

Matters arising from DIO Hearing Statement on RAF Halton

1. Overview

1.1. Crest Strategic Projects ('CSP', representor number 27869) has submitted representations that AVDC had not adequately justified the allocation of RAF Halton in its evidence. The DIO has, as a Hearing Statement to Matter 15.r (Session 21), now finally submitted technical evidence for the proposed RAF Halton allocation D-HAL003 (their representor number 29946). However, as this paper sets out, our concerns over the soundness of the allocation have still not been adequately addressed.

2. Green Belt: impact on openness

2.1. Given the stance of AVDC not to remove RAF Halton from the Green Belt, this matter is fundamental. NPPF para 89, 6th bullet, clearly states that on previously developed sites, if a site is to remain in the Green Belt then development must *'not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.'* An accurate appraisal of existing and proposed built form is thus required to demonstrate no greater impact on openness.

2.2. However we draw the Inspector's attention to the following matters arising from the new DIO submission:

- The PRP Vision Document (page 131) provides **no exact data** as all volume calculations are *'indicative subject to survey data of the existing buildings'* and *'estimations'*. The built form comparison is described as *'high level'*. It is thus impossible to carry out a robust openness assessment to demonstrate that 1,000 units will have no adverse impact on openness, as the NPPF requires. The JLL position statement notes that *'the site has capacity to accommodate the proposed allocation without a substantial negative impact on the AONB or the openness of the Green Belt.'* The required test is not one of whether a substantial negative impact is created, it is one of no greater impact.
- Page 3 of the JLL Position Statement states that development will be concentrated on already built-up areas, yet the PRP masterplan (p.125) shows residential blocks in what are currently **substantial, open grassed areas**. This is particularly true in the south-east of the site, which is the closest point to the AONB and the SAM (Long Barrow) and classified as *'Area 7.1: RAF Open Lands'* in the Vision Document. A key characteristic in its openness is a series of buildings set within landscape, providing a setting to the listed blocks to the north. Whilst the Vision Document on pages 129-131 details the existing footprint, volumes, conversions and new build figures and surmises a reduction in overall footprint and volume, the new build will not exclusively be on the footprint of existing buildings. As such an impact on openness can be expected (compare pages 37 and 126 of the Vision document, see our Appendix 1).
- The density of development at 35dph (which is referred to in the Vision Document as low density although it could be argued it is *medium density* in comparison within the local context e.g. Bryants Acre to the south-west and Trenchyard Avenue to the south of the site are only 24dph) has in effect dispersed this calculation of footprint across a larger site area. Clearly by spreading the calculated footprint in such a way the overall impact would be to significantly reduce openness and increase the visible volume of development.

- The table on p.131 of the Vision Document states the existing buildings have a footprint of 105,990m², yet no assessment of the type, height or style of these existing buildings is provided. As previously noted, the volume calculations are indicative and not based on survey evidence. Accurately assessing the impact on openness requires an appraisal of type and form and cannot purely rely on mathematical comparison.
- The Vision Document notes that there will be 792 new build homes on the site, with 208 provided through the conversion of 16 barrack blocks (138 units) and 6 other buildings (70 units). This is a fundamentally different position to that when RAF Halton was first included for allocation in the VALP. Paragraph 4.135 of the VALP Submission Version states that the first phase of development at RAF Halton would be the redevelopment / refurbishment of existing buildings, and the Housing topic paper (CD.TP.001) noted that *“An initial broad assessment established that there were 44 barrack blocks capable of conversion and a significant number of buildings on the site which could be demolished and replaced with housing.”*
- converting 22 buildings rather than 44 will have a very different impact on openness as a higher proportion of the 1,000 dwellings will be new build houses. It is not just the footprint of these new houses that impacts openness, but associated residential paraphernalia including driveways, garages, fences etc., **none** of which has been assessed.

