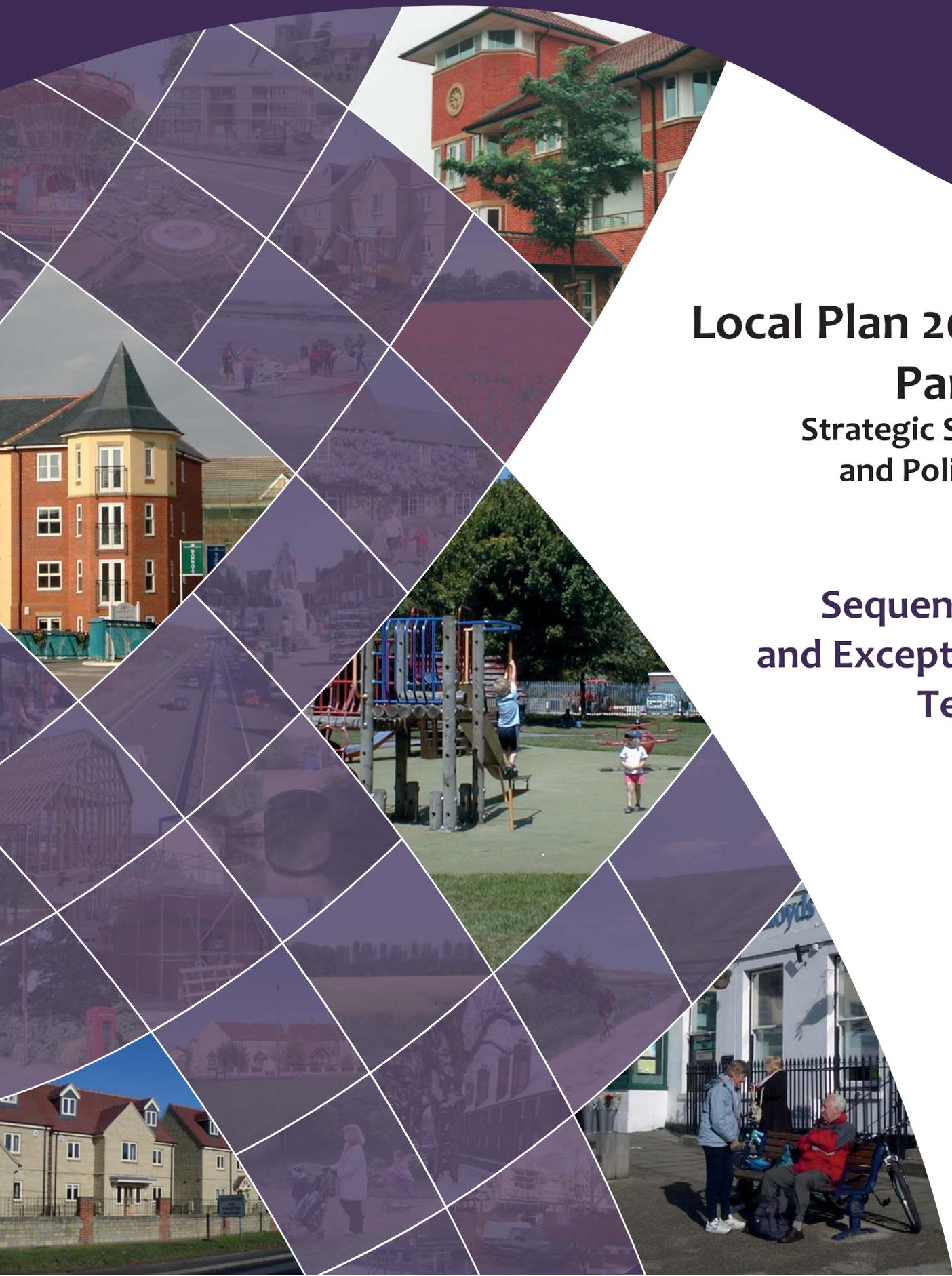




**Vale
of White Horse**
District Council

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Local Plan 2031

Part 1

Strategic Sites and Policies

Sequential and Exception Tests

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1.0 Introduction

- 1.1 This document includes the Sequential Test and Exception Test for the sites to be allocated in the Vale of White Horse Local Plan 2031 Part 1. The purpose of the Sequential Test is to ensure that development is directed towards areas with the lowest probability of flooding. This is done by first directing development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, then development should be directed to sites in Flood Zone 2, followed finally by Flood Zone 3.
- 1.2 All of the sites allocated in the Local Plan 2031 Part 1 are located in Flood Zone 1, though some of the sites have small areas of Flood Zone 2 or 3 within them. The purpose of this document is to assess whether the sites with Flood Zone 2 or 3 within them are the best available in flood risk terms and whether there are any reasonably available sites with lower flood risk. The reasonably available sites are assessed on a settlement by settlement basis because the Local Plan aims to allocate development sites in and around existing settlements to maximise sustainability benefits.
- 1.3 This Sequential Test seeks to incorporate the national requirements contained in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) and guidance published by the Environment Agency. At a more local level it incorporates the findings of the Oxfordshire Local Flood Risk Management Strategy, the Strategic Flood Risk Assessment (SFRA) from 2013 and the SFRA Addendum from 2014 and the Sustainability Appraisal for the Local Plan 2031 Part 1: Strategic Sites and Policies.

National Planning Policy Framework (NPPF)¹

- 1.4 Paragraph 100 of the NPPF states that:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere... Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage residual flood risk...”

- 1.5 Paragraph 101 states that:

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

“The aim of the Sequential Test is to steer new development to areas with the lowest probably of flooding. Development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower probability of flooding...”

1.6 Regarding the Exception Test, paragraph 102 states that:

“If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and*
- A site-specific flood risk assessment must be demonstrated that the development will be safe for its lifetime taking account of the vulnerability of users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.”*

National Planning Practice Guidance (NPPG)²

1.7 This guidance sets out a recommended approach to assessing flood risk, including application of the Sequential Test. It recommends 3 main processes as follows –

- Assess flood risk
- Avoid flood risk
- Manage and mitigate flood risk

1.8 Para 7-019-20140306 Aim of the Sequential Test:

“The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the Test. The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only

² <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required”.

Environment Agency Guidance³

- 1.9 This guidance sets out a recommended approach to carrying out Sequential Tests. The first stage is to identify the geographical area of search over which the test has been applied. Then it is necessary to identify the source of ‘reasonably available’ alternative sites from the evidence base eg the Strategic Housing Land Availability Assessment (SHLAA).
- 1.10 The method used for comparing flood risk between sites needs to be identified, and in this case it is a combination of the Environment Agency Flood Map and the Strategic Flood Risk Assessment (SFRA).
- 1.11 Sites should be compared in relation to
- flood risk;
 - Local Plan status;
 - capacity; and
 - constraints to delivery including -
 - availability;
 - policy restrictions;
 - physical problems or limitations;
 - potential impacts of the development; and
 - future environmental conditions that would be experienced by the inhabitants of the development.

