



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Mr

n/a

First Name

Oliver

Last Name

Cornish

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

1 The Paddocks

Line 2

Main Street

Line 3

East Hanney

Line 4

Oxfordshire

Post Code

OX12 0HX

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Promoting
Healthy
Communities

Policy

Ch 4
CP4

Proposals Map

East Hanney Housing
site allocation

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

✓

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☐

No

✓

4 (3) Complies with the Duty to co-
operate

Yes

☐

No

✓

Please mark as appropriate.

5. 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 suggested development of 200 houses South of East Hanney was a completely new development for which there was no consultation with the people of East Hanney. In February 2014, a plan to the East of East Hanney was proposed, and discussed at a village meeting. In October 2014, the plan for the development South of East Hanney was in the consultation document.

The impact of any development of 200 houses on East Hanney will be significant. We are a village of approximately 350 houses. The addition of 200 plus houses (the paper states 'around 200 houses'), plus further infill developments will increase the size of the village by around 60%. This will completely change the nature of the community. The designation of East Hanney as a 'large village' is inaccurate. There is one small community shop, staffed by volunteers, and one pub. There are no commercial shops, no petrol stations and no street lights that would normally be associated with the classification of a 'large village'. The school is at capacity, and a small number of children who currently live in the village are being taken by bus to an adjacent school. There are communities that have a facilities score of 7 more than East Hanney, and over 1000 homes, which have been allocated a development site of 220 houses (a 22% increase).

The route from the proposed new development to the school includes a narrow single lane bridge on a corner, which at peak times, cannot currently cope with the traffic demand. This route would have to be used by all the 200 houses needing to go to the school. There is not a continuous footpath along this stretch of road, thus rendering it unsafe for pedestrians. There is no scope for enhancing this stretch (NPPF Planning guidance paragraph 75). There are no public footpaths to offer an alternative route to take.

The current housing density of the village is approximately 3 per hectare. The proposed housing development has 25 homes per hectare. This is not in keeping with the existing community. For the reasons stated, the plan is not legally compliant, is unsound, and does not comply with the duty to co-operate.

6. 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 at 5 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.

There are two issues that need to be addresses in order to make this Local Plan compliant. There needs to be consultation with the local residents about the development south of East Hanney to allow local people to shape their surroundings.

The second issue is to reassess East Hanney to identify if the designation as a 'large village'. Given the lack of facilities in the village, the lack of street lights, the narrowness of some of the roads, it needs to be resolved whether this is an accurate assessment.

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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No, I do not wish to participate at the oral examination

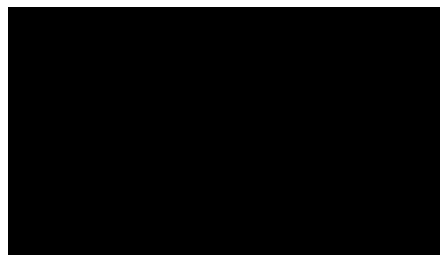
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Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

15th December 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Land South of
East Hanney

Policy

CP4

Proposals Map

East Hanney Housing
site allocation

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

☒

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-
operate

Yes

☐

No

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Please mark as appropriate.

5. 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.

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The second chapter of the NPPF document is entitled "Achieving sustainable Development". There are twelve 'Core Planning Principles' stated. The first one (Section 17 refers) states that planning should "be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues."

The County Council plan initially was to build to the East of East Hanney. There were a number of concerns voiced by local residents at a meeting to discuss this. There was then a switch, sometime after the consultation period, to an alternative site South of East Hanney. There was no consultation with local residents, nor consideration sought of their views. This shows that the development is not plan led, has not empowered local people to shape their surroundings. It is clearly a plan not based on joint working and cooperation.

The proposed development may well end up becoming more closely aligned with Grove, a larger town with many more facilities (2 shopping areas and a total facilities score of 35 as compared with East Hanney's 14). There are potentially better roads, foot and cycle paths linking with Grove, thus making it likely to be further divorced from the East Hanney village community.

6. 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 at 5 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.

There needs to be consultation with the local residents about the development south of East Hanney to allow local people to shape their surroundings. This will achieve the aim of making this part of the Local Plan legally compliant.

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.

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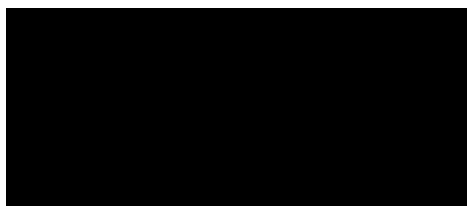
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Signature:



Date:

15th December 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	Land South of East Hanney	Policy	CP42	Proposals Map	East Hanney proposed Housing site: Flood risk
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please mark as appropriate.

5. 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.

