



**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

Dr

First Name

Susan

Last Name

Moss

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Millside

Line 2

Mill Orchard

Line 3

East Hanney

Line 4

Oxfordshire

Post Code

OX12 0JH

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

4

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

☐

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

Yes

☐

No

☐

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

Yes

☐

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.

Proposed Strategic Allocation at East Hanney

Flooding

The Local Plan suggests " neutral effect in terms of climate change and flooding ... the site contains a small area of flood risk ...". Had the Inspector been here in 2007, 2008, 2010 and 2014 or, indeed, seen to the immediate rear of my garden most years, he/she would recognise this as a ridiculous statement.

Development on the south site will remove an important function of the fields around East Hanney, ie the holding capacity and drainage of the land. As a result of the proposed development, the increased water from run-off and processed sewerage water will enter upstream of the mill on the Letcombe Brook which will inevitably lead to more flooding in East Hanney. The EA says that East Hanney is "... highest risk of ground water emergence ...".

The proposed development is not compliant with the proposed Core Policy 42.

Transport/Highways

The Vale appraised that the south site development would bring about "... minor positive effects in terms of reducing the need to travel and promoting sustainable transport ..."!!!!

With 200 houses and an increase of around 160 car trips, the A338 will operate at 93-97% capacity at peak hours. There is not good bus services or effective cycle ways connecting East Hanney to the principal employment areas so people will use their cars. This will clearly increase congestion. The proposed site is not in keeping with paragraphs 29, 30, 32 and 34 of the NPPF.

The proposed south site is not sustainable with respect to transport impacts and will not be compliant with proposed Core Policies 33 and 35. The Plan is, therefore, unsound.

Deliverability

In February 2014, site EHAN05B was determined to be in Flood Zone 2 and 3 and Undeliverable. By November 2014, the site became Deliverable! This is unacceptable, unjustified and unsound.

Bio-diversity/Ecology/Conservation

In the Vale's own assessment of the natural environment, bio-diversity, water and soil quality, the site was appraised to bring about a major negative effect. The proposed development of the south site contravenes NPPF on ecology. I cite paragraphs 9, 17, 101 and, finally, 118 which states " ... planning permission should be refused for development resulting in loss or deterioration of irreplaceable habitats including ancient woodlands ...". The proposed site is an important wildlife corridor and contains potential UK priority habitat.

Development of the south site will not comply with proposed Core Policies 44 and 46.

The Plan is, therefore, unjustified and unsound.

Suburbanisation

The Census of 2011 shows East Hanney with 334 homes. 200 homes will increase the number by 60%. We have recently had two new developments, some under construction, already a significant increase, and further applications are pending. Such a large increase in the population of East Hanney will completely ruin the character, community and rural nature of the village. An additional 200 homes will have also have an unacceptable detrimental effect on the village in terms of air, noise and light pollution (contrary to proposed Core Policy 44).

Sewerage

Sewerage works for the area are working at capacity and 200 homes will nearly double the volume from the village alone. Thames Water admit they do not have the capacity or plans to cope with the increase in sewerage. The Plan is not effective, as is required by the NPPF, and is, therefore, unsound.

Schools

Increased capacity in East Hanney Primary is not in place. Indeed, the school has already exceeded its capacity. The NPPF requires the Plan to be positively prepared and sustainable – it is not, so is unsound.

Heritage

East Hanney has very important archaeological sites, including those of an ancient manor house and Roman road. The proposed South of East Hanney will impact upon these sites of interest. An alternative site would be nmore suitable in this respect so that any artefacts can be explored and protected. The choice of the South of East Hanney site is not justified or effective, potentially inconsistent with proposed Core Policy 39 and, as a result, the Plan is 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, 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:

10/12/14

