

24th March 2019

Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

Re Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications

EHPC Response to Local Plan 2031 Part 2 Consultation (March 2019)

Dear Sirs

This response is provided by East Hanney Parish Council on its behalf and on the behalf of the residents and community of East Hanney.

East Hanney is grateful for the opportunity to take part in this consultation. It gives the village an opportunity to consider and respond to several matters, including those mentioned at the Inspector's hearing, but for which residents were not in a position to be able to provide detailed evidenced response at the time.

Accordingly, The Parish Council asks that the Inspector consider the detail of this representation together with the evidence already provided. The Parish Council considers it imperative that further consideration be made of the inclusion of the identified sites in the parish of East Hanney, which are strongly objected to by the community. There is particular and strong objection to the inclusion of the site at Ashfields Lane which itself has issues affecting deliverability, the nature of the site and location also giving rise to it falling contrary to planning guidance in a number of areas.

The Council and residents have reviewed the draft Plan as amended and the commentary relevant to East Hanney. In the summary to this response, the Parish Council expresses the hope that the Inspector considers the detail of this response and reconsiders the need for either site in East Hanney and the scale and density of those sites.

Requested Amendments

We request the following amendments to the plan:

[REDACTED]

- 1) Please consider removal of the site at Ashfields Lane, NE of East Hanney SITE 7 ref. EHAN-C for the reasons given in this representation, below.
- 2) Should the site at Ashfields Lane, NE of East Hanney SITE 7 remain in the Local Plan, the extent of the allocation should be reduced to a deliverable number. The Parish Council maintain that the largest number of dwellings with a suitable density and which is sustainable for the small community of East Hanney would be no more than 45. This figure should be explicit in the Plan.
- 3) The Parish Council requests that AM15 be amended as set out below to correctly reflect the limited facilities available in East Hanney. It is of significant note that East Hanney is one of the very few villages and by far the smallest settlement targeted by the Vale of White Horse District Council as a strategic site for development under the Plan.

Reasons for the amendments requested

The Parish Council has continued concern about the inclusion of the sites at East Hanney and the impact that such development would have on our village. In particular, there are concerns regarding how or why East Hanney is considered to be able to support the additional housing or meet the needs of the those residents. The village is neither directly related to Oxford nor able to provide local services or have the infrastructure to meet the needs of those for whom the housing is intended. Any residents of East Hanney, current or future must travel to make use of basic services such as access to a shopping centre, and access to dental or health treatment.

Further the sites identified by the Vale do not accord with the requirements of the District Council's own policies and guidelines for qualification as strategic sites in that:

- a) The sites are subject to flooding and therefore cannot have met the sequential test requirements, there being other alternative sites dismissed by the Vale, which are not subject of flood. Risk of flood is frequent and is evidenced in the information previously provided. Therefore, in accordance with the NPPF should not be promoted for development, particularly in the context of the Local Plan when the District is understood to have an obligation to only include sites that fully meet with planning guidance, which is not the case here.
- b) East Hanney no longer meets the District Council's Vales own criteria for a larger village having lost services and therefore should not be considered as a base for allocation into the plan. The village only having services and infrastructure services for a small village and indeed shares many of those services with its neighbour, West Hanney. A village that was identified as being too small for strategic allocations. East Hanney believes that it is wrong for the Vale to present the village as having suitable services and facilities.
- c) The sites identified are below the size threshold and policy requirements to qualify as Strategic Sites.

The Parish Council is very concerned that despite provision of evidence, detailed representation and the long history of flood in the village that East Hanney remains in the draft for Local Plan Part 2. It does appreciate that this has been subject of the hearing but remains concerned, especially regarding the consequences of impact on the risk of flood to the neighbouring dwellings that are

affected, as well as on the impact on the village and lack of services to be able to support this number of additional homes.

Why does the Vale consider that this village is appropriate and suitable to support Oxford's unmet needs?

There are 8 key points that it would ask the inspector to reconsider regarding the inclusion of East Hanney in the plan, and particularly the site which is north of Ashfields Lane (site NE of East Hanney Site 7 ref EHAN-C).

