



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

David

Last Name

Price

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Rowans Orchard

Line 2

East Hanney

Line 3

Wantage

Line 4

Oxon

Post Code

OX12 0JG

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	<div>Chapter 5</div>	Policy	<div>Core Policy 8: Spatial Strategy for Abingdon-on- Thames and Oxford Fringe Sub-Area</div>	Proposals Map	<div>Site to the South of East Hanney</div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div></div>	No	<div>✓</div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>✓</div>
4 (3) Complies with the Duty to co- operate	Yes	<div></div>	No	<div>✓</div>

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.

My comments on “Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area” relate to the proposed development to the South of East Hanney. Please see my objections below on separate sheets.

(continue on a separate sheet/expand box if necessary)

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.

It is not possible to make the site to the South of East Hanney “legally compliant” because there was no prior consultation with the residents regarding this site by the Vale.

It is not possible to make the site to the South of East Hanney “sound” because development of the site would directly contravene the National Planning Policy Framework and the Vale’s own policies.

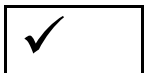
I therefore believe that the site to the South of East Hanney should be removed from the Plan.

If houses must be built in East Hanney they would be better built on the brown field infill sites that have already been suggested by the Parish Council or, if the Vale insists on a large single site, built on the original site that the Vale proposed to the East.

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:

18th December 2014

A Tale of Two Sites



For reference: the picture on the left above shows the original 8 hectare East site, that on the right shows the 8.2 hectare South site. Note the Letcombe Brook flows from the bottom of the pictures (from Grove) along the West of the Southern site, towards and through the village. The “arrowhead” (North Western) part of the South site was originally declared “undeliverable” by the Vale. Dandridges Mill (Upper Mill) is at the tip of this “arrowhead”. The orchard is denoted by the tree symbols in the South site.

Lack of Consultation

A residents’ consultation in Spring 2014 was undertaken with reference to a single site to the **East** of East Hanney. In October 2014 my wife heard from a neighbour that the site had been changed to a site to the **South** of East Hanney.

A search of the Vale’s website revealed that on page 57 of the document "10_07_14_SA Report Appendices FINAL v1", the Vale states that this Southern site is “preferred by the community”.

This is simply not true as the residents have never been asked by the Vale about this site to the South of East Hanney!

Section 17 of the NPPF lays out a set of core planning principles, the first talks about “*empowering local people to shape their surroundings*”. The NPPF also requires the Plan to be prepared “*in accordance with legal and procedural requirements*”.

I believe the lack of consultation process:

- a) contravenes the commitments in the Vale’s own “Statement of Community Involvement”;
- b) questions the validity of the Plan under the criteria of Legal Compliance; and
- c) is not consistent with national policy, as required by the NPPF.

I therefore believe that the Plan is not “sound”.

