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19th December 2014

**By email only**

Dear Sir or Madam,

**Re: Vale of White Horse Local Plan 2031 Part One: Strategic Sites and Policies  
November 2014 consultation**

Thank you for consulting the Berks, Bucks and Oxon Wildlife Trust (BBOWT) on the above documents. Unfortunately at this stage we are concerned that the plan is **unsound** in relation to:

1. North of Shrivenham Development site – lack of assessment of impacts upon Tuckmill Meadows SSSI.
2. Habitat Regulations Assessment for Oxford Meadows SAC – lack of clarity regarding potential impact on air quality.

Please see below for further information on the above points along with other comments.

**North of Shrivenham Site Development template**

The allocated site at North of Shrivenham lies directly adjacent to Tuckmill Meadows SSSI. We are very concerned that there is a significant risk of hydrological and recreational impacts to the SSSI from a development in this location.

Hydrological impacts - Without any assessment of the potential hydrological impacts to the SSSI from this development the Plan is **unsound** as it cannot be demonstrated that appropriate mitigation measures could be secured to enable the delivery of the allocation if impacts are

identified. Assessment needs to be carried out to inform the decision as to whether to include this site.

Recreational impacts – The site development template must be updated to include a requirement that it must be demonstrated that there will be no recreational impact on the SSSI from development in this location.

### **Habitat Regulations Assessment – Air quality at Oxford Meadows SAC**

The HRA identifies that there may be an impact upon air quality at Oxford Meadows SAC 'in combination' with other plans and projects, but the outcomes of the strategic study on this by the Oxfordshire Planning Policy Group has not been reported yet. Therefore, as a precaution in the absence of this data, strategic mitigation measures have been incorporated into the Local Plan. In addition, Policy 34 of the Local Plan requires the Council to develop an air quality monitoring framework to monitor any impact on the SAC. However the policy goes no further in requiring remedial action should this monitoring indicate that the strategic mitigation measures in place through this Local Plan are not sufficient and there is a continued effect on the air quality at Oxford Meadows SAC. The HRA states that: *"The Council should supplement this [collaborative working with the Oxfordshire Planning Policy Group] via a plan commitment (...) to develop a framework by which air quality measures can be linked to monitoring of the air quality in the Oxford Meadows SAC before and for a number of years after introduction of the measures such that further measures can be devised if the air quality does not improve."* As stated above, the local plan has not secured a commitment to such further measures as recommended in the HRA should the monitoring indicate that there is an impact on air quality. In addition, the recommendations of the HRA do not go far enough as to identify what such 'further measures' would be and if they would be effective should they be required to rectify impacts upon the SAC. For the Local Plan to be sound Policy 34 needs to include a commitment to further mitigation measures should the monitoring indicate an effect on the SAC, and such mitigation measures need to be identified and demonstrably effective.

We would welcome the opportunity to discuss the above matter further with the Council prior to submission of the Local Plan to clarify the conclusions of the HRA and how these recommendations have been incorporated into the Local Plan.

## **Further comments**

### **Core Policy 45: Green Infrastructure**

We are pleased that the Council has commissioned a joint Green Infrastructure Strategy with South Oxfordshire District Council and that within Policy 45 there is a requirement for all new development to provide adequate GI that will provide a net gain for biodiversity. BBOWT would like to be consulted on the development of the GI strategy to ensure biodiversity benefits are secured.

### **Site Development Templates**

#### North of Abingdon-on-Thames

The site proposed north of Abingdon-on-Thames lies adjacent to an ancient woodland, Blake's Oak that has not been identified in the Site Development Template. This ancient woodland should be identified on the template and it should be acknowledged in the requirements for the site that appropriate buffers around the ancient woodland should be applied to ensure there are no impacts from the proposed adjacent development site.

#### Land South of East Hanney

The eastern land parcel included in the site proposed south of East Hanney qualifies as Traditional Orchard priority habitat.

Policy 46: Conservation and Improvement of Biodiversity of The VOWH Local Plan Part One states:

*"Development likely to result in the loss, deterioration or harm to habitats or species of importance to biodiversity (...) either directly or indirectly, will not be permitted unless:*

- i. the need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity interest;*
- ii. it can be demonstrated that it could not reasonably be located on an alternative site that would result in less or no harm to the biodiversity interests; and*
- iii. measures can be provided (and secured through planning conditions or legal agreements), that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development."*

Any proposed development at this site must avoid built development on the area of priority habitat. In addition, appropriate buffers from built development should be incorporated into a scheme and a long-term management strategy for the restoration of this habitat should be secured. The site development template within the Local Plan should be updated to secure these requirements.

Appropriate buffers to protect the Letcombe Brook from impacts of development should be secured along with a long-term management strategy for this priority habitat.

Thank you again for consulting us. If you have any queries please do not hesitate to get in touch.

Yours Sincerely,

Penny Silverwood

**Conservation Officer**