

Brightwell-cum-Sotwell Parish Neighbourhood Development Plan – Post Adoption Statement in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC

3 MAY 2019

1 Introduction

1.1 The Neighbourhood Development Plan

The Brightwell-cum-Sotwell Neighbourhood Development Plan (NDP) was ‘made’ (adopted) by South Oxfordshire District Council (the District Council) on 12th October 2017 and now forms part of the South Oxfordshire Development Plan for the determination of planning applications in the Parish.

Once the Brightwell-cum-Sotwell Neighbourhood Plan was made, the District Council commissioned the production of an SEA adoption statement template from external consultants, to ensure that this SEA adoption statement complied with the relevant regulations.

In preparing the NDP, account was taken of the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive and its transposing regulations, the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

The SEA Directive and transposing regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is “to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”

In developing the NDP, proportionate, robust evidence should support the choices made and the approach taken. In terms of SEA and Sustainability Appraisal (SA), the Planning Practice Guidance (PPG) (paragraph 26, SEA and SA) states:

“There is no legal requirement for a neighbourhood plan to have a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. However, a qualifying body must demonstrate how its plan or order will contribute to achieving sustainable development. A sustainability appraisal may be a useful approach for doing this.”

Paragraph 27 of the PPG continues:

“In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental

assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects.”

Consistent with this guidance, the District Council completed a SEA Screening Opinion (February 2017) and concluded that the NDP was likely to have significant effects on the environment and that SEA was required. Consequently SEA was undertaken by the Brightwell-cum-Sotwell Parish Council (the authors of the NDP) comprising of:

- A Scoping Report dated October 2015
- Draft Sustainability Appraisal Report November 2016 for pre submission consultation
- Final Sustainability Appraisal Report February 2017 submitted to the Council

In assessing the emerging NDP and also in line with the PPG, the Brightwell-cum-Sotwell Parish Council decided to undertake a Sustainability Appraisal (SA) that was compliant with the SEA Directive but also considered wider social and economic effects. References to the ‘Environmental Report’ in this Post-Adoption Statement refer to the relevant SA Report.

The reports can be viewed at <http://www.brightwellcumsotwellpc.org/library.asp>. Hard copies of the reports can be viewed during the Parish Office opening hours by appointment with the clerk (01491 826968).

This Post Adoption Statement represents the conclusion of the SEA process and fulfils the plan and programme adoption requirements of the SEA Directive and SEA Regulations. This statement has been prepared in accordance with Regulation 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004, which require a statement to be produced on adoption of a plan or programme, to detail, in summary:

- how environmental considerations have been integrated into the NDP (Section 2 of this document);
- how the Environmental Report has been taken into account (Section 3);
- how opinions expressed in response to the consultation on the Draft NDP and Draft Environmental Report have been taken into account (Section 4);
- the reasons for choosing the NDP, as made, in the light of the other reasonable alternatives dealt with (Section 5); and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the NDP (Section 6).

2 HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE NDP

2.1 Environmental Considerations in the NDP

Preparation of the NDP

Environmental and wider sustainability considerations have been integral to the key decisions made in respect of the policies and proposals of the NDP. The integration of these considerations into the plan making process has principally been achieved through:

- the development of a proportionate evidence base on topics including (inter alia) housing, population and health, transport, landscape, air quality, biodiversity, flood risk, climatic factors;
- engagement with key stakeholders and the public on the emerging NDP and related environmental and sustainability matters;
- the consideration of national planning policy and the objectives of other plans and programmes, including those produced by the District Council; and
- ongoing assessment including SA (see **Section 2.2**) and screening under the Habitats Regulations.

NDP Content

The NDP plans positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework). This aim is expressed in the NDP Vision, which is:

“To retain our separate identity as a rural parish set within open countryside, conserving the character of the various settlements; in a way that allows the community to evolve whilst sustaining our core vital services.”

The Vision is supported by 6 Objectives in the NDP which are as follows:

- Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites
- Sustain the sensitive landscape setting of the main settlement and the intrinsic relationship between ‘village’ and ‘working farmland’ by avoiding harmful development in the AONB and by preventing any further elongation of the settlement into the countryside or precious village green spaces
- Encourage the use of well-located, non-productive, agricultural or horticulture land on the periphery of the main village to minimise the need for building on open green field land
- Sustain and enhance the character and appearance of the Conservation Areas and Listed Buildings of the Parish and their settings

- Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability
- Rebalance the community profile of the main village to help sustain the core village facilities by planning for new homes suited to first time buyers and young families and by enabling older residents to remain in the village and to make their larger homes available to new residents.

The NDP contains a number of policies to help realise the Vision and Objectives and help to deliver sustainable development. These are summarised in the table below.

Table 2.1 Summary of Issues and Policy Responses

Sustainability issues identified in the SA	Issues addressed by NDP objectives	NDP Policies/ Proposed Allocations
Affordability of all forms of housing within the Parish.	Rebalance the community profile of the main village to help sustain the core village facilities by planning for new homes suited to first time buyers and young families and by enabling older residents to remain in the village and to make their larger homes available to new residents.	BCS1, BCS2, BCS3, BCS4, BCS5A, BCS6
Difficulty of moving house within the Parish.	Rebalance the community profile of the main village to help sustain the core village facilities by planning for new homes suited to first time buyers and young families and by enabling older residents to remain in the village and to make their larger homes available to new residents.	BCS1, BCS2, BCS3, BCS4, BCS5A, BCS6
Little scope for downsizing.	Rebalance the community profile of the main village to help sustain the core village facilities by planning for new homes suited to first time buyers and young families and by enabling older residents to remain in the village and to make their larger homes available to new residents.	BCS1, BCS2, BCS3, BCS4, BCS5A, BCS6
Modern developments have tended to reduce the rural feel of the Parish	Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites. Encourage the use of well-located, non-productive, agricultural or horticulture land on the periphery of the main village to minimise the	BCS7, BCS8, BCS9, BCS10, BCS11

Sustainability issues identified in the SA	Issues addressed by NDP objectives	NDP Policies/ Proposed Allocations
	need for building on open green field land.	
Difficult for new entrants to the market and for older residents to downsize	Rebalance the community profile of the main village to help sustain the core village facilities by planning for new homes suited to first time buyers and young families and by enabling older residents to remain in the village and to make their larger homes available to new residents.	BCS1, BCS2, BCS3, BCS4, BCS5A, BCS6
Increasing traffic on the A4130 bisects the parish.	Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability.	BCS17
There is increasing noise and light pollution.	Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability.	BCS17
Developments risk affecting views to/from the AONB and causing visual coalescence with Wallingford.	Sustain the sensitive landscape setting of the main settlement and the intrinsic relationship between 'village' and 'working farmland' by avoiding harmful development in the AONB and by preventing any further elongation of the settlement into the countryside or precious village green spaces.	BCS7, BCS9, BCS10
Some fields adjacent to the main settlement are owned by land banks and the edge of settlement is poorly defined.	Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites. Encourage the use of well-located, non-productive, agricultural or horticulture land on the periphery of the main village to minimise the need for building on open green field land.	BCS7, BCS9, BCS10
Developments may increase risk of groundwater flooding or be subject to it.	Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability.	BCS17
Increased population will increase pressure on resources, possibly exacerbated by climate change.	Protect the remaining community core facilities and services from unnecessary loss and encourage	BCS17

Sustainability issues identified in the SA	Issues addressed by NDP objectives	NDP Policies/ Proposed Allocations
	proposals to sustain and improve their viability.	
Loss of gardens to infill and of traditional old orchards.	Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites.	BCS2, BCS7, BCS8, BCS9, BCS10, BCS11
Brownfield sites often rich on wildlife.	Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites.	BCS1, BCS2, BCS3, BCS4, BCS5A, BCS6, BCS7, BCS8, BCS9, BCS10, BCS11
Inappropriate development may cause significant detriment.	<p>Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites</p> <p>Sustain the sensitive landscape setting of the main settlement and the intrinsic relationship between 'village' and 'working farmland' by avoiding harmful development in the AONB and by preventing any further elongation of the settlement into the countryside or precious village green spaces.</p> <p>Sustain and enhance the character and appearance of the Conservation Areas and Listed Buildings of the Parish and their settings.</p>	BCS7, BCS9, BCS10
Inappropriate speed limits.	Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability.	BCS17
Excessive on-street parking.	Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability.	BCS17
Safety of cyclists and walkers.	Protect the remaining community core facilities and services from	BCS17

Sustainability issues identified in the SA	Issues addressed by NDP objectives	NDP Policies/ Proposed Allocations
	unnecessary loss and encourage proposals to sustain and improve their viability.	
Modern developments and subsequent loss of vegetation have tended to reduce the rural feel of the Parish	Sustain the sensitive landscape setting of the main settlement and the intrinsic relationship between 'village' and 'working farmland' by avoiding harmful development in the AONB and by preventing any further elongation of the settlement into the countryside or precious village green spaces.	BCS7, BCS8, BCS9, BCS10, BCS11

2.2 Environmental and Sustainability Considerations in the SEA/SA

To provide the context for the SEA/SA, and in compliance with the SEA Directive, a proportionate review of other relevant plans and programmes was undertaken and the relevant aspects of the current state of the environment and its evolution without the NDP were considered; together, they informed the identification of a series of key sustainability issues. This information was set out in the Scoping Report (October 2015) and informed the Environmental Report, which was subsequently updated to reflect changes since the Scoping Report was published.

The key sustainability issues identified through the review of plans and programmes and analysis of baseline information informed, and were reflected in, the objectives and criteria that comprised the framework used to appraise the NDP (the SEA Framework) (see **Table 2.2**). Broadly, the SEA objectives presented the preferred sustainability outcome which usually involved minimising detrimental effects and enhancing positive effects.

Table 2.2: The SEA/SA Framework

Key Message from Policy Context	Sustainability Objective
Increase housing supply, especially affordable housing	<ul style="list-style-type: none"> To help provide existing and future residents with an opportunity to live in a decent home, by delivering at least 10 new homes within the plan period
Improve the quality and design of existing and new housing	<ul style="list-style-type: none"> New development to enhance the overall quality and character of the Parish and maintain a strong sense of place
Improve the mix of housing size and tenure	<ul style="list-style-type: none"> To help ensure suitable homes are available to all sectors of the community
Preservation and enhancement of the rural landscape and sense of place	<ul style="list-style-type: none"> To conserve the rural nature of the parish as a vital lung for all surrounding settlements. To protect and maintain the network of rights of way. To protect and maintain important views, including those out and to the main settlements.
Risk of Flooding	<ul style="list-style-type: none"> To ensure flood risk from all sources is managed effectively and sustainably

Key Message from Policy Context	Sustainability Objective
Risk of drought and water shortage	<ul style="list-style-type: none"> • To support the protection, improvement and sustainable use of water resources
Threats to biodiversity and opportunities to enhance it	<ul style="list-style-type: none"> • To conserve and enhance biodiversity
Heritage assets and the historic environment are irreplaceable resources	<ul style="list-style-type: none"> • To conserve and enhance the Parish's built heritage for its historic significance and important contribution to local distinctiveness, character and sense of place
Increasing use of the road network within and through the Parish	<ul style="list-style-type: none"> • To benefit the wellbeing of the community by the management of parking and traffic congestion • encouraging walking and cycling
Enhance the setting of new housing and conservation of rural setting	<ul style="list-style-type: none"> • To retain existing trees and hedgerows and design new landscaping to conserve and enhance the established character

The selection of objectives for the proposed framework reflects the general sustainability issues of the Parish and the policies in the Neighbourhood Plan. It has selected those objectives that are considered the most relevant information for this purpose. The decision not to choose any particular policy objective does not necessarily mean that the objective has no relevance to the Plan but that it is unlikely to enable the effects of policy options to be measured and is therefore unhelpful for this purpose.

The SEA/SA process considered the contribution of the NDP towards each of the appraisal objectives, drawing on the baseline information to predict the likely significant effects in line with the Office of the Deputy Prime Minister (now Ministry of Housing, Communities and Local Government) Practical Guide to the SEA Directive¹. Specifically, the following key components of the NDP were appraised against the SA objectives:

- Vision and Plan Objectives;
- Policies in the NDP and reasonable alternatives to those, including the do-nothing option where appropriate;
- Site allocations (including reasonable alternatives).

The appraisal identified the likely changes to the baseline conditions as a result of the NDP's implementation. These effects were described (where possible) in terms of their extent, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, short, medium and/or long-term. The potential for secondary, synergistic and cumulative effects were also considered and reported where relevant.

¹ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Published September 2005.

3 HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

3.1 Overview

The development of the NDP has been iterative. SEA/SA has played an integral role in this iterative process with each of the following NDP stages having been accompanied by an Environmental Report in order to help inform the Plan and fully integrate environmental and sustainability considerations into decision making.

