

# CUDDESDON AND DENTON NEIGHBOURHOOD DEVELOPMENT PLAN

## CONSULTATION STATEMENT

November 2019



*Cuddesdon: originally an Anglo-Saxon hilltop settlement and still surrounded by open countryside with exceptional far-reaching views*

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# 1 Introduction

## Legal obligations

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012, Section 15(2). Part 5 of the Regulations sets out what a Consultation Statement should contain:
- details of the persons and bodies who were consulted about the proposed Neighbourhood Plan;
  - how they were consulted;
  - the main issues and concerns raised by the persons consulted;
  - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

## Summary of consultation process

- 1.2 The proposal to prepare a Neighbourhood Development Plan for Cuddesdon and Denton was first made and endorsed at a packed meeting of the Parish Council in May 2017. It was formally agreed by the Parish Council at the following meeting in June 2017 and a Neighbourhood Plan Committee was set up.
- 1.3 Since then the Committee has organised three consultations:
- 20 February 2018 on the Village Character Assessment;
  - 22 July 2018 on the Vision and aims for the plan;
  - A six week pre-submission consultation from 2 September 2019 –25 October 2019 including an open evening in the village hall on 18 October 2019.
- 1.4 In addition the Committee consulted South Oxfordshire District Council on the draft plan before the pre-submission consultation.

## Aims of consultation process

- 1.5 The aims of the process were:
- To involve as many residents as possible in the development of the plan so it was informed by the views of local people and other stakeholders;
  - To ensure that consultation events took place at critical points in the process where decisions needed to be taken.
- 1.6 A report was given to the Parish Council after each event.

## 2 The consultations

### February 2018 consultation on village character assessment

- 2.1 One of the first actions of the Committee was to commission an independent Village Character Assessment. The purpose of the first consultation was to share the consultant's findings with residents and to gather their comments before finalising the assessment.
- 2.2 The consultation event took the form of an open evening in the village hall run as a 'drop in' event. It was advertised in the parish newsletter and by means of signs on roads entering the village.
- 2.3 Displays in the hall described the neighbourhood planning process. Summaries of the seventeen character areas identified by the Consultant were set out on tables around the room. There were also sheets on each table to gather comments sorted by character area. Members of the Committee were on hand to explain the process and answer questions.
- 2.4 About 50 comments were made. The comment sheets were scanned and sent to the consultant to be considered in the final draft of the assessment. They are attached at Appendix A.

### July 2018 consultation on visions and aims of plan

- 2.5 The design of this consultation event was the same as the first. The proposed vision and aims for the plan were set out on tables together with comment sheets.
- 2.6 Over 170 individual comments were made. These were summarised in a report attached at Appendix B.

### Consultation with SODC on draft plan before pre-submission consultation

- 2.7 The draft plan was shared with SODC in preparation for the pre-submission consultation. A meeting and email exchanges led to a number of changes to the plan. A summary of the SODC comments is attached at Appendix C.

### Consultation on pre-submission draft

- 2.8 The consultation on the pre-submission draft plan ran for just over six weeks from 2 September to 25 October 2019 and included another drop-in evening in the village hall.
- 2.9 Residents were informed of the consultation as follows:
  - by means of an insert in the September parish newsletter which was delivered to every house in the parish, as well as an article by the Chairman of the Parish Council and a formal public notice in the newsletter;

- posting copies of the public notice at the village hall and on the village notice board;
  - including a reminder in the October newsletter;
  - roadside signs to remind residents of the drop-in evening.
- 2.10 An article was posted on the front page of the parish website with a link to the plan and supporting documentation, as well as a link to an on-line survey form. Hard copies of the plan were placed in the church porch, college office and the pub.
- 2.11 The September insert alerted residents to the consultation; described the process and summarised the plan. It gave details of where the plan could be read on or off line and included a paper survey form in the same format as the on-line survey.
- 2.12 There is one major landowner which is not based in the parish, Magdalen College. An email was sent informing the college of the consultation which the college forwarded to its land agents, Savilles.
- 2.13 Emails were also sent to the village pub, the Bat and Ball, and to Ripon College, Cuddesdon as the two major employers in the parish.
- 2.14 Emails were also sent to a list of statutory consultees as follows:
- Oxfordshire County Council
  - South Oxfordshire District Council
  - Elisabeth Gillespie, District Councillor
  - Tim Bearder, County Councillor
  - Stadhampton Parish Council
  - Little Milton Parish Council
  - Great Milton Parish Council
  - Horspath Parish Council
  - Garsington Parish Council
  - Wheatley Parish Council
  - Natural England
  - Environment Agency
  - Historic England
  - BT
  - Oxfordshire Clinical Commissioning Group
  - NHS England
  - Scottish and Southern Energy Power
  - Thames Water - Developer Services and Planning Policy
- 2.15 The following statutory consultees were not consulted because the policies in the plan had no relevance to their operations:
- Homes England

Network Rail  
Highways England  
Marine Management  
EE  
Three  
EMF  
The Coal Authority  
Wood plc  
National Grid  
Cadent  
UK Power Network

2.16 A combined total of 30 on-line and paper survey forms were completed. The paper returns were entered on-line to make it easy to summarise them.

2.17 Email responses were received from:

Oxfordshire County Council  
South Oxfordshire District Council  
Historic England  
Scottish and Southern Electricity Networks  
Savills for Thames Water Planning Policy  
Natural England

The summary of the on-line and paper surveys is attached at Appendix D; SODC's response at Appendix E; OCC at Appendix F and the others are combined into Appendix G.

### 3 Consultation comments and responses

#### February 2018 consultation on village character assessment

- 3.1 Scanned copies of the comment sheets on the village character assessment were sent to the consultant. Some of the comments were corrections. A large number expressed the importance of the views around the village, the open fields and established trees. There were concerns about the state of the roads; the slow redevelopment of Dove House farm; the removal of hedges on farmland and the threat to wildlife. These were considered by the consultant and incorporated in the assessment as appropriate.
- 3.2 As a result of the consultation, the report was strengthened to consider the views in more detail; more information was included on the built environment and a reference to the undesirable nature of cul-de-sacs was modified.

#### July 2018 consultation on visions and aims of plan

- 3.3 The hand-written comments were summarised into a report.

- 3.4 There was general support for the vision and aims. In response, a reference to facilities for young people was added. The policy on flood risk was removed since it duplicated the Local Plan policy without adding anything extra. Other comments were reflected subsequently in the drafting of the policies.

#### Consultation with SODC on draft plan before pre-submission consultation

- 3.5 SODC made a large number of detailed and technical comments on the plan. The majority were accepted and led to a much improved document.
- 3.6 The main policy change was to drop the reference to the provision of rural exception housing on the Dove House Farm site. Rural exception housing is no longer an exception if it is specified in the Plan. In fact the Local Plan provides the necessary policies if needed.
- 3.7 In addition a policy on Local Gaps was included and the formatting of the Statements was changed so that they did not look the same as the Policies.

#### Consultation on pre-submission draft

- 3.8 A combined total of 30 on-line and paper survey forms were completed. The paper returns were entered on-line to make it easy to summarise them.
- 3.9 In response to residents, a reference was added to the need for high speed broadband in Denton and Chippinghurst. The allotments were added to the proposed list of Local Green Spaces
- 3.10 In response to Natural England, more specific targets for biodiversity gain were included. In response to the County Council, the aspiration to a Pick Me Up bus service to Oxford was dropped.
- 3.11 A number of technical changes were made in response to SODC as set out in Appendix E.
- 3.12 Some of the responses from statutory consultees seemed to take the form of standard replies which contained suggestions more relevant to a Local Plan than to a Neighbourhood Plan. They were not included on the basis that they would be covered in the Local Plan as appropriate to South Oxfordshire. As a general rule, policies have only been included where the Neighbourhood Plan can provide a finer grain to augment the Local Plan.

## Appendix A – Comments on Character Assessment

Scanned copies of the handwritten sheets are include on the next few pages.



Village Character Assessment – Character Area:

CENTRAL PART CUDDESDON

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
THE GREEN	Views from front of house to the church & across the green	1) Preservation of verges - many cars park on grassed areas by pavements	A very special place - worthy of careful nurture & preservation.
		2) State of road down to the Mill. 3) Possibility of Expressway in Thame Valley	Any new houses to be built and planned to maintain the character of the village.
High St.	The views	That further building will be out of character	To get rid of overhead wires would make for a better environment! They're a mess.
HIGH STREET	MIX OF HOUSING AND PRESENCE OF ESTABLISHED TREES	OVERDEVELOPMENT OF CERTAIN PROPERTIES AND REMOVAL OF VERGES. PARKING/DRIVING ON PAVEMENTS	WHERE IS MANOR HOUSE? IT IS MANOR FARM!
The Green	Views from front of house across green to wonderful church	Some recent plantings (corker tree) not very attractive	Wires are eyesore and vulnerable if windy.
The Green	The superb views in all directions	Condition of road to mill	This is not <sup>style</sup> ribbon development (see 1.3).

Village Character Assessment – Character Area:

ALLS AINT'S CAURLIT

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Thurston			Cross Street wnt has been used Cyclists no Cyclists Born is an understatement: 14C Tythe born
Brockside	Being able to see the Church from a long way off. Especially when the sun catches it or the flood lights are on at night.		
The Green	Church tower & clock are lovely.	Too long getting the redevelopment finished in Dovehouse Farm.	→ Get on with it!

**Village Character Assessment – Character Area:**

RIPON COLLEGE

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Field Lane / Wheatley Road	Long established trees		16 <sup>th</sup> Century cottages.
Brookside	Chapel in Ripon College old building.	Needs to be protected	Nature of established trees.

Village Character Assessment – Character Area:

# COOMBE Woods

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Wheatley Rd			Improve Paths
The Green	I Love Muntjac deer and fabulous bluebells in wood	I think the woodland could be slightly better managed →	
Parkside	"	The wood is private but used as a tip by some	Disagree — don't improve paths. Keep it quiet.
Parkside	Bluebells, wildlife	Cars parking along verge Fly tipping	

Village Character Assessment – Character Area:

EAST FARM LAND SWEEP

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Brookside	Open fields, view to the River Valley	Too many fox sets in the farmland.	Need Protection
Brookside	English bucolic countryside	protection of Green fields farming & wildlife	We need to make provision for preservation.
The Lane	Open space wide vistas Good for walkers	Increased field size and removal of hedges	Needs protection
High St	The views - especially down to the valley	Hedge rows are not encouraged - small fields are combined to make large ones.	Footpaths should be kept usable and hedge-rows reinstated
Parkside	The views	Fields getting larger Removal of Hedges / trees Poor public footpath signage	Same as above comments

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
The Green	Great views <del>are</del> from road especially when driving home		
Parkside	The views; the walks.	Often the foot paths are impossible. The hedges are narrowing.	Banley is also green but lavender <del>not</del> would grow well too.

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Village Character Assessment – Character Area:

CUDDESTON BROOK

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Ten Lane	Wildlife and wild character		Accessibility + enjoyment much improved if a footpath crossing at or near the stepping stones
Parkside	Its potential for peace	Lacks of wildlife - few ducks etc.	Brook v. high in winter; river needs management
High St.	The peace of the Brook; knowing that deer + other mammals frequent are	An expressway would kill the whole area	
The Green	The river is a peaceful place to walk. When it floods it provides good views from village	↑ I agree with this.	Near Chippinghurst Manor The issue of where the footpath crosses must be resolved.

Village Character Assessment – Character Area: CHISELHAMPTON HILL

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Parkside	Narrow lanes	That the lanes might be widened	
The Green	The superb views	Hopefully someone will <u>not</u> decide to fence the area (e.g. Dorchester Meadows!).	



**Village Character Assessment – Character Area:**

CHIPPINGS HURST PASTURE

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Whalley Road			Improve stepping stones and access to stepping stones
15 All Howe		1.4 Ripon College <u>Cuddesdon</u> is the name	

**Village Character Assessment – Character Area:**

FARMLAND WEST OF DENBOW  
CANE

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
HIGH STREET	OPEN COUNTRYSIDE AND DECENT ROAD HEDGES	USE OF AGRICULTURAL LAND AS "GARDEN" AT THE PLATT	

### Village Character Assessment – Character Area:

# CENTRAL FARM LAND

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
2. The Green	Wildlife, peace, open views	Hedgerows are becoming smaller displacing badgers + deer.	
THE GREEN	A favourite walking route.	Loss of hedgerows + trees.	
THE GREEN	The excellent views, improved by the occasional flooding! Wildlife	Loss of views + wildlife.	