Oxfordshire Local Flood Risk Management Strategy 2014⁴

- 1.12 A draft of this document was out for public consultation between June and September 2014. The High Level Objectives of the Strategy are as follows –

³ http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/static/documents/Sequential_test_process_4.pdf

⁴ www.oxfordshire.gov.uk

- i. Improve understanding of flood risks and ensure that all stakeholders understand their roles and responsibilities for flood risk management.
- ii. Take a collaborative approach to reducing flood risks, using all available resources and funds in an integrated way and in so doing derive enhanced overall benefit.
- iii. Prevent an increase in flood risk from development where possible, by preventing additional flow entering existing drainage systems and watercourses.
- iv. Take a sustainable and holistic approach to flood risk management, seeking to deliver wider environmental and social benefits, climate change mitigation and improvements under the Water Framework Directive.

1.13 Vale of White Horse District Council is represented on the Oxfordshire Strategic Flooding Group and has its own South Oxfordshire and Vale of White Horse Flood Group.

Strategic Flood Risk Assessment 2013 and Addendum 2014⁵

1.14 A Strategic Flood Risk Assessment was carried out for Vale of White Horse and South Oxfordshire in 2013. This assessed the flood risk associated with a number of sites proposed for allocation. An addendum was also published, which includes a number of additional sites. These assessments, along with the Environment Agency Flood Map have been used to undertake this Sequential Test. For each of the sites a number of implications for development were identified and these are included below for the sites assessed in this test.

Sustainability Appraisal 2014⁶

1.15 The Sustainability Appraisal (SA) for the Local Plan identified 11 Sustainability Objectives, against which the Plan was assessed. The main objective that relates to flood risk is Sustainability Objective 11: Increase resilience to climate change and flooding.

1.16 In applying Objective 11 the following sustainability issues were considered -

- Reduction and prevention of flooding.
- Action to mitigate the causes and adapt to the effects of climate change.

1.17 The appraisal questions for this objective were, does the alternative

⁵ www.whitehorsedc.gov.uk/evidence

⁶ www.whitehorsedc.gov.uk/evidence

- Minimise and reduce flood risk to people and property;
- Respond to the likelihood of future warmer summers, wetter winters, and more extreme weather events;
- Minimise development on high quality agricultural land;
- Provide for local needs locally?

2.0 The Spatial Strategy and Choosing Sites

- 2.1 The Strategic Housing Market Assessment 2014 objectively assessed housing requirement to inform the setting of local plan housing targets for each of the Oxfordshire authorities. For the Vale of White Horse the requirement was 20,560 homes 2011-2031, which was significantly higher than the housing target planned for under the South East Plan.
- 2.2 In order to meet this housing target and to give the District Council the best chance of delivering the housing required, it is necessary to spread the growth across many different sites in many different locations across the district. Potential sites were identified across the district in the most recent Strategic Housing Land Availability Assessment (SHLAA), published in February 2014⁷. This assessed land around the towns, service centres and larger villages for their availability, suitability and viability for development.
- 2.3 The three strands to the spatial strategy for the Vale district until 2031 are:
- i. **to focus sustainable growth within the Science Vale Oxford area** – focusing the majority of housing development in the South East Vale sub area around Didcot and Harwell Oxford Campus.
 - ii. **to reinforce the service centre roles of the main settlements** – concentrating housing growth to the main towns and service centres of Abingdon-on-Thames, Wantage, Grove, Botley and Faringdon
 - iii. **to promote thriving villages and rural communities** – allocating some strategic development to the larger villages including East Hanney, Harwell, Kennington, Kingston Bagpuize with Southmoor, Radley, Shrivenham, Stanford in the Vale and Sutton Courtenay.
- 2.4 In order to meet this spatial strategy and deliver the housing target, the District Council used the SHLAA to review the land around the towns, service centres and larger villages to ascertain sites that could accommodate 200 dwellings or more to allocate as strategic sites. The sites from this list went through several phases of testing to screen out those sites that were not suitable due to various constraints. One of the key constraints that the council screened out were sites located in Flood Zone 2 or 3. Sites with only a small area of Flood Zone 2 or 3 were kept in where the net site area in Flood Zone 1 would be large enough to accommodate 200+ dwellings.

⁷ www.whitehorsedc.gov.uk/evidence

- 2.5 The list of sites remaining enables the council to meet its housing target whilst remaining consistent with the spatial strategy, evidence base and definitions of sustainable development. There are very few, suitable alternative sites to those suggested for allocation.
- 2.6 In order to meet the housing targets, and to allow for development in the most sustainable locations, the District Council has undertaken a Green Belt Review to consider opportunities for development in the Oxford Green Belt. The Council is also proposing to allocate some sites in the North Wessex Downs Area of Outstanding Natural Beauty (AONB).

Sites proposed for allocation

- 2.7 The following allocated sites are contained entirely within Flood Zone 1, as identified by the latest Flood Maps from the Environment Agency:
- South Kennington
 - North West Radley
 - East Sutton Courtenay
 - Kingston Bagpuize East
 - Milton Heights
 - West of Harwell
 - East of Harwell Campus
 - Didcot A Site
 - Crab Hill, Wantage
 - West Stanford in the Vale
 - South Faringdon
 - South West Faringdon
 - North Shrivenham
 - East of Coxwell Road, Faringdon
- 2.8 All of these sites are over 1 hectare in area and therefore will require a Flood Risk Assessment (FRA) to be submitted with any planning application. As part of the FRA a surface water drainage strategy will need to be produced to ensure flood risk is not increased by the introduction of impermeable surfaces. The FRA should be based on the Council's Strategic Flood Risk Assessment July 2013.
- 2.9 The following sites are located mostly in Flood Zone 1 but parts of the sites are located in Flood Zones 2 and 3:
- Valley Park
 - North West Valley Park
 - North of Abingdon
 - North West Abingdon
 - North of Harwell Campus
 - South of East Hanney

- Monks Farm, Grove
- South of Park Road, Faringdon

2.10 These sites will also require a Flood Risk Assessment and surface water drainage strategy to be submitted. This will need to include flood alleviation measures and incorporate Sustainable Urban Drainage Systems (SUDS). It will need to be based on the Council's Strategic Flood Risk Assessment of July 2013.