Table 3.1 below lists the iterations of the NDP, corresponding Environmental Reports and key conclusions from the Environmental Report .

Table 3.1 Summary of SEA Iterations [

Report	Summary of the Accompanying SEA Environmental Report (what was appraised)	Key Conclusions from the SEA Environmental Report
Draft Sustainability Appraisal Report November 2016 for pre submission consultation	The report provides an assessment of the Neighbourhood Plan objectives and policies and alternatives for the location of new housing in the village – considering four broad locations for growth in the village (west, south, north, east).	<p>The assessment indicated that the preferred policies of the Pre Submission Plan avoided leading to any significant, negative environment effects and would contribute, in overall terms, to achieving a sustainable pattern of growth and consolidation in the village.</p> <p>The SA concluded that not all of the policies would have neutral effects. Some would have positive effects, especially in terms of enabling the village to contribute to meeting local housing need and providing a mix of new homes to address housing issues in the village itself. Others would collectively ensure that the distinctive character of the village would remain unharmed and improved through the reuse of redundant horticultural land. On the other hand, the assessment identified the potential for some marginal negative landscape effects of the proposals at Slade End.</p> <p>Having tested the alternative spatial strategies and the ‘no policy’ options, the SA concluded that they would not lead to a better sustainability outcome than the proposed policies. In some cases, notably in respect of heritage and landscape effects, the alternatives performed less well.</p>
Final Sustainability Appraisal Report February 2017	The report provides an assessment of the Neighbourhood Plan objectives and policies and reports on the appraisal of alternatives for the location of new	The assessment indicates that the preferred policies of the Submission Plan have avoided leading to any significant negative environment effects and will contribute, in overall terms, to achieving a

housing in the village – considering four broad locations for growth in the village (west, south, north, east) undertaken in November 2016. The provision of a settlement boundary is also appraised.

sustainable pattern of growth and consolidation in the village.

Conclusions in relation to policies, and the alternative spatial strategies were consistent with the previous SA.

3.2 Key conclusions from the SA Report

The assessment indicates that the preferred policies of the Submission Plan have avoided leading to any significant, negative environment effects and will contribute, in overall terms, to achieving a sustainable pattern of growth and consolidation in the village.

The SA Report concludes that the spatial strategy has found ways of infilling some of the edges of the village that retain its essential shape and character, without requiring incursions into the surrounding countryside. Its neutral effect in this regard contrasts with the negative effects of the reasonable alternative spatial options tested.

The SA concluded that not all the policies will have neutral effects. Some will have positive effects, especially in terms of enabling the village to contribute to meeting local housing need and providing a mix of new homes to address housing issues in the village itself. Others will collectively ensure that the distinctive character of the village will remain unharmed and improved through the reuse of redundant horticultural land. On the other hand, the assessment identified the potential for some marginal negative landscape effects of the proposals at Slade End.

Having tested the alternative spatial strategies and the ‘no policy’ options, the SA concluded that it was not likely that any of the alternatives assessed would lead to a better sustainability outcome than the preferred policies. In some cases, notably in respect of heritage and landscape effects, the alternatives assessed less well.

3.3 How the Findings of the SEA/SA Have Been Taken into Account

The SEA/SA has helped to shape the direction of the NDP. In particular, the findings of the SEA/SA of the emerging NDP and reasonable alternatives have informed decisions in respect of:

- The Neighbourhood Plan objectives
- the spatial policy and reasonable alternative spatial options;
- the selection of housing sites;

- the sites to be allocated in the NDP to deliver the overall quantum of growth.

The SA helped highlight key considerations in the formulation of policy, examples included:

- The SA of the NDP objective highlighted that the Plan objective of delivering homes to meet local needs has the potential for a range of negative effects, depending on where the development would be located in the Parish. Similarly, the Plan objective of reusing redundant agricultural and horticultural land in and around the village has the potential to have negative biodiversity, heritage and traffic effects if in the wrong location or if development is not properly planned for. This conclusion helped frame relevant policies;
- The SA process helped highlight the need to consider a settlement boundary policy and this was subsequently included in the NDP under Policy BCS1;
- Policies have been amended to include reference to the need to biodiversity off-setting;
- Policies BCS4 and BCS5 were framed to avoid potential negative effects in relation to the Conservation Area.

4 HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

4.1 Overview

As set out in Section 1, the development of the NDP has been informed by extensive, ongoing engagement and public consultation, in accordance with the Neighbourhood Planning (General) Regulations 2012 (SI No. 637).

A Consultation Statement was prepared for the NDP in accordance with Paragraph 15 (2)1 of the Regulations which defines a “consultation statement” as a document which:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
- (b) explains how they were consulted;*
- (c) summarises the main issues and concerns raised by the persons consulted; and*
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*

The Consultation Statement sets out the consultation undertaken during the preparation of the NDP, a summary of main issues raised and details of how the comments received have been taken into account.

4.2 SA Consultation Summary

Following consultation on the scope of the SA in October 2015, Environmental Reports have been prepared and published for consultation at each key NDP stage as set out **Table 3.1** above.

A Scoping Report, was consulted on for the minimum 5-week period during October and November 2014, in line with the Regulations.

The comments received on the proposed scope of sustainability objectives were supportive.

Details of the results of consultation at this stage are provided in the Consultation Report February 2017.

The draft Environmental Report accompanying the Regulation 14 (Pre-submission version of the NDP) was consulted on 23rd November 2016 for 7 weeks which concluded on 11th January 2017; a total of 42 responses were received and 4 of those were related to the SA which can be found in Appendix B.

The comments on the Draft SA/SEA were generally supportive of the appraisal and its evidence base. Historic England advised that the evidence base should be made clearer – the Historic Environment Record (HER) had been interrogated but this had not been referenced, the HER was subsequently referenced in policies where relevant. It also commented on the wording of some site allocation policies; the comments were addressed.

Natural England questioned the extent to which the SEA/SA could conclude that some proposals would not have negative landscape and biodiversity effects. In respect of the offsetting of unavoidable biodiversity loss, it is noted that Policy CSB1 of the Core Strategy (adopted in 2012, and part of the South Oxfordshire Development Plan) sets out how a net gain in biodiversity may be achieved. In response to the submission from Natural England, the policies in the NDP were amended accordingly. Natural England also requested a biodiversity strategy to deliver a net gain in biodiversity to offset the loss on the site allocations. Much of its comment on landscape effects relates to the AONB, which was addressed in the revised SA report.

IPE Orchestra Land submitted a representation identifying that the sustainability appraisal and specifically the scoring matrix should be reconsidered to take account of the implications of development on heritage, roads and rural character.

The District Council's response highlighted that the NDP did not use a settlement boundary policy mechanism to distinguish between built up areas and the countryside and that the SA should have considered the sustainability merits separately (of effects on built up area and the countryside). Policy BCS1 identifies a settlement boundary.

5. THE REASONS FOR CHOOSING THE NDP, AS ADOPTED, IN THE LIGHT OF THE OTHER REASONABLE ALTERNATIVES DEALT WITH

5.1 Overview

Article 5 (1) of the SEA Directive and SEA Regulation 12(2) require that “an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated”. Information to be provided includes “an outline of the reasons for selecting the alternatives dealt with” (SEA Directive Annex I (h) and SEA Regulations Schedule 2 (8)).

The European Commission guidance on the SEA Directive² discusses possible interpretations of handling ‘reasonable alternatives’ as required by Article 5(1). It states that “The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme”.

As set out in **Section 3**, the SEA has been an iterative process undertaken alongside and integrated with the development of the NDP itself. The reasonable alternatives considered in preparing the NDP and appraised through the SEA/SA have related to:

- development scenarios and the distribution of growth of the plan area;
- policy options (including the do-nothing option where relevant);
- identification of a settlement boundary; and
- site allocations

The findings of the appraisal of the preferred approach and reasonable alternatives were reported in the Environmental Reports at each stage of NDP preparation and subject to consultation with the wider community and relevant consultation bodies.

5.2 The Reasons for Choosing the Preferred Approach and for Rejecting Reasonable Alternatives

The SA Report sets out the reasons for choosing the preferred approach and for rejecting reasonable alternatives, this is summarised below.

The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to all but one of the policies is that of having no policy and relying upon other development plan policies or national policy. The assessment therefore considers how such an alternative would make any difference to the sustainability outcomes.

Policy BCS1 - The definition of the Brightwell Village Boundary in that policy is the outcome of the spatial strategy outlined in its supporting text. The boundary therefore accommodates a number of site allocations (in policies BCS2 – BCS5) that are consistent with that strategy.

The introduction to the Site Assessments Report explains in detail the relationship between it and the SA/ SEA appraisal methodology.

As neighbourhood plans cover much smaller areas than Strategic Housing Land Availability Assessments, they are able to consider a variety of spatial options for place making that is not possible for every Parish at the District scale. This allows for

² EC (2001) *Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment*. Available from http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Accessed June 2017].

more emphasis to be placed on defining and comparing spatial options before considering the role that an individual site may play in delivering one or more of those options.

The visioning and objective work that formed the basis of early community engagement activity on the Plan – and its predecessor Community Led Parish Plan 2014 to 2024 – provided a clear preference for the spatial strategy that the Plan must adopt to growing the village in the future. Essentially, the strategy focuses on avoiding incursions into the surrounding landscape and distributing growth using a mix of different types of site, leveraging community benefits wherever possible and reasonable to do so.

At the same time, site assessments were undertaken by the neighbourhood planning team to ascertain the availability and simple capacity of land in and around the main village. Each site was identified as being part of one of five spatial options:

- Preferred Option - Within the Village Envelope – defined as land contained within the observed settlement edge of the village
- Option A - West of the Village – defined as extending the village from its eastern boundary along Didcot Road to its west
- Option C - North of the Village – defined as extending the village from its northern boundary towards the by pass
- Option D - East of the Village – defined as extending the village from its eastern boundary towards Wallingford
- Option B South of the Village – defined as extending the village from its southern boundary towards Mackney

The availability and capacity of the sites, drawn from the District Council's 'call for sites' exercises, indicated that each of these spatial options would comprise sufficient land to deliver a total quantum of housing development to meet the District Council's expectations in the emerging Local Plan. Of the other available sites, land that was beyond the main village was excluded at the outset of being contrary to a range of national and adopted Core Strategy policies.

Option A is based on a spatial strategy that grows the village beyond its western boundary on either side of Didcot Road. In the Site Assessments Report, this option includes sites coded as 001 (Martin's Field) and 002 (Rectory Meadow). Option B is based on a spatial strategy that grows the village beyond its southern boundary, i.e. properties on Brightwell Street and down Mackney Lane. This option includes site 014 (The Haycroft). Option C is based on a spatial strategy that grows the village beyond its northern boundary between the A4112 and High Road and includes sites 005 (Triangle Piece), 006 (Green Hill), 007 (North of High Road), 011 (Sotwell Manor Fruit Farm) and 012 (Five and Half Acres). Option D is based on a spatial strategy that grows the village beyond its eastern boundary at Slade End to the Wallingford bypass and includes site 013 (Slade End Fields). All the sites that have been made available for assessment by the District Council for housing development lie within one of the spatial options.

These spatial options were tested during the preparation of the Draft SA/SEA, with the first (development within the village envelope) being identified as the preferred option and the others as Options A – D. Given the appraisal was of the spatial options, which contained all the relevant available sites, there was no need or value in appraising the individual sites. That exercise confirmed that the preferred option was most consistent with the framework of sustainability objectives when compared

to the alternatives. As a result, the Pre Submission Plan proposed the four site allocation policies that were consistent with the preferred option. In addition, Policy BCS1 of the Plan proposed to establish a new Village Boundary policy to contain growth to those sites and to suitable infill. Those sites that were located in one of the other spatial options were therefore not taken forward as site allocations as a) those options were not appraised as providing a more sustainable solution and b) there was no need to allocate any additional land.

In addition to this technical appraisal, the community engagement work gave a clear indication that none of the alternatives would be supported by a clear majority of voters at the referendum.

Development Scenarios

The emerging South Oxfordshire Local Plan 2033 will, when adopted, replace the Core Strategy and older saved policies. The BCSNP will sit alongside the core strategy and older saved policies whilst they are in force and will sit alongside the South Oxfordshire Local Plan 2033 once Adopted. The BCSNP will cover the period 2011 to 2033.

The District Council emerging local plan proposed that rural villages should look to plan for 5% - 10% growth in their total housing stock to 2032, taking into account their facilities and local environmental constraints. For the BCSNP, the main settlement (or 'village') and only settlement of any scale in the Parish is Brightwell-cum-Sotwell (with c. 450 total housing stock), this means growth in the order of 22 – 45 homes. In the first five years of the plan, the plan would need to allocate deliverable sites of at least one third of this number (8 – 15 homes). The remainder of this total would come from other deliverable sites (i.e. available now, meaning a greater supply of new homes delivered in the period to 2021) and from developable sites (i.e. those sites that are not ready to come forward before 2021 but are otherwise suitable for housing).

