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1st October 2015

The Planning Inspectorate
3/26 Hawk Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Attn. Mr Robert Wordsworth (e-mail: robert.wordsworth@pins.gsi.gov.uk)

Dear Sirs,

Hanborough Parish Council's Statement of Case re APP/D3125/W/15/3129767

Hanborough Parish Council (HPC) argues that the development proposed by the appellant (up to 169 dwellings and a GP surgery-cum-pharmacy in fields on the western edge of Long Hanborough) would have detrimental social and environmental impacts that outweigh the purported economic benefits. Indeed, HPC fears economic harm to residents (particularly in relation to time lost due to traffic congestion) and questions whether the appellant's case for profits to go towards maintenance of Blenheim Palace World Heritage Site has been made properly.

HPC is content to use the appellant's own analysis¹ of the reasons for West Oxfordshire District Council (WODC) turning down application 14/1234/P/OP; namely:

- a. The scale of development in its own right and with other schemes;*
- b. Failure to address the education and healthcare implications for the village;*
- c. Failure to take the opportunity to create a locally distinctive development;*
- d. The coalescence of the settlements of Long Hanborough and Freeland;*
- e. The precedent for further encroachment into the open countryside around the village;*
- f. The proposed development represents a disproportionate addition that will damage the social and environmental character and sustainability of the village;*
- g. Urbanise the road between the settlements of Long Hanborough and Freeland with inappropriate ribbon development.*

We shall comment on each of these acknowledged *“issues and constituent parts”* in turn.

The scale of development

The appellant disputes the context in which WODC considered the scale of the proposed development (refusal reason “a”) in its own right and with other schemes, and asserts that the evidence for the number of new homes required in West Oxfordshire *“has not been tested at Examination”* and hence *“should not be applied to constrain the Objectively Assessed Need.”*² However, the appellant’s complaint seems to HPC to be blunted by an admission that the appellant had not *“interrogated the housing supply listed within the Housing Land Position Statement”*³ at the time of applying. This complex technical issue will hopefully be settled by a judgement from the Planning Inspectorate (who are examining WODC’s *Local Plan 2031* as well as dealing with the appeal regarding application 14/1234/P/OP).

Failure to address the education implications

As recently as 9th September 2015, Oxfordshire’s Pupil Place Planning Manager wrote: *“Detailed feasibility studies to show how the school could expand on its existing site have not been conducted.”*⁴ Nevertheless, HPC has a member who was formerly a head teacher, an education officer and an advisor, and therefore feels qualified to comment on the feasibility of what has been proposed for the local primary school (or rather the lack of feasibility). In a nutshell, building new classrooms on the school’s sports/games field and replacing that field with another (250 metres away, accessed by road and unlikely to get planning permission) would create an educationally unacceptable dilemma: either lesson time or organised sport and informal games time would have to be sacrificed.

Failure to create a locally distinctive development

The appellant appears to have taken a desultory approach to the design of this development, presumably because the site is just *“an ordinary arable landscape scene with components that are readily available in the wider area”* and as such it lacks *“a coherent and aesthetically pleasing composition.”*⁵ The appellant predicts that the negative visual impact on this fragment of the Royal Hunting Forest of Wychwood grounds would be minor *“due to the level of receptors involved the occasional pedestrian/cyclist/house”* and *“those in cars on Witney Road”* who will see *“a flicker of a building before the existing vegetation hides the rest of the development from view.”*⁶ HPC is dismayed by how little the creation of a locally distinctive development seems to have mattered, especially since the appellant lists many of the relevant WODC planning policies.⁷

Coalescence of the settlements of Long Hanborough and Freeland

The appellant concedes that the gap between the proposed development and existing housing in Wroslyn Road, Freeland would only be about 270m and that views *“will be significantly changed from residential areas even if screened (a screen is not as valued as an arable countryside setting) and irreversible.”*⁸

Precedent for further encroachment

The proposed development as set out in application 14/1234/P/OP would have breached WODC's 'saved' policies BE2, BE4(a) and H7 of the adopted plan, H2 and OS1 of the emerging plan and paragraphs 14, 56, 64 and 66 of the NPPF, according to the Notice of Decision dated 6th March 2015. HPC believes it would have breached even more Local Plan 2031 policies; especially OS4, which stipulates that the character and quality of the surroundings should be enhanced and EH1, which requires proper measures (not just screens of hedging) to ameliorate injury to the landscape.

Disproportionate and damaging to social and environmental character and sustainability

The 2011 census found that Hanborough had a population of 2630 residents living in 1070 households. Since then, 48 new dwellings have been (or are in the process of being) built; 18 of these are affordable homes (occupied since the end of May 2015) on a rural exception site. This leaves 20 Hanborough residents hoping for a new affordable home to become available; although some of these might never qualify.⁹ Eighteen of another 50 dwellings, recently given outline planning permission for a site off Church Road, will also be affordable and exclusively available for Hanborough residents. Net housing growth over 5 or so years in the parish will be 95 (48 + 50 – 3 demolitions) or 9%.

