

**BURCOT & CLIFTON HAMPDEN  
NEIGHBOURHOOD PLAN**

**CONSULTATION STATEMENT**

**Responses from Statutory Consultees to the  
Regulation 14 Consultation**

**Submission Version**



David Wilson

Burcot and Clifton Hampden Parish Council

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22 September 2022

## South Oxfordshire – BURCOT & CLIFTON HAMPDEN NEIGHBOURHOOD PLAN 2011 – 2034 PRE-SUBMISSION DRAFT FOR REGULATION 14 CONSULTATION

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the South and Vale area and are hence a **“specific consultation body”** in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

### **General Water and Wastewater Infrastructure Comments**

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).

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. Details on Thames Water’s free pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the 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. 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 that the Neighbourhood Plan include the following policy/supporting 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.”***

## **Water Efficiency/Sustainable Design**

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.

Proposed policy text:

***“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.”***

### **Comments in Relation to Flood Risk and Sustainable Drainage Systems**

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".

Flood risk sustainability objectives and policies 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.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

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.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision 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.”***

### **Site Allocations**

The attached table provides Thames Water’s site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements.

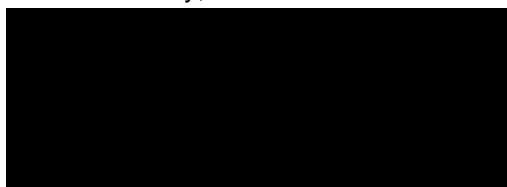
We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

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.

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

Yours faithfully,



David Wilson  
Thames Water Property Town Planner

Policy and Programmes

**HEAD OF SERVICE:**

**HARRY BARRINGTON-MOUNTFORD**



Listening Learning Leading

**Contact officer: Emma Wright**



29 September 2022

**Burcot and Clifton Hampden Neighbourhood Development Plan – Comments under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)**

Thank you for giving the Council the opportunity to offer formal comments on your draft neighbourhood plan.

Having seen a complete draft, along with the supporting evidence documents, we are able to offer further advice under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to 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 sincerely

Emma Wright  
Planning Policy Officer (Neighbourhood)

Ref	Section/ Policy	Comment/Recommendation
1.	<p>Date amendments</p> <p>Page 7, para 1.2</p> <p>Page 12, para 3.3</p> <p>Page 13 Fig A</p> <p>Page 14 Fig B</p>	<p>The South Oxfordshire Local Plan 2035 (SOLP), adopted in December 2020, now forms part of the development plan for the district and replaces the South Oxfordshire Local Plan 2011 and Core Strategy 2012. It includes a strategy for delivering growth from 2011 to 2035. We note that the Neighbourhood Plan period is proposed to run until 2034. We suggest extending the Neighbourhood Plan period until 2035 to align with the SOLP.</p> <p>To reflect the most up-to date position and taking account our suggestion regarding the plan period we recommend the following amendments:</p> <p>1.2 The purpose of the Neighbourhood Plan is to set out a series of planning policies that will be used to determine planning applications in the area in the period to 2035. The Plan will form part of the development plan for the South Oxfordshire District, alongside <del>the South Oxfordshire Core Strategy adopted in 2012 (which runs to 2027)</del> and the South Oxfordshire Local Plan <del>2011 – 2034</del> <b>2035</b>, now adopted.</p> <p>3.3 The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises <del>the Core Strategy adopted in 2012 (covering the period to 2027)</del> and the adopted <b>South Oxfordshire</b> Local Plan <del>2011 to 2034</del> <b>2035</b>. There are also minerals and waste policies adopted by Oxfordshire County Council, but none are considered relevant to the Neighbourhood Plan.</p> <p>Fig A: South Oxfordshire Local Plan <del>2034</del> <b>2035</b> – Strategic Allocation Maps for Culham Science centre and Berinsfield</p> <p>Fig B: South Oxfordshire Local Plan <del>2034</del> <b>2035</b> – Safeguarding Map for Clifton Hampden Bypass</p>
2.	Page 2	We suggest the removal of 'rather' as it appears more conversational in comparison to the tone of the rest of the plan:

		<p><b>3. Planning Policy Context</b> This <del>rather</del> technical section relates this Plan to the National Planning Policy Framework and the planning policies of South Oxfordshire District Council.</p> <p>We also recommend a minor typographical amendment for clarity: 'There is a Policy Maps at the back of the plan'.</p>																								
3.	Page 4	<p>We recommend minor typographical amendments for clarity:</p> <p>By the end of 2016, many of the desired benefits had already been progressed, e.g. faster broadband, a new children's playground, community activities, <b>and</b> traffic calming in Burcot.</p> <p>However, many of the desired improvements require planning permission: a new surgery building, a 10-15% increase in housing, cycle paths, <b>and</b> additional parking.</p> <p>It is our intention that the NP and the NDO are submitted to SODC together for formal consultation, public examination, and referendum in <b>May 2022. [amend date as appropriate]</b></p>																								
4.	Page 6 table	<p>We note that Policies BCH2 and BCH5 have been renamed since production of the table on Page 6; and we recommend they are further renamed to 'BCH2 – Enhancing Community Facilities' and 'BCH5 – Protecting Community Facilities' for clarity (see comment numbers 15 and 24 for explanation of this).</p> <p><b>LIST OF POLICIES</b></p> <table border="1" data-bbox="542 954 1254 1313"> <thead> <tr> <th>POLICY NO.</th> <th>POLICY TITLE</th> <th>PAGE NO.</th> </tr> </thead> <tbody> <tr> <td>BCH1</td> <td>School Improvements</td> <td>X</td> </tr> <tr> <td>BCH2</td> <td>Recreation Ground &amp; Village Hall</td> <td>X</td> </tr> <tr> <td>BCH3</td> <td>Design Principles in Burcot</td> <td>X</td> </tr> <tr> <td>BCH4</td> <td>Design Principles in Clifton Hampden</td> <td>X</td> </tr> <tr> <td>BCH5</td> <td>Local Heritage Assets</td> <td>X</td> </tr> <tr> <td>BCH6</td> <td>Green Infrastructure</td> <td>X</td> </tr> <tr> <td>BCH7</td> <td>Local Landscape Character</td> <td>X</td> </tr> </tbody> </table>	POLICY NO.	POLICY TITLE	PAGE NO.	BCH1	School Improvements	X	BCH2	Recreation Ground & Village Hall	X	BCH3	Design Principles in Burcot	X	BCH4	Design Principles in Clifton Hampden	X	BCH5	Local Heritage Assets	X	BCH6	Green Infrastructure	X	BCH7	Local Landscape Character	X
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5.	Page 8, paras 1.6-1.7	Now that the 'Planning for the Future' White Paper has since been followed up with the Levelling Up and Regeneration Bill (2022) we recommend that paras 1.6-1.7 are updated to address the Bill rather than focus solely on the White Paper, as this provides detail of the Government's latest position surrounding Neighbourhood Plans and their opportunities. A useful summary can be found on the <a href="https://www.gov.uk">gov.uk website</a> .
6.	Page 8, paras 1.9 – 1.10	In light of the inclusion of policies BCH1 and BCH2 the district council will be required to review the Strategic Environmental Assessment Screening. We will undertake the process set out in the regulations and provide the qualifying body with an updated screening opinion in due course.
7.	Page 10 para 2.4	The last sentence of this paragraph spreads across the page and looks inconsistent with the rest of the paragraph - we recommend this is amended for ease of reading/consistency.
8.	Page 11	<p>We recommend the following typographical/numerical amendments and NPPF 2021 paragraph updates for clarity:</p> <p>2.9 About 1880 the area began to attract attention as a desirable Thames-side residential district, and <del>this character</del> it still retains <b>this character</b>.</p> <p>2.12 It is in the Gothic style of the Victorian era. The architect was George Gilbert Scott!</p> <p>3.2 The latest National Planning Policy Framework (NPPF) published by the Government in <del>2019</del> <b>2021</b>, is an important guide in the preparation of local plans and neighbourhood plans. The following paragraphs of the NPPF <del>2019</del> <b>2021</b> are considered especially relevant:</p> <ul style="list-style-type: none"> <li>• Neighbourhood planning (§28 - §30)</li> <li>• Rural Housing (<del>§77 78</del> - §79 <b>80</b>)</li> <li>• Promoting healthy and safe communities (§94 <b>92</b>)</li> <li>• Community facilities (§92 <b>93</b>)</li> <li>• High quality design (§424 <b>126</b>)</li> <li>• Protecting Green Belt land (§443 <b>137 - 151</b>)</li> <li>• Conserving and enhancing the natural environment (§170 <b>174</b>)</li> <li>• Conserving and enhancing the historic environment (§185 <b>189-190</b>)</li> </ul>

		<p>3.6 [...] Existing open space, <del>S</del>sport and recreational facilities</p> <p>Our Equalities and Inclusivity Officer has also suggested that the use of the symbol § to indicate sections in the NPPF could cause an issue with those reading the document with a visual impairment.</p> <p>We recommend the symbol § is replaced with ‘para’ or ‘paragraph’ as preferred, for clarity and understanding.</p>
9.	Page 13	<p>We recommend the following amendments to provide clarity/most up to date information to reflect STRAT9 and 10i:</p> <p>Policy STRAT9 proposes a total of 3,500 new homes adjacent to the Centre (with 4,850 <b>approximately 2,100</b> to be built in the plan period).</p> <p>Policy STRAT10i proposes the development of 1,700 new homes at Berinsfield to the immediate east of Burcot.</p>
10.	Page 12 para 3.4	<p>We recommend minor amendments/additions to para 3.4 to accurately reflect the description of SOLP Policy H16: Backland and Infill Development and Redevelopment, as the policy does not specify hectare measurements/restrictions as currently described:</p> <p style="padding-left: 40px;">‘The settlement infill development policy is H16 and allows for infill on sites <del>of up to 0.2 ha (equivalent 5 to 6 homes)</del> <b>meeting certain criteria</b>. It also supports redevelopment <b>of previously developed land</b> and sets no site area limit for such proposals.’</p> <p>We recommend the following numerical amendments for clarity due to the NPPF’s 2021 update:</p> <p>3.5 [...] In which case, unless ‘very special circumstances’ can be demonstrated, proposals will only be supported by this policy if they are deemed appropriate in the Green Belt as set out in NPPF §<del>145 and §146-147</del> – <b>149</b>. For housing schemes, <del>that</del> <b>exceptions</b> includes proposals for ‘limited infilling in villages’ <b>(para 149 e)</b>.</p>
11.	Sections 4, 5 and 6	<p>We note there are no paragraph numbers in these sections. For consistency with the rest of the document, we recommend that these are added.</p>