Provisions in the NDP accord with the latest evidence of housing need set out in the district councils emerging local plan.

Although the whole parish was considered for its development potential, it is considered that the main village is the most sustainable place for new housing and as such the spatial strategy has focused new housing development in this location. This scale of growth takes into account the latest Strategic Housing Market Assessment. The Core Strategy requires the mix of housing types on schemes to reflect local circumstances, which is expected to remain a requirement as this is consistent with the NPPF. A housing needs survey was carried out in the preparation of the BCSNP to help inform local housing need.

Having tested the alternative spatial strategies and the 'no policy' options, the SA concluded that it did not seem likely that any of the alternatives will lead to a better sustainability outcome than the proposed policies. In some cases, notably in respect of heritage and landscape effects, the alternatives assess less well.

Policies Included in the NDP

Neighbourhood plans are not obliged to contain policies addressing all types of development. The range and scope of policies to be included in the NDP was considered through production of draft versions of the NDP. Where relevant the do-nothing option was also considered. Relevant policy areas and reasonable alternatives are summarised below.

The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to all but one of the policies is that of having

no policy and relying upon other development plan policies or national policy. The assessment therefore considers how such an alternative would make any difference to the sustainability outcomes.

The SA concluded that the alternative of not using a settlement boundary policy device here may be seen as offering greater flexibility by enabling applications to come forward for housing, employment and other development adjoining the observed village edge. This would have stronger housing supply benefits on the one hand, but the potential for negative landscape and heritage effects on the other. But, this is to miss the point of a plan-led system, where the device is used to contain the unnecessary sprawl of settlements. The flexibility of the device is in its support in principle of development proposals that are respectively necessary or suitable to a settlement or countryside location, with only their design and access attributes determining whether or not they should be consented. Not defining the boundary leaves this distinction ambiguous for applicants, planning authority and local community alike, with the pursuit of ‘flexibility’ putting at risk sustainable outcomes. Provided the development plan (most likely the Neighbourhood Plan from this point on) is reviewed and the boundary updated on a five year cycle, there should be no positive effects of this alternative that would outweigh the positive effects of using the device.

In respect of the ‘Policy Off’ alternatives to all the other policies, the assessment was neutral. In no case was it possible to discern any clear positive or negative effect of not having the policy. At the margins, it may be possible that a reliance on other development plan policy or the national planning policy framework may lead to decisions on planning applications that do not achieve as high a quality outcome, but this cannot be said with any more certainty than that. Aside from the site specific policies, all the development management type policies are caveated in one way or another to indicate that support for development principles is dependent on their adherence to other development plan policies.

Site Options

Set out in the Table below is a summary of the site assessment work, phrased as the ‘pros’ and ‘cons’ of each site.

Site	Site Location & Spatial Option	Pros	Cons	Site allocation policy
BcSS 01	Martins Field Land to west of Waterman’s Lane (Spatial Option: West of the Village)	Access on to Didcot Road Distance to shop/PO	Land in agricultural production – arable. Extends village and outside settlement boundary. Close to AoNB, abutting it on western edge and north edge. Distance from school, pub and bus stop, recreation ground. Impact on views	Not allocated
BcSS 02	Rectory Meadow Land to south of Grove Cottages	Access on to Didcot Road Distance to shop/PO	Land in agricultural production – grazing. Extends village outside settlement boundary. Adjacent to Conservation area with impact on	Not allocated

Site	Site Location & Spatial Option	Pros	Cons	Site allocation policy
	and west of graveyard (Spatial Option: West of the Village)		views and setting of church and manor house. Restricted access. Distance from school, pub and bus stop.	
BcSS 03a	Little Martins (Land to east of Waterman's Lane) (Spatial Option: Village Envelope)	Access on to Didcot Road Distance to shop/PO	Land in agricultural production – grazing. Some sections scrubbed over producing potentially good habitats. Impact of access road on Watermans Lane. Distance from school and pub.	Policy BCS3- Land at Little Martins & Home Farm Barns
BcSS 03b	Home farm Barns (Land to east of Waterman's Lane) (Spatial Option: Village Envelope)	Reuse of redundant agricultural barns. Distance to shop/PO	Impact on Waterman's Lane of access road. Distance from school and pub.	Policy BCS3- Land at Little Martins & Home Farm Barns
BcSS 04	Land at Thorne's Nursery (Spatial Option: Village Envelope)	Reuse of redundant horticultural land. Adjacent to shop/PO and hall with potential to improve parking there. Potential to open up culverted watercourse.	Access is via Nursery Lane which is narrow and unmade. This will limit the number of properties that could be considered. Loss of 5 yr old scrub which could provide good habitats.	Policy BCS4- Land at Thornes Nursery
BcSS 05	Triangle Piece Land to north of High Road, western end. (Spatial Option: North of Village)	Proximity to school and bus stop	Located in AoNB. Extends village and outside settlement boundary. Distance from shop/PO. Impact on views.	Not allocated
BcSS 06	Green Hill (south) Land to north of High Road, central section (Spatial Option: North of Village)	Reasonable access. Proximity to school and bus stop	Located in AoNB. Extends village and outside settlement boundary. Distance from shop/PO. Impact on views.	Not allocated
BcSS 07	Land to north of High Road, eastern end (Spatial Option: North of Village)	Proximity to school and bus stop. Access difficult.	Located in AoNB. Extends village and outside settlement boundary. Distance from shop/PO. Access could be difficult. Impact on views.	Not allocated

Site	Site Location & Spatial Option	Pros	Cons	Site allocation policy
BcSS 08	Bosleys Orchard (Spatial Option: Village Envelope)	Reuse of former orchard. Well related to village and bordered on three sides by housing. Access acceptable. Proximity to bus stop, school and pub.	Located adjacent to AoNB. Potential loss of scrub. Red kite nest. Distance from shop/PO. Impact on views.	Policy BCS2 – Land at Bosley's Orchard
BcSS 09	Elliot's Orchard Land to west of Well Springs (Spatial Option: Village Envelope)	Proximity to village facilities.	Access is not possible without requiring unacceptable footpath widening across stream and pond at Well Springs. Land has scrubbed over, lies in Conservation Area and forms part of Green Heart of village. Loss of scrub which could provide good habitats. Impact on views.	Not allocated
BcSS 10a	Land at Slade End Green, Slade End Farm (Spatial Option: Village Envelope)	Reuse of redundant farm buildings. Within settlement boundary. Good access. Opportunity to recreate one of earliest nuclei of the village when taken with other related sites.	Distance from village facilities. Loss of scrub which could provide good habitats. Surface water drainage issues will need to be resolved.	Policy BCS5- Slade End Green Policy BCS5A- Slade End Farm
BcSS 10b	Land at Slade End Green, Strange's (Slade End) Nursery (Spatial Option: Village Envelope)	Reuse of redundant nursery. Within settlement boundary. Good access. Opportunity to recreate one of earliest nuclei of the village when taken with other related sites.	Distance from village facilities. Loss of scrub which could provide good habitats. Surface water drainage issues will need to be resolved.	Policy BCS5B- Strange's (Slade End) Nursery
BcSS 10c	Land at Slade End Green, (Spatial Option: Village Envelope)	Reuse of redundant nursery. Within settlement boundary. Good access. Opportunity to recreate one of earliest nuclei of the village when taken with other related sites.	Distance from village facilities. Loss of scrub which could provide good habitats. Surface water drainage issues will need to be resolved.	BCS5C- Slade End South to West Green Lane
BcSS 11	Sotwell Manor Fruit	Footpath to village.	Distance from village facilities. Land currently	Not allocated

Site	Site Location & Spatial Option	Pros	Cons	Site allocation policy
	Farm (Spatial Option: North of Village)		in use as nursery. Poor access (A4130 only - separating estate from village for vehicles). Adjacent to AoNB, impact on views.	
BcSS 12	Five and Half Acres (Spatial Option: North of Village)	Footpath to village	Distance from village facilities. Land currently in use as paddocks with some scrub. Poor access (A4130 only - separating estate from village for vehicles). Adjacent to AoNB, impact on views.	Not allocated
BcSS 13	Slade End Fields Land to east of village by Wallingford Bypass (Spatial Option: East of Village)	Access possible on to The Street.	Land in agricultural crop production. Outside settlement boundary and adjacent to Conservation area. Remote from village centre, extends village in to the Slade End gap giving rise to coalescence with Wallingford. Adjacent to AoNB with impact on views. Footpath across site.	Not allocated
BcSS 14	The Haycroft Land to the south of The Street (opposite garage) (Spatial Option: South of Village)	Proximity to village facilities.	Open land used for occasional car parking and occasional village events. Outside main settlement. Partly within Conservation Area. Crossed by footpath. Impact on key views from village and setting of conservation area and listed buildings. Access poor.	Not allocated

THE MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT ENVIRONMENTAL AND SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE NDP

6.1 Overview

The SEA Regulations (17 (1)) set out that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*”.

The District Council is the responsible authority for the purposes of monitoring the NDP. Planning Practice Guidance states:

“Monitoring the significant effects of the implementation of a neighbourhood plan that was subject to a strategic environmental assessment should be undertaken (see regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004). This will enable unforeseen adverse effects to be identified at an early stage and to enable appropriate remedial actions. The local planning authority should consider arrangements to monitor the significant effects of implementing the neighbourhood plan and reporting this issue in its Monitoring Report.”

The District Council is developing a suite of monitoring indicators that cover the topics identified in the SEA Directive. These will be used to monitor the effects of the Development Plan, including the Brightwell cum Sotwell NDP. Appendix A sets out the proposed monitoring indicators for the Local Plan and how they relate to the SEA topics that will be used prior to adoption of the Local Plan. These will be finalised once the Local Plan is adopted. The Council’s Authority Monitoring Plan will be produced annually with information updated as it becomes available.

The Qualifying Body is not obliged to produce additional indicators for monitoring at the local level but may do so if it wishes. The Qualifying Body would be responsible for monitoring any additional indicators. The Parish Council has indicated in the final SA Report that it will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table C of the SA Report. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data to report on the progress of the plan. It is likely the Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.

APPENDIX A: MONITORING INDICATORS FOR THE LOCAL PLAN AND RELATIONSHIP THE SEA DIRECTIVE (Appendix R Monitoring - Sustainability Appraisal of the Submission Version of the Local Plan 2019 – Appendices - March 2019)

Review of Proposed Monitoring Indicators against the Topics in the SEA Directive

Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
STRAT1: The Overall Strategy	Covered by all other indicators in framework -see below	See below	See below
STRAT2: South Oxfordshire Housing and Employment Requirements	<ul style="list-style-type: none"> <input type="checkbox"/> Number of dwellings permitted and completed in the district to meet the overall need <input type="checkbox"/> Progress towards meeting South Oxfordshire’s portion of unmet need in the housing market area <input type="checkbox"/> Number of dwellings permitted and completed in the district to meet the overall need <input type="checkbox"/> Quantum of land permitted and completed for employment by strategic site and allocation <input type="checkbox"/> Number of Homes delivered at the Grenoble Road, Northfield, and North of Bayswater Brook strategic allocations 	1. ‘Housing’. 13. ‘Employment’ 14. ‘Science Vale.’	Population
Strat3: Didcot Garden Town	<ul style="list-style-type: none"> <input type="checkbox"/> Number of planning permissions granted contrary to the Didcot Garden Town Masterplan Principles 	The design principles cover design, local character, density and tenure, transport and movement, heritage, landscape and green infrastructure and social and community benefits. As such this indicator is relevant to a number of SA Objectives, including: 1 ‘Housing’ 2 ‘Community safety’ 3 ‘Access to facilities’	Population, Human health, Material assets, Biodiversity, Flora and Fauna, Cultural heritage, Landscape

Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
4 'Health and wellbeing' 5 'Environmental protection' 6 'Travel choice 7 Biodiversity 9 Historic environments 17 Community involvement			
STRAT4: Strategic Development	<input type="checkbox"/> Progress of essential strategic infrastructure items <input type="checkbox"/> Progress of other Strategic infrastructure items	1 'Housing.' 3 'Access to facilities 10 Climatic factors	Population, Material assets
STRAT5: Residential Density	<input type="checkbox"/> Average density for major developments permitted by strategic allocation and location	8 Land use	Material assets
Strat6: Green Belt	<input type="checkbox"/> Status and type of permissions granted within the Green Belt	8 Land use	Biodiversity, Flora and Fauna, Soil
Strat7: Land at Chalgrove Airfield	<input type="checkbox"/> Progress of Masterplan for the strategic allocation <input type="checkbox"/> Number of homes permitted and delivered at strategic allocation <input type="checkbox"/> Quantum of employment land permitted and completed at strategic allocation <input type="checkbox"/> Number of pitches permitted and delivered for Gypsies and Travellers	1 'Housing' 13 'Employment'	Population

