara Ltd to the emerging LPP2 dated March 2017 and October 2017. As requested, a separate Hearing Statement has been prepared for each matter and question being addressed.

#### Matter 5 – Dalton Barracks

##### Question 5.1 – Exceptional Circumstances

- 2.1 A detailed consideration of whether the LPP2 satisfies the NPPF para. 83 exceptional circumstances test is considered under our Matter 2, Question 2.5 Hearing Statement.

##### Question 5.3 – Dalton Barracks and Reasonable Alternatives

- 3.1 As set out within our Matter 2, Question 2.5 Hearing Statement, para. 83 of the NPPF does allow for Green Belt boundaries to be altered in exceptional circumstances in association with Plan preparation. However, the LPP2 fails to demonstrate exceptional circumstances for the release of additional Green Belt land associated with the LPP2 at para. 2.75. In particular:
  - As set out in detail within our Matter 2 Hearing Statement, it is accepted by the Council and the Inspector who oversaw the LPP1 examination that there are 4,500 new homes allocated within the LPP1 that spatially support unmet housing need arising from Oxford City whereby "*... it is considered appropriate that the Vale's apportionment of Oxford's unmet need is to be addressed by a combination of the Part 1 strategic site allocations and Part 2 additional allocations*" (Site Selection Topic Paper, para. 4.7, October 2017). Furthermore, para. 2.31 of the LPP2 explicitly recognises that "*... it is also the case that, in reality, any of the homes allocated across the two sub-areas [Abingdon-on-Thames / Oxford Fringe Sub-Area and South East Vale Sub-Area] could contribute towards the [Oxford City's] unmet needs ...*". It is not therefore considered, as asserted within para. 2.75 of the LPP2 that the proximity of the site to Oxford City represents an exceptional circumstance in the context of NPPF para. 83;
  - Whilst Dalton Barracks comprises an element of previously developed land, para. 89 of the NPPF would not consider the partial or complete redevelopment of those existing buildings present on-site for housing as inappropriate subject to not resulting in a greater impact on the openness of the Green Belt and the purpose of including land within it. It is not therefore considered that the previously developed status of part of the Dalton Barracks site represents an exceptional circumstance to justify its removal from the Green Belt;

- One of the principal reasons for the Inspector accepting that exceptional circumstances existed for the release of Green Belt associated with the LPP1 concerned the need to deliver housing within the Abingdon-on-Thames and Oxford Fringe Sub-Area, “... *in particular to meet the future housing needs of people already living in this area*” (Inspector’s Report, para. 86). There is no suggestion within the LPP2 that this exceptional circumstance remains relevant and as per para. 2.31 of the LPP2, any non Green Belt sites within either the Abingdon-on-Thames and Oxford Fringe Sub-Area or South East Vale Sub-Area could assist Oxford City in addressing unmet need;

- Para. 85 of the NPPF is clear that when defining Green Belt boundaries LPAs should, “*not include land which it is unnecessary to keep permanently open*”. When reviewing Green Belt boundaries associated with the LPP1, the Council did not propose the removal of Dalton Barracks. It must therefore follow that it was considered necessary to keep the character of that part of the Green Belt permanently open post adoption of the LPP1 due to it contributing to those purposes set out within NPPF para. 80;

- As set out in more detail within our representations to the publication version VoWH LPP2, land to the West of Wantage represents an unconstrained site which is not located within the Green Belt nor AONB; is located adjacent to Wantage as a sustainable ‘market town’; is able to be Masterplanned to ensure a sensitive landscape led development including in respect of settlement gaps; benefits from significant sustainable transport improvements planned for Wantage within the LPP1 (see Figures 5.6b and 5.6c); and delivers a significant piece of safeguarded LPP1 infrastructure in the WWLR. The lack of suitable, sustainable land outside the Green Belt is not therefore considered to be an exceptional circumstance.

