

Response 1: Historic England



Historic England

By email only to: planning.policy@southandvale.gov.uk

Our ref: PL00793763
Your ref East Hagbourne Neighbourhood Plan

Main: 020 7973 3700
e-seast@historicengland.org.uk
[REDACTED]@historicengland.org.uk

Date: 21/09/2023

Dear Sir or Madam

East Hagbourne Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would however like to refer you to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Yours sincerely

[REDACTED]
Historic Places Advisor



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Response 2: Thames Water



E: d[REDACTED]@thamewater.co.uk
M: +44 (0) [REDACTED]

Issued via email:
planning.policy@southandvale.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

15 September 2023

Vale of White Horse District –East Hagbourne Neighbourhood Plan Submission Version

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Policy CF1 – Infrastructure Utilities - Water Supply and Wastewater/Sewerage Infrastructure

We support the reference to sewage infrastructure, but consider the section should be strengthened in line with the following:

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy to support section 11.1. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Policy SD1 – Sustainable Development - Water Efficiency/Sustainable Design

We support the reference to water efficiency in Policy SD1, but consider the section should be strengthened in line with the following:

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Policy SD1 should be updated as follows:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Policy E3 Flooding - Comments in relation to Flood Risk and SUDS

We support the following section in Policy E3 as it is in line with our previous responses:
Proper provision must be made for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development

where off site sewerage infrastructure and capacity is not in place ahead of development. We therefore support Policy E3 in this respect.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

Development Sites

The information contained within the neighbourhood plan will be of significant value to Thames Water as we prepare for the provision of future wastewater and water supply infrastructure.

There is one site in the Neighbourhood Plan which already has outline approval and we commented on the application.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,

[REDACTED]
[REDACTED] Property Town Planner

Response 3: Hagbournes and Upton Group for Sustainability

HUGS comments on the East Hagbourne Neighbourhood Plan Review

September 2023

We're keen that EHPC act to support biodiversity and climate. We'd like to see a move away from just recommendations towards follow-through actions. For example, some of the PC's sustainable development guidelines were not followed up in the Deanfield development.

The Neighbourhood Plan, specifically **Appendix 12 A Strategy for People and Nature** in East Hagbourne *provides a framework within which more detailed plans for nature recovery can be developed*. HUGS is keen to work with the Parish Council to develop more detailed plans.

Appendix 11 Design Guidelines provides excellent guidelines for new development. However, while both appendices describe recommendations, they currently lack a list of detailed plans and defined deliverables. HUGS is keen to work in partnership with the PC to define these deliverable actions.

HUGs previous feedback to the PC on the draft NP in May 2023 in terms of setting targets has not yet been actioned. HUGS would like to work in partnership with the PC to agree targets which can be included in the NP. The list below is far from exhaustive but provides examples of areas of focus and target setting.

Comments	Suggested actions
Definitive targets need to be set in specific areas working with local groups to define strategies to mitigate existing losses and prevent further losses (HUGS feedback to PC in May 2023)	Target setting where losses of habitat/hedgerows/native trees has occurred with numbers of plants and timeline.
Native hedging HUGS highlighted (May 23) the removal of native hedging along a strip of 20 metres on the slopes of the Sustrans route adjacent to the site and the removal of native hedging along the front of the Deanfield site and the hedging along the boundary with the carpark. NP Appendix 11 Design Guidelines: <i>Focus on native hedging</i> has not been respected by the developer	Number and species to be agreed with means of funding, with timelines for planting to mitigate losses of native hedging in front of the Deanfield development and carpark and along Sustrans route at the edge of the development.

<p>Bat boxes in design guidelines.</p> <p>NP Appendix 11 Design Guidelines: <i>no detail provided of numbers installed /required in new development</i></p>	<p>Determine number fitted by developer to date. Define requirement, number and timescales for boxes to be retrofitted in Deanfield development</p>
<p>NP Appendix 12</p> <p>Grasslands</p> <p><i>We encourage efforts to increase native flora in these areas and provide habitat for invertebrates and small mammals.</i></p> <p>Orchards</p> <p><i>We encourage the planting of new orchards, particularly if they can be in publicly accessible locations.</i></p> <p>Wildlife Corridors</p> <p><i>The existing grass strips might be protected and diversity encouraged and that if possible they could be widened</i></p>	<p>Define targets for how to increase native flora and provide habitat</p> <p>Identify relict orchards (eg Lawsons Orchard) to be revitalised. Identify suitable green space areas for new orchards.</p> <p>Define how this can be achieved.</p>
<p>Biodiversity mentioned in the nature recovery appendix, however no direct actions come from this document</p>	<p>Agree local targets and timescales</p>
<p>CIL funding not mentioned</p>	<p>Community level consultation needed regarding spending focus, targets, timescales. Targets could include funding of ponds/orchards/community projects</p>
<p>Green spaces: the PC owns a field in the parish which could be the focus of tree planting, grassland management, ponds and community agriculture projects. However, this land is not mentioned in the neighbourhood plan.</p>	<p>Integrate these green spaces into NP with targets and timescales.</p>
<p>Verges and other grassland</p>	<p>Need to be included, including revised cutting regimes and timescales for implementation</p>

