

## Local Plan 2031 Part 2

Publication Version  
Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

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	Cathy	
Last Name	Harrison	
Job Title (where relevant)	Planning Advisor	
Organisation representing (where relevant)	Environment Agency	
Address Line 1	Red Kite House	
Address Line 2	Howbery Park	
Address Line 3	Benson Lane	
Postal Town	Crowmarsh Gifford	
Post Code	OX10 9NR	
Telephone Number	0203 025 9601	
Email Address	Planning_THM@environment-agency.gov.uk	

## Part B – Please use a separate sheet for each representation

Name or organisation: Environment Agency

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

4a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

This policy identifies the proposed allocation of 90 dwellings on Land south-east of Marcham. The Water Cycle Study (WCS) has not clearly set out which site is going to which Sewage Treatment Works (STW). The South East of Marcham site (of 120 houses in LPP2) is within the Appleton STW catchment so this site would likely be connecting to Appleton. As it stands no assessment has been made to determine if the growth at Appleton STW will result in non-compliance with the objectives of the Water Framework Directive. Therefore the allocation of this site is not based on sound and robust evidence and cannot be justified. Without this assessment there is doubt whether the amount of dwellings at this site is deliverable and so there are issues with the effectiveness of the plan.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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 WCS states that no assessment has been made as 'there is no discharge or permit limit and also no upstream monitoring data for Appleton WwTW.'  
However we have provided historical effluent data and guidance on the upstream quality assumptions in the absence of observed data. Therefore an assessment should now be possible which would address the soundness issues.

(Continue on page 4 /expand box if necessary)

**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:

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Signature:

Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan

☐

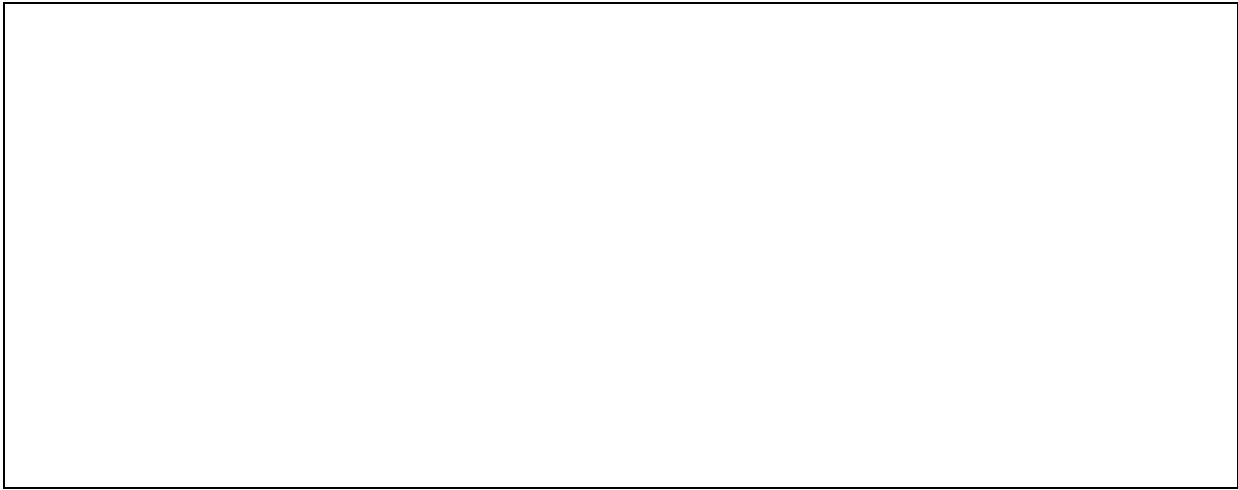
I would like to be added to the database to receive general planning updates

☐

Please do not contact me again

☐

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**



**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

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## Part B – Please use a separate sheet for each representation

Name or organisation: Environment Agency

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

12a

Policies Map

Page 33

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

x

4. (3) Complies with the Duty to Cooperate

Yes

No

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We are concerned that land is being safeguarded within Flood Zones 2 and 3 without any evidence that a Sequential Test or Level 2 Strategic Flood Risk Assessment (SFRA) having been undertaken. We would find this safeguarding as 'unsound' without this evidence. This applies to Land Safeguarded for Marcham bypass.

(Continue on page 4 /expand box if necessary)

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We do not feel that it is appropriate to safeguard land in Flood Zones 2 and 3 without a Sequential Test and Level 2 SFRA provided as evidence. We feel that without this evidence, any future assessment of flood risk may be prejudiced by the land that has been safeguarded.

(Continue on page 4 /expand box if necessary)

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Signature:

Date:

22 November 2017

## Part B – Please use a separate sheet for each representation

Name or organisation: Environment Agency

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

18a

Policies Map

Page 37

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

x

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

We understand that this policy updates the area shown by the Adopted Policies Map and Appendix B for the Culham to Didcot Thames River Crossing.

We are concerned that more land is being safeguarded within Flood Zones 2 and 3 without any evidence that a Sequential Test or Level 2 Strategic Flood Risk Assessment (SFRA) having been undertaken. We would find this safeguarding as 'unsound' without this evidence.

(Continue on page 4 /expand box if necessary)

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We do not feel that it is appropriate to safeguard land in Flood Zones 2 and 3 without a Sequential Test and Level 2 SFRA provided as evidence. We feel that without this evidence, any future assessment of flood risk may be prejudiced by the land that has been safeguarded.

(Continue on page 4 /expand box if necessary)

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22 November 2017

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Paragraph

Policy

19a

Policies Map

Page 36

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

x

4. (3) Complies with the Duty to Cooperate

Yes

☐

No

☐

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We understand that this policy updates the area shown by the Adopted Policies Map and Appendix B for Grove Station. The proposed location is significantly different. We are concerned that land is being safeguarded within Flood Zone 2 without any evidence that a Sequential Test or Level 2 Strategic Flood Risk Assessment (SFRA) having been undertaken.

(Continue on page 4 /expand box if necessary)

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We do not feel that it is appropriate to safeguard land in Flood Zone 2 without a Sequential Test and Level 2 SFRA provided as evidence. We feel that without this evidence, any future assessment of flood risk may be prejudiced by the land that has been safeguarded.

(Continue on page 4 /expand box if necessary)

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22 November 2017

## Part B – Please use a separate sheet for each representation

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3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

30

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

x

No

4. (3) Complies with the Duty to Cooperate

Yes

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We support this policy and associated text. We suggest the following minor wording changes.

Paragraph 3.2.36 Main rivers are defined as those present on the main river map for England and insert the following hyperlink:

<https://www.gov.uk/government/collections/main-river-map-for-england-proposed->

[changes-and-decisions](#). We also suggest that the following wording is added to ordinary watercourses (headwaters and smaller brooks and streams **and ditches**). All types of watercourse and **their corridors** have a part to play in enhancing biodiversity across the district.

Paragraph 3.2.42 In line with these Part 1 policies, Part 2 sets out Development Policy **30: Watercourses**

Proposals should consider how access to watercourses can be improved for all users (**depending on biodiversity sensitivities**) including provision for those with mobility impairments.

Paragraph 3.2.44 We suggest adding that if the watercourse flows through a development, rather than being adjacent to or on the boundary) then there should be a buffer zone on both sides of the watercourse.

Development Policy 30: Watercourses

We suggest the following addition: Plans for development adjacent to or encompassing a watercourse should include a minimum 10m **undeveloped** buffer zone along both sides of the watercourse.

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22 November 2017