



**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

First Name

Steven

Last Name

Moss

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Millside

Line 2

Mill Orchard

Line 3

East Hanney

Line 4

Oxfordshire

Post Code

OX12 0JH

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

Policy

Proposals Map

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.

Strategic Allocation at East Hanney

The proposed allocation of the 'South of East Hanney' site for the development of around 200 homes is inappropriate and flawed for a significant number of reasons:

Flooding

The residents of East Hanney know all too well that the village is prone to flooding associated with the Letcombe Brooke and the surrounding area known as the Island villages. There has been flooding in the vicinity of the proposed site in four of the last seven years alone – 2007, 2008, 2010 and 2014, the first and last year's floods being very significant and damaging. The fields to the south of the village either side of the Brook provide valuable holding and slow drainage capacity which protects the village in less onerous weather conditions. To propose significant development on an upstream site immediately adjacent to the Brook and in these fields, which will undoubtedly increase the flood risk to the existing village (in addition to the uncertain consequences of the significant developments proposed for Grove and Wantage), is contrary to the NPPF and to the proposed Core Policy 42.

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*", 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*" and Paragraph 103 of the NPPF states that local planning authorities should "*ensure flood risk is not increased elsewhere*".

Highways

The proposed 'South of East Hanney' development is for "around" 200 dwellings. The TRICS database suggests that 200 dwellings would lead to an increase in vehicular trips of around 160 trips during both the morning and evening peak hours. The A338 is already predicted to operate at, or over, capacity and hence this amount of traffic would have a significant impact on highway capacity.

The traffic modelling exercise which was carried out (in the Evaluation of Traffic Impacts Study) in support of the Draft Local Plan assumed the development to be on the 'East of East Hanney' site and did not take account of the change in location to the 'South of East Hanney' site. There is therefore no evidence base which informs the proposed allocation of this site. Bearing in mind the A338 is predicted to operate at 93-97% of capacity during the PM peak hour, the introduction of a significant number of right-turning movements because of the change of location of the proposed site is likely to increase the severity of the congestion and other consequential effects.

The introduction of a new access junction south of East Hanney could also further compromise highway safety being in close proximity to existing junctions at East Hanney.

There do not appear to be any improvements specific to this proposal, which will mitigate the inevitable significant impacts on highway capacity and road safety. Similarly, no Transport Assessment work appears to have been completed which would confirm the acceptability of this site in highway capacity/safety terms.

The proposed site is not well connected to the existing village. There are no footpaths along Summertown between the site and the village. Neither is there a footpath linking Millside to Brookside where the road narrows to single track width with sub-standard visibility around a sharp bend over a hump-back bridge. There is no scope to add a separate footpath along this section of highway. There is therefore no safe pedestrian route which can be used to link the proposed site to the school and village hall/shop, the only significant facilities. With this in mind, it may also be reasonably expected that a significant proportion of children travelling between the proposed development site and the primary school would be ferried by car necessitating additional potentially aggravating turning movements at a number of East Hanney junctions during peak hours, as well as the need for additional drop-off provision in the vicinity of the school.

The limited existing bus services which run past or partly through the village are not considered to be suitable for use by commuters, e.g. the travel time between the village and Didcot rail station is over

one hour (change of bus required). It is probable, therefore, that the majority of workers from the proposed new site would drive for convenience.

As explained above, the village lacks many basic amenities, and new residents would need to travel out of the village for the majority of their daily needs, for example to the nearest retail outlets. As there is a lack of sustainable travel choices (as set out above), there would continue to be a dependency on the private motor vehicle and the need to travel would be increased.

In transport terms, development of the 'South of East Hanney' site would not be in line with the aims and aspirations of the NPPF for a number of reasons: the site is not sustainable (contrary to paragraph 29), the site will create a reliance on car travel, increasing congestion and increasing greenhouse gas emissions (contrary to paragraph 30), the site will not provide safe and secure access for all people (contrary to paragraph 32), the site is not located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (contrary to paragraph 34). In addition, the development is not in line with proposed Core Policy 17 of the draft Local Plan as no specific mitigation is proposed, and is also at odds with proposed Core Policy 33 as the impacts of new development on the strategic and local road network will be worsened and not minimized as required.

Natural Environment

Aside from the fact that much of the land which comprises the 'South of East Hanney' site is rare having only been used as orchard or casual grazing land for many years, the area is known to support a wide range of wildlife. This should be protected. The East Hanney Community response to the Plan sets out the detailed reasons for preventing development of the proposed site in the interests of wildlife, bio-diversity and general ecological importance. This is not unconnected with the land's important contribution to mitigating flood risk.

Vale's Own Site Assessment Work

In support of the Spring 2014 draft of the Local Plan, the VWHDC published [notably some time after the Spring consultation] their Strategic Housing Land Availability Assessment (SHLAA). Appendix 8 dealt with a range of sites for consideration in East Hanney. Site EHAN05B, which forms the northern part of the proposed 'South of East Hanney' site was determined to be 'Undeliverable'. The assessment cites the reasons for this as including adjacency to a Conservation Area and listed building, archaeological constraint, Flood Zone (2&3), adjacency to a water course and lack of pedestrian access. These constraints still apply so how can this part of the proposed site now be presented as acceptable? This is unreasonable and unjustified.

In addition to the above points, there are a range of other considerations, such as Heritage, Loss of Character and Identity [of the existing village] and Sewerage which also strongly suggest that the proposed 'South of East Hanney' site has not been properly justified. These factors are set out in more detail in the East Hanney Community Response to the Draft Plan.

Accordingly, the proposed allocation of the 'South of East Hanney' site for 200 homes has not been properly prepared or justified and the draft Local Plan is, therefore, unsound.

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.

The proposed strategic allocation of the 'South of East Hanney' site for residential development should be removed from the Plan. If there remains a need for East Hanney to accommodate some residential development over and above that which has been developed recently, is under development or may be approved outwith the Plan, then consideration could be given to one or more smaller groups of dwellings on more suitable sites, subject to proper 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?

☐

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

☐

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:

11 Dec 2014