While preserving village views and the character of the open landscape is important, it should not be a sole consideration or form a barrier to the PC fulfilling its other recommendations, such as tree planting and good grassland management for biodiversity.

As a group, we are keen to see the PC follow up on its existing recommendations on trees, hedges, grassland and waterways, and to address timings and frequency of verge cutting. We would like to work with the PC to produce plans to address creation of wildlife friendly habitat and hedgerows (including hedgerow trees) and to prioritise tree and hedge planting and grassland management (including verges).

Hagbournes & Upton Group for Sustainability

www.hugsustainability.org

Response 4: South Oxfordshire District Council

Policy and Programmes

HEAD OF SERVICE: TIM ORUYE



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

19 September 2023

East Hagbourne Neighbourhood Development Plan Review – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

South Oxfordshire District Council has worked to support East Hagbourne Parish Council in the preparation of their Neighbourhood Plan Review and compliments them on a thoughtful, comprehensive and well-produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the East Hagbourne Neighbourhood Development Plan (NDP) Review during the pre-submission consultation.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that require further consideration. To communicate these in a simple and positive manner, we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan meets the basic conditions.

Yours faithfully

[REDACTED]

[REDACTED]

Senior Planning Policy Officer (Neighbourhood Planning)

Ref.	Section/Policy	Comment/Recommendation
1.	<p>General</p> <p>Page 11</p> <p>Page 28</p>	<p>As the NPPF has recently been updated (to the 2023 version) we recommend the following amendments to provide the most up to date information:</p> <p>In this 2023 Update, references have been updated to reflect the current (20212023) version of the NPPF and the current South Oxfordshire Development Plan.</p> <p>...it was a valued landscape for the purposes of the NPPF (see Para 174 in the NPPF 20212023).</p>
2.	Page 20 - Policy SD1 – Sustainable development	<p>We recommend the following amendment to this policy, for clarity:</p> <p>Decrease or, at the very least, do not increase the risk of flooding from increased runoff or from building within flood risk areas and take account of the predicted impact of climate change during the lifetime of the development.</p>
3.	Page 32 Policy VC3 - Retaining smaller village character and promoting good design	<p>Our Urban Design Officer has recommended that a reference to the Joint South and Vale Design Guide 2022 is added to the policy wording, for clarity, as follows:</p> <p>...and should follow the provisions of the East Hagbourne Design Guide 2023 (Design Guide) as shown in Appendix 11, as well as the Joint South and Vale Design Guide 2022.</p>
4.	Page 38 Policy VC5 - Conserving and Enhancing Heritage Assets	<p>We recommend inserting the missing full stop at the end of the first paragraph, to ensure consistency with the rest of the policy.</p>
5.	Page 45 Policy H3 – Housing Allocation	<p>This policy refers to the allocation on the main road adjacent to Hagbourne Village Hall. One of the criteria it lists to address is: '<i>Provide sufficient onsite parking for residents of the new development to minimise on-street parking</i>'. Our Urban Design Officer has</p>

		<p>recommended that the word '<i>inappropriate</i>', regarding on-street parking is added, for clarity, as they highlighted that on-street parking can be at times successful in reducing parking numbers:</p> <p>Provide sufficient onsite parking for residents of the new development to minimise inappropriate on-street parking.</p>
6.	Page 48 Policy CF1 Infrastructure	<p>We recommend removing the following additional punctuation, to provide consistency with the rest of the policy:</p> <p>...infrastructure upgrades if these are needed;</p>
7.	Page 49 Policy CF2 – Infrastructure - community facilities	<p>We recommend the following amendments of minor typographical errors in the policy:</p> <p>The Plan identifies the following facilities as key East Hagbourne community facilities: (...) will not cause a significant harm to the amenities of adjoining residential properties.</p>
8.	Page 54 – Policy TA3 Parking	<p>We recommend the following minor amendments to the policy, for clarity:</p> <p>Parking provision should:</p> <ul style="list-style-type: none"> - Wherever practicable, parking be provided off-road; - Be sufficient for the full life of the development and should avoid the increase in on-street parking or use of existing public car parks in the future;
9.	General - applies to: Pages 16-17, 38, 46, 59 – 66, 79, 81	<p>Some or all of the paragraph spacing on these pages has disappeared. We recommend that this is reinstated for clarity and to ensure it is user-friendly for those with visual difficulties.</p>

