

MATTER 5: Dalton Barracks

HEARING STATEMENT on behalf of Arnold White Estates Ltd

Examination of Vale of White Horse Local Plan 2031: Part 2 - Detailed Policies and Additional Sites

Project reference	GP 006	Date	9 June 2018
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1.0 INTRODUCTION

- 1.1 This is a Hearing **Statement** submitted to the Inspector holding the Part 2 Examination of the Vale of White Horse **Local Plan** (**LPP2**) 2031 in July 2018. It is submitted by Gardner Planning Ltd (**GPL**) on behalf or Arnold White Estates Ltd (**AWEL**) which is a development promoter with land interests in The Vale of White Horse (**VWH**) District. GPL/AWEL made a detailed response to the LPP2 Publication Version on 20.11.17.
- 1.2 This Statement responds to the Inspector's List of Matters and Questions (15.5.18) which are a starting point for the round-table hearing session.



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?

- 2.1 The Dalton Barracks proposal was a late entrant to the site selection process, first appearing in the Local Plan 2031 Part 2 Preferred Options March 2017.
- 2.2 LPP1 identified several sites suitable for removal of from the Green Belt, based on the Kirkham GB Study ¹but these did not include Dalton Barracks. Those not specifically allocated for development, and where VWH had made a procedural mistake by not specifically identifying the sites as "safeguarded land, the Inspector's report² (para 91) then rejected the submitted plan's proposal to delete the sites from the GB. This was a matter of principle rather than site specific objection, observing as follows:

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.

- 2.3 VWH has approached the GB release issue by commissioning two reports by Hankinson Duckett Associates:
 - Dalton Barracks, Green Belt Review: Exceptional Circumstances Assessment; Dalton Barracks (October 2017)³
 - Vale of White Horse District: Green Belt Study of Local Plan Part 2 Sites (October 2017)⁴
- 2.4 Clearly both were published well after the decision had been taken to allocate Dalton Barracks, thus justifying the decision rather than informing it.

¹ Vale Of White Horse District Council Green Belt Review Phase 3 Report: Amendments To Boundaries Of The Green Belt Around Inset Villages And New Inset Village At Farmoor Nov 2014

² ALP03

³ NAT01

⁴ NAT03



- 2.5 The essential balance between Green Belt policy and sustainability principles has already been raised in Matters 1 and 2. The purposes of the GB have remained largely unchanged since the Circular 42/55. NPPF para 80 gives the modern version:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.6 Almost any development of GB land is likely to offend the third purpose. Indeed, the second study looked at 18 sites. Of these, 11 rated encroaching on the countryside as 'high', including Dalton Barracks and a LPP1 site at Radley although further consideration by the authors revised Dalton Barracks as medium/low and none in terms of encroachment.
- 2.7 The plan attached to the Dalton Barracks GB Review (HAD 4) shows how Dalton Barracks fails the GB tests: 'to check the unrestricted sprawl of large built-up areas'; and 'to prevent neighbouring towns merging into one another.'
- 2.8 The plan shows the 'large built-up area' of Abingdon with a 'critical separation between settlements' of just 450m. The plan also shows Abingdon, Shippon, Cothill and Wootton all virtually merged together. The Review mistakenly takes the 'large built up area' to be Oxford, not Abingdon.⁵
- 2.9 The following extracts from the Report indicates that GB Purpose 2 is compromised:

... however the site forms a substantial part of the gap between Abingdon and Wootton. If the whole site were to be developed, the separation between Abingdon and Wootton would substantially reduce, which would subsequently affect the extent of open land between Abingdon and Botley (Oxford). This is particularly relevant for the open land within the airfield and for the land to the north-east of the site, which occupies the gap between the hamlet of Whitecross (to the east of the site) and Wootton (to the north). There is the potential for cumulative impacts of developments within the north-eastern part of this site and the development of Site 10 (Land to the north of Honeybottom Lane). ⁶

⁵ Dalton Barracks, Green Belt Review: Exceptional Circumstances Assessment; Dalton Barracks (October 2017) para 5.2.3

⁶ ditto para 5.2.3



Parcel 1E, in combination with the northern parts of 1F and 1D, form the separation between the barracks and Honeybottom Lane. This land and the land to the north of Honeybottom Lane (and the southern edge of Wootton) forms the critical separation between Whitecross, Wootton and any potential development at Dalton Barracks. These parts of the site have the highest contribution to Purpose 2 of the Green Belt.⁷

⁷ ditto para 5.2.7



3.1 No comments are made on this question in this Statement.



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?

