

ADDITIONAL INFORMATION TO BE SUBMITTED IN RESPONSE TO THE PROPOSED LOCAL PLAN FROM THE VALE OF WHITE HORSE DISTRICT COUNCIL.**CORE POLICY 8**

Proposal for 200 houses to be built in East Hanney. This document sets out reasons why this proposal is cannot meet the National Planning Policy Framework (NPPF) core policies and therefore cannot proceed.

Inclusion in Sub Category - Abingdon on Thames and Oxford Fringe.

To include the proposed site of East Hanney in this sub areas is preposterous. Hanney residents make use of facilities within Wantage and Grove. Some facilities are accessed in Abingdon, but most facilities such as secondary schools consider East Hanney as a catchment for Wantage. Residents of East Hanney register primarily with the health centre /surgeries of General Practices in Wantage and Grove, not Abingdon or Oxford.

By including East Hanney with this area, none of the benefits proposed in the Infrastructure Delivery Plan for Abingdon and Oxford Fringe will benefit the residents in East Hanney. For example there are proposals to increase capacity at schools within Abingdon but within East Hanney (Oxfordshire County Council Pupil Placement Plan 2014-2018). It is unlikely therefore that residents will benefit from the expansions in Abingdon due to the increased distance to them. Therefore, there will be a large shortfall in pupil placements for East Hanney residents. Appendix 9 of the Sustainability Assessment from the Vale of the White Horse District Council (VWHDC) Local Plan Part 1 identifies a lack of secondary school facilities for people of East Hanney. It also states that there will need to be an increased capacity for primary school pupils. However in the Oxfordshire County Council Pupil Placement Plan 2014-2018 there are no expansion plans at St James primary school in East Hanney.

The development proposals for Grove (Grove Airfield 2500 houses) and Wantage (Crab Hill 1500 houses) and those of Didcot and the Harwell sites will have an impact on how the residents of Hanney will travel through the county, with massive impact on the road network. By including East Hanney in the sub area of Abingdon on Thames this impact is completely ignored in the Local Plan.

Proposed Site of of 200 Houses in East Hanney

The original proposed site was to the east of the main village, and this is the site that has been consulted on with the community and parish council (Draft Local Plan Feb 2014). In the published Local Plan in October 2014 the location of the site has been changed to the south of the village. This has been changed without proper consultation with the community and the parish council.

The VWHDC Local Plan October 2014 does not meet National Planning Policy Framework (NPPF) as it fails to ensure the sustainability of the development, in that it does not meet the needs of the present community and it will compromise how the needs of future generations are met. The Local Plan 2014 fails to meet the environmental role of development as set out in the NPPF. It does not protect the natural environment (places it at increased risk from flooding). The current proposed site to the south of East Hanney has sever issues making it completely unsuitable for development for housing. To directly cite from the Local Plan's own documents - Sustainability Assessment - South of East Hanney (200 homes) Part 3 Findings and Recommendations - only 4 minor positive reasons were listed in favour of this proposed site, against 2 **major negative** and 2 further minor negative reasons against this site. The major negative impacts were in relation to impact on the natural environment and loss of cultural heritage and landscape. The minor negative impacts were in relation to pollution and inefficient resource use (mainly due to loss of green spaces).

The listed minor positive findings in support of development are at best minor and highly debatable. These suggest that the development would improve services and facilities for East Hanney, but as part of the Sub Area of Abingdon and Oxford Fringe, these improved services will not benefit residents of East Hanney at all (all are located in Abingdon and Oxford). It is suggested that this development will have a minor positive impact on reducing the need for people to travel. How this is evidenced or quantified is not stated and as it also suggests that the development in East Hanney will have a minor positive effect on supporting the economy of the area, it implies people will indeed be traveling to local employers requiring travel. There these points cancel each other out, the new residents of East Hanney cannot add to the economic well being of the area if they cannot travel to their place of work (outside the village). This will also be made harder to achieve due to the congestion on the roads directly linked to the village being caused by the developments in Wantage and Grove.

