Vale of White Horse Local Plan 2031 Part 2

**Examination Hearings** 

Written Statement by Vale of White Horse District Council in relation to

Matter 5: Dalton Barracks

June 2018

(Note: Discussion should cover the long term proposal for 4,000+ dwellings as well as the proposal for 1,200 dwellings during the plan period. This matter includes site specific issues)

# 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 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt, the proposal to establish an inset to the Green Belt at Dalton Barracks is justified by proportionate evidence.
- 5.1.2 The evidence which has informed the justification for the proposal includes a comprehensive local Green Belt Review<sup>1</sup> undertaken to inform the site selection process for the Part 1 plan and a Strategic Oxford Green Belt Assessment<sup>2</sup> commissioned by the Oxfordshire Growth Board (as part of its work to consider unmet housing need for Oxford).
- 5.1.3 The decision to release Ministry of Defence land at Dalton Barracks came in the 'A Better Defence Estate' (OCD01)<sup>3</sup> announcement by the Secretary of State for Defence in November 2016. The Dalton Barracks site had not been assessed prior to this, either during the development of the Part 1 plan nor by the Oxfordshire Growth Board process to identify potential sites to accommodate unmet housing need for Oxford (it was not known that the Defence Infrastructure Organisation (DIO) would be seeking to release the site from their estate and thus make it available for redevelopment). The Council consider the release of the Dalton Barracks site by the DIO to constitute a 'major change in circumstances'<sup>4</sup>.
- 5.1.4 In addition to the significant evidence base which informed the Part 1 plan, a Green Belt Assessment (NAT03)<sup>5</sup> was undertaken for the Part 2 plan which informed the site selection process and considered the extent to which potential development sites within the Green Belt, including the Dalton Barracks site, contributed to the purposes of the Green Belt. This formed part of a comprehensive and iterative approach to site selection which is set out in Topic Paper 2: Site Selection (TOP02.1)<sup>6</sup>. The approach is consistent with the approach to identify the strategic site allocations in the Part 1 plan. The Inspector concluded in his Report (ALP03)<sup>7</sup> at paragraph 75 that "the

<sup>5</sup> NAT03 Green Belt Study of Local Plan Part 2 Sites and associated appendices

<sup>&</sup>lt;sup>1</sup> **NAT02** Green Belt Review Phase 1 and 2 and **NAT03** Green Belt Review Phase 3 of Local Plan 2031 Part 1: Strategic Sites and Policies

 <sup>&</sup>lt;sup>2</sup> NAT09 Oxfordshire Green Belt Study of Local Plan 2031 Part 1: Strategic Sites and Policies
<sup>3</sup> OCD01 A Better Defence Estate

<sup>&</sup>lt;sup>4</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 82), available at: <u>https://www.gov.uk/government/publications/national-planning-policy-framework--2</u>

<sup>&</sup>lt;sup>6</sup> TOP02.1 Topic Paper 2: Site Selection (Publication Version)

<sup>&</sup>lt;sup>7</sup> **ALP03** Inspector's Report on the examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraph 75)

strategic sites were identified through a robust, five stage selection process, which will contribute towards delivering this provision". More detail on this process has been included in response to question 5.3.

- 5.1.5 Further to this, a specific Green Belt Study of Dalton Barracks and its surroundings (NAT02)<sup>8</sup> also forms part of the evidence base for the Part 2 plan and supports the proposal to establish an inset to the Green Belt at Dalton Barracks. An Exceptional Circumstances Assessment (NAT01 NAT01.2)<sup>9</sup> was also undertaken specifically for Dalton Barracks, the outcome of which is discussed in more detail below.
- 5.1.6 The assessment of the site's impact on the purposes of the Green Belt concluded that the existing developed area of the barracks already has an impact on the openness of the Green Belt and could be redeveloped without unacceptable harm to the Green Belt. The remaining area, the land in the north-east of the site and north-west of the site, contribute to purpose 3 as set out in paragraph 80 of the NPPF (to assist in safeguarding the countryside from encroachment) with land in the north-east also contributing to purpose 2 (to prevent neighbouring towns merging into one another)<sup>10</sup>. although the Study concluded there is the potential for development within the site without significant harm to the wider Green Belt designation.
- 5.1.7 The Exceptional Circumstances Assessment for Dalton Barracks outlines the following exceptional circumstances that exist to justify the amendment to the Green Belt boundary at Dalton Barracks:
  - the availability of a sustainable and significant site for development, not previously available. This change is considered to be a 'major change in circumstances'.
  - assessment work, including a Green Belt Study of the potential development sites considered in preparation of the Part 2 plan which demonstrates that removal of the Dalton Barracks site from the Green Belt for development would have limited impact on the function of the Green Belt.
  - the site is close to Oxford and has the potential to be developed as a highly sustainable new community with excellent public transport, walking and cycling connectivity to Oxford and Abingdon-on-Thames and is considered to be compatible with the Spatial Strategy set out in the Part 1 plan.
  - the site presents an opportunity to develop a large area of brownfield (previously developed land) in close proximity to Oxford and Abingdonon-Thames. This is in accordance with paragraph 17 of the NPPF which outlines a set of core land-use planning principles which should underpin both plan-making and decision-taking.

