



### Introduction

1. McLoughlin Planning is instructed by Rosconn Strategic Land (RSL) 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.
2. RSL's interests relates to its land to the west of the Parish Church of St Peter, Wootton. A site location plan and an illustrative masterplan are appended to this submission.

### Question 1.8:

3. *'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:

4. With regards to whether the likely environmental, social and economic effects of the LPP2 have been adequately addressed in the Sustainability Appraisal (SA) (CSD09), it is RSL'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.
5. It has to be recognised that LPP1 (ALP02) 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 at paragraph 28 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.
6. The SA at paragraph 6.4.1 and the Site Selection Topic Paper (TOP02) at Table 3.1 on page 10 set a threshold of 50 units for a housing allocation in Part 2. RSL 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:

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On behalf of Rosconn Strategic Land

12 June 2018

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7. *'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.'*
  8. 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. However, on a more fundamental level, the fact those sites of less than 50 units can only be dealt with through Neighbourhood Plan raises serious concerns in itself. A large area of the Abingdon-on-Thames and Oxford Fringe Sub Area is designated as Green Belt and therefore it will not be possible to re-draw Green Belt boundaries through Neighbourhood Plans. This effectively places an embargo on any new residential development in the Green Belt within this sub-area, other than sites allocated through LLPP1 and LPP2. This will seriously impede the ability of affected settlements to maintain and enhance their vitality and fails to assist in meeting the Key Strand of LPP1. It is not clear in the SA how the impact of the threshold and the status of Neighbourhood Plans, vis-à-vis green belt review have been assessed.
  9. This lack of future development potential would be acutely felt at Wootton and has marked social and economic impacts. Census data shows that household growth in Wootton has been extremely modest which has lead to an ageing population between 2001 and 2011. This ageing population can also be linked to a lack of available housing, given the decline in the younger part of the working population and a corresponding increase in the age of the older population.
  10. Additional development in the village would allow for the continued support of the services in the village by placing a demand on them for meeting the day-to-day needs of residents. Furthermore, development would provide both open and affordable housing in line with the plan's requirement for 35% affordable housing. Again, an analysis of ONS Census data on the number of affordable housing in 2001 and 2011 show that in 2001 the figure was 183 in 2001 and in 2011 the figure was 207, which shows a modest increase albeit this could be down to a

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change in the census areas between 2001 and 2011. This increase is considered insufficient, given that the plan considers the Abingdon/Oxford Fringe sub-area as having the highest need for affordable housing in the District.

11. Should additional housing not be provided in the village, there is the concern that the retired population of the village will increase and the lack of housing, both open market and affordable will be exacerbated, potentially, reducing the demand for school places in the longer term. In addition, a lack of development in the village will mean that the level of economic activity in the village will remain static, in terms of supporting local shops, public houses, bus services and other community facilities. There are very limited delivery mechanisms for housing in the village, so the above problems will remain unresolved, if the Plan's chosen spatial strategy is followed.
12. Further to the matter of 'small sites', RSL 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 (CSD02.1) (pages 197-198). The Council states that:
13. *'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.'*
14. In light of the comments above, it is difficult to see how applying a threshold of 50 units for small sites can fully achieve this.
15. 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, RSL maintain their concerns that the approach adopted to allocations in Part 2 is unsound.
16. 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'. RSL is of the view that 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.

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17. 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.
  18. In terms of the treatment of the RSL land at Wootton, the Site Selection Topic Paper (TOP02.1) shows that the site passed the first three stages of the selection process and was then grouped into a collection of sites known as WOOT\_C to be subject to further testing. The WOOT\_C site was discounted as a location because of the impact on the Green Belt. However, further analysis was made of the RSL site in isolation. It was found that the development of this site would not have a significant impact on the Green Belt. It was only dismissed from the process because it was below the 50 dwelling threshold set out in the selection methodology. It also has to be recognised that as part of the Local Plan Part 1 process the RSL site was to be removed from the Green Belt. In assisting in meeting the outstanding housing requirement, the SA appears to have overlooked the sites previously considered by the Council as being suitable for development.
  19. 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.
  20. In summary, RSL 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 a 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 Sustainability Appraisal. 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.

# Land East of Wootton










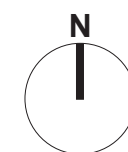




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-  Site Boundary - 2.04Ha
-  Proposed Housing (up to 40 dwellings)
-  Retained Existing Trees/Hedgerows
-  Proposed Attenuation
-  Proposed Tree Planting
-  Public Open Space
-  Potential Footpath Link To Existing Public Right Of Way
-  Proposed Main Access Point



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Rosconn Group  
Land At Wootton  
West Oxfordshire

**ILLUSTRATIVE MASTERPLAN**

**DRAFT**

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19 February 2016 CMW / CPR  
**7125-L-03 rev A**

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