

## **TIDDINGTON-WITH-ALBURY NEIGHBOURHOOD PLAN**

### **REGULATION 14 ANALYSIS: STATUTORY BODIES**

#### **1. Introduction**

1.1 This note summarises the representations made by the statutory bodies on the Pre-Submission version of the Tiddington-with-Albury Neighbourhood Plan (TNP) during its recent 'Regulation 14' consultation period. It concludes by recommending main modifications to the TNP so that it may be submitted to the local planning authority, South Oxfordshire District Council (SODC), to arrange for its examination and referendum.

#### **2. Representations**

2.1 Representations have been received from:

- a. Oxfordshire County Council (OCC)
- b. SODC
- c. Fisher German (on behalf of landowner of 46 Ickford Road)
- d. Natural England
- e. National Grid
- f. Thames Water
- g. National Highways
- h. Coal Authority
- i. Great Haseley Parish Council

2.2 Other statutory bodies were consulted but none have made representations. The representations from National Highways (g.), the Coal Authority (h.) and Great Haseley Parish Council (i.) raised no specific issues on the TNP.

2.3 Thames Water (f.) recommends that the TNP include policies on early engagement for new water/wastewater infrastructure, water efficiency and surface water drainage. The adopted South Oxfordshire Local Plan 2035 contains provisions in all of these respects, notably Policies INF1: Infrastructure Provision and INF4: Water Resources. §16 of the National Planning Policy Framework (NPPF) is clear that plans should avoid unnecessary duplication of policies and it is therefore not considered necessary to duplicate policies of this nature in the TNP.

2.4 The National Grid (e.) indicates that there is a gas transmission line which falls within the neighbourhood area boundary. As the TNP does not make any allocations for new development, the information does not require amendments to the policies of the TNP.

2.5 Natural England's (d.) response appears to be an identical response to that provided to the screening opinion of the TNP. **It is therefore recommended that**

**Natural England are encouraged to submit comments on the content of the TNP as quickly as possible.**

### **3. Analysis**

3.1 The representations, notably those of OCC and SODC, include suggested minor modifications to the text of the document, as well as those of more consequence. This note focuses only on those of greater substance as all those of minor consequence can be addressed in finalising the document.

3.2 SODC suggests modifications to the policy wording of criterion C. of Policy TwA1 and Policy TwA11 if these policies are to be retained. SODC makes valid points on these specific matters. **It is therefore recommended that these policies are amended to reflect SODC's comments.**

3.3 SODC has queried the approach of Policy TwA4 in terms of defining proportionality. The approach adopted by the Parish Council is not arbitrary and aligns itself with the spatial strategy for the district. In particular, Policy H8: Housing in the Smaller Villages allows for a level of growth commensurate to the scale and character of the village, expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census during the plan period. The Parish Council agrees that around 5% of growth is a level of growth commensurate to the scale and character of Tiddington. The 2011 census records 270 household spaces in the parish as a whole, which includes Milton Common, Albury and Draycot. It is therefore reasonable to apportion in the region of over 100 – 150 homes to the village of Tiddington. A 5% increase is therefore around 6 new homes within the plan period. **It is therefore recommended that the supporting text of Policy TwA4 sets out the approach adopted in defining proportionality in more detail.**

3.2 The main observation of OCC is an objection to the inclusion of three local green spaces, LGS2 Village Green, part of LGS3 Tiddington Cricket Club and LGS5 The Railway Line. With respect to LGS2, and part of LGS3, the NPPF requires Local Green Spaces to be 'capable of enduring beyond the plan period'. Highway verges like these could be used as part of future highway/transport schemes without the need to apply for planning permission. They are not normally therefore suitable for Local Green Space designation. **It is therefore recommended that LGS2 and part of LGS3 is removed from Policy TwA3. The Parish Council should be satisfied that it has contacted the landowners of the remaining proposed designations for LGS1, LGS3 – LGS7.**

3.3 For LGS5, OCC has confirmed that it owns the land and that the site already benefits from planning designations, Green Belt and Tree Preservation Orders. There is currently no evidence to suggest that a Local Green Space designation would provide any additional benefit than those already gained from its location within the Green Belt and Tree Preservation Orders on the site. **It is therefore recommended that LGS5 is removed from Policy TwA3. It should be noted that the site remains part of the Network defined at Policy TwA1 as Priority Habitat Deciduous Woodland.**

3.3 OCC also includes a recommendation for a policy on the historic environment. The policy provisions suggested is already reflected in adopted South Oxfordshire Local Plan 2035 Policies ENV6: Historic Environment, ENV7 Listed Buildings, ENV8 Conservation Areas and ENV9 Archaeology and Scheduled Monuments and as such would be duplication to be avoided, as per §16 of the NPPF.

3.4 Fisher German has focused its comments, as representative of the landowner for 46 Ickford Road, on an inconsistent approach in drawing the settlement boundary and encourages the TNP to make housing allocations.

3.5 The methodology adopted for drawing the settlement boundary uses conventions adopted by other local planning authorities that use this development management tool. Essentially, the boundary follows the observed settlement edge formed by the built form which have a clear functional relationship to the settlement. The curtilages of buildings were included as a guiding principle unless the curtilages related more to the character of the countryside than the built form. Domestic gardens on the edge of the settlement which are extensive and not functionally related to the physical built form of the settlement were excluded. It is therefore considered that a consistent approach has been adopted in drawing the settlement boundary with no changes necessary.

3.6 In respect of additional housing allocations, the TNP has been prepared at a time when both a new Joint Local Plan 2041 and the Oxfordshire Local Plan 2050 are in the very early stages of preparation. The focus of the TNP has therefore been to ensure the quality of new development within the Parish is of a high quality and to prepare for potential growth in and around the area through expressing the identity of the existing village community. Once the strategy for these plans become clearer, the Parish Council will consider any resulting opportunities. It is therefore considered that no changes are necessary. In any event, the Parish Council is aware that there remains an opportunity for Rural Exception Sites and First Homes Exception Sites (outside of the Green Belt) to come forward within the parish to meet local housing need and the adopted South Oxfordshire Local Plan 2035 and Policy TwA4 of the TNP contains provisions in respect of these types of development.

#### **4. Conclusions & Recommendations**

4.1 The representations are generally supportive of the TNP and, with some modifications as recommended, it is considered that it can proceed to the Regulation 15 submission stage without further consultations.