

Ewelme Neighbourhood Plan - publicity period

Response 1

Respondent Details

Information	
Respondent Number: 1	Respondent ID: 152593623
Date Started: 17/11/2020 08:16:48	Date Ended: 17/11/2020 08:21:18
Time Taken: 4 minutes 30 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Please see attached comments.

Q3. You can upload supporting evidence here.

- File: 20201117 Ewelme Reg 16 Response SODC.pdf

Q4. If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Please see attached comments.

Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Ewelme Neighbourhood Plan:

Don't know

Planning services

HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading

Contact officer: Robyn Tobutt

Robyn.Tobutt@southandvale.gov.uk

Tel: 01235 422600

17 Nov 2020

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

South Oxfordshire District Council has worked to support Ewelme Parish Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan review.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Ewelme Neighbourhood Development Plan (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

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

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

Robyn Tobutt

Robyn Tobutt
Senior Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1	General comments	<p>The emerging South Oxfordshire Local Plan (SOLP) is currently at examination. The Inspector issued his preliminary conclusions and post-hearing advice on 28 August 2020, the letter is available here. This letter sets out the preliminary conclusions on the key matters that arose during the examination, in order to provide clarity for the Council and all other parties at an early stage.</p> <p>The council recently undertook a six week consultation on the proposed main modifications, this ran until Monday 2 November 2020. The Schedule of Proposed Main Modification can be found on our website, link here.</p> <p>Regarding the next steps, the examination remains open until the Inspector has completed his report into the soundness of the SOLP. Before making a recommendation and publishing his final report, the Inspector can: request more information; ask for more work to be carried out; or require further hearing sessions to take place. The Inspector will consider the responses to the proposed main modification consultation before finalising his report.</p> <p>National Planning Practice Guidance highlights the importance of minimising any conflicts between policies in neighbourhood plans and those in the emerging local plan (Paragraph 009 Reference ID: 41-009-20190509). Some of the proposed main modifications to the SOLP may be relevant to the examination of this Neighbourhood Plan. Within this context, we would draw the examiner's attention to proposed modifications to Policy H16 (MM33) in the draft Schedule of Proposed Main Modification available here. At this stage, it is important to note that Policy H16 could be modified further.</p>
2	Plan period	We suggest that if it is the intention for the neighbourhood plan to align with the emerging Local Plan, as set out on page 7, that the plan period is extend to 2035.
3	<p>Page 20 – EP1: Natural environment, wildlife and biodiversity</p> <p>'Should make a positive contribution to the ecology of those sites'</p>	<p>The final bullet point is lacking clarity as it is not clear what 'those sites' is referring to. We assume that it is referring to the Brook and Nature Reserve and would suggest that 'those sites' is replaced with '<i>the Brook and Nature Reserve</i>'.</p> <p>To improve the overall clarity and readability of the second element of the policy we recommend that semicolons are put at the end of the first three bullet points, with the penultimate point ending with '<i>;and</i>' and a full stop on the final point.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>The Ecologist Officer provided comments in the Regulation 14 consultation and we can see that the NDP group has positively taken these suggestions on board. Further improvements could be made to the policy to make it more locally specific, for example encouraging the restoration of biodiversity within the neighbourhood area such as Cow Common or within the Chilterns Escarpment Central Conservation Target Area, which is situated within the South Eastern part of the parish.</p>
4	<p>Page 23 – EP2: Protection of Views</p>	<p>This policy is helpfully supported by a map (Figure 7) showing the extent and location of the identified important views and also the Protection of Views document. To improve the clarity of the policy we suggest that the view references on Figure 7 and in the Protection of Views document are included in the policy.</p> <p>We suggest the bullet points in the policy are replaced with:</p> <ul style="list-style-type: none"> - <i>IV1 – Ewelme Village from the roadside at the top of Rabbits Hill;</i> - <i>IV2 – Ewelme Church and Old Rectory glimpsed from Green Lane;</i> - <i>IV3 – View of Ewelme in the valley of Ewelme Brook from Footpath 22; and</i> - <i>IV4 – Looking towards the Wessex Downs with the Views, Winmill Farm and part of the airfield in the foreground.</i> <p>This suggested text is taken from the Protection of Views document.</p>
5	<p>Page 25</p> <p>‘Overall, this Neighbourhood Plan promotes sustainable development which is in keeping and character with the surrounding built environment...’</p>	<p>Grammatical correction – delete ‘and character’.</p>
6	<p>Page 26</p> <p>‘The emerging Local Plan 2034 does not seek any target for extra housing in smaller villages as</p>	<p>To better align with the emerging Local Plan we suggest ‘does not seek any target for extra housing in smaller villages’, with:</p> <p><i>‘does not require smaller villages to contribute towards delivering additional housing’</i></p>