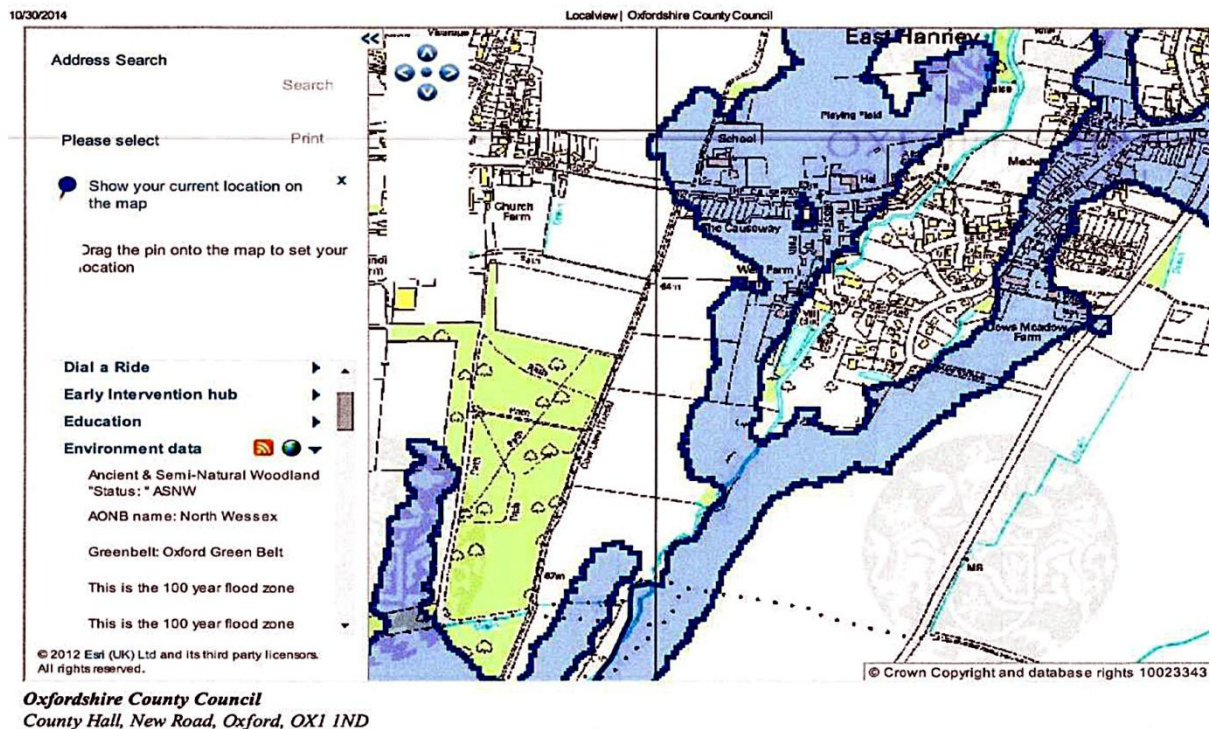
Flooding

East Hanney has had four serious floods in the last ten years alone, badly affecting infrastructure and homes.

The site to the South of East Hanney is upstream of the pinch-point on the Letcombe Brook at the Upper Mill (Dandridges Mill).

Development of this site, given the increase in processed water from the upstream sewage treatment works, run-off and loss of ground absorption by destruction of the fields etc. will increase flood risk to the whole of the existing settlement.

Oxfordshire County Council's flood map below shows the proposed development site to be on the flood plain, the Vale appears to have ignored this thus, in my opinion, showing a lack of Duty to Cooperate.



I simply cannot understand how the site to the South of East Hanney was appraised by the Vale to lead to a "neutral effect in terms of climate change and flooding.... The site contains a small area of flood risk."

- **Picture 1** shows flood water has forced its way through, deforming the garage door, at Dandridges Mill. (See A Tale of Two Sites above for relative location).
- **Picture 2** shows flood water looking downstream from Dandridge's Mill. The submerged road is to the left (a Land Rover is visible) and the Brook is to the right of the wall in the centre of the picture.



Picture 1



Picture 2

The Vale's Core Policy 42 states: *The risk and impact of flooding will be minimised through:*

- *directing new development to areas with the lowest probability of flooding...*
- *ensuring that development does not increase the risk of flooding elsewhere...*

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"*.

Alternative sites have been put forward by the Parish Council that would not increase the flood risk to the village.

I believe that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- a) is not consistent with the Vale's own core policies;
- b) is not consistent with national policy, as required by the NPPF;
- c) shows a lack of duty to cooperate with OCC; and
- d) is not justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives.

I therefore believe that the Plan is not "sound".

Ecology and Environment

Even the Vale's own sustainability appraisal for the site South of East Hanney describes a *"major negative"* effect in terms of the natural environment as *"an important wild life corridor... ..runs alongside the Western boundary of the site"* and *"contains potential UK Priority Habitat"*.

The wild life corridor along the Letcombe Brook is a habitat enjoyed by both protected and endangered species. An irreversible loss of wild life is inevitable if these breeding grounds are disrupted or destroyed.

Destruction of these green fields and an orchard that is over 100 years old is totally unnecessary when alternative "brown field" sites have been suggested by the Parish Council and where loss to the natural environment would be far less damaging.

I simply cannot understand how the Vale, having recognised that the North Eastern section of the Southern site is unsuitable (designated as "undeliverable" in the Vale's document Appendix 8) then decided to include this site in the final version of the Local Plan.

Paragraph 9 of the NPPF document talks about *"moving from a net loss of bio-diversity to achieving net gains for nature"*. Paragraph 17 states *"Allocations of land for development should prefer land of lesser environmental value"*. Paragraph 109 states *"The planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity"*. Finally, Paragraph 118 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 proposal to develop to the South of East Hanney is directly at odds with the Vale's Core Policy 46: Conservation and Improvement of Biodiversity, along with Core Policy 44: Landscape, and Core Policy 45: Green Infrastructure.

I believe that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- a) is not consistent with the Vale's own core policies;
- b) is not consistent with national policy, as required by the NPPF;
- c) is not justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives.

I therefore believe that the Plan is not "sound".

Sewage

Sewage issues and failures have already started to occur in the village because the sewerage works for the area are currently at full working capacity.

Significant investment into the upgrade of the sewerage works must be completed before building work begins if it is to manage the increased levels of sewage from the developments at East Hanney and Grove. A higher risk of exposure to sewage problems for villagers will otherwise be inevitable.

The Vale's sustainability assessment for East Hanney states: *"Site is unlikely to be able to support anticipated water and wastewater demand."*

Thames Water has said that it does not have the capacity or plans in place to be able to cope and that it will take years for them to be able to address the need.

This shows that the statement from the Vale's guidance document *"Delivery partners are on board and signed up"* is not true in the case of Thames Water.

I believe, therefore, that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- a) shows a lack of duty to cooperate with Thames Water; and
- b) is not effective, as required by the NPPF, as this site is not deliverable.

