

## Comment

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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Dr Paul Birkby
<b>Comment ID</b>	LPPub1142
<b>Response Date</b>	19/12/14 13:59
<b>Consultation Point</b>	Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area continued from previous page ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	Yes
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	South of East Hanney
If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)	
<b>Q3 Do you consider the Local Plan complies with the Duty to Co-operate?</b>	Yes

**Q4 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.**

The allocation of 200 houses to East Hanney is unjustified and the plan therefore unsound for the following reasons:

- 1 Paragraph 5.9 of the Local Plan lists the sites allocated for strategic growth in the Abingdon-on-Thames and Oxford Fringe Sub-Area. East Hanney is not listed. Therefore there is no justification given for allocating 200 houses to East Hanney.
- 2 In the 2011 census East Hanney had 334 properties. A 200 house development would represent an almost 60% increase in the size of the village. Placing 60% of a village in a single high density development cannot enhance the environment and is therefore against a number of the Core Policies and Strategic Objectives (eg SO3, SO11, CP37, CP39, CP44)
- 3 There are more than 10 villages that are both larger than East Hanney (by population) and score more than it in the facilities assessment that have not been allocated housing in Phase 1 of the Local Plan. There is no justification given for selecting East Hanney to have a 60% growth in size in terms for the number of houses.
- 4 East Hanney is prone to flooding and suffered major incidents in 2007 and 2014. The National Planning Policy Framework (Paragraph 101) states that: "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." The plan does not follow the NPPF because sites with a high risk of flooding have been included whilst areas with a low risk of flooding have not been allocated housing.
- 5 The plan has not provided any reasonable justification for building 200 houses in East Hanney. The evidence base provided does not support the building of 200 houses here, and therefore the plan is unjustified because it is not based on a robust and credible evidence base.
- 6 No suitable sites have been identified in East Hanney where the positives outweigh the negatives for developing that site.
- 7 The already very limited services in East Hanney, such as the volunteer run shop and the primary school, do not have any expansion capacity and therefore a significant increase in population for the village is more likely to reduce the quality of the services in the village than improve them. This is particularly the case since East Hanney does not have any infrastructure improvements specifically listed in the Infrastructure Delivery Plan.
- 8 A development in East Hanney will not reduce the need to travel or promote sustainable modes of transport (SO8, SO12, CP33, CP35) because travel is required for essential services, for leisure and for employment. In most cases these journey will be undertaken by car. The nature of the roads and the lack of dedicated cycle routes means that cycling is generally not a safe or suitable option.

**Q5 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 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.**

East Hanney should be classified as a smaller village and should only be considered for smaller, sustainable, well designed developments as part of phase 2, provided that necessary infrastructure changes are implemented before the housing is built.

**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.**

**Q6 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