3.0 Valley Park and North West Valley Park

- 3.1 The majority of Valley Park and North West Valley Park are contained within Flood Zone 1. There are some sections on the northern boundary that are within Flood Zone 2 and 3.
- 3.2 The town of Didcot is located in South Oxfordshire. In the South Oxfordshire Core Strategy December 2012, Didcot is designated as a growth point. The vision for the Core Strategy states that *“Didcot will be a major centre in southern Oxfordshire, playing a key role in the Science Vale UK area and providing new housing and better services”*⁸.
- 3.3 To support the growth of Didcot in South Oxfordshire, the Vale also intends to allocate land around the west of the settlement, within its boundary. This means that the new residents can access the shops of facilities available in Didcot and the key employment sites in Didcot and the Enterprise Zones of Harwell Oxford and Milton Park. The Spatial Strategy in the Local Plan 2031 Part 1: Strategic Sites and Policies states that the Council will be focusing sustainable growth in Science Vale. Science Vale, across South and Vale is key to the delivery of the respective Local Plans and will be further supported by a focused Action Plan to support delivery.
- 3.4 The following sites have been identified as having potential for development around Didcot, in the Vale of White Horse district:
- Valley Park
 - North West Valley Park
 - South Valley Park
 - Didcot A
 - Didcot North
- 3.5 South Valley Park is contained entirely in Flood Zone 1. However, it should only be developed in conjunction with Valley Park because it would be remote from the settlement.
- 3.6 Didcot A is contained entirely in Flood Zone 1. Given the site’s proximity to Didcot B power station and the decontamination that will be required, the site will be most suitable for employment use. There may be some scope for residential development on the site.
- 3.7 Didcot North contains areas of Flood Zones 2 and 3. The site has been considered unsuitable for housing because of the long-term continuation of minerals extraction and the adjacent landfill site.

⁸ Page 21 www.southoxon.gov.uk/corestrategy

- 3.8 Valley Park is proposed for at least 2550 houses. There is a small area to the north in Flood Zones 2 and 3, which is at risk from fluvial flooding from the tributaries of Moor Ditch.
- 3.9 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

Valley Park

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to **minor negative** effects in terms of climate change and flooding. The site would result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- The area at risk of fluvial flooding was initially excluded from the site but discussions with the Environment Agency concluded that it would be more beneficial to enhance the amenity value of this land as part of the development. It has been included on the understanding that the built development will all be within Flood Zone 1.
- Requires a full FRA for a site in Flood Zone 3.
- The FRA should demonstrate that the development will not be at risk from the small watercourses crossing the site, taking into account the effects of potential blockage of the culverts, though detailed modelling if necessary. The location of existing drains and watercourses should be preserved.
- FRA should include a detailed assessment of groundwater flood risk.
- It must be demonstrated that the site will be designed sequentially ensuring all development will be outside of Flood Zone 2 with climate change, and any flood risk areas or flow routes defined by modelling of small watercourses and groundwater investigation.
- It must be demonstrated that safe, dry access and egress will be available during a severe flood event.
- Opportunities for enhancing the amenity value of the Flood Zone area.
- Drainage strategy should be submitted at an early stage to cover mitigation of any surface water risk and reduce impact downstream through site design and SuDS methods.
- Thames Water should be consulted at an early stage to ensure that there will be sufficient capacity in the wastewater system and any upgrades are carried out where necessary.

- 3.10 North West Valley Park is allocated for 800 houses. It also has a small area to the north in Flood Zones 2 and 3 which is at risk from fluvial flooding from the tributaries of Moor Ditch.
- 3.11 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

North West Valley Park

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to **neutral effects** in terms of climate change and flooding. The site would not result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site in Flood Zone 3.
- The FRA should demonstrate that the development will not be at risk from the small watercourses crossing the site, taking into account the effects of potential blockage of the culverts, though detailed modelling if necessary. The location of existing drains and watercourses should be preserved.
- FRA should include a detailed assessment of groundwater flood risk.
- It must be demonstrated that the site will be designed sequentially ensuring all development will be outside of Flood Zone 2 with climate change, and any flood risk areas or flow routes defined by modelling of small watercourses and groundwater investigation.
- It must be demonstrated that safe, dry access and egress will be available during a severe flood event.

- 3.12 Owing to the majority of both of these sites being located in Flood Zone 1 there would be no need to develop in Flood Zones 2 or 3. SUDS could be used within the development to minimise any further surface water run off that might impact on the areas within Flood Zones 2 and 3.
- 3.13 **There are no alternative sites around Didcot in areas of lower flood risk and therefore the sequential test has been passed for Valley Park and North West Valley Park.**

4.0 North of Abingdon and North West Abingdon

- 4.1 Abingdon is the largest settlement in the district with the greatest housing need. However, the growth of Abingdon is constrained by the River Thames and its flood zone to the south and south east, highway capacity to the south and Green Belt to the north, north west and north east and the A34 to the west. The River Thames and the A34 are obviously immovable physical barriers therefore the only options that could be considered are the south and the north, north west and north east.
- 4.2 In assessing suitable sites for further development, the council has undertaken a Green Belt Review. The Review assessed land against the five purposes of Green Belt, as set out in paragraph 80 of the National Planning Policy Framework, and suggests sites that less effectively meet these purposes and therefore could be released from the Green Belt.
- 4.3 The Green Belt Review suggested that land to the north and north west of Abingdon is less effective at meeting the purposes of the Green Belt and could therefore be released. It found that land to the north east of Abingdon was important to remain open to prevent coalescence with Radley and to maintain the open landscape leading towards the River Thames.
- 4.4 On this basis, the sites that have been assessed around Abingdon, as potentially suitable for development are:
- South Abingdon
 - North of Abingdon
 - North West Abingdon
- 4.5 South Abingdon is not suitable for further development because of highway capacity issues. If further strategic development were to happen in South Abingdon it would necessitate a new river crossing and by-pass of the town. Such a road could not be funded without a significant amount of development in the area. Therefore it is not considered suitable for development in this plan period. South Abingdon also contains areas in Flood Zone 2.
- 4.6 The Green Belt Review assessed land around the north and north east of Abingdon. Land to the north east of the settlement was not considered to be suitable for release from the Green Belt because it was important for maintaining the River Thames landscape and in maintaining separation between Radley and Abingdon. The land to the north of the settlement represents the area that is of least importance to meeting the five purposes of the Green Belt. This site provides 800 dwellings, which is not enough new dwellings to provide a suitable amount of Affordable Housing in an area of the greatest need. On this

basis, North West Abingdon is also needed to provide a suitable level of growth for the district's largest town.

- 4.7 North of Abingdon is proposed for 800 houses and contains small areas in Flood Risk Zones 2 and 3.
- 4.8 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

North of Abingdon

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to **neutral effects** in terms of climate change and flooding. The site could result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site in Flood Zone 3.
- The FRA should demonstrate that the development will not be at risk from the small watercourses crossing the site, taking into account the effects of potential blockage of the culverts, though detailed modelling if necessary. The location of existing drains and watercourses should be preserved.
- FRA should include a detailed assessment of groundwater flood risk.
- It must be demonstrated that the site will be designed sequentially ensuring all development will be outside of Flood Zone 2 with climate change, and any flood risk areas or flow routes defined by modelling of small watercourses and groundwater investigation.
- It must be demonstrated that safe, dry access and egress will be available during a severe flood event.