I therefore believe that the Plan is not "sound".

Sustainable Transport and Accessibility

In the Vale's sustainability report, development of the site to the South of East Hanney was appraised by the Vale to lead to *"minor positive"* effects in terms that include the need to travel, and reducing road congestion.

A principle of the Local Plan is that residents should live near to their place of work.

There is almost no employment in East Hanney, so residents of any new development will almost certainly be obliged to travel to a place of work elsewhere. It takes more than an hour to travel, via two consecutive bus routes, from East Hanney to Milton Park (the nearest business and science park) so private cars are likely to be used instead, adding to the congestion issues and creating green house gas emissions.

The Vale's Core Policy 33: Promoting Sustainable Transport and Accessibility states:

The Council will work with Oxfordshire County Council and others to:

- *actively seek to ensure that the impacts of new development on the strategic and local road network are minimised*
- *ensure that developments are designed in a way to promote sustainable transport access both within new sites, and linking with surrounding facilities and employment*

Alternative sites built nearer to the main centres of employment would minimise the impact on the strategic and local road network.

The Vale's Core Policy 37: Design and Local Distinctiveness states:

All proposals for new development will be expected to be of high quality design that:

- *is well connected to provide safe and convenient ease of movement by all users, ensuring that the needs of vehicular traffic does not dominate at the expense of other modes of transport including pedestrians and cyclists, or undermine the resulting quality of places.*

I believe, therefore, that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- a) is not consistent with the Vale's own core policies;
- b) is not justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives

I therefore believe that the Plan is not "sound".

The East Hanney site should be removed from the Plan and homes built nearer to the centres of employment or within reach of direct, efficient, affordable public transport that is well linked to employment centres.

East Hanney compared with other villages in the Vale

Villages have been categorised by the Vale as "larger" or "smaller" based on a "facilities score" (from VoWH Town and Village Facilities Study - Feb 2014). A score of 14 or above designates a village as "larger". East Hanney scores 14, although the anticipated loss of the mobile library will reduce this to 13 soon. According to the 2011 Census, East Hanney had a population of 748 residents housed in 334 homes.

Why has the area to the South of East Hanney been included as a strategic development site in the Plan? The chart below illustrates that East Hanney stands out as a strange choice.

- East Hanney is the only village with a facilities score lower than 15 earmarked for development.
- The only other strategic development site in a village with a population of less than 2,000 is very near to a business & science park and scores +3 in the Vale's sustainability assessment, compared to -2 for East Hanney. It also has a facilities score of 16 compared to our 14 (soon to be reduced to 13).
- 10 Villages with populations greater than East Hanney and with a facilities score either the same as, or higher than, East Hanney have not been earmarked for development. These are (with facilities scores in brackets):
 - Wootton (24)
 - Watchfield (20)
 - Steventon (20)
 - Drayton (20)
 - Cumnor (17)
 - Blewbury (16)
 - East Hendred (16)
 - Marcham (15)
 - Uffington (14)
 - East Challow (14)
- There are an additional 4 villages to those detailed above that have a population greater than East Hanney that have not been earmarked for development (population in brackets):
 - North Hinksey (4,535)
 - Appleton (915)
 - Sunningwell (904)
 - Chilton (894)
- Note that the parish of "St Helen Without", which includes the villages of Shippon and Dry Sandford, has a population of 3,165 and has also not been earmarked for development.
- As a comparison example – Sutton Courtenay received a facilities score of 21 and, according to the 2011 Census, had 1007 homes. It has been allocated a development site for 220 houses which increases Sutton Courtenay's total number of homes by 22%. Compare this with the 60% homes increase for East Hanney.

East Hanney compared with other villages in the Vale

Strategic development sites are denoted in red

Number of Residents

10,000

8,000

6,000

4,000

2,000

0

Wantage
Grove
Great Faringdon
Cumnor
North Hinksey
Kennington
St. Helen Without
Radley
Wootton
Sutton Courtenay
Drayton
Harwell
Kingston Bagpuize with Southmoor
Shrivenham
Stanford in the Vale
Marcham
Watchfield
Blewbury
Stevenon
Milton
East Hendred
Appleton-with-Eaton
Sunningwell
Chilton
Uffington
East Challow
East Hanney
East Hanney, 748
Longcot
Buckland
Childrey
Letcombe Regis
Longworth
Ashbury
West Hanney
Fyfield and Tubney
Upton
South Hinksey
West Hendred
Great Coxwell
Appleford-on-Thames
Hinton Waldrist
Bourton
Charney Bassett
Ardington
Sparsholt
Fernham
Littleworth
Frilford
Garford
Kingston Lisle
Woolstone
West Challow
Lockinge
Buscot
Shellingford
Dendworth
Hatford
Coleshill
Letcombe Bassett
Little Coxwell
Wytham
Goosey
Baulking