

Mrs Katherine Pearce
Vale Of White Horse Council
Environmental Services Directorate
Abbey House Abbey Close
Abingdon
Oxfordshire
OX14 3JE

Our ref: WA/2006/000281/CS-
09/PO1-L01

Date: 19 December 2014

Dear Mrs Pearce

**VALE OF WHITE HORSE DISTRICT COUNCIL LOCAL 2031 PLAN PART 1:
STRATEGIC SITES AND POLICIES**

Thank you for consulting the Environment Agency on the Vale of White Horse District Council Local Plan 2031 Part 1: Strategic Sites and Policies. We have reviewed the Local Plan (herein referred as the Plan) and its supporting evidence base and have the following representations to make.

For clarity and the avoidance of doubt we have structured our representations into points of soundness and minor word changes where we are suggesting an improvement but we do not think the matter makes the document unsound.

Points of Soundness

Water Cycle Study (WCS)

We have raised soundness points relating to the effectiveness and consistency with national planning policy of the allocated growth within the Local Plan on matters relating to the requirement to undertake a WCS to determine the impact the allocations will have on the water environment. This has been set out in our representation to:

- Local Plan 2029 Part 1: Strategic Sites and Policies (our letter dated May 2013)
- Local Plan 2031 Part 1: Strategic Sites and Policies (our letter dated April 2014)
- Local Plan 2031 Part 1 Appendix A: Strategic Sites and Policies, Housing Delivery Update, Development Site Templates (our letter dated April 2014).

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A WCS is currently being undertaken, however it has yet to be completed. Until the WCS is finalised the soundness points (effectiveness and consistency with national planning policy) raised in our letters dated May 2013 and April 2014 are still applicable.

Site Allocation Land South of East Hanney, Appendix A, Page 18/19

We note the inclusion of the above site allocation on land to the south of East Hanney to deliver around 200 dwellings. During previous consultations to the Plan a site to the east of East Hanney and south of Steventon Road was proposed. We have not previously commented upon this site allocation, if so we would have raised the following concerns

The site is located adjacent to the Letcombe Brook, a natural chalk stream which has records of water voles, otter and native white-clawed crayfish, all of which are Biodiversity Action Plan (BAP) and Legally Protected Species. This reach of the Letcombe Brook is relatively undisturbed and the proposed allocation

Land alongside watercourses is particularly valuable for providing natural networks of linked habitat corridors to allow the movement of species between suitable habitats.

We have concerns regarding whether this site is effective and therefore deliverable when taking into account the ecological constraints of the site. Unrestricted development within this allocation is likely to have a net loss in habitat corridor, and may lead to a detrimental impact on BAP and Legally Protected Species mentioned above.

The Sustainability Assessment (SA) for the Local Plan indicates that the site will have a major negative effect in terms of the natural environment, due to its close proximity to an important wildlife corridor.

We would therefore have concerns that the land south of East Hanney site allocation is not consistent with the aims of the National Planning Policy Framework (NPPF). The proposed development will result in a detrimental impact of an important wildlife corridor. This is contrary to Paragraph 109 and 118 of the National Planning Policy Framework (NPPF) which aims to conserve and enhance the natural and local environment by minimizing impacts on biodiversity, and providing net gains in biodiversity where possible. Article 10 of the Habitats Directive also stresses the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way.

Core Policy 40: Sustainable Design and Construction

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

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

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

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

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

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

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

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

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

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

Additional land included for safeguarding

We are currently in the early stages of detailed investigations into a Flood Alleviation Scheme (FAS) to the west of Abingdon in the form of a flood storage area to provide downstream benefits within Abingdon. The area of interest in which we are undertaking detailed investigations into the exact location of a scheme relates to land to the west of the A34 and south of Marcham Road, and immediately adjacent to Marcham interchange, known as Abingdon Common.

Whilst a scheme is not fully designed we would not wish development within the vicinity of the scheme to preclude the delivery of a future potential flood storage area. As such we would like to see the land safeguarded within the Plan to prevent development from precluding the delivery of such flood risk management measures.

The principle of safeguarding land would not determine that a flood storage area in this location is acceptable in principle. Therefore, if a scheme were to be progressed, planning permission would be required to determine its acceptability in planning terms.

As such we request the inclusion of a Core Policy within the Plan to safeguard land for the reasons mentioned above. Please find attached draft Core Policy wording, supporting text and a plan showing land for safeguarding for the proposed flood risk management measures.

Word changes/inclusions:

For clarity and the avoidance of doubt the following minor word changes are recommend as an improvement to the Plan but we do not think these matter makes the document unsound. Please note where we have **underlined** words we are recommending the inclusion of wording.

Appendices, Page 18 and 19 – Land south East Hanney

Without prejudice to the above soundness points raised in relation to this site allocation we recommend the inclusion of the following points to the site specific allocation requirements.

- **No development should take place within Flood Zone 3 or 2** – For clarity and to be in accordance with the objectives of the Strategic Flood Risk Assessment (SFRA) and Sequential and Exceptions Test evidence based documents.
- **An appropriate 20 metre buffer zone, free from built development and managed for ecological benefit, to ensure no detrimental impact on the Letcombe Brook wildlife corridor and biodiversity associated with it.** – For clarity and to ensure development on this site allocation will not have a detrimental impact on the biodiversity associated with the Letcombe Brook.

Appendices, Page 40 – North Harwell Campus

We recommend the inclusion of the following points to the site specific allocation requirements.

- **No development should take place within Flood Zone 3 or 2** – For clarity and to be in accordance with the objectives of the SFRA and Sequential and Exceptions Test evidence based documents.

Appendices, Page 44 – Monks Farm, Grove, Flood risk and Drainage

We recommend the inclusion of the following points to the site specific allocation requirements.

- No development should take place within the Letcombe Brook corridor and Flood Zones **3 and 2** (other than Grove Northern Link Road, see SFRA for further details). - For clarity and to be in accordance with the objectives of the SFRA and Sequential and Exceptions Test evidence based documents.

Please don't hesitate to contact me if you wish to discuss the points raised within our representation, in addition we would be happy to attend a meeting to discuss any of matters raised.

Yours sincerely

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