12.	Page 18	<p>We recommend the following typographical amendments for clarity:</p> <p>‘During the COVID-19 lockdown, <b>the</b> school, surgery and shop all played pivotal roles in sustaining the community who could shop for essential groceries, use mail services, and access healthcare services without having to leave the parish’.</p> <p>‘The community’s wish to retain and sustain these amenities, shared by both villages within a single parish, and to be enjoyed for <del>their</del> <b>the community’s</b> benefit and that of their successors emerged from the 2014 survey as the cornerstone of the vision for this Neighbourhood Plan, and one of the key drivers to grow the village and develop new housing.’</p>
13.	Page 19	<p>We recommend the following typographical amendments for clarity:</p> <p>There have been discussions over recent years about the possibility of the surgery merging with or moving in to the Berinsfield Surgery site, but this option has been discounted, as it is not possible <del>as for</del> the Berinsfield Surgery <del>cannot to</del> be extended to provide the space that would be required by a merged practice. Furthermore, Clifton Hampden Surgery will need to have capacity to expand, to meet the needs of the proposed new Culham development which falls within the catchment, as well as housing expansion which is occurring in Long Wittenham and the edge of Didcot. <del>And</del> <b>It may</b> potentially <b>need to</b> accommodate additional patients from the proposed Berinsfield housing expansion which <del>will</del> <b>could</b> present challenges to the surgery there.</p> <p>In addition, it would be helpful to reference the source of the information provided in this section. You should also be mindful that SOLP Policy STRAT9: Land Adjacent to Culham Science Centre requires the provision of sufficient health care capacity, likely to be a total of one new GP surgery on site to serve existing and future demand in this area in accordance with the council’s Infrastructure Delivery Plan.</p>
14.	Policy BCH1, Page 20	<p>As this policy is addressing improvements or extension to the Primary School, to fully address NPPF para 149’s Green Belt exceptions, it is recommended that potential exceptions behind extensions/alterations of buildings in the Green Belt are more explicitly addressed in the policy. Additionally, SODC Policy ENV8: Conservation Areas describes how proposals ‘must conserve or enhance’ Conservation Areas; and Policy ENV6: Historic Environment describes how proposals will be supported where they ‘conserve or</p>

		<p>enhance the significance of the heritage asset’, so for clarity we recommend the words ‘conserve’ and ‘significance’ are added to the policy:</p> <p>BCH1 School Improvements Proposals to improve or extend the Clifton Hampden Primary School (as shown on the Policies Map) will be supported, provided the new buildings or structures are designed and sited in such a way that their impact on the <del>open nature</del>, rural character and visual amenity of the Green Belt is minimised, <b>not having a greater impact on the Green Belt’s openness, and not resulting in disproportionate additions over and above the size of the original building</b> <del>that</del>. They will <del>also sustain and</del> <b>conserve or</b> enhance the significance of the Clifton Hampden Conservation Area and the <b>significance and</b> setting of other designated heritage assets.</p>
15.	Policy BCH2, page 21	<p>As this policy is addressing improvements, extensions and replacements to Community Facilities, we recommend that its title is expanded to ‘BCH2: <b>Enhancing</b> Community Facilities’, for clarity of purpose. To fully address NPPF paras 149 and 150 Green Belt exceptions, it is recommended that the points about ‘appropriate facilities...preserving the openness’ of it and the exceptions behind extensions/alterations of buildings in the Green Belt are more explicitly addressed in the policy.</p> <p>Additionally, SOLP Policy ENV8: Conservation Areas describes how proposals ‘must conserve or enhance’ Conservation Areas; and Policy ENV6: Historic Environment describes how proposals will be supported where they ‘conserve or enhance the significance of the heritage asset’, so for clarity we recommend the words ‘conserve’ and ‘significance’ are added to the policy:</p> <p>BCH2 Community Facilities</p> <ol style="list-style-type: none"> <li>Proposals to improve or extend or replace the pavilion and ancillary buildings at the Clifton Hampden Recreation Ground (as shown on the Policies Map) will be supported, provided the improved/updated/ new buildings or structures are designed and sited in such a way that their impact on the <del>open nature</del>, rural character and visual amenity of the Green Belt is minimised, <b>preserving the openness of it, and not resulting in disproportionate additions over and above the size of the original building</b>. <del>that</del> They will <del>also sustain and</del> <b>conserve or</b> enhance the significance of the Clifton Hampden Conservation Area and the <b>significance and</b> setting of other designated heritage assets.</li> </ol>

		<p>2. Proposals to improve or extend the Village Hall (as shown on the Policies Map) will be supported, provided the improved/updated/ building is designed and sited in such a way that its impact on the <del>open nature</del>, rural character and visual amenity of the Green Belt is minimised. Proposals should <b>preserve the openness of the Green Belt and not result in disproportionate additions over and above the size of the original building</b>; and <del>that they will sustain and</del> <b>conserve or</b> enhance the significance of the Clifton Hampden Conservation Area and the <b>significance and</b> setting of other designated heritage assets.</p> <p>3. Proposals to deliver new cemetery space or additional off-street car parking spaces to serve the village amenities will be <del>encouraged</del> <b>supported</b>, provided they are consistent with other relevant policies of the development plan, <b>preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.</b></p> <p>4. Proposals to reorganise or to relocate existing allotment plots will be supported provided there are sufficient plots remaining to serve the needs of the local community for the plan period.</p> <p>Our Equalities and Inclusivity Officer has also highlighted that we should ensure we make our communities accessible, so everyone can feel included. Therefore, they recommended that mention is made to ensuring Community Facilities are accessible to all users.</p> <p>Regarding this policy's paragraph 4, the Equalities and Inclusivity Officer also recommended the idea of including/mentioning raised beds on allotments for the above reason, too.</p>
16.	Page 21, para 7.19	<p>We recommend the following amendments to para 7.19, both due to the NPPF's 2021 update and to highlight the fact that extension/alteration to buildings in the Green Belt are exceptions in the NPPF, for clarity:</p> <p>'NPPF <del>§145</del> <b>paragraph 149</b> allows <b>exceptions</b> for the extension <b>or alteration</b> of buildings in the Green Belt, provided the proposals are not disproportionate <b>additions</b> to the size of the original building.'</p>