Village Character Assessment – Character Area:

MANOR HOUSE

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
The Green	The red lites live here and we enjoy their presence,	<del>The owner of the lake</del> We remember some dispute concerning planting round the lake	The lake should be surrounded by willows, shrubs, etc.

Village Character Assessment – Character Area: **WEST DENTON FARM LAND**

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
<del>BRICKSIDE</del> DENTON	WALKS		
Brick side	WALKS + countryside. Beautiful long distance views from north of Upperfield farm Peace + quiet.	Wildlife needs protecting	This area needs protecting.
DENTON GREEN	ONE OF THE BEST VIEWS AND WALKS IS FROM THE TRACH FROM DENTON TO THE GARSINGTON	STATE OF ROADS	
FIELD COTTAGE.	NATURAL BEAUTY + WILDLIFE.	THE STATE OF THE LAND TO THE PROPERTY, REQUIRES URGENT REPAIR	KEEP AS IS, PROTECT THE AREA.
			Does this bring out the reused chapel windows mentioned by Persner?

**Village Character Assessment – Character Area:**

DENTON

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
DENTON GREEN			AGREE WITH LIS

Village Character Assessment – Character Area:

NORTHERN FARM LAND

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Outside	open views; peace		→ other crops might be good.

Village Character Assessment – Character Area:

HILLSIDE FARM LAND

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
Brookside.	Amazing views of beautiful English countryside	loss of this natural beauty	
Parkside			The area also has two loved allotments
Bishopwood	Historic, period houses with fine details		Historic character to be retained & well run



Village Character Assessment – Character Area:

GENERAL

What street do you live on?	What do you like about this area?	What concerns do you have?	What comments would you like to make about this area?
High St.	The Views are Spectacular.	development would spoil the views.	
"	The Quiet is something special too,	"	
Parkside	The fence; the dark skies; the kites, buzzards & badgers.	Development: A road; of buildings.	

## Appendix B - Summary report of consultation on plan vision and aims

Aim	Summary of comments
<p><b>Vision</b></p> <p>“Our vision is to maintain Cuddesdon and Denton as a unique and desirable place to live for people at all stages of their lives. We want to conserve the village as a visually attractive and peaceful place in which to live, study, work or to visit. At the same time, we want to respond positively, within our capacity, to the national need for sustainable development.”</p>	<p>General agreement to the vision and recognition that some development is necessary, provided the infrastructure is developed to match.</p> <p>Could think of facilities such as shop and post office.</p> <p>One respondent suggested including the word ‘safe’.</p> <p>Suggestion that vision should think more of teenagers and young people who will want more than “visually attractive and peaceful”.</p>
<p><b>Aim 1 Maintaining the character of the village</b></p> <p>The plan will include a basic aim to maintain the atmosphere and sense of community of the village and to conserve its historic and rural character.</p> <p>What aspect of the village character is most important to you?</p>	<p>All agreed with this aim.</p> <p>Respondents valued the peaceful rural atmosphere, the views, safe environment for children and sense of community.</p>
<p><b>Aim 2 Conserving local landscape and environment</b></p> <p>The plan will also include an aim to conserve the local landscape and environment and to minimise the impact of development on the surrounding countryside, landscape, views and ecosystems.</p>	<p>All agreed – some strongly - ‘vital’, ‘very important’ ‘definitely’ and ‘absolutely’.</p> <p>Two replies recognised the need to work with landowners – mainly farmers – to manage hedge rows; to plant new hedges and trees.</p>

Aim	Summary of comments
<p>Are our views so important that they should be a separate aim?</p>	<p>No one commented specifically on making the preservation of views a separate aim though views were considered important.</p>
<p><b>Aim 3 Support housing within the capacity of the village (eg constrained by traffic, parking, utilities, facilities)</b></p> <p>Cuddesdon and Denton is considered an 'other' village by the District Council of planning purposes. Because we have no shop, school, surgery, or bus service, it has decided not to ask us to find sites for new houses.</p> <p>In fact the current proposals for Dovehouse Farm will result in 9 new houses.</p> <p>Because of the Green Belt, any new housing has to be within the village so the plan could support infilling.</p> <p>It could also support 'rural exception' housing – affordable houses built on land in the Green Belt to provide homes for people with connections to the community in perpetuity.</p> <p>Do you think we should have any more houses? Any affordable houses? Do you have family who would like to live in the village but can't afford to?</p>	<p>All the respondents thought this should be in the plan although one respondent thought there was no scope for new houses.</p> <p>A few reacted to the comment about lack of facilities calling for a shop, bus or the PickMeUp minibuses.</p> <p>The majority thought that Dovehouse Farm should include affordable housing for those with a connection to the village.</p> <p>One respondent added the caveat that the infrastructure should be improved to keep up.</p>

Aim	Summary of comments
<p><b>Aim 4 Wanting to influence the housing mix if development does takes place (Provision for young families and older people)</b></p> <p>The plan could argue the case that any development that does take place should prioritise housing which is suitable for families with young children and older people wishing to downsize but to stay in the village.</p> <p>Do you have any particular concerns over the type of any new housing?</p>	<p>General support for the idea of affordable housing for those with village connections, families and older people in keeping with ‘local vernacular’, to high sustainability standards and with off-street parking.</p> <p>One respondent asked “what was the point of new housing without a decent bus service”.</p>
<p><b>Aim 5 Avoiding flood risk</b></p> <p>Avoiding flood risk is a standard planning policy. The plan could make reference to specific risks if desired.</p>	<p>Most people said yes except for one who said there had been no house flooding.</p> <p>Someone else pointed out the flash flooding in Denton. As a result of this experience, there were a number of comments about the need for good maintenance of drains and culverts.</p>
<p><b>Aim 6 Increasing connectivity within the village</b></p> <p>Communities work best when people bump into each other in their daily lives. The plan could include a policy that any new developments be properly integrated into the network of village streets and paths so that, in planning speak, they are ‘permeable’ rather than isolated.</p>	<p>Strong support for this with concern that the Dovehouse development will be an isolated collection of houses unconnected to the village.</p> <p>Others noted the importance of the pub, church and village hall as meeting points plus the recreation ground for children.</p>

Aim	Summary of comments
<p><b>Aim 7 Travel and parking</b></p> <p>The plan can't demand a better bus service or improve parking in the High Street.</p> <p>It can set a policy that all new developments have at least two off-road parking spaces.</p> <p>It could include a statement encouraging the return of a bus service to Wheatley.</p> <p>It could also include a statement asking to make the chicanes in Horspath safer for cyclists to encourage more people to cycle into Oxford rather than using a car.</p> <p>Do you have any transport concerns?</p> <p>Would you use a bus service to Wheatley?</p> <p>Do you cycle to Oxford? If so do you have any concerns over the Horspath chicanes?</p>	<p>General support for a requirement for off street car parking provision.</p> <p>Suggestion of a hub and spoke bus service to Wheatley.</p> <p>Concerns about speed of cars through the village, particular for cyclists.</p> <p>Two respondents suggested a cycle path through Horspath. One later said she no longer cycled through Horspath because of the speed of cars on the hill, where the road narrows; another because of the chicanes.</p>
<p><b>Aim 8 Maintaining green spaces (the recreation ground, Cuddesdon and Denton Greens, College Field)</b></p> <p>The Plan could recognise the importance of the green spaces in the village – the recreation ground, Cuddesdon and Denton Greens and College Field. It could set a policy to prevent building on these areas.</p> <p>Do you agree?</p>	<p>General agreement that this is important although one respondent commented that College Field - owned by the College – is different in kind from the recreation ground and the two greens.</p>

Aim	Summary of comments
<p><b>Aim 9 Maintaining local gaps (ie open space between Cuddesdon and Denton, as well as Chippinghurst)</b></p> <p>The plan could recognise the importance of what are called ‘local gaps’ ie open countryside between settlements, such as between Cuddesdon, Denton and Chippinghurst. At present these are protected by the Green Belt rules. The plan could reinforce this with policies to maintain the gaps should the Green Belt rules ever be relaxed.</p> <p>Do you agree?</p>	<p>General agreement to prevent ribbon development and maintain the integrity of the sub-communities.</p>
<p><b>Aim 10 Supporting community facilities (Church, pub, recreation ground and village hall)</b></p> <p>The planning system normally doesn’t have much influence over existing buildings and facilities. But, our neighbourhood plan could include a statement on the importance of the community facilities and a policy that would support developments to maintain them at the heart of our community.</p> <p>Do you agree?</p>	<p>General agreement eg “without community facilities the village dies!”</p> <p>Need to think about facilities for young people.</p>
<p><b>Aim 11 Maintaining the night sky</b></p> <p>Street lighting is pretty minimal in all of Cuddesdon, Denton and Chippinghurst. It is part of the character of</p>	<p>Again strong support both to see night skies and to maintain the rural character of the village.</p>

Aim	Summary of comments
<p>our rural community and means that we can enjoy looking at the stars on a clear night.</p> <p>The plan could include a policy to minimise the level of street lighting associated with new developments.</p> <p>Do you agree?</p>	<p>One person also suggested that security lights should be set up to avoid their being triggered by passing pedestrians.</p>
<p>What else?</p> <p>Is there anything else which isn't included which you think should be?</p>	<p>One respondent suggested farmers and farms need support and access to their fields and buildings.</p> <p>Four people commented on road issues: The dangers of failing to cut verges on our narrow single lane roads; the need to maintain roads and footpaths and to deal with surface water and pot-holes.</p>

## Appendix C – SODC comments on First Draft with Cuddesdon and Denton Response

Firstly we would like to commend you for producing a high quality first draft. We can see that you have put a lot of work into the document and it shows in the quality of the work. We have tried to provide detailed comments so that you can continue to work on the document.

As we have set out in the email, the settlement of Cuddesdon has been shown incorrectly as an 'other village' in Appendix 7 Settlement Hierarchy in the emerging Final Publication Version 2nd Local Plan 2011-2034, published in January 2019. This is an editing error as it should be shown as a 'smaller village', with its position not changing from the current Core Strategy hierarchy. The Settlement Assessment Background Paper, which is what the Settlement Hierarchy is based on, shows Cuddesdon as a 'smaller village'.

We will be proposing that this is changed in the emerging Final Publication Version 2nd Local Plan 2011-2034 through the modification schedule at the end of March. We suggest that moving forward you refer to Cuddesdon as a 'smaller village', in line with the existing Core Strategy and Settlement Assessment Background Paper.