3. Ecology (Peter Brett Associates RAF Halton Ecology Technical Appraisal June 2018)

3.1. The following concerns are highlighted over the PBA ecological appraisal:

- The report was based on a **single day visit** covering 82ha of the proposed allocation and an unspecified area of adjacent land. This is insufficient to gain a sufficient understanding of the site even for allocation purposes. In general the report lacks detailed information on impacts and mitigation, and is unacceptably superficial, leaving critical issues to the SPD stage, affecting deliverability.
- Natural England has advised (quoted in para 3.2.19 of the report) that mitigation measures are needed for off-site SSSIs. There is no evidence to show that this is **achievable**, such as landowner agreement or any mitigation measures that have been considered by NE and found to be suitable.
- Potential impacts were identified on several locally designated sites but **no mitigation** has been proposed to remove impacts (para 3.2.50). The report instead simply refers to Local Plan policy to assert that the locally designated sites would be protected.
- **No species surveys** have been carried out, although the report presents information that there are, or likely to be, several rare and/or protected species such as great crested newts, bats including Bechstein’s bat (one of the rarest bats in the UK), dormice, reptiles ‘over large areas’, roman snail, and badger.
- No biodiversity offsetting calculations have been provided which appears to be in conflict with VALP draft policies NE1 and NE2. There is no information to show that the development can meet the demands of AVDC regarding the calculations. The high value of many of the existing habitats means that there may be little scope for increases in biodiversity values for those habitats that are retained.

3.2. All of the above mean that it remains unclear whether the scale of the development is achievable.

4. Heritage (JLL Heritage Appraisal)

4.1. The heritage appraisal incorrectly states at paragraph 1.2 that the allocation of RAF Halton (first put forward in September 2017) has been informed by JLL's Heritage Appraisal (written in June 2018). This statement is indicative of the 'retro fitting' exercise that is taking place with regards to evidence to justify the allocation.

4.2. Additional areas of concern are:

- Paragraph 1.4 notes that a Statement of Significance for the heritage assets on site will be required to ensure significance can be identified and preserved / enhanced. A fundamental flaw is that this piece of work should be carried out before any masterplanning takes place to inform site layout, densities, setting etc. Yet the PRP Vision Document provides a masterplan site layout prior to assessing the significance of the wide number of heritage assets on the site.
- The JLL Heritage Appraisal is a factual document, reproducing list entries (22 of the 34 pages) and descriptions of the heritage assets (7 of the remaining 12 pages). There are eight paragraphs of text in the introduction and summary, yet there is **no interpretation and no impact assessment**. Paragraph 4.2 of the JLL Heritage Appraisal states that all of the initial studies relating to the conversion of listed buildings within the site are '*high level*' and '*varying degrees of alteration and intervention will be required*' that will be '*subject to a viability assessment at a later stage*'. Effectively the document has provided no further information on the possibility, viability or deliverability of the use of heritage assets within the site;
- Chapter 7 of the PRP Vision Document provides some concept layouts of how some of the listed buildings could be converted, although there is a high degree of uncertainty, as demonstrated in the text relating to Buildings 6-21 (page 138) which says '*existing levels externally will place some limitations on the accessibility of the buildings. The two options indicate varying levels of intervention in regard to the interior of the building. The appropriateness of this will be subject to discussions with the conservation officer.*'
- As noted in paragraph 3.6 of this statement, the conversions will total a maximum of 208 units (and all are referenced as being subject to viability, so this may result in a more limited number) from 22 buildings. This is **half** the amount anticipated (44 barrack blocks for conversion) when the site was originally allocated in the VALP, creating a very different impression and environment from a heritage perspective with over 700 new houses to be integrated into the landscape and setting of numerous listed buildings and other heritage assets;
- There is no assessment of the potential impact of the primary school, local centre and medium / high density residential development (45 dph / 50dph) being located directly adjacent to the Grade II listed registered park and garden of Halton House, itself a Grade II* listed building. All of this development will be new build which will have a significantly different impact than the existing buildings in these locations.

