

Planning

PLANNING POLICY MANAGER: HOLLY JONES



**Vale
of White Horse**

District Council

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20 November 2018

Dear Mr Reed,

Vale of White Horse Local Plan 2031 Part 2 (LPP2): Examination

Further to your letter to the Council dated 30 October 2018 concerning the Vale of White Horse Local Plan 2031 Part 2 (LPP2) Examination, please find the Council's response set out below.

The Council provided an initial response dated 2 November 2018 and note that you consider that many aspects of the plan can be considered to be 'sound', including for example, the Council's Duty to Co-operate, and the approach to the apportionment of the unmet housing need for Oxford to be addressed within the Vale. The Council also acknowledge the expectation that modifications will be required to the plan and look forward to receiving your recommendations on these matters in due course.

In terms of the issue concerning the proposed allocation at Dalton Barracks and your finding that this needs further consideration, the Council has given this matter due attention and the proposed approach has been subject to consideration by both Cabinet and Council.

Your letter dated 30 October 2018 made it clear that you consider that the proposal to release the whole Dalton Barracks site from the Green Belt but to only allocate a relatively small quantum of development within the plan period up to 2031 is ambiguous. Your letter made it clear that there were three options available, namely:

- 1) Update the evidence base to support an unambiguous proposal at Dalton Barracks for a new settlement of up to 4,500 dwellings, albeit on the basis that only an estimated 1,200 dwellings would be completed during the current plan period

- 2) Allocate a specific site (or sites) at Dalton Barracks for the housing proposed during the plan period, with the 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, or
- 3) Delete the site altogether and put forward replacement allocations elsewhere.

The Council is mindful of the substantial evidence already published at the Regulation 19 stage of the plan-making process and submitted to the Secretary of State in February 2018 that supports the delivery of around 1,200 dwellings at the Dalton Barracks site within the plan period to 2031. This information includes the Delivery Document prepared by the Site Promoter that includes considerable detail of how this development would come forward, including land areas and phasing. The Council note that this evidence has also already been subject to detailed consideration through the Local Plan examination hearings.

On this basis, the Council is of the view that your Option 2, i.e. a 1,200 dwelling scheme on the Dalton Barracks site, is already supported by substantial evidence. It would of course be necessary to make appropriate modifications to the plan to remove reference to any longer-term potential for the wider site and make adjustments to the masterplan to take account of your comments, such as removing the MOD Playing Fields. The Council has appended a possible modification to Core Policy 8b: Dalton Barracks that is hopefully of assistance in this regard (**Appendix 1**). The Council has also appended a very simple summary that signposts the existing evidence in support of a proposal for a 1,200 dwelling scheme at the Dalton Barracks site (**Appendix 2**).

Whilst the Council believes that the evidence already submitted is robust and proportionate to support a Local Plan process, the Council will prepare additional information to address your specific points relating to transport and air quality. The Council will advise on the timetable for this work separately.

The Council would of course be happy to assist further should this be helpful, but otherwise look forward to hearing from you on your proposals for the next steps for taking this matter forward.

Yours sincerely,



Holly Jones
Planning Policy Manager

Appendix 1: Proposed draft modification to Core Policy 8b: Dalton Barracks Comprehensive Development Framework

Core Policy 8b: Dalton Barracks Comprehensive Development Framework **STRATEGIC ALLOCATION**

All new development at Dalton Barracks will be guided by a comprehensive **APPROACH TO MASTERPLANNING** development framework.

The new housing allocated at Dalton Barracks will be provided to an exemplar standard and following Garden Village principles to ensure the potential for highly sustainable and accessible development is fully realised. The **new settlement DEVELOPMENT** will form a mixed-use community incorporating on-site services and facilities, including **new schools EDUCATION PROVISION**, a local centre, providing local opportunities for employment and ensuring excellent public transport, cycleway and footpath connections to Oxford and Abingdon-on-Thames. This development will come forward in accordance with Core Policies 8a and 8b and the Site Development Template set out in Appendix A.

