

Date: 22 November 2017
Our ref: 228525
Your ref: Vale of White Horse District Council Local Plan 2031 Part 2



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir or Madam,

Planning consultation: Vale of White Horse District Council Local Plan 2031 Part 2

Thank you for your consultation on the above dated 11 October 2017 which was received by Natural England on the same day

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is of the opinion that as it stands this Local Plan is not legally compliant and currently **does not** meet all of the tests of soundness, namely, whether it is effective and whether it is consistent with national policy. However, Natural England's concerns centre around the need for further evidence. Discussions are already being held with regard evidence requirements and once this information is available we would be happy to review our advice with regards to soundness of the plan.

Habitat Regulations Assessment

Cothill Fen

Air Quality

The HRA recognises that the site allocations at Dalton Barracks and South East of Marcham are likely to lead to increased vehicular movements in the local area. However, it is assumed that the main routes used will not be the smaller roads around Cothill Fen. Traffic modelling is needed to support this assumption. The modelling should be used to determine whether there will be an increase in traffic flows by more than 1000AADT on these roads, should this be the case Natural England would advise there is a likely significant effect on the SAC and further air quality and assessment would be required.

Hydrology

Paragraph 5.5.5 states that studies have been undertaken which demonstrate that it is very unlikely that surface or shallow sub-surface flows from the development footprint would occur into the catchment of the SAC and nearby SSSIs within the same catchment, or that groundwater from the development site would interact with the Cothill Fen designated areas. However, these studies are not presented in the HRA and should be provided to support the conclusions.

Oxford Meadows

It is understood that air quality assessments undertaken for the Local Plan Part 1 used housing figures above that to be delivered by the combined LPP1 and LPP2, and found there to be no likely significant effects on Oxford Meadows SAC. It is reported that there were assumed improvements in background nitrogen deposition rates; Natural England advise that these assumptions need to be backed up with evidence of current rates of improvement and this information should be included

within the HRA.

Currently the HRA does not assess the in-combination effects on air quality at Oxford Meadows with planned growth in Cherwell, West Oxfordshire and Oxford City Councils. It is reported in the HRA that this approach has already commenced under the auspices of the Oxfordshire Growth Board, although this work has yet to be published. Natural England have also met with all the Oxfordshire Local Authorities to find an appropriate approach to in-combination assessments of air quality at Oxford Meadows SAC in their Local Plans. This work is ongoing and it is hoped a conclusion will have been reached on whether there is a likely significant effect from the in-combination effects of planned growth across the County on Oxford Meadows SAC, and how this can be mitigated, before the examination into the Vale Local Plan Part 2. However, until this has been completed Natural England advise that it cannot be assumed that the current plan level measures will be sufficient to mitigate the impact.

Local Plan Policies

Core Policies 8a and 8b:

As per our comments on the HRA, the evidence to show that there will not be a hydrological impact from development at Dalton Barracks either on Cothill Fen SAC, Dry Sandford Pit SSSI or Barrow Farm Fen SSSI is needed to accompany the Local Plan to demonstrate that development in this location is deliverable. Potential cumulative effects with development at Marcham also needs be considered in relation to hydrological impacts on Barrow Farm Fen SSSI.

We welcome the commitment to produce a comprehensive development framework for Dalton Barracks; the opportunity to buffer the SAC with high quality habitats, and potentially provide an extension to the adjacent nature reserves should be investigated. Opportunities to restore acid grassland, heathland and fen habitats should be taken, in accordance with the aims of the West Oxford Heights Conservation Target Area. Measures will need to be put in place to ensure the ongoing management of the Country Park.

Core Policy 15a: Additional Site Allocations for South-east Vale Sub-Area

Harwell Campus

The Harwell Campus site is within the North Wessex Downs AONB. In considering this site for development your authority:

- has a statutory duty of 'regard' to the statutory purpose of this nationally designated landscape (i.e. conserving and enhancing the area's natural beauty) which applies to this decision; and
- should be guided by the National Planning Policy Framework (NPPF) which provides the highest level of policy protection to the 'landscape and scenic beauty' of the AONB. Paragraph 116 of the NPPF sets a default of no major development within an AONB unless a set of criteria are met which clearly demonstrate that exceptional circumstances apply. This is commonly referred to as the 'major development test'.

We note that the Harwell site is not required to meet the housing requirements for the South-east Vale Sub-Area, those having been met in Part 1 of the Local Plan. We understand however, that development of the site is linked to the future viability of the Harwell Campus and deemed essential to that. Because this constitutes major development within the AONB the major development test needs to be applied to demonstrate that this is the only means of securing the future of the Campus and that the effect on the landscape and scenic beauty of the AONB can be moderated (or 'mitigated'). We note that the evidence base provided in support of the plan seeks to make the case for exceptional circumstances at Harwell. To help demonstrate complete application of the test we ask that you:

- Explain how the type of development proposed for the site will support the viability of the Campus, particularly how the 25-35% of new housing to be offered for sale at market rates would contribute to this.
- Ensure and provide details of a mitigation package for the site which will minimise the impact of the development on the wider AONB, notably but not only on views from the Ridgeway

National Trail. We note that some screening of the site may already be provided by existing shelter belts but that these would need to be thickened and supplemented with new planting around and across the site to achieve an effective screening effect. We are also concerned that the pattern of proposed development of the site (the density of industrial and housing elements) may not allow for space within and adjacent to the built development for a green infrastructure sufficient to soften the impact of otherwise visually unbroken development across the site. This puts at risk the infrastructure requirement for this site stated in the Local Plan 2031 Strategic Sites and Policies Appendices document adopted in December 2016 i.e. 'the mass and scale of the built form should be designed to avoid being visually intrusive in sensitive views from the surrounding countryside and particularly the AONB'.

All of this will need to be informed by careful masterplanning of the site and informed/supported by a Landscape and Visual Impact Assessment. Given the sensitivity of this site within the AONB and the challenge of producing a mitigation package to fully satisfy the third part of the major development test, you may also like to consider whether the landscape fabric of the surrounding area might be improved by repairing or reinstating traditional and defining landscape features. This strengthening of landscape character could help the wider AONB to better accommodate and carry the changes to the Harwell site. We would be happy to talk to you about this aspect of mitigation but would envisage the AONB Partnership having the key role in determining where and how resources could be used to best effect.

The points made above are not, at this stage, a challenge to the soundness of the plan but are seeking essential additional information to ensure that the development of the Harwell site is fully in accordance with national planning policy and upholds the statutory purpose of the AONB.

If you have any queries relating to the advice in this letter please contact me on 020822 57686. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

Rebecca Micklem
Sustainable Development
Thames Team