- 4.9 Development on the site will be sequentially located so that it is contained within the areas within Flood Zone 1 with no development taking place in Flood Zones 2 and 3. SUDS can be used on the site to avoid additional run off to the areas in Flood Zones 3 and 3.
- 4.10 North West Abingdon is all in Flood Zone 1, but immediately adjacent to areas of Zones 2 and 3. The proposal is for 200 dwellings.
- 4.11 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

North West Abingdon

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to **minor negative** effects in terms of climate change and flooding. The site would result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site >1ha in Flood Zone 1.
- Drainage strategy should be submitted at an early stage to cover mitigation of any surface water risk and reduce impact downstream through site design and SuDS methods.
- Thames Water should be consulted at an early stage to ensure that there will be sufficient capacity in the wastewater system and any upgrades are carried out where necessary.

4.12 Development in North West Abingdon will be entirely within Flood Zone 1 and SUDS will be used to prevent impacts on the adjacent areas of Flood Zones 2 and 3.

4.13 **There are no alternative sites around Abingdon in areas of lower flood risk and therefore the sequential test has been passed for North of Abingdon and North West Abingdon.**

5.0 North of Harwell Campus

- 5.1 Harwell Campus is one of the District's major employment sites and is in part designated as an Enterprise Zone. It has an international reputation as a location for science and technology innovation and houses over £1 billion of world-leading research infrastructure, including the European Space Agency and the synchrotron Diamond Light Source.
- 5.2 Science Vale has been identified as a strategic priority for growth by the Oxfordshire Local Enterprise Partnership in the Strategic Economic Plan. Homes need to be provided in the vicinity of the campus to support its economic development potential and the strategy for growth in the local plan. This would help to minimise the need to travel and ensure a sufficient local labour supply, enabling balanced employment and housing growth in the Science Vale Oxford area (the housing will also help fund the required infrastructure to enable the area's economic growth potential to be realised).
- 5.3 To the east of the campus is the A415, beyond which is an area of open land proposed for allocation in the Local Plan Part 1. In the February 2014 consultation the site was proposed for housing allocation with capacity for 1400 homes by 2031 plus longer term development potential. Following objection from the AONB Partnership, Natural England and English Heritage, the council undertook a more detailed Landscape and Visual Impact Assessment of the site, which highlighted the parts of the site that could be developed with minimal harmful impact on the AONB. This study found that the site could accommodate around 850 homes, which, with appropriate planting mitigation, would not be unacceptably harmful in this sensitive and high value landscape. As part of making up the full local plan housing requirement, and to offset the reduced housing proposal east of the campus, further land options including around the campus were assessed to accommodate the remaining units from the proposed allocation.
- 5.4 The entire campus is within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Development to the west of the campus would not be suitable because there it would not relate well to the campus due to its remoteness and a lack of direct access to the campus. Two of the sites assessed in the SHLAA had no obvious access points. Land to the south of the campus is remote from campus and the SHLAA assessment considered that it would be difficult to relate new development here to existing development on the site. Access was also considered to be poor and the site was to be highly sensitive in landscape terms.
- 5.5 Land to the north of the campus had been previously suggested for allocation in the February 2013 consultation document but had been

removed following a misunderstanding about its availability. During the February 2014 consultation it was confirmed to us that the site was still available for housing. This added 550 dwellings to the total for the campus to match the 1400 dwellings originally proposed. An assessment of the landscape impact of this northern Harwell Campus site on the land adjoining was undertaken in 2014. This recognised that there was a small stream to the north of the site, but that development on this location did not raise any significant issues in relation to flood risk management because there was sufficient land available to ensure it remained.

- 5.6 The site is largely in Flood Zone 1, with only a small area of the site adjacent to a minor watercourse within Flood Zone 3b functional floodplain. Building would be exclusively in Flood Zone 1.
- 5.7 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

North of Harwell Campus

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to **minor negative** effects in terms of climate change and flooding. The site would result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site in Flood Zone 3.
- The FRA should demonstrate that the development will not be at risk from the small watercourses crossing the site, taking into account the effects of potential blockage of the culverts, though detailed modelling if necessary. The location of existing drains and watercourses should be preserved.
- FRA should include a detailed assessment of groundwater flood risk.
- It must be demonstrated that the site will be designed sequentially ensuring all development will be outside of Flood Zone 2 with climate change, and any flood risk areas or flow routes defined by modelling of small watercourses and groundwater investigation.
- It must be demonstrated that safe, dry access and egress will be available during a severe flood event.

- 5.8 Development will be restricted to areas within Flood Zone 1. The use of SUDS should ensure that there is no additional run off to impact on the area within Flood Zone 3b.
- 5.9 **There are no more suitable sites around Harwell Campus and therefore the sequential test has been passed for North of Harwell Campus.**

6.0 South of East Hanney

- 6.1 East Hanney is one of the district's larger villages and is considered a sustainable place for some strategic growth to support the spatial strategy.
- 6.2 The village of East Hanney is mostly located to the west of the A338 though some growth has recently taken place to the east of the A338 and north of the Steventon Road. The area to the south of the Steventon Road, east of the A338 is largely open countryside. The majority of East Hanney is surrounded by Flood Zone 2 with land to the south east of the village in Flood Zone 1.
- 6.3 The Council had proposed land to the east of the A338 and south of the Steventon Road to be allocated as a strategic site in the Housing Delivery Update consultation (February 2014). In response to this consultation, East Hanney Parish Council suggested land to the west of the A338 and south of the Summertown Road as more suitable for allocation because it would better relate to the built form of the village and therefore should be developed in preference to extending the settlement across the A338 to the south of the Steventon Road.
- 6.4 The site suggested for development is almost entirely in Flood Zone 1 with a small strip of land on the western edge of the site in Flood Zone 2. On this basis, the site should not be ruled out for development, provided no development takes place on the land in Flood Zone 2.
- 6.5 As the site suggested by the Parish Council is one of the few sites available in East Hanney that is largely in Flood Zone 1, it should be utilised for development rather than considering sites in Flood Zone 2 or 3. The District Council agree that the site suggested by the Parish Council would be sequentially preferable to develop rather than spreading the village across the A338. It would provide sustainability benefits by being close to the existing village facilities.
- 6.6 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

South of East Hanney

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to a **neutral effect** in terms of climate change and flooding. The site could result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site in Flood Zone 3.
- It must be demonstrated that the site will be designed sequentially ensuring all development will be outside of Flood Zone 2 with climate change.
- It must be demonstrated that safe, dry access and egress will be available during a severe flood event from both sides of the site.
- Opportunities for enhancing the amenity value of the area within the Flood Zones, although the safety of users in the event of a flood should be paramount.
- The development must not increase existing flood risk downstream. A drainage strategy should be submitted at an early stage to cover mitigation of any surface water risk and reduce impact downstream through site design and SuDS methods. Runoff less than greenfield rates is desirable.

