



**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	Mrs	
First Name	Jacqueline	
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	Chapter 5	Policy	Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area	Proposals Map	Site to the South of East Hanney
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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.

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” all relate to the proposed development to the South of East Hanney. I believe this site is totally unsuitable for development - please see reasoning 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.

The site to the South of East Hanney should be removed from the Plan.

Should East Hanney, despite the significant weight of evidence showing that the village is completely inappropriate for such development, be obliged to accept additional housing then alternative and more appropriate sites should be considered such as infill sites as proposed by the Parish Council or, as a last resort, the original site 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:

To explain the true nature of the site and the village, to ensure that the Inspector understands the consequences of any development in this area and to convey the passion felt by both myself and the majority of the residents of East Hanney in our objection to the inclusion of the site to the South of East Hanney in the Local Plan.

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:

17 December 2014

Flawed Consultation

The consultation in Spring 2014 was undertaken with reference to a single site to the **East** of East Hanney. I was alerted in October 2014 to the change in site by a neighbour who had heard from two tenants that they had been given notice to leave the proposed site **South** of East Hanney.

Repeated requests have been made to the Vale, both directly and via the Parish Council, for clarification and justification on:

- why the site was changed to an alternative site to the **South**, sometime after the consultation period, without notice to residents, and
- why this alternative site has never been the subject of any proper resident consultation by the Vale.

Despite these requests no credible answers have been forthcoming.

Research undertaken by the East Hanney Parish Council sub-committee confirms:

- an overwhelming majority of the residents were **not** aware that the site had been changed, and
- the Vale, in document 10_07_14_SA Report Appendices FINAL v1, stated that South site is the preferred choice of the community. This is certainly **not** the case. (It is not clear from where this statement came.)

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 consultation process was utterly flawed in execution and did not adhere to the commitments in the Vale’s own “Statement of Community Involvement”.

I believe the arguments above demonstrate that inclusion of the development site South of East Hanney in the Plan proposed by the Vale **fails under the criteria of Legal Compliance**. Furthermore, the Plan is **NOT** consistent with national policy, as required by the NPPF, and is therefore “**unsound**”.

In exasperation, whilst trying to understand how to respond to the Local Plan for this current round of Consultation, I wrote to the Plain English organisation. Their response is as follows and meets with views of all the residents who have battled with the Vale’s website, forms and “guidance”.

From: **Tony Maher** [REDACTED]
Date: 1 December 2014 at 10:46
Subject: RE: "Provide your comments" Vale of the White Horse District Council Local Plan
To: Jacqueline Price [REDACTED]

Dear Jacqueline

Thank you for your email.

Just like the questionnaires that circulated last year, this local plan is filled with gobbledygook.

The definition of what ‘soundness’ is baffles you before you have even read the plan.

The assumption that everyone is familiar with the NPPF and so can judge if the plan is an effective one that is consistent with national policy is also beyond me.

I am afraid this plan is like many others – far too difficult to respond to. It simply excludes most people from making comments.

We raised this issue last year but I will make a point of trying to write a story about the plans themselves (rather than the questionnaires) next year.

You get the feeling they really don’t want anybody to make any suggestions.

I hope this helps for now.

All the best

Tony Maher, Manager

Flood Risk

The East Hanney area is well known to be prone to flooding and the existing village has experienced significant and damaging floods **four** times in the last ten years alone, badly affecting roads and homes. Development on the proposed site South of East Hanney under current proposals will increase flood risk to the whole of the existing settlement.

As the site proposed is upstream of the mill on Letcombe Brook, the development of additional homes will result in an increase in the volume of water (including both processed water from the sewage treatment works and run-off) being pumped into the brook, and subsequently passing through the existing village. The Plan lacks any solution to management of the elevated water volumes. The lower fields are always either close to or at saturation point and once their absorption abilities are lost the risk of flooding on the streets of the village, and into homes, will inevitably be increased. Note that all of East Hanney is at the highest risk of groundwater emergence, according to the Environment Agency's "Areas Susceptible to Ground Water Flooding" map.

The flood authority for Oxfordshire is the Oxfordshire County Council, and whilst the OCC's flood map 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.

A principle of the Local Plan is to increase resilience to climate change and flooding. The site South of East Hanney was appraised by the Vale to bring about a "*neutral effect in terms of climate change and flooding... The site contains a small area of flood risk.*" This is a completely inaccurate assessment with serious understatement and can easily be challenged by documented evidence to the contrary.

