



Rockspring Barwood East Hanney Ltd

Hearing Statements for Vale of White Horse Local
Plan 2031 Part 2: Detailed Policies and Additional
Sites
Matter 4

Prepared by WYG Environment Planning Transport
Limited



Preamble

WYG are instructed by Rockspring Barwood East Hanney Ltd ('our client' hereafter) to provide planning consultancy advice in respect of their land interests at land South of Steventon Road, East Hanney, which lies within the boundary of the Vale of White Horse District Council.

Detailed comments have been made at all stages of the Vale of White Horse Local Plan Parts 1 Part 2.

WYG have been representing the client since January 2016 and appeared at the Stage 2 Hearings for the emerging Local Plan on Matters relating to Housing Land Supply and the Spatial Strategy. Prior to WYG's involvement, representations were submitted on behalf of the client by Oxalis Planning.

Representations were made to the Council's Call for Sites consultation in July 2016 and these were supplemented in October 2016, in respect of the Local Plan Part 2. Most recently, submissions were made to the Preferred Options consultation in May 2017 and to the submission Version of the Part 2 Local Plan in November 2017.

Our client's site lies adjacent to the settlement of East Hanney, on its eastern edge (identified in Appendix 1 of Appendix 1). East Hanney is a 'Larger Village' as identified in the Local Plan Part 1, providing a number of services and facilities which meet the day to day needs of the area.

An outline planning application for the development of our client's land interests at East Hanney was refused on 25th November 2015 by VoWH District Council, contrary to the Planning Officer's positive recommendation for approval. The grounds of refusal related to matters of heritage and landscape impact and the absence of a Section 106 Agreement at the point of determination.

A planning appeal was submitted against the Council's decision to refuse planning permission on 26th February 2016 and was heard via the Written Representations procedure (appeal ref: APP/V3120/W/16/3145359). On 7th July 2016 the Inspector issued his decision, dismissing the appeal. The sole ground for dismissal related to the scale of the proposed development, which was considered to be "*out of character with the existing form and layout of the village and disproportionate to its existing size*" (para 36, Inspector's report). It is of note that the refusal was predicated only on scale, and not in relation to the principle of development in this location per se, which was acknowledged to be appropriate in all other technical respects, including the absence of any harm to heritage assets.

The site is therefore now promoted for a development of 50-75 dwellings, commensurate with the wider housing distribution strategy established by the Vale of White Horse Local Plan Part



1. The merits, benefits and sustainability credentials of the site remain as identified in the May 2017 representations and are not repeated here.

This Hearing Statement seeks to reiterate and update where necessary, comments previously made in respect of the Submission Version Local Plan Part 2 and associated Sustainability Appraisal, to confirm our Client's position. The Statement is structured under the following broad themes, flowing from the Inspector's Matters and Questions:

Matters to which this Statement refers:

Matter 4 – specifically inspector's questions 4.1 a) to d) inclusive and 4.5



Matter 4: Abingdon and Oxford Fringe Sub Area

Inspector's Question 4.1: *"Other than Dalton Barracks (Matter 5), are the housing allocations listed in Policy 8a the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Are the estimates of the site capacity justified? Are the expected timescales for development realistic? Are the site development template requirements – both general and site specific – justified, consistent with national policy and would they be effective?"*

- a) *North of East Hanney*
- b) *North East of East Hanney*
- c) *East of Kingston Bagpuize with Southmoor (in Fyfield and Tubney Parish)*
- d) *South East of Marcham".*

Inspector's Question 4.5: *"Are the proposals to extend the area of safeguarded land for the Upper Thames Strategic Storage Reservoir justified? Would there be any adverse impacts?"*

With reference to the LPA's identification of site and establishment of reasonable alternatives for the Local Plan Part 2, Section 4.0 of the WYG May 2017 representations and Section 3 of the November 2017 representations set out a detailed site specific analysis of the Council's preferred allocations within the Abingdon on Thames and Oxford Fringe Sub-Area, and as set out in respect of Matter 2, and in Section 2.0 of the May 2017 WYG representations, the soundness of the Council's approach to site identification is already in question because of the flaws in the approach to meeting the requirements of the SEA regulations. However, there are also some 'soundness' critical issues which must be taken into account when assessing the Council's preferred allocations set out in the Local Plan Part 2. These are reiterated in respect of the 4 sites in the Abingdon on Thames and Oxford Fringe Sub Area below and should be read alongside the detailed representations made in the WYG May 2017 representations.



Inspector's Question 4.1 – a) North of East Hanney

No additional work has been undertaken by the Council to address the concerns raised regarding the soundness of this site, nor does the Statement of Common Ground (Doc Ref SCG13) address the matters raised. Indeed, the Statement of Common Ground identifies that the site is adjacent to a conservation area but makes no reference to any heritage assessment work which has been undertaken to support the site's allocation.

The proposed allocation is considered unsound as it is neither justified nor consistent with national policy. As set out within the WYG May 2017 representations at Section 4.2, the heritage impacts arising from the development of the site would invoke the statutory duties with regard to the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as Section 12 of the NPPF. This is not recognised in the Council's evidence base nor has the matter been attached 'great weight'.

As set out within the WYG May 2017 representations at Section 2, and in reference to this site at 4.1, the methodology used in identifying the sensitivity and capacity of the landscape areas employs a scoring system which is somewhat formulaic. The SA identifies the site as having 'medium/high' landscape capacity (page 107) but no consideration is given to the northern and eastern boundaries, which would require strengthening with new tree and hedgerow planting.

In addition, whilst the proposed allocation is in Flood Zone 1, low risk of flooding as identified on the Government Flood Risk Map the reasonable alternative, my client's land, is at a very low risk of flooding.

In the absence of appropriate landscape work or a consideration of the differences in flood risk, it is not possible to explore the basis on which the Council have found this site to be a site which best fulfils the Local Plan Strategy with reference to a proper assessment of the identified reasonable alternatives.



Inspector's Question 4.1 – b) North East of East Hanney

The proposed allocation is considered unsound as it is neither justified nor positively prepared.

No additional work has been undertaken by the Council to address the concerns raised regarding the soundness of this site, nor does the Statement of Common Ground (Doc Ref SCG4) address the matters previously raised. As set out within the WYG May 2017 representations at Section 2, and in reference to this site at Section 4.1, the methodology used in identifying the sensitivity and capacity of the landscape areas employs a scoring system which is somewhat formulaic. The SA (page 107) identifies the site as having 'high' landscape capacity but no consideration is given to the northern and eastern boundaries, which would require strengthening with new tree and hedgerow planting.

In addition, whilst the proposed allocation is in Flood Zone 1, low risk of flooding as identified on the Government Flood Risk Map the reasonable alternative, my client's land, is at a very low risk of flooding.

In the absence of appropriate landscape work or a consideration of the differences in flood risk, it is not possible to explore the basis on which the Council have found this site to be a site which best fulfils the Local Plan Strategy with reference to a proper assessment of the identified reasonable alternatives.