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
General	You make reference to a 'confidential survey conducted by ORCC (now Community First Oxfordshire)' – have you conducted any surveys/questionnaires as part of the neighbourhood planning process? This confidential survey is from 2010, so the information collected is now out of date and a more recent survey would be more appropriate.		
Page 6 – 1. Introduction to Neighbourhood Development Plans – The Planning Process – Paragraph 1.1 – 1.2	The first section of the introduction could be re-worded to summarise the planning process better. Currently the focus is on residential development, however there are many other forms of development that require planning permission. We suggest you keep in mind when planning permission is required as set out in the Town and Country Planning Act 1990. Wording such as:	Ok	



Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p><i>‘When development is being carried out that requires planning permission, this permission needs to be obtained from the relevant local planning authority. To help a local planning authority decide whether or not to give planning permission, the local planning authority will assess the proposal against the policies set out in its development plan.</i></p> <p><i>In our case, the majority of planning applications will be determined by South Oxfordshire District Council. Currently, they are in the process of producing a new Local Plan for the period 2011-2034. The emerging Local Plan sets out the identified need and location for housing and employment, and supporting infrastructure, up to 2034.’</i></p> <p><i>The emerging Local Plan is highly supportive of neighbourhood planning. Objective 6.1 is to ‘champion neighbourhood planning, empowering local communities to direct development within their area and provide support to ensure Neighbourhood Development Plans are deliverable, achievable and sustainable’.</i></p>		
Page 6 – Neighbourhood Planning – Paragraph 1.3	Instead of ‘have to comply with higher level plans’, we suggest you be more specific in setting out the requirements for a neighbourhood plan. We suggest wording such as:	Ok	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p><i>‘Neighbourhood Development Plans have to meet certain specified ‘basic conditions’. The basic conditions are:</i></p> <ul style="list-style-type: none"> <li><i>a. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.</i></li> <li><i>b. The making of the neighbourhood plan contributes to the achievement of sustainable development.</i></li> <li><i>c. The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></li> <li><i>d. The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.</i></li> <li><i>e. Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.</i></li> </ul> <p>You then need to replace ‘become part of the Local Plan’, with <i>‘become part of the Development Plan’</i>.</p> <p>We suggest you replace ‘legal force’ with <i>‘legal status’</i>.</p>		
Page 7 – Figure 2 – map of	Please source the map.	Done	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Cuddesdon and Denton			
Page 8 – Status – Paragraph 1.10	Instead of saying ‘adoption until the end of South Oxfordshire’s Local Plan period – 2033’, you should say ‘the Plan will run <i>for a 15 year period from 2019 to 2034</i> ’.	Ok	
Page 8 – Physical Description – Paragraph 2.2	Delete ‘in fact’.	Ok	
Page 9 – Physical Description – Paragraph 2.6	Insert ‘ <i>Area of Outstanding Natural Beauty</i> ’, after North Wessex Downs.	Ok plus Chilterns	
Page 9 – Population – Paragraph 2.7	<p>Rather than saying the ‘current’ population, we suggest you say:</p> <p><i>‘The population of the parish in <b>XX</b> was 494 people’.</i></p> <p>The population figure you provide in your plan will only be a snapshot in time, as the population in Cuddesdon and Denton could change over the plan period, you need to make sure you include a date and source for data like this.</p>	Ok	
Page 10 – The Church of England – Paragraph 3.4	Where are the two ecclesiastical quotations? Are they in the previous section?	Yes	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Page 12 – 15 – 4 Character Assessment	The character assessment flicks between talking about Cuddesdon, Denton and Chippinghurst. To improve the assessment and to make it clear when you are talking about each of the settlements above it might be worth having sub-section on each of the settlements.	Done	
Page 12 – 4 Character Assessment – Paragraph 4.2	We suggest you make reference to the most up to date version of the emerging Local Plan – Second Publication Version Local Plan 2034, published in January 2019 for consultation.	Ok	
Page 12 – 4 Character Assessment – Paragraph 4.4	Change ‘There are’ to ‘ <i>There have been</i> ’.	Ok	
Page 12 – 4 Character Assessment – Paragraph 4.5	This paragraph seems slightly out of context. Section 106 agreements are made between local authorities and developers which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. It is not clear how this relates to the character assessment and would therefore recommend it is removed from this section.	Seems relevant as this is a section on planning status and it is mentioned in other local plans	Agreed no change
Page 12 – 4 Character Assessment – Paragraph 4.5	It is not necessary to say ‘formal’ before Conservation Areas.	Changed to ‘designated’	Accepted by SODC

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Page 12 – 4 Character Assessment – Paragraph 4.7	<p>The first sentence is repeating the figure already set out in paragraph 2.7 of the plan. The plan should avoid repetition where possible, so we question the necessity of paragraph 207?</p> <p>We suggest ‘essentially’ is replaced with ‘fairly’.</p>	Modified	
Page 13 – 4 Character Assessment – Paragraph 4.12	What new construction are you referring to here?	Modified to clarify	
Page 13 – 4 Character Assessment – Paragraph 4.17	<p>Delete ‘And’ at the start of the second sentence so that it reads ‘<i>The connection with the landscape is....</i>’</p> <p>What are ‘informal footpaths’?</p>	<p>Changed to ‘In addition’</p> <p>Footpaths used by the village over many years, which are not public nor permissive rights of way</p>	Accepted by SODC
Page 12 – 4 Character Assessment – Paragraph 4.25	Delete the word ‘possibly’.	This is based on the listing entry <a href="https://historicengland.org.uk/listing/the-list/list-entry/1181267">https://historicengland.org.uk/listing/the-list/list-entry/1181267</a>	Accepted by SODC
Page 16 – Figure 3 – Public green spaces in	<p>Please source this map.</p> <p>This map might be better placed alongside the policy it relates to.</p>	Shouldn’t it be close to where it’s first mentioned	Map to be moved with page no when

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Cuddesdon and Denton			first mentioned.
Page 18 – Paragraph 4.34 - 4.37	<p>Neighbourhood plans should be positively written. This section is negative and does not seek to contribute to the aim and objectives of the neighbourhood plan. This section seems to focus on a proposal which has already obtained planning permission.</p> <p>We would recommend that this section is removed from the neighbourhood plan.</p>	Probably the most important planning issue in the village therefore included. Opinions changed to the facts	Revisions accepted by SODC
Page 19 – Heritage Groups – Paragraph 4.38	<p>What do heritage groups achieve beyond listed building protection? The text says, ‘deserves protection from inappropriate development to maintain their character’ – would the listed status of the buildings not achieve this anyway?</p> <p>What do you mean by heritage groups? Do you have any maps showing these groups? Do you have an evidence to support why these groups deserve to be recognised?</p>	The concept of Heritage Groups is taken from the Baldons NDP. They include both listed and non-listed buildings and provide a finer grain of detail than the listing system.	Use Baldons para 3.6.4 and include photos
Page 19/20 – Paragraph 4.39	<p>In light of what we have said above regarding the settlement hierarchy, we recommend that you refer directly to the Settlement Assessment Background Paper which categorises Cuddesdon as a ‘Smaller Village’.</p> <p>Given this is just an editing error we will be proposing to amend the emerging Final Publication Version 2<sup>nd</sup> Local Plan 2011 - 2034 through the</p>	Done	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p>modification schedule at the end of March.</p> <p>We suggest that your text is updated accordingly, in line with the Settlement Assessment Background Paper.</p>		
Page 20 – Transport – Paragraph 4.43	We suggest you rephrase the sentence ‘Because of the need for a car, parking is difficult, particularly in the High Street and on Denton Hill’. It would read better if it said, ‘ <i>The need for a car makes parking difficult, particularly in the High Street and on Denton Hill</i> ’.	Changed to ‘Houses in the High Street and on Denton Hill are close together and many do not have space for off-road parking, making parking in the street difficult.’	
Page 22 – Views and Gaps – Paragraph 4.61	What are informal footpaths? Are you referring to public rights of way?	No. See above	
Page 23 – Table 4 – Description of views from and of Cuddesdon	You have said how you need to include images of the views, this will enhance this section of your plan.	Done	
Page 22 – 24 – Views and Gaps	Paragraph 4.60 talks about maintaining the gaps between the settlement, but no further explanation or images showing the gaps is provided in the plan or supporting documents. If you want to protect the gaps you need to clearly identify them (maps) and provide evidence as to why they are important. It needs to be based on	Done	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p>robust evidence. Whilst we appreciate you have the Character Assessment produced by Lepus this document focuses on the landscape types across the neighbourhood area and not so much the value of the landscape and if this warrants further protection from a policy in your neighbourhood plan.</p> <p>A number of other SODC Neighbourhood Plans have included Local Gaps policies, we suggest you look at them to see how they have presented the information and the evidence collected –Brightwell cum Sotwell, Pyrton and East Hagbourne are some examples.</p>		
Page 24 – Figure 4 – Key views in the plan area	<p>Please source the map.</p> <p>View G looks as if it might be outside of the plan area. The neighbourhood plan will only have influence within the designated plan area, so we would advise that all views are kept within the designated area.</p>	Adjusted	
Page 25 – Key Elements – Paragraph 4.70	<p>In light of what we have said above regarding the settlement hierarchy, we recommend that you refer directly to the Settlement Assessment Background Paper which categorises Cuddesdon as a ‘Smaller Village’.</p> <p>We suggest that your text is updated accordingly, in line with the Settlement Assessment Background Paper.</p>	Done	



Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Page 25 – 26 – Key Elements	In this section you flit between talking about Cuddesdon, Denton and Chippinghurst, which can make it hard to follow at times. It might be worth having sub-sections for each of the settlements, so we are clear when you are talking about Cuddesdon and when you are talking about Chippinghurst.	Don't think it's appropriate for two paragraphs in a summary section	Accepted by SODC
Page 27 – Table 5 – Sustainability objectives	Land use, geology and soils – when you say 'within village boundary', this isn't something you have defined as part of the neighbourhood plan- We suggest 'boundary' is replaced with ' <i>built up area</i> '.	Changed	
Page 28 – 6 Vision, Aims and Objectives – Objective 7	You say 'within village boundary', however on the basis that this isn't something your plan has defined we suggest you say ' <i>built up area</i> ' instead.	Changed	
Page 29 – 6 Vision, Aims and Objectives – Objective 9	In this objective you encourage development that will meet the needs of younger adults and their families at prices they can afford. Have you got the evidence to support this?	From the consultations	Include para to summarise results
Page 30 – 38 – 7 Neighbourhood Plan Policies	Before each policy you set out the aims and objectives that that policy is intended to address. Whilst we appreciate what you are trying to do it is not necessary to set out in full the aims and objectives as you have already set them out in the vision, aims and objectives section, it would be suffice to just say for example, ' <i>This policy is intended to address the village character and landscape character and biodiversity aims, meeting objectives 1, 2, 5, and 6.</i> ' Doing it like this would	Copied from another adopted plan which I've now lost so ok	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p>save a lot of space and avoid unnecessary duplication.</p> <p>Instead of setting out the aims and objectives we suggest you include some introductory text before the policy, providing some rationale, so it is clear why this policy has been included. Some of this text may be able to be drawn from the 'Justification' section you have included after the policy.</p>		
	The lists in your policies should use either '1., 2., 3., 4., 5...' or 'a., b., c., d., e...'. The current system which mimics paragraph numbers could be confusing to the reader.	Ok	
Page 31 – Policy CD1 – General Principles	The title of the policy is very vague. It might be worth renaming it 'General Development Principles'.	This was taken straight from the now adopted Baldons plan but changed	
	Planning policies should be positively worded, we suggest that throughout your plan you focus on 'will be supported' and 'will not be supported'.	Noted	
	We suggest for this policy the wording is amended to read – ' <i>New development proposals will be supported where they have regard to the following general principles:</i> '.	This was taken straight from the now adopted Baldons plan. It is stronger than the suggestion.	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	The list has paragraph numbers, we suggest you use numbers of letters for all your policies that have criteria or points, for example '1., 2., 3., 4., 5...' or 'a., b., c., d., e...'. This is applicable to all your policies	Ok	
	1.1 – Rather than saying 'in the SODC Local Plan', we suggest you say ' <i>SODC adopted development plan</i> '. This will help to futureproof your plan, considering both the current development plan policies and emerging policies in the Local Plan.	Ok	
	<p>1.3 – The key gaps need to be better identified. The Character Assessment in the neighbourhood plan briefly discusses them but no visuals have been provided and asides from being 'important to maintaining the character of the parish', no justification is provided. We have explained above how further evidence and justification is needed on this.</p> <p>If gaps are something you want to include in the neighbourhood plan, you should have them in a separate policy. You will need to re-assess your character assessment to ensure there is the justification available for why the gap is needed and that the extent of it justifiable.</p> <p>From looking at the Landscape Character Assessment produced by Lepus, it seems more descriptive,</p>	Done	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	providing an assessment of the landscape types, rather than the value of the landscape.		
	1.4 – We suggest this includes ‘individual heritage assets’, as well as Heritage Groups.	Done	
	1.5 – Insert ‘ <i>Where appropriate</i> ’, as currently it is overly restrictive.	Taken verbatim from the Baldons plan	Where appropriate agreed – to be included
	1.6 – To better align with the NPF we suggest instead of saying ‘are appropriate to the Green Belt and are consistent with...’, you say ‘ <i>are appropriate to the Green Belt or can demonstrate very special circumstances and are consistent with...</i> ’.	Ok	
	Same as 1.1, rather than saying ‘in the SODC Local Plan’, we suggest you say ‘ <i>SODC adopted development Plan</i> ’.	OK	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Page 31 – Justification text	The text will need updating and expanding to reflect the most recent version of the emerging Local Plan.	Done	
Page 32/33 – Policy CD2 – Design Principles	Delete second ‘of’.	Ok	
	Why have you said ‘in Cuddesdon and Denton’? What about Chippinghurst? Why have you included Denton? As worded it would apply to Cuddesdon and Denton only. If it is an overarching policy wouldn’t it be better if it applied to the whole plan area?	Cuddesdon and Denton is the name of the parish and therefore includes Chippinghurst ie it does apply to the whole plan area	Delete ‘Cuddesdon and Denton’
	The grammar in this list needs checking.		
	2.7 – Parking needs to be delivered in accordance with the adopted parking standards, this may not tally with your requirements for ‘one off-street parking space for each bedroom’. On this basis and to ensure the policy is in general conformity with the development the policy reads <i>‘parking will be delivered in accordance with the Oxfordshire County Council adopted parking standards’</i> .	Taken verbatim from another plan which I can’t now find. Modified to a minimum of two places with the get-out clause left in place.	Check East Hagbourne policy and OCC standards
	2.8 – Insert <i>‘Where possible’</i> , as it would be unreasonable to require it from all scales/types of development. This more closely aligns with the emerging Local Plan policy.	Don’t agree	Leave. May be superseded by emerging local plan.

