

## Local Plan 2031 Part 2

### Publication Version Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

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	Ms	
First Name	Haidrun	
Last Name	Breith	
Job Title (where relevant)	Senior Biodiversity & Planning Officer (Oxon)	
Organisation representing (where relevant)	BBOWT (Berks Bucks Oxon Wildlife Trust)	
Address Line 1	The Lodge	
Address Line 2	1 Armstrong Road	
Address Line 3	Littlemore	
Postal Town	Oxford	
Post Code	OX4 4XT	
Telephone Number	01865-775476	
Email Address	haidrunbreith@bbowt.org.uk	

## Part B – Please use a separate sheet for each representation

Name or organisation: BBOWT (Berks Bucks Oxon Wildlife Trust)

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

Paragraph

Policy

8a, 8b, 14a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

x

No

4. (2) Sound

Yes

No

x

4. (3) Complies with the Duty to Cooperate

Yes

x

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

*Please see attached letter. Our comments relate to:*

- *Habitats Regulations Assessment (HRA)*
- *Core policies 8a & 8b (Dalton Barracks) and associated section in appendix A*
- *Appendix A: Site Development Template*
- *Core policy 14a (Upper Thames Strategic Storage Reservoir) and appendix D*

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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 see attached letter.*

(Continue on page 4 /expand box if necessary)

**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 see attached letter.*

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

22 Nov 2017

### Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

### Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☒

I would like to be added to the database to receive general planning updates

☒

Please do not contact me again

☐

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

*Please see attached letter for comment.*

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

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Vale of White Horse District Council  
[Planning.policy@whitehorsedc.gov.uk](mailto:Planning.policy@whitehorsedc.gov.uk)

**By email only**

22<sup>nd</sup> November 2017

Dear Sir or Madam,

**VoWHDC- Local Plan 2031 Part2 (Detailed Policies and Additional Sites) Publication Version  
October 2017 - BBOWT comments**

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on above consultation. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of the local ecology in the district.

As mentioned in our previous consultation response we are generally concerned about the quantum of development proposed in the district, which will inevitably impact on wildlife even if the most ecologically-rich areas are avoided. If development on the proposed scale has to happen we consider it essential that it is not only located in places where it causes least environmental impacts but is also of a layout and design that allows for green infrastructure and biodiversity to be integrated into the development creating diverse and high quality environments.

**GREEN INFRASTRUCTURE STRATEGY (OCTOBER 2017)**

We welcome the production of a combined Green Infrastructure Strategy for this district and the neighbouring South Oxfordshire district. We haven't reviewed this document in any detail but believe that the analysis and findings offer valuable information on green infrastructure provision that should be used to inform site allocations and planning decisions.

## HABITATS REGULATION ASSESSMENT (HRA)

We have commented in some detail on aspects of the HRA in our previous consultation response. In particular we outlined concerns with regard to impacts on Cothill Fen Special Area for Conservation (SAC) due to the amount of development proposed within 2km distance from the site as well as some transport improvements, in particular the Dalton Barrack's site (please see previous response for more detail). We remain concerned about the potential indirect and cumulative effects on this internationally designated site in Oxfordshire but are guided by Natural England's response to this in particular with regard to air quality, hydrological impacts and cumulative impacts.

As outlined in the HRA we manage a number of designated sites and nature reserves in the area. In this role we are particularly concerned about impacts on sites caused by recreational pressure. Some of the reserves are already subject to high visitor numbers and we believe that the provision of a minimum of 1,290 homes (potentially rising to 4,090 in the long term) within 2 km of the SAC will inevitably result in an increase in visitor numbers even with mitigation. We are also of the view that the sites are and will not only be used by residents of nearby residential areas but also attract people from further afield, in particular if walking and cycling links are improved as proposed. We note and welcome that these and related concerns have been recognised in the latest revision of the HRA.

We also welcome that the HRA recognises in para. 5.5.22 that the location and area of the SANG are not the only considerations but that *"... the SANG must also be of a nature that is likely to attract visitors to utilise it rather than the nearby SAC."*

This is in line with our view that the success of such a recreational site will very much depend on the size, location, design and connectivity of this space.

As outlined in our comments on core policy 8b (Dalton Barracks) below we are not only concerned about increased recreational impacts on the SAC but also the Dry Sandford Pit SSSI, which adjoins the Dalton Barracks site to the West. With regard to this and the nearby SAC we are particularly concerned that any assessments (including this HRA) only assess the proposed allocation of 1,200 dwellings and not the long-term aspiration for 4,000 dwellings (after 2031) at Dalton Barracks as outlined in para. 2.63 of the main consultation document.

