



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	MEURIG	
Last Name	WILLIAMS	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	EDELWEISS	
Line 2	EBBS LANE	
Line 3	EAST HANNEY	
Line 4	OXFORDSHIRE	
Post Code	OX120HL	
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  Policy  Proposals Map

4. Do you consider the Local Plan is :

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

*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.

SEE SEPARATE SHEET ATTACHED

(continue on a separate sheet/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 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**, 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

## **CONCERNS AND OBJECTIONS**

### **FLOODING**

The proposed site south of East Hanney is up stream of the Mill on Letcome Brook and the development of additional dwellings will result in an increase in the volume of water, both run off and sewerage, being pumped into the Brook and subsequently passing through the village. The plan lacks any solution to manage the increased water volumes and without a solution, the risk of flooding onto the streets of the village will be increased. History shows that East Hanney is susceptible to flooding and this will be exacerbated by any up stream development. East Hanney has experienced significant and damaging floods in 2007 and 2014. According to the Environment Agencies “Areas Susceptible to Ground Water Flooding” map, ALL OF East Hanney is at the highest risk of ground water emergence. Development of the site south of East Hanney under current proposals will obviously increase flood risk to the entire village.

Para 100 of the NPPF states that “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of high risk”.

Para 101 of the NPPF 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”.

Para 103 of the NPPF states that local Planning Authorities should “ensure flood risk is not increased elsewhere”.

We believe that the above clearly demonstrates that inclusion of the development site south of East Hanney on the plan proposed by the Vale is not consistent with national policy as required by the NPPF and is therefore **UNSOUND**.

### **SEWERAGE**

It is known that the sewerage works for the area are at capacity, which currently creates sewerage issues and failures that have already been experienced in the village. The proposed development represents a near doubling of sewerage generated from East Hanney. Without significant investment to upgrade existing sewerage works before any development occurs, there will be insufficient capacity to manage the increased levels of sewage from the new homes proposed at East Hanney. A high risk of exposure to sewage problems for villagers would be inevitable. Thames Water have been open in stating that they do not have the capacity or plans in place to be able to cope with these increased volumes and that it will take years for them to be able to address the need.

We believe that the lack of any suitable proposal and accompanying schedule for providing a solution to the sewage issue means that the plan is not deliverable and therefore not effective as required by the NPPF and is therefore **UNSOUND**.

### **CONSULTATION**

The consultation in Spring 2014 was undertaken with reference to a single site to the east of East Hanney. The switch, some time after the consultation period to an alternative site south of East Hanney appears to be unexplained, unsubstantiated,

unsupported and without logic. This alternative site has not been the subject of proper resident consultation or consideration. Research undertaken locally and provided to you under separate cover has shown that the south site is NOT the preferred choice of the community.

The NPPF requires any plan to be prepared “in accordance with legal and procedural requirements”. We believe the consultation process was flawed in execution and we believe the plan to be **UN SOUND**.