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	2.9 – What standards for energy efficiency are you referring to? It might be worth more closely aligning the wording of this point with the emerging Local Plan to help futureproof the policy.	Done	
	2.10 – Would this point not already be covered by requiring high quality design?	No. Overheating is not well covered at the moment.	Accepted by SODC
	The final sentence of this policy is negatively worded and not necessary as the points are already covered by the policies (CD1 and CD2). We suggest it is deleted.	Taken from another plan – permitted changed to supported.	Agreed to delete.
Page 33 – Justification text	2. – Text will need expanding and updating/checking to reflect the most up to date version of the emerging Local Plan.	Done	
Page 34 – Policy CD3 - Housing	<p>3.1 - Is it necessary to say that this plan does not allocate any land for housing in the policy? This might be better suited in the supporting text, with an explanation provided as to why no allocations are made.</p> <p>3.2 Replace 'SODC Local Plan' with '<i>SODC adopted development plan</i>'.</p> <p>a. This is the definition of infill development from the emerging Local Plan. 3.2 already says that applications for 'infill and redevelopment',</p>	<p>Yes. It is a conscious policy decision given the capacity of the parish for new development.</p> <p>Done</p> <p>Yes for sense. (The reader doesn't want to be cross-checking with</p>	Agreed to include in text instead.

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p>therefore is it necessary to include this?</p> <p>3.3 – Policy need to be positively worded, this text is better suited as supporting text. It is not for policy to pre-determine whether a proposal is going to be acceptable. Also, referring to the Local Plan policy in the policy could mean there is a risk of the policy becoming out of date quicker.</p> <p>In addition when referring to the Local Plan you need to be clear when you are referring to the emerging Local Plan.</p> <p>3.4 – This point is overly restrictive and not in general conformity with the development plan policies. Policy H10 in the Local Plan is the district's exception sites policy. One of the key tests of this policy is meeting a local need. Therefore, your policy limiting it to 'a single affordable housing scheme' with 'up to five houses', is overly restrictive as it does not have regard to the identified local need.</p> <p>We suggest you consider using similar wording to the development plan policy (Policy H10), focusing on small scale development within or adjoining</p>	<p>another document.)</p> <p>This is a policy decision to steer development away from Denton and Chippinghurst and towards Cuddesdon. 'Permitted' changed to 'supported'</p> <p>Ok</p> <p>This policy is in addition to Policy H10 – focusing on brownfield land as advised by Ricardo.</p>	<p>SODC to suggest alternative wording for policy</p> <p>SODC to confirm</p>

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p>villages, where there is a local needs that cannot be accommodated in any other way, that arrangements ensure it remains available for local people and that the benefits of affordable housing remain in perpetuity, and there are no overriding amenity, environmental, design or highway objections.</p> <p>Lease also consider the emerging Local Plan Policy H10, which is the emerging policy for exception sites.</p> <p>Neighbourhood plan should add a local level of detail to the development plan. Is it necessary to include this point, considering the development plan policy and emerging Local Plan policy (Policy H10)?</p> <p>3.5 – Why is this focused on Dove House Farm? Would it not be better to say <i>‘Developments that includes affordable housing and social housing for rent and meets all relevant requirements set out in other policies in this plan in the SODC development plan will be supported’</i>. This would then cover all development.</p>	Removed. Now covered by SODC Local plan with closure of loophole.	
Page 35 – Justification text	The text relating to the emerging Local Plan needs to refer to the most up to date version and be expanded.	Done	
Page 35 – Policy CD4 –	Change ‘SODC Local Plan’ with <i>‘SODC adopted development plan’</i> .	Done	



Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Community Facilities	4.1 – We suggest that you have a list of community facilities in the supporting text, as opposed to the policy. This will help to futureproof your plan and make it easier to make changes (e.g. add a facility to the list or remove one).	Taken straight from the Baldons plan but ok.	
	Other neighbourhood plans have used their community facilities policies to not only support further development but also add some protection to existing facilities. You could consider using wording such as:  <i>‘Proposals that will result in either the loss of, or significant harm to an identified community facility, will be resisted, unless it can be clearly demonstrated that the operation of the facility, or of another community use of the facility, is no longer economically viable, or that there is an alternative, accessible location within or adjoining the built up area of the village’.</i>	ok	
	4.2 – You specifically pull out facilities for young people in this part of the policy. Has it been identified that this is needed in the area? Where is the evidence to support this?	Yes A survey for the Parish plan	Include comments from consultations
Page 35 – Justification text	Are the church, pub and village hall the only community facilities in the plan area?	Recreation ground added	
Page 36 – Policy CD5 –	The Local Green Spaces policy should be accompanied by a map showing the green spaces. Figure 3 shown earlier in	Discuss	Agreed. To be moved

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
Local Green Spaces	the plan, should be brought forward to sit next to this policy.		
	<p>Paragraph 101 of the NPPF sets out that policies for managing development within a Local Green Space should be consistent with those for Green Belts. As currently phrased the second paragraph is not consistent with Green Belt policy, we suggest to simplify this and ensure it more closely aligns with paragraph 101, the wording is modified as follows:</p> <p><i>‘New development will not be permitted on land designated as Local Green Space except in very special circumstances.’</i></p>	Ok	
Page 36/37 – Justification text	<p>The reference to the NPPF needs updating to refer to the most recent NPPF. We suggest the text is modified to read:</p> <p><i>‘Paragraph 100 of the NPPF sets out the criteria for Local Green Space designations:</i></p> <p><i>“The Local Green Space designation should only be used where green space is:</i></p> <ul style="list-style-type: none"> <li><i>a) In reasonably close proximity to the community it serves;</i></li> <li><i>b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing</i></li> </ul>	Ok	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p><i>field), tranquillity or richness of its wildlife; and</i></p> <p><i>c) Local in character and is not an extensive tract of land.”</i></p> <p>The justification text would be better suited as introductory text.</p>		
Page 37 – Policy CD6 – Local Employment	<p>a. It is overly restrictive and unduly onerous to require development to reduce traffic into and out of the parish. It should be expected to mitigate its own impact, but we are not sure that you can justify requiring a reduction. We therefore suggest this is omitted from the policy.</p>	<p>Taken from Baldons plan. See sustainability analysis plus OCC policies. The aim is to reduce travel by providing local employment not increasing travel by providing employment here for people elsewhere.</p>	<p>SODC to provide sample homeworking policy</p>
	<p>c. Change ‘SODC Local Plan’ with ‘<i>SODC adopted development plan</i>’.</p>	<p>Done</p>	
	<p>e. Is it not the Oxfordshire County Council standards?</p>	<p>Ok</p>	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	6.2 – This text doesn't seem to be targeted at employment development. You have already set out in Policy CD1, point 1.6 that proposals for development outside of the built up area of Cuddesdon will only be supported if they are appropriate to the Green Belt location or can demonstrate very special circumstances. It is therefore not appropriate to include this again in this policy, as employment would be covered by CD1.	Ok	
Page 37 – Justification text	This text focuses on reducing the need to travel for work, is this something which has been identified as an issue in the parish? Do you have any information on the amount/level of people that travel outside the parish for work? Is this feasible unless employment is provided in the area?	Taken from Baldons plan.  See sustainability analysis plus OCC policies. The aim is to reduce travel by providing local employment not increasing travel by providing employment here for people elsewhere.	SODC to provide sample homeworking policy CS as above.
Page 38 – Community Infrastructure Levy (CIL) Priorities	South Oxfordshire have had comments from Examiner's on CIL policies such as this. The wording of your policy is very similar to that used by Benson. The Examiner's Report for the Benson Neighbourhood Plan set out:  <i>'This policy is stating how CIL receipts will be spent. It is not clear whether</i>	Taken verbatim from the adopted Baldons plan.  Converted to a Statement	

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
	<p><i>this is a statement of intent on behalf of the Parish Council or an attempt to commit the District Council spend it's CIL funds. In any case I do not see that it is a policy that can be used to determine a planning application. It is perfectly appropriate for the Parish Council to be indicating, in its neighbourhood plan, the projects it is proposing to support from CIL funds, but that should not be a development plan policy. It can be included within the supporting text or even identified as a Community Aspirations. That the policy be deleted with the wording included either as a Community Aspiration or included within the supporting text'. The link to this can be found <a href="#">here</a>.</i></p> <p>Taking this into account, our recommendation to you is the same as the Examiner's for Benson, that the policy be deleted and the information presented as a community aspiration.</p>		
Page 39 – 15 Neighbourhood Plan Statements	Same as in the policies section, it is not necessary to repeat in full the aims and objectives which relate to the statements.	ok	
Page 39/40 – Statement 1 – Possible Expressway	The points raised are outside the scope of the NDP. You can provide factual information about the possible expressway in discussing the context of the neighbourhood plan area, however it is not appropriate to speculate on process and likely effects, particularly since it is not currently known what mitigation would be put in place.	<p>This statement consists entirely of facts.</p> <p>It is a statement not a policy because it is beyond the competence of an NDP. It's included</p>	All statements to be taken out of the boxes.

Section / Policy	SODC Comments	C&D Response	SODC/C&D meeting 1 May
		<p>because it is a matter of the deepest concern to all residents of the parish.</p> <p>Extra section included at new 4.55</p>	

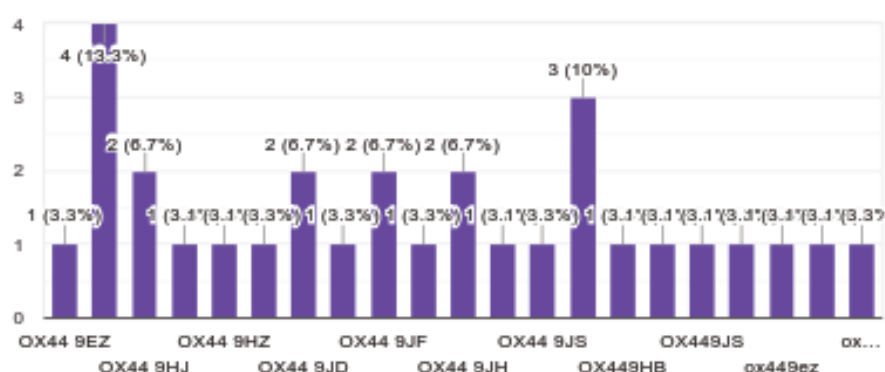
## Appendix D – Summary of On-line and Paper responses to Pre-submission Consultation

### Cuddesdon & Denton Neighbourhood Plan

30 responses

Please could you give us your postcode so that we know whether or not you live in the parish and roughly where

30 responses



### Parish description

The plan begins by describing the parish in some detail. Do you agree with the description?

