

# Vale of White Horse Local Plan Part 2 Examination

## ***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?*



*The Fyfield Elm*

Submission by

**Fyfield and Tubney Parish Council**  
and the Fyfield Land Action Group (FLAG)

In Support of Representation ID: **730255** (Dr Stephen Fraser)

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*Fyfield and Tubney Parish Council wish to be represented at the Public Examination by:*

**Mark Baker (ID1095180)**

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### **Unsound, selective and biased evidence base for site KBAG\_A**

This submission is intended to be read in conjunction with Section 2.1 and Appendices A and B of our comprehensive representation to the Publication version of LPP2, and refers to LPP2 Topic Paper2: Site Selection Appendix B (principally pages 45- 47) and the Landscape Capacity Study (Submission Library ref: REF014NAT07). The text below replicates Section 2 of our submission 2 under Matter 4 Question 4.1 (c) in order to give the Inspector the option of considering it in detail under either heading.

Section 2.1 and Appendix A of our representation drew attention to a large number of omissions and misrepresentations about Site KBAG\_A, Fyfield land east of Kingston Bagpuize, in Topic Paper 2: Site Selection Appendix B and in the Landscape Capacity Study, which suggest that the DC planning officers and their consultants have set out to justify the site as a preferred candidate rather than to evaluate it dispassionately. (Dandara Ltd has independently cited the Fyfield site as an example of a site being unfairly favoured for development).

A more objective assessment of the cumulative significant planning and environmental adverse effects of this proposed development should have led the District Council to reject it as a housing allocation. This cumulative effect would result from the following combination of adverse impacts (red and orange) – transport; landscape; flooding; ecology; historic environment; access; water and waste-water; public services and environmental health / air and noise pollution.

Comments made in the earlier consultation on LPP2 were apparently ignored; and in its summary of representations the DC wholly failed to refute – or even address – the numerous criticisms made by Fyfield & Tubney Parish Council and its residents. Instead they relied on a claim to have followed due process in accordance with national guidance.

It is not the process but its misapplication that is of concern. Substantive comments have not been properly addressed. The testing of the plan against reasonable alternatives is flawed and we request the Inspector to conclude that the site selection process is invalidated by the lack of balance and impartiality in the evidence base.

**MAWB 5.6.18**