<sup>&</sup>lt;sup>8</sup> NAT02 Green Belt Study; Land Surrounding Dalton Barracks

 <sup>&</sup>lt;sup>9</sup> NAT01 – NAT01.2 Green Belt Review: Exceptional Circumstances Assessment; Dalton Barracks
<sup>10</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 80), available at: <a href="https://www.gov.uk/government/publications/national-planning-policy-framework-2">https://www.gov.uk/government/publications/national-planning-policy-framework-2</a>

- 5.1.8 The proposal to establish an inset to the Green Belt at Dalton Barracks is consistent with Core Policy 13 of the Part 1 plan, which sets out the Council's approach to development within the Oxford Green Belt. It is also consistent with the approach taken in the Part 1 plan to release land for housing allocations at Abingdon, Kennington and Radley, which are also located close to Oxford and would contribute to the Vale's proportion of Oxford's unmet housing need.
- 5.1.9 In his report on the Part 1 plan (ALP03) the Inspector concluded that Green Belt boundaries could be amended again through another Local Plan or a Local Plan review if the necessary exceptional circumstances were demonstrated<sup>11</sup>.
- 5.1.10 The Council is seeking to ensure consistency with national policy in its proposal to establish an inset to the Green Belt at Dalton Barracks, including paragraph 83 of the NPPF which states that when proposing alterations to Green Belt boundaries, "*authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*".
- 5.1.11 The Council also notes the emerging NPPF<sup>12</sup> indicates at paragraph 136 that *"before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development".* The Council considers that all other reasonable options have been examined and this is discussed further in response to question 5.3 below.
- 5.1.12 The Council considers that the proposed removal of the site from the Green Belt will cause minimal harm to the Green Belt purposes, support maximum use of brownfield sites and provide long-term flexibility thus minimising the likelihood of further Green Belt amendments being required in the future. The Council considers that 'exceptional circumstances' have been demonstrated to justify an inset to the Green Belt at Dalton Barracks and this is supported by proportionate evidence.

<sup>&</sup>lt;sup>11</sup> **ALP03** Inspector's Report on the Examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraphs 91, 93 and 94)

<sup>&</sup>lt;sup>12</sup> MHCLG (2018) National Planning Policy Framework, Draft text for consultation (in particular paragraph 136), available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/68 5289/Draft\_revised\_National\_Planning\_Policy\_Framework.pdf

### 5.2 Is the detailed alignment of the proposed Green Belt inset boundary justified and supported by proportionate evidence?