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.

The arguments above demonstrate that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

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

Therefore the plan is "**unsound**".

There may also be a case for **lack of Duty to Cooperate** with Oxfordshire County Council.

Conservation and Improvement of Biodiversity

A principle of the Local Plan concerns natural environment, biodiversity, water and soil quality. Development of the site South of East Hanney was appraised by the Vale to bring about 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*”.

Indeed, the site proposed includes a recognised wild life corridor along the Letcombe Brook which 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.

The Plan would also lead to the destruction of green fields and an orchard that is over 100 years old. This seems totally unnecessary and brutal when alternative “brown field” sites have been offered by the Parish Council and where loss to the natural environment would be far less extensive and damaging.

The orchard site, now included in the final version of the Local Plan, was at one point fully recognised by the Vale as being unsuitable as it was deemed “*undeliverable*” in the Vale’s document Appendix 8. The reversal of this decision in the final plan has never been explained.

From my personal viewpoint, and many others that have chosen to live in this village and that share my passion for nature and the wildlife here, the rich diversity in this area contributes greatly to the quality of life we enjoy. Yet, in the sustainability report, development of the site to the South of East Hanney was appraised by the Vale to have a “*neutral*” effect on the health and well-being of residents. I completely disagree.

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.

The arguments above demonstrate that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- is **NOT** consistent with the Vale’s own core policies;
- is **NOT** consistent with national policy, as required by the NPPF; and
- is **NOT** justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives.

Therefore the plan is “**unsound**”.

Sewage

It is known that the sewerage works for the area are currently at capacity, giving rise to sewage issues and failures that have already started to occur. Anecdotal accounts from many of the villagers are testament to this.

There will not be sufficient capacity to manage the increased levels of sewage from the new homes at East Hanney, and also those at Grove, unless significant investment into the upgrade of the sewerage works is completed in **advance** of development. A higher risk of exposure to sewage problems for villagers will otherwise be inevitable.

Indeed the Vale in their sustainability assessment for East Hanney comment: *“Site is unlikely to be able to support anticipated water and wastewater demand.”*

Thames Water has stated 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 that the lack of any suitable proposal and accompanying schedule for providing a solution to the sewage issues means the Plan is not deliverable, and so not **“effective”** as required by the NPPF, and is therefore **“unsound”**.

There may also be a case for **lack of Duty to Cooperate** with Thames Water.

Natural Resources

In the sustainability report, development of the site to the South of East Hanney was appraised by the Vale to bring about a *“neutral effect in terms of climate change and flooding”*.

However, in the Vale’s own words: *“...developing this site could result in the loss of Best, Most Versatile Land.”*

This statement shows that the Vale is conflicting directly with its own Core Policy 43: Natural Resources in which it is stated:

All development proposals will be required to make provision for the effective use of natural resources where applicable, including:

- *avoiding the development of the best and most versatile agricultural land, unless it is demonstrated to be the most sustainable choice from reasonable alternatives, by first using areas of poorer quality land in preference to that of a higher quality...*

The arguments above demonstrate that inclusion of the development site South of East Hanney in the Plan proposed by the Vale is:

- **NOT** consistent with the Vale’s own core policies;
- **NOT** justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives.

Therefore the plan is **“unsound”**.

Promoting Sustainable Transport and Accessibility

In the sustainability report, development of the site to the South of East Hanney was appraised by the Vale to bring about “*minor positive*” effects in terms that include the need to travel, and reducing road congestion.

I disagree with this assessment.

The A338 already suffers from serious congestion at peak times. It can be very difficult to pull out onto the A338 from the village roads. Traffic from the additional homes feeding on to the A338, both from the Grove and East Hanney development sites, will lead to significantly increased congestion along the A338.

The East Hanney development alone will attract a further 300 to 400 cars that will need to be accommodated.

All traffic from the site to the **South** will emerge on to the A338 whereas the original site proposed to the **East** of East Hanney allowed for emerging traffic to split either on to the Steventon Road towards the A34 or on to the A338 and helped to keep traffic away from the village roads that are already very busy.

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

With almost no employment in East Hanney, residents will be obliged to travel to a place of work elsewhere, adding to the congestion issues and creating green house gas emissions. It takes more than an hour to travel, via two consecutive bus routes, from East Hanney to Milton Park.