17.	Policy BCH3 Design Principles in Burcot	<p>Because this policy addresses design features as well as views, we recommend this is specified in the initial policy wording, for clarity. This would align with the National Design Guide’s explanation that ‘well-designed new development responds positively to the features of the site itself and the surrounding context...enhances positive qualities and improves negative ones. Some features are physical, including: [...] views inwards and outwards’.</p> <p>To ensure clarity and demonstrate, as required by the Planning Practice Guidance, planning ‘positively, in a way that is aspirational but deliverable’, we recommend that additional wording about proposals positively responding to design features is added.</p> <p>The two suggestions above are set out below:</p> <p style="padding-left: 40px;">Proposals for development will be supported, provided they sustain and enhance the distinctiveness of the village and <b>positively reflect and respond to</b> <del>they have full regard to</del> the following design features <b>and important views</b> where relevant to their location in the Parish...</p>
18.	Page 22 – para 7.21	<p>Our Senior Urban Design Officer has recommended that the newly adopted South Oxfordshire and Vale of White Horse Joint Design Guide is mentioned, in order to provide up to date information. We therefore recommend the insertion of an additional paragraph to follow para 7.21, or elsewhere in the plan as the NP group would find it appropriate, as follows:</p> <p><b>7.22 South Oxfordshire and Vale of White Horse District Councils adopted their Joint Design Guide Supplementary Planning Document (SPD) in June 2022, which is a material consideration when determining planning applications. As per NPPF paragraph 129, this was based on effective community engagement and reflects local aspirations for the areas’ development. The Neighbourhood Plan will follow the principles of this Guide, as well as taking into account the guidance contained in the National Design Guide and the National Model Design Code.</b></p>
19.	Page 22 – para 7.22	<p>We recommend the following minor typographical amendments:</p>

		<p>7.22 The majority of housing stock in the village of Burcot has been constructed since about the end of the 19th century and <b>inis</b> largely grouped along or off the A415 Abingdon Road. To the north of and fronting the A415 <b>are 18</b> properties known as Balfour cottages.</p>
20.	Page 23 – paras 7.23-4	<p>We recommend the following minor typographical amendments:</p> <p>7.23 <b>Sited</b> <del>To</del> to the south side of the road <del>and sited near to it</del> are various pairs and terraces of old cottages, namely: Clock Cottages, Rosemary <b>C</b>eottages and Chapel <b>C</b>eottages. The former <del>hasve</del> generous rear gardens whilst to the rear of chapel cottages is Burcot Chapel, a listed chapel now converted into a single dwelling. Also, on the south side of the road are a number of detached properties in generous and heavily wooded grounds. Some of these have lawns running down to the <del>r</del>River Thames. The properties are mostly individual and detached and constructed in the 20th century.</p> <p>7.24 Some large riverside mansions were built in Victorian times, notably Burcot Grange, still a single residential property, and Burcot House now subdivided into 3 smaller units. Also, to the south of the A415 is Burcot Park a close of 16 detached properties built in the 1960(s). To the west of Burcot Park is Riverside house (formerly Croft House). This property was built in 1899 as a mansion by the Croft Family, in substantial riverside gardens.</p>
21.	Policy BCH4 Design Principles in Clifton Hampden	<p>Similarly to Policy BCH3, because this policy addresses design features as well as views, we recommend this is specified in the initial policy wording, for clarity.</p> <p>Additionally, to ensure clarity and demonstrate, as required by the Planning Practice Guidance, planning ‘positively, in a way that is aspirational but deliverable’, we recommend that additional wording about proposals positively responding to design features is added:</p> <p style="padding-left: 40px;">2. Development proposals should also <del>have full regard</del> <b>positively reflect and respond</b> to the following design features <b>and important views</b> where relevant to their location in the Parish.</p> <p>We also recommend the following policy and minor typographical amendments, for clarity and understanding:</p>

		<p>a. There is a wide variety of plot shapes and sizes in <b>the</b> High Street with buildings generally no more than two storeys and set close to the front of the plot behind a low hedge or railings and a narrow grass verge to the highway edge</p> <p>g. Buildings along Watery Lane are located tight to the street with large garden plots generally running on an East-West <b>axis</b>, and <del>in the case of</del> plots on the western side backing onto a public footpath.</p> <p>Our Conservation and Design Team also gave supportive feedback of the design principles in BCH4, as they relate to the conservation area. They hope local stakeholders might evolve these principles into a conservation area appraisal for Clifton Hampden in the future. Please contact us if you would like to explore this further.</p>
22.	Page 24 – para 7.28	<p>We recommend the following minor amendment to reflect the Planning Practice Guidance’s request that Neighbourhood Plans should be prepared positively, in a way that is aspirational but deliverable:</p> <p>7.28 The areas reflect the different periods of growth of the village since mediaeval times. Acknowledging this history and its consequences for how the village appears is important in successfully managing <b>and, where possible, enhancing</b> the design of development proposals.</p>
23.	Page 25 – para 7.33	<p>We recommend the following minor typographical amendment:</p> <p>Proceeding west there are three detached houses in substantial plots built in keeping with the village, <b>with</b> panelled windows, tiled roofs, brick chimneys. They are all reasonably set back from the A415.</p>
24.	Page 26 Policy BCH5 Assets of Community Value	<p>This policy needs careful consideration, primarily because the buildings listed are not Assets of Community Value and we note that the Parish Council has acknowledged that it is ‘responsible for the Registration of these assets’. We recommend the following:</p> <p><b><u>Option 1:</u></b> To provide clarity and importantly to prevent confusion, we recommend that this policy is renamed to ‘Protecting Community Facilities’ and reference is made to SODC Policy CF1: Community Facilities. A useful example of a community facility policy, for reference, is Culham’s <a href="#">Policy CUL1: Community Facilities (page 31)</a>. This amendment is recommended because, as the group is aware, Neighbourhood Plans cannot designate Assets of Community Value (ACV) and this designation is carried out via a</p>



separate legal process. An ACV policy would also only apply once the Neighbourhood Plan group ensured the buildings listed in the policy were nominated/listed as ACVs by SODC and importantly ACV are only temporary designations, for 5 years. Therefore, it is recommended that the buildings are instead identified with Community Facility status, enabling the policy to last for the entirety of the plan period.

