

22nd January 2019

Appendix 6

Local Plan Team
Vale of White Horse District Council
135 Eastern Ave,
Milton Park,
Milton,
Abingdon
OX14 4SB

Statement to Inform Habitats Regulations Assessment of the Proposed Draft Main Modifications for the Vale of White Horse Local Plan Part 2.

Dear Sir/ Madam

The most recent HRA undertaken for the Vale of White Horse Local Plan Part 2¹ covered all proposed policies provided by the Vale of White Horse District Council. Following hearings, and after receiving the Inspector's Post Hearing Letters PC03 dated 30th October 2018 and PC04 dated 19th December 2018, this letter involves discussion of the proposed main modifications to the Part 2 plan for public consultation. From an HRA perspective, these changes are minor and do not introduce any likely significant effects that were not fully discussed in the previous HRA report.

It should be noted that this Statement should be read in conjunction with the June 2018 HRA report of the Vale of White Horse LPP2.

Table 1. Main Modifications to policies: Test of Likely Significant Effects.

Modification number	Policy/ reference to Local Plan	Main Modification and Test of Likely Significant Effects	Likely Significant Effects Test
MM1	Supporting Text; Para 2.39	An additional paragraph relating to gypsies and travellers and travelling show people has been inserted after paragraph 2.39: <i>'Meeting the needs of gypsies and travellers and travelling show people' Alongside the preparation of the part 2 plan, the council produced a joint gypsy, traveller and travelling show people accommodation assessment* with Cherwell District Council, Oxford City Council and South Oxfordshire District Council. The new assessment identifies that only one new pitch is required in the later part of the plan period (2027-2031). No allocations for gypsy, traveller and travelling show people are therefore proposed in the part 2 plan. Applications for new pitches will be considered alongside the requirements of core policy 27: meeting the needs of</i>	These modifications merely provide contextual background and do not in themselves provide for new development. The conclusions outlined within the June 2018 HRA have not changed.

¹ AECOM (June 2018) Vale of White Horse LPP2 Habitats Regulations Assessment incorporating Appropriate Assessment.

		<p><i>gypsies, travellers and travelling show people.</i></p> <p><i>Inserted footnote (highlighted above by *):</i></p> <p><i>* Cherwell, Oxford City, South Oxfordshire and Vale of White Horse gypsy, traveller and travelling show people accommodation assessment (June 2017).'</i></p>	
MM2	Core Policy 4a: Meeting our Housing Needs	<p>Edits to this policy are clarifying footnotes providing additional information. These include:</p> <ul style="list-style-type: none"> • additional footnote that the 2,200 dwellings for Oxford City are to be provided between 2019-2031 • updating housing figure HEAR 03.1.1 and to reflect LPP2 allocations and total supply (total number of Dwellings is not to change) • deletion of footnote 'c' regarding long term potential of the allocation at Dalton Barracks • deletion of Harwell Campus allocation of 1,000 dwellings • deletion of associated footnote 'e' 	<p>This modification is for factual correctness and expands on information already provided and analysed within the HRA.</p> <p>The conclusions outlined within the June 2018 HRA have not changed.</p>
MM3	Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area	<p>The core policy has been updated as follows:</p> <ul style="list-style-type: none"> • amend housing requirement figure from 7,512 to 7,638 and delete footnote 'a' • update housing supply figures as in HEAR03.1.1 with total supply 8,180 • delete footnote 'd' re long term potential of the allocation at Dalton Barracks 	<p>Whilst this modification provides for 126 additional net new dwellings beyond that assessed within the June 2018 HRA (7,512 net new dwellings) it is considered that this increase in dwellings does not alter the outcome of the June 2018 HRA. The housing numbers at Dalton Barracks have not been increased and therefore Cothill Fen SAC will not be affected. The only effect identified in the Local Plan HRA from housing within this sub-area was air quality related to traffic movements adjacent to Oxford Meadows SAC. However, the modelling undertaken for the HRA was for 26,949 dwellings, which exceeds commitments within the adopted LPP1 and submitted LPP2 combined. As such, the small increase in total housing numbers identified in this policy will not affect the conclusion of the HRA.</p> <p>This modification does not provide for any new additional impact pathways</p>