10.	Page 69 Policy E2b - Enhance Wildlife Habitat	There is a missing bullet point at the end of this policy – we recommend re-inserting this for consistency with the rest of the policy and its requirements.
11.	Page 70 Policy E3 - Flooding	<p>This policy has been added to since the Regulation 14 consultation. We recommend the following amendment, to ensure clarity and address what ‘it’ refers to:</p> <p style="padding-left: 40px;">Proper provision must be made for surface water drainage to ground, water courses or surface water sewers. It Surface water must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.</p> <p>We also recommend the following minor typographical amendment:</p> <p style="padding-left: 40px;">...can be maintained into the future.</p>
12.	Page 71	<p>We recommend the following minor amendments to provide clarity and consistency with Policy E3 – see comment above:</p> <p style="padding-left: 40px;">Proper provision should be made for drainage of surface water to ground, watercourses or surface water sewerss.</p> <p style="padding-left: 40px;">(...)</p> <p style="padding-left: 40px;">Developments should be designed to avoid of surface water entering the sewerage system in order to maximise the capacity for foul sewage and reduce the risk of sewer flooding.</p>
Typographical / Presentational Amendments		
13.	Page 2	<p>We recommend amending ‘COMMUNITY NEEDS’ to ‘Community Needs’, to ensure visual consistency with the rest of the contents page.</p> <p>We recommend amending the list of appendices so that the punctuation at the end of each title is consistent, as currently some appendices listed end in a comma, some in a colon and some with no punctuation. This is a minor presentational recommendation.</p>

14.	Page 22	<p>This page includes newly added paragraphs since the Regulation 14 consultation. We recommend the following minor amendments, for clarity:</p> <p style="padding-left: 40px;">Local Plan Policy DES7 calls on development to make provision for the effective use and protection of natural resources, including making efficient use of water, for example, through rainwater harvesting and grey water recycling, and causing no deterioration in, and where possible, achieving improvements in, water quality. (...) We encourage the efficient use of water, for example through rainwater and grey water recycling.</p>
15.	Page 40	<p>We recommend inserting the missing full stop at the end of the page, for consistency with the rest of the bullet points.</p>
16.	Page 56	<p>We recommend amending the weblinks at the foot of this page to blue text, for consistency with the rest of the plan.</p>
17.	Page 62-63	<p>We recommend moving the 'Figure 15' title, so it sits directly above the figure itself, for clarity, as the title and map currently sit on separate pages.</p>
18.	Page 69	<p>We recommend amending the double space between 'of cutting' to a single space.</p>
19.	Page 80	<p>We recommend the following minor typographical amendment:</p> <p style="padding-left: 40px;">The space immediately adjacent to the village hall was and is reserved as an emergency access, and as a turning space and for buses when they need to pick-up or set down.</p>
20.	Page 84	<p>We recommend amending the list of appendices so that the punctuation at the end of each title is consistent, as currently some appendices listed end in a comma, some in a colon and some with no punctuation. This is a minor presentational recommendation.</p>

Strategy for People and Nature		
21.	Page 8	As explained in our Regulation 14 comments, we continue to recommend that a legend is inserted for Figure 3: 'Wildlife assets in East Hagbourne based on local knowledge', so readers understand what the colours/hatching/letters are referring to. The further description that has been added is supported, however a simple colour coded legend would provide further clarity.
Design Guide and Code		
22.	Page 34	<p>We recommend the following typographical amendment, to remove the additional l – it should say 'pavilion'.</p> <p>The Recreation Ground, within which the East Hagbourne Pavillion lies, has a dominant character establishing a feeling of openness in the area.</p>
23.	Page 27 Figure 13	<p>Our Equalities Officer commented on the picture of the stone paved footpath along Church Close, explaining that whilst it may seem rural, it is not really accessible, as people with walking aids would find it hard to use them on this path.</p> <p>Therefore, we recommend the following amendment to the Figure 13 caption, for clarity and to ensure accessibility for all:</p> <p>Figure 13: The stone-paved footpath along Church Close introduces a level of informality, enhancing the rural feel of the area, although we would expect all footpaths to be built to an accessible standard, for people with different needs.</p>
24.	Page 13	Our Urban Design Officer has recommended that both Manual for Streets 1 (MFS 2007) and 2 (MFS 2010) should be referenced on this page, to ensure consistency. They highlighted that they are two complementary guidance documents for local authorities on