The proposed 200 additional housing required has been interpreted by the VWHDC from their commissioned Strategic Housing Market Assessment (March 2014). The Local Plan Oct 2014 fails to acknowledge the recent and ongoing housing development sites within East Hanney currently, which are already expanding the village and meeting the housing needs indicated in the Strategic Housing Market Assessment (March 2014).

Flooding

The area of East Hanney is included in the Environment Agency's "*areas susceptible to ground water flooding*" with a "*high risk of ground water emergence*". in 2007 and 2009 and 2013 East Hanney was subjected to sever flooding resulting from excess surface water not being managed by the Letcombe Brooke. The proposed site to the south of East Hanney will directly impact on the flow of water in the Letcombe Brook. The additional housing will increase the run off's and sewerage which will place the rest of the village at greater risk of flooding. The Local Plan has no reference to how this will be addressed or managed.

Delivery of Infrastructure.

The VWHDC Infrastructure Delivery Plan Oct 2014 states

"it is essential that there is sufficient infrastructure to support growth to achieve sustainability" (pp3, para 1.6).

The document then fails to demonstrate that this is possible for the following reasons:

Transport

It has been mentioned in sections above that the roads surrounding the proposed site of East Hanney for 200 homes will be directly impacted by the huge development of the Wantage and Grove areas. The main roads through Wantage and Grove to connect villages and towns and places of work are already at maximum capacity with frequent grid lock delays through A338 and A417. The Local Plan (Oct 2014) states that there will be improvements at A338 junctions and that bus stops and increased buses will be provided. It is not clear how these minor junction improvements will increase the road capacity of the additional 4000 proposed houses in Grove and Wantage in addition to 200 in East Hanney. The suggestion that people will be working in Oxford (Sustainability Assessment South of East Hanney, Part 3) is highly unlikely as people will not be able to reach Oxford city. I currently commute into Oxford for work and it takes me 1 hour leaving at 06:30am for a 15 mile journey. Without increasing the road capacity (duelling the road) it will not be possible to accommodate the increase in traffic along A338 resulting from the proposed development.

Health and Emergency Services

The VWHDC Infrastructure Delivery Plan October 2014 states that there has been no engagement with Thames Valley Police to identify how they will manage such wide scale development in the area and no response from the Fire or Ambulance service. The local Clinical Commissioning Groups have not identified how they will respond to the increase need for health service provision as a result of the proposed housing development. There is currently waiting lists for community health services and continual cuts enforced on NHS providers. Without any clear idea of how the additional residents will be cared for when they are ill, protected when they are at risk and rescuing from fire or emergency situation, the VWHDC proposes to provide "safe" homes in the Local Plan. This is clearly not the case. The Infrastructure Delivery Plan Oct 2014 states that there will need to be an increase of Doctors in the areas but does not state how this will be achieved.

Schools

As outlined previously, East Hanney primary school has not been identified as being one of the schools Oxfordshire County Council is considering to expand in their Pupil Placement Plan 2014-2018. There are proposals to increase capacity in Abingdon schools and also build new schools in Wantage, Grove and Didcot. What is not made clear in any of the documentation is where the new residents of the 200 homes proposed in East Hanney will be expected to try to go to school. The plan also states that there will only be an increase of 6 pupil places in the special school in Wantage and no specialist resource provision in schools in Wantage and Grove. The additional 4000 homes proposed in developments across Wantage and Grove and the 200 houses in East Hanney is going to lead to a need for increased provision of special needs education and this is not addressed in the Local Plan 2014 in relation to Core Policy 8 at all.

Funding of Infrastructure

The VWHDC Local Plan and supporting documents (such as Infrastructure Delivery Plan Oct 2014) state that the required infrastructure to support the proposed development will be funded through a combination of Community Infrastructure Levy (CIL) (payable by the developers) and s106 Planning Obligations (Planning Act 2008). The s106 is payable in relation to affordable housing where as the CIL cannot be applied to this type of housing (some 35% of the proposed development). The s106 contributions are to cover what is deemed acceptable to make the development viable in planning terms only (Planning Act 2008). The CIL can pool payments for set projects and this means that projects such as the proposed new schools and school places in Wantage and Grove and Abingdon will be part funded by CIL gained from the East Hanney development but will not benefit the residents of East Hanney, as St James primary school has not been identified to have capacity increased in Oxfordshire County Councils Pupil Placement Plan 2014-2018.