- 3.2 It is therefore considered that the LPP2 cannot be considered sound as ‘inconsistent with national policy’ having failed to satisfy the NPPF para. 83 exceptional circumstances test and ‘unjustified’ with reasonable alternative sustainable sites available outside the Green Belt designation.

#### **Question 5.4 – Relationship to Shippon**

- 4.1 The proposed allocation of Dalton Barracks does not accord with the spatial strategy and settlement hierarchy established within Core Policy 3 of the LPP1, with Shippon classified as a ‘smaller village’. As a result of the LPP2 only proposing to allocate an initial 1,200 homes, there is uncertainty regarding the relationship with the existing village and whether Dalton Barracks would be approached as a new ‘garden community’ or would become a functional extension to Shippon.
- 4.2 In the context of the failure of the LPP2 to satisfy the NPPF para. 83 exceptional circumstance test, uncertainty regarding when the site is available for development and the availability of sustainably located non Green Belt land to address unmet need arising from Oxford City, it is considered that any proposal for the redevelopment of Dalton Barracks should be considered on a holistic basis, for the full 4,000 plus homes, as part of a future review of the Local Plan and is premature in the limited context and scope of the LPP2.

#### **Question 5.8 – Delivery**

- 5.1 The Dalton Barracks site is identified as capable of delivering 1,200 new homes during the Plan period up to 2031, commencing in 2023/24. The potential availability of the site for new housing has arisen following the release of the document ‘*A Better Defence Estate*’ which

was published by the Ministry of Defence in November 2016. Pg. 24 of the document identifies that Dalton Barracks including Abingdon Airfield is earmarked for disposal estimated to be 2029. However, the LPP2 allocates 1,200 dwellings for delivery by 2031 on the basis that *“dialogue between the Defence Infrastructure Organisation (DIO) and the District Council has identified an opportunity to release the site sooner than 2029 and the Council is satisfied that 1,200 homes can be delivered on the site within the Plan period up to 2031”* (para. 2.53).

- 5.2 Para. 2.54 then goes on to suggest that *“around half the growth envisaged within the Plan period can be delivered on-site even before the military units are relocated. However it is anticipated that the military units will be relocated no later than 2026”*. The ‘A Better Defence Estate’ document was only published in November 2016 with an estimated disposal date of 2029 and it is unclear why the document, which comprises a holistic consideration of the DIO estate, has undergone a fundamental strategic and operational change in respect of Dalton Barracks.
- 5.3 The Inspector will be aware of the inherent complexities associated with the disposal of public sector land in military use surrounding reprovision of the services, security, deregulation, disposal and remediation which render its deliverability inherently uncertain. The LPP2 has provided no substantive evidence to justify an earlier disposal date than 2029 which, to deliver 1,200 new homes by 2031, would need to be significantly earlier to allow for disposal, remediation, grant of planning permission, approval of reserved matters / conditions and dwelling construction. Even if some housing can be delivered concurrently with military units remaining on the site, the LPP2 has not taken into account issues surrounding site-wide remediation, security issues and, perhaps most importantly, the appetite of developers and the market to provide and sell new housing located ‘cheek by jowl’ with an active military site.
- 5.4 We are concerned that the ‘A Better Defence Estate’ document set out a comprehensive strategy for the entirety of the MoD estate across all parts of the service. As a minimum, we would ask for evidence that the discussions held between the VoWH and the DOI are representative of the MoD service as a whole and particularly the operational / military parts of the group. It would then be necessary for comfort to be provided that the initial assumptions that fed into the original disposal date of 2029 have been revised and that these have sign-off at the highest level of the MoD.
- 5.5 If the Inspector is satisfied that the MoD as a whole has prioritised Dalton Barracks for disposal, and that this represents a joined-up strategy from all aspects of the service, it is recommended that an additional non-delivery percentage is applied to the housing trajectory contained within the LPP2 to recognise the inherent complexities and uncertainties associated with the disposal and redevelopment of former military sites. This is particularly important to the deliverability of the Plan given similar delivery timing concerns associated with North West Grove considered under Matter 6.