

# Vale of White Horse Local Plan Part 2 Examination

Written statement in support of original objection by

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## Matter 1

### 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?'*

To address the second question first, the answer is patently '**no**'. One site – 'Land East of Kingston Bagpuize' (KBAG-A) – was a constant for both the interim (March 2017) and final Sustainability Appraisals. Even the largest, and most sustainable, potential site (Dalton Barracks) was tested with variable assumptions of housing supply for the interim appraisal.

The reasons for KBAG-A being a constant throughout the SA are obscure. The SA<sup>1</sup> contains the statement [that there was] 'no new evidence (from ... consultation... engagement) that serves to justify the site being ruled out'. At best this is misleading because – as even the VoWH DC acknowledges – a very large number of cogent and well-founded objections were received following the consultation stage of the LPP2. It is also stated that the site is being actively promoted as a reason for not ruling out the site. The active promotion of a site is **not** relevant to its **sustainability**.

All the options tested in the final SA show a surplus of at least eight percent<sup>2</sup> (1817 dwellings) above the target housing figure. Given this potential surplus, a **fair** test of reasonable alternatives would have tested combinations of sites not including KBAG-A, and possibly including smaller sites and/or a more sustainable site west of Wantage.

### ***The Sustainability Appraisal does not test the plan against reasonable objectives.***

To address the first question, the likely social and environmental effects of LPP2 have not been adequately addressed by the SA. It is flawed because:

- It does not address the sociological and possible mental health consequences that living on large isolated settlements (such as the KBAG-A site) would have on children and adolescents, who would be much better served by the facilities offered by a Market Town. This could, and should, have been considered as part of Sustainability Objective 4, 'Health'.
- Whilst it acknowledges the undisputed benefits to health of walking and cycling, the SA suggests that if the opportunities for these are limited/non-existent they are compensated for by good public transport<sup>3</sup>. The logic of this escapes me.

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<sup>1</sup> Sustainability Appraisal, Appendix III, Table A, page 85

<sup>2</sup> Sustainability Appraisal, Appendix VI, p113.  $24536 \times 0.08 / 1.08 = 1817$

<sup>3</sup> Sustainability Appraisal, Sustainability Objectives 'Health' and 'Movement', pages 94 and 92 respectively

- Whilst paragraph 10.11.1 of the commentary on spatial strategy in the SA recognises that there will be air quality concerns associated with increased traffic due to some proposed developments, it dismisses the pollution caused in Marcham by traffic from any developments in Kingston Bagpuize and Southmoor (KBS) with the statement that ‘Kingston Bagpuize and Southmoor is also very well linked by public transport’. This is either deliberately misleading, simply biased or a statement of the ignorance of whoever was responsible for the SA: there is **no** effective public transport from KBS to Abingdon or Science Vale.
- The importance of Climate Change Mitigation is played down in the SA. It could, and should have been addressed quantitatively. It states that there is little to differentiate the options considered<sup>4</sup> because ‘climate change is a global rather than a local issue’. I disagree: ultimately local actions will be required.

Because a full set of ‘reasonable alternatives’ was not considered the SA does not recognise that locating developments where all journeys would necessarily be by car will contribute negatively to climate change. In my original representation I estimated this to be approximately an extra 460 kg/per annum/per capita. For a site with 700 houses where the residents are obliged to travel five miles by car for any need, however minimal, this amounts to a total of at least 1,100 tons of carbon dioxide per annum. Such a CO2 burden is not negligible. Similar straightforward calculations should have been part of the SA to put a comparison of the options on a quantitative footing. However, only qualitative statements are made and reasonable alternatives, e.g. excluding sites essentially reliant on cars, were **not properly considered**.

- Although one site (KBAG-A) lies wholly within the parish of Fyfield and Tubney, the SA, which runs to 121 pages, mentions **Fyfield only twice**<sup>5</sup> and **Tubney not at all**. The SA gives no consideration whatsoever to the social and environmental impact of the proposed development (and other developments in LPP2) on the residents of Fyfield and Tubney. More generally, the SA does not consider the cumulative effects of approved (LPP1) and LPP2 developments on any existing receptors.

***The likely environmental and social effects of the LPP2 have not been adequately addressed in the Sustainability Appraisal.***

Whilst I have made some reference to a specific site in the above, I believe that the issues with the SA are of a sufficiently high level that they reflect on the overall soundness of the plan. However, if the inspector prefers they could be considered as part of the site-specific question Matter 4.1(c).

JHC

10 June 2018

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<sup>4</sup> Sustainability Appraisal, Sustainability Objective ‘Climate change mitigation’, page 119

<sup>5</sup> In the context of a putative garden village which was excluded from consideration at an early stage.