



**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	Mrs	
First Name	Philippa	
Last Name	Manvell	
Job Title (where relevant)	Retired	
Organisation (where relevant)		
Address Line 1	Tamarisk	
Line 2	Main Street	
Line 3	East Hanney	
Line 4	OXON	
Post Code	OX12 0JE	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation : Philippa Manvell

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	CP4 – Meeting housing needs	Proposals Map	Strategic Site 6 – south of East Hanney
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4. Do you consider the Local Plan is :

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

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 the 2031 Vale local plan is unsound in a number of respects in terms of meeting housing needs by identification of the site south of East Hanney as follows:

1. The 2031 Vale local plan claims to be in accordance with National Planning Policy Framework, which includes a requirement for local consultation. However the Vale has not consulted locally since spring 2014 when a site to the east of East Hanney was proposed. Comments on that (see Consultation statement points 239 to 245) were made. The alternative site does not address those original concerns eg is no better integrated into the existing village than the old one, is made on the assumption that local facilities already exist and are appropriate, but they will not be sufficient for a more than doubling of the number of homes and the new site would be equally prone to flooding and increase the flood risk to existing properties.

There was no consultation on the alternative site and the first I knew of it was from the leaflet "The Future of the Vale Local Plan 2031 Part 1 consultation on the draft plan. Nov 2014" distributed in the mail and an email from VWHDC dated 7/11/14

The Local Plan Appendix 8 identifies a number of sites in and around East Hanney, including EHAN05B that was deemed as unsuitable. That area of land is now included in Strategic Site 6 without explanation as to how the contra-indications would be addressed.

2. The core policy 42 relating to flood risk sets out to ensure that developments include measures to reduce flood risk to the site and surrounding areas.

The proposed site is adjacent to various areas already classified as Flood Zone 3 and the village has a recent history (2007 onwards) of significant floods causing damage to property and vehicles as well as cutting off road access. Development of this site can only increase the risk of flooding to existing properties by increasing both water run-off and processed sewage entering the Letcombe Brook.

Furthermore, the site is downstream on the Letcombe Brook of both Grove and Wantage (two areas also identified as sites for major expansion) which will also contribute increased runoff and discharge from the local sewage treatment works.

3. The Vale policy is for developments to have minimal impact on transport. However increased housing on the proposed site will result in increased traffic joining the A338 which already has two difficult and dangerous junctions into/out of the village.

Currently the A338 cannot cope with the volume of traffic at peak times travelling north towards Abingdon/Oxford or south towards Wantage/Grove for schools, employment, shopping, medical facilities, leisure activities etc.

Currently the Steventon road from East Hanney to Didcot is in very poor condition, prone to regular accidents and is not suitable for an increased volume of traffic to the railway station, the A34 or employment in Milton/Didcot.

The bus routes (31 and X30) provide an hourly service to Grove/Wantage or Abingdon/Oxford but there is no direct service to Milton Park, Harwell, Faringdon or Didcot. The current frequency would not cope with additional passengers, including those joining from new developments in Grove/Wantage

4. The Vale has core policies on ecology and biodiversity yet seems to ignore these in the selection of this site. The area is bounded by a designated wildlife area, the Letcombe Brook acts as a natural corridor for wildlife and is home to several protected and uncommon species including water voles and kingfishers. Major development of the type proposed will significantly detract from the natural environment.

5. The Vale policy requires the site to be integrated and consistent and appropriate (CP39). This site does not meet those criteria and the village character and identity will be lost.

To build 200 additional homes in one block will completely overwhelm the existing village of East Hanney which currently has some 330 homes, built over time and intermingled one period with another and including listed buildings and a conservation area.

There is no safe pedestrian access (pavement or public rights of way) from the site into the existing village and the current road layout and drainage ditches, together with the proximity to the Letcombe Brook, would make this difficult to achieve. The proposal is for a new access from the A338 thus making the development a separate entity and not integrated with the existing village.

Mitigation of water run-off and flood risks are again required in policy CP39, but no measures to manage them are proposed (see above).

The target of 30 dwellings per hectare defined in CP 23 is much higher than the current density of the established village. The proposed site of 8.2ha and some 200 houses (Appendix A Site development templates 3. Abingdon-on-Thames and Oxford Fringe Sub-Area) will not even be below 30 when account is taken for open spaces, landscaping and infrastructure.

SEE CONTINUATION PAGE

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.

Vale Council should reconsider their site selections and ensure that the only locations identified are appropriate to provide the local housing needs in a sustainable way. This site in East Hanney is unsound in a number of areas of the Vale's core policies on housing development.

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 adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

14/12/14