30 responses



If you want to make a comment on the description, please can you start with the number of the paragraph you wish to comment on and then add your comment

4 responses

in Table 3 on Page 22, section E, 'Denton Lane' should be corrected to 'Denton Hill'

Well written

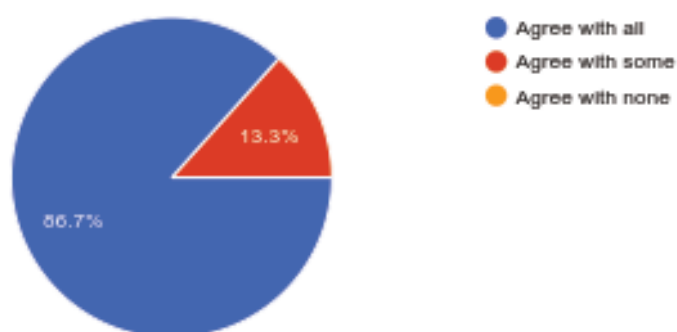
Plan p 61 Please allow the verges to be cut once a year only and use their height as a traffic calmer.

Thanks for all the research to gather such a clear picture

### Proposed policies

The plan includes eight proposed planning policies. Do you agree with them?

30 responses



Policy CD1 – General development principles. Please enter any comments here

2 responses

The separation of Denton and Chippinghurst from development in Cuddesdon is very welcome.

We should support limited housing - very much agree

## Policy CD2 – Design principles - Please enter any comments here

2 responses

The Dovehouse development envisages a footpath with lighting between the new development and the centre of Cuddesdon next to the lane which goes to the mill. This is in contravention of policy b(vi).

Sadly, it was the wish of the community that pedestrian access was not via a footpath through the churchyard, which would have opened up the churchyard to more general use as is the case in most other communities.

Very much agree - maintain a dark sky at night. That is so rare these days

## Policy CD3 – Housing infill developments - Please enter any comments here

4 responses

Conversion of existing barns close to residential housing and with off-road parking shouldn't be prohibited.

We believe that the Dove House Barn development opportunity could be an important enhancement to the village, particularly if a formula could be found to include some social housing. However, even if social housing cannot be included, we believe that a development that meets the principles described elsewhere in The Plan would be a win/win.....more housing and a significantly improved visual approach to the village.

Any housing will need to consider infrastructure - re Thames Water comments

iii) no outward extension of the village vitally important

## Policy CD4 – Residential parking - Please enter any comments here

5 responses



We fully endorse the statements in The Plan.

It would be nice if people who have car parking space within their premises use them

It is important that street parking gets no worse.

Whilst there is congested parking on Denton Hill/ High Street, this does slow the traffic considerably which is a good thing. If parking is increased on the recreation ground, it will just fill up and we will still have the same problem. Ask people with garages to use them for cars, not junk.

Sympathy with residents without parking places. Please discourage parking (by visitors) which puts wheelchair users and pushchairs at risk. Usually OK to park on roadside without encroachment on pavement eg alongside the college.

## Policy CD5 – Community facilities - Please enter any comments here

4 responses

We fully endorse the statements in The Plan.

Should we look at an emergency automated defibrillator placement in the village considering we are a rural village with a significant population of working age people?

I would like to see the allotment sites listed specifically as a community facility

I would like to see more mention of the allotments in the plan since they are an important community facility.

## Policy CD6 – Local Green Gap - Please enter any comments here

3 responses

We fully endorse the statements in The Plan.

Particularly like this concept

Very much agree

## Policy CD7 – Local green spaces - Please enter any comments here

3 responses

We fully endorse the statements in The Plan.

It is very important that the three green spaces in the parish are protected against possible development. Denton Green was designated as a village green in 1972 and so it is protected. The recreation ground and Cuddesdon Green have not been designated as village greens, and they must be so they are also protected from development.

Vital to keep the rec as a whole - no parking - of immense benefit to the young of the village.

## CD8 – Home working - Please enter any comments here

4 responses

Chippinghurst still doesn't have fibre broad band. This makes working from home very frustrating

Improved broadband to Chippinghurst which is one mile from Cuddesdon hub

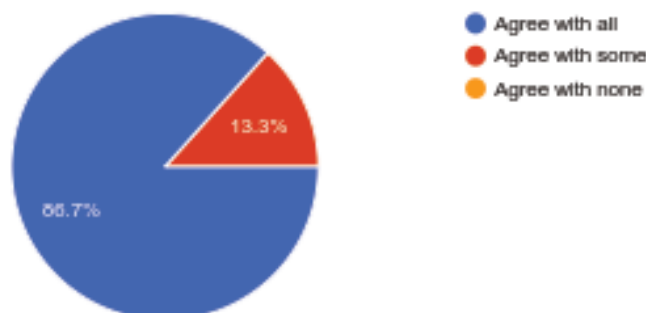
To improve infrastructure, specifically internet connection

To encourage work at home much faster broadband is required in Denton

## Proposed statements

The plan includes five proposed statements. Do You agree with them?

30 responses



## Statement 1 – Possible expressway - Please enter your comments here if you wish

10 responses

No expressway here

In our view this is the most severe threat currently facing our Community, and we commend the efforts of the Action Group.

We are opposed to the expressway spoiling areas of outstanding natural beauty, wildlife habitat, flora and fauna.

This comment is to reinforce our strong support for the Objectives and Statement 1 paragraphs 1.1 to 1.4,

Total waste of money. Sort out the existing roads first.

More emphasis on the possible route over the River Thame. A beautiful river will die underneath a motorway, which is what it is: Expressway is an absurd name.

Absolutely no sense in 2 corridors, or in starting the expressway south of Oxford.

Would be tragic for the village

I think the case against an Expressway can not be over stated for all the reasons mentioned in the document

Very concerned that the expressway would undermine anything this plan could achieve.

## Statement 2 – Sustainable transport - Please enter any comments here

4 responses

The idea of extending the Pick Me Up service seems very constructive.

There needs to be a safe route to Wheatley for both cycling and walking, to gain access to the bus service.

para vi This has been ongoing - The water causes more dangerous potholes and icy roads  
para vii Why are the developers and future developers not responsible for repairs?

A bus to the Thornhill Park and Ride would be useful

### Statement 3 – Landscape character and biodiversity - Please enter any comments here

6 responses

Muntjac deer damage hedgerows and should be culled regularly

Hugely important that this be pursued. Current vandalism on the part of farmers has resulted in further devastation of lengthy stretches of hedgerows and disfigurement of previously handsome trees. This vandalism and lack of concern for wild-life habitat is unforgivable.

Please preserve and do not spoil it!

It would be nice to see less trees and hedges cut down. More trees have been removed in the last year than in the last 60 years.

Denton Brook and surrounds are regarded as important. Environment Agency deals with any sewage pollution immediately.

More emphasis on the benefits of the River Thame for fishing and wildlife.

### Statement 4 – Assets of community value - Please enter any comments here

2 responses

We agree that the pub should be listed as an Asset of Community Value, but recognise the difficulties of making it a viable business.

Essential to get pub a community asset

### Statement 5 – Community infrastructure priorities - Please enter any comments here

3 responses

Allow verges to grow

Does cutting the verges 1) contradict bird nesting good practice? 2) Increase speed of traffic?

Part of any levy could be used to help with continued restoration of more allotment land and provision of

water. Allotments useful facility for many beneficial reasons, also a place where students and village interact with wider benefits for the village.

## Any other comments

Please add any other comments you want to make here:

10 responses

The curse of the pothole. We know it is mentioned elsewhere but we wish to emphasise our view that the state of the road surface through the village is disgraceful.....dangerous, unsightly and makes The Neighbourhood look neglected.

Maybe I missed it, but I think the plan should mention the quietness of the village. The Peace and quiet of the village is part of the character. A great detailed and comprehensive plan.

It would be a shame to ruin such a lovely village with any new housing developments or roads.

Whilst I agree that there is little that can be done about the cars parked at the top of Denton Hill if there is no where else for the residents to park, it is still very dangerous. As a cyclist I have on many occasions I have had to wait by the old shop to let cars through. It is quite alarming when cars are coming from both directions at once, it is a blind corner, often there is a car parked on the 'slow' sign painted on the road, and I have had to 'flag' the cars down to warn them. There should be a warning sign here that cars could be approaching on the wrong side of the road, there should also be a 20mph restriction throughout the built up areas of Cuddesdon and Denton.

within the transport section safe cycle tracks were seen as important and falling short within the area - safe footpaths are also important especially as the speed of traffic into and through the village is often unacceptable

Thank you for all the hard work putting the plan together

Statements all match the good ethos and show we are not living in the past and being negative

A vast amount of work has been done by the committee. It will all be wasted when the biodiversity, the views, the communities, the darkness, the peace etc is destroyed by an expressway.

Just thank you for all your efforts

Excellent document and gives an accurate picture of our community and its environs

## Appendix E – Summary of SODC Comments on to Pre-submission Consultation with Cuddesdon and Denton responses

Ref	Policy	Comments	Response by Cuddesdon and Denton
1	<p>General comment:</p> <p>We note that the NDP group have taken on board a lot of our comments and advice we have provided them with previously and we commend their efforts.</p>		
2	<p>Please note that the Secretary of State wrote to South Oxfordshire District Council on 9<sup>th</sup> October 2019 and imposed a Holding Direction on the Council which means we are unable to take any steps in connection with the adoption of our emerging Local Plan 2034 (link <a href="#">here</a>). The Holding Direction means the emerging Local Plan 2034 has no effect while the direction is in force (Housing and Planning Act 2016 (145) (5)(2)).</p>		Footnote added to para 1.3
3	<p>Page 2 – ‘5. As a ‘Smaller’ unsustainable settlement with minimal services and within the Green Belt, Cuddesdon and Denton is not expected to grow significantly.’</p>	<p>Please rephrase this paragraph as Cuddesdon is classified as a ‘smaller village’ however, Denton and Chippinghurst are not classified. Also when referring to Cuddesdon and Denton we recommend you refer to the Cuddesdon and Denton parish or neighbourhood plan area as this will also include Chippinghurst and surrounding areas of open countryside.</p>	<p>Redrafted:</p> <p><i>Cuddesdon is designated as a ‘Smaller’ unsustainable settlement with minimal services and within the Green Belt and is not expected to grow significantly. Denton and Chippinghurst are not classified meaning that growth is even less likely.</i></p>

Ref	Policy	Comments	Response by Cuddesdon and Denton
4	Page 2 – ‘9. The plan sets of a vision to ‘maintain Cuddesdon and Denton as a unique and desirable place to live for people at all stages of their lives...’	We recommend referring to the parish of Cuddesdon and Denton instead of just Cuddesdon and Denton to avoid excluding other areas that are found within the NDP area.	Cuddesdon and Denton has been used throughout to indicate the whole parish. This is its name. But appreciate this could be interpreted differently. So changed as suggested.
5	Page 8 – ‘1.1 Most people know that anyone waiting to make major modifications to their house or to put up a new one must get planning permission from the relevant council- or Planning Authority. In fact the planning process covers much more than just new housing.’	We recommend deleting the word major from the sentence as it is not just major modifications that require planning permission, for example in some circumstances a new window would require planning permission.	Changed

Ref	Policy	Comments	Response by Cuddesdon and Denton
6	<p>Page 8 – ‘1.2 When any development is being carried out that requires planning permission, this permission needs to be obtained from the relevant local planning authority. To help a local planning authority decide whether or not to give planning permission, the local planning authority will assess the proposal against the policies set out in its development plan.’</p>	<p>This sentence is a bit confusing as it makes it sound like development is already commencing before gaining planning permission.</p> <p>We therefore would recommend amending this sentence to:</p> <p>‘Development proposals that require planning permission will be considered by the local planning authority (South Oxfordshire District Council).’</p>	<p>Changed to:</p> <p><i>The planning authority will assess the proposals against the policies set out in its Local Plan before deciding whether or not to give planning permission.</i></p>
7	<p>Page 8- ‘1.3 In our case, the majority of planning applications will be determined by</p>	<p>Planning applications for the NDP area will be determined by South Oxfordshire District Council. If you accept the change suggested in comment 5 you will not need paragraph 1.3.</p>	<p>“Majority” deleted.</p>