		designing residential and busier urban streets respectively. As it stands, only MFS 1 is referenced.
25.	Page 69 and 70	<p>Our Urban Design Officer recommends that reference is added in these pages to the Joint Design Guide natural environment sections, for clarity.</p> <p>We recommend adding the following wording, in brackets, as follows:</p> <p>At the end of the 'Design Guidelines for trees':</p> <p>(Also see the Joint Design Guide Natural Environment sections 'The Value of Trees' and 'Natural Features and Resources').</p> <p>At the end of the 'Design Guidelines for open spaces':</p> <p>(Also see the Joint Design Guide Open Space design section within the Space and Layout chapter).</p> <p>At the end of the 'Design Guidelines for biodiversity':</p> <p>(Also see the Joint Design Guide Natural Environment sections 'The Value of Biodiversity' and 'Natural Features and Resources').</p>
26.	General	Our Urban Design Officer stated that there is 'little mention of the various densities from different character area types. This should be part of the analyses'. We therefore recommend minor modifications to the character areas in the Design Guide, in order to take this into account.

**The following responses were received after
the Regulation 16 period had ended**

Response 5: Oxfordshire County Council

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING
CONSULTATION:**

District: South Oxfordshire

Consultation: East Hagbourne Neighbourhood Plan Review Consultation

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council supports the ambition of East Hagbourne Parish Council to review the current neighbourhood plan adopted April 2019 and would like to thank the Parish Council for giving the County Council the opportunity to provide comments.

We hope you find our comments in the attached Annex helpful as you make amendments prior to submitting the plan. We would also advise that you review OCC's Neighbourhood Planning Guide (updated March 2021) which is available [here](#).

Officer's Name: [REDACTED]

Officer's Title: Planner

Date: 21 September 2023

ANNEX 1
OFFICER ADVICE

District: South Oxfordshire

Consultation:

Team: Strategic Planning

Date: East Hagbourne Neighbourhood Plan Review Consultation

Strategic Comments

Policy VC4 - Assets of local distinctiveness

Area 6 Ryman's Crescent:

Oxfordshire County Council (OCC) as the Highway Authority is responsible for the maintenance of the public highway. The Policy VC4 - Assets of local distinctiveness on page 35 of the Neighbourhood Plan identifies area (6) Ryman's Crescent which falls within Highway land, this status takes precedent when any future highways works are required. **The County Council, therefore, request the boundaries of this area is revised to exclude Highways land.**

Area 3 Railway Embankment:

Please see our Property Response on page 7 which we asked is noted in relation to Policy VC4 - Assets of local distinctiveness regarding our land ownership.

Transport and Access

- Page 52 Policy TA2 – Footpaths and Pavements includes policy wording 'Footpaths' and 'Footways' is it recommended the wording is reviewed for the requirements of new developments in line with [the Oxfordshire Walking Design Standards guidance](#) .
- Appendix 11 - Design Guide refers to the Department of Transport 'Manual for Streets 1', however not 'Manual for Streets 2'. The County Council's [Street Design Guide](#) is also recommended for inclusion.
- It is recommended Policy TA3 – Parking on page 54 refers to the County Council's [Parking Standards](#) guidance.

Further consideration within the Plan should also be given to digital connectivity.

Detailed officer comments are included below.

District: South Oxfordshire
Consultation: East Hagbourne Neighbourhood Plan Review Consultation
Team: South & Vale Locality Team
Officer's Name: [REDACTED]
Officer's Title: Transport Planner
Date: 13/09/2023

