



**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	Camilla	
Last Name	Symes	
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

Policy

4a

Policies Map

Site allocation  
number 4

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

4. (1) Legally compliant

Yes

X

4. (2) Sound

Yes

No

X

4. (3) Compiles with the Duty to Cooperate

Yes

No

X

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.

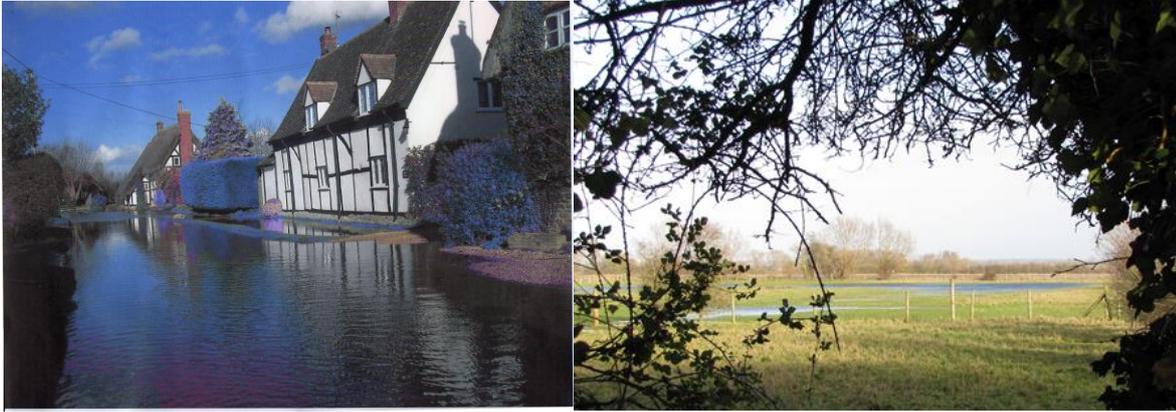
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

### Regarding the Soundness of the Local Plan and the Duty to Cooperate:

#### Concerns about the soundness of the Local Plan.

The Local Plan Part 2 has removed the Zone 2 flood risk classification for the paddock North of Ashfields Lane, East Hanney (site number 4 under policy 4a), and in fact, for all areas in and around East Hanney. The new Zone 1 classification means that according to the Environment Agency this land has a less than 1 in 1000 probability of annual flooding. This contradicts the Environmental Agency Floods Review July 2007, the Local Plan Part 1 in 2014 (Fig 1,2) and the Vale of White Horse District Council commissioned strategic flood risk assessment in 2013 and resultant study, all of which give the paddock North of Ashfields Lane a Zone 2 flood risk classification.

It is not only the professionals who can confirm the need for a Zone 2 classification. The residents of Ashfields and Ebbes lanes have seen significant flooding at the corner of Ebbes Lane and in the paddock North of Ashfields Lane currently designated for development, in 2008, 2012 and 2014. Below are pictures taken at the time of the most recent flood in January/February 2014. They show the flood water in Ebbes Lane (left) and in the paddock (right) at that time.



In the right hand picture it is easy to see the flooding from Letcombe Brook on the far side of the fence. This is the site North of Ashfields Lane which has been identified for development in the Local Plan Part 2. (Local residents also have similar photographic evidence of a more severe flood in 2008).

The comprehensive flood information supplied in the East Hanney Parish Council Response to the Vale of White Horse District Council local Plan Part 2 Consultation in May 2017, states (in summary) that: *“It should also be remembered that East Hanney is subject to regular and extensive flooding. As a result opportunity for development is highly restricted. The flooding that East Hanney receives is violent and extensive. Further detail is provided in section 5. As a consequence of the extent of flooding and flood risk there is very little land within the village not subject to flood which has not already been developed. The 2 sites proposed as strategic sites are both in areas of flooding and are recorded as such.”*

I am perplexed that despite all this evidence, the Local Plan Part 2 is based on a Zone 1 flood risk classification. This means that, according to the Environment Agency, this land has a less than 1 in 1000 probability of annual river flooding! Is it possible that the Environmental Agency re-classified the field out of Zone 2 and into Zone 1 because of a failure of the reporting and flood investigation system or a data entry error by the Environmental Agency when the national flood maps were put together? The new map and plan contradict the facts on the ground and the Environmental Agency’s own 2013 report. Surely the data should be thoroughly checked and cleaned if such an anomaly comes up, before family homes are built on a piece of land?

Not only would such a development North of Ashfields Lane put the families in the new homes at risk. In a delegated report attributed to the Local Plan Policy DC9 and NPPF (p16/v1778/FUL in 6.51) it is stated that **any development should not result in flood the risk being increased elsewhere**. Ebbes Lane is the lowest point in East Hanney village and according to Google Earth it is the same height as the site proposed for development North of Ashfields Lane. The field in question has always been a sink, absorbing water in an area with an extremely high water table. It is currently the place where excess water is pumped out of Ebbes lane to save those dwellings when there is a flood. Where else will the flood water go if the proposed development goes ahead? The homes on Ebbes lane, (some of which date from the 1600s), are not built on piles or raised on platforms. What will happen to them when the water can no longer be pumped out onto the field in question? Surely the Vale Planning team have a duty of care to the families in Ebbes Lane and Ashfields Lane whose homes will be at significantly increased risk of regular flooding by the loss of this sink?

When I raised this question with members of the Vale the planning team at the exhibition and public meeting on Monday 6 November (at the Abingdon and Witney College), I was told that the decision had been made on the basis of data and the “expert” opinion of the Environmental Agency. Surely this assumption should be thoroughly checked and verified before the decision is made to allow development on the site?

In addition, a further area of concern is that according to the Vale’s own Strategic Flood Risk Assessment of July 2013, the Thames water sewage treatment plant which drains treated water into Letcombe Brook has no holding system for treated water and therefore an increased volume of sewage for treatment will automatically result in an increased flow of treated water into Letcombe brook because, to quote the report, “what goes in must come out”. Presumably, the 80 new dwellings on this sensitive piece of land in addition to the more than 200 already delivered and the 100 already approved for development in Dews Meadow, Summertown and the garden nursery on the Steventon Road, will massively increase pressure on an already flood sensitive river?

In conclusion, I believe the decision to include the site North of Ashfields Lane in Part 2 of the Local Plan and allow planning applications to go ahead on a piece of land that is so obviously not appropriate for development, suggests a potential failure of due diligence and abdication of the District Council’s duty of care to future and present residents of the village of East Hanney. The decision seems to be based on an over reliance on what may well be faulty data from the Environment Agency. It directly contradicts the comprehensive Parish Council representation, local knowledge, previous risk assessments and historical information. If not reviewed, I believe that the Vale planning team may fail in their duty to ensure that *“The plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”*.

### **Traffic congestion 338 and Main Street East Hanney**

A further concern about the soundness of the Local Plan Part 2 concerns traffic congestion in East Hanney. The village shop/post office, school and playing fields are more than 1 mile from the proposed developments of 80 houses North of Ashfields Lane and 50 on the Steventon Road. In order to get to the village amenities the residents will have to use the A338 and cross the single lane bridge and narrow lane at Mill Orchard. There is already significant congestion on Main Street. The addition of 130 new households to the village will significantly increase congestion on the 338 and bring traffic through the village to a standstill.

(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.

On the basis of the information given in section 5 above, I strongly object to the Local Plan Part 2 proposal to include 80 new dwellings on the field North of Ashfields lane and suggest this unsuitable site should be removed from the plan.

**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?

X

**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:

19/11/17

### 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

X

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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