

VALE OF WHITE HORSE LOCAL PLAN PART ONE: Strategic sites and Policies – Publication Stage REPRESENTATIONS BY OXALIS PLANNING ON BEHALF OF BARWOOD

Introduction

These representations have been prepared by Oxalis Planning on behalf of Barwood. Barwood have interests in land to the East of East Hanney – east of the A338 and south of Steventon Road.

Barwood wish to object to the Spatial Strategy which is considered to be unsound, and would encourage the District Council to review their decision not to allocate land to the east of East Hanney.

Whilst the Spatial Strategy for the District appears to have appropriate regard to the objectively assessed needs of the area, Barwood are aware of the significant housing needs that will be generated by the ongoing growth of the City of Oxford and the potential implications of this growth, in terms of potential un-met needs, on the housing requirements in Vale of White Horse.

The distribution of development set out in the Plan broadly follows a rational and sustainable approach to distribution having regard to the existing pattern of development in the area, however Barwood consider that the specific allocation of sites fails to respond appropriately to the evidence base. The Strategy is therefore not justified because it is not the most appropriate strategy when considered against the reasonable alternatives, based on the proportionate evidence available.

Barwood have two major concerns regarding the Spatial Strategy and in particular the proposals contained in Core Policy 4. These relate to:

1. The distribution of development and the opportunities for growth at East Hanney.
2. The approach to and justification of the allocation of land for housing in East Hanney.

In particular Barwood consider that the decision not to allocate land located to the east of East Hanney (as previously proposed in earlier stages of the Plan preparation process) is unsound. The evidence, including the Council's own evidence base, strongly supports Barwood's case that the land to the east of the village is the most sustainable location for growth in the village and is a suitable, viable and deliverable proposal.

Distribution of Development

Barwood broadly support the approach to the distribution of development set out in Core Policy 3 and 4. The settlement hierarchy follows an appropriate appraisal of existing settlements and Policy

4 seeks to distribute development having regard to this settlement hierarchy. Barwood support the strategic allocation of land for housing in East Hanney but consider that the village could support additional development and that land to the east of the village should be allocated.

East Hanney is not constrained by the Green Belt or by landscape designations such as an Area of Outstanding Natural Beauty. It therefore compares favourably to other locations in the District where these constraints exist. These include Abingdon, Radley and South Kennington which are located in the Green Belt, and Harwell Campus which is an Area of Outstanding Natural Beauty.

The NPPF is clear in giving these designations the highest status and it requires local planning authorities to have considered all available and suitable alternatives before utilising land in these areas. In this regard Barwood are not convinced that the Council have explored all sustainable alternatives before committing to the removal of land from the Green Belt.

Land east of East Hanney, which was proposed to be allocated in earlier stages of the Plan preparation, is clearly a suitable and sustainable location for growth which is not constrained by Green Belt or an Area of Outstanding Beauty designation.

Furthermore East Hanney compares well with other 'larger villages' where a greater level of growth is proposed. Radley, for example, has a similar level of services and facilities but has an allocation of 240 dwellings notwithstanding its location within the Green Belt.

The Allocation of Land in East Hanney

Land to the east of East Hanney was proposed to be allocated in previous stages of the Plan preparation process and the sustainability appraisal work and other assessment work concluded that the site is suitable for development and a sustainable location for growth. Following consultation on the Housing Delivery Update the Local Plan Part One now proposes to allocate land to the south of East Hanney and land to the east has been removed from the Plan.

Barwood strongly object to the removal of land to the east of East Hanney from the Local Plan Part One which they consider to be the most sustainable location for growth in East Hanney. Barwood consider that the process through which the allocation of land in East Hanney has been determined, is unsound, because the proposed allocation decision is not justified based on the evidence available and is not therefore the most appropriate decision based on reasonable alternatives. Barwood would encourage the Council to review their decision not to allocate land to the east of East Hanney.

The Council's reasons for the replacement of land east of East Hanney with land to the south are that land to the south is suggested to be better connected to the village and that the change is in response to public consultation. This appears to be a superficial decision not based on detailed scrutiny of the evidence, indeed the Council's own evidence base in the form of the Sustainability Appraisal work and the Landscape Capacity Study clearly point to the land to the east of the village being the most sustainable and appropriate location for development.

We have considered these issues in turn below and have set out the reasons why land to the east of East Hanney is a deliverable and sustainable location for development.

The suitability of land to the east of East Hanney

Land to the east of East Hanney is well located to connect to existing services and facilities and to appropriately integrate with the existing settlement. There is an existing direct and high quality pedestrian route which would link the site with the services and facilities and other parts of the village. This link runs along the Paddocks and then on a footpath link over the Letcombe Brook to the Memorial Hall and School.

