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Your ref:
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Planning Policy Team
Vale of White Horse District Council

BY E-MAIL ONLY

1st April 2019

Dear Sir/ Madam

**VALE OF WHITE HORSE LOCAL PLAN (PART 2) – PROPOSED DRAFT MAIN MODIFICATIONS
COMMENTS ON BEHALF OF CEG**

1 INTRODUCTION

- 1.1 This letter responds to the Proposed Draft Main Modifications to the Vale of White Horse Local Plan Part 2. The comments are made on behalf of CEG, who have secured outline planning permission for 950 dwellings at North Abingdon, and control adjacent land considered suitable for further development ('Abingdon North').
- 1.2 The comments set out below principally address the Main Modifications that relate to the proposed allocation of land at Dalton Barracks. We have fundamental concerns with the compromise position that the Council is seeking to justify, and do not believe that the allocation (as proposed to be modified) is either justified or consistent with national policy (NPPF, paragraph 35).

2 BACKGROUND

- 2.1 Igloo Planning represented CEG at the Local Plan Part 2 Examination Hearing sessions. The Statement submitted for the Dalton Barrack hearing session made the following points:
- Dalton Barracks does not need to be removed from the Green Belt to enable its redevelopment. As and when the site becomes surplus to requirements, it could be redeveloped as a major developed site in the Green Belt (in accordance with the revised NPPF). Part of the reason for not taking such an approach, is that to facilitate the delivery of 1,200 new homes 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.

- The proposed new Green Belt boundary follows an arbitrary line, not in accordance with paragraph 85 of the NPPF (paragraph 139 (f) of the revised NPPF), which requires boundaries to be defined using *'physical features that are readily recognisable and likely to be permanent'*. Indeed, the arbitrary nature of the proposed new Green Belt boundary has become even clearer, with the Main Modifications proposing a different new Green Belt boundary.
- 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. Consequently, the evidence base for Local Plan Part 2 does not provide an adequate assessment of 'reasonable alternatives'.
- Development at 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. 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.
- 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. 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.
- The proposed bus and cycle links from Dalton Barracks to the Lodge Hill Park and Ride were 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. The Draft Proposed Main Modifications delete the safeguarding of land for these proposed links (see below).

2.2 The above summary is presented for ease of reference, and sets the context for the comments on the Proposed Draft Main Modifications below.

3 COMMENTS ON THE PROPOSED DRAFT MAIN MODIFICATIONS

- 3.1 The Inspector's Post Hearings letter dated 30th October 2018 advised that the Local Plan Part 2 could not be found sound as presented, as the exceptional circumstances for the release of Green Belt land sufficient to accommodate up to 4,500 new dwellings at Dalton Barracks had not been demonstrated.
- 3.2 Whilst the Inspector explained at some length the further work needed to seek to justify a new settlement at Dalton Barracks containing up to 4,500 new dwellings (inferring this was the preferred 'solution'), paragraph 17 of the Inspector's letter went on to state:

'Should the Council not wish, for whatever reason, to pursue the proposals for Dalton Barracks on the basis of paragraph 12-16 above, an alternative approach which may

achieve soundness could be to allocate a specific site (or sites) at Dalton Barracks for the housing proposed during the plan period, with Green Belt designation deleted from the site(s) concerned and no more. In this case there would be no presumption that any further development would take place on the wider site unless brought forward and justified in a future local plan. Under this option the evidence would need to be reworked to demonstrate that the proposal would compromise suitable standalone sustainable development in its own right.'

- 3.3 The Council confirmed by letter dated 20th November 2018 that they would look to pursue this alternative approach, although contrary to the Inspector's comments quoted above, the Draft Proposed Main Modifications propose to release more land from the Green Belt than is needed to accommodate the housing proposed in the Plan period. In addition to the area proposed for allocation, the Council are still proposing to release the whole of the main developed area at Dalton Barracks from the Green Belt – which enables further land to be developed without the need for allocation (or indeed justification) in a future Local Plan.
- 3.4 **We have reviewed the Draft Proposed Main Modifications (and related updated evidence base) and believe that the proposed Dalton Barracks allocation is not justified or consistent with national policy.**
- 3.5 We would suggest there are two main ways of appraising the modified Dalton Barracks allocation. The first approach ('Approach 1') is to take the Local Plan Part 2 (as proposed to be modified) at 'face value' and consider the merits of a standalone 1,200-unit scheme on largely open, undeveloped land, adjacent to a Smaller Village, and on the wrong side of the A34 in terms of access to Abingdon-on-Thames. The second, and more realistic approach ('Approach 2') is to consider the merits and impacts of a larger scheme (i.e. 1,200 dwellings in the current Plan period, with additional development in the period post 2031). Whilst the area of land proposed to be removed from the Green Belt at Dalton Barracks is now smaller than proposed in the Submission Draft Local Plan Part 2 (see **Main Modification 4**), the Council is still proposing to remove the main developed area of Dalton Barracks from the Green Belt (in addition to the allocated area), paving the way for delivery of many more than 1,200 new dwellings on the Dalton Barracks site.

Approach 1

- 3.6 A brief review of the Council's exceptional circumstances case demonstrates the reliance placed on the whole of the Dalton Barracks site, in seeking to justify the proposed Green Belt land release. The Council cite the following exceptional circumstances (Green Belt Review: Exceptional Circumstances Assessment: Dalton Barracks, Hankinson Duckett Associates, October 2017):
- The availability of a highly sustainable and significant site for development, not previously available, and so not previously considered either by the Oxfordshire Growth Board as a potential site to accommodate unmet housing need for Oxford, or by the Vale of White Horse through preparation of the Local Plan 2031: Part 1. 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, including for Dalton Barracks and the

surrounding land, which demonstrates that its removal 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 contains a large area of brownfield (previously developed land).

