

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Stephen McKechnie
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Response Date	23/01/15 14:42
Consultation Point	Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area ( <a href="#">View</a> )
Status	Submitted
Submission Type	Email
Version	0.5
Files	<a href="#">South versus East comparison.pdf</a>
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
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If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	South of East Hanney
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If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate?	No
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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.**

#### Biodiversity

Letcombe Brook is a rare chalk stream one of only 200 in the world, it is a BAP Priority Habitat.

The Traditional Orchard is BAP Priority Habitat Site reference OXON 0694

The current proposal is build over one priority habitat and up to another.

Why?

The site to the East does not have the same aggregation of priority habitats, and will not therefore with protection required for up to twenty red listed species.

This is what people say who have assessed the site

Dudley Les B.S.c M.Inst, Biol, Dip Ed ?The plan of building 200 houses or more to the south of the existing village would threaten much of this environment the stream and the immediate surroundings would be destroyed?

Sally Wallington, Letcombe Brook Project Officer ?This site should be disregarded due to the important biodiversity interest and ecological assets on site. There other sites such as the eastern site (opposite La Fontana) that would be less damaging on the environment?.

PTES ?Traditional orchards such as this have been classified as Priority Habitats under Section 41 (S41) of the Natural Environment and Rural Communities Act 2006. The inclusion of such an important and long established habitat parcel in the Local Plan ignores guidance in not only the NERC Act, but also the National Planning Policy Framework, the Habitats Directive, Oxfordshire County Council?s own Biodiversity and Planning in Oxfordshire guidance, and even closer to home, the White Horse Vale Mission Statement, quoted above.

It would appear that the department responsible for this proposal have failed to take biodiversity, cultural heritage, a community asset and the region?s landscape into account in this instance. An oversight of such obvious gravity will inevitably lead to delays and local objections so it is always beneficial to avoid such complications from the outset rather than engender public resistance and invite greater scrutiny of the Local Plan.

In addition to the obvious cultural heritage considerations, the traditional orchard habitat is important for thousands of species of wildlife. Biodiversity loss is a serious consequence of many factors of modern life including countryside fragmentation and industrialized farming methods, so where further loss and damage can be avoided, it should be actively pursued.

In addition to the orchard in this case is the brook running alongside. Loss of degradation of riparian habitat and disturbance will be detrimental to water voles (a ?priority? species). Foraging patterns of bat species along the brook may be disrupted by light pollution (Daubentons, soprano pipistrelle and brown long-eared feed over water, and the last two are ?priority? species).

Loss of arable habitat may be detrimental to harvest mice and brown hare (both ?priority? species)?.

And those that haven?t been assessed the site say:

VOWH Core Policy 46 ?Development likely to result in the loss, deterioration or harm to habitats or species of importance to biodiversity or of importance for geological conservation interests, either directly or indirectly, will not be permitted unless:

- i. the need for, and benefit of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity interests
- 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 .

The Vale could revert to the east and that development could reasonably located as their assessment show.

#### DEFRA Biodiversity 2020 Strategy

The mission for this strategy is ?to halt the overall biodiversity loss, support healthy well functioning ecosystems and establish coherent ecological networks?.

The proposed location to the south of East Hanney alongside a chalk stream and covering a traditional orchard and will destroy the natural habitat of protected species of this rare biodiversity.

The Strategy also states 'we will reduce direct pressures on our biodiversity' There is nothing more direct that this proposal that proposes to develop this area.

The strategy also states 'we will protect water ecosystems, including habitats and species'

Building near one of the world's rarest water courses is not protecting but endangering habitats and species.

Priority action of the strategy is to 'establish more coherent and resilient ecological networks' by joining up 'existing areas of priority habitat, increasing the opportunity for wildlife to move around the landscape'

Directly opposite, the proposed site and over the chalk stream is an existing Local Wildlife Site these can be joined and thus adhere to DEFRA's priority action.

**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.**

**Q6 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