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
STRAT8: Culham Science Centre	<input type="checkbox"/> Quantum of employment land permitted and completed Culham Science Centre	13 'Employment' 14 'Science Vale'	Population
STRAT9: Land Adjacent to Culham Science Centre	<input type="checkbox"/> Progress of Masterplan for the strategic allocation: <input type="checkbox"/> Number of homes permitted and delivered at strategic allocation <input type="checkbox"/> Number of pitches permitted and delivered for Gypsies and Travellers	1 'Housing'	Population
STRAT10: Land at Berinsfield	<input type="checkbox"/> Progress of Masterplan for the strategic allocation <input type="checkbox"/> Number of homes permitted and delivered at strategic allocation <input type="checkbox"/> Quantum of employment land permitted and completed at strategic allocation.	1 'Housing' 13 'Employment'	Population

Strat 10i: Berinsfield Local Green Space	<input type="checkbox"/> Status and type of permissions granted on land identified	3 'Access to facilities'	Population, Human health
Strat 11: Land South of Grenoble road	<input type="checkbox"/> Progress of Masterplan for the strategic allocation <input type="checkbox"/> Number of homes permitted and delivered at strategic allocation <input type="checkbox"/> Quantum of employment land permitted and completed at strategic allocation	1. 'Housing'. 13. 'Employment'	
Strat 12: Land at Northfield	<input type="checkbox"/> Progress of Masterplan for the strategic allocation <input type="checkbox"/> Number of homes permitted and delivered at strategic allocation	1 'Housing'	Population
Strat 13: Land North of Bayswater Brook	<input type="checkbox"/> Progress of Masterplan for the strategic allocation <input type="checkbox"/> Number of homes permitted and delivered at strategic allocation	1 'Housing'	Population

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Strat 14: Land at Wheatley Campus, Oxford Brookes University	<input type="checkbox"/> Number of homes permitted and delivered at strategic allocation	1 Housing	Population
Policy HEN 1: The Strategy for Henley-on-Thames	<input type="checkbox"/> Number of homes permitted and delivered in the Parish of Henley-on-Thames <input type="checkbox"/> Quantum of employment land permitted and completed in the parish of Henley-on-Thames <input type="checkbox"/> Quantum of retail floorspace permitted and completed in the parish of Henley-on-Thames	1 'Housing' 13 'Employment'	Population
Policy TH1: The strategy for Thame	<input type="checkbox"/> Number of homes permitted and delivered in the Parish of Thame <input type="checkbox"/> Quantum of employment land permitted and completed in the parish of Thame <input type="checkbox"/> Quantum of retail floorspace permitted and completed in the parish of Thame	1 'Housing' 13 'Employment'	Population
Policy WAL1:	<input type="checkbox"/> Number of homes permitted and delivered in the Parish of Wallingford <input type="checkbox"/> Quantum of employment land permitted and completed in the parish of Wallingford <input type="checkbox"/> Quantum of retail floorspace permitted and completed in the parish of Wallingford	1 'Housing' 13 'Employment'	Population
Policy H1: Delivering New Homes	<input type="checkbox"/> Covered by all other housing indicators	See below	See below
Policy H2: New Housing in Didcot	<input type="checkbox"/> Number of homes permitted and completed in Didcot by strategic allocation	1 'Housing'	Population
Policy H3: Housing in the towns of Henley-on-	<input type="checkbox"/> Number of homes permitted and completed in the towns of Henley-on-Thames, Thame and Wallingford	1 'Housing'	Population

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Thames, Thame and Wallingford			
Policy H4: Housing in the Larger Villages	<input type="checkbox"/> Number of homes permitted and completed by Larger Village	1 'Housing'	Population
Policy H5: Land to the West of Priest Close, Nettlebed	<input type="checkbox"/> Homes permitted and completed on allocated site	1 'Housing'	Population
Policy H6: Joyce Grove, Nettlebed	<input type="checkbox"/> Homes permitted and completed on allocated site	1 'Housing'	Population
Policy H7: Land to the South and West of Nettlebed Service Station	<input type="checkbox"/> Homes permitted and completed on allocated site	1 'Housing'	Population
Policy H8: Housing in the Smaller Villages	<input type="checkbox"/> Number of homes permitted and completed by Smaller Village	1 'Housing'	Population
Policy H9: Affordable Housing	<input type="checkbox"/> Percentage of affordable housing provided on major developments or sites with combined gross floorspace of more than 1000m ²	1 'Housing'	Population
Policy H10: Exception Sites	<input type="checkbox"/> Status of permissions granted for rural exception sites	1 'Housing'	Population
Policy H11: Housing Mix	<input type="checkbox"/> Average housing mix of planning permissions	1 'Housing'	Population
Policy H12: Self Build and Custom Housing	<input type="checkbox"/> Number of registered interests on the self and custom build register compared with the potential supply of self and custom build housing <input type="checkbox"/> Proportion of self and custom build plots on strategic allocations		

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy H13: Specialist Housing for Older People	<input type="checkbox"/> Number of pitches permitted and delivered for Gypsies and Travellers by location	1 'Housing'	Population
Policy H14: Provision for Gypsies, Travellers and Travelling Showpeople	<input type="checkbox"/> Number of pitches permitted and delivered for Gypsies and Travellers by location	1 'Housing'	Population

Policy H15: Safeguarding Gypsy, traveller and travelling Showpeople sites	<input type="checkbox"/> Status and type of permissions granted on Safeguarded Gypsy, Traveller and travelling Showpeople sites	1 'Housing'	Population
Policy H16: Infill Development and Redevelopment	<input type="checkbox"/> Status and type of housing permitted not in accordance with policy	1 'Housing'	Population
Policy H17: Sub-division and Conversion to Multiple Occupation	<input type="checkbox"/> Status and type of permissions relating to sub-divisions houses of multiple occupation	1 'Housing'	Population
Policy H18: Replacement Dwellings	<input type="checkbox"/> Status and type of replacement housing permissions in the open countryside	1 'Housing' 8 'Land use'	Population Landscape
Policy H19: Re-use of rural buildings	<input type="checkbox"/> Status and type of housing permissions in the open countryside	1 'Housing' 8 'Land use'	Population Landscape
Policy H20: Rural Workers Dwellings	<input type="checkbox"/> Status and type of Rural Worker Dwelling application	1 'Housing'	Population
Policy H21: Extensions to Dwellings	<input type="checkbox"/> Status and type of permissions	1 'Housing'	Population

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy EMP6: New Employment Land at Thame	<input type="checkbox"/> Quantum of employment land permitted and completed at Thame	13 'Employment'	Population
Policy EMP7: New Employment Land at Wallingford	<input type="checkbox"/> Quantum of employment land permitted and completed at Wallingford	13 'Employment'	Population
Policy EMP8: New Employment Land at Crowmarsh Gifford	<input type="checkbox"/> Quantum of employment land allocated, permitted and completed	13 'Employment'	Population
Policy EMP9: New Employment Land at Chalgrove	<input type="checkbox"/> Quantum of employment land permitted and completed at Land at Monument Business Park	13 'Employment'	Population
Policy EMP10: Community Employment Plans	<input type="checkbox"/> Number of applications for Major developments supported by a community employment plan	13 'Employment' 15 'Education and Skills'	Population

Policy EMP11: Development in the Countryside and Rural Areas	<input type="checkbox"/> Status and type of applications for employment uses in the open countryside	1 'Housing' 8 'Land use' 13 'Employment' 15 'Education and Skills'	Population Landscape
Policy EMP12: Tourism	<input type="checkbox"/> Status and type of permissions granted for visitor economic developments.	8 'Land use' 13 'Employment'	Population Landscape

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
15 'Education and Skills'			
Policy EMP13: Caravan and Camping Sites	<input type="checkbox"/> Status and Type of permissions granted for Caravan and Camping Sites	8 'Land use'	Landscape
EMP14: Retention of Visitor Accommodation	<input type="checkbox"/> Amount of C1 use floorspace lost	13 'Employment' 16 'Tourism'	
Policy INF1: Infrastructure Provision	<input type="checkbox"/> Covered by all other infrastructure indicators	See below	See below
Policy TRANS1a: Supporting Strategic Transport Investment across the Oxford to Cambridge Arc:	<input type="checkbox"/> Progress of Oxford to Cambridge Arc	1 'Housing' 6 'Travel Choice' 10 'Climatic factors'	Population Material assets Climatic factors
Policy TRANS1b: Supporting Strategic Transport Investment	<input type="checkbox"/> Progress of transport projects identified in the Local Transport Plan	1 'Housing' 6 'Travel Choice' 10 'Climatic factors'	Population Material assets Climatic factors
Policy TRANS2: Promoting Sustainable Transport and Accessibility	<input type="checkbox"/> Monitoring of Travel Plans for developments over 80 dwellings <input type="checkbox"/> Progress of transport schemes <input type="checkbox"/> To monitor designated Air Quality Management Areas	1 'Housing' 5 'Environmental protection' 6 'Travel Choice' 10 'Climatic factors'	Population Material assets Climatic factors Air

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes	<input type="checkbox"/> Status and use of planning permissions on land safeguarded	1 'Housing' 6 'Travel choice'	Population Material assets
Policy TRANS4: Transport Assessments, Transport Statements and Travel Plans	<input type="checkbox"/> Monitoring of Travel Plans for developments over 80 dwellings	1 'Housing' 5 'Environmental protection' 6 'Travel choice'	Population Material assets Climatic factors Air
Policy TRANS5: Consideration of development Proposals	<input type="checkbox"/> Number of permissions granted against technical advice	1 'Housing' 5 'Environmental protection' 6 'Travel choice'	Population Material assets Climatic factors Air
Policy TRANS6: Rail	<input type="checkbox"/> Status and type of planning permissions related to rail services	5 'Environmental protection' 6 'Travel choice'	Population Climatic Factors Air
Policy TRANS7: Development Generating New Lorry Movements	<input type="checkbox"/> Number of permissions granted against technical advice	5 'Environmental protection' 6 'Travel choice' 10 'Climate Change'	Population Material assets Climatic factors Air
Policy INF2: Electronic Communications	<input type="checkbox"/> Compliance with Building Regulations	8 'Land-use'	Landscape

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy INF3: Telecommunications Technology	<input type="checkbox"/> Number of planning permissions refused	8 'Land-use'	Landscape
Policy INF4: Water and Waste Water Resources	<input type="checkbox"/> Number of planning permissions granted against technical advice	5 'Environmental protection' 11 'Flood Risk'	Biodiversity, fauna, and flora Water
Policy ENV1: Landscape and Countryside	<input type="checkbox"/>		

Policy ENV2: Biodiversity Designated sites, Priority Habitats and Species	<input type="checkbox"/> Changes in areas of Priority Habitats and Species <input type="checkbox"/> Number of permissions granted contrary to consultee advice on impact on Special Areas of Conservation <input type="checkbox"/> Number of permissions granted contrary to consultee advice on impact on SSSI's	7 'Biodiversity'	Biodiversity, fauna, and flora
Policy ENV3: Non Designated Sites, Habitats and Species	<input type="checkbox"/> Change in biodiversity area and/or sites	7 'Biodiversity'	Biodiversity, fauna, and flora
Policy ENV4: Watercourses	<input type="checkbox"/> Number of planning permissions granted against technical advice	10 'Climate Change' 11 'Flood Risk'	Human health Water Climatic factors
Policy ENV5: Green Infrastructure in New Developments	<input type="checkbox"/> Number of planning permissions granted against technical advice <input type="checkbox"/> Number of buildings on the 'Heritage at Risk' Register <input type="checkbox"/> Number of new Conservation Area Character Appraisals	7 'Biodiversity' 8 'Land-use' 9 'Built-heritage'	Biodiversity, fauna, and flora Human health Climatic factors

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy ENV6: Historic Environment	<input type="checkbox"/> Progress of Heritage Partnership Agreements	8 'Land-use' 9 'Built-heritage'	Cultural Heritage
Policy ENV7: Listed Buildings	<input type="checkbox"/> Number of planning permissions granted against technical advice	8 'Land-use' 9 'Built-heritage'	Cultural Heritage
Policy ENV8: Conservation Areas	<input type="checkbox"/> Number of planning permissions granted against technical advice	8 'Land-use' 9 'Built-heritage'	Cultural Heritage
Policy ENV9: Archaeology and Scheduled Monuments	<input type="checkbox"/> Status and type of planning permissions	8 'Land-use' 9 'Built-heritage'	Cultural Heritage
Policy ENV10: Historic Battlefields, Registered Park and Gardens and Historic Landscapes	<input type="checkbox"/> Status and type of planning permissions	8 'Land-use' 9 'Built-heritage'	Cultural Heritage
Policy ENV11: Pollution- - Impact from existing and/or Previous Land uses on new Development and the Natural Environment	<input type="checkbox"/> Number of planning permissions granted against technical advice	1 'Housing' 2 'Environmental Protection' 8 'Land-use'	Population Human health Soil Air Material assets Climatic factors