Ref	Policy	Comments	Response by Cuddesdon and Denton
	South Oxfordshire District Council.'		
8	Page 9 – '1.6 Then, if they are approved by more than 50% of the community in a referendum they become part of the Development Plan, with the same legal status.'	As you are detailing the process in this section we therefore also recommend including a paragraph before this one to mention that an independent examination will take place prior to a referendum.	Process updated.
9	Page 9 –'1.7 The proposal to prepare a Neighbourhood Development Plan for Cuddesdon and Denton....'	We recommend amending this sentence to refer to the whole parish instead of just Cuddesdon and Denton.	Changed
10	Page 10 – Figure 2 – Map of Cuddesdon and Denton Parish	We have noticed that the red line showing the neighbourhood plan area has missed a tiny little bit by	Done

Ref	Policy	Comments	Response by Cuddesdon and Denton
		Sluice this needs to be amended, we have sent through the amended map via email already.	
11	Page 11 – ‘1.10 A grant from Locality was used to fund a Character Assessment by Lepus Consulting. A further grant from South Oxfordshire District Council was used to cover other costs.’	We recommend changing ‘to cover other costs’ to ‘to cover the costs of plan preparation.’	Done
12	Page 11 - ‘1.11 There will also be a public consultation on the draft Neighbourhood Plan with a public meeting near the end of the consultation period.’	Please amend this paragraph as it is referring to the pre-submission consultation which is yet to happen when in fact it would be happening alongside the publication of this version of the plan.	Done

Ref	Policy	Comments	Response by Cuddesdon and Denton
13	Page 11 - '1.12 This document is a fourth draft for discussion with South Oxfordshire District Council and others after incorporation of their comments and those made by the Committee and Parish Council.'	Please amend this paragraph as this is the presubmission consultation version not a draft for discussion with SODC.	Done
14	Page 11 - '1.13 When complete and if approved by a village referendum, the Plan will run for a 15 year period from 2019 to 2034.'	Please amend this sentence to:  'when complete and following a successful referendum, the plan will run for a 15 year period from 2019 to 2034.'	Done
	Page 15 - '4.3 Clearly Cuddesdon is on the borderline between a 'Smaller' and 'Other'	It is not clear what evidence this statement is based on. The settlement is identified as a smaller village in the Core Strategy 2012. The Settlement Assessment supporting our emerging Local Plan identifies Cuddesdon as a smaller	The evidence is the changes in classification based on changes in the scoring system set out in para 4.2.

Ref	Policy	Comments	Response by Cuddesdon and Denton
	<p>village. It has a pub which serves food and a recreation ground with play equipment and goal posts which are weighted to score high. It does not have any of the facilities which make a community sustainable - public transport, shops, school or surgery.'</p>	<p>village, the current wording seems to try and insinuate that there is an additional category that exists between the 'smaller and 'other' village category and cast doubt on its position, this is not the case. Some settlements classified as 'other villages' have a higher score, however other reasons beyond a simple numerical total have justified their lower classification, these reasons are highlighted in appendix 6 of the settlement assessment BP.</p> <p>The following facilities were scored:</p> <ul style="list-style-type: none"> <li>• Drinking establishment/restaurant x1 (score multiplied to give total of 2)</li> <li>• Place of Worship x1</li> <li>• Village/Community Hall x1</li> <li>• Sports Pitch x1</li> <li>• Allotments x1</li> <li>• Public Open Space x1</li> <li>• Playground x1</li> </ul> <p>The total services and facilities score for each settlement was doubled to give greater weight to this component of the overall score. For</p>	<p>The paragraph is not trying to insinuate that there is an additional category. It is reflecting the difficulty of any scoring system of capturing the nuances of the real world.</p> <p>The crucial point is that without public transport the parish cannot be considered sustainable.</p>

Ref	Policy	Comments	Response by Cuddesdon and Denton
		<p>Cuddesdon this gave a score of 16. Greater weight is given to facilities score over other aspects in the assessment based on the importance of a settlement being able to provide local services rather than these services having to be assessed in another settlement.</p> <p>Cuddesdon as a 'smaller village' is a sustainable settlement for limited growth. While public transport and access to shops, school or GPs surgery are important all the facility/service types in appendix 2 can contribute to the sustainability of a settlement. The weighting of the score in appendix 2 of the assessment reflects the importance/value of particular services. It is probably not proportional to expect the provision of many higher level facilities the smaller village category.</p> <p>As such the lack of certain service can be highlighted but not in the context of this making the settlement unsustainable.</p> <p>We suggest amending the wording to:</p>	

Ref	Policy	Comments	Response by Cuddesdon and Denton
		<p>'Cuddesdon is classified as a 'Smaller' village in the SODC Settlement Hierarchy. It has a pub which serves food and a recreation ground with play equipment and goal posts (list other facilities listed above) which are weighted based on their value to the sustainability of the settlement. However, the settlement lacks certain facilities which the community feels would make the settlement more sustainable- public transport, shops, school or surgery.'</p>	
16	<p>Page '4.5 the latest version of the National Planning Policy Framework discourages the growth of small unsustainable parishes such as Cuddesdon and Denton. It argues that 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and</p>	<p>The NPPF is not discouraging development instead please amend the paragraph to:</p> <p>The NPPF directs <b>significant</b> development to more sustainable locations. Development of an appropriate scale is not discouraged in less sustainable settlements.</p>	<p>Amended to "The latest version of the National Planning Policy Framework discourages significant development in unsustainable parishes such as Cuddesdon and Denton."</p>

Ref	Policy	Comments	Response by Cuddesdon and Denton
	offering a genuine choice of transport modes.'		
17	Figure 11 – Key views in the plan area	Neighbourhood plan policies cannot affect areas outside the designated neighbourhood area. Please amend the map so that there are no arrows outside the NDP area.	Will ask you to have it redrawn
18	Page 35 - Figure 12 – 20 photos	Please make sure all the photos are taken from public vantage points.	They were
19	Page 39 – '4.90 Cuddesdon and Denton is classified as a 'Smaller Village' in the District Council settlement hierarchy, meaning that it is not expected to grow significantly because of its lack of services and public transport, as well as the constraints of the	<p>Denton is not classified in the settlement hierarchy see appendix 4 of the Core Strategy, as such the first part of the paragraph needs to be amended to be in accordance with Policy CSR1.</p> <p>Please amend the paragraph to reflect Policy CSS1 of the South Oxfordshire Core Strategy 2012:</p> <p>'Cuddesdon is classified as a 'Smaller Village' while Denton is not classified in the District Council settlement hierarchy.</p>	<p>Changed to two paragraphs:</p> <p>3.13 Cuddesdon is classified as a 'Smaller Village' within the District Council settlement hierarchy. This means that Cuddesdon is not required to contribute towards delivering additional housing to meet the overall housing requirement of South Oxfordshire because of its lack of services and public transport. Given the constraints of the Green Belt, any growth will likely come from infilling, conversions or subdivision of existing properties</p>

Ref	Policy	Comments	Response by Cuddesdon and Denton
	Green Belt. Thus any growth will probably be due to infilling or conversions.'	<p>Cuddesdon is not required to contribute towards delivering additional housing to meet the overall housing requirement of South Oxfordshire. Developemnt proposals in Denton should relate to very specific needs such as those of the agricultural industry or enhancement of the environment.</p> <p>Cuddesdon is located in the Green Belt therefore additional growth will likely come from infilling, conversions or subdivision of existing properties.'</p>	<p>1.2</p> <p>Denton and Chippinghurst are not classified in the settlement hierarchy This means that development proposals in Denton and Chippinghurst should relate to very specific needs such as those of the agricultural industry or enhancement of the environment</p>
20	<p>Page 44 - POLICY CD1 – General Development Principles</p> <p>New development must conform to the following general principles:</p>	<p>As suggested before, to avoid being overly restrictive and unduly onerous we recommend replacing the first part of the policy with:</p> <p>'New development proposals will be supported where they have regard to the following general principles:'.</p>	<p>a) Taken straight from the made version of the Baldons Plan</p>



Ref	Policy	Comments	Response by Cuddesdon and Denton
	<p>a) Proposals for infill development within the built-up area of Cuddesdon itself will be supported, provided they accord with all relevant requirements set out in other policies in this plan and in the SODC adopted development plan; and</p> <p>b) The development preserves or enhances the important and valuable aspects of key views either of or from the settlements, as identified in the Character</p>	<p>In regards to the individual criteria we recommend the following:</p> <p>Criteria a - Policy H4 of the South Oxfordshire Local Plan 2011 cover infill development in a more detailed manner, we therefore recommend this criteria is removed.</p>	<p>This is included to show that we do support development within Cuddesdon; the type of development we support and to distinguish Cuddesdon from Denton and Chippinghurst.</p>
		<p>The Conservation team also raised the following comments in regards to criteria a:</p> <p>(a) Please consider how infill development might be achieved <i>and</i> preserve the views that are identified on the map. Do these aims conflict?</p>	<p>Do you mean criteria b)?</p> <p>In general the views don't go through the building lines so unlikely to conflict but each application should be considered on its merits.</p>
		<p>For criteria b we suggest the wording is amended to align with the Adopted Baldons NDP which was successful at examination. We suggest you use of the below wording:</p>	<p>Tense changed in this paragraph and two subsequent ones</p>

Ref	Policy	Comments	Response by Cuddesdon and Denton
	Assessment (Chapter 4) and detailed in Appendix C; and	<i>b) The development should preserve or enhance the important and valuable aspects of key views either of or from the settlements, as identified in the Character Assessment (Chapter 4) and detailed in Appendix C;and</i>	
	c) The development maintains the visual importance and setting of individual heritage assets and the Heritage Groups as designated in the Character Assessment (Chapter 4); and	Criteria c please amend the wording to use the term 'identified' instead of 'designated'. We also recommend amending the policy to require new development to: 'preserve the significance and contribution of setting of individual heritage assets...'	Done
	d) The development results in a net gain in biodiversity for the parish, where appropriate. The design of the development should enhance habitats for protected	Criteria D please amend the wording to:  d) Development should result in a net gain in biodiversity for the parish	Changed to The development results in a deliver a 10% increase in habitat value for wildlife compared with the pre-development baseline. In response to Natural England
		Criteria E:	Wording changed as suggested

Ref	Policy	Comments	Response by Cuddesdon and Denton
	<p>and notable species, i.e. bats, birds and pond dwelling animals and where relevant should follow the recommendations set out in the Landscape Character Assessment (Annex B).</p> <p>e) Proposals for development within the settlements of Chippinghurst and Denton and outside the built-up area of Cuddesdon itself will only be supported if they can demonstrate very special circumstances appropriate to the Green Belt and are consistent with all relevant requirements set out in other policies</p>	<p>Paragraph 145 of the NPPF identifies:</p> <p>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry;</p> <p>b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;</p> <p>c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</p> <p>d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages;</p> <p>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and</p>	

Ref	Policy	Comments	Response by Cuddesdon and Denton
	in this plan and in the SODC adopted development plan.	<p>g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or</p> <p>– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.</p> <p>Please amend criteria e) to align with paragraph 145 of the NPPF as development such as limited infilling, replacement of buildings and extensions etc would be acceptable.</p> <p>We suggest the following wording:</p> <p><i>e) Proposals for development within the settlements of Chippinghurst and Denton and outside the built-up area of Cuddesdon itself will only be supported if they are appropriate for a Green Belt Location or can demonstrate very special circumstances.</i></p>	

Ref	Policy	Comments	Response by Cuddesdon and Denton
21	Page 44 - Policy CD1- General Development Principles (d)	<u>The Countryside Team have provided the following comments:</u>	
	<u>Policy CD1(d):</u>  <i>“The development results in a net gain in biodiversity for the parish, where appropriate. The design of the development should enhance habitats for protected and notable species,  i.e. bats, birds and pond dwelling animals and where relevant should follow the</i>	<ul style="list-style-type: none"> <li>• I feel that “where appropriate” either needs to be explained in the justification text below or omitted. The forthcoming Environment Bill will legislate the requirement for developments to deliver <u>net gains in nearly all circumstances</u> (there will be some specific exemptions though).</li> <li>• Perhaps the <u>mitigation hierarchy</u> could be embedded in this policy wording?***</li> <li>• Reference made to priority habitats too?***</li> </ul> <p>We would suggest that the wording could be changed as follows:</p> <p><i>“The development results in a net gain in biodiversity for the parish. The design of the development should enhance habitats for species, i.e. bats, birds and pond dwelling animals and where relevant should follow the recommendations set out in the Landscape Character Assessment (Annex B).”</i></p>	Text changed in response to Natural England comments

