



**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	Jennifer	
Last Name	Scott	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	Cross Tree House	
Line 2	The Green	
Line 3	East Hanney	
Line 4	Oxfordshire	
Post Code	OX12 0HQ	
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

CP 4

Proposals Map

Land South of East Hanney

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

yes

No

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

Yes

No

No

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

Yes

No

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.

I believe that the allocation of 200 houses on 8.2ha on land South of East Hanney is unsound for the following reasons.

1. The proposed housing density does not comply with Core Policy 24. The proposal is for 25 houses per hectare, which is well above the current density in the village. Core Policy 24 states that housing densities of 30 per hectare will be required unless this would have an adverse effect on the character of the area. East Hanney is a rural village (part of it is in a conservation area) with a very low housing density. The proposed density is completely inconsistent with the character of the existing village and it fails to comply with Core Policy 24.

2. The site includes an area that was identified by the Vale District Council as non-deliverable. It is totally unclear why/how the Vale can state that part of the site is undeliverable yet propose that the complete site is deliverable.

3. The site does not comply with Core Policy 33 and 35. This states that sites should promote sustainable transport.

The public footpath between East Hanney and Grove crosses ploughed fields, involves crossing more than 10 styles and an uncontrolled crossing of the main London to Bristol railway line. This is not suitable as a route for walking to school, health care facilities, library, leisure centre or shops.

There is a brideway to Grove from East Hanney but this is an unmade farm track, heavily rutted and muddy for much of the year. This is unsuitable for walking/cycling to secondary school, health care facilities, library, leisure centre or shops.

Cycling or walking along the main A338 road to Grove and Wantage is extremely dangerous. There is no pavement and the road is narrow with a high volume of existing traffic (which will increase substantially with other proposed developments). There have been fatalities on this stretch of road.

East Hanney is served by buses between Wantage and Abingdon and Oxford but has no direct connections to the centres of employment at Harwell Science Centre, Didcot or Milton Park. Travel by bus to these sites requires two buses from separate companies and, assuming connections work, takes over 1 hour to travel less than 8 miles.

The site does not safely link in with the existing facilities within the village. The one route for pedestrian access is via a narrow bridge across the Letcombe brook. In places there is wither no footpath or else the footpath is too narrow (at 18 inches) to be of practical use. This is the route to the village pre-school and primary school from the proposed site. It is unsuitable and dangerous for small children and parents with pushchairs, as well as for the elderly and anyone with limited mobility.

The primary school is full and will require expansion but the school grounds are too small for this. The Vale proposes moving the pre-school to the new housing site. This will discourage parents from walking as many will have to visit both pre-school and primary school and will need to use a car to achieve this at both ends of the school day.

4. The site does not comply with Core Policy 39. There is evidence of an ancient manor under the site and signs of a roman road are clearly visible in the adjacent field. If this site is developed, these historic features are at risk of being destroyed.

5. Many properties and the road system within East Hanney are at high risk of flooding and flooding has occurred on a number of occasions, causing extreme damage to a number of properties and businesses. The proposed site plays an essential role as a storage area for rainfall and the undulating nature of the old orchard and the cropped areas increase water retention and increase the soil moisture deficit levels. The community have formed a very active flood group and are aware of how vulnerable the village is; the group has worked closely with the environment agency. The data used for assessing flood risk is often based on LIDAR data and this has not sufficient spatial and height resolution to enable accurate modelling to be carried out. The low banks of the stream and flat terrain mean that differences in height of only a few inches can make a significant difference in both direction and volumetric flow. Construction of 200 houses on this site next to the stream and upstream of the village pose very real and serious flooding risks for property in the existing village.

6. East Hanney should not have been classed as a Larger Village. The scoring system has chosen an arbitrary 14 points and above to be classed as a Larger Village. East Hanney was given a score of exactly 14. However, this is not fully justified by the actual services available to residents. One point was for a library, but this is a mobile van that visits only once a fortnight and can only be used by those who are at home in the day time. Moreover, it is expected to be terminated as this service is under review. A further point was allocated for a local shop, but this is a small community shop run by volunteers; it is not a commercial enterprise and its future is uncertain. There is

7. One point for a place of worship; this is a tiny chapel. The analysis to determine which are larger villages and so which are identified as suitable for strategic housing development is too coarse.

8. The site does not comply with Core Policy 46: Conservation and Improvement of Biodiversity

future is uncertain. There was one point for a place of worship but this is a tiny chapel.

7. There are a number of red listed species found on the site and the area is being suggested as a Local Wildlife Area by Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust. The site had a sustainability assessment and this identified two major negative issues. I believe that the site has failed the Vale's own sustainability assessment.
8. The proposed site is not provided with the required infrastructure. As well as flooding, the village also suffers from poor sewage infrastructure. Thames Water have identified this in recent planning applications yet planning is still allowed on the assumption that this will be provided. An increased sewage infrastructure will be required locally for 200 houses and with major developments on the other sites in Wantage and Grove will mean that the Wantage Sewage Treatment Works will need to be upgraded. Thames Water operate on a rolling 5 year plan and there are currently no plans agreed with Thames Water. This is likely to mean that housing will be built in advance of the sewage infrastructure being available. East Hanney is down stream of the outfall from the sewage works. Legally Thames Water can discharge untreated water into the brook in times of high rainfall, until the sewage treatment works capacity is increased East Hanney is again at risk of flooding because of the additional discharge from the treatment works.

I believe that the Local Plan has failed in its duty to co-operate.

The Local Plan originally indicated land to the East of East Hanney. At the public meeting, there was overwhelming objection to a single site of 200 houses, but there was some support for smaller developments within the village. Some smaller developments are already happening, without consultation.

The Vale did not engage in further public consultation and changed sites to the South of East Hanney. There was no advance warning to the public, no leaflets, no information on the Vale's web site, no exhibitions. In fact, in the recent Vale News that was distributed by email on 3rd October, there was no mention of the Local Plan at all.

It was stated that the Vale would set out the reasons for this change based upon evidence and public consultation. There was NO public consultation on the proposal to change from the East to the South (but my stated objections to the South site also apply to the East site).

A group of East Hanney residents has prepared a community response that has been submitted by the Parish Council. I ask that this is given full consideration as a well-researched document from the community.

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.

The strategic housing allocation of 200 houses on land to the South of East Hanney should be removed.

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

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: