

# Vale of White Horse Local Plan Part 2 EIP

## Matter 1

On behalf of Webbpaton - Steventon

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### 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 south of Haney Road, Steventon. 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 Part 1. 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 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.

Further to the matter of 'small sites', Webbpaton notes the Officer's response in respect of various Regulation 19 consultation comments submitted in respect of alternative sites within the Abingdon-on-Thames and Oxford Fringe Sub-Area. The Council states that:

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*'It is important the plan makes provision for a range of sites of different size, type and geography to assist in providing appropriate choice, meeting different housing needs, and giving consideration to housing delivery. The provision of smaller site allocations within the plan is also important and necessary to ensure housing is delivered throughout the plan period.'*

In light of the comments above, it is difficult to see how applying threshold of 50 units for small sites can fully achieve this.

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, 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.

Webbpaton also have concerns regarding the site selection process, which underpinned the proposed allocations within LPP2. With regard to the treatment of Webbpaton's land interest, land south of Hanney Road in Steventon (STEV02) was 'sifted out' of the site selection process at an early stage, as it is partially located within Flood Zone 2 as defined on the Environment Agency's flood maps.

Whilst additional compelling evidence was submitted to demonstrate that the flooding constraints could be overcome, the Council stated, *'no evidence was submitted which sufficiently demonstrated that flooding issues could be overcome'*. Webbpaton considered that this conclusion was not sufficiently substantiated and the site was effectively dismissed without proper assessment. It is considered that the site should have progressed to at least Stage 3 in the site selection process and featured within the options for the plan.

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.

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

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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.