

DRAFT FOR PC CONSIDERATION

Burcot and Clifton Hampden Parish Council

September 2023

Neighbourhood Plan Examination

1st Clarification Note - Parish Council Response

The Examiner has asked for clarification in four areas.

1. **Policy BCH 5.** The Examiner asked if the third part of the policy has been designed to address proposals which would result in the loss of the identified facilities (by way of a proposed redevelopment or a change of use to a non-community use)?

Response: Yes. The objectives for the Neighbourhood Plan includes “to sustain and improve local services, business and amenities”, and this policy speaks directly to this objective. The wording in the third part of this policy is as recommended by SODC in their response to the Regulation 14 consultation.

2. **Policy BCH 6** The Examiner commented that this policy adds little value and the text is contradictory, as no non-designated assets were listed.

Response: The policy was included to reflect responses to the Regulation 14 consultation from Heritage England and SODC as a mechanism for giving additional protection to assets that the community feels warrant additional protection but are not nationally designated Heritage Assets. Our reading of the Regulation 14 responses from HE and SODC was that such a policy would act as a ‘placeholder’, should the community at some point in the future identify assets to have designated as Local Heritage Assets, and to go through the designation process, at which point BCH6 would come into play.

We acknowledge that the Examiner may take the view that without including specifically designated, Local Heritage assets, there is little point to this policy and suggest it is removed. However, there are several assets that residents have requested be considered because they substantially contribute to the character of the area, notably in Burcot that lies outside the conservation area within the Neighbourhood plan area; these include: St Mary’s chapel/school designed by Sir George Gilbert Scott built 1869, an ornamented brick water tower and several gabled Victorian estate cottages built around the same time, The second former chapel was built in the 1930s to serve a Missionary College using stone perpendicular sections taken from other churches. Other striking houses include 1960s cubic structures and recent modernist houses.

The PC recommend keeping the policy and will address the designation of assets via a plan review in the future.

We also note SODC’s comments around the drafting of this policy, and the use of the word ‘designated’ to describe both nationally designated and locally designated heritage assets. In the event that the Examiner is content for the policy to be retained, we would welcome a recommendation on the appropriate terminology to be used.

Comments on representations made to the plan.

3. **SODC recommendations**, SODC have been very pro-active in their contributions to the NP and their response here continues in that spirit. We accept their recommendations in the main.
4. **Statutory consultees**. In addition to SODC's extensive comments and recommendations, there were several consultees with actionable comments.

The Thames Water response makes comments and recommendations regarding policy for general water and wastewater infrastructure, flood risk and sustainable drainage systems. The proposed text is presented below:

“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.”

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.”

The Burcot and Clifton Hampden water catchment area is particularly fragile, with historical flooding, a sewerage system that is already under strain, and its recognition as a prime wild swimming location (along with other water sports). The PC recommend including the proposed text in the future drafting of the Burcot and Clifton Hampden Design Code.

Other Statutory consultees provided useful suggestions (notably Natural England) that don't affect policy directly but will provide valuable guidance once the Neighbourhood plan is adopted.

5. **Members of the Public**. In general, the community is supportive of the NP. It is acknowledged that with the development of the NDO, leading to consultations running concurrently, there has been some confusion, as noted by the Examiner. This has been noted, and we will endeavour to engage the community throughout this process to minimise confusion leading up to the referendum. There are several residents who provided detailed comments, including points around conflicts with Local plan and National policy, lack of clarity in policy and supporting evidence. We ask the Examiner to take these points into consideration.

In addition, several suggestions that directly relate to policy and errors are highlighted in table below, along with PC recommendations:

Issue	Summary of Comment	Parish Council Response
Typographical	Correction of typographical, spelling and grammatical errors	Accept and amend
Factual	The NP states there are 3 pubs in the NP area. The Barley Mow is in the Long Wittenham NP Area.	Accept and Amend Close examination of the NP area map reveals this comment is correct. Our confusion has arisen because the Barley Mow lies within the Clifton Hampden Conservation Area.
Factual	Paragraph 5.1 Contrary to the statement, only two of the amenities have been gifted by the Gibbs family to the village.	Accept and amend by removing the statement about gifting.
Policy	Community facilities in BCH2 should each have their own policy and rationale	Noted. PC will review this via a plan review in the future.
Policy	The NP should include a Design Code, as has been included in both the Culham and Sutton Courtney NPs.	<p>Whilst the NP does not include a design code, it does include design principles in BCH3 and BCH4, both of which have been described by the Examiner as ‘good policies’. There is some concern that these policies may not be prescriptive enough, particularly for Burcot. SODC have recommended the following text to be inserted:</p> <hr/> <p>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.</p> <p>We recommend amending the last statement in this text: “...taking into account the guidance contained in the National Design Guide, National Model Design Code, and (when available) the Burcot and Clifton Hampden Design Code*” The addition of Burcot and Clifton Hampden Design Code to the text will act as a placeholder and only come into effect once the Design code document is created. The PC</p>

*to be included as part of a Neighbourhood Plan Review

		plan to commence work on this within the next two years, and this will be included as part of plan review in the future.
Policy	BCH5 required updating	The current list of assets is incomplete as it does not include: Burcot farm business park, petrol station, garage/shop, forge and The Close care home. These assets not only provide value services to the community, also local employment. PC will address this via a plan review in the future.
Maps	BCH7 Footpaths and Cycle Paths and BCH9 error in associated map	Policy map 1 and 3: This map does not show the complete network of footpaths and some are incorrectly located. For example, Watery Lane is marked on the map as a footpath, which is incorrect, and it does not include footpaths in Burcot. Accept and amend.

Issue	Summary of Comment	Parish Council Response
Policy	The NP should include a policy for Sustainable Transport.	<p>Several respondents commented that the NP should have a Sustainable Transport policy. We concur with residents that our transport network should be considered as part of a wider transport network and needs to cater for future requirements. The NP includes a policy BCH7 Footpaths and Cycle paths, but we now accept this falls short of considering those routes that link to bus services to Oxford or Wallingford via Berinsfield layby, and to train services from Culham, as well as connection to national cycle routes linking to Didcot Garden city, and Oxford, via Abingdon. New policies relating to sustainable living and travel in nearby cities, now need to be reflected in our NP to ensure it remains fit for purpose for its duration.</p> <p>It is also important in this policy to consider location of vehicle Electrical charging points, and suitable secure bike parking in car parks, and bus stops.</p> <p>The PC recommend leaving the policy BCH 7 unchanged and revising this policy via a plan review in the future.</p>

Map	BCH 9 Green infrastructure omission in associated map	Suggested amendments: The policy 3 map should include the ancient woodland, hedgerows, veteran trees or any trees with TPO referred to in the text. There should also be a mention here of the protection to the wildlife within the Conservation Area and the woodland and wildlife in Burcot. The river corridor is incorrectly marked as the river only, whereas it is important to identify a corridor of at least five metres along the north bank of the river, to conserve the riverine woodland and prevent further development and pollution.
Policy suggestion	Lack of policies relating to carbon reduction, light pollution, bio-diversity mitigations, preservation of the character and appearance of the conversation Area; all of which could be addressed with the inclusion of an Environmental policy	Our local environment plays a vital role in connecting key wildlife corridors and biospheres. The quality of the diverse habitats that include flora and fauna that sustain other species within the food system, notably fish, bats and birds which are impacted by noise, air and light pollution. Whilst it is noted by the Parish Council that we cannot influence changes outside the NP area, the value of such a policy is noted, and therefore the PC recommend addressing this via a plan review in the future.