In light of such a significant potential increase in housing in the long term we consider it essential that a proactive approach to green infrastructure planning is adopted and future developments are taken into account. Whilst the provision of 80ha of country park might be sufficient to provide alternative open space for 1,200 dwellings we believe it insufficient to address future growth on the proposed scale. We therefore consider it necessary that an adequate semi-natural space of a minimum of 100+ha is provided on the site at this point in time to work towards addressing some of the need of future communities. We consider such an approach necessary not only for potential future development reasons but also to address existing open space deficiencies as outlined in the Council's Green Infrastructure Strategy (see comments below). We also believe that the provision of any country park will attract people from further afield adding further pressure on open space resources.

We would also like to stress that any green infrastructure, country park or other open space provision will need to come with the necessary funds for long-term management.

## **MAIN DOCUMENT:**

### **Core Policies 8a (Additional Site Allocations for Abingdon-on-Thames & Oxford Fringe) & 8b (Dalton Barracks Comprehensive Development Framework) & Appendix A - Section 4 – (Dalton Barracks, Shippon)**

BBOWT has responded to this allocation at the last consultation raising concerns about potential impacts on Dry Sandford Pit SSSI and other designated sites including Cothill Fen SAC (see also comments above).

We note a minor change to the western boundary of this allocation but this does in our view not constitute a substantial change to this proposed site allocation and our previous comments still apply. We also note that the document is now more specific in so far that the allocation is for 1,200 dwellings by 2031. However, para 2.63 states that the site is considered to have greater long-term potential in the excess of 4,000 dwellings subject to appropriate infrastructure. This is more than three times as much as currently proposed and more than outlined in the previous consultation.

We are very concerned that impacts of this site allocation are not being assessed comprehensively at this stage but will come forward in a piecemeal fashion. We consider it important that decisions and impact assessments are based on the long-term aspirations of the site and not just for 1,200 homes, which in effect is only phase 1 of a larger development proposal.

As outlined in our previous comments the site is a short distance from Cothill Fen SAC and other designated sites such as Dry Sandford Pit Special Site of Scientific Interest (SSSI), Hitchcopse Pit SSSI and Hitchcopse South Sandpit Local Wildlife Site (LWS). We are particularly concerned about Dry Sandford Pit SSSI & BBOWT nature reserve, which adjoins the allocation site to the northwest and will therefore be in close proximity to development on the Dalton Barracks site.

The ecological interest of Dry Sandford Pit includes amongst other things great crested newts and rare solitary bees and wasps, latter of which we believe use vegetation on the Dalton Barracks site as a nectar source. Development of the Dalton Barracks site could therefore potentially adversely affect the species interest of the SSSI and we consider it therefore important that the ecological interest of the Dalton Barracks site is adequately assessed for the policy to be found sound.

Dry Sandford Pit comprises rare fen habitats that are sensitive to hydrological changes. Being a former quarry it is lower lying than the Dalton Barracks site raising also concerns about hydrological changes and potential leakage. We consider it essential that an assessment of the potential hydrological impacts to the SSSI from this development is carried out. Without this the plan might be considered unsound as it cannot be demonstrated that appropriate mitigation measures could be secured to enable the delivery of the allocation if impacts were to be identified at a later stage.

Dry Sandford Pit is already subject to high visitor numbers, in particular dog walkers. We welcome people to enjoy the reserve for quiet recreation but don't encourage great visitor numbers as it can cause difficulties when managing this ecologically sensitive site with livestock. We are concerned that visitor pressure might increase to levels that make the management of the site with livestock untenable. This together with high dog usage would in our view almost certainly result in a decline in the habitat condition of the SSSI.

We recognise and welcome that policy 8b seeks to mitigate impacts by providing a substantial recreational open space in form of a 80+ ha country park, however, it will depend on its location, design and long-term management whether it can be effective in mitigating direct and indirect impacts on the nearby SAC, SSSIs and LWS. The site allocation is unspecific on the location of this country park within the site but we consider it essential that it is located along the northern and western boundaries to provide a buffer of appropriate semi-natural habitats to Dry Sandford Pit SSSI and Cothill Fen SAC.

Related to this we consider a 10m buffer between the Sandford Brook and development as mentioned in the site allocation template in appendix A wholly inadequate. The Sandford Brook runs through Dry Sandford Pit SSSI and along the western boundary of the site and for reasons outlined above we consider it essential that the western and northern parts of the site remain free of development.