5. Landscape (PRP Vision Document, mainly Chapter 5 Baseline Landscape Analysis)

5.1. The landscape appraisal and information within the Vision Document continues the theme of inaccuracies within the submitted information:

- On page 31 of the Vision Document not all the groups of trees within the Site are shown. In particular, the central avenue of trees extends further than that shown in the figure. On page 33 it states that the site is “*partially located in the green belt*”, however the site is fully within the Green Belt;
- The information provided in section 5 of the Vision document provides a *baseline* study only for a Landscape and Visual Impact Assessment. It does not provide the assessment itself, nor is an ZTV included which would be normal for such a sensitive site. Consequently, it is not possible to determine how the ‘Vision for Development’ is responding and addressing impacts, for instance on AONB and local designations;
- Within the description of Landscape Character Area 7.2 (RAF Halton Sergeants Mess and Surrounds) it states that “*It is not covered by relevant designations,..*”. However, from a review of Figures on pages 16 and 33, it can be seen that LCA lies partially within the Area of Attractive Landscape;
- Key views are identified within the Visual Baseline, but there is no assessment of their relevant value nor on the potential impact of a development. It is not clear how a review of these ‘key views’, some of which look away from the Allocated Site (View 21), have “*influenced the layout*” as stated in para 2 of P124 in relation to the ‘Masterplan for RAF Halton’. *Sensitive views*’ are indicated in the Summary of Site Constraints on p.38, but there is no further clarification as to how these were derived from the Key Views;
- The extent of new built development within the Allocated Site as shown on the Proposed Concept Masterplan will have an effect on the setting of the AONB as the site is located on the lower slopes of the escarpment. Policy NE4 of the Vale of Aylesbury Local Plan (Proposed Submission) relating to ‘The Chilterns AONB and setting’ requires major development to be informed by landscape and visual impact assessment. This Vision document provides no assessment of the effects on landscape and views within the AONB and on the setting of the AONB. Consequently, there can be no assurance that the proposals can be delivered without causing significant harm to the AONB. The proposals within the Concept Masterplan show a primary road and built development extending close to the AONB boundary with creation of buffer area of undefined width lying beyond the Allocation Site. This is a very sensitive boundary and it is important to understand how the development will change in comparison to the existing situation (setting and views) and if the buffer is sufficient in width and treatment to be effective.

6. Highways (PRP Vision Document & PBA RAF Halton Transport & Movement June 2018)

6.1. Key concerns arising include the following:

- The PBA highways document (Appendix 5 to the PBA submission) refers to and makes play of the Oxford-Cambridge Expressway, yet RAF Halton is located in a **considerably worse** position than other sites, including the omitted Shenley Park, to benefit from and/or link or connect with the arc and expressway. The map on page 17 shows that RAF Halton is not within the corridor, since all of the route options lie to the **north** of Aylesbury.

- Page 6 of the PBA report states that various surveys have been commissioned to assess current levels of parking, traffic counts and queue lengths around the local road network. The results of these will be required to assess whether an additional 1,000 units can be accommodated at RAF Halton with no severe adverse impact on the road network, and needs to have been carried out to inform the allocation and concept masterplan, not afterwards.
- The statement on page 10 of the Vision Document that the RAF Halton site is '*within easy reach of Oxford and Milton Keynes*' is unsubstantiated and unquantified. Indeed, the site lies at virtually the **remotest** point from Milton Keynes and Oxford, within the Aylesbury Vale area.

7. Other matters

7.1. Other important concerns arising from the DIO submission include:

- **Employment:** RAF Halton currently employs around 2,000 people providing both military (exact number unknown) and civilian jobs (395 detailed in PBA Transport report) for the local economy. The DIO, JLL or AVDC have still not addressed the loss of employment land or jobs anywhere in the submitted information or draft policies, for what is a missed opportunity to retain an element of employment use on the site. Indeed, some of the heritage assets may lend themselves more to conversion for commercial uses than residential yet this has been totally overlooked. The VALP would erase this employment land from the district with no apparent justification or impact assessment.
- **Availability:** The position of the MOD remains the same - there is a stated intention to close the facility by 2022 as noted in the DIO letter dated 26 June 2018. This also states that the necessary evidence to support the phasing and deliverability to deliver 1,000 homes within the plan period has only just been tasked to the DIO estates team. The Site Delivery Statement (SDS) with AVDC programmes 100-125 homes per year from 2025, yet 208 of the units are subject to viability (conversion of listed buildings) so the robustness of this programming is highly questionable. The SDS also states that the wider RAF Halton site may have the potential for additional units through the Local Plan Review. It is illogical that a concept masterplan has been prepared trying to fit around the Green Belt constraint (albeit poorly) when clearly the intention is to develop a more comprehensive site at a later date in the future. This reinforces the prematurity of the allocation.
- **Sustainability Appraisal (SA:)** None of the additional information provided to support the allocation has been subject to sustainability appraisal or assessment against reasonable alternatives. Various assumptions made in the SA Technical Appendix by AVDC over RAF Halton are likely to require review in light of this additional evidence. As such, RAF Halton should be comprehensively re-appraised as part of a Local Plan Review, and not allocated in the current VALP.