6.7 The South of East Hanney site is proposed for 200 homes, entirely located in Flood Zone 1. Whilst there is an alternative site to the east of the A338 which is entirely in Flood Zone 1 the Council considers that the South of Hanney site should have no more impact on Flood Zones 2 and 3 provided that SUDS schemes are implemented to manage surface water run off. Also the South of Hanney site is preferred by the local community and has benefits in terms of sustainability.

6.8 **There are no more suitable sites around East Hanney and therefore the sequential test has been passed for South of East Hanney.**

7.0 Monks Farm, Grove

- 7.1 Development to the south of Grove is restricted because it would coalesce Wantage and Grove. Development to the east of Grove would not be appropriate because the settlement is contained by the A338. Further development to the west of Grove is not appropriate because planning permission has been granted for a development of 2500 dwellings significantly expanding the entire western edge of the settlement (Grove Airfield).
- 7.2 Therefore development to the north of the settlement is the only place that it can expand.
- 7.3 The Letcombe Brook runs north-south through the site, creating a strip of Flood Zone 2 and 3 either side. Development will not take place in the Flood Zone 2 and 3 areas except for an access road known as the Northern Link Road. This road is necessary, not only to access the Monks Farm site, but also to provide access to the Grove Airfield development. The Strategic Flood Risk Assessment (SFRA) includes an increased scope assessment for this and provides advice that must be met as regards developing the site.
- 7.4 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

Monks Farm, Grove

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to **major negative** effects in terms of climate change and flooding. The site is on the flood plain. There are issues of on-site standing surface water”.*

Implications for development (increased scope assessment from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site in Flood Zone 3.
- It must be demonstrated that the site will be designed sequentially ensuring all development will be outside of Flood Zone 2 with climate change.
- It must be demonstrated that safe, dry access and egress will be available during a severe flood event from both sides of the site.
- Opportunities for enhancing the amenity value of the area within the Flood Zones, although the safety of users in the event of a flood should be paramount.
- The development must not increase existing flood risk downstream. A drainage strategy should be submitted at an early stage to cover mitigation of any surface water risk and reduce impact downstream through site design and SuDS methods. Runoff less than greenfield rates is desirable.
- Thames Water should be consulted at an early stage to ensure that there will be sufficient capacity in the wastewater system and any upgrades are carried out when necessary.
- An assessment of the impact of foul water discharge into the Letcombe Brook from Wantage STW should be completed, with mitigation if appropriate.

Implications for Grove Northern Link Road

- A bridge will be required across the Letcombe Brook as part of the Grove Northern Link Road project.
- The available modelling suggests that flows through the bridge will be around 14.1m³/s in a 100 year with climate change event, and 22.6m³/s in a 1000 year event. The natural floodplain is relatively wide here, and there are ecological considerations for this natural chalk stream. The road is therefore likely to require a wide span bridge having least possible impact on the natural floodplain.

7.5 Development on this site would be restricted to land within Flood Zone 1 with SUDS used to control run off to the areas of Flood Zones 2 and 3. The development of the new link road is likely to require a wide span bridge to have the least possible impact on the natural floodplain.

7.6 **There are no alternative sites around Grove in areas of lower flood risk and therefore the sequential test has been passed for Monks Farm.**

8.0 South of Park Road, Faringdon

- 8.1 Land to the north of Faringdon is not suitable for development because it is steeply sloping and because of its historic value in relation to Faringdon House and Faringdon Folly. The east of Faringdon is restricted from development by the A420. Land to the west of Faringdon is not suitable for development because of its landscape value. The remaining land to the south and south east of Faringdon is already allocated for development in the Local Plan 2031 Part 1.
- 8.2 Land South of Park Road has been the preferred site for development in Faringdon since the Preferred Options of the Core Strategy in 2010. At that time, the land around Faringdon was assessed and this site was found to be the most suitable for development. The site received resolution to grant planning permission in December 2013.
- 8.3 Only a very small section of the site, on the northern boundary, is located in Flood Zone 2 and Flood Zone 3 and therefore the majority of the site is suitable for development in flood risk terms. Development will not be located in the area of Flood Zone 2 or 3 and SUDs will be included to reduce the risk of flooding on the site generally and to prevent run-off from the developed area that could increase flood risk in Flood Zone 2 or 3.
- 8.4 The South of Park Road, Faringdon site is earmarked for a mixed use development, including 350 houses.
- 8.5 The following is a summary of information relating to the site in the Sustainability Appraisal and SFRA:

South of Park Road, Faringdon

Sustainability Appraisal – Sustainability Objective 11 assessment

*“The site was appraised to lead to a **minor negative** effect in terms of this objective due to the potential loss of Grade 2 and 3a land”.*

Implications for development (from Strategic Flood Risk Assessment 2013)

- Requires a full FRA for a site >1ha in Flood Zone 1.
- The FRA should demonstrate that the development will not be at risk from the small watercourse to the north of the site, taking into account the effects of potential blockage of the culvert, though detailed modelling if necessary.
- Drainage strategy should be submitted at an early stage to cover mitigation of any surface water risk and reduce impact downstream through site design and SUDS methods.
- Thames Water should be consulted at an early stage to ensure that there will be sufficient capacity in the wastewater system and any upgrades are carried out where necessary

8.6 There are no alternative sites around Faringdon in areas of lower flood risk and therefore the sequential test has been passed for South of Park Road, Faringdon.

9.0 Exception Test for Allocated Sites

- 9.1 Where allocated sites are likely to be in locations where they could impact on flooding, the NPPF paragraph 102 requires an Exception Test to be carried out to assess whether wider sustainability benefits outweigh flood risk and demonstrate that a development would be safe for its lifetime.
- 9.2 All 8 of the sites assessed for the Sequential Test, contain areas within Flood Zone 3, including one area within Flood Zone 3b (floodplain). Advice from the Environment Agency required an Exception Test to be undertaken for all sites like to affect Flood Zone 3, using the process proposed by the National Planning Practice Guidance¹⁰.
- 9.3 The guidance requires the Exceptions Test to be done in two stages –
- an assessment of whether the wider sustainability benefits of the development outweigh flood risk for the site.
 - an assessment of whether the development would be safe throughout its lifetime.
- 9.4 This assessment addresses the first of these tests, leaving the second test to be addressed through a site-specific flood risk assessment to be carried out by developers.
- 9.5 The assessment is based on the findings of the Sustainability Appraisal (SA)¹¹ carried out for the Vale of White Horse Local Plan 2031: Part 1. The SA was based on 11 objectives covering the social, economic and environmental aspects of sustainability. Objective 11 specifically related to the impacts on climate change and flooding. For one site, Valley Park, two different sites were assessed in the Sustainability Appraisal (sites 10 and 12), and these were later combined to form a single site for allocation in the Local Plan 2031 Part 1. As the area of flood risk is located to the north of the site, in site 12, and well away from site 10, the assessment for site 12 is used in the Exception Test.
- 9.6 The following tables comprise assessments drawn from the SA, which assess each site against the 11 SA objectives. Where necessary, additional comments are added for clarity. For each site the predicted impacts, both negative and positive are assessed against the impact on Objective 11 in relation to flooding. The tables finish with a conclusion as to whether the site passes the Exception Test and should be included in the Local Plan 2031: Part 1.

