

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Environment Agency (Mr Jack Moeran)
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Consultation Point	Core Policy 40: Sustainable Design and Construction (View)
Status	Submitted
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Q1 Do you consider the Local Plan is Legally Compliant?	No
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

Q4 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.

Core Policy 40: Sustainable Design and Construction

The WCS has been undertaken to support the evidence base for the Plan in order to determine the impact the proposed growth within the district would have in relation to the water environment.

Whilst the current WCS has yet to be finalised it has concluded, within Section 4, its finding in relation to water resources.

The role and responsibility of delivering water supply across the district sits with Thames Water Utilities.

Thames Water manage water resources within Water Resource Zones (WRZ). The Swindon and Oxfordshire (SWOX) zone covers the Vale of White Horse District. The

Water Resources Management Plan 2015-2040 (WRMP) sets out their proposed 25 year strategy for maintaining the balance between the supply and demand for water in their region. Thames Water update their WRMP each new AMP period, and take into account actual changes in population and consumption, as well as regulatory changes.

Due to the growth within the SWOX area it is estimated the WRMP will have a supply demand deficit. In conclusion, page 32 of the current WCS has made a number of recommendations. One of which is 'consider the contribution to water resource management that can be made through spatial planning, in particular when the revised building regulations emerge consider using optional building regulations requiring greater water efficiency'.

Core Policy 40 sets out how the spatial strategy within the Plan will respond to the pressures of climate change. The supporting text to Core Policy 40 (Paragraph 6.101) accepts the Vale is in a water stressed area. It indicates the Vale of White Horse will apply a higher level of water efficiency standard, however this will only be formalised within Local Plan 2031 Part 2, at a later date.

We are of the opinion that, when taking account of the above evidence base, this policy is not justified, in so far as it does not reflect the evidence base documents of the Plan. Given that the Local Plan Part 1 will allocate a significant proportion of the growth within the district, and development may come forward prior to the adoption of the Local Plan Part 2. There will be no mechanism to deliver such water efficiency measures in this scenario.

Q5 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 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.

We recommend Core Policy 40 is revised to ensure higher water efficiency standards are delivered within the strategic growth allocated within the Local Plan Part 1. As such we recommend the following inclusions:

vii New developments shall be designed to a water efficiency standard of 105 litres/head/day (l/h/d) for new homes, and BREEAM (BRE Environmental Assessment Method) 'Excellent' with a maximum number of 'water credits' or equivalent.