



**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 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	Stewart	
Last Name	Scott	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	The Hanneys Flood Group	
Address Line 1	Cross Tree House	
Line 2	The Green	
Line 3	East Hanney	
Line 4	Oxfordshire	
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"/>	Policy	CP 4	Proposals Map	Land South of East Hanney
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4. Do you consider the Local Plan is :

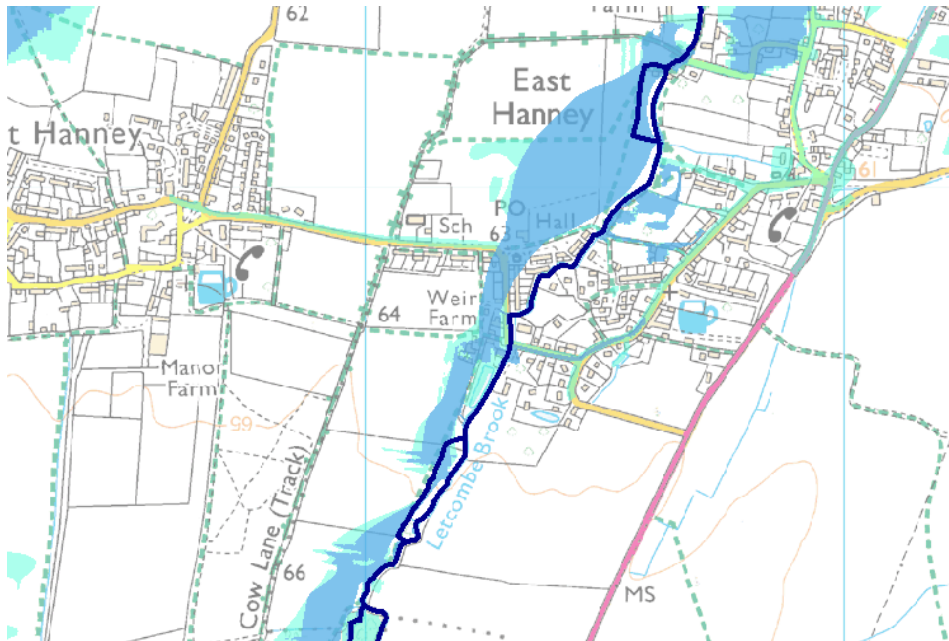
4.(1) Legally compliant	Yes	<input type="text" value="yes"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="No"/>

Please mark as appropriate.

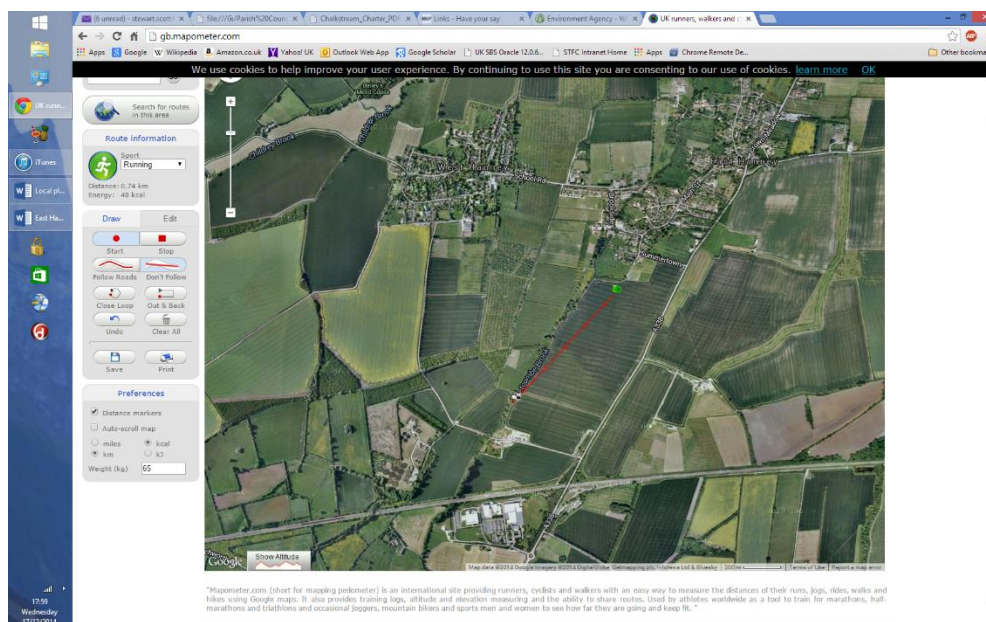
5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

I believe that the allocation of 200 houses on 8.2ha on land South of East Hanney is unsound for the following reasons.