Consideration should perhaps be given to alternative sites nearer to the main centres of employment.

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*

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.*

The arguments above demonstrate that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- is **NOT** consistent with the Vale’s own core policies;
- is **NOT** justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives.

Therefore the plan is “**unsound**”.

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.

Landscape and Heritage

In the sustainability report, development of the site to the South of East Hanney was appraised by the Vale to bring about a “**major negative**” effect in terms of cultural heritage and providing a high quality landscape.

The Vale’s Core Policy 44 states:

The key features that contribute to the nature and quality of the Vale of White Horse District’s landscape will be protected from harmful development and where possible enhanced, in particular:

- *features such as trees, hedgerows, woodland, field boundaries, watercourses and water bodies*
- *areas or features of cultural and historic value*
- *tranquillity and the need to protect against intrusion from light pollution, noise, and motion*

Regarding the first bullet point above, my comments on Conservation and Improvement of Biodiversity in relation to Core Policies 44, 45 and 46 also apply here, but are not repeated in full. I feel it is totally unnecessary to destroy the ancient orchard and the ecological nature of the area around the Letcombe Brook when there are alternative, suitable sites available that would be far less damaging to the landscape.

Regarding the second bullet point above, the proposed site for modern development is adjacent to a conservation area. It is immediate to some of the many listed buildings and will have a detrimental effect on their appearance and outlook. Given the nature and density of the proposed development the character of the village will not be preserved.

The site holds some important archaeological artefacts including the ancient manor house of the village and a roman track/road. The opportunity for further exploration of these artefacts, and potentially others, will be lost. These artefacts should be protected.

Paragraph 17 of the NPPF describes a core principle to “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*” See also the Vale’s Core Policy 39: The Historic Environment.

There are alternative sites in the Vale without such associated history and important artefacts.

Regarding the third bullet point, the residents of East Hanney are proud of the rural nature of the area and we enjoy the tranquillity here. As Core Policy 44 states, we must protect the intrusion from light pollution, noise and motion.

East Hanney has a virtually no street lamps (there are none in the conservation areas) and there is a great deal of support for maintaining this policy and supporting the British Astronomical Association's Campaign for Dark Skies. We relish the relatively low levels of light pollution at the present - a new high density housing development is expected to have an unwelcome and significant negative impact on light, noise and motion.

The arguments above demonstrate that inclusion of the development site South of East Hanney in the Plan proposed by the Vale:

- is **Not** consistent with the Vale’s own core policies;
- is **Not** consistent with national policy, as required by the NPPF;
- is **Not** justified, as required by the NPPF, as this is not the most appropriate strategy when considered against the reasonable alternatives; and
- may suffer from emerging archaeological issues that could render the Plan undeliverable and therefore not “**effective**” as required by the NPPF.

Therefore the plan is “**unsound**”.

East Hanney – a “larger” village?

The development of 200 homes will overwhelm the nature and size of the existing village with a 60% increase in the total number of homes in East Hanney (334 homes in the 2011 Census). The imposition of a large, densely populated estate, upon a village lacking the necessary capacity, will blight our existing community, culture, quality of life and environment.

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 in the next few months returning the village to a “smaller” ranking and thus, under the Vale’s own criteria, not warranting any such development.

According to the 2011 Census, East Hanney had a population of 748 residents housed in 334 homes.

There are some points to note that lead us to question why the area to the South of East Hanney has been included as a strategic development site in the Local Plan 2031 Part 1.

- The only other village with population less than 2,000 earmarked for development is Milton which scores a relatively huge plus three in the sustainability assessment as opposed to minus two for East Hanney;
- East Hanney is the **ONLY** village with a “facilities score” lower than 15 earmarked for development;
- 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 1,007 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.

A principle of the Local Plan concerns availability of services. Development of the site South of East Hanney was appraised by the Vale to bring about “*minor positive*” effects in terms of availability of services and facilities. I disagree with this assessment.

Whilst the facilities score under the Vale’s assessment may suggest that East Hanney ranks as a “larger village”, this is a small community with limited services that are inadequate to support the huge proposed increase in residents. The points scored for having a “shop” do not take into account the nature of such a tiny facility staffed purely by community volunteers.

The housing designs and styles are anticipated to be out of character with the existing settlement at East Hanney and, with 25 homes per hectare proposed, so will the density. The current density for East Hanney, according to the 2011 Census, is less than one person per hectare.