Ref.	Section/Policy	Comment/Recommendation
	defined in the settlement hierarchy (appendix 7), beyond windfall and infill development to meet the overall housing requirement of South Oxfordshire.'	
7	Page 26 'This policy defines the term "Built-up area" for the purpose of enabling limited infill development and resisting other development outside of the Built-up area.'	This sentence is overly restrictive in its assumption that 'other development' will be resisted outside of the built-up area. It would be more accurate to add ' <i>not appropriate to the countryside location</i> ' after 'other development'. This acknowledges that other appropriate development may come forward outside of the built-up area.
8	Page 27 – EP3: A Spatial Plan for the Parish Proposals for limited infill development inside the Village's Built-up area (ref 6.5 para 4) will be supported, provided they accord with the design and development management policies of this plan, the development plan and the SODC Design Guide (including accompanying technical documents), and are in keeping with the character of the surrounding area as identified in the Village Character Assessment.	We recommend that the first sentence is reconfigured to better reflect the status of the documents referred to and to improve the clarity of the policy wording. We suggest the following: <i>'Proposals for limited infill development inside the Village's Built-up area (ref 6.5 para 4) will be supported, provided they accord with the design and development management policies of this plan, and the development plan.</i> <i>Proposals should have regard to the SODC Design Guide (including accompanying technical documents), and should be in keeping with the character of the surrounding area as identified in the Village Character Assessment.'</i>
9	Page 29 – EP4: Protecting our Open Spaces	This policy lacks clarity and the two statements within it set out two different tests. The first paragraph states that development 'will be supported where it does not have a significant impact', whereas the second sentence states that residential development 'will be supported provided it protects'.

Ref.	Section/Policy	Comment/Recommendation
		We suggest the second sentence is deleted from the policy.
10	Page 30 – EP5: Housing Mix	<p>In paragraph A the word ‘<i>be</i>’ should be inserted after ‘will’ and ‘require’ should be amended to ‘<i>required</i>’. This will improve the overall clarity of the policy.</p> <p>Comments from the Affordable Housing Team:</p> <p>On Section EP5: Housing Mix, Section 4.4: Objective H1, Section 6.1: Paragraph 1</p> <p>Although it is appreciated that the need for ‘smaller homes’ was identified within the scoping survey, all housing developments of 10 or more dwellings will seek to contribute towards a balanced mix of housing, in conjunction with the district-wide housing need. It is suggested amendments to bullet point 2 of section EP5, objective H1 of section 4.4 and the latter stages of section 6.1 paragraph 1 to address the district wide housing need, rather than the specificity of smaller dwellings.</p> <p>However, all housing development on rural exception sites will seek to contribute towards a mix of housing which meets a more localised need, derived from an up to date housing needs survey, justifying an appropriate mix.</p>
11	Page 31 ‘Respondents rated planaffordable housing and affordable rented housing as very important or important.’	Grammatical correction – delete ‘plan’ from ‘planaffordable’.
12	Page 32 – EP7: Parking	For clarity we recommend that the document is referred to in full as the ‘South Oxfordshire Design Guide’.
13	Page 38 – EP8: Conserving and Enhancing Heritage Assets	<p>Designated Heritage Assets</p> <p>The policy currently sets out that new development should conserve or enhance the ‘character, appearance, integrity, significance, fabric and setting of Ewelme’, this is overly restrictive as the test for conserving and enhancing relates to heritage assets, it should not be broadly applied to Ewelme. We recommend that ‘Ewelme’ is replaced with ‘Conservation Area’</p>