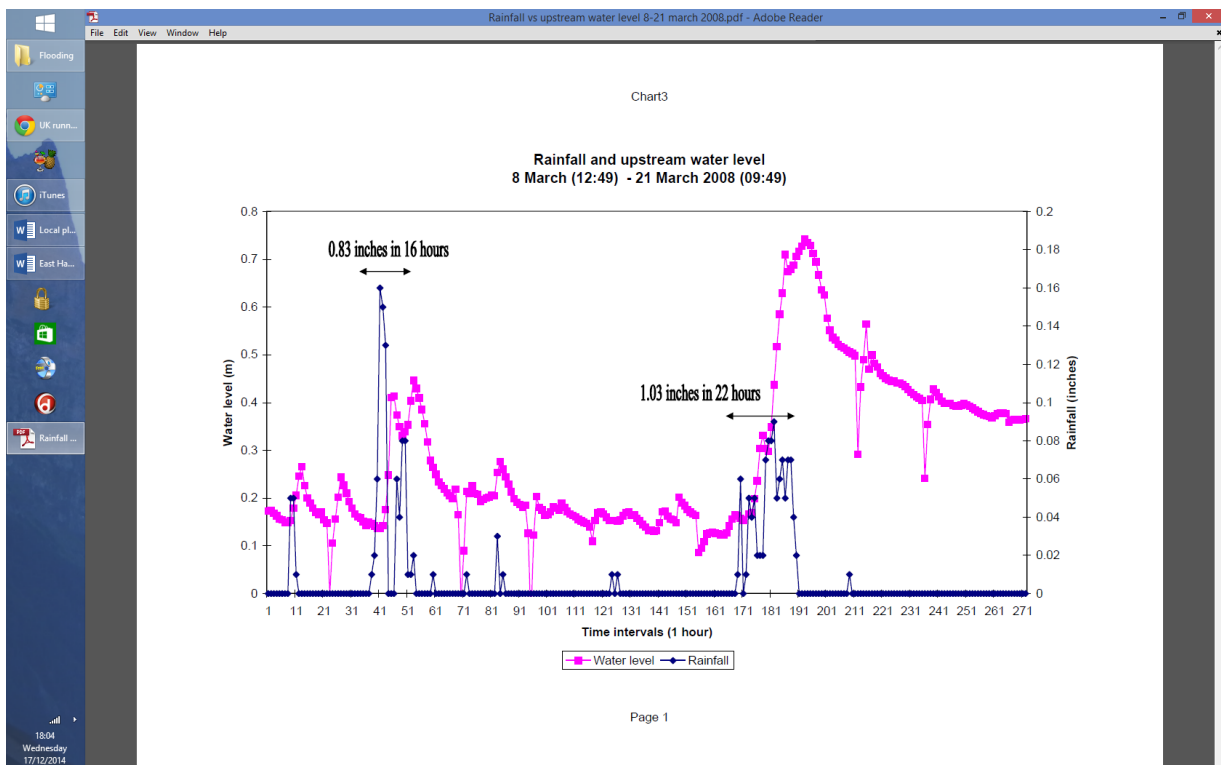
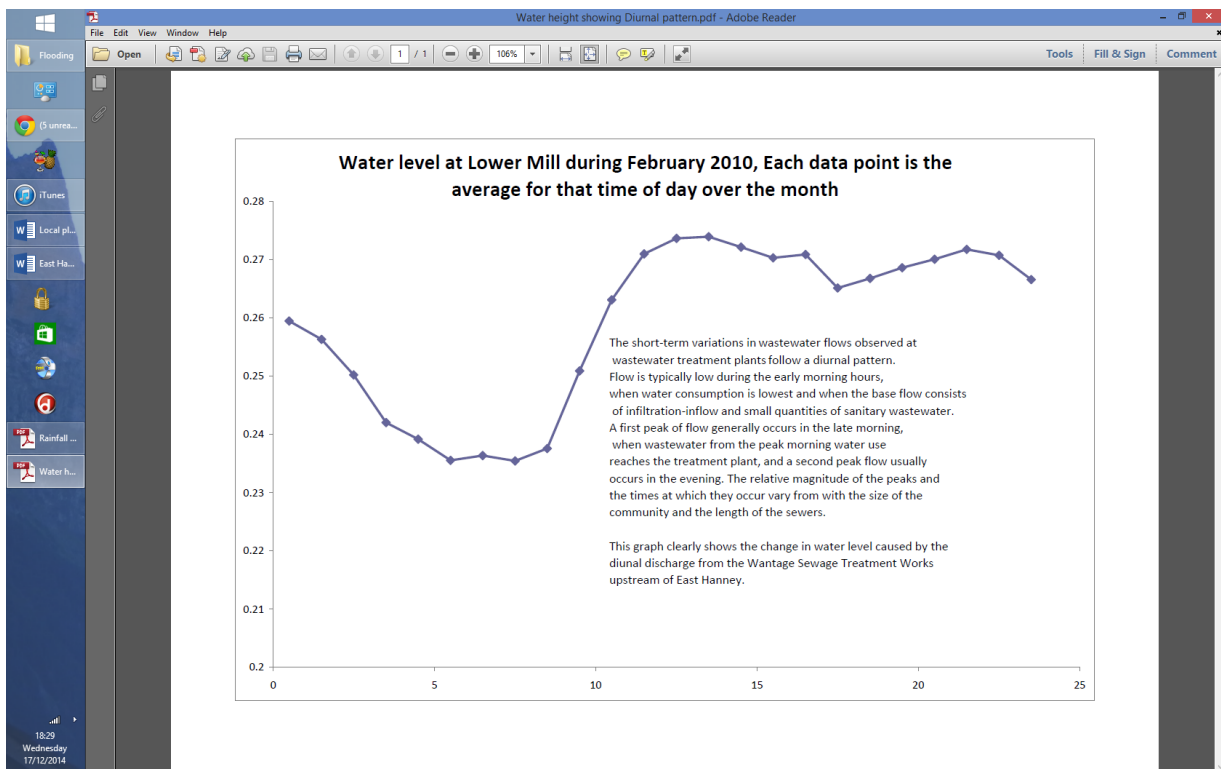
1. The EA flood risk map is known to be inaccurate. The map shows some properties which are in flood zone 2 and 3 yet are situated many meters above flood levels experienced in 2007 and recently in 2014. It therefore cannot be assumed that the proposed site is not shown at flood risk on the basis of this map. It is essential that more accurate surveying of the plot and the village needs to be performed with much greater spatial and height resolution to give accurate modelling results.