Recommended amendments to the policy wording:

~~BCH5 Assets of Community Value~~ **Protecting Community Facilities**

1. The Neighbourhood Plan identifies the following buildings as **Community Facilities** ~~Assets of Community Value~~:

- a. The Chequers P.H., Abingdon Road, Burcot
- b. Clifton Hampden Primary School\*
- c. The Barley Mow PH, Clifton Hampden\*
- d. The Shop and Post Office, High Street, Clifton Hampden
- e. The Surgery, Watery Lane, Clifton Hampden
- f. The Village Hall, Clifton Hampden

*\* Please note these facilities are also Grade II Listed Buildings.*

BCH5 paragraph 2's wording is very similar to the wording used in Policy CF2 – Assets of Community Value, in the made Chalgrove NDP; however, it omits the last sentence in that policy which acknowledges that development would be supported, provided the facility is no longer economically viable. Overly onerous requirements in the current BCH5 paragraph 2 could result in facilities being left empty and disused; to better align part 2 of the policy with SOLP Policy CF1: Safeguarding Community Facilities, and make the policy more effective, we would recommend the following amendments:

2. Proposals that may result in harm to, or unnecessary loss of amenity of, **Community Facilities** ~~an Asset of Community Value~~ will be resisted **not be supported**, unless it can be demonstrated that: ~~there is a public benefit that outweighs the harm or loss.~~

**i) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities;**

**ii) it has been determined that the community facility is no longer needed; or**

**iii) in the case of commercial services, it is not economically viable.**

**Option 2:**

If the NDP group feel strongly that a policy for Assets of Community Value is preferred, as explained above, we recommend further explanation is made surrounding the fact that a NP Policy regarding ACV cannot designate the assets; that the buildings listed are not yet designated assets, and that this is carried out via a separate legal process. A useful example of such explanation, for reference, is the Chalgrove Neighbourhood Plan (page 43).

Their supporting text explains, for clarity, that they: 'seek to protect designated Assets of Community Value from unnecessary loss. For clarity, the policy does not seek to designate assets in the first instance (this cannot be done through the Neighbourhood Plan but is being done through another legal process); it only applies to assets once they have been designated'. We recommend Policy BCH5 is amended with further explanation such as this, for clarity.

In this context, it would also not be appropriate to list the buildings/facilities within the policy text. The buildings are not currently registered as ACV the registration could lapse during the life of the plan.

Additionally, Policy BCH5 explains that 'Proposals that may result in harm to, or unnecessary loss of amenity of, an Asset of Community Value will be resisted, unless it can be demonstrated that there is a public benefit that outweighs the harm or loss'. As explained in Option 1, this wording is very similar to the wording used in Policy CF2 – Assets of Community Value in the made Chalgrove NDP; however, it omits the last sentence in that policy which acknowledges that development would be supported, provided the facility is no longer economically viable. Overly onerous requirements in the current BCH5 paragraph 2 could result in facilities being left empty and disused; to better align the policy with SODC Local Plan Policy CF1: Safeguarding Community Facilities, and make the policy more effective, we would recommend the following amendments:

2. Proposals that may result in harm to, or unnecessary loss of amenity of, an Asset of Community Value will be resisted **not be supported**, unless it can be demonstrated that: ~~there is a public benefit that outweighs the harm or loss.~~

		<p><b>i) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities;</b></p> <p><b>ii) it has been determined that the community facility is no longer needed; or</b></p> <p><b>iii) in the case of commercial services, it is not economically viable.</b></p>
25.	Page 26 to 27	We note that paragraphs numbered 7.37 appear twice; we recommend paragraph renumbering here for clarity.
26.	Page 27 para 7.37	Here we recommend the Neighbourhood Plan should refer to SOLP Policies ENV3 and 5, rather than the now-superseded Core Strategy policy CSG1, to ensure it provides up-to-date information.
27.	Policy BCH6 Green Infrastructure	<p>We have a number of points regarding this policy:</p> <p>We cannot see the mentioned Green Infrastructure Network on the policies map; we would recommend this is added, or shown in a separate map, for clarity and understanding.</p> <p>Because the mentioned Green Infrastructure Network is likely to cover a large area (and not yet indicated on a policies map), we consider a nod towards checking the areas' statutory status in relation to development needs should be included in the policy wording.</p> <p>We suggest changes along the lines of:</p> <p>2. Development proposals that lie within or adjoining the Network <b>should</b> <del>are required to</del> have full regard to the need to protect the value and resilience of the Network <del>to</del>, <b>in a manner commensurate with the land's statutory status or identified quality in the development plan. Proposals should</b> <del>and</del> deliver <b>an appropriate level of</b> new green infrastructure measures, <b>having regard to requirements set out in the Green Infrastructure Strategy, AONB Management Plan and a net gain to general biodiversity assets seek to deliver a minimum biodiversity net gain of 10%, having regard to the requirements of section 15 of the National Planning Policy Framework.</b></p>