- 4.1 There are some fundamental principles that should be published and open to examination before the LPP2 is able to demonstrate that Dalton Barracks:
 - is a sustainable self-contained site
 - has deliverable and certain transportation links to Oxford
 - maintains GB purpose 2 in terms of not representing urban sprawl or merging existing settlements.
- 4.2 These matters are essential to the consideration of principles of the site and cannot be left to a future non-examined SPD.



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.

5.1 The response to this question is virtually the same as for Question 5.3.



6.1 No comments are made on this question in this Statement.



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?

- 7.1 This question raises the topic of sustainability. LPP2 places very heavy reliance on this **proposed** connectivity for the allocation of Dalton Barracks.
 - 2.59 The District Council is working in partnership with Oxfordshire County Council to plan for substantial highway and public transport improvements within this Sub-Area. Plans include provision for **upgrading the A34 interchange at Lodge Hill; a north-bound bus lane between Lodge Hill and the Hinksey Hill interchanges on the A34**; and providing for **two new Park and Ride sites at Cumnor and Lodge Hill** (both close to Dalton Barracks) for accessing Oxford. Both of these Park and Ride sites will be connected to key destinations in Oxford City via a Rapid Transit System.
 - 2.60 An Abingdon Oxford Corridor Sustainable Transport Study has informed the sustainable transport provision which should support the proposed development at Dalton Barracks32. The improvements outlined in the study include the provision of a bus and cycle link from Dalton Barracks to the new Park and Ride site at Lodge Hill, which would provide a direct link from the proposed development to an interchange with services going in to the centre of Oxford and to other key destinations, such as the employment sites to the east of Oxford. The study also outlines the need for enhancements to the frequency of bus routes serving the site to reach 'turn up and go', or premium route, standard and improved pedestrian and cycle links from the site to Abingdon-on-Thames.
 - 2.61 The Council will continue to work with Oxfordshire County Council to ensure opportunities for public transport, walking and cycling in this area are maximised and are fully integrated with proposals for Dalton Barracks.
- 7.2 The Dalton Barracks Green Belt Study⁸ also seeks to deal with 'sustainability' in section 6. It repeats the transportation linkages 'opportunities' then adds:

To ensure that the principles of sustainable development are maintained throughout the masterplan process the District Council will draft a development SPD for the site. The SPD would cover the allocation in it's [sic] entirety and provide for housing, employment and community facilities well beyond the plan period.

and repeats that

To ensure that the principles of sustainable development are maintained throughout the masterplan process the District Council will draft a development SPD for the site.⁹

³ NAT01.2

⁹ NAT01.2 Dalton Barracks, Green Belt Review: Exceptional Circumstances Assessment; Dalton Barracks (October 2017) paras 6.1.7, 6.1.10



- 7.3 The question could be interpreted to mean: are these proposals an essential pre-requisite for the sustainable development of Dalton Barracks or would the site be acceptable without them.
- 7.4 Unlike the **existing rail link** into Oxford (e.g. the Radley Station) these are **proposals** which are not yet delivered or guaranteed to be delivered, or are the subject of a future SPD which should be drafted before the site is given a 'blank cheque'. They should be delivered or guaranteed to be delivered before development commences on site, and a realistic phasing agreed within LPP2.
- 7.5 The Systra Sustainable Transport Study¹⁰ for the Abingdon to Oxford Corridor states that "As shown in Figure 7, Radley Station serves as the only rail station within the Abingdon and Oxford fringe sub-area."¹¹ A curious comparison is made in the Study: "Radley Station is within a 1km walk from the residential areas of Radley"¹² then "The Dalton Barracks development site is within a 15 minute cycle of Radley Station."¹³ The reality is that Radley Station is within 500m of the residential areas (including our proposed site of Radley South), but 5km away from the Dalton Barracks site. The comments in the October 2017 Sustainable Transport Study, like many in the October 2017 Green Belt Studies, demonstrate the bias toward Dalton Barracks and attempt to build a case for the already agreed strategy, rather than to seriously look at sustainable alternatives.