2. East Hanney is a village with very shallow gradients and the Letcombe brook is higher than many properties within the village. The bank heights are very low and even small increases in volumetric flow can cause overtopping and flooding of properties. The additional housing proposed and that of the additional housing in Wantage and Grove will discharge sewage to the Wantage Sewage Treatment plant which is 750m upstream of the site. The additional discharge into the Letcombe brook will increase flows and increase flood risk to many properties within the village. Claims that the discharge rates are small compared to normal flows are not true as we see this evidence on our water height data logger.



3. The proposed site is not provided with the required infrastructure. As well as flooding, the village also suffers from poor sewage infrastructure. Thames Water have identified this in recent planning applications yet planning is still allowed on the assumption that this will be provided. An increased sewage infrastructure will be required locally for 200 houses and with major developments on the other sites in Wantage and Grove will mean that the Wantage Sewage Treatment Works will need to be upgraded. Thames Water operate on a rolling 5 year plan and there are currently no plans agreed with Thames Water. This is likely to mean that housing will be built in advance of the sewage infrastructure being available. East Hanney is down stream of the outfall from the sewage works. Legally Thames Water can discharge untreated water into the brook in times of high rainfall, until the sewage treatment works capacity is increased East Hanney is again at risk of flooding because of the additional discharge from the treatment works.
4. The water height in the brook responds very rapidly to rainfall. The attached graph shows water height at Lower Mill and rainfall. This shows that we can have no warning of flooding unlike towns like Abingdon and Oxford where river levels rise some 2-3 days after a high rainfall event. The village is at much greater risk because of the sudden nature of the water level rise.
5. There is a great fear of flooding by many residents in East Hanney. Construction of 200 houses close to the stream and upstream will add substantially to their fears even if modelling shows that there is no increase in flood risk. The increased health risks due to this fear should not be underestimated.
6. Many of the roads in and around East Hanney become impassable during a flooding event with roads often being closed by the police. Construction of 200 houses in a village where roads are closed because of flooding does not seem logical.



I believe that the Local Plan has failed in its duty to co-operate.

The Local Plan originally indicated land to the East of East Hanney. At the public meeting which I attended there was overwhelming objection to a single site of 200 houses, but there was support for smaller developments within the village.

The Vale did not engage in any more public consultation and changed sites to the South of East Hanney. There was no advance warning to the public, no leaflets, no information on the Vale's web site, no exhibitions. In fact the recent Vale News which is distributed by email on 3rd October there was no mention of the Local Plan at all.

It was stated that the Vale would set out the reasons for this change based upon evidence and public consultation. There was NO public consultation on the proposal to change from the East to the South.

Many members of the flood group have given up trying to comment on the Local Plan because the online form is too complicated and unclear. The download form is difficult to use, the form is made up of tables which are hidden and comments which go beyond the box confines are lost to view. The Vale web site claims that letters cannot be accepted but we have members where letters they have been returned saying they are unacceptable.

Many East Hanney residents, including the Hanneys Flood Group, have helped prepare a community response which has been submitted by the Parish Council. I ask that this is given sufficient consideration as a well researched document from the community.

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 strategic Housing allocation of 200 houses on land to the South of East Hanney should be removed.

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

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:

I am available to provide additional data and information on flooding within East Hanney if the inspector requires

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:

17 Dec 2014