

Vale of White Horse Local Plan Part 2 EIP

Matter 1

On behalf of Webbpaton

12 June 2018

Introduction

McLoughlin Planning is instructed by Webbpaton to make submissions on the Inspector's List of Matters and Questions for the Vale of White Horse Local Plan Part 2 Examination in respect of Matter 1, Question 1.8.

Webbpaton's interests relates to its land at Longcot. A site location plan is appended to this submission.

Matter 1: Duty to Co-operate and other legal requirements

Question 1.8:

'Have the likely environmental, social and economic effects of the LPP2 been adequately addressed in the Sustainability Appraisal? Does the appraisal test the plan against reasonable alternatives for the spatial strategy of the plan and the distribution of housing?'

Response:

With regards to whether the likely environmental, social and economic effects of the LPP2 have been adequately addressed in the Sustainability Appraisal (SA), it is Webbpaton's view that they have not. In particular, concerns are raised in respect of the social and economic effects due to the flawed approach to assessing reasonable alternatives which does not consider sites below a threshold of 50 units.

It has to be recognised that LPP1 includes as one of its three central strands in its spatial strategy the need to promote thriving villages and rural communities, as set out in Figure 4.1 of LPP1. This is also a key aspect of the Framework, which states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. The Framework also recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby.

The SA and Site Section Topic Paper set a threshold of 50 units for a housing allocation in Part 2. Webbpaton previously raised concerns that there was no evidence to support this limit. In response to this, Officers responded that the Council's justification for applying a threshold of 50 dwellings is set out in Site Selection Topic Paper 2. The Topic Paper states:

'The Council recognises that smaller sites can contribute significantly to supporting housing delivery as they can deliver quickly and thus help to maintain a five-year supply of housing land. The threshold of sites having capacity to accommodate 50 plus dwellings, both alone or in combination with adjacent sites has enabled a range of sites to be assessed and expands on the number of sites considered through the Part 1 plan process. The Council considers that Neighbourhood Plans provide an appropriate approach for planning for sites less than 50 dwellings.'

Other than stating that Neighbourhood Plans provides an appropriate approach for planning for sites less than 50 dwellings, there is no evidence to justify or support a threshold of 50 dwellings.

Turning to the question as to whether the appraisal tests the plan against reasonable alternatives for the spatial strategy of the plan and the distribution of housing,

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Webbpaton maintains its concerns that the approach adopted for allocations in LPP2 is unsound.

The SA sets out the pre-conditions to assessing small sites, in so doing; Dalton Barracks is seen as a constant across 'all reasonable alternatives'. As will be expressed further in this statement, the SA should have considered the implications of not having Dalton Barracks in the plan given the clear concerns that have been raised over its future delivery.

The SA also fails in its approach to assessing locations for smaller sites in that East of Kingston Bagpuize and Southmoor were seen as the first 'port of call' (paragraph 6.5.6) for allocations, which were treated as a constant. These allocations, combined with the Dalton Barracks allocation start to seriously limit the level of development available to be allocated elsewhere. This use of 'constants' across the SA undermines the process as it fails to justify why these should be maintained in the first instance.

A further concern is the decision making process by which the SA determines whether the plan allocates larger sites (Option 1), three small sites (Option 2) or six smaller sites (Option 3), set out in Section 7 of the SA. That approach was flawed in that Option 3 was handicapped by the relative weaknesses of individual sites, which made up the option against the assessment criteria.

Webbpaton also considers the approach of providing housing at a handful of locations in this part of the district is clearly contrary to the 'key strand' set out in Figure 4.1 of LPP1, which provides for housing in rural areas. This undermines the ability of other villages not identified for additional housing within the plan to accommodate modest levels of growth to support the vitality of settlements in accordance with the Framework. This is further compounded by the fact that LPP2 fails to allocate any further housing within the Western Vale Sub-Area. The approach is therefore considered to be unsound.

Notwithstanding this, Webbpaton notes that at the Larger Villages within the Abingdon-on-Thames and Oxford Fringe Sub-Area, LPP1 already allocates 280 dwellings at Kingston Bagpuize with Southmoor and 510 dwellings at Radley. In addition to this, LPP2 now proposes a further 600 dwellings at Kingston Bagpuize with Southmoor, 130 dwellings at East Hanney (across 2 sites) and 90 dwellings at Marcham. In combination, these now represent significant allocations, which are akin to strategic sized allocations. This raises issues insofar as a significant amount of infrastructure will need to be delivered to support these large allocations. Moreover, the ability for these settlements to successfully 'absorb' such a large quantum of development in a relatively short timeframe will be reduced.

If Webbpaton's concerns regarding Dalton Barrack's ability to deliver housing in an appropriate timescale become apparent, additional allocations will be required. In this scenario, given the housing strategy set out in LPP1, the only option would be to direct this balance to the Larger Villages given that there are no other potential sites which could yield in excess of 200 houses. This would increase the pressure on these settlements, particularly where large allocations are already proposed. Furthermore, it is noted that Green Belt and Area of Outstanding Natural Beauty designations present significant constraints to further development at Radley, Kennington and East Hanney.