Ref.	Section/Policy	Comment/Recommendation
		As the policy also refers to the 'South Oxfordshire Local Plan 2011-2034', we would suggest that this is amended in line with our overall comment above.
14	Page 40 'As a minimum, and subject to viability and deliverability in accordance with paragraph 173 in the National Planning Policy Framework.'	Paragraph 173 of the NPPF refers to Heritage Coast, therefore this is an incorrect reference.
15	Page 41 – EP9: Sustainable and High-Quality design	To improve the clarity and readability of the policy we recommend that semicolons are put at the end of the first four bullet points, with the penultimate point ending with ';and'.
16	Page 46 – EP11: Economy	To improve the clarity and readability of the policy we recommend that semicolons are put at the end of the first two bullet points, with the penultimate point ending with ';and'.
17	Page 46/47 – Chapter 9. Community Infrastructure Levy	<p>Comments from our Infrastructure Claims Team:</p> <p>Removal of reference to Regulation 123 list, for which the requirement was removed in the September 2019 CIL regulations change. This removed pooling restrictions which now permits both CIL and S106 contributions to be used for the same project.</p> <p>'This money must be spent on infrastructure' – CIL monies (CIL Regs 59C) can be spent on the provision, improvement, replacement, operation or maintenance of infrastructure, or anything else that is concerned with addressing demands that development places on an area. However, CIL may only be used to fund a project in an area that has experienced housing growth. The Levy can be used to increase the capacity of existing infrastructure or to repair failing infrastructure if that is necessary to support development. The wider definition means that the neighbourhood portion can be spent on things other than infrastructure (as defined in the Community Infrastructure Levy regulations) provided it is concerned with</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>addressing the demands that development places on the parish's area.</p> <p>To reflect this accurately we recommend, 'This money must be spent on infrastructure', is replaced with '<i>This can be spent on things concerned with addressing the demands that development places on the parish area</i>'.</p>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	-
Name	Robyn Tobutt
Job title (if relevant)	Senior Planning Policy Officer
Organisation (if relevant)	South Oxfordshire District Council
Organisation representing (if relevant)	-
Address line 1	135 Eastern Avenue
Address line 2	-
Address line 3	-
Postal town	-
Postcode	OX14 4SB
Telephone number	-
Email address	robyn.tobutt@southandvale.gov.uk

Response 2

Respondent Details

Information	
Respondent Number: 2	Respondent ID: 153062707
Date Started: 23/11/2020 09:48:00	Date Ended: 23/11/2020 10:12:13
Time Taken: 24 minutes 12 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response was received via email from Secretary of State for Defence:</p> <p>Please see the attached letter setting out representations on behalf of the Secretary of State for Defence.</p>

<p>Q3. You can upload supporting evidence here.</p>
<ul style="list-style-type: none">• File: 202010 Benson Ewelme NP Ltr.pdf -• File: 202010 RAF Benson.pdf -



Defence Infrastructure Organisation

Defence Infrastructure Organisation
Base Support Wing Headquarters
RAF Brize Norton
Carterton, Oxfordshire
OX18 3LX
United Kingdom

Ref: Benson/EwelmeNP/SODC/Ltr

Telephone: +44 (0) 7500 105537

E-mail: Stephen.Harness848@mod.gov.uk

To be delivered via email only to: planning.policy@southoxon.gov.uk

21 October 2020

Dear SODC Planning Policy team,

EWELME NEIGHBOURHOOD PLAN

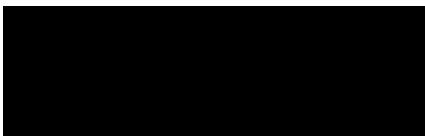
Firstly, we would like to thank the Planning Authority for the opportunity to comment on the above emerging neighbourhood plan. As you will be aware the designated area for the plan includes a section of land owned by the Ministry of Defence (see attached plan). It is therefore important that the plan recognises the need to take account of National Security interests for development within that area.