 $^{^{10}}$ TRA05

¹¹ TRA05 Systra Sustainable Transport Study for the Abingdon to Oxford Corridor (Oct 17) para 2.4.21

¹² ditto 2.4 24

¹³ ditto 2.4.25



8.0 QUESTIONS 5.7, 5.8

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

- 8.1 Clearly, 1,200 homes would not provide the schooling, jobs, retailing and other services nor the extensive transportation infrastructure needed to make the site sustainable **or viable**. LPP2 seems to grasp Dalton Barracks as its 'magic bullet' for solving the Oxford unmet housing need problem and avoiding allocating smaller GB sites as extensions to appropriate settlements, which may be in the GB but are more sustainable and deliverable.
- 8.2 The basic problem is that Dalton Barracks is MoD land which was only recently announced to be released for development, but not until the end of the plan period. The site was identified for disposal in 'A Better Defence Estate' published by the Ministry of Defence in November 2016¹⁴. Unfortunately, the date for disposal is stated to be "2029"¹⁵. A 'reprovision plan'¹⁶ to relocate 2 of the military units using the site has still not yet been confirmed. However, LPP2 considers that:

Around half of the growth envisaged within the plan period can be delivered onsite even before the military units are re-located. However, it is anticipated that the military units will be re-located no later than 2026. ¹⁷

8.3 This is contradicted by the Statement of Common Ground between VWH and Carter Jonas (on behalf of the Defence Infrastructure Commission/MoD)¹⁸ which shows that only 200 dwellings (17% of the total) can be delivered by mid 2026:

The estimated development trajectory is as follows:

Total Dwellings	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
1,200	50	100	200	200	200	225	225

¹⁴ OCD01

¹⁵ 'A Better Defence Estate' p24

¹⁶ a term used in the 'Defence' document which seems to mean 'relocate'

¹⁷ LPP2 para 2.54

¹⁸ SCG17 March 2018



- 8.4 To begin delivery in 2024/25 would require the LPP2 and SPD (if that is the process agreed by the Inspector) to be adopted the LDS February 2018 shows LPP2 being adopted by December 2018, which would seem to be optimistic. LPP1 took 10 months post Examination to adopt so possibly LPP2 by May 2019. An SPD could take a year to prepare, consult and adopt even without any kind of examination no timetable is given in the LDS. On the adoption of that (say May 2020) the planning application process begins.
- 8.5 A study by Lichfield ¹⁹ in 2016 of delivery of large sites showed a wide variation of obtaining planning approval after the Plan process had completed of between 2 and 6 years²⁰, with an average of 5.5 years for sites between 1,000 and 2,000 units (and none less than 2 years). Post permission, such sites took a year to commence delivery.
- 8.6 An earlier 2005 Study by Colin Buchanan and Partners²¹ showed the average 'permission period' for sites 1,000 2,000 to be 4.7 years. The average time between application submission and the first year of build is 5 years. Extracts from the Lichfield and Buchanan studies is **Appendix 1** to this Statement
- 8.7 In the case of Dalton Barracks this period may be longer there would be preparatory work, including contaminated land restoration of an MoD operational site, access formation, site clearance and demolition.
- 8.8 Realistically, therefore it could be some 7 years after adoption of the SPD before any homes were delivered say mid 2027.
- 8.9 The trajectory in the SCGsummises that 1,200 could be delivered in the plan period. However, this bears no comparison to the real world and commercial realities. The Lichfield Study showed that average build rates were 130 p.a. I am informed that the National Housebuilders sales rates per outlet are more likely to be around 40 units pa., so in the unlikely event that there were three outlets on this site from the beginning of housebuilding activity, then even the Lichfield figure of 130 units per annum would not be achieved