- 3.7 In terms of the first bullet, we have always held the view that Dalton Barracks, adjacent to a Smaller Village, and separated from Abingdon-on-Thames by the A34 is a not a 'highly sustainable' location. We would accept that it can potentially be made more sustainable with significant investment in on-site facilities and services, and through significant investment in public transport infrastructure and off-site facilities for pedestrians and cyclists, but the scope for such investment significantly reduces when the planned scale of development reduces from up to 4,500 dwellings, down to just 1,200 new dwellings.
- 3.8 In a similar vein in relation to the third bullet point above, we would question the potential to develop a highly sustainable new community with 'excellent public transport, walking and cycling connectivity to Oxford and Abingdon-on-Thames', when the assumed scale of development has reduced so significantly. In terms of the fourth bullet, the smaller allocated area now includes largely open, undeveloped land, with very limited existing built form.
- 3.9 **We would suggest that Main Modification 4, paragraph 2.64, which removes reference to the potential for more development at Dalton Barracks in the longer-term, undermines the exceptional circumstances case presented by the Council.**
- 3.10 The Sustainability Appraisal Report Addendum (January 2019) considers the likely impacts of the Draft Proposed Main Modifications. There are a number of areas where the Main Modifications result in a less positive assessment of the Dalton Barracks site – most notably as a result of the deletion of provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site, and adjustments to the references to education provision on the Dalton Barracks site. We feel it surprising that the Sustainability Appraisal Report Addendum doesn't give more consideration to the reduced range of facilities and services that will be deliverable at Dalton Barracks, if the assumed scale of development is limited to just 1,200 new dwellings.
- 3.11 **Overall, we do not believe that a standalone allocation at Dalton Barracks for 1,200 dwellings, on largely open, undeveloped Green Belt land, adjacent to a Smaller Village, will deliver sustainable development and is therefore contrary to national policy. A greater critical mass is required to make development at Dalton Barracks reasonably sustainable, and the impacts of this greater critical mass (including in terms of air quality and transport matters) need to be fully and properly tested through the Local Plan Part 2 process.**

Approach 2

- 3.12 As above, **Main Modification 4** (paragraph 2.64) removes reference to the potential for in excess of 4,000 dwellings at Dalton Barracks, subject to the provision of appropriate infrastructure (paragraph 2.64). We would suggest that in practical terms, this modification changes nothing.
- 3.13 **Whilst the Local Plan Part 2 might now be silent on the longer-term potential of Dalton Barracks, it is still the case that the MoD intends to vacate the site, and as part of their disposal strategy, they will still be seeking to ensure that the delivery of new housing on the site is 'optimised'. The Council's decision to propose allocation of the open, largely undeveloped land at Dalton Barracks for some 1,200 dwellings is inextricably linked to the MoD's decision to vacate the whole of the Dalton Barracks site (and the future opportunity to redevelop the central, developed core of the site). The Council should not be allowed to artificially sever this link, preparing and presenting evidence that supports the delivery of just 1,200 dwellings at Dalton Barracks, whilst ignoring the redevelopment capacity of the central, developed core of the site.**
- 3.14 The proposed modifications to Core Policy 8b (**Main Modification 4**) allude to the Council's intended approach, once the Local Plan Part 2 has been adopted. A new Supplementary Planning Document is to be prepared, which will '*...ensure the new housing allocated at Dalton Barracks is considered in the context of a comprehensive approach to the Masterplanning of the site.*' This amendment maintains reference to the wider site, and the need for a comprehensive masterplan, which for sound planning reasons must include consideration of the redevelopment potential of the main developed area at Dalton Barracks - to be released from the Green Belt, but not allocated for redevelopment.
- 3.15 **We are concerned that the Council is seeking to 'side step' central issues that should be addressed in the forum of the Local Plan Part 2. We believe the Council needs to give proper consideration to the transport and air quality impacts arising from more than 1,200 new dwellings at Dalton Barracks, as the Local Plan Part 2 (as proposed to be modified) clearly anticipates the delivery of more than 1,200 new dwellings on the Dalton Barracks site, even if the explicit reference to longer-term potential has been deleted from the Plan. Without the aforementioned evidence, we do not believe that the proposals for Dalton Barracks (which include the allocation for 1,200 new dwellings and the release of the main developed area from the Green Belt) are justified.**
- 3.16 Finally, it is probably helpful to contrast the position with the current Local Plan Part 2, with the approach that could be taken if the main developed part of the Dalton Barracks site was available for redevelopment now. The Council could allocate this area for redevelopment in the Local Plan Part 2, and leave the adjoining largely open, undeveloped land in the Green Belt. In such a scenario, the Council wouldn't be committing explicitly (or indeed, implicitly) to additional development at Dalton Barracks, with any additional development, beyond the Plan period, only able to come forward through a future Local Plan review. The control here is that only through a Local Plan review could the further land be released from the Green Belt, and in going through this process, there would be the opportunity to properly assess the impacts of the additional development, including in relation to air quality and transport.

3.17 This approach would comply with the Inspector's advice on a possible alternative way forward (see quote under paragraph 3.2 above).

Please do let us know if you have any queries regarding the above.

Yours sincerely,



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Director



Cc Jonathan Wood, CEG

Enc Completed Response Form