¹⁰ NPPG Reference ID: 7-024-20140306

¹¹ www.whitehorsedc.gov.uk/evidence

Valley Park (assessed as Site 12 – at least 2,550 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
1. Provide sufficient suitable homes including affordable homes.	The site was appraised to lead to major positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.	This site needs to be included in the Local Plan Part 1 if the district housing target is to be met. There are no suitable alternative sites in the local area.
2. Availability of services and facilities in towns and rural areas.	The site was appraised to lead to major positive effects in terms of availability of services and facilities. The site has good access to local community centre, a Primary School, local shops, a secondary school and a GP, access to a Leisure Centre is not as good	
3. Reduce the need to travel and promote sustainable transport	The site was appraised to lead to major positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Didcot town centre and bus routes	
4. Improve health and well-being.	The site was appraised to lead to neutral effects in terms of health and well-being. The site has fairly good access to a GP, open space and Leisure Centre however none of them are in walking distance.	
5. Reduce inequality, poverty and social exclusion.	The site was appraised to lead to neutral effects as it has good access to a primary and secondary school	

6. Support a strong and sustainable economy	The site was appraised to lead to major positive effects in terms of the economy as it is well-located for access to employment sites and Didcot town centre.	
7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a neutral effect in terms of the natural environment.	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.
8. Cultural heritage, townscape and landscape.	The site was appraised to neutral effect in terms of cultural heritage, townscape and landscape. The site has a high landscape capacity. It is in close proximity to an historic landscape character area	Development should retain the historic field pattern, tree belts and hedgerows within the site. Addressed by the Site Templates, Landscape, AONB and green infrastructure policies.
9. Reduce air, noise and light pollution	The site was appraised to have a minor negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan.	
10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	

11. Increase resilience to climate change and flooding	The site was appraised to lead to minor positive effects in terms of climate change and flooding. The site would not result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.	The small area of the site in Flood Zone 3 will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The sequential test established that there were no alternative sites in the area to the west of Didcot.
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Conclusion – The restriction of development to land in Flood Zone 1 will ensure that there would not be an impact on flooding and this would lead to a minor positive impact under SA Objective 11. Sustainability benefits will be increased by the predicted major positive impacts on the provision of homes, the availability of services, sustainable transport and the local economy. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

North West of Valley Park (800 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
1. Provide sufficient suitable homes including affordable homes.	The site was appraised to lead to major positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.	This site needs to be included in the Local Plan Part 1 if the district housing target is to be met. There are no suitable alternative sites in the local area.

2. Availability of services and facilities in towns and rural areas.	The site was appraised to lead to major positive effects in terms of availability of services and facilities. The site has good access to local community centre, a Primary School, local shops, a GP, Leisure Centre and a secondary school	
3. Reduce the need to travel and promote sustainable transport	The site was appraised to lead to major positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Didcot town centre and bus routes	
4. Improve health and well-being.	The site was appraised to lead to neutral effects in terms of health and well-being. The site has reasonably good access open space however slightly further away from a Leisure Centre and the nearest GP	
5. Reduce inequality, poverty and social exclusion.	The site was appraised to lead to minor negative effects as no schools are within walking distance.	
6. Support a strong and sustainable economy	The site was appraised to lead to major positive effects in terms of the economy as it is well-located for access to employment sites and Abingdon town centre.	
7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a neutral effect in terms of the natural environment.	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.

8. Cultural heritage, townscape and landscape.	The site was appraised to have a neutral effect in terms of cultural heritage, townscape and landscape. The site has a high landscape capacity	Development should retain the historic field pattern, tree belts and hedgerows within the site. Addressed by the Site Templates, Landscape, AONB and green infrastructure policies.
9. Reduce air, noise and light pollution	The site was appraised to have a minor negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan.	
10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	Studies should be undertaken to ascertain whether the site would lead to overloading of infrastructure. Additional wastewater infrastructure may be required to support the development.
11. Increase resilience to climate change and flooding	The site was appraised to lead to neutral effects in terms of climate change and flooding. The site would not result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.	The small area of the site in Flood Zone 3 will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The sequential test established that there were no alternative sites in the area to the west of Didcot.

Conclusion – The restriction of development to land in Flood Zone 1 will ensure that there would not be an impact on flooding and the effects would be neutral under SA Objective 11. Sustainability benefits will be increased by the predicted major positive impacts on the provision of homes, the availability of services, sustainable transport and the local economy. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

North Abingdon on Thames (800 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
1. Provide sufficient suitable homes including affordable homes.	The site was appraised to lead to major positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.	This site needs to be included in the Local Plan Part 1 if the district housing target is to be met. There are no suitable alternative sites in the local area.
2. Availability of services and facilities in towns and rural areas.	The site was appraised to lead to major positive effects in terms of availability of services and facilities. The site has good access to local community centre, a Primary School, local shops, and a GP, however access to a Leisure Centre and a secondary school is not as good	
3. Reduce the need to travel and promote sustainable transport	The site was appraised to lead to major positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Abingdon town centre and bus routes.	

4. Improve health and well-being.	The site was appraised to lead to minor positive effects in terms of health and well-being. The site has reasonably good access to a GP, open space and Leisure Centre	
5. Reduce inequality, poverty and social exclusion.	The site was appraised to lead to minor positive effects as it has good access to a primary however some distance from a secondary school.	
6. Support a strong and sustainable economy	The site was appraised to lead to major positive effects in terms of the economy as it is well-located for access to employment sites and Abingdon town centre.	
7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a neutral effect in terms of the natural environment.	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.
8. Cultural heritage, townscape and landscape.	The site was appraised to have a minor negative effect in terms of cultural heritage, townscape and landscape.	Development should retain the historic field pattern, tree belts and hedgerows within the site. Addressed by the Site Templates, Landscape and Green Infrastructure.
9. Reduce air, noise and light pollution	The site was appraised to have a minor negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan	

10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	
11. Increase resilience to climate change and flooding	The site was appraised to lead to neutral effects in terms of climate change and flooding. The site could result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.	The small area of the site in Flood Zone 3 will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The sequential test established that there were no alternative sites in the area around Abingdon.