A modest allocation at Longcot would relieve some of the pressures on the other villages within the Abingdon-on-Thames and Oxford Fringe Sub-Area and the South East Vale Sub-Area. It would also allow Longcot to accommodate a modest level of growth to support its vitality in accordance with the Framework.

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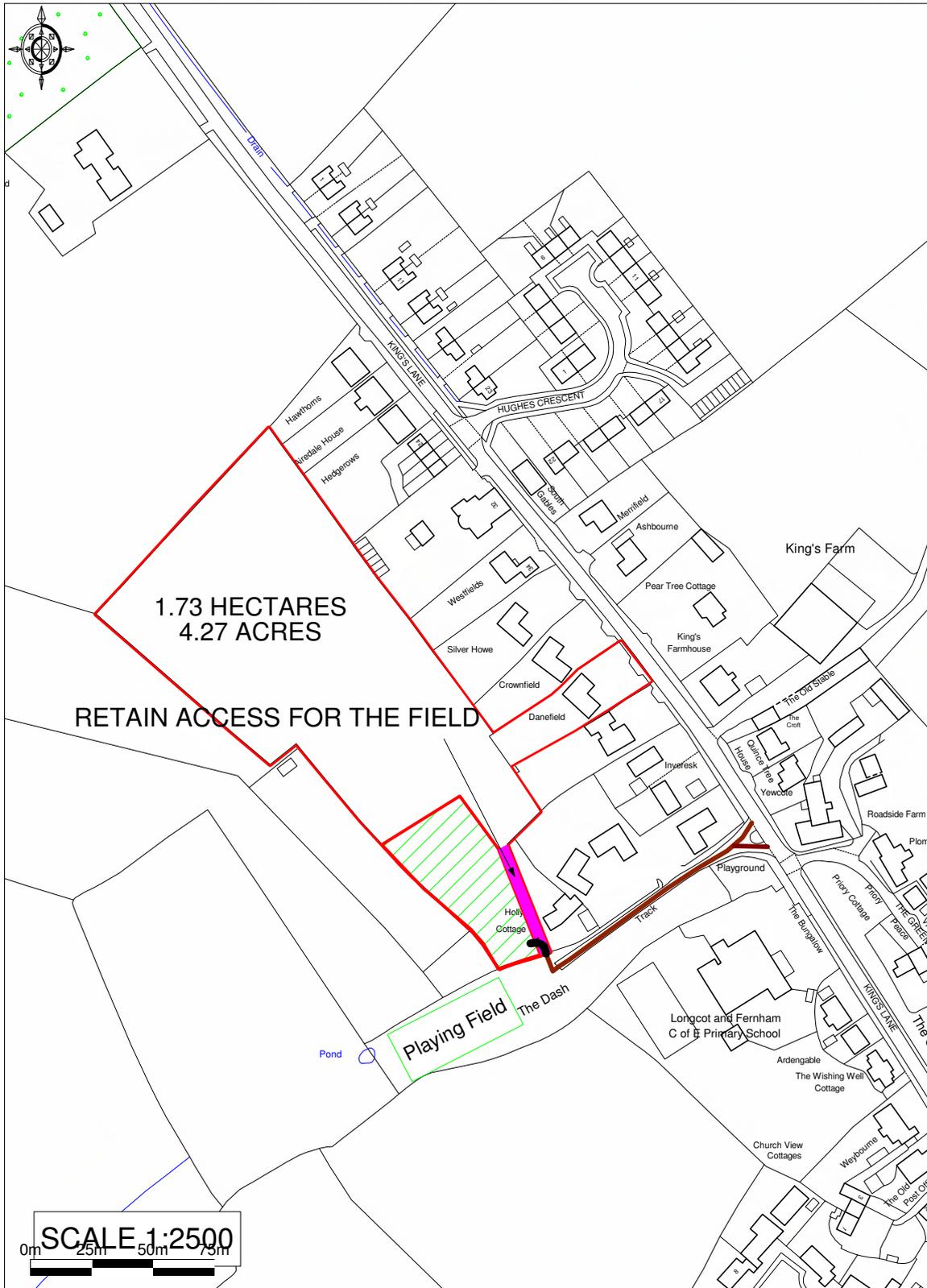
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In summary, Webbpaton considers that the decision not to consider sites of less than 50 units in LPP2 would fail to promote *'thriving villages and rural communities'* which is one of the three central strands of spatial strategy set out in LPP1. Consequently, the likely environmental, social and economic effects of the LPP2 have not been adequately addressed in the SA. Furthermore, the lack of a clear small sites approach shows that the plan has deliberately overlooked realistic development opportunities at a non-strategic level, below 50 units. This means that the plan and the SA have failed to consider the 'reasonable alternative' of a more dispersed development strategy.

LONGCOT2 IDENTIFICATION OF CHANGE OF USE AREA



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Getmapping plc 2011. Plotted Scale - 1:2500

CHANGE OF USE OUTLINED AND CROSS HATCHED GREEN