(Potential receptors of Pollution)			
Policy ENV12: Pollution Impact of Development on Human Health, the natural	<input type="checkbox"/> Number of planning permissions granted against technical advice	1 'Housing'	Population Human health

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
environment and/or Local amenity (Potential Sources of Pollution)	5 'Environmental Protection' 8 'Land-use'	Soil Air Material assets Climatic factors	
Policy EP1: Air Quality	<input type="checkbox"/> To monitor designated Air Quality Management Areas	5 'Environmental Protection'	Air
Policy EP2: Hazardous Substances	<input type="checkbox"/> Number of planning permissions granted against technical advice	5 'Environmental Protection' 8 'Land-use'	Air Soil Material Assets
Policy EP3: Waste collection and Recycling	<input type="checkbox"/> Percentage of household waste sent for re-use, recycling or composting	12 'Waste'	Material Assets
Policy EP4: Flood Risk	<input type="checkbox"/> Number and detail of permissions granted contrary to Environment Agency advice on flooding	11 'Flood Risk'	Climatic Factors
Policy EP5: Minerals Safeguarding Areas	<input type="checkbox"/> Status and use of planning permissions on land safeguarded.	8 'Land-use'	Material Assets Soil
Policy DES1: Delivering High Quality Development	<input type="checkbox"/> Covered by all other design indicators	See Below	See Below
Policy DES2: Enhancing Local Character	<input type="checkbox"/> Number of planning permissions granted against technical advice	1 'Housing' 8 'Land-use'	Population Material Assets

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy DES3: Design and Access Statements	<input type="checkbox"/> Number of permissions granted for major development supported by an appropriate masterplan and design and access statement.	1 'Housing' 13 'Employment'	Population

Policy DES4: Masterplans for Allocated Sites and Major Development	<input type="checkbox"/> Covered by indicator for DES3	See DES3.	See DES3.
Policy DES5: Outdoor Amenity Space	<input type="checkbox"/> Covered by indicator for DES3	See DES3.	See DES3.
Policy DES6: Residential Amenity	<input type="checkbox"/> Covered by indicator for DES3	See DES3.	See DES3.
Policy DES7: Public Art	<input type="checkbox"/> Number of permissions granted for major development, or sites larger than 0.5 hectares, that incorporate public art provision	1 'Housing' 13 'Employment'	Population
Policy DES8: Efficient use of resources	<input type="checkbox"/> Covered by indicators for STRAT12, EP1 and EP3	See STRAT12, EP1 and EP3	See STRAT12, EP1 and EP3
Policy DES9: Promoting Sustainable Design	<input type="checkbox"/> Number of permissions granted that incorporate climate change adaptation measures.	5 Environmental Protection 8 'Land-use' 9 'Built Heritage' 10 'Climatic factors'	Air Soil Climate Factors Material Assets Cultural Heritage Landscape
Policy DES10: Renewable Energy	<input type="checkbox"/> Status and type of permission granted for renewable energy	8 'Land-use'	Material Assets

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
<input type="checkbox"/> Renewable energy capacity	10 'Climatic factors'	Climatic Factors Material Assets	
Policy TC1: Retail and Services Growth	<input type="checkbox"/> Net change in comparison and convenience retail floorspace	3 'Access to Facilities' 13 'Employment'	Population Material Assets
Policy TC2: Retail Hierarchy	<input type="checkbox"/> A use class development permitted by settlement hierarchy <input type="checkbox"/> Number of applications approved and refused for 500m2 or greater accompanied with a Retail Impact Assessment	3 'Access to Facilities' 13 'Employment'	Population Material Assets
Policy TC3: Comparison goods floorspace requirements	<input type="checkbox"/> Comparison retail floorspace permitted by settlement hierarchy	3 'Access to Facilities' 13 'Employment'	Population Material Assets

Policy TC4: Convenience floorspace provision in the Market Towns	<input type="checkbox"/> Provision of convenience floorspace (sqm retail floor space) at Henley, Thame and Wallingford	3 'Access to Facilities' 13 'Employment'	Population Material Assets
Policy TC5 – Primary Shopping Areas	<input type="checkbox"/> Number of planning permissions granted resulting in loss of retail floorspace in Primary Shopping Areas	3 'Access to Facilities' 13 'Employment'	Population Material Assets
Policy CF1: Safeguarding Community Facilities	<input type="checkbox"/> Number of community facilities ¹ lost	3 'Access to Facilities' 4 'Health'	Population Human Health

¹ These include use facilities under A1, A2, A3, A4, A5, D1 and D2 use classes.

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Local Plan Policy	Indicators from the Local Plan	Sustainability Objective(s)	SEA Topic
Policy CF2: Provision of Community Facilities and Services	<input type="checkbox"/> Status and type of permissions for community facilities	3 'Access to Facilities' 4 'Health' 7 'Biodiversity'	Biodiversity, fauna and flora Population Human Health
Policy CF3: New Open Space, Sport and Recreation Facilities	<input type="checkbox"/> Provision of sporting facilities	3 'Access to Facilities' 4 'Health' 7 'Biodiversity'	Biodiversity, fauna and flora Population Human Health
Policy CF4: Existing Open Space, Sport and Recreation Facilities	<input type="checkbox"/> Number of permissions leading to the loss of open space, sport and recreation facilities	3 'Access to Facilities' 4 'Health' 7 'Biodiversity'	Biodiversity, fauna and flora Population Human Health

Appendix B

Representation from Natural England

Date: 03 January 2017
Our ref: 202244



The Parish Office
The Village Hall
West End
Brightwell cum Sotwell
OX10 0RY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Lucy Dalby

Planning Consultation: Brightwell-cum-Sotwell Neighbourhood Plan Pre-Submission Report and the Draft Sustainability Appraisal Report.

Thank you for your consultation on the above dated 23rd November 2016.

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 our interests would be affected by the policies made.

Brightwell-cum-Sotwell Neighbourhood Plan Pre-Submission Report

In our review of the Pre-Submission Report we would like to commend the policies supporting connected wildlife corridors as part of development in the parish. Connected open greenspace, wild greenspace and green infrastructure can all be used to create connected habitat suitable for species adaptation to climate change. We also support the green infrastructure policies including BSC10 Local green spaces, BSC11 Trees, hedgerows and wildlife corridors and BSC12 Footpaths and bridleways.

We would like to see an explicit biodiversity policy covering biodiversity 'net gain' for all development as part of the Green Infrastructure and Biodiversity Policies section. It would also be advisable to state in Landscape Policies section that no development is planned within the North Wessex Downs AONB.

Policies BCS2-BCS5 all propose development on greenspace or wild habitat areas within the new settlement boundary. This will result in a significant loss of biodiversity within the parish if not sufficiently mitigated. Each of these policies should include an explicit statement requiring development proposals to have a biodiversity 'net gain' for the parish. Suitable methods for assessing biodiversity impacts can include the Defra biodiversity offsetting metric¹ and the environment bank biodiversity impact calculator².

The number of sites proposed is also of concern but may provide some opportunities. The housing need assessment concluded a need of 50 new homes. Policies BCS2-BCS5 allow for at least 61 homes but more likely around 70 homes including the undefined allocation at BSC5a. It would

¹ <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

² <http://www.environmentbank.com/impact-calculator.php>, and http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbl0aDQAhVMDcAKHb8IDEUQFqgsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJJQ_UN0044Qe6rmiLffxckg

therefore be possible to allocate more area to connected greenspace to compensate for the impacts of development.

Policy BCS2 allocates land directly adjacent to the North Wessex Downs AONB. Policy BCS3 allocates land on the edge of the settlement facing the AONB. The Neighbourhood Plan states often that the village is invisible in the landscape. This attribute would need to continue for the development at Bosley's Orchard and Little Martins Home Farm Barns not to have an impact on the AONB. A Landscape and Visual Impact Assessment (LVIA) should be carried out for these sites. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance. If this assessment is unfeasible within the Neighbourhood Plan then a LVIA needs to be included as an explicit policy requirement for the future development of these sites.

One final small thing, the pictures and maps within the report are of a very poor quality. It was hard to comment on some of the information shown in them.

Draft Sustainability Appraisal Report

The Draft Sustainability report focuses heavily on the provision of housing with less of a focus on the environmental impacts. However, with a few added paragraphs and policies on visual landscape impact assessment and biodiversity 'net gain' this could be easily rectified.

Table E has no effect (0) on the landscape for policies BCS2 and BCS3. It is our opinion that not enough assessment has been conducted to conclude no visual landscape impacts on the AONB. These should be changed to 0/- (which I am assuming is no impact / negative impacts). There is no key to this table's symbols.

Paragraph 8.6 states; "...in consolidating new development within the main village form and not requiring further extensions into the landscape, the policy avoids a negative landscape effect...". The proposed development site at Little Martins (BCS3) is on the western edge of the settlement and extends the urban footprint into the rural landscape. Together with Thornes Nursery (BCS4) they take up a large area of green space with possible views both towards the AONB and from within the AONB into the development site. More detail needs to be provided as to how visual landscape impacts will be avoided at this site.

The majority of visual landscape impacts and mitigation options can be assessed with an LVIA. We recommend that one is undertaken as part of the SEA. If this is not feasible, then an explicit requirement for a LVIA to be undertaken as part of any development application should be included in the policies of the Neighbourhood Plan.

The assessment of Policies BCS2-BCS5 requires more detail on how visual landscape impacts and biodiversity impacts will be avoided, then mitigated. Paragraph 8.8 states "*At Bosley's Orchard (BCS2), the policy avoids a negative biodiversity effect by requiring land is used to deliver a biodiversity gain in the wide landscape buffer adjoining the Style Acre footpath*". Style Acre footpath is located along the eastern edge of the site. The AONB is along the northern edge of the site. This buffer will not mitigate the visual impacts to the AONB and may block the views of the AONB from the surrounding homes. As an assessment of the visual impacts have not been provided no conclusions can be made. Also, while this landscape buffer may provide a some increase in biodiversity to offset the clearing of the rest of the site there is no specific policy requiring a biodiversity 'net gain' for development within the parish so again no conclusions can be made.

Paragraph 8.10 covers details of how heritage impacts will be mitigated but not how biodiversity impacts will be dealt with. The inclusion of a policy that requires any development to provide a biodiversity 'net gain' within the parish would satisfy this requirement.

For clarification of any points in this letter, please contact Kirsty Macpherson on 07775543864. If you would like to arrange a meeting to discuss your neighbourhood plan or other environmental planning for your community I would be happy to attend.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Kirsty Macpherson
Lead Adviser
Sustainable Development
Thames Team

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

Natural Environment Information Sources

The [Magic](http://magic.defra.gov.uk/)³ 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 [here](#)⁴.

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)⁵. 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](#)⁶.

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](http://magic.defra.gov.uk/)⁷ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁸, which contains more information about obtaining soil data.

Natural Environment Issues to Consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁹ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)¹⁰ 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.

³ <http://magic.defra.gov.uk/>

⁴ <http://www.nbn-nfbr.org.uk/nfbr.php>

⁵ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁶ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁷ <http://magic.defra.gov.uk/>

⁸ <http://www.landis.org.uk/index.cfm>

⁹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁰ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

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.

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](#)¹¹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹². 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 and habitat

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹³) or protected species. To help you do this, Natural England has produced advice [here](#)¹⁴ to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances

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 our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹⁵.

Green Infrastructure, Improving Your Natural Environment.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of green infrastructure (GI). If you are setting out policies on new development or proposing sites for

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁴ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹⁵ <http://publications.naturalengland.org.uk/publication/35012>

development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces.
- Restoring a neglected hedgerow or create new ones.
- 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 encourage wildlife.
- Adding a green roof to new buildings.

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 for the Aylesbury Vale District) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁶).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, 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).

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions.

¹⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

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Architecture
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The Parish Clerk
Parish Office
The Village Hall
West End
Brightwell Cum Sotwell
OX10 0RY

10 Lindsey Street
London
EC1A 9HP
020 7653 1200

10 January 2017

Dear Sir/Madam

Representations to the Pre Submission Draft Brightwell-Cum-Sotwell Neighbourhood Plan (November 2016).

PRP has been instructed by IPE Orchestra Land to submit representations to the Brightwell-Cum-Sotwell Pre Submission Draft Neighbourhood Plan. IPE Orchestra Land has an interest in the land which is referred to as Sotwell Manor Fruit Farm (BcSS 11a) within the Neighbourhood Plan site assessments report.

These representations object specifically to the proposed allocations for residential development under Policies BCS3 '*Land at Little Martins Home Farm Barnes*', BCS4 '*Land at Thornes Nursery*', and BCS5 a, b, c '*Slade End Green*'. The representations will also address the suitability of Sotwell Manor Fruit Farm for a residential allocation within the Neighbourhood Plan.

