

## Comment

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<b>Company / Organisation</b>	Environment Agency
<b>Address</b>	Thames Region (Area Office) West Area Red Kite House Howberry Park unknown OX10 7BD
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Environment Agency (Mr Jack Moeran)
<b>Comment ID</b>	LPPub2977
<b>Response Date</b>	21/01/15 11:56
<b>Consultation Point</b>	Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Email
<b>Version</b>	0.3
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	No
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	South of East Hanney

**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.**

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.