- 1) East Hanney has already received developments in excess of 240 homes arising from planning applications. This represents a considerable growth above some 345 dwellings which existed in the settlement at the start of this process in 2011. Thus, East Hanney has already been committed to a growth in the village of nearly 70%. Should the strategic sites remain in the Plan then the village would be exposed to further growth with a cumulative impact of over 100% resultant in rapid and unsupported growth. This would be excessive and have adverse effect on the environment and character of the village. The village being of a historic and rural nature.
- 2) Transport issues. The purpose of this plan is to provide Housing to meet Oxford's unmet need. The Local Plan Part 1 was for the provision of homes for the Vale of White Horse to the period 2031. Under that Plan the neighbouring areas of Grove and Wantage were allocated a significant number of homes.

The A338, which runs through the village, is jammed during the main periods of commute resulting in travel times to Oxford being over an hour. It is not clear from the outputs of the Local Plan Part 2 hearing whether this has been taken into consideration in the decision by the Vale to continue to allocate sites at East Hanney.

It is not easy to travel into Oxford from East Hanney by car at peak flow hours, and these are the times of the day when the residents for whom these houses are allocated would need to travel in order to be in Oxford. As East Hanney is not conveniently located close to Oxford, this is a concern and an issue; there is already a highways congestion problem. There is no convenient public transport that does not use the same routes as private vehicles, there being no train station in East Hanney, despite a rail line running just south of its southern boundary with Grove. This has direct impact on whether East Hanney is suitable as a location for housing relevant to meeting Oxford's unmet need.

- 3) It is understood that the Vale Planners consider East Hanney to be within the Abingdon hierarchy as part of their spatial strategy. Yet geographically East Hanney is divorced from this spatial area and instead looks to the local commercial centre of Wantage. The address of the village is East Hanney, Wantage. The postcode for East Hanney is OX12, shared with Wantage rather than OX14, which is the Abingdon postcode and that of its immediate hinterland. The Council notes that Wantage is considered by the Vale to be in a different spatial area relevant to planning and the Local Plan.

For residents there is no spatial relationship or reason why East Hanney should be considered in this context, the villages relationship being with Wantage, both in terms of distance, services, and spatial relationships. Thus, whilst in the inspector's letter it is acknowledged that there is logic in allocating housing for Oxford's unmet need to the area immediate to Oxford, which is Abingdon, it is not the case that East Hanney fulfils this criterion. East Hanney for example, being over an hour bus ride and 2 journeys from the John Radcliffe hospital, one of the main employers and regional health provider which residents would need to be able to travel to with ease.

Further, the Vale are clear in the Design Guide that a core principle of their planning and strategy is to meet local needs. In this context they give the examples of use of desire lines. The allocation of sites at East Hanney to meet the needs of the population of Oxford is not consistent with this principle, as East Hanney is neither close to Oxford, nor does it have services locally to support the needs of this additional population.

With regards to location and travel times relevant to potential alternative sites and the Vale's own planning policy criteria. As mentioned, East Hanney is not conveniently located to Oxford as it is a rural location, nor is there ease of travel to and from Oxford city centre because of the congestion on the A338 at peak flow, compared to other locations where there are direct links. For example, when viewed in comparison with the market town of Faringdon, which is just 17 miles from Oxford city centre and has the benefit of the A420 being a dual carriageway for much of its length, offering a faster road link. Other towns and villages offer rail access. In this context it is not understood how East Hanney is considered appropriate for access to Oxford compared to other villages and towns that are on main arterial routes with direct rail or dual carriageway access.

- 4) Sequential Test. It was clear from representations made during the first phase of consultation that there are other sites in locations with services able to support community needs, and with direct lines of access to Oxford. Such sites being developable in other locations outside of East Hanney, free from flood risk, and readily available for allocation. We do not understand why these were not brought forward by the Vale and why the Vale has insisted on promoting sites in East Hanney. We ask that the inspector review the sequential test undertaken as it does not appear logical for sites at East Hanney which have issues such as flooding, and without the travel issues that the A338 presents, to have been allocated. We feel that this is an area of the plan currently open to challenge.
- 5) Number of homes allocated. Focusing on the Ashfields Lane site. The Vale has allocated 80 houses for this site. They have done so with the knowledge that this site cannot deliver this number of houses, there are a number of reasons that were discussed with them by East Hanney Parish Council prior to the draft plan being published. Those include:
 - a) The site is an edge of village location and therefore under the Vale's own policies needs to reflect a green edge to the village and thus any development would be at a lower density than within the village. As the density of homes in East Hanney is approximately 16per ha, the number of homes should have reflected this. The Vale's planners have instead applied a maximum number of homes based on urban density. This is not deliverable as the site is

in a rural village location and it would have serious adverse impact on the character of the village.