Set out overleaf are representations made in respect of the emerging plan. We would be grateful if you could take them into account in the preparation of the next stages.

We would be grateful if you could add our multi-user email address to your contacts list for consultation over future stages of the plan: DIOODC-TownPlanning@mod.gov.uk

If you have any questions arising, please contact me on 07500-105537 in the first instance.

Yours sincerely,



Stephen J Barrington Harness

Chartered Town Planner, MSc FRTPI FWCMT

EWELME NEIGHBOURHOOD PLAN – REPRESENTATIONS ON BEHALF OF THE SECRETARY OF STATE FOR DEFENCE.

Background:

In line with the National Planning Policy Framework (NPPF)ⁱ it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. As such operational development on MOD establishments should be supported. In turn, due to the need to maintain operational capabilities, development in proximity of MOD Establishments should be required to demonstrate that they align with the ‘agent of change’ principle found in paragraph 182 of the NPPFⁱⁱ.

Noise:

It should be noted that the controls on levels of noise arising from MOD establishments are not the same as for other properties. These noise levels can vary significantly according to operational needs. It is therefore important to consider the possible impacts on proposed adjacent development of such noise and the need to incorporate appropriate mitigation (if possible). It would be good practice for Planning Authorities to consult DIO on all significant planning applications near to the boundary of an MOD establishment, the email address for such consultations is: DIOODC-TownPlanning@mod.gov.uk

Safeguarding:

This response is separate from any made in respect of the safeguarding of MOD assets. For further information on MOD safeguarding, contact:

For statutory safeguarding: dio-safeguarding-statutory@mod.gov.uk

For wind turbine safeguarding: dio-safeguarding-wind@mod.gov.uk

Neighbourhood Plans:

The case of Daws Hill v Wycombe (C1/2013/0861) established that land should not be included in neighbourhood plans where it would lead to ‘false expectations’ (para 22). Neighbourhood plans should therefore be realistic about what they can control. It should be noted that separate legislation applies to the Crown estate and the operational military nature of MOD sites means that engagement and enacting of Neighbourhood plans to cover the area would not be appropriate. It is therefore suggested that designated Neighbourhood Plan areas should exclude MOD establishments. But it is recognised that the Planning Authority has designated the Neighbourhood Plan area for Ewelme to include some of the MOD land (see attached plan).

Ewelme Neighbourhood Plan

Page 27, Policy EP3: Reference is made in this policy to potential development between Ewelme and Cottesmore. It should be noted that this area is on the approach to one of the runways at RAF Benson. In accordance with the above matters in respect of safeguarding and noise, it is important that the Planning Authority consults the MOD in respect of developments in that area. It would not appear to be suited to additional residential development in that area and would suggest that the plan acknowledges that fact.

It should be recognised that the plan area includes MOD land. Accordingly, the wording of this policy is not appropriate where it states, *“Development proposals on land outside the Village’s Built-up area will be supported only if they are appropriate to a countryside location and are in accordance with the development plan.”* In line with the NPPF as explained above it is important that the plan recognises the National Security need for operational development on the MOD land, as appropriate. That land is “outside the village’s built-up area”. So, the policy wording should be amended accordingly.

It should also be acknowledged in the plan that it does not account for Service Families Accommodation (SFA) needs, so those should be considered separately and an acknowledgement to that effect should be included in the plan.

Additional: Sited around the perimeters of the airfield are a number of “crash gates”. These are used in the case of emergency to exit or enter the site (as appropriate). It is therefore important that any development does not block access to these gates or lead to a build up of traffic that would block access to the gates. This need should be recognised in the policies of the emerging plan.