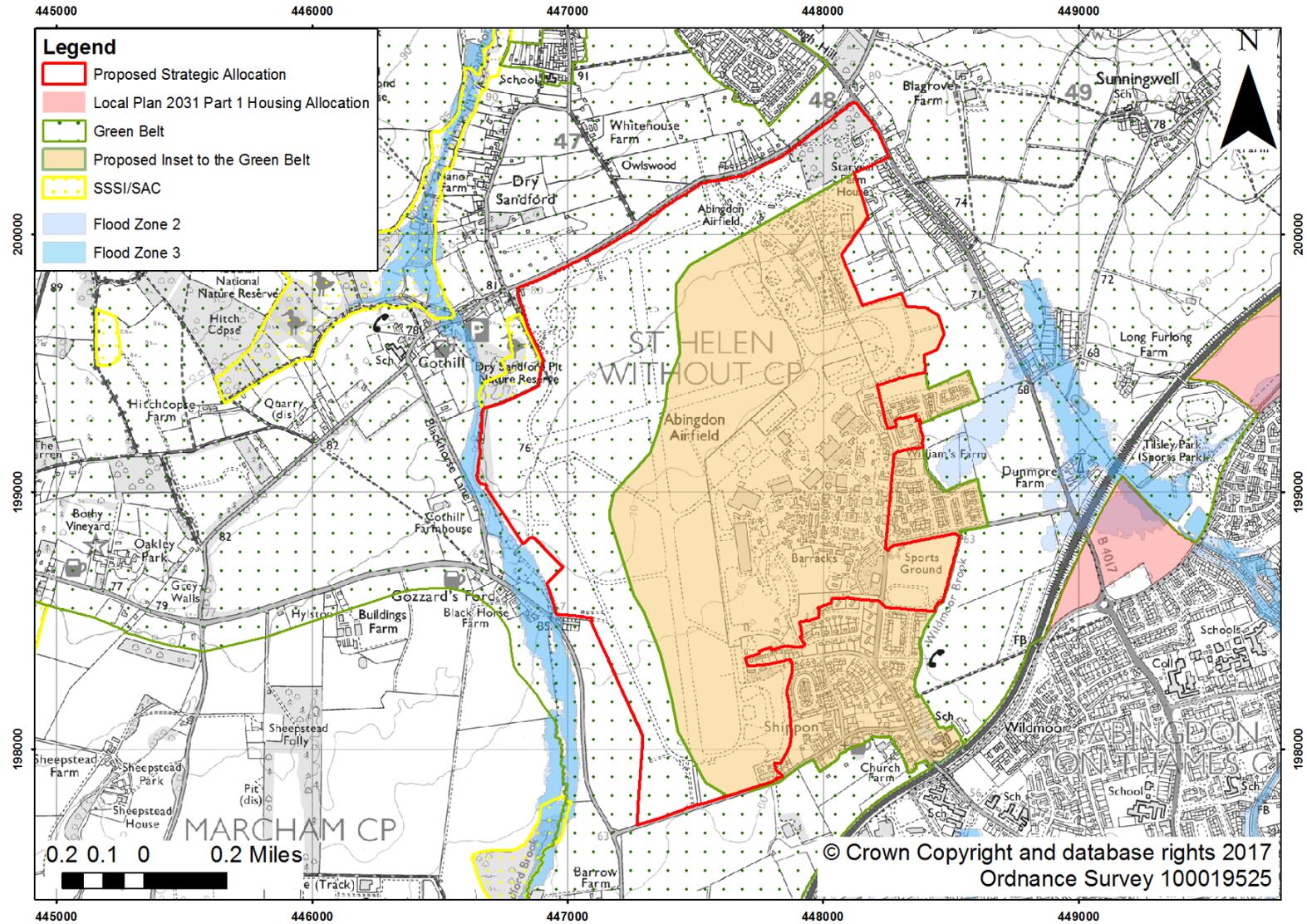
The site is removed from the Oxford Green Belt in accordance with Core Policy 13a. The site area, however contains a **N large** area of land that will remain within the Oxford Green Belt and any development on this area will be limited to Green Belt-compatible development. This area will include **a substantial Country Park PARKLAND**, located on the western **AND NORTHERN** side **S** of the site that should be planned for as part of the **OVERALL MASTERPLANNING FOR THE SITE** comprehensive development framework.

Proposals for development at Dalton Barracks must demonstrate how they contribute towards a comprehensive approach to **MASTERPLANNING** development.