Whilst we welcome the Council's proposal for a 80+ ha country park we believe that this will not be sufficient in light of the Council's aspiration for 4,000 dwellings on this site and other development in the wider area. We believe that a country park of a minimum of a 100+ ha should be secured on this site for the following reasons:

- to address existing deficiencies in 100+ha accessible natural greenspace provision as outlined in the Council's Green Infrastructure Strategy. The GI strategy shows in figure 2.5.3 a lack of 100+ha site on the western side of Abingdon (and westwards). In addition, it highlights on page 92 the need for the creation of a 20-100ha site to address existing open space deficiencies and to meet the needs of communities in the planned new development to the north and northwest of the town;
- to proactively plan ahead to work towards meeting the demand of future communities. This is unlikely to meet the need for 4,000 homes but it is proactive first step in planning ahead whilst the opportunities exist;
- to offer alternative natural open space not only for adjacent residents but for people from further afield, who in our view will inevitably be drawn to such a site (e.g. for dog walking)

The Dalton Barracks site does in our view offer a rare opportunity not only to provide housing but to also proactively plan for green infrastructure at a scale that is otherwise difficult to achieve.

We welcome that development on this site is proposed to be of design that reflects the 'Garden Village' principles, however, we feel that more information is required to understand what this means and to provide guidance and confidence that this development will be more sustainable and of better layout and design than other developments.

We welcome the requirements outlined in the Biodiversity and Green Infrastructure section of this proposed allocation. However, we could not find any indication that this site allocation and its requirements are informed by ecological survey information, which we consider essential, especially when considering the context of the nearby SSSIs and SACs.

We also feel that a number of important aspects are not included although they are mentioned in other site allocations. These include the need for integrated sensitive Sustainable Urban Drainage (SUDS) measures, the integration of green infrastructure and biodiversity enhancing measures within the development and the need for long-term management of all green infrastructure including the country park.



We note that the Council is proposing to consult stakeholders as part of its SPD process and we would very much like to be involved in this process with a view to help minimise impacts on the adjacent Dry Sandford Pit SSSI and Cothill Fen SAC and associated designated sites.

**Core policy 14a (Upper Thames Strategic Storage Reservoir) & Appendix D (Land Safeguarded for Upper Thames Reservoir)**

We note that the Council is safeguarding a large area of land west of Abingdon for a potential reservoir. We have no principle objection to this but little detail is currently available and we have a number of concerns which should be taken into account should this project be pursued further.

Data from Natural England (NE) and the Thames Valley Environmental Record Centre (TVERC) shows the area to contain considerable amount of priority habitat (Coastal and Floodplain Grazing Marsh). In addition, the reservoir might affect a Local Wildlife Site (The Cuttings and Hitchins Copse LWS) at its south western corner, which is designated for its ponds, fen and lowland deciduous woodland. The potential impact on designated sites, priority habitats and species will need to be carefully considered and should be avoided wherever possible

We also believe that the proposal for a new reservoir should be based on a thorough assessment of the need for increasing water supply. This must ensure that all possibilities of reducing any increase in demand for water, through using new technologies and changing the way people use water, are promoted.

We also have concerns about potential indirect effects such as impacts on wildlife in the Thames downstream from the reservoir caused by abstraction and the impact of associated infrastructure. We expect these concerns to be fully examined as part of the assessment of the environmental impact of a reservoir proposal.

The Cothill area lies north of the proposed reservoir site and includes areas protected under European Law for their rare habitats, and a number of nature reserves. Many habitats within the Cothill Fen area are very sensitive to changes in water quantity and quality and we would be opposed to any proposal that would have a significant impact on any designated nature conservation sites.

Notwithstanding that the nature of the proposed reservoir will provide limited opportunities for habitat creation within the reservoir, we would expect that all possibilities for the creation of habitats that support valuable wildlife are examined, both on the reservoir itself and in the immediate surroundings.

## APPENDICES

### Appendix A: Site Development Template

#### **Appendix A - 1. Introduction**

The consultation document states:

*Core policies 8a (Additional site allocations for Abingdon-on-Thames and Oxford Fringe Area) and 15a (Additional site allocations for South East Vale Sub-area) explain that the additional allocations will be brought forward through a masterplanning process involving the community, Local Planning Authority and the developer.*

This wording is not identical with what is proposed in policies 8a and 15a with regard to stakeholder involvement in the masterplanning process. We would therefore ask the sentence to be revised as follows to reflect the wording in core policies 8a and 15a (additional wording is underlined):

*Core policies 8a (Additional site allocations for Abingdon-on-Thames and Oxford Fringe Area) and 15a (Additional site allocations for South East Vale Sub-area) explain that the additional allocations will be brought forward through a masterplanning process involving the community, Local Planning Authority, relevant stakeholders and the developer.*

#### **Appendix A - 2. General Requirements for All Housing Site Allocations**

The National Planning Policy Framework (NPPF) and the government's Natural Environment White Paper require development to achieve a net gain in biodiversity to halt the ongoing decline in biodiversity. In addition, the Council's own core policy 45 (LP 2031 Part 1) requires a net gain in green infrastructure and core policy 46 (LP 2031 Part 1) advocates the use of a biodiversity accounting calculator.