Workable plans are in hand to accommodate this growth plus moderate 'windfall' growth. The appellant has only offered token solutions (with the exception of a new surgery-cum-pharmacy) for supporting 169 more dwellings. Unless practicable solutions to the concomitant demands on supporting infrastructure can be found, as required by emerging policy OS5, the damage to Hanborough's social and environmental character and sustainability would be severe. HPC considers the purportedly ameliorative measures advanced by the appellant to be superficial in relation to the provision of additional primary school places, transport and traffic.

Urbanisation of the road and inappropriate ribbon development

The appellant has offered the following comment on this drawback of the proposals: *"It is the nature of any greenfield development that it will have an 'urbanising effect' on a field that is not currently developed."*¹⁰ HPC sees this flippant remark as indicative of the appellant's paucity of respect for Hanborough's character; it misses the point about streetscape and substitutes a statement of the obvious about building on fields. We should now like to turn to discussing traffic and transport on the road in question (Witney Road is part of the A4095), even though they were not previously listed as reasons for refusal of application 14/1234/P/OP.

Traffic and transport

The appellant has been dismissive about likely traffic impact, first describing it as “modest” and later fudging the issue of whether it might be severe by saying “*there is no guidance which suggests that a ‘severe’ impact is in any way linked to proportional impact*” when it comes to assessing whether the traffic generated by a proposal would be sustainable.¹¹ The appellant’s consultants admit: “*The existing issue for Long Hanborough is that the A4095 is supporting significant volumes of through traffic from Witney at an overall rate of 1 vehicle every three seconds during the morning peak. As such any variance in flow will lead to wider perturbations and delay.*”¹² However, despite producing a vast amount of data, tables and graphs, the consultants did not reveal how many of 4% more vehicles per day would be concentrated in peak hours and thus disrupt traffic flow as they entered at a single junction.

Turning to public transport instead, the appellant has offered a modest short-term contribution to public transport, mainly aimed at the No. 233 and No.11 bus services; however, HPC has been warned informally¹³ that far from enhancing bus frequency, Stagecoach is almost certain to withdraw the No.11 completely, regardless of the prospect of contributions offered by developers. As for travel by train, one resident has described her peak hour journey as unsafe and uncomfortable, standing wedged in the carriage coupling and toilet areas. First Great Western say¹⁴ this should start improving from May 2017, when new trains will come into service, but no funds have been allocated to lengthening the platform at Hanborough Station (so it will be difficult to access the promised extra capacity).

Conclusion

HPC contends that the appellant failed to design a locally distinctive development and to avoid urbanisation and coalescence with Freeland. 169 extra dwellings would not represent a proportionate addition to Long Hanborough and would damage the social and environmental character and sustainability of the parish. For all these reasons, as set out above and to be expanded upon in our Proof of Evidence, HPC respectfully asks for the appeal to be turned down.

Yours truly,

Cllr. Niels Chapman
(On behalf of Hanborough Parish Council)

References in HPC's Statement of Case re APP/D3125/W/15/3129767

1. Planning Statement for Pye Homes Ltd., prepared by West Waddy ADP LLP, July 2015, Section 4.3, page 14.
2. Ibid. Section 6.10, page 18.
3. Ibid. Section 6.12, page 19.
4. Oxfordshire County Council's response to application 15/02687/OUT (an updated version of application 14/1234/P/OP), prepared by Barbara Chillman, Pupil Place Planning Manager, 9th September 2015, *Education*, page 12.
5. Landscape and Visual Impact Assessment, prepared by Tim Lynch Associates, August 2014, Section 3.9, page 26.*
6. Ibid. Section 8.31, page 40.
7. Ibid. Section 2.2, pages 12-17.
8. Ibid. Section 8.1.5, page 46.
9. Planning and Strategic Housing, e-mail to Niels Chapman from Ffyona MacEwan (Housing Enabling Manager), 18th September 2015.
10. Planning Statement for Pye homes Ltd., prepared by West Waddy ADP LLP, July 2015, Section 7.12, page 26.
11. Letter to Mrs H Wiseman, a WODC Senior Planner, from West Waddy ADP LLP, 17th February 2015, section on *Traffic Impact*.
12. Transport Assessment for Pye homes Ltd., prepared by David Tucker Associates, 8th July 2015, Section 6.1, page 27.
13. Nick Small, Strategic Development Manager for Stagecoach (Midlands, Oxfordshire and West), over telephone on 16th July 2015.
14. Tom Pierpoint, Regional Development Manager for First Great Western, via e-mail to Niels Chapman on 13th August 2015.

Other documents likely to be cited in HPC's Proof of Evidence:

15. School planning for housing growth in Oxfordshire, e-mail to Niels Chapman from Barbara Chillman, 12/01/15.
16. Rt. Hon. David Cameron MP's letter of 11/02/15 to Cllr Ian Hudspeth.
17. Cllr Ian Hudspeth's letter dated 05/03/15 replying to David Cameron.
18. Highways Engineer's comment, e-mail to Niels Chapman from Geoff Arnold, 06/02/15; and statement to Planning Committee, 02/03/15.
19. Technical Note, prepared by Mode Transport Planning, 19/01/15.
20. Hanborough Parish Council's objection to application 14/1234/P/OP, prepared by Edgars Ltd., 26th September 2014.*
21. Late submissions by the appellant in relation to application 15/02687/OUT*

*Documents expected to be in core pack and therefore not reproduced by HPC.