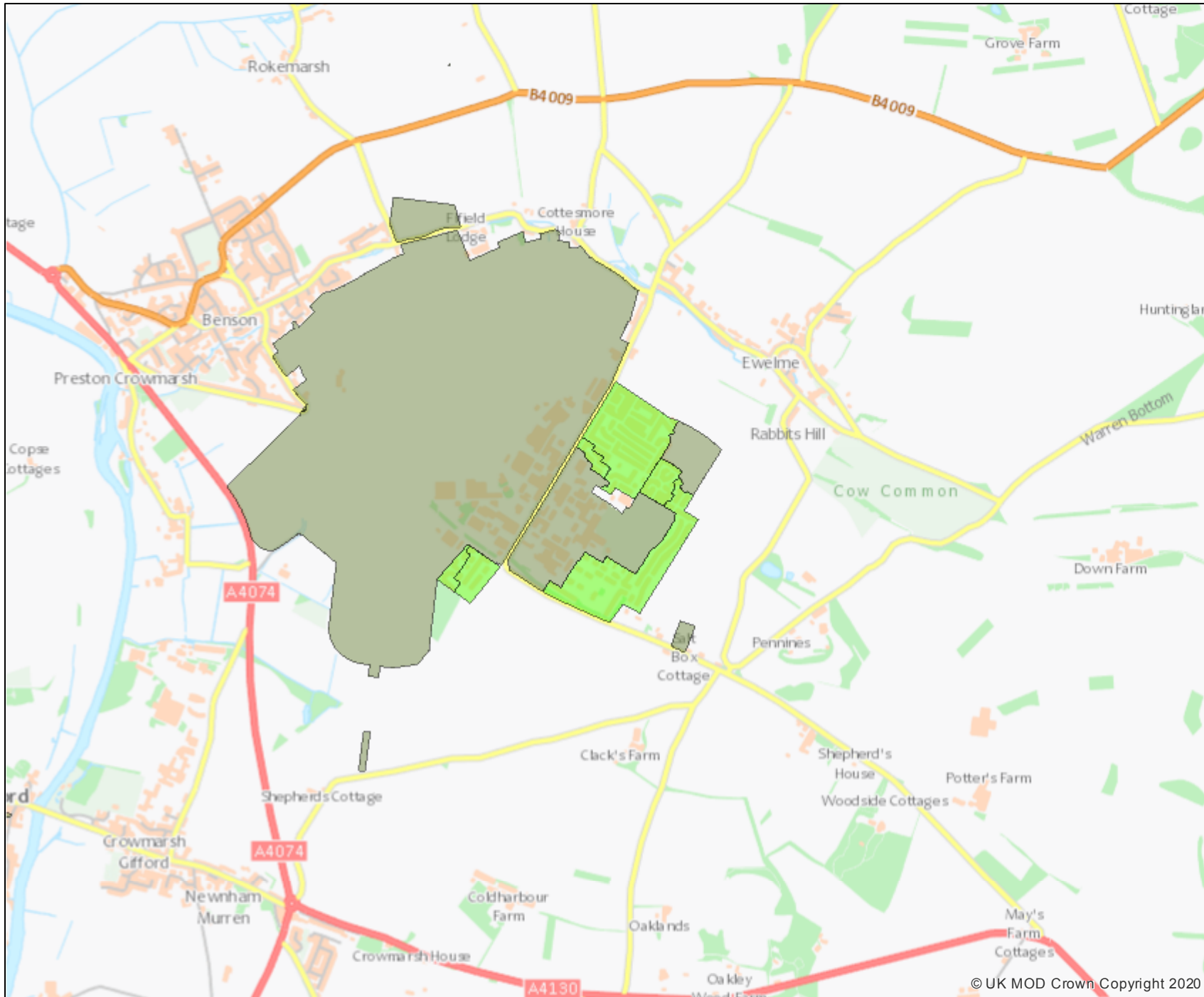
ⁱ NPPF paragraph 95. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate⁴¹. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

ⁱⁱ NPPF paragraph 182: Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of

development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Official



**Defence
Infrastructure
Organisation**

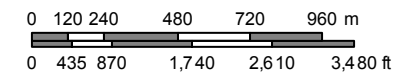
RAF Benson

RAF Benson - MOD Land

Legend

Name :

Date : 21th October 2020



Map Centre Coordinates:
463,669 190,892

This map has been produced using a web-based application, definitive measurements should not be calculated from it.

© Crown Copyright and database right 2015, Ordnance Survey 100023818.