We welcome that the development template includes a section on biodiversity, however, we feel that the wording is insufficiently strong to achieve a net gain as required by national and local policy and recommend the following revised wording (additional wording is underlined):

*Biodiversity:*

- ...
- *Important ecological assets should be retained ~~where possible~~. If loss is unavoidable then appropriate mitigation or, as a last resort, compensation measures should be provided.*
- *Development should achieve a net gain in biodiversity, which will need to be demonstrated e.g. through the use of an accepted Biodiversity Impact Assessment Calculator such as the Defra Metric.*
- *Development is expected to enhance biodiversity, for example, by incorporating natural habitats and tree planting into development and by designing buildings with green roofs and walls and integral ~~bat boxes and bird~~ nesting opportunities for birds and bats. ~~in appropriate circumstances.~~*

Without these changes we are concerned that the template will not be effective in conserving existing biodiversity interest and maximizing opportunities for enhancing biodiversity within developments.

### Ecological Baseline Surveys

We have raised this issue in our previous comments but could not find any information that suggests that the allocations have been informed by baseline ecological surveys. Para. 158 of the NPPF requires Local Planning Authorities to base local plan policies ... *on adequate, up-to-date and relevant evidence* ... As such surveys are required to inform judgements on suitability and capacity. The potential lack of ecological surveys would be in conflict with the NPPF and could result in allocations being found unsound.

Whilst we believe that most of the allocations are unlikely to comprise ecologically sensitive sites there are some that come close to designated sites (e.g. Dalton Barracks) or have protected/notable species or habitats on site. Allocation sites that are deemed to be more sensitive should be assessed prior to a decision on their suitability being made

### Masterplanning

We have raised this issue in our previous comments but have not been able to find any information on whether and to what degree housing numbers have been tested by appropriate masterplanning. It is our experience that developers see dwelling numbers in Local Plans not as a potential maximum that is subject to a number of criteria but as a given number and as such care needs to be taken that housing numbers are not overestimated. We consider it important that all housing allocations are accompanied by such supporting information to provide confidence that housing can be delivered in a way that results in a high quality environment with sufficient green infrastructure and which is in keeping with the local landscape character. We had hoped that such testing would have taken place at this stage in the allocation process.

We note that the words '*subject to masterplanning*' have been added to some selected allocations. We are not sure why they have been added to some sites and not others but would expect that all housing numbers are subject to appropriate survey work and masterplanning, and should only be approved if they can be accommodated in a way that results in a high quality and sustainable development. We recommend that such appropriate wording is included for all allocations.

We welcome the provision of a template to provide information and guidance of what information is expected at the next stage of the process, however, we consider the site allocation templates to provide limited detail. For example sites don't specify the distribution of housing and green infrastructure within the site. Neither does the template or subsequent site allocations mention the requirement for long-term management of existing and proposed green infrastructure assets, which we consider essential.

### Ongoing Long-Term Management

We have not been able to find any reference in either the main document or this site allocation template that requires that due consideration is given to the long-term management of existing and proposed green infrastructure (GI) assets including open spaces. The only exception to this is a reference in the 'East of Kingston Bagpuize and Southmoor' allocation template, which includes a requirement for long-term management of biodiversity enhancement measures.

We could also not find any requirement in the already adopted Part 1 of the Local Plan 2031.

In our experience, the lack of ongoing adequate management is one of the key problems in delivering biodiversity and open space benefits in the long-term and we strongly recommend that

the requirement for Landscape and Ecological Management Plans and ongoing long-term management is included in either the General Requirements for All Housing Site Allocations in appendix A or in the Development Management policies in the main document.

**Appendix A - Section 4 (Dalton Barracks)**

See comments under core policy 8b Dalton Barracks above.

**Appendix D - Land Safeguarded for Upper Thames Reservoir**

See comments under core policy 14a above.

I hope that these comments are useful; should you wish to discuss any of the matters raised, please do not hesitate to get in touch.

Yours sincerely,