Soundness of the Neighbourhood Plan

Neighbourhood Plans must meet a number of basic conditions, as set out below, in order to comply with legislation (paragraph 8 (1) (a) of schedule 4B to the Town and Country Planning Act) as tested by an Independent Examiner;

- Is the plan consistent with National Planning Policy?
- Is the Plan consistent with Local Planning Policy?
- Does the Plan promote the principles of sustainable development?
- Has the process of making the plan met the requirements of the European environmental standards?

It is considered that the current Draft Neighbourhood Plan has a number of unresolved issues which affect the listed policies and the soundness of the Plan.

Policy BCS3: Land at Little Martins & Home Farm Barns

Land at Little Martins has been allocated for 30 dwellings accessed via Waterman's Lane to the south of the site.

My client questions the proposed site access from Didcot Road onto Watermans Lane and the allocation for 30 dwellings on this site as identified within the policy. The access is described within the sites assessment (BcSS 03a) as- *'the entrance to the site, from a sharp corner of the Didcot Road, would be visible and adversely affect the views, albeit only from a very small section of the Conservation Area'*.

The supporting text for Policy BCS3 highlights that Watermans Lane is a popular rural walk for the village and that the access design should preserve the rural character avoiding street lighting.

My client is concerned with the provision of the access point to this site on a 'sharp corner' with limited visibility in either direction. It is also noted that the entrance to the site is visible from the conservation area and that views out of this part of the Conservation Area would be adversely affected.

Further to the above comments, the sustainability appraisal and specifically the scoring matrix for this site (p24) should be reconsidered to take account of the implications of development on heritage, roads and rural character.

Policy BSC4: Land at Thornes Nursery

Land at Thornes Nursery has been allocated for 4 dwellings and an extension for the village hall car park. The site is accessed from Old Nursery Lane.

My client objects to this site being allocated for residential development on the grounds of access, underdevelopment and impact on the conservation area. The restricted access along Old Nurseries Lane limits the proposed allocation to 4 dwellings. However the policy also proposes part of the site to be laid out as an extension to the village hall car park, and is therefore contrary to the access issues that form reasons for refusal in previous applications for this site.

An Appeal for residential development on this site was dismissed in November 2001 (ref APP/Q3115/A/01/106/98/48) with specific mention to the vehicular access not being wide enough to allow vehicles travelling in opposite directions to pass, whilst still maintaining a safe route for pedestrians.

The whole site falls within the conservation area. The inspector in the above appeal was not satisfied that the alterations needed to provide access to the highway network within the village could be carried out without having a harmful effect on the rural environment or the character or appearance of the conservation area.

South Oxfordshire's Core Strategy (2012) sets out a minimum density of 25 dwellings per hectare unless this would have an adverse effect on the character of the area (Policy

CSH2). The development of 4 dwellings on this site (1.1ha) is therefore considered to be an inefficient use of land.

Further to the above comments the sustainability appraisal and specifically the scoring matrix for this site (p24) should be reconsidered to take account of the implications of development on heritage, roads and housing mix.

Policy BCS5a, b, c - Slade End Green

These sites are envisioned by the Neighbourhood Plan to come forward under one masterplan, although they are in three separate land ownerships;

BCS5A: Slade End Farm - dwellings (number of dwellings not indicated) and business use

BCS5B: Stranges Nursery - 6 dwellings

BCS5C: Slade End South to West of Green Lane - 1 dwelling

The Plan acknowledges that these sites may take some time to come forward but no specific reason is given as to why this is. Legal agreements and land equalization are referenced and could be potential reasons for delay.

Planning Practice Guidance advises on assessing sites and states 'Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development.' (Reference ID: 3-022-20140306).

The intention of Policy BCS5 is to bring these three sites forward together under one masterplan. However the assessment of the sites does not identify how and when the fragmented landownership will be dealt with and this has an impact on the availability of these site coming forward together.

Site A falls within the Conservation area whilst site B and C lie adjacent. As identified within the site assessment, site B highlights that 'there have been several planning applications made since at least 1982 for housing which were refused for reasons including, in an appeal of 2003, impact on the conservation area'. With regards to site C, a planning application was made for one bungalow in 2013 which was refused at appeal for reasons including impact on the character and appearance of the area, in addition to the setting of the adjacent Conservation Area.

Further to the above comments, the sustainability appraisal and specifically the scoring matrix for this site (p24) should be reconsidered to take account of the implications of development on heritage and rural character.

Sotwell Manor Fruit Farm BcSS 11a

Sotwell Manor Fruit farm extends to 3.3 hectares (8.1 acres) and is currently part occupied by a garden nursery used for growing soft fruit available for 'pick your own' and ready picked sales. The nursery is accessed from High Road (A1430) to the north. The site is located outside but adjacent to the settlement boundary of Brightwell-cum-Sotwell. There are no physical constraints on site but the North Wessex Downs AONB surrounds the village.

The Site also benefits from bus stops along High Road and is within close proximity to Wallingford and the town of Didcot. Didcot Parkway railway station is 4.5 miles from the site and Cholsey railway station is also within 4 miles of the site.

The following comments are raised in relation to the site assessment;

Rural Character - The site is well contained and therefore the secluded setting would reduce the impact of development on the rural character of the village. It can be demonstrated that access from the A4130 would not be a significant constraint on proposed development nor would the proposed access have a detrimental impact upon the rural character of the area. Highways advice has been taken and this has highlighted access is not an issue.

Landscape Setting - It is considered that the landscape has moderate capacity to absorb further residential development and proposals will be carefully designed so that they do not effect the setting of the AONB. The site is visually well contained; there are limited views to the site from the surrounding landscape and publically accessible land. Wallingford is separated by development to the east and therefore this site does not infill the gap or cause coalescence between Wallingford and the village.

Land Use - The PYO fruit farm will be retained and development will be located on the southern portion of the site together with a pedestrian/cycle route connecting to Five Acres public footpath.

Conservation Area - The site falls outside of the conservation area and is not close to any listed buildings.

Core Facilities - As well as access from the A4130 the site can also be accessed via a public footpath (known as Five Acres) that runs along the north-western boundary of the site linking to Sotwell Street. The site is therefore within close proximity to services and facilities within the village; Brightwell Primary School, Post Office and The Village Stores - 1.4km. The Red Lion - 1.km and St James Church - 0.6km. Local bus stops are located 350m east and 700m west of the site. In comparison to the draft allocations at Slade End Green this site is located closer to the listed village facilities.

Community Profile - As discussed there would not be a loss of local business or PYO facility

The Promotion Site

Sotwell Manor Fruit Farm represents a more suitable site than those proposed to be allocated under policy BCS3, BCS4 and BSC5a, b, c of the emerging Neighbourhood Plan.

It is evident from the above that there is a strong case for allocating land at Sotwell Manor Fruit Farm for residential development. The site is not only suitable but also available and achievable as follows;

Suitability

- The site is immediately adjacent to the defined settlement policy boundary for Brightwell Cum Sotwell
- The site occupies a sustainable location and is well located to benefit from a number of community facilities and services within walking distance. These local services include a village store, post office, pub, church and primary school.
- The site to the south of the PYO fruit farm can accommodate the total number of dwellings currently allocated in policy BCS 3,4 and 5a,b and c
- The site's access is located off the A4130. This will therefore alleviate potential new development traffic running through the centre of Brightwell. There are no overriding constraints to prevent the site coming forward

Availability

- The site is within one land ownership and IPE Orchestra Land are promoting the site for residential development.

Achievability

- There are no technical constraints to preventing this from coming forward for residential development immediately, and if allocated IPE Orchestra Land are keen to progress its proposals for the site in full consultation with the Parish Council and community
- Land at Sotwell Manor Fruit Farm should therefore be included in the Neighbourhood Plan as a housing allocation, instead of existing proposals within the Draft Plan.

Conclusion

The Pre-Submission Neighbourhood Plan has failed to promote the principles of Sustainable Development, as explained in these representations, in allocating the following sites for residential development;

BCS3 - 30 dwellings

The site is accessed from a sharp corner on Didcot road and is therefore a reason for concern with regards to pedestrian and vehicular access.

BCS4 - 4 dwellings

Residential development on this site has previously been dismissed at appeal and the reasons given for vehicular access and impact on the conservation area still exist.

BCS5a, b and c - 7 dwellings (excluding BCS5A)

The Plan does not identify when and how these separate sites will come forward under one masterplan as intended.

It is recommended that the Parish Council:

- 1) Extend the Village Boundary, indicated on the Pre-Submission policies map inset A, to include this site.
- 2) Include Sotwell Manor Fruit Farm as a residential allocation to meet the proposed housing need for Brightwell-Cum-Sotwell. This site is available and deliverable and represents the most sustainable option for development.

We trust that our client's representations will be addressed as the Neighbourhood Plan progresses and we request that we are kept updated of further iterations.

Yours Sincerely



Jonathan Greenberg
Planner

Representation from SODC

Planning services
HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading

Lucy Dalby
By email only:
bcsparishcouncil@googlemail.com

Contact officer: Ricardo Rios
Ricardo.rios@southandvale.gov.uk
Tel: 01235 422600

Cc: Jason Debney
jjrdebney@gmail.com

Textphone users add 18001 before you dial

11 January 2017

Dear Ms Dalby

Brightwell-cum-Sotwell Neighbourhood Development Plan - Pre-Submission Consultation

Thank you for taking the time to meet with me in person to discuss the progress and aspirations of your draft Neighbourhood Development Plan (NDP) in person and for giving the Council the opportunity to comment on your NDP.

Having now seen a complete draft, along with some of the evidence, we are able to offer formal advice compiled from across the Council, under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy 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 about whether the draft plan meets the basic conditions.

	Section/Policy	Comment	Recommendation
1	<p>Foreword – Paragraph 5 and 8</p> <p><u>Paragraph 5</u> The parish retains many facilities such as a pub, a shop (with a post office), a school, the village pub, village hall, a riverside hotel, several garages and an award winning vineyard...</p> <p><u>Paragraph 8</u> To meet the parish’s housing needs and to guide sustainable development, it was agreed in 2013 at the Brightwell cum Sotwell Parish Meeting to develop a Neighbourhood Plan. The Parish Council established a sub-group to consult on and produce a neighbourhood plan with the intention that following referendum the Brightwell cum Sotwell Neighbourhood Plan will form part of South Oxfordshire District Council’s local plan to guide development within our parish.</p>	<p><u>Paragraph 5</u> This section lists pub twice.</p> <p><u>Paragraph 8</u> The South Oxfordshire District Council’s local plan is one of a series of documents which alongside neighbourhood plans form part of the Development Plan for the District.</p>	<p><u>Paragraph 5</u> If the intention is to refer to two pubs, this should be clarified.</p> <p><u>Paragraph 8</u> Amend section to: To meet the parish’s housing needs and to guide sustainable development, it was agreed in 2013 at the Brightwell cum Sotwell Parish Meeting to develop a Neighbourhood Plan. The Parish Council established a sub-group to consult on and produce a neighbourhood plan with the intention that following referendum the Brightwell cum Sotwell Neighbourhood Plan will form part of South Oxfordshire’s Development Plan and will guide development within our parish.</p>
2	<p>Vision – Page 5 and Paragraph 5.1</p> <p>The Vision for Brightwell is: <i>“To retain our separate identity as a rural parish set within open countryside, conserving the character of the various settlements; in a way that allows the community to evolve whilst sustaining our core vital services”</i></p>	<p>It is important to take every opportunity to demonstrate/express that the NDP has looked at the neighbourhood area as a whole.</p>	<p>Amend section to: 5.1 The Vision for Brightwell-cum-Sotwell is: <i>“To retain our separate identity as a rural parish set within open countryside, conserving the character of the various settlements; in a way that allows the community to evolve whilst sustaining our core vital services”</i></p>
3	<p>Paragraph 1.2</p> <p>The purpose of the Brightwell cum Sotwell Parish</p>	<p>It is important that neighbourhood plans use positive language to</p>	<p>Amend section to: The purpose of the Brightwell cum Sotwell Parish Neighbourhood Plan</p>

