

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Paul Birkby
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. South of East Hanney

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The plan is not justified in allocating 200 houses to the site South of East Hanney. The reasons for this conclusion are:

- 1 The site has not been consulted on with the local community and its inclusion to replace the previous site East of East Hanney is not based on sound reasoning. For example it is stated in the sustainability assessment document section 12.4.1: "East of East Hanney – replace by an alternative site South of East Hanney better connection to the village and also preferred by the community." Whilst it is true that the site proposed in the consultation document was not well connected to the village, it is not clear that the new site is any better connected. The statement that it is preferred by the community is wholly unjustified as there has been no opportunity for consultation on this site.
- 2 East Hanney had 345 properties in the 2011 census. An allocation of 200 houses represents a 60% increase in the size of the village. Locating this many properties on a single 8Ha site cannot enhance the village. The housing density would be significantly higher than the rest of the village. This is not consistent with CP37, CP39, CP44, SO3 or SO11.
- 3 The proposed site to the South of East Hanney would mean extending its existing boundary south and would mean that its boundary was less than 1km from the proposed Grove railway station and housing development. This is clearly shown on the Draft Adopted Policy Map for Abingdon and Oxford sub area where the village boundary will be only two fields from the area reserved for the proposed Grove railway station and the strategic housing site 15 in Grove. This is removing the demarcation of a village and its identity and is against CP37: Design and Local Distinctiveness
- 4 The Infrastructure Delivery Plan does not list any new facilities for East Hanney, the contributions sought will be to develop services in other places. This is not consistent with many of the Core Policies.
- 5 There are no provisions in the Infrastructure Delivery Plan to improve transport links which would promote walking, cycling or the use of public transport. It is particularly noted that East Hanney will not be linked to the Science Vale Cycleway. The flat terrain of the area would be ideally suited to cycling, however, the roads are far too dangerous for most people to consider using, due to them being fast, narrow, unlit and carrying high volumes of traffic including HGVs and buses.
- 6 Although East Hanney has a good bus connection to Oxford this service is currently close to capacity in the rush hour and is severely affected with increased and variable journey times due to the high traffic volumes on the route. This will only be made worse by the housing plans for the Vale, in particular those in Wantage and Grove.
- 7 Core policy 19: Re-opening Grove Station is generally supported, however, the land set aside for this is less than 1km from the proposed extended village boundary. Little attention has been given to the affect this would have on traffic on the A338 through the village.
- 8 The site would adversely affect the local wildlife and no mitigation plans exists for this.
- 9 The plan is not based on credible evidence. Document Reference: Vale Of White Horse District Council Phase 1 Landscape Assessment Of Eight Additional Contingency Housing Sites At East Hanney, Kingston Bagpuize, Harwell Oxford Campus, Proposed Oxford Garden City Site, South Shrivenham and South Radley. Sites Assessed In Addition To Vale Of White Horse Landscape Capacity Study 2014: Contingency Sites (Feb. 2014). Prepared by Kirkham Landscape Planning Ltd / Terra Firma.

For the land South of East Hanney (site 13) the document contains the following conclusions in Table2: "Recommendations –subject to more detailed review: Some very limited potential for development. This would be restricted to the north-edge of the contingency site within the area of grassland to link with the adjacent houses. Development elsewhere would result in harm to the wider landscape, the settlement pattern and its landscape setting, and in a visual impact on the southern approach to East Hanney "

It also states: "Proceed to : Phase 2: NO –only suitable for very small scale housing next to Summertown."

- 1 The plan is not based on credible evidence. Reference: Sustainability Appraisal (SA) of the Vale of the White Horse District Local Plan 2013 Part One. SA Report. October 2014. URS Infrastructure and Environment Limited.

In Section 29.2, in its analysis of the Site South of East Hanney the document states that there that there are no Major Positives, Four Minor Positives, three Neutral, 2 Minor negatives and 2 major negatives.

