



**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](mailto: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

Mr

First Name

anthony

Last Name

watson

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

hansteads

Line 2

The green

Line 3

East hanney

Line 4

wantage

Post Code

OX12 0HQ

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	<input type="text" value="all"/>	Policy	<input type="text" value="CP42"/>	Proposals Map	<input type="text" value="East Hanney housing site allocation"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No X"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No X"/>

*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.

The VWHDC plan to develop to the South of East Hanney runs directly counter to its own CP42 which seeks to ensure that development provides appropriate measures for the management of surface water as an essential element of reducing future flood risk to both the site and its surroundings. CP42 states that "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."

The proposed site South of East Hanney is upstream of the mill on Letcombe Brook and the development of additional dwellings will clearly result in an increase in the volume of water (including both run-off and water processed from the sewerage works) being pumped into the brook, and subsequently passing through the existing settlement.

The Plan lacks any solution to management of the elevated water volumes which means the risk of water flowing into the lower fields, and flooding on to the streets of the village, will be increased significantly. The East Hanney area is demonstrably prone to regular flooding and the existing village has experienced significant and damaging floods in 2007 and 2014. In addition, according to the Environment Agency's "Areas Susceptible to Ground Water Flooding" map, **all** of East Hanney is already at the highest risk of groundwater emergence. This means that development on the site South of East Hanney under current proposals will clearly increase flood risk to the whole of the existing settlement.

Moreover, the sewage works for the area are currently at full capacity, giving rise to frequent sewage issues and failures (eg 2014 when Thames Water had to close the sewage treatment system for 48 hours due to volume of waste water exceeding their resources). The proposed development represents a near doubling of sewage generated from East Hanney. Without significant investment into the upgrade of the sewage works, in advance of development, there will be even greater lack of capacity to manage the increased levels of sewage from the new homes, not only at East Hanney but also those at Grove. A higher risk of exposure to sewage problems for villagers would be inevitable. Indeed, Thames Water have been open in stating that they do not have the capacity or plans in place to be able to cope and that it will take many years for them to be able to address the need.

In addition to running counter to its own Core Policy statements, the VWHDC plan for East Hanney housing development also flies in the face of the National Planning Policy Framework. 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”*. Paragraph 103 of the NPPF states that local planning authorities should *“ensure flood risk is not increased”*.

In summary, the plan to develop to the south of East Hanney is not compliant as it is inconsistent with the VWHDC’s own core policies, runs counter to NPPF national policy, and shows a complete lack of regard for the knowledge and experience of both the Environment Agency and Thames Water, who are clearly authorities with regard to flooding and sewerage risks. It is therefore unsound.

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 best option would be to site the proposed development in an alternative location altogether, where the obvious increase in flood risk is not present. If it must be at East Hanney then a reversion to the site to the East of the village would be preferable.

## 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

all

Policy

CP4

Proposals Map

East Hanney housing  
site allocation

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

No X

4.(2) Sound (Positively Prepared,  
Effective and Justified)

Yes

☐

No

No X

4 (3) Complies with the Duty to co-  
operate

Yes

☐

No

No X

*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.

The VWHDC began a consultation process in Spring 2014 with regard to possible housing development in the East Hanney area. This consultation was in regard to possible development to the East of the village. It is claimed that Villagers preferred the option of development to the South, but there is no evidence to support this. It seems likely The VWHDC was influenced by the views of the owner of land to the South and perhaps his associates and/or agents. Clearly, this landowner stands to gain financially from the switch from East to South of the village as the proposed development site.

The switch, sometime after the consultation period, to the site South of East Hanney appears to the residents to be unexplained, unsubstantiated, unsupported and illogical. This alternative site has not been the subject of any meaningful resident consultation or consideration.

The National Planning Policy Framework requires the Plan to be prepared “in accordance with legal and procedural requirements” which, in relation to the new Plan for South of East Hanney, is clearly not the case. The consultation process was severely flawed in execution, not compliant with the NPPF, takes no heed of the views of village residents, and is thus unsound.

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.

**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

**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:

**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:

18 Dec. 14