	Neighbourhood Plan (BPNP) is to make planning policies that can be used to determine planning applications in the area in the period to March 2032. Its policies aim to positively plan for the growth of the main village but to do in ways that will protect the special character of the Parish.	ensure that changes which could improve and enhance the neighbourhood plan area are not discouraged.	(BPNP) is to make planning policies that can be used to determine planning applications in the area in the period to March 2032. Its policies aim to positively plan for the growth of the main village but to do in ways that will protect and enhance the special character of the Parish.
4	Paragraph 1.7 These requirements will be tested by an independent examiner once the Neighbourhood Plan is finalised. If satisfied, the examiner will recommend that the plan goes to referendum of the local electorate. If a simple majority of the turnout votes for the Plan, then it becomes adopted as formal planning policy for the area.	It is important to make clear that the independent examiner's report is not legally binding on the Council and that currently NDPs do not automatically become a statutory document following the referendum.	Amend section to: These requirements will be tested by an independent examiner once the Neighbourhood Plan is finalised. If satisfied, the examiner will recommend that South Oxfordshire District Council should progress the plan to a referendum of the local electorate. If the Council decides to progress the plan to a referendum, and a simple majority of the turnout votes in favour the Plan, the Council must adopt it as formal planning policy for the area, so long as the plan doesn't breach EU Regulations.
5	Paragraph 3.2 The National Planning Policy Framework (NPPF) published by the government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The BPNP must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the BPNP: <ul style="list-style-type: none"> Supporting a prosperous rural economy (paragraph 28) 	It is important that readers are made aware that the plan is consistent with the NPPF as a whole.	Amend section to: 3.2 The National Planning Policy Framework (NPPF) published by the government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The BPNP must demonstrate that it is consistent with the provisions of the NPPF as a whole. The following paragraphs of the NPPF are especially relevant to the issues addressed by the BPNP: <ul style="list-style-type: none"> Supporting a prosperous rural economy (paragraph 28) Good Design (paragraph 58) Protecting healthy communities (paragraph 70)

	<ul style="list-style-type: none"> • Good Design (paragraph 58) • Protecting healthy communities (paragraph 70) • Protecting local green spaces (paragraph 76) • Conserving and enhancing the natural environment (paragraph 109) • Conserving and enhancing the historic environment (paragraph 126) • Neighbourhood planning (paragraph 185) 		<ul style="list-style-type: none"> • Protecting local green spaces (paragraph 76) • Conserving and enhancing the natural environment (paragraph 109) • Conserving and enhancing the historic environment (paragraph 126) • Neighbourhood planning (paragraph 185)
6	<p>Paragraph 3.5 The essence of the overall planning strategy for the District has been and will continue to be to focus development on the main towns and larger villages of the District and to maintain the rural character of the open countryside that makes up the majority of the area. The Parish does not lie within an area planned for growth and is currently considered a ‘smaller village’.</p>	<p>It is important that we take any opportunity to show that the NDP views appropriate development in a positive light. The NPPF support for prosperous rural communities envisages a level of growth, the local policy context indicates that this level of growth should be limited or lesser than the levels expected for larger villages and towns.</p>	<p>Amend section to: 3.5 The essence of the overall planning strategy for the District has been and will continue to be to focus development on the main towns and larger villages of the District and to maintain the rural character of the open countryside that makes up the majority of the area. The Parish does not lie within an area planned for significant growth and is currently considered a ‘smaller village’.</p>
7	<p>Paragraph 3.8 More generally, the housing supply strategy of the Core Strategy is deemed out of date by §49 of the NPPF, given the District Council cannot demonstrate it has a five year supply of housing land, and this is unlikely to change until the new Local Plan is adopted. The new strategy proposes a significant increase in the pace and scale of housing</p>	<p>It is necessary to add the word “currently” to make the description of the District’s housing land supply position factually accurate.</p>	<p>Amend section to: More generally, the housing supply strategy of the Core Strategy is currently deemed out of date by §49 of the NPPF, given the District Council cannot demonstrate it has a five year supply of housing land, and this is unlikely to change until the new Local Plan is adopted. The new strategy proposes a significant increase in the pace and scale of housing development over the period to 2032.</p>

	development over the period to 2032.		
8	<p>Paragraph 3.9</p> <p>The indication is that based on its range of local services and population, the village will be likely to require the BPNP to plan for at least 50 new homes over the plan period. The Core Strategy requires the mix of housing types on schemes to reflect local circumstances, which is expected to remain a requirement as this is consistent with the NPPF.</p>	<p>Please ensure there is a robust evidence base behind the number you have arrived at.</p> <p>Even though this to the minimum number of houses to be built, it may come under severe scrutiny, because of your intention to establish a settlement boundary.</p>	<p>You should have an audit trail of where this minimum number has come from, development plan plus the evidence base of the emerging Local Plan i.e. SHMAA 2014.</p> <p>The following extract from your Site Assessment Report provides a good summary of the situation: <i>“Although the Neighbourhood Plan is very likely to be examined and made before the adoption of the new Local Plan, and it will therefore be tested against the strategic provisions of the existing development plan, it can still refer to the evidence of reasoning of emerging strategic policy. In this case, the indication is that the village may need to plan for approximately 50 – 60 homes over the plan period to 2032”</i></p>
9	<p>Paragraph 3.12</p> <p>Although these policies now repeat national policy guidance (and so are therefore unlikely to be included in the new Local Plan in these forms), they reinforce the importance of proposals having full regard to heritage assets, whether formally designated or not. The Parish generally, and the village specifically, contains a significant number of listed buildings, as well as two Conservation Areas.</p> <p>These heritage assets will very much shape the site selection and other policies of the BPNP. The BPNP may also define the special character of the local</p>	<p>NDPs can direct developers to supplementary planning guidance, in effect raising awareness of guidance tackling specific issues. This however, does not change the status of individual documents.</p>	<p>Paragraph 3.12</p> <p>Although these policies now repeat national policy guidance (and so are therefore unlikely to be included in the new Local Plan in these forms), they reinforce the importance of proposals having full regard to heritage assets, whether formally designated or not. The Parish generally, and the village specifically, contains a significant number of listed buildings, as well as two Conservation Areas.</p> <p>These heritage assets will very much shape the site selection and other policies of the BPNP. The BPNP may also help define the special character of the local Conservation Areas and guide developers to existing supplementary guidance.</p>

	Conservation Areas and raise the status of current supplementary guidance to carry the full weight of the development plan.		
10	Paragraph 4.4	There is a missing “The” at the start of the sentence.	
11	<p>Policy BCS1: A Spatial Plan for the Parish <i>The Neighbourhood Plan defines the Brightwell cum Sotwell Village Boundary, as shown on the Policies Map. Proposals for infill development within the boundary will be considered, provided they accord with the design and development management policies of the development plan and other policies of the Neighbourhood Plan. Proposals for development outside the boundary, including within the settlement of Mackney, will only be supported if they are consistent with local development plan policies on local landscape protection and the protection of the natural environment.</i></p>	<p>The Sustainability Appraisal referred to the Judicial Review ruling in relation to the Tattenhall Neighbourhood Plan in May 2014 highlighting the role of community engagement in setting a framework for “deciding the reasonable alternative options for the policies in the Neighbourhood Development Plan and informing the decisions taken on what the draft policies would contain.</p> <p>The Council welcomes the fact that Brightwell-cum Sotwell Parish Council requested that the Sustainability Appraisal looked at the technical attributes of identified options to enable a comparison.</p> <p>The preferred option defines a settlement boundary, generally welcoming development within and restricting development outside the identified boundary. New housing development is distributed across a range of small sites</p>	<p>Please review and amend this policy and supporting text to address the weaknesses highlighted by the judgment of Patterson J in R (Stonegate Homes) v Horsham DC, 13th October 2016 and the general conformity issue highlighted by the Council.</p> <p>Please review and amend the Preferred Sites Assessment Report to address the concerns raised by the Council. Further guidance on improving the robustness of your site assessment document can be found here</p>

		<p>around the periphery of the village following a number of principles.</p> <p>The identified alternative options (A, B, C and D) mainly differ from the preferred option insofar as it focuses growth on a particular direction, i.e. South, East, West etc. However, it is not clear whether these alternative options also include a settlement boundary.</p> <p>One clear gap in the assessment is the consideration of the preferred distribution strategy without the settlement boundary as a reasonable alternative. It is also important that assumption about the predicted impacts or benefits of alternatives are backed by evidence.</p> <p>Whilst it is clear that consideration has been given to housing provision within the settlement boundary throughout the plan period, it is not clear what consideration was given to whether other forms of development (i.e. employment, community facilities, etc) could be accommodated within the boundary.</p> <p>The judgment of Patterson J in R</p>	
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		<p>(Stonegate Homes) v Horsham DC, 13th October 2016 is very pertinent to this issue and highlights the issues outlined above. You can find a copy of the decision here.</p> <p>It is also important to note that there are no policies setting settlement development limits within the development plan for the District. Attempting to do so, would result in a less flexible and more restrictive approach to development at the neighbourhood level. This fundamental conflict with the Development Plan's strategic policies could cause this policy to fail to meet basic conditions.</p> <p><u>Preferred sites assessment</u></p> <p>It is clear that consideration has been given to the availability (although not always clear how this has been established), constraints and potential impact of the assessed sites. However we have not been able to identify how the capacity and viability, which are also key determinants of the suitability and deliverability of these sites, have been assessed, i.e. BcSS03a</p>	
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		<p>and BcSS08 are both setting densities well below 25 dwellings per hectare, with the former also requiring mitigation measures.</p> <p>This document is likely to come under a lot of scrutiny. It is important that it is able to demonstrate that the sites have been assessed fairly. Using terms such as “the site sits outside the settlement boundary” or “it is located within the Green Heart” to explain why the site is unacceptable may be counterproductive. This is because it may give the impression that sites have been selected or excluded solely on the bases of whether they fit within the NDP preferred strategy, without regard to how the sites fare against other criteria.</p>	
12	Policy BCS1 explanatory text	Please see comment 8	Please see recommendation 8
13	<p>Site Allocation Policies</p> <ul style="list-style-type: none"> • Policy BCS2: Land at Bosley’s Orchard • Policy BCS3: Land at Little Martins & Home Farm Barns • Policy BCS4: Land at Thorne’s Nursery • Policy BCS5: Slade End Green • <i>BCS5A: Slade End Farm</i> 	<p>General Comments</p> <p><u>Site specific requirements</u></p> <p>Please ensure your evidence base demonstrate how land owners and developers have been appropriately engaged throughout the development of site specific requirements. The sites identified in the plan should not be</p>	<p>Please review and amend the site allocation policies to address the concerns raised by the Council.</p> <p>* Identifying areas where outline applications are inappropriate is an untested approach for NDPs. The Council can state that outline applications will not be accepted in certain constrained areas but the justification must be clear and stated in advance of applications being submitted, i.e a number of</p>

	<ul style="list-style-type: none"> • <i>BCS5B: Strange's Nursery</i> 	<p>subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p> <p>Demonstrating that land owners/developers are supportive of the NDP site specific requirements allows you to evidence that the plan provides for sustainable development which benefits the local community without placing unrealistic pressures on the cost and deliverability of that development.</p> <p>Finally, housing allocations would be better expressed as approximately, rather than up to, unless there is specific justification for doing so.</p> <p><u>Landscape/Wildlife buffer</u></p> <p>The site allocations require large landscape buffers. This have often been deemed overly prescriptive by examiners. It is important that you present robust evidence that such buffers are needed, since they reduce the developable area of the site and may conflict with Local and National policies requiring efficient use of land.</p>	<p>Councils do not accept outline applications within Conservation Areas.</p> <p>Whilst we cannot guarantee that you would be able to successfully implement such requirement, it would be worth exploring the possibility setting a requirement that planning applications for allocations within the Conservation Area should be submitted as full applications only.</p>
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		<p>Development Management Officer Comments</p> <p><u>Potential conflict with Oxfordshire County Council Highways</u></p> <p>There is a number of site allocations for 5 or more dwellings (BCS2 – up to 20 dwellings; BCS3 – approximately 30 dwellings; BCS5 – approximately 6 dwellings; BCS5B – approximately 6 dwellings) with the following requirement:</p> <p><i>There is no street lighting, the road layout being designed in a way that follows the traditional ‘lane’ type found elsewhere in the village without pavements, providing eclectic verge side boundary treatments and varying road widths to minimise the impression of an ‘estate build’.</i></p> <p>Such requirement, particularly for allocations of 5 or more dwellings could cause problems with OCC highways.</p> <p><u>Affordable Housing Policy CSH3 (Affordable housing) from the Core Strategy requires 40% affordable housing on all sites where there is a net gain of three or more dwellings, subject to the</u></p>	
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		<p>viability of provision on each site.</p> <p>Some of the site allocations do not make reference to providing affordable housing – others do.</p> <p>It is not clear whether there should be no affordable units on some of the allocated sites or whether such requirement has been excluded due to viability issues.</p> <p>Any affordable housing requirements introduced for site allocations on the NDP need to refer to viability. You can achieve this easily by using wording such as “subject to the viability of provision on each site”.</p> <p>Conservation Officer Comments</p> <p>BCS3: Land at Little Martins and Home Farm Barns</p> <p>A high amount of site and surroundings assessment would be required for this site to be deliverable. Whilst the brief in the policy states that proposals will need to have full regard to sustaining the character of the village and semi-rural entrance, the existing limitations for possible highways upgrading are notable constraints along with existing trees on the site</p>	
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		<p>and views from the north-west. Assessment of all these should inform proposals, even at outline stage.</p> <p>BCS4: Thorne's Nursery As above but more constrained by limits to access between listed buildings, increased visibility from within the conservation area and contribution made by significant trees which may require retention. Suggest that part of the policy for this site should state that outline applications would not be appropriate here owing to high level of constraints which should inform proposals. Perhaps policy could include requirement for Full Applications only* in order to ensure full assessment of site is made in advance of the application being submitted to ensure due regard to all constraints is given and informs proposals – also applications should enter into pre-application discussion with the council.</p> <p>BCS5: Slade End Green As above, proposals should be submitted as full applications only* – not eligible for outline permission – owing to the high level of</p>	
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		<p>constraints and necessary informed assessment to be certain the site(s) are deliverable.</p> <p>Agree that a holistic approach to this area of BcS would be a good approach but unclear as to how the policies could realistically achieve this as land ownership is mixed.</p>	
14	<p>Landscape policy Paragraph 5 – page 28</p> <p>In the 2014 the BCS CLPP identified that the overwhelming perception by the community was that Brightwell cum Sotwell is a rural parish and should strive to remain so. 98% of respondents indicated that the rural character of the parish is important. The CLPP identified that the number one concern of local residents was a perceived loss of rural character and the prospect of the main settlement being joined to Wallingford at Slade End. As Wallingford continues to expand westwards there is only one field separating the village from the town. Another important gap between settlements was identified between the main village and Mackney. In both cases working farmland provides an appropriate 'rural' buffer between settlements.</p>	<p>The NDP will have difficulty in setting buffers or development exclusion zones (please see comment 15). However, you may be able to achieve your objective by identifying areas that perform the valuable function of preventing the coalescence of distinct settlements.</p>	<p>In the 2014 the BCS CLPP identified that the overwhelming perception by the community was that Brightwell cum Sotwell is a rural parish and should strive to remain so. 98% of respondents indicated that the rural character of the parish is important. The CLPP identified that the number one concern of local residents was a perceived loss of rural character and the prospect of the main settlement being joined to Wallingford at Slade End. As Wallingford continues to expand westwards there is only one field separating the village from the town. Another important gap between settlements was identified between the main village and Mackney. In both cases working farmland performs a valued function, preventing the coalescence of distinct settlements.</p>