Conclusion – The restriction of development to land in Flood Zone 1 will ensure that there would not be an impact on flooding and the effects would be neutral under SA Objective 11. Sustainability benefits will be increased by the predicted major positive impacts on the provision of homes, the availability of services, sustainable transport and the local economy. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

North West Abingdon on Thames (200 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
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<p>1. Provide sufficient suitable homes including affordable homes.</p>	<p>The site was appraised to lead to minor positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.</p>	<p>This site needs to be included in the Local Plan Part 1 in addition to North of Abingdon if the district housing target is to be met. There are no suitable alternative sites in the local area.</p>
<p>2. Availability of services and facilities in towns and rural areas.</p>	<p>The site was appraised to lead to major positive effects in terms of availability of services and facilities. The site has good access to local shops, a community centre, a primary school, secondary school, town centre and GP; however access to a Leisure Centre is not as good.</p>	
<p>3. Reduce the need to travel and promote sustainable transport</p>	<p>The site was appraised to lead to minor positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Abingdon town centre and bus routes.</p>	
<p>4. Improve health and well-being.</p>	<p>The site was appraised to lead to minor positive effects in terms of health and well-being. The site has reasonably good access to a GP, open space and Leisure Centre.</p>	
<p>5. Reduce inequality, poverty and social exclusion.</p>	<p>The site was appraised to lead to major positive effects as it has good access to a primary and secondary school.</p>	
<p>6. Support a strong and sustainable economy</p>	<p>The site was appraised to lead to major positive effects in terms of the economy as it is well-located for access to employment sites and Abingdon town centre.</p>	

7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a neutral effect in terms of the natural environment.	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.
8. Cultural heritage, townscape and landscape.	The site was appraised to have a neutral effect in terms of cultural heritage, townscape and landscape. The site has a high landscape capacity.	Development should retain the historic field pattern, tree belts and hedgerows within the site. Addressed by the Site Templates, Landscape and Green Infrastructure.
9. Reduce air, noise and light pollution	The site was appraised to have a minor negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan.	
10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	Studies should be undertaken to ascertain whether the site would lead to overloading of infrastructure. Additional wastewater infrastructure may be required to support the development.

11. Increase resilience to climate change and flooding	The site was appraised to lead to minor negative effects in terms of climate change and flooding. The site would result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.	The small area of the site in Flood Zone 3 immediately adjacent to the site will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The sequential test established that there were no alternative sites in the area around Abingdon.
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Conclusion – The restriction of development to land in Flood Zone 1 will ensure that there would only be a minor negative impact under SA Objective 11. This will clearly be outweighed by the predicted major positive impacts on the availability of services reducing inequality and the local economy. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

North Harwell Campus (550 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
1. Provide sufficient suitable homes including affordable homes.	The site was appraised to lead to minor positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.	This site needs to be included in the Local Plan Part 1 in addition to the site to the east of the campus if the district housing target is to be met. There are no suitable alternative sites in the local area.

2. Availability of services and facilities in towns and rural areas.	The site was appraised to lead to minor positive effects in terms of availability of services and facilities. The site has good access to local community centre, a Primary School, and local shops, however access to a Leisure Centre, a GP and a secondary school is not as good	
3. Reduce the need to travel and promote sustainable transport	The site was appraised to lead to major positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Abingdon town centre and bus routes	
4. Improve health and well-being.	The site was appraised to lead to major negative effects in terms of health and well-being. The site has reasonably poor access to a GP, open space and Leisure Centre	The negative impacts would be due to the lack of a leisure centre and access to GPs, and the location within a rural area. The SA recognised that there was potential for positive benefits to the 'living environment' by delivering on-site open space and contributing to health infrastructure.
5. Reduce inequality, poverty and social exclusion.	The site was appraised to lead to minor negative effects as it is not in walking distance to a primary or secondary school	
6. Support a strong and sustainable economy	The site was appraised to lead to major positive effects in terms of the economy as it is well-located for access to employment sites and Didcot town centre	
7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a neutral effect in terms of the natural environment.	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.

8. Cultural heritage, townscape and landscape.	The site was appraised to have a minor negative effect in terms of cultural heritage, townscape and landscape. The site has a medium/low landscape capacity and is within the AONB.	Development should retain the historic field pattern, tree belts and hedgerows within the site. Early screening should be planted and mitigation in the Harwell LVIA followed. Addressed by the Site Templates, Landscape, AONB and Green infrastructure policies.
9. Reduce air, noise and light pollution	The site was appraised to have a major negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan. Any development would have a significant impact on the tranquillity on the AONB.	Noise barriers may be required. Mitigation outlined in the Harwell LVIA should be followed. Addressed by the Site Templates, noise pollution, AONB and supporting infrastructure policy. Impacts on the tranquillity of the AONB will need to be managed.
10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	Studies should be undertaken to ascertain whether the site would lead to overloading of infrastructure. Additional wastewater infrastructure may be required to support the development.
11. Increase resilience to climate change and flooding	The site was appraised to lead to minor negative effects in terms of climate change and flooding. The site would result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.	The small area of the site in Flood Zone 3 within the site will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The sequential test established that there were no alternative sites in the area around the Harwell Campus.

Conclusion – The restriction of development to land in Flood Zone 1 will ensure that there would only be a minor negative impact under SA Objective 11. This will clearly be outweighed by the predicted major positive impacts on sustainable transport and the local economy. There would, however, be potential major negative impacts on health and well-being, and pollution, which would need to be mitigated. Assuming these benefits can be mitigated and in view of the additional positive benefits to housing supply and local services, the Council considers that the positive benefits of development would outweigh the minor negative effects in terms of climate change and flooding. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

South of East Hanney (200 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
1. Provide sufficient suitable homes including affordable homes.	The site was appraised to lead to minor positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.	This site needs to be included in the Local Plan Part 1 if the district housing target is to be met. There is an alternative site to the East of East Hanney, but the Parish Council wished this site to be included due to sustainability benefits, such as access to services.
2. Availability of services and facilities in towns and rural areas.	The site was appraised to lead to minor positive effects in terms of availability of services and facilities. The site has good access to local community centre, a Primary School, and local shops, however access to a Leisure Centre, a GP and a secondary school is not as good	

3. Reduce the need to travel and promote sustainable transport	The site was appraised to lead to minor positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Abingdon town centre and bus routes	
4. Improve health and well-being.	The site was appraised to lead to neutral effects in terms of health and well-being. The site has reasonably good access to open space however the GP and Leisure Centre are not within walking distance	
5. Reduce inequality, poverty and social exclusion.	The site was appraised to lead to neutral effects as it has good access to a primary and secondary school	
6. Support a strong and sustainable economy	The site was appraised to lead to minor positive effects in terms of the economy as it is well-located for access to employment sites and Wantage town centre.	
7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a major negative effect in terms of the natural environment. It is in close proximity to an important wildlife corridor.	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.
8. Cultural heritage, townscape and landscape.	The site was appraised to have a major negative effect in terms of cultural heritage, townscape and landscape. It is in close proximity to a listed building and development would lead to visual impacts to the wider landscape	Development should retain the historic field pattern, tree belts and hedgerows within the site. Addressed by the Site Templates, Landscape and Green Infrastructure.