- b) As discussed at the Inspection the site is subject to flood and as evidenced a large area within the site is regularly underwater. As consequence part of the land would need to be provided for as drainage and ponding. This seriously affects the layout and capacity of the site.
- c) The site will also need provision for protection from road noise and vibration. One side of the site also abuts the village's conservation area for which provision would also need to be made.
- d) The organisation seeking to develop the Ashfields Lane site and who have made the approach to the Vale leading to the inclusion of the site in the Vales thinking, is Pye Homes. The inspector needs to be aware that Pye Homes had entered consultation with the village and produced a site plan of the possible development. In that consultation Pye identified that the site could only provide a lower number of homes at maximum [thought to be 55 homes]. This is considerably lower than the number put forward by the Vale in the Local Plan Part 2, and was also provided before Pye were aware of the extent of the flood at the site.

Accordingly, the site should either be withdrawn, or the numbers allocated in the plan reduced, i.e. reduce from up to 80 dwellings, to up to 45 dwellings. This is because the current numbers proposed for this site are not deliverable and therefore unsound, 45 dwellings is calculated based on the average density of housing in the village of 16 per ha. The size of the site is 3.433 ha = 55, less allowance for the flood protection ponding.

- 6) Availability of Services. East Hanney is only a small community with limited services and facilities. It is a small rural village without certain basic services such as a commercial shop, and is reliant on car and buses for transport. The bus service is only north south, there being no service east west. To this end the statement provided by the Vale to the inspector in Para AM 15 is an incorrect statement and should be removed from the text of the plan, as this is a factually incorrect statement. Para AM 15 currently says:

'Amendment to paragraph 2.47 to reflect comments in SFRA:

The larger villages of East Hanney and Marcham offer a good range of services and facilities and are relatively unconstrained,'

This should be amended to state 'the village of East Hanney provides only a limited range of services and facilities'. This amendment is proposed because the draft currently implies that East Hanney has services to support the provision of housing. Whereas in fact East Hanney is actually, on the Vale's own assessment criteria based on services, a small village. It does not therefore have the services which would be expected of a larger village, for example, a commercial shop, a mobile library service (this was cancelled by Oxfordshire CC), a pharmacy, a secondary school, dentist, or even a bus connection east/west to Didcot. It is a small rural community with only limited services.

- 7) Flood: The reason for the Local Plan Part 2 is to meet Oxford's unmet housing need. It is therefore solely for this reason that sites in East Hanney are being proposed by the Vale within Local Plan Part 2 as strategic sites. Oxford is stated as being unable to meet its own needs because of certain constraints. In particular, Oxford has identified with having areas of land

subject to flood, and thus unsuitable for development and consequently forming an influencing factor on the shortfall. Thus, the need for this Local Plan.

The site at Ashfields Lane is subject to frequent flood, the risk being to both any developments at the site, and neighbouring properties.

It should be reiterated as it may not have been clear at the hearing that: The site north of Ashfields Lane is at one of the lowest points in the village, and the frequency of flood in this part of the village is such that residents in the neighbouring area have funded a pump to pump water from the surrounding streets, (particularly Ebbs Lane) and that water is currently pumped onto the site, without the continuing capability to do this, existing homes will flood. Further should the field be developed the level of runoff would increase onto the surrounding homes and the water would need to be pumped back as there is nowhere else for it to go. As the site is subject to flood risk, is shown on the flood map as an area of flood, and is therefore contrary to the NPPF and the Vales own policies relevant to flooding, it is not compliant with either the NPPF or the Vales own policies and we therefore remain concerned that the Vale has continued to include it within the Plan.

It seems fundamentally wrong that sites subject to flood such as the site at Ashfields Lane in East Hanney should be promoted by the Vale of White Horse to meet Oxford's unmet need, when flood is one of the reasons for Oxford needing support to meet its unmet need.

Guy Langton, Clerk

On behalf of East Hanney Parish Council