- 5.2.1 The detailed alignment of the proposed Green Belt inset boundary as set out in the Part 2 plan is justified and supported by proportionate evidence.
- 5.2.2 The proposed change to the Green Belt boundary at Dalton Barracks has been informed by a number of evidence base documents, including a detailed Green Belt Study (NAT02)<sup>13</sup> of the site and its surroundings, a Landscape Capacity Study (NAT07 NAT07.2)<sup>14</sup> and a Landscape Character Assessment (NAT08 NAT08.5)<sup>15</sup>. As is stated in the response to question 5.1, the area proposed to be removed from the Green Belt is not considered to contribute strongly to the purposes of the Green Belt, particularly as much of the site is previously developed land, and so its removal will have limited impact on the function of the Green Belt.
- 5.2.3 The proposed Green Belt boundary is outlined in the Part 2 plan at figure 2.3 (**CSD01**)<sup>16</sup>. The openness between Abingdon-on-Thames and Shippon, Shippon and Wootton, much of the existing airfield area, and between the proposed new development and Whitecross, are all substantially maintained. Shippon is inset to the Green Belt as it will form an integrated and continuous settlement with Dalton Barracks.
- 5.2.4 There are few, if any, existing features available to provide the basis for a robust Green Belt boundary on the western edge of the site. The proposed settlement, being masterplan led, will have a settlement edge defined by the constraints and opportunities of the site. The new settlement edge would form the new boundary to the Green Belt, and once the development is complete, should form a robust and easily recognisable boundary that would continue beyond the plan period.
- 5.2.5 The boundary to the south, north and east is more clearly defined, using the existing built up area as the basis of the boundary.
- 5.2.6 An amendment was made to the area proposed to be inset from the Green Belt following Regulation 18 consultation on the Part 2 plan. The amendment moved the eastern edge of the proposed Green Belt inset to allow a gap between the developable area at Dalton Barracks and the existing settlement of Whitecross. Shippon currently adjoins the built form of the proposed allocation at Dalton Barracks and would form a coherent settlement with the proposed development. It is proposed to be inset from the Green Belt. The relationship with and connections to the village of Shippon will be explored through the development of a comprehensive development framework for the site.

- <sup>14</sup> NAT07 NAT07.2 Vale of White Horse District Local Plan Part 2: Landscape Capacity Study
- <sup>15</sup> NAT08 NAT08.5 Vale of White Horse Landscape Character Assessment
- <sup>16</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version), Figure 2.3

<sup>&</sup>lt;sup>13</sup> NAT02 Green Belt Study; Land Surrounding Dalton Barracks

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

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?

- 5.3.1 The housing allocation at Dalton Barracks is appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts which have been adequately assessed.
- 5.3.2 The Council's strategy and selection of sites, including Dalton Barracks, fully accords with the National Planning Policy Framework and will enable the delivery of sustainable development.
- 5.3.3 The Council has followed a comprehensive and iterative approach to site selection informed by proportionate technical evidence, informal consultation with key stakeholders, including statutory bodies and infrastructure providers and subject to Sustainability Appraisal (SA). The Council's approach to site selection is set out in the Site Selection Topic Paper (**TOP02.1**)<sup>17</sup>. This is consistent with the approach to identify the strategic site allocations in the Part 1 plan. The Inspector concluded in his Report at paragraph 75<sup>18</sup> that "the strategic sites were identified through a robust, five stage selection process, which will contribute towards delivering this provision".
- 5.3.4 Following initial stages of the site selection process (Stages 1 to 3 of the Site Selection Topic Paper; **TOP02.1**), Dalton Barracks was one of the larger site options taken forward for detailed evidence testing, informal consultation and was subject to SA. The Council has worked with external consultants, AECOM, throughout the site selection process to ensure reasonable alternatives (both for sites and strategies) were tested.
- 5.3.5 This was informed by a number of technical evidence base studies that assessed impact or capacity to accommodate development, including factors such as landscape, transport, viability, flood risk and drainage and Green Belt.

<sup>&</sup>lt;sup>17</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version)

<sup>&</sup>lt;sup>18</sup> **ALP03** Inspector's Report on the examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraph 75)

- 5.3.6 The SA Report (CSD09)<sup>19</sup> established reasonable alternatives for large site options. These are set out in Table A of Appendix III and Table A of Appendix IV of the SA Report to support the Submission Version of the Part 2 plan. A full summary of the appraisal findings is contained within Table B of Appendix IV of the SA Report.
- 5.3.7 Dalton Barracks is a relatively unconstrained site which, although requiring an inset to the Green Belt, can be redeveloped with minimal adverse effect to the Green Belt. The site is close to both Oxford and Abingdon-on-Thames, has the potential to be developed as a highly sustainable community and would enable the delivery of infrastructure to support sustainable modes of travel. Biodiversity is a key environmental consideration, given nearby Cothill Fen SAC and other designated sites, however redevelopment would involve making use of brownfield land, with a Country Park provided of at least 80 hectares located on the predominately existing greenfield part of the site and that is in closest proximity to the SAC, which will provide an appropriate buffer
- 5.3.8 The Council considers the allocation of the Dalton Barracks site to be appropriate having undertaken a comprehensive assessment of a range of alternatives in a proportionate and robust manner.
- 5.3.9 In conclusion, the Council considers there to be no other reasonable alternatives which would provide an opportunity to maximise use of brownfield land, minimise Green Belt impact, deliver a comprehensive package of infrastructure including new schools, connect new housing well to its surroundings via sustainable modes and facilitate such a comprehensive approach to planning for the long term.