9. Reduce air, noise and light pollution	The site was appraised to have a minor negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan.	
10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	Studies should be undertaken to ascertain whether the site would lead to overloading of infrastructure. Additional wastewater infrastructure may be required to support the development.
11. Increase resilience to climate change and flooding	The site was appraised to lead to a neutral effect in terms of climate change and flooding. The site could result in the loss of the Best and Most Versatile Agricultural Land. The site contains a small area of flood risk and is required to undergo a site-specific flood risk assessment in order to ensure flood risk is not increased.	The small area of the site in Flood Zone 3 within the site will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The sequential test established that this was an appropriate site to allocate adjacent to East Hanney.

Conclusion – The restriction of development to land in Flood Zone 1 will ensure that there would not be an impact on flooding and the effects would be neutral under SA Objective 11. Sustainability benefits will be increased by the predicted minor positive impacts on the provision of homes, the availability of services, sustainable transport and the local economy. Whilst there are potentially major negative effects on the natural and built heritage, the Council considers that these could be mitigated through a masterplanning process and keeping development away from key features. On balance, the Council considers that this site could, overall, have a positive impact on wider sustainability issues. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

Monks Farm, Grove (750 homes)

SA Objective	Commentary from Sustainability Assessment	Other Comments
1. Provide sufficient suitable homes including affordable homes.	The site was appraised to lead to major positive effects in terms of housing through delivering a number of homes in an accessible edge of town location, which would contribute towards meeting both market and affordable housing need in the district.	This site needs to be included in the Local Plan Part 1 if the district housing target is to be met. There are no suitable alternative sites in the local area.
2. Availability of services and facilities in towns and rural areas.	The site was appraised to lead to minor positive effects in terms of availability of services and facilities. The site is cycling distance from town centre services but is accessible by existing bus services. Local facilities available in Grove	
3. Reduce the need to travel and promote sustainable transport	The site was appraised to lead to minor positive effects in terms of reducing the need to travel and promoting sustainable transport. The site has reasonably good access to shops and services, Wantage town centre and bus routes	

4. Improve health and well-being.	The site was appraised to lead to major positive effects in terms of health and well-being. The site has reasonably good access to a GP, open space and Leisure Centre. Improved public open space and recreational facilities would be provided on-site	
5. Reduce inequality, poverty and social exclusion.	The site was appraised to lead to minor positive effects as it has good access to a primary	
6. Support a strong and sustainable economy	The site was appraised to lead to major positive effects in terms of the economy as it is well-located for access to employment sites. It is within the Science Vale UK and near Williams F1 business site.	
7. Natural environment, biodiversity, water and soil quality	The site was appraised to lead to have a minor negative effect in terms of the natural environment. Habitats along the Letcombe Brook would need to be protected	The assessment included consideration of, biodiversity, green infrastructure and sustainable design and construction.
8. Cultural heritage, townscape and landscape.	The site was appraised to have a minor negative effect in terms of cultural heritage, townscape and landscape. Grove conservation area lies to the south of the site.	Development should retain the historic field pattern, tree belts and hedgerows within the site. Addressed by the Site Templates, Landscape and Green Infrastructure.
9. Reduce air, noise and light pollution	The site was appraised to have a minor negative effect in terms of air, noise and light pollution. The scale of growth would likely increase traffic and air, noise and light pollution however they are not appraised to be significant due to other mitigating policies in the plan.	

10. Reduce emissions, the use of resources and improve resource efficiency	The site was appraised to lead to a minor negative effect due to the loss of greenfield land and by increasing the local population which is likely to increase resource use; although mitigating policies are likely to improve resource efficiency as a result.	Studies should be undertaken to ascertain whether the site would lead to overloading of infrastructure. Additional wastewater infrastructure may be required to support the development.
11. Increase resilience to climate change and flooding	The site was appraised to lead to major negative effects in terms of climate change and flooding. The site is on the floodplain. There are issues of on-site standing surface water	The area of the site in Flood Zone 3b (floodplain) within the site will remain free of development. Development would take place on adjoining land in Flood Zone 1, with SUDS used to manage run-off so that it is equivalent to the existing greenfield run-off. The new access road will need to cross the floodplain and will require a design that minimises impact on flood flows. The sequential test established that there were no alternative sites around Grove that could be allocated.

Conclusion – The restriction of development to land in Flood Zone 1 would ensure that the predicted major negative impacts on the floodplain identified under SA Objective 11 were carefully managed. This could be achieved by the use of SUDS to control surface water run-off and the careful design of the proposed new access road. These impacts would be outweighed by the predicted major positive impacts on the provision of homes, health and well-being, and the local economy. In the absence of alternative sites to make the same provision, this site meets the requirements of the Exception Test in National Planning Practice Guidance and is therefore suitable for inclusion as an allocated site in the Local Plan: Part 1. A site-specific flood risk assessment will be required to demonstrate that development on the site would be safe from flooding throughout its lifetime.

9.7 In summary, the following sites have passed the Exception Test –

- Valley Park
- North West Valley Park
- North of Abingdon

- North West Abingdon
- North of Harwell Campus
- South of East Hanney
- Monks Farm, Grove
- South of Park Road, Faringdon

10.0 Conclusion

- 10.1 The Council seeks to locate all development in Flood Zone 1 and is able to meet its housing target by doing so. However, there are eight sites that are largely within Flood Zone 1 but contain elements of Flood Zone 2 and 3. These sites are Valley Park, North West Valley Park, North Abingdon, North West Abingdon, North of Harwell, South of East Hanney, Monks Farm, Grove and South of Park Road, Faringdon. The Sequential Test has shown that there are no alternative sites available, around Didcot and Abingdon or any of the smaller settlements, in areas at lower risk of flooding. Therefore the Sequential Test has been passed and development is considered to be suitable on these sites, provided that development only takes place within Flood Zone 1 and follows guidelines from the Strategic Flood Risk Assessment.

- 10.2 The sustainability credentials of each of the sites has also been assessed as part of the Exception Test required for sites within Flood Zone 3. Whilst all sites contain an area of Flood Zone 3, this is generally fairly small and would not be part of the site where development would take place. Through careful masterplanning, the use of SUDS and undertaking a site-specific flood risk assessment, the Council concludes that the impacts can be mitigated and minimised, and these sites brought forward for development.