¹⁹ Start to Finish How Quickly do Large-Scale Housing Sites Deliver? Nathaniel Lichfield and Partners (November 2016)

²⁰ ditto Fig 3 p7

²¹ Housing Delivery on Strategic Sites Research Study Countryside Properties Colin Buchanan and Partners (December 2005) Table 1 p7



- 8.10 The housing completion figures put forward are not realistic and take no account of the markets ability to 'absorb' new units. Given the inevitable delay referred to above, and market realities, then a figure of less than 400 completions may be achieved by 2031 if the site came forward.
- 8.11 In October 2017 Vale of White Horse/South Oxfordshire DC's published the 'Housing Delivery Strategy'²². Dalton Barracks is a key, but difficult, site which is not mentioned in the Strategy, so clearly no assistance is envisaged on delivery. In response to the GPL submissions on this point an email from Principal Development Officer stated that "the aim of the draft Joint Housing Delivery Strategy is to work alongside Vale's Local Plan 2031 Pt 2 with a focus on general delivery of new build homes and is not site specific." I pointed out that that cannot be so because Didcot Garden Town and Berinsfield are mentioned several times.
- 8.12 In July 2017 VWHDC issued a press release stating that "Building work on the long-awaited Grove Airfield development could get underway soon". It says that outline planning permission has finally been granted. It will require further approval of reserved matters (another year?) before 'building work' can start. My research has found that:
 - the former airfield closed in 1947
 - the site was allocated (Policy H1) In the Draft Oxfordshire Structure Plan in 2003
 - the site was allocated for development in the Adopted Local Plan adopted in July 2006
 - the outline planning application (P12/V0299/0) was submitted in February 2012
 - this was considered by the Planning Committee in 2013
 - Outline consent was granted in July 2017

This is not only 70 years after the airfield closed, but more importantly 14 years after it first appeared in a planning policy document and 5 years after submission of the planning application.

8.13 AWEL has experience of the timescale for developing MoD land because of development land interests around Leighton Linslade, Bedfordshire. RAF Stanbridge is a former MoD site in southern Leighton Linslade which was declared "no longer required" in 1991²³, and the latest CBC Trajectory²⁴ is that material development will not commence until 2017/18 - a total of 26 years.

²² HOU04

²³ Post-Options Restructuring of Support (PROSPECT) MoD March 1991

²⁴ CBC Annual Monitoring Response 2015/16 Dec 2016



8.14 Finally, a response to my Freedom of Information request of 24.5.18 has just been received from the DIO on 15.6.18²⁵ which states:

There has been no update to 'A Better Defence Estate' and the estimated disposal date of Dalton Barracks in 2029. No decision has been made at this time as to whether the site will be sold as a whole or in phases.

8.15 There are now three versions (LPP2, MoU and most recently the DIO) of when or if Dalton Barracks can deliver any housing in the LP2 plan period. This Statement submits that it is the official DIO letter of 15.6.18 is not only the most recent, but should be considered the definitive version. Any reliance on when or if Dalton Barracks can deliver any housing in the LPP2 plan period must now be in serious doubt.