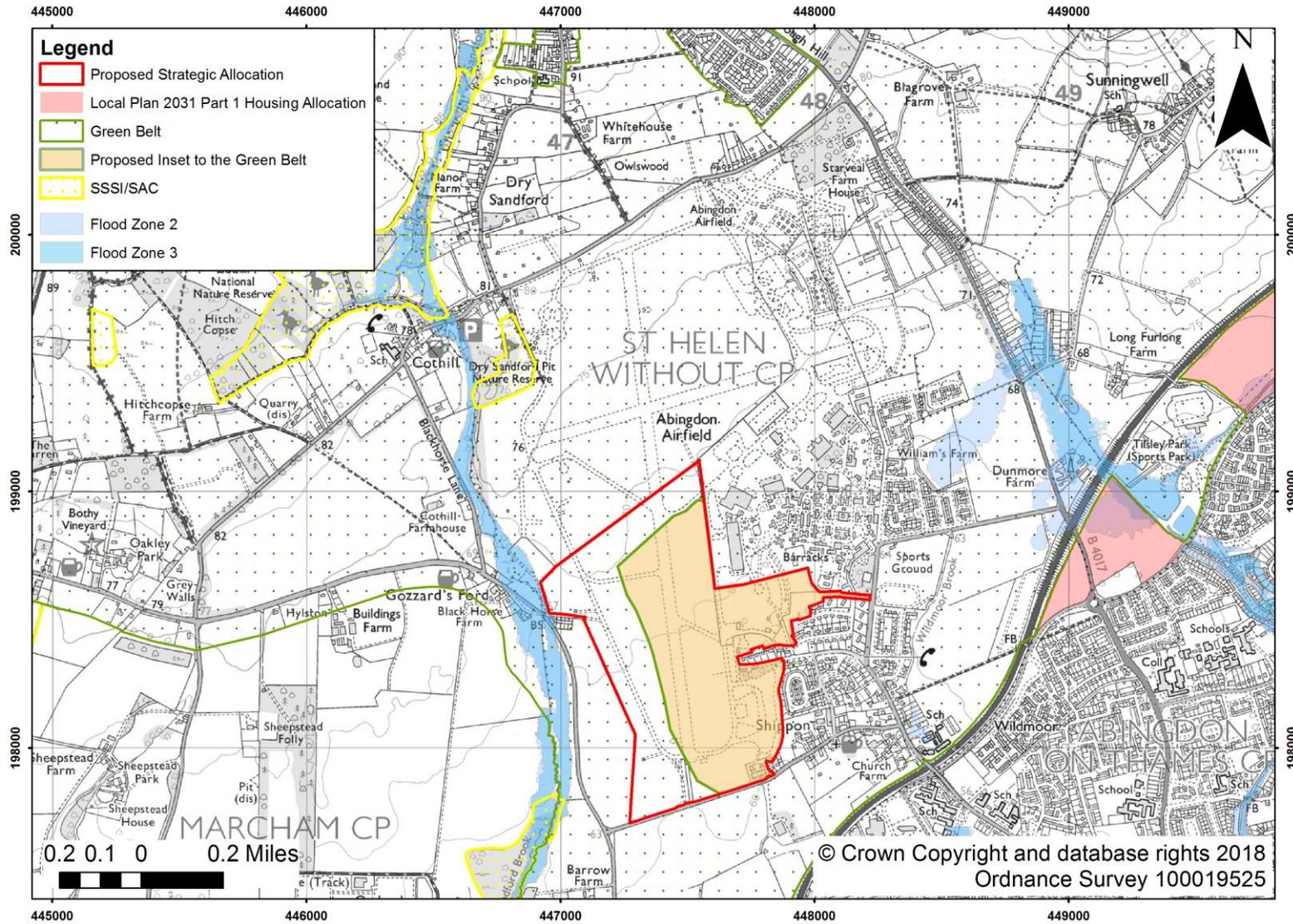
The Council will continue to work with the Defence Infrastructure Organisation, Oxfordshire County Council, Natural England and other relevant stakeholders to **ENSURE prepare** a comprehensive **APPROACH TO MASTERPLANNING** development framework for the site. Additional guidance will be provided by a comprehensive development framework that will be published as a Supplementary Planning Document and will ensure **THE NEW HOUSING ALLOCATED AT DALTON BARRACKS** proposals are **IS** considered in the context of a comprehensive approach to the **MASTERPLANNING OF THE SITE** **whole site**, including:

- i. the development is in accordance with the requirements of a travel plan for the **whole** site to make the necessary contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling.
- ii. the development is in accordance with and makes the necessary contributions to a comprehensive landscape plan for the **whole** site, including the provision of **PARKLAND a Country Park** of at least **80 30** hectares.
- iii. proposals for new development and redevelopment should **be** demonstrated **d** that there would be no adverse impact on Cothill Fen SAC and protection for the SSSI located to the west of the site, **and**
- iv. proposals for buildings and structures (including their extensions) will not unacceptably harm the character and appearance of the surrounding area, taking into account their location, scale, bulk and height, **AND**
- v. **ANY EXTERNAL LIGHTING SCHEME MUST HAVE A MINIMAL IMPACT IN TERMS OF LIGHT POLLUTION.**

Map showing the proposed strategic allocation at Dalton Barracks as submitted in the Local Plan 2031 Part 2 in February 2018