			that have not previously been assessed within the June 2018 HRA.
MM4	Core Policy 8b: Dalton Barracks Supporting text, Para 2.49 to 2.65	Amendments made to the wording and supporting text for Core Policy 8b: Dalton Barracks Comprehensive Development Framework.	The June 2018 HRA concluded that 22ha of SANG were required to provide mitigation for the 1,200 net new dwellings to be provided at this allocation. The modification provides for 30ha of parkland. Thus this is a positive modification. This modification does not alter the conclusions of the June 2018 HRA.
MM5	Core Policy 13a: Oxford Green Belt	Amendments to the Core Policy are as follows: <ul style="list-style-type: none"> the addition of paragraph: <i>'The settlement of Shippon (including the proposed and existing development at Dalton Barracks) is inset to the green belt as shown on the adopted policies map.'</i> The partial deletion of paragraph: <i>'as the site is large enough to accommodate a substantial sustainable settlement in its own right. This approach ensures that the potential for development is maximised and that further changes to the Green Belt will not be required in the future.'</i> General re-wording and grammatical changes to policy 	This modification does not provide for additional development. It does not alter the conclusion of the June 2018 HRA.
MM6	Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area	Amendments to the Core Policy are as follows: <ul style="list-style-type: none"> Removal of criteria: <i>'iv. Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site, and'</i> Deletion of paragraph: <i>'2.82. Land is also safeguarded for a bus and cycle link to facilitate sustainable travel between the new sustainable community proposed for Dalton Barracks and the proposed transport interchange at Lodge Hill.'</i> Deletion of paragraph: <i>'include the provision of a bus and cycle link from Dalton Barracks to the new Park and Ride site at Lodge Hill, which would provide a direct link from the proposed development to an interchange with services going in to the centre of Oxford and to other key destinations, such as the employment sites to the east of Oxford. The study also'</i> 	This modification does not provide for new development or alter a development management policy that could link to a European site. This modification does not alter the outcome of the June 2018 HRA.

		<ul style="list-style-type: none"> • Insertion of paragraph: <i>'as the options for the schemes progress, the impact of the schemes will be subject to thorough assessment, including full environmental assessment. Where schemes are located in areas of flood zones 2 and 3, the flood risk sequential test and the exception test will be undertaken as part of the options appraisal process.'</i> • Upgraded Footpath Between Shippon and Abingdon 	
MM7	Core Policy 14a: Strategic Water Storage Reservoirs	<p>Amendment to the Core policy are as follows:</p> <ul style="list-style-type: none"> • Updates to the reference of the Draft Water Resources Management Plan (WRMP) 2019. • Addition of paragraph: <i>'This safeguarding shall end if there is no prospect of the scheme being built, for example if it is not included in the finalised water resources management plan 2019 or is refused development consent.'</i> 	Modifications made to the policy provide greater clarity and do not alter the conclusions of the June 2018 HRA.
MM8	Core Policy 15a: Additional Site Allocations for South East Vale Sub-Area	<p>Amendments to the Core Policy are as follows:</p> <ul style="list-style-type: none"> • Amendments to housing requirement figure from 12,150 to 11,949 and delete footnote 'b' • Update to housing supply figures as in HEAR03.1.1 and to reflect LPP2 allocations and total supply (from 1,400 to 400 dwellings now allocated to the South-East Vale Sub-Area) • Deletion of Harwell Campus allocation of 1,000 dwellings and delete footnote 'f' • Amendments to housing delivery paragraphs accordingly 	The removal of 1000 dwellings at Harwell Campus from the South-East Vale Sub-Area is not expected to change the conclusions set out in the June 2018 HRA.
MM9	Core Policy 15b: Harwell Campus Comprehensive Development Framework	<p>Amendments to the Core Policy are as follows:</p> <ul style="list-style-type: none"> • Deletion of paragraph: <i>'The new housing allocated at Harwell Campus will be provided to an exemplar standard and in the form of an Innovation Village to unlock the unique potential for economic growth offered by the Campus. The new Innovation Village will be fully and successfully integrated with the Campus, incorporating on-site services and facilities and reflect a tailored mix of dwellings to help meet the needs of the organisations located at the Campus.'</i> 	Modifications made to this policy do not result in increased development to that previously assessed in the June 2018 HRA. This modification will not change the conclusions of the HRA.

