

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

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 & Mr	
First Name	Amanda & Stephen	
Last Name	Clarke	
Job Title (where relevant)		
Organisation representing (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

Sharing your details: please see page 3

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

1-16

Policy

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

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.

The plan is unsound in that the objectively assessed need is exceeded by a material margin. Parts 1 & 2 of the Local Plan are required to provide for an objectively assessed need of 22,760 homes. In fact, they together provide for 24,720. This represents an over-provision of 1,940 homes. By imposing additional allocations in this Plan period, the Plan fails to recognise that supporting infrastructure will not be developed in a timely fashion, bringing the sustainability of proposed development into question.

(Continue on page 4 /expand box if necessary)

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 Plan should be modified to reduce the number of homes proposed to be developed within the plan period. In particular, sites which pose the highest flood risk should be removed from the Plan; these include the site south of Marcham and the two sites at East Hanney.

(Continue on page 4 /expand box if necessary)

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

2.47
3.115

Policy

35

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.

The Plan is unsound. The evidence base does not support the statement in Para 2.47 that East Hanney offers a good range of services and is relatively unconstrained. Further, the Plan, in promoting the two sites at East Hanney is not compliant with the NPPF in that this development is not located where need to travel will be minimised and the use of sustainable transport modes can be maximised.

The village offers a Primary School that is already at capacity and which sits on a small site on which extensive development is not possible. Existing proposals for an extension are unfunded and the Plan makes no suggestion as to how funding is to be provided. Further, extension of the Primary age provision on the site risks the displacement of pre-school provision, for which no other suitable premises are available. There is no Secondary school provision within the village.

Although the two sites at East Hanney are cited as capable of allowing timely development (i.e. ahead of larger sites within the Local Plan area), this would not represent sustainable development if no school places are available until schools allocated to larger sites have been built and are up and running. Development of housing in advance of supporting infrastructure is not sustainable.

For Primary age children, bussing (or the use of private cars) to schools in other settlements is the only alternative.

3.109 - It is important to note that the nearest medical provision for the villages of East and West Hanney is at Wantage (the G.P. practice at Grove has closed). That represents a journey

of at least 3 miles. There is no footpath or cycle route suitable for this journey, so private transport or the limited bus service represent the only alternatives. Experience shows that the private car is used. No evidence has been adduced to show how this site promotes Core Policy 35 – Promoting Public Transport, Cycling and Walking.

East and West Hanney offer no material employment opportunities. There is no bus service to Didcot or Harwell, the closest employment centres.

(Continue on page 4 /expand box if necessary)

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 two sites allocated for development at East Hanney should be removed from the Plan.

(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:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

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

Appendix
A s. 4

Policy

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.

Appendix A Section 4 sets out the templates for development at each of the two sites at East Hanney. We fully support the objections raised by and amendments suggested by East Hanney Parish Council in respect of these, in particular as to East Hanney not being a larger village.

We would add the following specific points:

1. In respect of the site North of East Hanney, the template is inconsistent with the Vale's own Development Policies. The template specifies a "sufficient buffer zone" to the existing water course that runs along the east of the site. Development Policy 30 states, "The extent of the buffer is dependent on the size and nature of the development, but it should be a minimum of 10 metres wide, measured from the top of each bank." That general policy is qualified by the statement, "where a 10 m wide buffer zone is not considered possible by the local planning authority (for example in dense urban areas where existing development comes closer to the watercourse), a smaller buffer zone may be allowed, but should still be accompanied by detailed plans to show how the land will be managed to promote biodiversity, and how maintenance access to the watercourse will be created."

This site is greenfield and there is no existing development closer to the watercourse. The 10m buffer zone should be required.

Development Policy 30 also states, "Watercourses should be designed into the development to create a safe space, overlooked by, and where possible, fronted by, dwellings or other buildings, and forming an attractive part of the development with a

positive impact on the visual amenity and character of the settlement." This requirement should be applied to the site north of East Hanney.

2. There is a read-across from the requirement under Development Policy 30 (to preserve the watercourse to the east of the site to the north of East Hanney) to the environmental health condition set out in the site template concerning road noise. Any barrier put in place to reduce acoustic nuisance must be sensitive to the proximity of the watercourse and its maintenance requirements.
3. The template imposes a requirement to "upgrade the sewer network". Other recent developments adjacent to the A338 in East Hanney have attempted to deal with the inadequacy of the waste water / sewer provision by building holding tanks within the development and arranging for those tanks to be pumped into the main sewer at times when there is capacity for that to be done. In practice, there has, on many occasions, not been adequate capacity within the main sewer to accommodate sewerage from those developments and, as a result, sewage has backed up into the dwellings dependent on the storage system. Thames Water has, on various occasions, had to provide tankers to pump out the holding tanks.

No development on this site should be permitted until the main sewer serving East Hanney has been upgraded by Thames Water so as to avoid the requirement for holding tanks or other stop-gap measures.

4. It is not appropriate to set as an objective for the site to the north of East Hanney the delivery of an "urban extension". If the site is to be developed, the objective should be to provide a low density village extension, in the style of other housing on Ashfields Lane. In particular, the character of the development should not draw for reference upon the high density and inappropriate style of developments along the eastern side of the A338.

(Continue on page 4 /expand box if necessary)

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.

See suggestions incorporated into comments above.

(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.

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

Appendix
A s.4

Policy

NPPF

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.

The NPPF emphasises the active role Local Planning Authorities (LPAs) should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. VOWH DC should apply the sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding from all sources is lowest, taking account of climate change and the vulnerability of future users to flood risk.

The Strategic Flood Risk Assessment prepared by AECOM states that each of the sites at East Hanney lies within an area at highest risk of groundwater flooding. A significant part of the site to the north of East Hanney is at medium risk of surface water flooding. The A338 at East Hanney has a documented history of serious flooding as demonstrated by the Parish Council in its representations, which we endorse.

Given that there is acknowledged capacity for development of additional homes at alternative sites within the Vale, particularly at Dalton Barracks and to the North West of Grove, which are at significantly lower risk of flooding (and which, incidentally, meet the requirement of Policy 30 concerning Transport) the Vale has not applied the sequential approach to the selection of sites mandated by the NPPF and the Plan is therefore unsound.

(Continue on page 4 /expand box if necessary)

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.

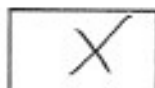
The sites at East Hanney should be removed from the Plan.

(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:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

22 Nov. 2017

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

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:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

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

Please return this form 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