7.2. None of the evidence submitted by DIO to support the allocation has been subject to public consultation, Sustainability Appraisal or assessment against reasonable alternatives. The site has therefore been given preferential treatment compared with other allocated sites and omission sites, undermining the credibility of the evidence base as a whole.

Appendix 1: Excerpt from DIO vision document

Representation for DIO (ID 29946), Appendix 3 (RAF Halton Vision Document)

“Building morphology within the site and its immediate context”, p.37

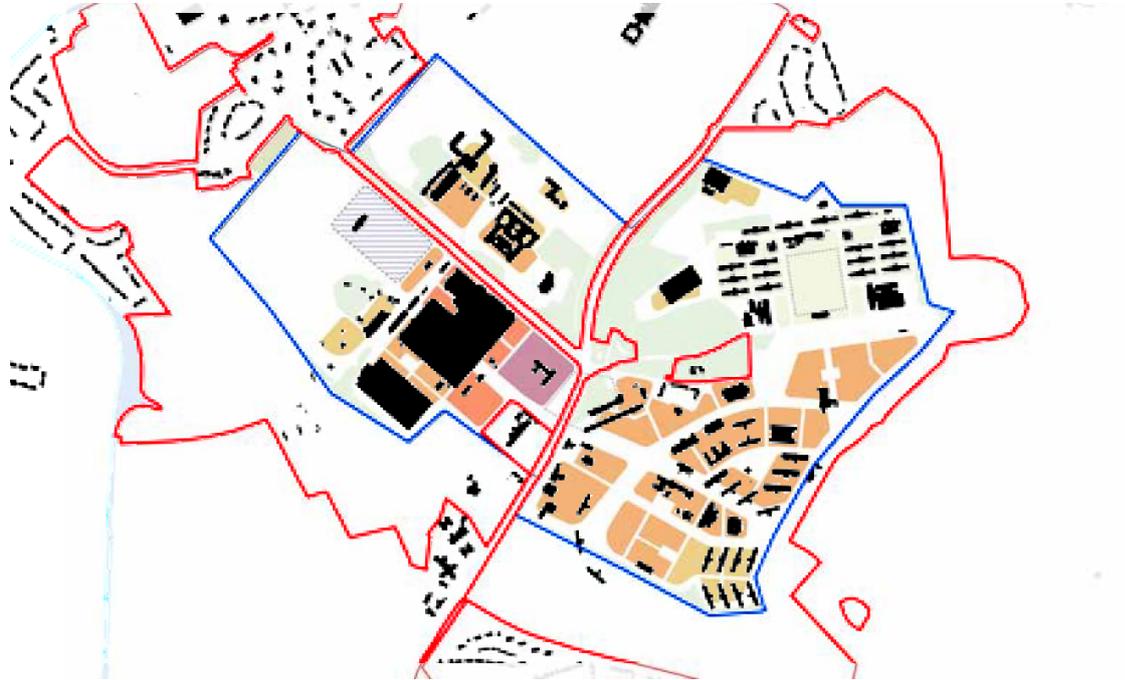


“Proposed residential blocks and densities” (p.126)



Overlay of the two plans

(Savills for Crest Nicholson)



- Site ownership
- AVDC housing allocation site
- Very low density residential (20dph)
- Low density residential (35dph)
- Medium density residential (45dph)
- Local centre (50dph)

- Site ownership
- AVDC housing allocation site
- Building