²⁵ Attached as Appendix 2



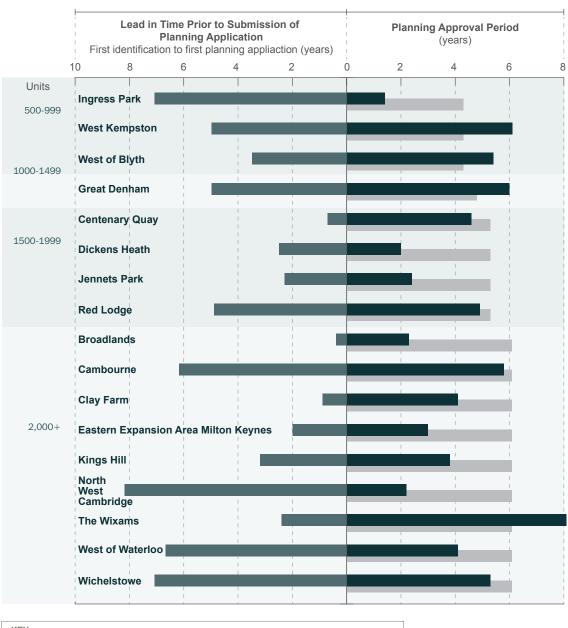
Matter 5 VWH Local Plan Examination Part 2 Gardner Planning Ltd on behalf of AWEL

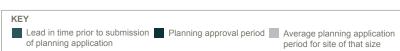
APPENDIX 1

Extracts from Lichfield and Buchanan Studies



Figure 3: Average lead-in time of sites prior to submission of the first planning application





Source: NLP analysis

The Planning Approval Period: Size Matters

The term 'planning approval period' in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government's Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis his is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3-6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

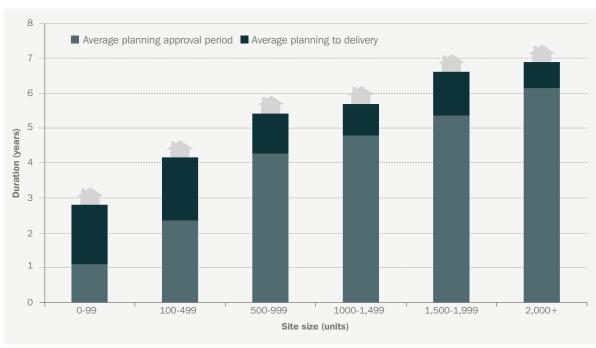


Figure 4: Average planning approval period and delivery of first dwelling analysis by site size

Source: NLP analysis

Housing Delivery on Strategic Sites

Research Study

Countryside Properties
December 2005



2. Methodology

2.1 Introduction

- 2.1.1 This study has focused on the rate of housing development where strategic sites have been grouped into three categories:
 - Comprising 1,000 1,999 dwellings
 - Comprising 2,000 or more dwellings
- 2.1.2 Sites comprising 3,000 or more dwellings were also assessed in as part of formulating for a future housing trajectory.
- 2.1.3 Data has been collected, firstly for the period 1980 to 2004 (the most recent dwellings completions data set available) and secondly for of the RSS14 plan period 2001 to 2021.
- 2.1.4 Six case studies from the study area have been examined in further detail to help develop understanding as to how strategic sites have developed as they have.
- 2.1.5 This study focuses on the East of England, but data has been included on some strategic sites identified but which are located outside of the East of England.

2.2 Data Sources

Strategic Sites – developed and under development

- 2.2.1 All local development plans and structure plans within the East of England were reviewed. Where possible, old plans were reviewed as well as current and emerging local plans. However, no plans published before 1990 were available. Emerging plans or the technical papers that underpin them were reviewed to identify strategic sites that will be developed (or could be developed) in the period 2001 to 2021.
- 2.2.2 All county councils and local planning authorities within the East of England region were asked to provide the following information:
 - 1. Strategic housing (or mixed use) developments that have been or are currently developed achieved in the district/borough since 1980? Include any emerging strategic sites that are currently being considered either as a planning application or as an allocation in an emerging local plan.
 - 2. When was the site first allocated in the local plan?
 - 3. When was planning permission granted?