		<ul style="list-style-type: none"> Minor re-wording of policy and grammatical changes. 	
MM10	Supporting text, Paragraphs 2.98 to 2.100 Core Policy 15c: Grove Comprehensive Development Framework	This modification includes re-wording, an additional policy relating to comprehensive development at Grove, including description for clarity and re-organisation of paragraphs 2.98 to 2.100. However, the same information relating to the site allocation for development remain the same.	This modification does not change the outcome of the June 2018 HRA and therefore will not change the conclusions of the HRA.
MM11	Core Policy 18a: Safeguarding of Land for Strategic Highway Improvements within the South-East Vale Sub-Area	Modifications to this Core Policy and the safeguarding of an additional Scheme as follows: <ul style="list-style-type: none"> Cinder Track Cycle Improvements Scheme reduce land safeguarded for dedicated access to/from the A34 to Milton Park 	This modification does not in itself provide for additional development beyond that subject to HRA in June 2018 and therefore will not change the conclusions of the HRA.
MM12	Core Policy 19a: Reopening of Grove Railway Station	Modifications to this policy are as follows: <ul style="list-style-type: none"> Addition of sentence: <i>'three potential options are identified at this stage to allow flexibility for feasibility studies.'</i> Addition of paragraph: <i>'as the options for the schemes progress, the impact of the schemes will be subject to thorough assessment, including full environmental assessment. Where schemes are located in areas of flood zones 2 and 3, the flood risk sequential test and the exception test will be undertaken.'</i> 'additional land safeguarded for Grove Railway Station to include a site to the east of the A338' 	This modification does not in itself provide for additional development beyond that subject to HRA in June 2018 and therefore will not change the conclusions of the HRA.
MM13	Core Policy 20a: Housing Supply for Western Vale Sub-Area	Amendment to this policy are as follows: <ul style="list-style-type: none"> Amendment to housing requirement figure from 3,098 to 3,173. update to housing supply figures as in HEAR03.1.1 with total supply. 	Modifications provide policy clarity and the increased housing requirement figure of 3,373. Whilst this modification provides for 75 additional net new dwellings beyond that assessed within the June 2018 HRA in this location (3,098 net new dwellings) it is not considered that this increase in dwellings alters the outcome of the June 2018 HRA for the reasons already discussed for MM3. This modification does not provide for any new additional impact pathways that have not previously been assessed within the June 2018 HRA.

MM14	Development Policy 1: Self and Custom Build	Non-significant modifications are made to the policy wording.	No additional development has been provided. This modifications will not change the conclusions of the June 2018 HRA.
MM15	Development Policy 2: Space Standards	Non-significant modifications are made to policy wording.	No additional development is provided beyond that subject to HRA in June 2018. This modification will not alter the conclusions of the HRA.
MM16	Development Policy 5: Replacement Dwellings in the Open Countryside	Amendments to the policy are as follows: <ul style="list-style-type: none"> • Re-wording of policy • Deletion of sentence: for example, to site, the replacement dwelling within a less conspicuous, well-screened location. 	This modification does not alter development provided beyond that assessed within the June 2018 HRA. This modification will not alter the conclusions of the June 2018 HRA
MM17	Development Policy 13e: Local Shopping Centres	Non-significant modifications to the policy wording were made for greater clarity.	This modification will not alter the outcome of the June 2018 HRA.
MM18	Development Policy 19: Lorries and Roadside Services	Deletion of proposed change to Appendix M and the policies map accordingly.	This modification does not provide for development in addition to that subject to HRA in June 2018 and does not alter the conclusions of the HRA.
MM19	Development Policy 29: Settlement Character and Gaps	Non-significant re-wording to criteria i. to increase clarity of policy aims.	This modification does not alter the conclusions of the June 2018 HRA.
MM20	Supporting text, Paragraph 3.244	Addition of sentence: ' <i>...and remain free of any built development. Where a watercourse flows through a development, a buffer zone should be provided on both sides of that watercourse.</i> '	This modification to supporting text does not alter the conclusions of the June 2018 HRA.
MM21	Development Policy 36: Heritage Assets	Modification to policy including the addition of supporting text after paragraph 3.304: ' <i>Heritage assets are an irreplaceable resource, and will be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation (and the more important the asset, the greater the weight that will be given). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.</i>	This modification does not alter the conclusions of the June 2018 HRA.