© UK MOD Crown Copyright 2020

Official

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	Mr
Name	Stephen J Barrington Harness
Job title (if relevant)	Chartered Town Planner
Organisation (if relevant)	Defence Infrastructure Organisation
Organisation representing (if relevant)	-
Address line 1	Base Support Wing Headquarters
Address line 2	RAF Brize Norton
Address line 3	-
Postal town	Carterton, Oxfordshire
Postcode	OX18 3LX
Telephone number	+44 (0) 7500 105537
Email address	Stephen.Harness848@mod.gov.uk

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified

Response 3

Respondent Details

Information	
Respondent Number: 3	Respondent ID: 153064794
Date Started: 23/11/2020 10:12:43	Date Ended: 23/11/2020 10:37:56
Time Taken: 25 minutes 13 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response was received via email from Scottish & Southern Electricity Networks:</p> <p>Dear Planning Policy / Dorottya,</p> <p>Thank you for your message below, together with the link to your NP web-site, regarding the above topic / location.</p> <p>I can confirm that, at this present time, I have no comments to make</p>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	Mr
Name	Chris Gaskell
Job title (if relevant)	Network Connections Planning Engineer
Organisation (if relevant)	Scottish & Southern Electricity Networks
Organisation representing (if relevant)	-
Address line 1	1 Woodstock Road
Address line 2	-
Address line 3	-
Postal town	Yarnton, Kidlington, Oxfordshire
Postcode	OX5 1NY
Telephone number	+44 (0) 1865 845888
Email address	chris.gaskell@sse.com

Response 4

Respondent Details

Information	
Respondent Number: 4	Respondent ID: 153067294
Date Started: 23/11/2020 10:39:26	Date Ended: 23/11/2020 10:47:29
Time Taken: 8 minutes 2 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response were received via email from Oxfordshire County Council:</p> <p>Thank you for your email of 29th September 2020 inviting comment on the Ewelme Submission Neighbourhood Plan. The village is located within the Chilterns AONB and much of the village is in the Ewelme Conservation Area. The Submission Plan proposes no housing allocations.</p> <p>We provided comments on the draft submission neighbourhood plan in July 2019. The comments related to the Chilterns AONB and provision for car parking, walking and cycling. Our comments have been addressed and amendments made which we welcome.</p> <p>We therefore have no comments to make at this stage, other than to wish the Ewelme Neighbourhood Plan committee well.</p>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	-
Name	Lynette Hughes
Job title (if relevant)	Principal Planner
Organisation (if relevant)	Oxfordshire County Council
Organisation representing (if relevant)	-
Address line 1	County Hall, New Road
Address line 2	-
Address line 3	-
Postal town	Oxford
Postcode	OX1 1ND
Telephone number	-
Email address	Lynette.Hughes@oxfordshire.gov.uk

Response 5

Respondent Details

Information	
Respondent Number: 5	Respondent ID: 153068014
Date Started: 23/11/2020 10:47:40	Date Ended: 23/11/2020 10:52:24
Time Taken: 4 minutes 43 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response was received via email from Historic England:</p> <p>Thank you for consulting Historic England on the Submission version of the Ewelme Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment, including advising on planning policy to secure the conservation and enjoyment of heritage assets and champion good design in historic places. As such we will only comment on planning issues that fall within our remit and silence on other matters should not be read as agreement or consent.</p> <p>I am happy to confirm that Historic England have no objections to policies and proposals contained within the submission version of the plan.</p> <p>We are pleased to note that the steering group have added to the assessment of the protected views identified through Policy EP2 and now consider that the evidence document supporting this policy provides a model of succinct and clear analysis of the positive characteristics of these views, several of which form an experience of the setting of a number of designated heritage assets.</p> <p>We do feel that Policy EP8 could benefit from some clarification of which elements apply to designated heritage assets, non-designated heritage and/or the character of the village (as opposed to the conservation area). With regard to the conservation of non-designated heritage assets we would suggest that 'great weight' is reserved for the conservation of designated heritage assets within the policies of the National Planning Policy Framework, whilst the conservation of nondesignated assets is given weight, considered against the benefits that development would provide.</p> <p>We hope these comments are of assistance to the examiner but would be pleased to answer any queries that may arise from them.</p>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	Mr
Name	Robert Lloyd-Sweet
Job title (if relevant)	Historic Places Adviser
Organisation (if relevant)	Historic England
Organisation representing (if relevant)	-
Address line 1	Cannon Bridge House
Address line 2	25 Dowgate Hill
Address line 3	-
Postal town	London
Postcode	EC4R 2YA
Telephone number	07825 907288
Email address	Robert.LloydSweet@HistoricEngland.org.uk