<p>15</p>	<p>Policy BCS6: Landscape Character <i>The Neighbourhood Plan defines the following Local Gaps on the Policies Map for the purpose of preventing the coalescence of the two settlements:</i></p> <ul style="list-style-type: none"> <i>i. Brightwell cum Sotwell - Mackney Local Gap; and</i> <i>ii. The Slade End Local Gap.</i> <p><i>Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its function and open character.</i></p> <p><i>Development proposals either within the Village Boundary or in the open countryside that will obstruct or harm the character of a long view between the village and open countryside including those views through a gap in the existing streetscene will be resisted.</i></p>	<p>Policies that seek to introduce blanket restrictions to rural areas, and which go beyond normal countryside policies, are unlikely to meet basic conditions.</p> <p><u>Local Gaps</u> The examiner of the Sonning Common neighbourhood plan deleted a similar policy. Please see Policy DS1 on page 16 of the <u>Examiner’s Report</u></p> <p>Such approach is normally viewed as overly onerous as it does not allow for special circumstances and does not recognise the kind of development that would not necessarily be inappropriate development.</p> <p><u>Views</u> It is important that locally important public views are identified on a map (please also see section on views in comment and recommendation 17). As worded the policy seeks to place a blanket restriction on any development that obstructs or harm any long distance view. Similar to the issues raised with the local gaps policy, this approach may excessively restrict and inadvertently</p>	<p>You can reword your policy in a positive way, highlighting the role and function of “open countryside” in protecting the separate identity of individual settlements and their valuable contribution to the character of the area.</p> <p>The information contained within your evidence base may allow you to identify important characteristics of the area/areas that help define the separate identity of the settlements.</p> <p>Example from a made NDP The parcel of land identified as Area D on the Potterton Associates Landscape Appraisal Map, “Ruscombe Valley”, is an area that also performs the important role of separating Whiteshill & Ruscombe and the rest of Stroud. In this location the following uses are considered to enhance the area without compromising its important role and function:</p> <ul style="list-style-type: none"> a) sustainable farming enterprises, b) recreation, c) essential community facilities
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		prohibit sustainable development.	
16	<p>Policy BC7: The Green Heart of the Village <i>The Neighbourhood Plan designates a Green Heart formed by a connected sequence of open spaces within and adjoining the village, as shown on the Policies Map.</i> <i>Development proposals on land that lies within the Green Heart will be required to:</i></p> <ul style="list-style-type: none"> i. <i>demonstrate how they enhance the visual characteristics and biodiversity of the land; and</i> ii. <i>ensure their landscape schemes, layouts, access and public open space provision and other amenity requirements contribute to the maintenance an improvement of the Network.</i> 	<p>This policy appears to seek the protection of a network of open spaces within and adjoining the village. Policies that seek to introduce blanket restrictions are unlikely to meet basic conditions. In the recent past (see comment 15 example) examiners have deleted similar policies citing an irreconcilable conflict between the objectives of this policy, i.e requiring development to:</p> <ul style="list-style-type: none"> i. <i>demonstrate how they enhance the visual characteristics and biodiversity of the land; and</i> ii. <i>ensure their landscape schemes, layouts, access and public open space provision and other amenity requirements contribute to the maintenance an improvement of the Network.</i> <p>And the very nature of development, which tends to be urbanising.</p>	<p>If the intention of the policy is to protect valuable green spaces, it would be more appropriate for you to pursue a local green space designations (LGSD).</p> <p>A LGSD would offer the highest level of protection an NDP could put in place. Further information on LGSD can be found on link, Paragraph 77 on page 18.</p> <p>If you feel the sites you have identified do not meet the requirements set by national policy, you might still be able to have a positively worded policy that highlights the special value of identified sites individually and as a network.</p>
17	Policy BCS8: Design Principles	<u>Important views – criterion i</u>	Add the Brightwell-cum-Sotwell Conservation Area Character

<p>i. They do not obstruct or otherwise harm an important view, as shown on the Policies Map</p> <p>ii. They do not include street lighting</p> <p>iii. They retain the dark visual ambiance of the village via minimal external illumination</p> <p>iv. They have regard to historic plot boundaries, hedgerows and enclosure walls</p> <p>v. Proposals for new garages, outbuildings or tall garden walls must be subservient in scale and, whether of a traditional or modern design, should draw from the local palette of vernacular building materials</p> <p>vi. The impacts on residential amenity of the construction arrangements are minimized by way of lorry movement, deliveries, working times, lighting and loss of vegetation</p> <p>vii. They do not include installing pavements or kerbs to existing village lanes;</p> <p>viii. Proposed parking arrangements should seek innovative solutions that do not necessitate large expanses of driveway</p>	<p>This policy references important views shown on the policies map, however they appear to be missing. We were unable to identify these views or how they were defined. The Council's Conservation officer expressed a general support for NDPs identifying important views but highlighted that the plan must be clear on what makes these views significant.</p> <p>Please also see comment 15 on views.</p> <p><u>Criterion vi and Xi</u> Both criteria raise laudable objectives. The planning system can require a construction management plan which addresses some, though not necessarily all of the matters raised in criterion vi. On top of not covering all the issues raised in criterion vi, the planning system has little influence over the provision of broadband. You should consider whether the NDP would be raising unrealistic expectations within the community.</p>	<p>Appraisal and Management Plan to the Appendix A Evidence Base to ensure developers also refer to them.</p> <p>Please review and amend policy criteria to address the concerns raised by the Council.</p> <p>The Green Horizons Document supporting the recently made Whiteshill & Ruscombe NDP (link) provides an example of how the important views identified in the Landscape and Green Spaces Study could be presented in the NDP.</p>
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	<p><i>nor the loss of vegetation along the highway but do not necessitate parking on village lanes</i></p> <p>ix. <i>The layout, orientation and massing of new houses on larger residential schemes must avoid an estate-style appearance by dividing the developable area into distinct parcels and by responding to the historic grain of the development in the village, including its road and footpath network and historic property boundaries</i></p> <p>x. <i>Shared surfaces are encouraged</i></p> <p>xi. <i>All new dwellings should be designed with access to superfast broadband infrastructure to enable home working</i></p> <p>xii. <i>They must use permeable surfaces on driveways and use sustainable drainage systems that can connect directly to an existing or new wet environment wherever possible</i></p> <p>xiii. <i>They will not require the culverting of existing ditches</i></p>		
18	<p>Policy BCS13: Horticulture Proposals for horticultural</p>	<p>Agriculture, which includes horticulture, is the default use of land;</p>	<p>Amend policy wording to: Policy BCS13: Horticulture Proposals for small scale market</p>

	<p>development will be supported, provided they:</p> <ul style="list-style-type: none"> i. Provide employment; ii. Do not harm the rural character; iii. Comprise only small scale market gardens or orchards; iv. Do not include the use of industrial scale greenhouses, poly tunnels; and v. will not cause harmful noise or light pollution. 	<p>therefore using the land for such purpose does not require planning permission.</p> <p>As regards to physical alterations or the erection of buildings, agricultural land, particularly larger units, benefit from extensive permitted development rights.</p> <p>It appears that the policy is trying to positively encourage small scale market gardens or orchards, which have an element of retail (A1 land use class in planning terms). If this is the case, the policy needs to be redrafted to clarify what type of development the policy is managing i.e. agricultural or retail.</p> <p>When reviewing this policy please bear in mind that paragraph 28 of the NPPF supports the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings. If the policy is considered more restrictive than the NPPF at examination there is a risk it could be deleted.</p>	<p>gardens or orchards will be supported. These development proposals should:</p> <ul style="list-style-type: none"> i. Provide employment; ii. Avoid significant harm to the rural character of the area; iii. not cause significant noise or light pollution
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19	<p>Policy BCS14: Solar Energy Proposals for a solar energy array will be supported in principle, provided:</p> <ul style="list-style-type: none"> i. it is not located in the AONB or in a designated landscape of the local Plan; ii. it is not affect the character of the setting to the AONB and in any event they are located and designed to suit the character of the local landscape; iii. it is effectively screened; iv. it will not cause harmful noise or light pollution; and v. it comprise a gross site area of no more than 1 Ha 	<p>As worded the policy is overly restrictive. It in effect places a blanket restriction, in principle, on solar energy development within a particular location (criterion i) or over a certain size (criterion v).</p> <p>Whilst national policy affords great weight to conserving landscape and scenic beauty in AONBs, it does not preclude appropriate development.</p> <p>It is important to note that the Core Strategy (Policy CSQ1) allows renewable energy proposals provided any adverse impact on the landscape, heritage and biodiversity of an area, traffic generation or the amenities of local communities is outweighed by wider environmental, social, economic or other benefits.</p>	<p>Amend policy wording to: Policy BCS14: Solar Energy Proposals for a solar energy array will be supported, provided:</p> <ul style="list-style-type: none"> i. they are located and designed to suit the character of the local landscape; ii. it is effectively screened; iii. it will not cause significant harmful noise or light pollution; and
20	<p>Monitoring & Review Policy The BPNP will be monitored by the District Council and the Parish Council using data collected in planning monitoring reports. The objectives will form the core of the monitoring activity but other data collected and reported at a scale relevant to the Plan may also be included. It is expected that the BPNP will be formally</p>	<p>This section is not clear on what aspects will be monitored or who will monitor them.</p> <p>It is reasonable to expect the District Council to monitor the strategic elements of your adopted plan, such as housing numbers, employment land, retail provision and other aspects that have been</p>	<p>Please review and clarify this section according to your priorities and sustainability/environmental commitments.</p>

<p>reviewed on a five-year cycle or to coincide with the review of the development plan.</p>	<p>delegated to the neighbourhood level.</p> <p>However, where the plan has very local specific policies, the monitoring of these is required to be done by the parish council undertaking the Neighbourhood Development Plan in accordance with the SEA Regulations.</p> <p>This process will enable you to see whether your adopted plan policies are working and whether they are achieving the main plan objectives for the future. This review of plan policy implementation provides the opportunity to decide if your Neighbourhood Development Plan requires a review.</p> <p>It also enables you to check whether the affects you predicted as part of your SEA or SA are in line with expectations and whether mitigation measures are having the desired effect, thus ensuring the protection of the environment, as the SEA Regulations intend.</p> <p>Monitoring is usually done on an annual basis, but this is dependent on</p>	
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		the indicator that you are monitoring.	
21	Landscape and Green Spaces study	There is a lot of very detailed information within this document. It is clear that a lot of time has been spent in gathering data and it is very pleasing and informative to read.	Overall it could be improved with a little more critical analysis to accompany the description and could be better integrated with the neighbourhood plan, thus making your NDP add detail and aid the interpretation of strategic policies. For example, you could use it to demonstrate why development on certain sites should come forward to a certain design or orientation if it helps to preserve or enhance a particular view identified in the evidence.