		<p><i>Any harm to, or loss of, the significance of a designated heritage asset will require clear and convincing justification.</i></p> <p><i>In weighing applications that directly, or indirectly affect non-designated heritage assets, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the heritage asset.</i></p> <p><i>These judgements will be made in accordance with national policy.</i></p> <p><i>Developers will also be expected to report, publish and deposit the results of any investigations into heritage assets with the historic environment record (her) and the relevant local and county authorities.'</i></p> <p>Amendments to criteria iv includes the addition of sentence: <i>'provide a sustainable, non-damaging use for a heritage asset that is currently at risk of neglect, decay or other threats'</i>.</p> <p>Addition of the supporting text: <i>'3.305. The council will make information about the significance of the historic environment gathered as part of plan-making or development management publically accessible.'</i></p>	
MM22	Development Policy 38: Listed Buildings	Modifications to the wording of Development Policy 38.	This modification does not alter the conclusions of the June 2018 HRA.
MM23	Development Policy 39: Archaeology and Scheduled Monuments	Modification to paragraph 4 and the last paragraph of Development Policy 39.	This modification does not alter the conclusions of the June 2018 HRA
MM24	Appendix A: Site Development Templates, General Requirements	Modification to Appendix A includes the addition of paragraph: <i>'A health impact assessment that identifies and takes account of the health status and needs in the area and provides information about how to improve health and wellbeing.'</i>	This modification does not alter the conclusions of the June 2018 HRA.
MM25	Appendix A: Site Development Template, Harwell Campus	Deletion of plan and template for Harwell Campus allocation.	This modification does not alter the conclusions of the June 2018 HRA
MM26	Appendix A: Site Development Templates, Utilities	<p>Modification to pages 11, 14, 18, 22, 25 and 28 of the Appendices is to add the sentence: <i>'upgrades to the sewer network may be required ahead of occupation.'</i></p> <p>This is a positive provision for the potential need for upgrades to the sewer network prior to the occupation of new dwellings.</p>	This modification does not alter the conclusions of the June 2018 HRA.

MM27	Appendix A: Site Development Template, Dalton Barracks	Amendments to the plan on page 13 and template on pages 14-16 to reflect reduced allocation of 1,200 dwellings. This is not expected to change the outcome of the HRA.	The June 2018 HRA concluded that 22ha of SANG were required to provide mitigation for the 1,200 net new dwellings to be provided at this allocation. The modification provides for 30ha of parkland. Thus this is a positive modification. This modification does not alter the conclusions of the June 2018 HRA.
MM28	Appendix A: Site Development Templates, East of Kingston Bagpuize with Southmoor (within Fyfield and Tubney Parish)	Amendments to the policy and Appendix A are as follows: <ul style="list-style-type: none"> • Addition of bullet point: <i>'The occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford Junction in 2024/25 unless the upgrade is completed earlier or an agreed phasing plan is agreed with the county council.'</i> • Addition to paragraph 2.45: <i>'The occupation of dwellings on this site will not begin prior to the completion of the upgrade at Frilford Junction unless an agreed phasing plan can be agreed with the county council. The upgrade is anticipated to take place in 2024/25.'</i> • Addition of paragraph: <i>'Provide, subject to viability, a new local centre adjacent to the proposed primary school, located and designed to meet the needs of the expanded village'</i> 	This modification does not alter the conclusions of the June 2018 HRA.
MM29	Appendix	Addition of a new appendix showing proposed amendments to Local Shopping Centres as defined on the draft Adopted Policies Map. This is a cosmetic modification and does not allocated additional development sites.	This modification does not alter the conclusions of the June 2018 HRA.

Yours sincerely,
for **AECOM Infrastructure & Environment UK Limited**



Isla Hoffmann Heap
Senior Ecologist
AECOM Infrastructure & Environment UK Limited