Ref	Policy	Comments	Response by Cuddesdon and Denton
	<i>recommendations set out in the Landscape Character Assessment (Annex B)."</i>	***Please contact the neighbourhood planning team to explore how to address the questions raised by the council's Countryside Team.	
22	Policy CD2- Design Principles	The policy is overly restrictive and unduly onerous through the use of 'must', please amend 'must' to 'should'	Changed
		<p>The Conservation Team also provided the following comments in regards to criteria (a):</p> <p>You need to do more to describe the built quality of the village's character. Consider materials in more detail and perhaps explicitly incorporate this into part (b).</p>	Materials included in (b)
23	Policy CD3- Housing Infill	Development Management Officers have provided the following response:	This is what the policy says. It does not rule out all backland development
	'iv. is not considered to be	For the most part the NP looks like it is in accordance with the NPPF, our Core Strategy and SOLP but the infill policy	

Ref	Policy	Comments	Response by Cuddesdon and Denton
	<p>backland or unneighbourly development that requires unsuitable access, reduces the privacy of adjoining properties or is inconsistent with the character of the locality; and'</p>	<p>appears to rule out all backland development which is contrary to Policy H4 of SOLP. H4 allows backland where it does not create problems of privacy or access.</p>	
24	<p>Policy CD3- Housing Infill</p> <p>'iv. is not considered to be backland or unneighbourly development that requires unsuitable access, reduces the privacy of adjoining properties or is</p>	<p>The plan does not explain why backland development is not acceptable.</p> <p>Paragraph 70 of the NPPF 2019 identifies:</p> <p>'Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'</p>	<p>I thought neighbourhood Plans should avoid plain repetition of higher level plans and frameworks.</p> <p>The harm caused by inappropriate backland development are included in para iv: "unsuitable access, reduces the privacy of adjoining properties or is inconsistent with the character of the locality".</p>

Ref	Policy	Comments	Response by Cuddesdon and Denton
	inconsistent with the character of the locality; and'	We therefore recommend that the paragraph is simplified to include paragraph 70 of the NPPF 2019 and expanded to explain how backland development harms to the local area and why it should be avoided.	
25	Policy CD5- Community facilities  c) The Parish Council will also support the development of suitable facilities for young people provided	As the plan will be used to determine planning applications it would be more appropriate to amend the wording to:  'Development of suitable facilities for young people will be supported.'	Changed as suggested
26	General comment	Leisure Team comments:  It is noted from the Leisure Study that there are recreational facilities in Cuddesdon and Denton with a marked football pitch and an informal MUGA.	There was a marked football pitch but it has not been marked out for a number of seasons now. In any event it was for the private use of Ripon College Cuddesdon.  It is more than an aspiration to look at cycle routes. We would appreciate the Council taking up the inadequacy of the route to



Ref	Policy	Comments	Response by Cuddesdon and Denton
		The Leisure team would like to see the parish identify future aspirations to encourage residents to be more active. It is noted in the plan that you have mentioned an aspiration to look at the cycle routes the principle of which the Leisure Team supports.	Oxford with the County Council. We see it as basic sustainable transport, not leisure.  There are a number of other activities in the Village Hall – Over 60s exercise and Pilates – but these seem outside the scope of the plan.
27	General Comment	<p>Urban Design Team comments:</p> <p>I would just mention that they need to refer to the adopted south design guide and adhere to the principles within it. They mention the development plan but not the design guide SPD which should be their starting point. They can also refer to the now published National design guide</p> <p><a href="https://www.gov.uk/government/publications/nationaldesign-guide">https://www.gov.uk/government/publications/nationaldesign-guide</a></p> <p>Also their character assessment would benefit from a map showing where the main landmark buildings are (as shown in the pictures in the plan).</p>	Requirement to follow South Oxfordshire design Guide added at CD2 b) i)

Ref	Policy	Comments	Response by Cuddesdon and Denton
		When it comes to their specific design policies as long as they refer to the design guide, I have nothing else to add.	
Character Assessment			
28	The Conservation Team has provided the following comments in regards to the Character Assessment:	<p>The plan area includes heritage assets designated for their national significance and this represents an opportunity to appraise these assets so that they can be appropriately conserved. The character assessment does include assessment of some heritage assets fairly loosely and would benefit from a more in depth analysis of the historic environment.</p> <p>This would help to support the suggested policies.</p> <p><b>Comments:</b></p> <p>P16 Individual character assessments seems very light and would benefit from more historical background. Chippinghurst appears to be located at the site of a historic ford and ferry point over the River Thame. Denton appears to have grown around and along a brook. Perhaps consider</p>	Our main sources for the history of the parish are Victoria County History and Mark Chapman's book God's Holy Hill. Neither of these shed any light on the origin of either Denton or Chippinghurst. it would be good to have the references so that we can add these comments. But I have added some extra text from the VCH.

Ref	Policy	Comments	Response by Cuddesdon and Denton
		topography and the reasons for the growth of these settlements.	
		Was the Anglo-Saxon settlement of Cuddesdon built high for defensive and surveillance reasons? Does it have any strategic importance? I would suggest mentioning the significance of the 1847 archaeological discovery at the Bishops Palace which occupies the highest point in the parish.	Discovery already included in para 3.2. Or was there another discovery?
		P17 Consider whether there is a distinction between the development character of farm groups and the linear pattern of road fronting houses.	Included in para 4.24
		P17 4.25 Please clarify that the Victorian 'church' is the private Chapel of Ss. Peter and St Paul within the grounds of Bishops House and not the C12 parish church All Saints Church.	I <b>had</b> intended to refer to the church. Chapel added.
		P18 4.30 Vernacular buildings in the village are generally of limestone rubble construction (from Lye Hill quarries?) with steeply pitched clay tile or thatched roofs. Was there an earlier timber framing tradition as is known at Great Milton? The area was once heavily wooded. I think that	I would argue that the distinctive character has been lost over the course of the last century through the use of many other building materials including brick, reconstituted stone, Victorian Gothic stone

Ref	Policy	Comments	Response by Cuddesdon and Denton
		there is a fairly distinctive character to the plan area that is defined by the prevalence of local building stone.	and mock Tudor with hung tiles. Paragraph modified to recognise the vernacular materials
		<p>P19 4.37 Non-listed buildings are not formally protected and therefore we cannot control development that would otherwise be permitted development. Also, the NPPF para 197 requires that we consider these buildings ‘nondesignated heritage assets’ but that we must have a balanced judgement when considering the significance of that asset and the scale of harm. As such there may be instances in planning decisions where some harm may be permissible. I suggest that this is reworded to say that harm should be avoided unless there are material considerations to justify that harm. It is also recommended that a comprehensive list of these ‘non designated heritage assets’ is written up, photographed and described. This would help planners identify in planning decisions when they should be applying these additional heritage considerations and would allow the sustainability objectives in Table 5 (p40) to be met. Please see the Appendix to the Wallingford conservation area appraisal which shows how this could be done.</p> <p>P19 4.38 We can consider the contribution of the setting of heritage assets to their significance but in not all instance</p>	Changed to ‘avoid harm’ from ‘no harm’.

Ref	Policy	Comments	Response by Cuddesdon and Denton
		will the view make a direct and meaningful contribution to what makes the building special. I think that the issue of heritage and setting and the character of the settlement and plan area and views may need to be separated out.	
		P20 Table 2: It is a little confusing having the 'monuments' separated from the listed 'buildings' because there is a second category of heritage designated named a 'Scheduled Monument'. There are no official scheduled monuments that I know of within the plan area. I suggest that there is not a distinction drawn between listed monuments and listed buildings to avoid confusion.	For the layman, it is confusing that the memorials, tombs and crosses are listed as buildings! Tables combined.
		P20 4.40 Listing does place a duty to protect a listed building and the contribution make by their settings to their special instance. It is important to describe how and why these aspects of their setting make an important contribution to their special and historical architectural interest. For instance, you may demonstrate that Dovehouse Farm had a direct working relationship with the open fields that it worked and that this adds to our understanding of the building within a working landscape. All Saints Church Spire was designed to be architecturally prominent within the surrounding landscape and its	Comments added.

Ref	Policy	Comments	Response by Cuddesdon and Denton
		<p>visibility from the wider landscape is important as well as its dominance architecturally within the built setting of the village. Cuddesdon Mill was built specifically to harness the power of water therefore its relationship with the river is an essential part of its significance. Ripon College and the importance of its tranquil rural setting for the purpose of theological study.</p> <p>P22 Table 3 Heritage groups. This seems to be a sort of characterisation grouping exercise that you would normally find within a conservation area appraisal. Although we do not have a designated conservation area here, perhaps take this grouping further by describing in more detail the character of each of the groups. This could then be tied in with the NP policy for new development that respects the character of adjacent heritage groups.</p>	

## Appendix F – OCC comments with Cuddesdon and Denton responses

### Response from OCC with C&D responses added

**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** Wheatley Division

**Officer's Name:** Councillor Tim Bearder

**Officer's Title:** Local Member

**Date:** 08 October 2019

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### Comments

I fully support this extremely well researched and put together document. I applaud the aspiration to ensure there is a net biodiversity gain and the radial cycle route. I believe that the County must do everything that it can through rewards generated in the Connecting Oxfordshire initiative to provide support to this parish. It must ensure that residents have alternative transport options other than the car. If we manage to establish a community bus service I expect the concessionary fares to be supported on an ongoing basis and for grants to be made available from things like the Work Place Levy schemes that will benefit community transport.

### Cuddesdon and Denton response

Grateful for support

**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** Infrastructure Locality Oxford

**Officer's Name:** David Taylor

**Officer's Title:** Senior Transport Planner

**Date:** 19 September 2019

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### **Bus Strategy Comments**

The Parish extends from the boundary with Wheatley (which has a very frequent service between Oxford, Wheatley and Thame) and it also extends almost to the B480 which has an hourly bus service from Watlington to Oxford via Garsington.

Statement 2 part i discusses establishing the East Oxford Pick Me Up service in the Parish boundaries. As this service operates on a commercial basis, discussions regarding changes to this service would need to be undertaken directly between the Cuddesdon and Denton Parish Council and the bus operator.

The Council has no direct influence on Oxford Bus Company's Pick Me Up service – however it is understood that the economics are challenging and that the scheme area cannot be simply expanded without an impact on operating costs, commercial viability and on fares charged.

Some form of more localised bus service connecting into the trunk Thame-Wheatley Oxford route would be a more realistic proposition. However, such an arrangement would never be commercially viable and would require ongoing revenue support. It may be that several parishes in the area could cooperate and provide such a service if they have funding to do so.

<b>Cuddesdon and Denton response</b>
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Reference to Pick Me up service removed.
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**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** South & Vale Locality Team

**Officer's Name:** Harry Etchells

**Officer's Title:** Transport Planner

**Date:** 03 October 2019

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## Comments

Statement 2 part ii discusses “recognising the Oxford to Cuddesdon cycling route through Horspath as a radial route”. Dependent upon the strategic allocations adopted as part of any future SODC local plan, it may be possible to seek walking and cycling improvements between the site and Garsington primary school as part of the developer’s contributions. Further investigation would be required to establish the feasibility of this.

Statement 2 parts iii, iv and v will need to be considered in the context of compliance with Regulation 122 of the Community Infrastructure Levy Regulations 2010 Contributions can be sought for proposals as a result of new development in the Parish if the schemes meet the following three criteria:

- necessary to make the development acceptable in planning terms
- directly related to the development; and • fairly and reasonably related in scale and kind to the development.

Judgements about the feasibility/appropriateness of the measures specified in parts iii, iv and v would need to be made with specific regard to any particular development proposal as and when they come forward.

Statement 2 parts vi and vii refer to damage done to road surfaces in the area. Any minor damage done to road surfaces should be reported to Oxfordshire County Council’s Fix My Street website found at the following link:

<https://fixmystreet.oxfordshire.gov.uk/around?lat=51.72157&lon=-1.13408&js=1&zoom=1>

<b>Cuddesdon and Denton response</b>
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Fails to appreciate the issues
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**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** Waste Management

**Officer's Name:** Rachel Burns

**Officer's Title:** Waste Strategy Manager

**Date:** 20 September 2019

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### Comments

Waste reuse, reduction and recycling appear to have not been considered within the neighbourhood plan.