Any new development which will form an extension to an existing settlement must be carefully designed to both respond to the character of the existing settlement and to integrate with it. This relates to layout, design and landscape and to connectivity through both pedestrian and cycle links, and vehicular movement.

Land to the east of East Hanney is no different and can be designed in a way which will ensure it integrates with and forms part of the existing settlement. This will include pedestrian and cycle links to ensure that the existing services and facilities are easily accessible. The existing facilities in the village are located broadly central to the villages of East and West Hanney and the land to the east of East Hanney is well placed to provide access to these facilities. The village's School, shop and community hall are all within 800m (a convenient walking distance from the site). Such a distance is clearly well within walking distance and is no impediment to connectivity or integration.

Whilst the site lies to the east of the A338 this should not prevent the full integration of development on this site into the village (see attached Summary Statement prepared by M-EC). Indeed the development of the site presents significant opportunities to address existing traffic concerns and there are a number of options available that would address this, and which are also likely to result in improvements to the local road and footpath network. For example, this could include improvements that will help to manage the speed of traffic flows through the village, with integrated and dedicated pedestrian and cycle crossing points. Work could also bring about environmental enhancements through landscape design and tree planting. The location of the site will help to ensure that traffic movement which results from new development does not detrimentally affect the minor roads within the village. Traffic flows from the site will utilise both the A338 and Steventon Road to access higher order centres, leisure and employment destinations with both roads providing direct access to the site.

The site is extremely well placed to benefit from and provide access to the existing public transport services that run along the A338. The site could also contribute towards the provision of enhanced cycle facilities in the area.

Initial environmental appraisal work has been undertaken by Barwood to assess the suitability of land east of East Hanney for development. This has considered landscape, ecology, heritage and drainage and other issues. Please see attached Summary Statement prepared by M-EC and EDP.

In relation to landscape, the work concludes that the site does not possess any existing features that could constrain development and that there are no landscape designations on the site or wider area. It considers that the site is visually well contained and with views into and across the site filtered by existing vegetation and field boundaries. The existing field boundary also provides a strong boundary screening the site from long-distance views.

There are currently no public rights of way across the site although there is a footpath adjacent to the southern boundary of the site. The appraisal work notes the opportunity to enhance public access as part of the development of the site, to improve the public access to open spaces and the countryside.

The District Council's Landscape Capacity Study produced in February 2014 together with the Additional Phase 1 Report produced in October 2014 provides strong evidence to support the allocation of land to the east of East Hanney.

The Landscape Capacity Study (February 2014) assesses a much larger area of land than that being promoted by Barwood (and previously proposed to be allocated by the Council) but it concludes that land to the east of East Hanney has a '*medium*' capacity to accommodate development and identifies a site that is closely aligned with the Barwood site as being suitable for development. It states

"housing in the north-east corner of the site has the potential to relate most strongly with East Hanney".

Whilst it identifies potential constraints to the development of land to the east this is balanced with opportunities to integrate development and address current problems. It recommends that new woodland planting could be provided to the east and south of new development to create a strong countryside edge. It also suggests that the character of the A338 *"could be altered to better suit passing traffic through the extended village"*.

The land available to support the development of land east of the village is extensive and whilst not all of the land is proposed for built development, it provides opportunities for significant landscape and other environmental benefits. This could include significant woodland planting as recommended in the Landscape Capacity Study, a new network of footpaths, allotments and community orchards, nature trails and trim trails. Indeed there are a range of opportunities which could be designed and integrated into a scheme for the site in liaison with the local community.

In landscape terms the land can be developed in a way which would result in less harm to the landscape than the land to the south of the village. The Additional Phase 1 Landscape Report published in October assesses land to the south of East Hanney and concludes that the site should NOT proceed to a Phase 2 assessment, and that the site is only suitable for *"very small-scale housing next to Summertown"*.

It finds that the wider site is

“highly prominent in views from the south”

and that the site forms

“part of an open landscape which contributes to maintaining the separate identity of Grove and East Hanney”.

It states that development

“would result in harm to the wider landscape, the settlement pattern and its landscape setting and in a visual impact on the southern approach to East Hanney”.

In relation to ecology the appraisal work has concluded that there are no features on site which should constrain development. Indeed having regard to the land available to support development in this location the work concludes that there is scope for significant new habitat creation as well as the retention and enhancement of existing features which together provide an opportunity to deliver a net overall enhancement to the biodiversity of the area.

The Council’s Sustainability Appraisal work identifies some significant constraints to the development of land to the south of East Hanney including in relation to extensive ecological constraints. In this regard the land to the south of the village is more ecologically sensitive.