#### 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?

- 5.3.10 The detailed requirements in Core Policy 8b and the requirements set out in the site development template (Appendix A of the Part 2 plan; CSD01.1)<sup>20</sup> are justified. The Council also considers that they provide an appropriate basis for the preparation of a Supplementary Planning Document for the site.
- 5.3.11 The detailed requirements in Core Policy 8b and the site development template serve to guide and ensure sustainable development is delivered on the site by establishing the requirements, including necessary infrastructure requirements, to ensure a sustainable development is delivered in accordance with the National Planning Policy Framework.

<sup>&</sup>lt;sup>19</sup> **CSD09** Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 2 (Publication Version)

<sup>&</sup>lt;sup>20</sup> **CSD01.1** Local Plan 2031 Part 2: Detailed Policies and Additional Sites Appendices (Publication Version)

- 5.3.12 The site development template identifies key objectives for the site and also requirements in relation to matters such as infrastructure provision, community facilities and biodiversity.
- 5.3.13 The development of the site development template for Dalton Barracks has followed a comprehensive process which included formal and informal engagement with key stakeholders and infrastructure providers, including Oxfordshire County Council, Thames Water, Highways England and the Oxfordshire Clinical Commissioning Group (CCG). The feedback received from the key stages of informal consultation assisted in refining the site-specific requirements for each site allocation. Furthermore, specific points raised through public consultation, including from statutory bodies and infrastructure providers, were addressed through updates to the Site Development Templates. This is documented in Section 5 of the Council's Regulation 22 Statement (CSD02)<sup>21</sup>.
- 5.3.14 The approach taken to produce the General Requirements as set out in the Site Development Templates (CSD01.1)<sup>22</sup> is consistent with the approach that informed the adopted Part 1 plan. The Inspector presiding over the Examination of the Part 1 plan concluded that the site development templates were based on evidence from relevant providers and considered it unnecessary for additional infrastructure/services to be referenced in the Plan<sup>23</sup>.
- 5.3.15 The Council considers the approach that it has taken demonstrates its commitment to the site and its support for the relevant infrastructure necessary to for delivery of the site.
- 5.3.16 The Council highlight support from statutory and prescribed bodies, and infrastructure providers for the Site Development Templates, including from Oxfordshire County Council (relating to matters including highways, education and health), the Oxfordshire CCG/ NHS England, Historic England, Natural England, Thames Water and Environment Agency. This support is documented within their respective Statements of Common Ground with the Council to support the Submission Version of the Part 2 plan<sup>24</sup>.
- 5.3.17 Core Policy 8b outlines that additional guidance will be provided by a comprehensive development framework that will be published as a Supplementary Planning Document (SPD). The SPD for the site, , will build on the site development template, adding detail to the requirements of the site, ensuring that proposals are considered in the context of a

<sup>&</sup>lt;sup>21</sup> **CSD02** Regulation 22 Consultation Statement (in particular Section 5)

<sup>&</sup>lt;sup>22</sup> **CSD01.1** Local Plan 2031 Part 2 Detailed Policies and Additional Sites Appendices (Publication Version)

<sup>&</sup>lt;sup>23</sup> **ALP03** Inspector's Report on the examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraph 149)

<sup>&</sup>lt;sup>24</sup> **SCG02** Statement of Common Ground with Highways England, **SCG10** Statement of Common Ground with Thames Water, **SCG14** Statement of Common Ground with Natural England, **SCG15** Statement of Common Ground with Environment Agency and **SCG20.2** Statement of Common Ground with Oxfordshire County Council, 3: Local Plan Sites

comprehensive approach to the whole site, that housing will be provided to an exemplar standard and Garden Village principles are followed.

