



**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

Christopher

Last Name

Baker

Job Title

Retired

(where relevant)

Organisation

(where relevant)

Address Line 1

Long Acre

Line 2

Oxford Road

Line 3

East Hanney

Line 4

Wantage

Post Code

OX12 0HP

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?

THIS REPRESENTATION RELATES TO THE VALE'S FAILURE TO ADDRESS SEWERAGE ISSUES IN EAST HANNEY.

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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

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.

The discharge of untreated sewage from inadequate sewers is of major concern to many residents of East Hanney, including myself. Our house is the most northerly dwelling on the Oxford Road (A338) in East Hanney – i.e. at the end of the sewer. As a result, we are particularly susceptible to sewer

backup. This occurred to us last winter. For a period of about two weeks, it was not possible to adequately flush the toilets and sewage was seeping out of the manhole in the back garden covering an area of approximately 20m². This was not only very unpleasant but was also a health hazard. Eventually, after several telephone calls, Thames Water did eventually sort out the problem and clean up and disinfect the affected area.

Next year (2015), approximately 31 additional houses adjacent to the A338 alone will have been completed and connected to the sewer system in East Hanney. The overload on the sewers and the Wantage waste-treatment works (which serves the Hanneys) will therefore get significantly worse even in the short term.

The Vale's Plan proposes building an additional 200 (or thereabouts) houses South of East Hanney. It is obvious that considerable enhancement of the existing sewers and waste-treatment works will be required to accommodate the additional load. The Vale has done its best to sidestep this issue as no specific remedial actions are highlighted in the Plan. They do however state that *"Proposals will need to demonstrate that there is adequate water supply capacity and/or waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users."* (VoWH Local Plan 2031, Part 1, Appendices, Part 1, Page 4). How is this going to be done? Before they even propose a scheme such as this, they should at least establish that it is feasible. Thames Water has stated that the required investment in these additional facilities will not even be considered until its next five-year Asset Management Plan (AMP6), which runs from 1 Apr 2015 to 31 Mar 2020, is in place. Moreover, upgrades to water treatment plants normally take 3-5 years. Other much larger developments (e.g. at Grove) have recently been approved and will undoubtedly take priority over Hanney's needs. In fact, the Vale's Infrastructure Delivery Plan mentions in Section 8.8 that an upgrade to the Wantage treatment plant is required. However, it is stated in Section 8.9 that *"the Thames Water draft Business Plan 2015-2020 anticipates making improvements to a series of existing sites including the treatment works at Faringdon and Oxford between 2015-2020"*. No mention is made about improvements to the Wantage treatment works.

Consequently, I believe that the proposed additional 200 houses South of East Hanney is not sustainable.

The National Planning Policy Framework (NPPF) states that: *"the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, ..."* (VoWH Local Plan 2031, Part 1, Introduction, paragraph 1.10). In the case of the infrastructure requirements for the South of East Hanney site, this requirement has clearly not been met. This aspect of the Local Plan is therefore not sound and consequently not legally compliant.

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.

Given that any developer has the automatic right to connect into sewer system at short notice, it is essential that the sewers and water treatment facilities be upgraded and brought up to an acceptable standard before planning permission is granted or any building work started. This may (or may not) make the scheme sound.

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 2014

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?

THIS REPRESENTATION RELATES TO THE VALE'S FAILURE TO CONSULT WITH THE RESIDENTS OF EAST HANNEY DURING THE PREPARATION OF THE PLAN.

Paragraph

Policy

N/A

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

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.

There is a major flaw with the final version of the Plan published in November 2014 in relation to the South of East Hanney site. This is the lack of prior consultation by the Vale about this site with the local community, either the parish council or individuals. The interim version of the plan, published in February 2014, included provision for a development to the East of East Hanney. Objections were raised at a public meeting held in March 2014 as to the scale of the development – 200 homes. The unilateral response of the Vale was to move the proposed development to a site South of East Hanney. The lack of consultation is therefore not consistent with the requirements of the National Planning Policy Framework (NPPF). Consequently the plan is unsound and is therefore not legally compliant. Moreover, the Duty to cooperate has not been met.

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.

Given that the Plan has been prepared without consultation with the local community, it is difficult to see how this process can be reversed.

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

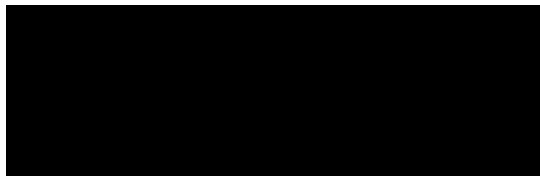
☐

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 2014