In terms of heritage the Appraisal work concludes that this site is not constrained by heritage issues and would not harm the existing Conservation Area.

In relation to drainage and flood risk preliminary appraisal work has found that the site is not at risk from flooding and that an appropriate surface water drainage scheme could be provided which would ensure that run-off rates from the site are better than existing green field run-off rates. Capacity constraints at the existing local sewerage treatment works are known to be a local concern. However, Thames Water is obligated under the Water Industry Act to provide foul drainage capacity and so foul capacity is not an in-principle constraint to development. Furthermore a strategic allocation for around 200 homes on land east of East Hanney is sufficiently large to ensure that appropriate improvements to existing facilities are implemented and if necessary this could be ensured through the requisition of relevant infrastructure to help forward fund works. As well as meeting the needs of the development, this would also provide betterment for the village, through improvements to existing infrastructure.

Having regard to this evidence base, it is clear that land to the east of the village is suitable for development. There are no technical or environmental constraints to the development of the site and the land could be developed in a sustainable manner which would integrate with the existing settlement and contribute to its character and function. The land is available for development now with a willing landowner and developer and the assessment work demonstrates that the site is viable and is therefore deliverable.

Community Consultation

One of the reasons the Council have given for replacing the proposed allocation of land to the east with land to the south is the response from the local community. However there is no evidence to suggest that the local community have been presented with a clear choice of sites and asked to comment on their preferences, and therefore any analysis from earlier stages of consultation must be placed in context of that particular consultation stage and what was specifically consulted upon.

Following the publication of the Publication Draft Local Plan, we are aware that the Parish Council has consulted the local community to inform its response to the Local Plan. These views are reflected in the following resolution it made when Barwood met the Parish Council on the 10th December.

- “1. *The Parish Council, and the majority of residents, are firmly against a single 200 home development;*
2. *If they had to have some development, they would prefer smaller sites that can be easily integrated into the village;*
3. *If they are forced by the Planning Inspector to have a single allocation, the majority would prefer it to be on the East of East Hanney site, rather than the South of East Hanney site.*
4. *The issues they have concerns about the East of East Hanney site relate to:*
 - Sewerage infrastructure*
 - Risk of flooding*
 - How the site will integrate with the village given its location on the other side of the A338 (particularly given the planned developments in Grove and Wantage which would exacerbate congestion and traffic using the A338)*
5. *Any development should reflect the character of the village, its density and design.”*

A copy of the relevant correspondence with Parish Council is attached for reference.

It is understandable and expected that the preference would be to have no development allocated to the village. We also note the Parish Council's preference for smaller allocations of land on sites within the village and we agree that these could be brought forward through the Site Allocations DPD or a Neighbourhood Plan. However, there is not currently any evidence that any other sites within the settlement boundary could form a strategic allocation as part of the Local Plan Part One in accordance with the proposed Spatial Strategy.

Furthermore, it would not be a sustainable or sound approach to meeting the objectively assessed needs of the District if all of its growth requirements were proposed to be met by sites in and on the edge of its main towns. Indeed, taking constraints, including the Green Belt, into account, it would be impossible for the District's own significant housing requirements to be met in that way. That would not be a justified approach and the Local Plan would be unsound.

As set out above, East Hanney is a sustainable settlement, which is not affected by significant constraints, and as proposed in the Publication Draft Plan the village is an appropriate location for

strategic housing development to help meet the Districts significant and pressing housing needs. The local community's clear preference however, if a strategic allocation is made in the Local Plan, is that land to the east of the village (the Barwood site) should be allocated for development in preference to the land to the south of the village.

The concerns the Parish Council have raised regarding the land to the east of the village have been considered through the information set out above. The development of a larger site, east of the village, provides the opportunity to deliver a sustainable scheme that could bring with it a range of environmental, social and economic benefits. This could include the provision of significant new areas of publicly assessable open space, incorporating new woodland planting, areas for biodiversity enhancement and a network of new public footpaths. It could also include areas for community facilities such as community orchards or new allotments. As outlined above and in the M-EC Statement, the site could include highway works which would result in junction improvements with reduced vehicle speeds and priority for pedestrian and cycle crossings. M-EC also note that the scheme could forward fund improvements to the local sewerage works to cater for the demands from the site and also bring about betterment.

Barwood are also committed to working with the Parish and District Councils to ensure that the development of land to the east of the village, if brought forward, appropriately addresses the concerns raised by the local community and makes a positive contribution to the character and quality of the village, as well as helping to deliver the new homes needed in the area. Barwood will consult the Parish and District Councils at an early stage in the masterplanning and development process to ensure that the local community's views are properly considered.