- 5.3.18 The Statement of Common Ground with the Defence Infrastructure Organisation (DIO) outlines agreement to the approach set out in Core Policy 8b (SCG17)<sup>25</sup>.
- 5.3.19 At the Regulation 19 stage of plan development it was requested that Core Policy 8b be amended to make it clear that all phases of development should provide proportionate infrastructure. The District Council agrees with the principle of the suggested amendment and is proposing a modification (AM5) to the supporting text of the Part 2 plan to make it clear that all phases of development will be required to contribute towards infrastructure<sup>26</sup>.

<sup>&</sup>lt;sup>25</sup> **SCG17** Statement of Common Ground with Carter Jonas on Dalton Barracks

<sup>&</sup>lt;sup>26</sup> CSD03 Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version), Schedule of Proposed Additional Modifications, AM5

- 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 site will deliver a comprehensive range of new services, facilities and infrastructure links, in line with Garden Village principles, which would support the long-term sustainability of a coherent and integrated site.
- 5.4.2 Initially the services, facilities and infrastructure will be on a scale proportionate to the level of development allocated within the Part 2 plan (1,200 dwellings), with additional or enhanced services, facilities and infrastructure provided as the site is developed out to its longer-term potential (in excess of 4,000 dwellings).
- 5.4.3 The site development template (Appendix A of the Part 2 plan; **CSD01.1**)<sup>27</sup> sets out the key requirements for the development and how the provision of certain infrastructure and services relate to the phasing of development of the site. For example, the site is expected to deliver a new primary school as part of development that is allocated during the plan period, with a secondary school and two further primary schools forming part of future phases of development. The SPD (as referenced in question 5.3) will be informed by the site development template and will build upon the site development template in terms of provision of new services, facilities and infrastructure links for the development.
- 5.4.4 The services, facilities and infrastructure outlined in the site development template are realistic for the 1,200 dwellings to be delivered during the plan period.
- 5.4.5 Services, facilities and infrastructure provided as part of phase one of the development (i.e. development during the plan period) are likely to include the first phase of a substantial Country Park, a community centre and primary school. In addition, provision to enhance sustainable travel options to Oxford and Abingdon-on-Thames will be provided as part of phase one of the development, ensuring connectivity to the wider area.
- 5.4.6 A network of safe and attractive walking and cycling routes connecting the site with the surrounding area will form an integral part of the requirements of the site. This is in accordance with NPPF paragraph 17 which lists one of the core planning principles as "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"<sup>28</sup>.

<sup>&</sup>lt;sup>27</sup> **CSD01.1** Local Plan 2031 Part 2 Detailed Policies and Additional Sites Appendices (Publication Version)

<sup>&</sup>lt;sup>28</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 17), available at: <u>https://www.gov.uk/government/publications/national-planning-policy-framework--2</u>

- 5.4.7 The site will comprise sustainable development in accordance with paragraph 7 of the National Planning Policy Framework. The site would comprise sustainable development by providing housing in a location that would allow for convenient and sustainable access to employment opportunities at Oxford (economic), by creating a high quality built environment with accessible services that reflect the community's needs (social) and through the provision of a Country Park which will serve as a buffer to protect the sensitive ecological sites in the area (environmental).
- 5.4.8 The Council consider the site is viable as demonstrated through the Local Plan Viability Update (**INF02**)<sup>29</sup>. The Viability Update was prepared by independent consultants HDH Planning & Development Ltd which concluded that the site is deliverable and viable having considered policy requirements and developer contributions.
- 5.4.9 The village of Shippon is located adjacent to the Dalton Barracks site. The village has a historic centre and a rural setting which will be respected by the new development at Dalton Barracks and Abingdon Airfield. The proposed phasing of the site supports the provision of new facilities in proximity to Shippon, with development starting in the southern section of the site.
- 5.4.10 To provide clarity on the approach to protecting the historic environment of Shippon, a proposed modification to the supporting text of the Part 2 plan (AM4) has been included in the Schedule of Proposed Additional Modifications (CSD03)<sup>30</sup> as follows: "The historic centre of Shippon lies to the South of Dalton Barracks. It remains relatively intact and still survives as a historic village with a rural approach from the west along Barrow Road. Development on the southern part of the site should respect the historic character of Shippon and its rural approach."
- 5.4.11 The development of Dalton Barracks will respect the character of the historic village of Shippon, while also providing additional facilities and infrastructure for the community.
- 5.4.12 It is also of note that the development of the site is in line with the "A Better Defence Estate" (OCD01)<sup>31</sup> announcement made by the Secretary of State for Defence in November 2016, which cited Dalton Barracks and Abingdon Airfield as being surplus to Defence requirements and able to be developed, thereby reducing the ongoing cost of the site to the military. This proposal from the Ministry of Defence forms part of UK Government policy to build 55,000 homes on former MoD land. Dalton Barracks is one of the sites being prioritised through that process.