28.	Policy BCH7	<p><u>Landscape</u></p> <p>NP Policy BCH7: Local Landscape Character highlights a blanket restriction on large scale development, which does not align with SOLP Policy ENV1: Landscape and Countryside, that protects landscape, countryside and rural areas against harmful development. This explains that ‘Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of South Oxfordshire’s landscapes’ (for example, the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames).</p> <p>We recommend the policy wording is modified as follows:</p> <p>The culturally and historically important local landscape character of the parish, and in particular the waterscape of the River Thames corridor and its setting, will be conserved and where possible enhanced. <del>Large-scale development of any kind will be inappropriate</del> <b>Development will only be supported where it protects and, where possible enhances, features of the</b> open countryside and the river corridor and the area’s landscapes.</p>
29.	Page 27 – para 7.38	<p>Paragraph 7.38’s supporting text appears more stringent than the policy. We recommend, therefore, that this is amended to reflect the policy text:</p> <p>7.38 The policy <del>requires</del> <b>explains</b> that all development proposals that lie within the Network, or that adjoin it, should consider how they may improve it, or at the very least do not undermine its integrity of connecting spaces and habitats...</p>
30.	Page 27 – para 7.39	<p>For clarity, we recommend, in para 7.39, the reasons/evidence behind why the green infrastructure network ‘will become more valuable over time’ are explained. If this is not clear, we recommend replacing ‘will’ with ‘may’.</p> <p><b>7.39 The Network (will/may) become more valuable over time</b>, and although the majority of these features are physically attached to enable habitat connectivity, some features of the Network are not. This</p>

		does not devalue their integral biodiversity or recreational value and at some point, in the future an opportunity may arise to achieve similar connectivity.
31.	Page 28 – para 7.43	<p>As explained in the NPPF and Planning Practice Guidance (PPG), Neighbourhood planning groups can play an important role in identifying the special qualities of each area but plans/policies must be supported by appropriate evidence. Describing the landscape elements as ‘rare and highly valuable’ is suitable, provided evidence is available designating/describing them as this. If this is not available, we would suggest the following amendment to align with the NPPF/PPG, to explain that the Neighbourhood Plan values the landscapes:</p> <p>7.43 In addition there is historical map evidence to demonstrate that the existing hedgerows and woodland groups defining the field patterns in the area are of great age, many of them predating the Inclosure Acts (1896), <b>and therefore are highly valued</b> <del>so are rare and highly valuable</del> landscape elements, <b>with those predating the Inclosure Acts identified as Important under the Hedgerow Regulations 1997.</b></p> <p>The additional last sentence takes into our Landscape Officer’s explanation that hedgerows are identified as Important under the Hedgerow Regulations 1997 if they pre-date the Enclosure Acts and bound by agricultural land, forestry, etc.</p>
32.	Page 28 – para 7.45	<p>Our Landscape Officer stated that the wording of <i>‘the setting to the AONB is just as important as the AONB itself’</i>, does not accurately reflect NPPF paragraph 176, which states ‘great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues’ and that ‘the scale and extent of development within all these designated areas should be limited’. However, it lessens the weight of areas classed as AONB <i>setting</i>, explaining <b>‘while development within their setting should be sensitively located and designed</b> to avoid or minimise adverse impacts on the designated areas’.</p> <p>As background, the wording of SOLP policy ENV1 was addressed, with respect to this, by an Inspector at a recent appeal (Ladygrove, Didcot) as follows: <i>‘31. LP Policy ENV1 does not strictly follow the advice of the latest NPPF in that it sets a higher bar for development in the setting of an AONB. It is therefore inconsistent with the NPPF to a degree, and this lessens the weight I attach to the policy’.</i></p> <p>To ensure consistency and avoid any similar issue, we recommend the following amendment:</p>

		<p>7.45 The parish borders the North Wessex Area of Outstanding Natural Beauty (AONB), which has the highest status of protection. The setting to the AONB <del>is just as important as the AONB itself as it</del> sets the frame for this protected landscape and provides long distance views...</p> <p>As with the suggestion regarding para 7.43 above, we would recommend the statement below is supported by appropriate evidence and/or examples, for clarity. For example, which artists and which cultural/literary references?:</p> <p style="padding-left: 40px;">‘The rich and beautiful scenery of the local area has long been the subject of artists and mentioned in important cultural and literary references.’</p> <p>Giving references will generate increased interest.</p>
33.	Page 28. para 7.46	<p>Our Landscape Officer has also observed that this paragraph states that overall the local landscape has an ‘intact structure and sense of place’. Whilst this may apply to some areas, large areas of the parish are within local Landscape Character Area 2, LCT 13 and 17, and are not described as ‘intact landscapes’ but as having a weak landscape structure, lacking hedgerows and large scale intensive arable land. We therefore recommend the following minor amendment for clarity/accuracy:</p> <p>7.46 Overall the local landscape has a strong rural character with areas of high scenic quality, <del>retains an intact structure and sense of place</del>, and is prized for its historical and amenity value. Living within such an aesthetically pleasing and culturally meaningful landscape makes an important contribution to the well-being of residents and strengthens the sense of community and attractiveness of the area, including for tourism.</p>
34.	Page 30 – Policies Map	<p>We commend the Neighbourhood Plan for a detailed, helpful policies map. Given its detail, we would recommend the map quality is enhanced, the map key fonts enlarged and the map potentially allocated its own landscape page, for clarity of reading, especially where some policies overlap (BCH1 and BCH5b).</p> <p>Where the yellow/green colours overlap blue, it is difficult to distinguish whether they are yellow or green. Therefore we suggest BCH1 is changed to another colour for clarity – for example pink or orange.</p>