- 4. When was the application minded to be approved and when was the s.106 agreement signed?
- 5. List of land uses and quantum of development (i.e. number of dwellings, employment floor space and other uses)?
- 6. What rate of housing development has been or is being achieved (in dwellings per annum)?
- 7. Is the development now built out? Does it match the original planning consent?
- 2.2.3 This information was requested to authorities via e-mail under the Freedom of Information Act. Next, planning departments were contacted by telephone with follow-up e-mails to request further, more specific, information.
- 2.2.4 In addition, for identified strategic sites, information was sought on previous land use, proposed mix of uses and future proposals through internet searches. Web sites of councils, house builders and developers as appropriate were reviewed. However, web searches and reviews of developer web sites were generally sparse but did provide some useful background information.
- 2.2.5 The Eastern Region departments of the Home Builders Federation and English Partnerships were also contacted. The Home Builders Federation were unable to assist in data collection because they do not monitor or keep records of large sites. English Partnerships have not responded.
- 2.2.6 A Compass search was undertaken of all strategic sites in England which were subject to an inquiry/appeal since 1980. Data on the exact quantum of development sought was not always available and the number amount of inquiries/appeals held on the data base for the period 1980 to the late 1980's appeared to be limited or incomplete. Nevertheless the number of sites comprising more than a 1,000 dwellings was surprisingly small, 21 in all, of which only 3 were granted planning permission.. Of the 21 sites, 8 comprised sites of more than 2,000 dwellings and only 1 of these was approved. Within the East of England region, the Compass search provided information on 7 sites of which one was approved. The list of Compass sites is set out in Appendix 1.

Strategic Sites – potential permissions and allocations

- 2.2.7 Data on allocations that will or could be developed within the Draft RSS 14 plan period was collected at the same time as the above information. Most development plans in the Eastern Region, plan for at least part of the forthcoming RSS plan period. Hence, some strategic sites are already allocated and are under development, or are allocated and are planned to commence development in the RSS plan period. For these sites the same information as shown at paragraph 2.2.1 was requested.
- 2.2.8 For forthcoming sites, i.e. those that need to be allocated in order to meet the new targets in the period to 2021, information is less robust and councils do not have definitive plans upon which they can rely. Advice on potential strategic sites is contained in draft RSS14 and this has proven to be a



Matter 5

VWH Local Plan Examination Part 2
Gardner Planning Ltd on behalf of AWEL

APPENDIX 2

DIO letter 15.6.18



Secretariat
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www.gov.uk/DIO

Geoff Gardner geoff@gardnerplanning.com

15 June 2018

Ref. FOI 2018/07082

Dear Mr Gardner,

Thank you for your email of 24 May 2018 requesting the following information:

"Could you please provide information under the 'Freedom of Information' procedure regarding the month and year, or at least year, when Dalton Barracks in Oxfordshire will be disposed of and/or become available for development, either as a whole or, if in phases, the areas and dates when they will become available. In 'A Better Defence Estate' November 2016 page 26 it is stated that the 'estimated date of disposal' will be 2029. Is this still the year, if not please update and if the MoD has published such an update please provide that."

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOIA).

A search for the information has now been completed within the Ministry of Defence (MOD) and I can confirm that all the information in scope of your request is held.

The information you have requested can be found below.

There has been no update to 'A Better Defence Estate' and the estimated disposal date of Dalton Barracks in 2029. No decision has been made at this time as to whether the site will be sold as a whole or in phases.

Under Section 16 of the Act (Advice and Assistance) you may find it helpful to note that you can find details of MOD present and future disposal properties that are in the public domain on the following website:

https://www.gov.uk/government/publications/disposal-database-house-of-commons-report.

If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-

IR@mod.gov.uk). Please note that any request for an internal review should be made in writing within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at https://ico.org.uk/.

Yours sincerely,	Υc	วน	rs	sir	nce	re	ly	,
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DIO Secretariat

email to 'CIO-FOI@mod.uk'

24.5.18

Could you please provide information under the 'Freedom of Information' procedure regarding the month and year, or at least year, when Dalton Barracks in Oxfordshire will be disposed of and/or become available for development, either as a whole or, if in phases, the areas and dates when they will become available.

In 'A Better Defence Estate' November 2016 page 26 it is stated that the 'estimated date of disposal' will be 2029. Is this still the year, if not please update and if the MoD has published such an update please provide that.

Please confirm this request has been received and accepted, and the date when you can provide this information.

Geoff Gardner
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