<sup>&</sup>lt;sup>29</sup> INF02 Viability Update

<sup>&</sup>lt;sup>30</sup> CSD03 Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version),

Schedule of Proposed Additional Modifications, AM4

<sup>&</sup>lt;sup>31</sup> **OCD01** A Better Defence Estate

- 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 lies to the east of a number of sites of ecological importance, including Cothill Fen Special Area of Conservation (SAC) and Dry Sandford Pit Site of Special Scientific Interest (SSSI). The site development template (Appendix A of the Part 2 plan; (CSD01.1)<sup>32</sup> requires that there are no adverse impacts on the nearby ecological sites as a result of the development of Dalton Barracks.
- 5.5.2 As is detailed in the Council's matter 1 statement, in response to question 1.9, the Council has recently worked with its consultants, AECOM, to prepare an Habitats Regulations Assessment (HRA; incorporating Appropriate Assessment; CSD08.2)<sup>33</sup> for the Part 2 plan in order that the approach accords with a recent judgement of the Court of Justice of the European Union in People over Wind, Peter Sweetman v Coillte Teoranta (Case C-323/17) and subsequent Planning Inspectorate Guidance (PINS Note 05/2018).
- 5.5.3 The HRA concludes that it is possible that additional housing in proximity to Cothill Fen SAC could, without mitigation, lead to adverse effects on the integrity of that SAC through recreational pressure as a result of the delivery of the Dalton Barracks development. It goes on to state that, coupled with effective site management, the provision of a Country Park of at least 80 hectares will be able to incorporate sufficient areas of Suitable Alternative Natural Greenspace (SANG) to deter users of Dalton Barracks from using Cothill Fen SAC for recreational purposes. It concludes that the development set out in the plan will not result in adverse effects on the integrity of the Cothill Fen SAC.
- 5.5.4 Core Policy 8b of the Part 2 plan sets out the requirement for the provision for a Country Park of at least 80 hectares, which would be located on the western side of the site within an area that would remain within the Green Belt. This would provide a buffer between the proposed development and the designated sites and would also takes account of the requirements of the site regarding open space for the full build out of the site.
- 5.5.5 Delivery of the Country Park will commence as part of phase one of development, during the plan period. The HRA (**CSD08.2**; paragraph 7.5.23)<sup>34</sup> references the most stringent standards applied by Natural England to the provision of SANG and states that 1,200 dwellings during the plan

<sup>&</sup>lt;sup>32</sup> **CSD01.1** Local Plan 2031 Part 2: Detailed Policies and Additional Sites Appendices (Publication Version)

<sup>&</sup>lt;sup>33</sup> **CSD08.2** Habitats Regulations Assessment (HRA) of the Vale of White Horse District Local Plan 2031 Part 2, June 2018

<sup>&</sup>lt;sup>34</sup> **CSD08.2** Habitats Regulations Assessment (HRA) of the Vale of White Horse District Local Plan 2031 Part 2, June 2018 (in particular paragraph 7.5.23)

period would be expected to generate a need for SANG of at least 22 hectares. The HRA goes on to state that the SANG must be of a nature that is likely to attract visitors to utilise it rather than the nearby SAC.

- 5.5.6 As is set out in the Statement of Common Ground with the DIO (**SCG17**)<sup>35</sup> and the site development team's Delivery Document, the DIO fully support the principle of a Country Park and consider its delivery to be realistic and viable.
- 5.5.7 As is noted in the Statement of Common Ground between the Council and Natural England (SCG14)<sup>36</sup>, and the site development template for Dalton Barracks (CSD01.1)<sup>37</sup>, the HRA of the Part 2 plan (CSD08.2)<sup>38</sup> includes a recommendation that the development should be subject to project-level HRA, as the development proposals will contain a greater level of detail that should be assessed most appropriately at that point.
- 5.5.8 An appropriate approach will be followed in order to ensure a model for management and maintenance which supports the long-term sustainability of the Country Park. This may involve a commercial provider or an appropriate body, such as a charitable organisation that has experience in managing and maintaining public open spaces of this type, could be identified and may provide a more cost-effective option, as has recently been the case on another development site in the district. This will be subject to normal negotiation at planning application stage.

<sup>&</sup>lt;sup>35</sup> **SCG17** Statement of Common Ground with Carter Jonas on Dalton Barracks

<sup>&</sup>lt;sup>36</sup> **SCG14** Statement of Common Ground with Natural England

<sup>&</sup>lt;sup>37</sup> **CSD01.1** Local Plan 2031 Part 2: Detailed Policies and Additional Sites Appendices (Publication Version) (in particular pages 13 – 16)

<sup>&</sup>lt;sup>38</sup> **CSD08.2** Habitats Regulations Assessment (HRA) of the Vale of White Horse District Local Plan 2031 Part 2, June 2018

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

- 5.6.1 The Council considers the proposal to safeguard land for a bus/ cycle link between Dalton Barracks and the Lodge Hill Park and Ride site to be justified.
- 5.6.2 The Council has included the proposal to safeguard land for a bus/ cycle link between Dalton Barracks and the site of the proposed Lodge Hill Park and Ride in support of the provision of sustainable modes of travel in the area, including to Oxford City. The safeguarding demonstrates the intent of the Council to support Oxfordshire County Council with the ambition it sets out in Connecting Oxfordshire: Local Transport Plan: 2015-2031 (TRA01)<sup>39</sup> and its suite of supporting documents including the Oxford Transport Strategy<sup>40</sup>, the Bus and Rapid Transit Strategy<sup>41</sup> and the Science Transit Strategy<sup>42</sup>.
- 5.6.3 The Council notes that the countywide infrastructure priorities set out in the Oxfordshire Infrastructure Strategy (OXIS)<sup>43</sup> include ten items relating to the delivery of 'Rapid Transit Lines' around the city of Oxford, including Rapid Transit 3 Hollow Way to Lodge Hill and Sandford-on-Thames, along with the proposed Park and Ride at A34 South (Lodge Hill) and within the 'Knowledge Spine South' Corridor proposals for the A34 bus lane between Lodge Hill and Hinksey Junctions'. Dalton Barracks lies approximately one mile from the proposed Lodge Hill Public Transport Interchange and there is potential for sustainable connections to the network to be maximised in the longer term.
- 5.6.4 The Sustainable Transport Study for the Abingdon to Oxford Corridor (October 2017; **TRA05**)<sup>44</sup> states that *"The Dalton Barracks to Lodge Hill busway (B2) could offer significant potential, particularly when considered alongside the wider delivery of BRT routes across Oxford. Whilst there could be challenges in terms of deliverability, this would clearly provide a direct and efficient route to a public transport interchange at Lodge Hill, into Oxford itself and employment sites to the east of Oxford, as well as on to other connective services".*
- 5.6.5 The link is not expected to be provided within the plan period or be required to support the development of the first phase of houses. The use of the link could evolve over time, taking the form of a cycle link initially and evolving in

<sup>&</sup>lt;sup>39</sup> **TRA01** Connecting Oxfordshire: Local Transport Plan 2015 – 2031

<sup>&</sup>lt;sup>40</sup> **TRA01.8.1** Connecting Oxfordshire: Local Transport Plan 2015 – 2031, Volume 8 Part i: Oxford Transport Strategy

<sup>&</sup>lt;sup>41</sup> **TRA01.2** Connecting Oxfordshire: Local Transport Plan 2015 – 2031, Volume 2: Bus & Rapid Transit Strategy

<sup>&</sup>lt;sup>42</sup> **TRA01.6** Connecting Oxfordshire: Local Transport Plan 2015 – 2031, Volume 6 Innovation in Oxfordshire – Science Transit Strategy

<sup>&</sup>lt;sup>43</sup> **INF01** Oxfordshire Infrastructure Strategy Stage 1 Report

<sup>&</sup>lt;sup>44</sup> **TRA05** Sustainable Transport Study for the Abingdon to Oxford Corridor

the future to be used by other modes of sustainable transport, such as buses or autonomous vehicles.