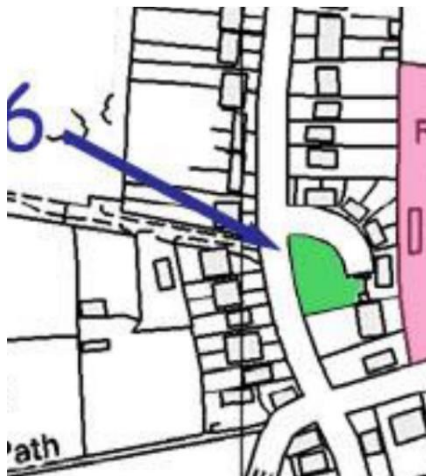
Transport Comments

Policy VC4 - Assets of local distinctiveness

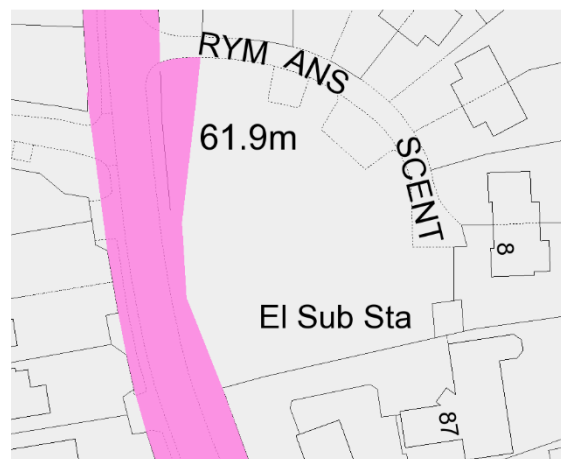
Development affecting locally distinctive features or their setting as identified in the East Hagbourne Village and Landscape Character Assessment 2017 (Appendix 2) and Figure 7 should demonstrate how it will contribute to conserving or enhancing the special quality and distinctive character of the parish.

Policy VC4 refers to seven assets of local distinctiveness. Two of the seven assets are additional as part of the 2023 update. One of these is shown below:

Asset of local distinctiveness
Ryman's Crescent



Extract from the highway extent
mapping



The land shown in green known as Ryman's Crescent appears to be partly within the maintained highway, (they are within highway land and the County Council is the relevant Highway Authority) as shown in pink in the image to the right.

The plan above are extracts from the highway extent mapping, showing coloured what are, according to our current records, the highways maintainable at the public expense in the area of interest and a key explaining the colouring used. Uncoloured areas (which are not otherwise Public Rights of Way) are not publicly maintained and we hold no records of private ownership. The colouring shows the extent of the highways according to our current highway record plan, except that where there is a

roadside ditch the highway boundary is usually the roadside edge of the ditch. They do not constitute a formal highways search and therefore if you require plans, please request them at www.oxfordshire.gov.uk/highwaysearches.

Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way.

District: South Oxfordshire

Consultation: East Hagbourne Neighbourhood Plan Review Consultation

Team: South & Vale Locality Team

Officer's Name: [REDACTED]

Officer's Title: Transport Development Control Lead

Date: 08/09/2023

Transport Development Control Comments

Appendix 11 Design Guide: Manual for Streets 1 (MfS) is quoted, but not MfS 2 nor is OCC's Street Design Guide.

The chapter for Environmental & Sustainability has a common thread of requiring new development to provide new footpaths. This approach is encouraged and supported to promote active travel etc. However the terminology used here is not quite right. Footpaths and Footways are different pieces of pedestrian infrastructure and vary in widths and construction. I would recommend the NP reviews this especially for requirements of new developments.

EV charging is required which meets the OCC requirements, however installing them on-street raises potential obstructions to users of the highway. Not ruling this out but wording around this section (page 81) suggesting can be investigated maybe more appropriate. On-site EV & parking courts is fine. Parking courts are generally private – how the points are powered is something a developer will need to consider at the time of a planning submission.

No specific mentioned of car parking numbers or OCC standards.

District: South Oxfordshire

Consultation: East Hagbourne Neighbourhood Plan Review Consultation

Team: Property

Date: 12th September 2023

Property Comments

It would appear County own the section of land either side of the road and railway bridge, to allow access to the embankment, this is now shown to be classified as a 'asset of local distinctiveness'.

The policy wording states;

Policy VC4 - Assets of local distinctiveness

Development affecting locally distinctive features or their setting as identified in the East Hagbourne Village and Landscape Character Assessment 2017 (Appendix 2) and Figure 7 should demonstrate how it will contribute to conserving or enhancing the special quality and distinctive character of the parish.

There is unlikely to be any development within this area, other than maybe any upgrading or repairs of the steps/access to the Embankment. Any such development is unlikely to affect the distinctive features or the setting of the village in any harmful way.

As such our comment is that the policy should not impact on any safety/access or repair works which the service may need to be carry out in this area as and when may be required. The wording of the policy as drafted does not appear to affect this, as any such works would be considered as conserving or enhancing that asset by way of its preservation and access to it, as an asset.

Response 6: Natural England

Date: 21 September 2023
Our ref: 445226
Your ref: East Hagbourne Neighbourhood Plan



██████████
South Oxfordshire District Council

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BY EMAIL ONLY

planning.policy@southandvale.gov.uk

T 0300 060 3900

Dear ██████████

East Hagbourne Neighbourhood Plan Review – Regulation 14 Consultation (Modified)

Thank you for your consultation on the above dated 09 August 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely


Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones).**

Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>