Appendix 8 of this document contains more details of the assessment of the sites against SA Objective, supporting the evidence that there are no major positives in the site. Of particular note is the following statement in the mitigation for SA 8: : 'Protect the cultural and heritage and provide a high quality townscape and landscape'. **Mitigation:** "Only part of the site should be taken forward in order to avoid adverse landscape and visual effects "

- 1 There is no justification given for allocating development to this site when the evidence base has no major positive effects, but two major negative effects, whilst part of the mitigation states that only part of the site should be taken forward .The plan is unjustified because it is not based on the available evidence.
- 2 The assessment of the Site South of East Hanney against the SA objectives in the Sustainability Appraisal represent a very optimistic view of the arguments for developing this site. The following are examples where the concluded effect is not accurate.

*"2. Availability of services and facilities in towns and rural areas. The site was appraised to lead to **minor positive** effects in terms of availability of services and facilities. The site has good access to local community centre, a Primary School, and local shops, however access to a Leisure Centre, a GP and a secondary school is not as good"*

There are very limited essential services in East Hanney. There is no commercially run shop, (the village shop is run by volunteers and has limited opening hours), there is no GP facility and no Leisure facilities. The primary school has an annual intake of 15 pupils and is already at capacity. The secondary school is 7km away and cannot be cycled to safely.

*"3. Reduce the need to travel and promote sustainable transport The site was appraised to lead to **minor positive** effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Abingdon town centre and bus routes"*

Building 200 houses in East Hanney would not reduce the need to travel. East Hanney has virtually no employment and has very few of the essential services. The statement 'The site has reasonably good access to shops and service' is only correct if you are travelling to them by car. Hence this does not reduce the need to travel.

*5. Reduce inequality, poverty and social exclusion. The site was appraised to lead to **neutral** effects as it has good access to a primary and secondary school*

East Hanney does not have a secondary school. There nearest is more the 7km away and the roads are not suitable for cycling. This should be a negative effect. The primary school is also at full capacity so would need expanding for the above statement to be true.

*"6. Support a strong and sustainable economy The site was appraised to lead to **minor positive** effect in terms of the economy as it is well located for access to employment sites and Wantage town centre."*

The only way to travel to the two biggest employment centres of Milton Park or Harwell is by car. The bus service to Milton Park takes more than an hour and requires a change of bus in Wantage. There are no suitable routes on which to cycle, nor plans to build them.

*"9. Reduce air, noise and light pollution The site was appraised to have a **minor negative** effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan."*

Increased traffic will bring increased noise, light and air pollution. It is not clear what the 'other mitigating policies in the plan' refer to. If you live near to the busy A338 this is a major negative.

*"10. Reduce emissions, the use of resources and improve resource efficiency The site was appraised to lead to a **minor negative** effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result."*

All residents will likely need a car to shop, commute, travel to school and to leisure facilities. This should be a major negative in terms of the Core policies and Strategic Objectives set out in the Plan.

*11. Increase resilience to climate change and flooding. The site was appraised to lead to a **neutral effect** in terms of climate change and flooding. The site could result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.*

The site is partially in flood zone 3 and is upstream of the rest of village that has suffered a number of flooding incidents. The additional runoff into the Brook will increase the levels in the village putting current housing at further risk. This is at best a minor negative, at worse this is a very significant negative for those living in the areas affected by an increased risk of flooding.

- 1 If sites can be allocated for development with so many major negatives then this opens up a significant number of sites for development in the Vale. Many sites were ruled out for phase 1 for the types of negative effects listed in the Sustainability Appraisal for East Hanney. The plan is not justified because this site has been included when it has significant major negative effects and no major positive effects.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

East Hanney should be classified as a smaller village and should only be considered for smaller, sustainable, well designed developments as part of phase 2, provided that necessary infrastructure changes are implemented before the housing is built.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No - I do not wish to participate at the oral examination