The Local Plan 2014 does not detail what tariff is to be applied to the development sites and where the funds will be used. The Local Plan 2014 only states that funding for much of the infrastructure will be paid for by a combination of S106 and CIL. Looking at the development recently completed in Didcot and the document: Land North East Didcot Development Framework Document March 2011 this also states that increased schools, sports centres, community centre and shops will be supported by CIL and s106 funding. A BBC news article reported on 08/12/14 (<http://www.bbc.co.uk/news/uk-england-oxfordshire-30374134>) states:

The first residents moved into Great Western Park, Didcot in 2011, but a planned shop is lying empty and a bus shelter is yet to be built.

A new primary school, due to open in 2015, has also been delayed by a year.

The developers said it hoped a shop and post box would be provided shortly as the number of residents increase.

John Ord, a Didcot town councillor who was one of the first residents to move in, said: "Lots of things have been promised but very little delivered. We're cut off."

This does not give confidence that the proposed development in the VWHDC Local Plan 2014 will have sufficient infrastructure put into place, before, during or after the development has been built and this cannot therefore achieve the VWHDC Infrastructure Delivery Plan's 2014 own objective (1.11) which states *"it is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion"*

It is also suggested that some of the infrastructure required would be funded by Oxfordshire County Council (OCC), such as some of the main road improvements. However OCC's website states it has to make some £20M savings which will impact on budgets for roads. The OCC road reporting section of their website reports hundreds of existing road sites needing repairs, as well as extensive road improvement schemes currently underway. It is questionable then that they will be able to contribute towards the proposed road improvement schemes, when they state that:

"(2014) 50% of OCC budget is spent on social care for adults and children and by 2020 75% of OCC budget will be spent on social care for adults and children reducing available funds for roads, libraries and recycling"

(<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/aboutyourcouncil/council-taxandfinance/budgetInfographic.pdf>)

CONCLUSIONS

- The proposed development site of the south of East Hanney has not been put out for consultation prior to the publication of the Local Plan Oct 2014. the original site in East Hanney was to the east of the village and this had previously been identified and open for consultation with parish council and local community. The change of site was not previously known about by the village or parish council and therefore has not been subject to appropriate consultation processes.
- The proposed development of south of East Hanney does not meet NPPF criteria as it is not sustainable for current residents needs nor those of gene



rations to come.

- The VWHDC's own Sustainability Assessment (South of East Hanney Part 3 Findings and Recommendations) lists greater negative impact of the proposed development outweighing the positive benefits.
- The site south of East Hanney will increase the risk of flooding in the rest of the village.
- The development to the south of East Hanney will reduce agricultural land availability and negatively impact on the natural environment (VWHDC Sustainability Assessment). It will have negative impact on road networks which have no capacity for increased usage and there is no capacity within primary or local secondary schools. There is no access to additional school places for increased numbers of residents of East Hanney sited anywhere in the Local Plan Oct 2014 or in the OCC Pupil Placement Plan 2014-2018.
- The Local Plan 2014 fails to identify how Thames Valley police will be able to meet the needs of an increased population. It fails to identify how health and emergency services will meet the needs of an increased population as it has not engaged Thames Valley Police, NHS England, Local Clinical Commissioning Groups, Fire service or Ambulance Services.
- The VWHDC Delivery of Infrastructure Strategy (July 2014) and Plan (Oct 2014) state that infrastructure needs to be delivered in a timely way to make the development possible. The VWHDC is relying heavily on CIL, s106 and OCC funding for the required infrastructure. These funding sources are not reliable due to the cuts being made in OCC and the evidence from recent development in Didcot and failure of developers to provide promised infrastructure.

16/12/14