Response 6

Respondent Details

Information	
Respondent Number: 6	Respondent ID: 153068447
Date Started: 23/11/2020 10:52:36	Date Ended: 23/11/2020 14:35:57
Time Taken: 3 hours 43 minutes 20 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Agent

Your comments

Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.
<p>The below response were received via email from Avison Young on behalf of National Grid:</p> <p>Please find attached our letter of representation.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: National Grid 17.11.20.pdf -

Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

17 November 2020

avisonyoung.co.uk

South Oxfordshire District Council
planning.policy@southoxon.gov.uk
via email only

Dear Sir / Madam
**Ewelme Neighbourhood Plan Regulation 16 Consultation
September – November 2020
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has not identified any proposed development sites crossed or in close proximity to National Grid assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	Mr
Name	Matt Verlander
Job title (if relevant)	Director
Organisation (if relevant)	Avison Young
Organisation representing (if relevant)	National Grid
Address line 1	Central Square South
Address line 2	Orchard Street
Address line 3	-
Postal town	Newcastle upon Tyne
Postcode	NE1 3AZ
Telephone number	0191 269 0094
Email address	matt.verlander@avisonyoung.com

Response 7

Respondent Details

Information	
Respondent Number: 7	Respondent ID: 153091367
Date Started: 23/11/2020 14:36:18	Date Ended: 23/11/2020 14:45:00
Time Taken: 8 minutes 41 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response was received via email from Natural England:</p> <p>Thank you for your consultation about the Ewelme Neighbourhood Plan. Please find attached Natural England's Response.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: Natural England Response 29.10.2020.pdf

Date: 29 October 2020
Our ref: 329206



South Oxfordshire District Council

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir or Madam,

Ewelme Neighbourhood Plan - REG 16 consultation request

Thank you for your consultation on the above dated 29 September 2020 .

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

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

Environmental policies at the neighbourhood plan level are a good opportunity to define local priorities for biodiversity conservation and enhancement, and to think about identifying key habitats, species and opportunities to improve habitat connectivity and green infrastructure. While the environmental objectives provide a good foundation, and the section on 'The Natural Environment' offers a good overview, the environmental policies could be extended to cover a wider area within the parish than the land mentioned in EP1.

We highlight to the parish the opportunity for any new developments coming forward to provide Biodiversity Net Gain, as a key tool to help nature's recovery and as fundamental to health and wellbeing.

Planning Practice Guidance describes net gain as an '*approach to development that leaves the natural environment in a measurably better state than it was beforehand*' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the [Biodiversity Metric 2.0](#), can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

Annex 1 provides more detail on the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully,
Isabella Jack
Sustainable Development Adviser
Thames Solent Area Team, Natural England

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

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

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

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

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

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

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

¹ <http://magic.defra.gov.uk/>

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

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

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

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

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

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

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. 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 or enhanced or new features you would like to see created as part of any new development. Examples might include:

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

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

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

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

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

¹³ <http://publications.naturalengland.org.uk/publication/35012>

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- 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).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	-
Name	Isabella Jack
Job title (if relevant)	Sustainable Development Adviser
Organisation (if relevant)	Natural England
Organisation representing (if relevant)	-
Address line 1	Hornbeam House
Address line 2	Crewe Business Park
Address line 3	-
Postal town	Crewe, Cheshire
Postcode	CW1 6GJ
Telephone number	0300 060 3900
Email address	Isabella.Jack@naturalengland.org.uk