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I am extremely concerned with the increased risk of flooding that the proposed development south of East Hanney could bring. The village experienced significant and damaging floods in 2007 and in 2014, and was very close to flooding in 2013. The proposed development is very close to the banks of the Letcombe Brook upstream of the village, and will only increase the volume of water flowing through the village, both from runoff and water processed from the sewerage works.

Part of the proposed development is on areas designated as unsuitable (EHAN05B refers). The Local Plan has no solution to managing the increased water volumes that will be generated by this proposed development. Paragraph 100 of the NPPF states that "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk". The proposed development is in breach of this. Paragraph 101 states "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding". There are other sites that should be considered prior to the one proposed.

Paragraph 103 states that local planning authorities should "ensure flood risk is not increased elsewhere". The proposed development is in direct contravention of this edict.

6. 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 at 5 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.

In order to make this local Plan legally sound, the development will have to be sited at a different location. Because of its location upstream of East Hanney, it cannot fulfil the obligations contained in the NPPF document.

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.

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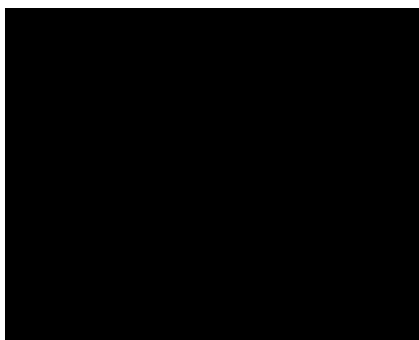
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Signature:



Date:

15th December 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	Land South of East Hanney	Policy	CP44	Proposals Map	East Hanney proposed Housing site: landscape
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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Hanney is an old village rich with a long history. The proposal to build a new housing development south of it will be on of an ancient ridge and furrow site. Since 1984 84% of this type of land has disappeared in England (source: The Wildlife Trust). It is the breeding ground and natural habitat for some of the U.K's most threatened bird life, mammals, wildflowers and insects. A Vale appraisal of the development site south of East Hanney stated that it would bring a major negative effect in terms of the natural environment. They further noted that it is adjacent to a major wild life corridor along the brook, which runs alongside the western boundary of the site, which potentially contains a UK Priority habitat, and this would be threatened by the proposed development.

Many residents enjoy having this valuable asset close by. It is not necessary to destroy this particular locality for housing. There are other more suitable development sites available locally.

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Paragraph 118 of the NPPF document states “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.” The proposed development will not have a neutral effect on the health and wellbeing of local residents.
The solution would be to move the site to an alternative location.

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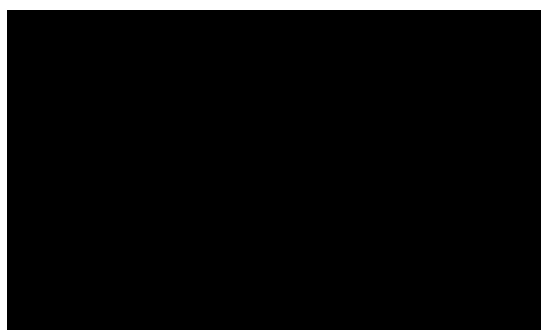
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Signature:



Date:

15th December 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Development
south of East
Hanney

Policy

CP34

Proposals Map

South of East Hanney
Housing proposal:
traffic implications

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

☒

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-operate

Yes

☐

No

☒

Please mark as appropriate.

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The proposed development south of East Hanney will have access onto and off the A338. At rush hour times this is already a busy and dangerous road. Public transport opportunities to centres of employment are slow and infrequent (it takes over an hour by public transport from East Hanney to Milton Park, and longer to Didcot). There is almost no employment opportunity in East Hanney. Therefore, residents of the new development will be travelling to go to work. A principle of the Local Plan is that residents should live near to their place of work. Any development of houses in East Hanney will not be able to fulfil this axiom.

The proposed development will seriously increase the traffic on the A338, particularly at rush hour times. The development proposal East of East Hanney allowed access on both the A338 and the Steventon Road, which leads to major employment centres (Didcot, Milton Park, Harwell,), and to the A34. This would alleviate some of the congestion of the A338.

6. 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 at 5 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.

Including the development site south of East Hanney demonstrates that the plan has not been "positively prepared", as it is consistent with achieving sustainable development. This makes the plan 'unsound'.

To make the Local Plan 'sound', the location of the development needs to be reassessed.

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.

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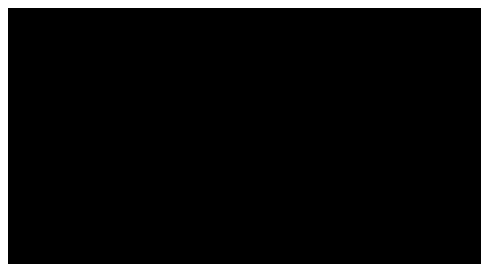
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