Oxfordshire councils have ambitious targets to reduce the amount of waste generated and increase the amount recycled as demonstrated in our Joint Municipal Waste Management Strategy 2018-2023.

Enabling the residents of new dwellings to fully participate in district council waste and recycling collections, for example through providing sufficient and convenient storage space for bins both inside properties and externally, will allow Oxfordshire's high recycling rates to be maintained and minimise an increase in residual waste.

Bin store provision which can accommodate the correct number of mixed recycling, refuse and food recycling bins, are safe and easy to use for both residents and waste collection crews and meets the requirements of the waste collection authority are required.

The Neighbourhood Plan may also wish to consider how their community spaces can be used to help reduce waste and build community cohesion through assets such as community fridges, space for the sharing economy (library of things), refill stations, space for local food growing etc.

#### **Cuddesdon and Denton response**

Requirements for bin store provision are covered in the South Oxfordshire Local Plan and it would be inappropriate to repeat them in the Neighbourhood Plan.

The plan now includes protection of the allotments as local green spaces.

**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** Minerals and Waste Policy Team

**Officer's Name:** Anna Herriman

**Officer's Title:** Minerals and Waste Planning Policy Officer

**Date:** 1 October 2019

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## **Comments**

Thank you for your consultation dated 19<sup>th</sup> September 2019. The area covered by the neighbourhood is not in a Strategic Resource Area and is also not in a Minerals safeguarding area. There are also no permitted Mineral and Waste sites within the area. Therefore, from a Mineral and Waste planning policy perspective, OCC has no comments to make.

**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** Environment Strategy team

**Officer's Name:** Haidrun Breith

**Officer's Title:** Landscape Specialist

**Date:** 04 October 2019

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### **Environment Strategy Comments**

Thank you for consulting us on this draft Neighbourhood Plan (NP) document.

We are very impressed with the effort that has gone into the production of the document especially with regard to landscape character, green infrastructure and biodiversity. We particularly welcome the production of the detailed Landscape Character Assessment for the Neighbourhood Plan (NP), which provides a comprehensive evidence base to the policies.

We welcome the strong emphasis on the natural environment in the NP and that policies seek the protection and enhancement of landscape character and valued views, net gains in biodiversity as well as the protection of local green spaces.

In order to avoid confusion and for ease of use the parish council may wish to clearer reference documents / policies referred to in the various sections of the document.

We welcome and fully support the requirements of the Neighbourhood Plan to achieve a net gain in biodiversity for the parish (policy CD1). Being mindful of emerging guidance from Defra / Natural England, which is expected to seek a min. 10% increase in biodiversity, the parish council may wish to add further detail on the required uplift with regard to biodiversity.

Notwithstanding that it might be outlined elsewhere we feel the Neighbourhood Plan statement sections (chapter 16) would benefit from some explanation on the status of the statements (compared to policies).

We fully support Statement 3 on landscape character and biodiversity which encourages land owners and managers to adopt practices to improve and expand existing habitats including aquatic habitats.

#### **Cuddesdon and Denton response**

10% increase in habitat value now included in Policy CD1

Index of policies included

Additional text on status of statements included in para 16.2

**District:** South Oxfordshire

**Consultation:** Cuddesdon and Denton Neighbourhood Plan (Draft Document)

**Team:** Archaeology

**Officer's Name:** Richard Oram

**Officer's Title:** Planning

Archaeologist

**Date:** 07 October 2019

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### Comments

The plan appears to define heritage assets as standing buildings only and makes no reference to below ground archaeological deposits. The definition of heritage asset within the NPPF makes it clear that archaeological deposits are also included in this definition.

The policy within Table 5 for cultural heritage will therefore need to be amended to make it clear that heritage assets also refer to archaeological deposits such as;

*To conserve and enhance the village's character and setting, in particular its designated and undesignated archaeological and built heritage assets.*

We would recommend that a historic environment policy is added to the aims and objectives as set out below;

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

*Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2019).*

These policies will then need to be updated for the specific policies within the plan.

### Cuddesdon and Denton response

General policies to protect heritage assets including designated and undesignated archaeological are already included in the South Oxfordshire Local Plan. It would not be appropriate to repeat them. The analysis and policies proposed in the Neighbourhood Plan are intended to provide a greater level of local detail to support the Local Plan.

## Annex G - Summary of responses from statutory organisations apart from SODCand OCC together with Cuddesdon and Denton response

### 1 Historic England

To whom it may concern:

Thank you for consulting Historic England on the pre-submission version of the Cuddesdon and Denton Neighbourhood plan.

We find this to be a well researched and useful document that should prove influential as a guide for decision makers in particular in assessing and prioritising the conservation of the parish's attractive character, which is so ably assessed and documented.

We have no objections to raise to the plan and congratulate the steering group on its preparations

Yours sincerely

Robert Lloyd-Sweet

Rob Lloyd-Sweet | Historic Places Adviser | South East England | Historic England

#### **Cuddesdon and Denton Neighbourhood Plan**

No response needed, just gratitude for the compliment!

### 2 Natural England

Dear Chris Luke,

#### **Planning Consultation: Cuddesdon and Denton Neighbourhood Plan**

Thank you for your consultation on the above dated 28 August 2019.

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 proposals made.

In our review of the Cuddesdon and Denton Neighbourhood Plan we have a few comments to make:

- **Objectives** – We would like to remind you of your commitments to the environment as set out the National Planning Policy Framework. We recommend strengthening your position on the environment and suggest adding a series of environmental objectives under a subheading of 'Environment'. Objectives could include:
  - To maintain and enhance biodiversity in the neighbourhood plan area, with a goal towards providing a net gain of biodiversity for all development proposals

- To create, protect, enhance and manage green infrastructure and networks of biodiversity
- To plan for biodiversity at a landscape-scale and safeguard and enhance connectivity of local ecological networks
- **Policies** – Following on from the objectives, we recommend creating a new set of Environmental Policies. We have provided a list of suggestions to include in the policies and have linked them to the relevant legislation for ease of reference:
  - **Net gain of biodiversity:** Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain for the neighbourhood plan area”. All development proposals should maintain and enhance existing on-site biodiversity assets, and provide for wildlife needs on site, where possible. Where appropriate, on-site enhancements such as new roosting features for bats or nesting features for birds should be incorporated into the fabric of development. Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculations are included in Annex A. For further reference, please see paragraphs 170 and 174 of the NPPF and Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act).
  - **Green infrastructure (GI):** Elements of GI such as open green space, wild green space, allotments and green walls and roofs can all be used create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people included recreation, health and wellbeing, access to nature, opportunities for food growing and resilience to climate change. Annex A provides examples of GI. Development proposals required to provide onsite green infrastructure must provide Green Infrastructure Management Plans, with proposals including funding for the long term management of the assets. For further reference, please see paragraph 171 of the NPPF.
  - **Connectivity:** Proposals for development should provide wildlife corridors that allow wildlife to move from one area of habitat to another. Where ecologically relevant, fences and walls are encouraged to incorporate features that allow dispersal of wildlife through areas of green space and gardens. We recommend keeping green space within villages and across developments in order to maintain connectivity of wider ecological networks. Green spaces in built up areas also help the health and wellbeing of residents. For further reference, please see paragraphs 117 and 174 of the NPPF.
  - **Brownfield land:** We recommend mentioning favouring developing on brownfield sites over greenfield sites, provided the brownfield land is not of high environmental value. Removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. For further reference, please see paragraphs 110 and 117 of the NPPF.
  - **Priority habitats and species:** Planning policies should promote the preservation, restoration and

recreation of priority habitats, and promote the recovery of priority species populations. Please consult Annex A for guidance on how to find priority species and habitats in this neighbourhood area. For further reference, please see paragraph 117 of the NPPF.

- We would like to remind you of the mitigation hierarchy (avoidance, mitigation, compensation). When considering development proposals, you are encouraged to think first how the harm to the environment can be avoided, followed by mitigation to minimise harm. Compensation, or offsetting, should be used as a last resort.

We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and sections 170 and 175 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain for the parish”.

The recently produced [Neighbourhood Plan for Benson](#), in South Oxfordshire provides an excellent example. We are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplar. We would recommend you considering this document, when reviewing yours.

#### Further Recommendations

Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final neighbourhood plan include:

- Policies around connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and wellbeing, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure;
- Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;

Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.

Yours sincerely

Lauren Schofield

Adviser

Sustainable Development

Thames Team



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

- Natural Environment Information Sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> 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](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. 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](#)<sup>4</sup>.

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

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup>

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

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making> <sup>5</sup> <http://magic.defra.gov.uk/>

'landscape') on the [Magic](#)<sup>5</sup> website and also from the [LandIS website](#)<sup>5</sup>, which contains more information about obtaining soil data.

- Natural Environment Issues to Consider

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

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

### Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan 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](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. 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](#)<sup>11</sup>) or protected species. Natural England has produced advice [here](#)<sup>12</sup> 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

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

<sup>6</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733637/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf)

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

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 175 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

#### Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve and enhance biodiversity. The NPPF section 170 states “*Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity...*”. Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric<sup>13</sup> and the environment bank biodiversity impact calculator<sup>14</sup>. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

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

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilotareas> Note; the ‘Guidance for developers’ and ‘Guidance for offset providers’ documents provide a calculation method.

<sup>14</sup> <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=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfkbJIJQ\\_UN0044Qe6rmiLffxckg](http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfkbJIJQ_UN0044Qe6rmiLffxckg)

### 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 170. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>15</sup>.

### **Green Infrastructure, Improving Your Natural Environment.**

Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for 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 creating 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.
- Considering how lighting can be best managed to encourage wildlife.
- Adding a green roof or walls to new or existing 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 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](#)<sup>16</sup>).
- 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).

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

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

### 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. Please refer to <http://livingroofs.org/> for a range of innovative solutions.

#### **Cuddesdon and Denton response**

This seems to be a standard letter sent out Neighbourhood Plan consultations. The objectives are proposed policies are already included as appropriate to our parish. They are also addressed by the South Oxfordshire Local Plan, which makes it unnecessary to repeat them.

10% biodiversity gain now included.

### 3 Scottish & Southern Electricity Networks

Thank you for your message below, together with the link to your NP web-site, regarding the above topic / location.

I can confirm that, at this present time, I have no comments to make

Chris Gaskell

Network Planning Engineer

#### **Cuddesdon and Denton response**

No response necessary

### Thames Water Planning Policy

Dear Sir/Madam,

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

Thames Water are the statutory water supply and sewerage undertaker for the South Oxfordshire District and are hence a **“specific consultation body”** in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the draft Neighbourhood Plan:

#### Specific Comments on Wastewater/Sewerage Infrastructure

Cuddesdon and Denton drains west to Cuddesdon Sewage Treatment Works (STW).

Thames Water has a duty to provide maintain and extend its networks to accommodate new development with funds for network upgrades coming from infrastructure charges <https://developers.thameswater.co.uk/new-connection-charging> and funds for STW upgrades coming from its strategic business plan

<https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/our-5-year-plan-for-2020to-2025>

The time to deliver infrastructure shouldn't be underestimated it can take 18 months – 3 years for local upgrades 3 – 5 years for those more strategic in nature

Developers should be encourage to engage with TW at the earliest opportunity more information here > <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Water-and-wastewater-capacity>

The scale of any sewerage/wastewater/water supply upgrades will depend on the type, scale and location of development that comes forward.

#### General Comments on Wastewater/Sewerage and Water Supply Infrastructure

We consider that the Neighbourhood Plan should include a policy relating to wastewater/sewerage and water supply infrastructure.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure

network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

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

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

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

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

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

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

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

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

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

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

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met;
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met; and
- The developments demand for water supply can be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:

<https://www.thameswater.co.uk/preplanning>

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

**PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT**

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

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



***approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."***

#### Comments in relation to Flood Risk and SUDS

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

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

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

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

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

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

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

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

Yours faithfully

**Thames Water Utilities Ltd**

**Cuddesdon and Denton response**

This seems to be a standard letter sent out Neighbourhood Plan consultations. The issues are addressed by the South Oxfordshire Local Plan, which makes it unnecessary to repeat them.