Response 8

Respondent Details

Information	
Respondent Number: 8	Respondent ID: 153092226
Date Started: 23/11/2020 14:45:31	Date Ended: 23/11/2020 14:52:51
Time Taken: 7 minutes 19 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response was received via email from Thames Water:</p> <p>Dear Sir/Madam,</p> <p>Thames Water are the statutory water supply and sewerage undertaker for the Ewelme Neighbourhood Plan area and the whole of the South Oxfordshire District and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Thames have previously commented on the draft Neighbourhood Plan and wish to make the following comments:</p> <p>Policy EP9 – Sustainable and High-Quality design</p> <p>Thames Water support Policy EP9 specifically the bullet which states "demonstrate that, in consultation with Thames Water, the waste water network and treatment works either already have sufficient capacity or will be upgraded to provide sufficient capacity before any new development is occupied. "</p> <p>Thames Water operate a pre-planning service where by developers can make early contact with us in order to discuss their development proposal. Accordingly we would like to request the supporting paragraphs to Policy EP9 are strengthened to include the following:</p> <p>"Thames Water encourages developers to use their free pre-planning service https://www.thameswater.co.uk/preplanning). This service can tell developers at an early stage if there will be capacity in Thames Water and/or wastewater networks to serve their development, or what they will do if there is not.</p> <p>The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes."</p> <p>We hope this is of assistance. If you have any questions please do not hesitate to contact Stefania Petrosino on the above number.</p> <p>Yours sincerely, Thames Water Utilities Ltd</p>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	-
Name	Natasha Hurley
Job title (if relevant)	Planning Administrator
Organisation (if relevant)	Savills
Organisation representing (if relevant)	Thames Water
Address line 1	Hawker House
Address line 2	5-6 Napier Court
Address line 3	-
Postal town	Reading
Postcode	RG1 8BW
Telephone number	+44 (0) 79717 63964
Email address	tasha.hurley@savills.com

Response 9

Respondent Details

Information	
Respondent Number: 9	Respondent ID: 153092958
Date Started: 23/11/2020 14:53:04	Date Ended: 23/11/2020 15:02:50
Time Taken: 9 minutes 46 seconds	Translation: English
IP Address: [REDACTED]	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Ewelme Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>The below response was received via email from The Environment Agency:</p> <p>Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for Ewelme We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. Based on the environmental constraints within the area – statutory main river of the Ewelme Brook, we have some minor comments to make in relation to the Plan at this stage. Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:</p> <p>http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf</p> <p>Watercourses: The Ewelme Brook runs through the neighbourhood plan area. We are content that Policy EP1: Natural environment, wildlife and biodiversity includes provision for a 10m buffer zone either side of this important chalk stream. We would suggest a minor amendment to the second bullet point in this policy, to read: Are located at least 10 metres from the top of the banks of the river concerned</p> <p>This watercourse is classified within the Thames River Basin Management Plan as having moderate status according to Cycle 3 (2019). The reasons it is failing to achieve good ecological status/potential is due to the Fish element being Moderate. Some Reasons for not achieving good (RNAGs) were identified in Cycle 2 (2016) as Physical Modification by Urbanisation and Barriers. There are some further comments that mention widespread culverting and degraded habitats, with several barriers to fish migration and concrete banks. There are also impacts from cressbeds where the channel is over-widened.</p> <p>To note, there are also possible issues with Phosphate (Moderate), and also fails on a number of chemical measures (Perfluorooctane suphonate, Cypermethrin & mercury).</p> <p>We would welcome the opportunity to work with the/your neighbourhood forum on this to ensure environmental infrastructure is taken into consideration when looking to fund local infrastructure.</p> <p>Developments within or adjacent to this watercourse should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan. An assessment of the potential impacts of the neighbourhood plan on this watercourse under WFD should be included within any SEA/SA appraisal.</p>

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

Title	Mr
Name	Alex Swann
Job title (if relevant)	Planning Adviser
Organisation (if relevant)	The Environment Agency
Organisation representing (if relevant)	-
Address line 1	Red Kite House
Address line 2	-
Address line 3	-
Postal town	Wallingford
Postcode	OX10 8BD
Telephone number	02077140593
Email address	Planning_THM@environment-agency.gov.uk