- 5.6.6 The Council considers the safeguarding of the link to be in line with paragraph 35 of the NPPF<sup>45</sup> which states that *"Local plans should protect and exploit opportunities for the use of sustainable modes for the movement of goods or people".*
- 5.6.7 Any future proposal will need to comply with the policies of the Local Plan 2031 as a whole, including the requirements set out in Core Policy 12 of the Part 1 plan (ALP02)<sup>46</sup>. This policy ensures that schemes are subject to a thorough assessment of their potential adverse impacts, including full environmental and archaeological assessments working in association with the relevant statutory bodies.

<sup>45</sup> CLG (2012) National Planning Policy Framework (NPPF) (in particular paragraph 35), available at: <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>
<sup>46</sup> ALP02 Local Plan 2031 Part 1: Strategic Sites and Policies

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

- 5.7.1 The estimate of site capacity is justified and deliverable in the plan period (1,200 dwellings) and in the long term (in excess of 4,000 dwellings, subject to the provision of appropriate infrastructure).
- 5.7.2 The Topic Paper 2: Site Selection (**TOP02.1**)<sup>47</sup> provides evidence of how site capacities have been derived, e.g. standard 25 dwellings per hectare (dph) has been applied with higher and lower densities applied to specific local circumstances where considered relevant.
- 5.7.3 The Council's Housing Trajectory (**HOU03.1**)<sup>48</sup> and Statement of Common Ground with the DIO (**SCG17**)<sup>49</sup> demonstrate that development of the site can begin in 2024/25 ahead of the release of the main barracks and that 1,200 dwellings can be delivered during the plan period. This is supported by the site development team's Delivery Document<sup>50</sup>, which states that development will commence in 2024/25, with 1,200 dwellings capable of being delivered within the plan period. The site development team's initial masterplanning work indicated that a total of approximately 4,500 dwellings could be accommodated in the longer term.
- 5.7.4 Detail of the phasing of the site is provided in the response to question 5.8.

<sup>&</sup>lt;sup>47</sup> **TOP02.1** Topic Paper 2: Site Selection (in particular paragraph 3.11 and footnote 24) <sup>48</sup> **HOU03.1** Housing Trajectory Update

<sup>&</sup>lt;sup>49</sup> **SCG17** Statement of Common Ground with Carter Jonas on Dalton Barracks (in particular paragraph 2.4)

<sup>&</sup>lt;sup>50</sup> Delivery Document is included within the DIO response to Reg 19, available at: <u>www.whitehorsedc.gov.uk/LPP2</u>

- 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 Council considers it realistic for 1,200 dwellings to be delivered on the site during the plan period.
- 5.8.2 In a letter from the DIO's Head of Estates to the then Acting Chief Executive of the Council (November 2017)<sup>51</sup>, confirmation was provided that development of the site can commence while the MoD remains in occupation of the main barracks. Subsequent discussions with the DIO indicate that development can commence in 2024/25, as is reference in the Council's Housing Trajectory (**HOU03.1**)<sup>52</sup> and the Statement of Common Ground with the DIO (**SCG17**)<sup>53</sup>.
- 5.8.3 The Council considers that the development of 1,200 dwellings to be built during the plan period will take place in the south of the site. This will inform the SPD which will provide further detail on the phasing of the comprehensive development beyond the plan period.
- 5.8.4 It is the Council's understanding that the Defence Infrastructure Organisation are involved in confidential discussions regarding the proposed relocation of the existing military personnel.

<sup>&</sup>lt;sup>51</sup> Letter is included within the DIO response to Reg 19, available at: <u>www.whitehorsedc.gov.uk/LPP2</u>

<sup>&</sup>lt;sup>52</sup> HOU03.1 Housing Trajectory Update

<sup>&</sup>lt;sup>53</sup> **SCG17** Statement of Common Ground with Carter Jonas on Dalton Barracks