<p><b>35.</b></p>	<p>Climate Action Team</p>	<p>Our Climate Team provided detailed comments, where they welcome the Neighbourhood Plan’s objectives around sustainable development, enhancing the natural environment and improving cycling and walking networks. However, in the current draft they suggest the policies could be strengthened to maximise delivery of these objectives. For example, they suggest current draft policies could be reviewed to incorporate measures on reducing carbon emissions, energy saving/renewable energy and low carbon transport.</p> <p>Addressing climate change is a high priority for South Oxfordshire District Council, and we encourage that our target for South Oxfordshire to be a carbon neutral district by 2030 be reflected in the Neighbourhood Plan policies. The Climate Team suggested that the following could be considered (not an exhaustive list):</p> <ul style="list-style-type: none"> <li>• Opportunities for renewable energy generation within the parish.</li> <li>• How footpaths and cycle ways can be improved and extended to make it easier and safer for residents to make short journeys on foot or by bike.</li> </ul> <p>For these topics we recommend looking at <a href="#">policies in other adopted neighbourhood plans</a> in South Oxfordshire. Additionally, <a href="#">this guide</a> by the Centre for Sustainable Energy contains some excellent examples of low carbon neighbourhood plan policies.</p>
<p><b>36.</b></p>	<p><b>Presentational Matters</b></p> <p>Plan A, Figure A, Figure B, Plan B –</p>	<p>We have some general comments on presentational matters of the Plan</p> <p><b>Map legibility</b> - it is difficult to interpret the first four figures as they are quite blurry, especially Figure A. Replacing the maps with better quality screenshots may be easier to view.</p> <p><b>Document accessibility</b> - we have used Adobe Acrobat Pro’s Accessibility Check and Accessibility Report features to review both the NDP and NDO. The documents have passed almost all of the tests. Adding alternate text to images and figures on both documents and checking the nesting of headings on the NDP document would make them more accessible.</p> <p>Alternative text (also known as ‘Alt Text’) describes the appearance and function of an image. Screen readers will read aloud alt text to the user. This allows people who would not otherwise be able to see the image, such as blind and visually impaired people, to hear the description of it. Alt text should be a</p>

		<p>reasonable replacement for the image, which is particularly important if your image is a map, flowchart or infographic.</p> <p>Adding alt text using Microsoft Word is a straightforward process. First insert your image, then right click on it and select “Edit alt text...” which will make a panel appear on the left hand of your screen. Use the text box to describe your image.</p> <p>It is also important that headers are properly nested in order to help assistive technology (such as screen readers) accurately navigate your document. In Microsoft Word, you can add headings by using the Styles options under the ‘Home’ tab on the banner at the top of the program.</p> <p>We are happy to discuss the accessibility of the Plan document with you in more detail.</p>
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Historic England

By email only to: consultationBACH@gmail.com

Our ref: PL00786563

Your ref: Burcot and Clifton Hampden Neighbourhood Plan Regulation 14  
Consultation

[REDACTED]  
[REDACTED]  
[REDACTED]

Date: 29/11/2022

Dear Sir or Madam

**Ref: Burcot and Clifton Hampden Neighbourhood Plan Regulation 14  
Consultation**

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Neighbourhood Plan.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

Paragraph 190 of the [National Planning Policy Framework](#) (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.



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





Historic England

We welcome the production of this neighbourhood plan and are aware of a separate consultation taking place on a relevant Neighbourhood Development Order.

We would like to offer some comment which may add additional detail and clarity and may prove helpful.

Whilst it is noted that the plan refers to existing Local Plan Policies relating to the management of Historic Environment ENV6 Listed Buildings ENV7 and Conservation Areas ENV8.

There is some confusion in the contents of the plan that Policy BCH5 referred to in the first instance as Local Heritage Assets in the body of the text is renamed Assets of Community Value.

It would be helpful to have a specific policy relating to the future management of the Historic Environment within the plan area; such as

*Protect or enhance the historic environment by preserving or enhancing the unique and special character, architectural style, historic settlement pattern and spaces, of the designated and non-designated heritage assets, including the conservation area, Listed buildings, scheduled ancient monuments, archaeology*

The plan would benefit from clearly outlining the position of the significant designated and non-designated assets which go to make up the historic environment in the designated area.

Whilst it is welcomed that the Clifton Hampden Conservation Area is noted within the text there is no reference to an existing Conservation Area Appraisal and Management Plan (if appropriate ) or the need for one.

It is also noted that there appears to be no reference within the plan to locally significant Non-Designated Heritage Assets.

We would actively support the inclusion of a list of non-designated heritage assets within the plan. We recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest in order to ensure they merit consideration in planning for their significance and to inform future decisions to sustain or enhance this significance. We refer you to our advice on local heritage listing for further information:

<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

For further general advice we would refer you to our detailed guidance on successfully incorporating historic environment considerations into your



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neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record

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

Louise

**Louise Dandy**

Historic Places Advisor



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FAO: Burcot & Clifton Hampden Parish Council

Our Ref: Tracker ID: #17617

RE: BURCOT & CLIFTON HAMPDEN NEIGHBOURHOOD PLAN 2011 PRE-- 2034  
SUBMISSION INITIAL PARISH DRAFT FOR CONSULTATION ( (REGULATION 14 OF THE  
NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012)

Thank you for inviting National Highways to comment on the above Consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34.

We have reviewed the above consultation and have 'No Comments'. However, please continue to consult us via our team's inbox at: [REDACTED]

Regards

Mrs Beata Ginn

Assistant Spatial Planner (Area 3)

National Highways | Bridge House | Walnut Tree Close | Guildford GU1 4LZ

Web: <https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

Copy of SODC Officer Stuart Roberts Comments

Sent 3 Sep 22

Further to the above consultation, I have reviewed the associated documents and I will re-issue my comments from the associated application P21/S4383/PEJ:

Having reviewed the submitted planning application and supporting documentation, I have extensively considered Environmental Protection matters related to noise, odour and dust. The application site is likely to be adversely affected by traffic noise from the A415 (Abingdon Road) running adjacent to both sites. The applicant will therefore need to demonstrate via an environmental noise assessment and noise mitigation scheme that the site is suitable for the proposed development.

The application site is also close to nearby existing residential properties and the applicant should consider and demonstrate their proposed means of controlling noise and dust adversely affecting these properties.