Map showing the Council's proposed modification to the site boundary for Dalton Barracks following the Inspector's letter dated 30th October 2018



Appendix 2: Signposting of existing evidence to support proposed development at Dalton Barracks

Consideration	Evidence	Justification
Landscape	Landscape Capacity Study (NAT07)	Dalton Barracks is site 22. The entire site has been assessed as set out on pages 93-94 which includes the site for 1,200 dws. This assessment demonstrates the site for 1,200 dws has high capacity for development.
Flooding	Strategic Flood Risk Assessment (WWF03.2)	The entire site has been assessed as set out on page 40-42 which includes the site for 1,200 dws. The assessment demonstrates the site for 1,200 dws has low fluvial flooding risk and some risk of surface water pooling in Shippon, to the south of the site which can be mitigated. The conclusion does not change for the site of 1,200 dws.
Ecology	Habitats Regulations Assessment (CSD08.4)	Site capacity of 1,200 dws has been assessed through the Habitats Regulations Assessment consistent with the current proposal. The mitigation measures proposed through the HRA will still apply including a Suitable Alternative Natural Greenspace (SANG) of 22ha to mitigate potential for effects on Cothill Fen SAC through recreational pressure. The site for 1,200 dws has capacity to incorporate a SANG of at least 22ha.
Water and Wastewater	Water Cycle Study (WWF02. and WWF02.1)	Site capacity of 1,200 dws has been assessed consistent with the current proposal, as set out in Appendix G of WWF02. The assessment concludes upgrades are unlikely to be required to the wastewater network. The conclusion does not change for the site of 1,200 dws.
Oxford Green Belt	Green Belt Review: Exceptional Circumstances Assessment (NAT01) Green Belt Study of LPP2 Sites (NAT03) Green Belt Study: Land Surrounding Dalton Barracks (NAT02)	The entire site at Dalton Barracks has been assessed in terms of its contribution to the Oxford Green Belt as set out in NAT01 and NAT03 which includes the current proposal for 1,200 dws.
Sustainability Appraisal (SA)	Sustainability Appraisal (CSD09 to 09.1)	Site capacity of 1,200 dws has been appraised through the Sustainability Appraisal consistent with the current proposal. The SA identified Dalton Barracks as a constant across the reasonable alternatives reflecting the increased certainty of delivery and the sustainability credentials of the site.
Historic Environment	Site Selection Topic Paper (TOP02.1 to 02.4)	The entire site has been assessed through the site selection process which includes the site for 1,200 dws. It demonstrates the same conclusions apply for the site of 1,200 dws.

Consideration	Evidence	Justification
Transport	Evaluation of Transport Impacts (TRA06 to 06.3)	<p>Site capacity of 1,200 dws has been assessed within the Evaluation of Transport Impacts assessment consistent with the current proposal. The ETI assessed the cumulative impact of all growth proposed within the Part 2 plan. The County Council and the Vale agree this provides proportionate, up-to-date, relevant and adequate evidence for the Part 2 plan. Both parties recognise that further transport planning evidence will be required to support individual planning applications on the larger sites.</p> <p>The Council is preparing additional information and will advise on the timetable for this work separately.</p>
Air Quality	Note for Inspector re Cumulative Impact of Air Quality (HEAR04.5)	<p>Site capacity of 1,200 dws has been assessed as demonstrated within HEAR04.5 regarding cumulative impact from Local Plan 2031 Part 2 growth on Marcham AQMA. The assessment concludes the overall resulting air quality effect is 'not significant'.</p> <p>The Council is preparing additional information and will advise on the timetable for this work separately.</p>
Viability	Viability Update (INF02) Viability Statement (INF03)	<p>A larger site for 2,200 dws has been assessed through a Viability Update and Statement which covers the capacity of the current proposal for 1,200 dws. This assessment demonstrates the cumulative impact of the proposed site and the plan's policy requirements do not put the implementation of the plan at serious risk. The Council produced a Note for the Inspector regarding Viability (HEAR08.1) demonstrating the site for 1,200 dws can bear the level of contributions required to deliver the known infrastructure costs.</p>
Infrastructure	Infrastructure Delivery Plan (CSD10)	<p>The Infrastructure Delivery Plan (IDP) to support the Submission Version of the Part 2 plan identified known infrastructure costs and requirements for the site of 1,200 dws, which is consistent with the current proposal. The identification of these requirements has been undertaken through engagement with stakeholders and has identified the need for a primary school, leisure and sports facilities open space, community services and facilities on site, contributions towards secondary school and SEN provision and health care provision.</p>