Please note that matters relating to Air Quality or Contaminated Land which may be pertinent to this application will be reviewed by other Officers within the Environmental Protection Team. Any observations and comments by these Officers will be provided via separate consultation

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

**District:** South Oxfordshire

**Consultation:** Burcot and Clifton Hampden Neighbourhood Plan 2011-2034  
**(Pre-Submission Document)**

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**Annexes to the report contain officer advice.**

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**Overall View of Oxfordshire County Council**

The County Council supports the parish in its ambition to prepare a neighbourhood plan. 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 our neighbourhood planning toolkit is reviewed, it can be found [here](#). We look forward to seeing the Submission version of the plan.

**Officer's Name:** Sarah Steere-Smith

**Officer's Title:** Planner

**Date:** 29 September 2022

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**ANNEX 1**  
**OFFICER ADVICE**

**District:** South Oxfordshire

**Consultation:** Burcot & Clifton Hampden Neighbourhood Plan 2011 – 2034 (Pre-Submission Document)

**Team:** Strategic Planning

**Officer's Name:** Sarah Steere-Smith

**Officer's Title:** Planner

**Date:** 29<sup>th</sup> September 2022

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## **Strategic Planning Comments**

This neighbourhood plan area is washed over by Green belt designation. The Parish have been advised that the case for the proposed development of new homes, GP surgery and other uses need to be made through a Neighbourhood Development Order. This draft Neighbourhood Development Order is being consulted on in parallel to this neighbourhood plan.

### HIF1

The widening of the A4130 at Didcot, Clifton Hampden Bypass, Didcot Science Bridge and Culham River Crossing make up the Didcot Garden Town Housing Infrastructure Fund programme (HIF1) and are currently the subject of planning application [R3.0138/21](#) which at the time of writing is yet to be determined. At this stage, future development should avoid land safeguarded in the South Oxfordshire Local Plan for any of these schemes and land covered by the application. Contributions towards delivering HIF and other highway contributions are to be provided where these are necessary to mitigate development proposals.

### BCH6 Green Infrastructure

Whilst this policy describes the area it covers – the inclusion of a map showing these areas would be an improvement for the next version of the NP.

### Broadband

Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being (NPPF para 114). Consideration should be given to the fact that any new homes or commercial premises planned to be built have 21st digital infrastructure installed at the build phase. Developers should be required to engage with a telecommunications network provider to provide a full fibre connection to each residential/business premise. This will significantly mitigate environmental impacts of any proposed development. People will be able to work from home, reducing unnecessary journeys. Moreover, digital infrastructure provides the backbone for digital technologies' role in building a low carbon economy.



**District:** South Oxfordshire

**Consultation:** Burcot & Clifton Hampden Neighbourhood Plan 2011 – 2034 (Pre-Submission Document)

**Team:** Estates

**Date:** 29/09/22

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## Estates Comments

OCC Estates welcomes the opportunity to comment on the pre-submission neighbourhood plan and wishes to make the following representations and observations:

1. The policy list on page 6 describes policy BCH5 as a Local Heritage Assets policy, whereas the policy itself covers the topic of assets of community value. Please could this be corrected? Similarly the title of policy BCH2 appears to differ from the title in the list on p.6.
2. The support for the primary school facilities to expand is welcomed. Applications for development at the school will be determined having regard to the relevant Green Belt and heritage policies in force at the time of application.
3. The policy approach adopted in policy BCH5 appears to go beyond that envisaged in the Assets of Community Value (England) Regulations 2012. The Locality [guidance](#) confirms that “*Once listed as Assets of Community Value with the local authority, the local community will be informed if they are listed for sale within the five year listing period. The community can then enact the Community Right to Bid, which gives them a moratorium period of six months to determine if they can raise the finance to purchase the asset.*” This does not appear to be the basis of the policy that has been drafted.

The supporting text to the policy further confuses things because it suggests the Parish Council is responsible for identifying these Assets (whereas the District is the keeper of the formal ACV list). If the intent of the policy is as explained at paragraph 7.37, namely “*...for the purposes of applying Local Plan Policy ENV6 on Heritage Assets*” Then the policy would be better re-defined to refer to heritage assets and not Assets of Community Value. As drafted, the policy appears to confuse two different areas of planning legislation. The second point of the policy suggests it is intended to be a heritage policy (by referring to ‘public benefit’ (cf. NPPF paras 201 & 202)). Are the properties listed in policy BCH5 actually intended to be Non-Designated Heritage Assets? If so then para 203 of the NPPF is the relevant paragraph, but the test in that paragraph does not refer to ‘public benefits’, it refers only to a judgement needing to be made, having regard to the scale of any harm or loss and the significance of the heritage asset, so the second part of policy BCH5 would need to be reworded to reflect this.

**District:** South Oxfordshire

**Consultation:** Burcot & Clifton Hampden Neighbourhood Plan 2011 – 2034 (Pre-Submission Document)

**Team:** Oxfordshire County Archaeological Service

**Officer's Name:** Steven Weaver

**Officer's Title:** Planning Archaeologist

**Date:** 21/09/2022

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## **Archaeology Comments**

Although the neighbourhood plan provides some narrative regarding the heritage of Burcot and Clifton Hampden there is no specific policy relating to the historic environment and preservation and enhancement of the parishes heritage assets.

We would therefore recommend that the Neighbourhood Plan is amended to include or incorporate a specific policy on the historic environment that would serve to achieve the goal of conserving and enhancing the historic environment as set out in, and to accord with, the NPPF, this along the following lines:

### **Policy - Historic Environment**

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2021).

Further, policy BCH5 is incorrectly identified as Local Heritage Assets in policy list (page 6) where this subsequently relates to Assets of Community Value.