

Tiddington with Albury Neighbourhood Plan - publicity period

Response 1

Respondent Details

[REDACTED]	
[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Tiddington with Albury 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.

Dear Sir/Madam

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

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 Tiddington with Albury Neighbourhood Development Plan (NDP) during the pre-submission consultation.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that 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.

Yours faithfully

[REDACTED]

Planning Policy Officer (Neighbourhood Planning)

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 letter/table.

Q5. You can upload supporting evidence here.

- File: 2022-11-07 Reg 16 Response Tiddington with Albury.docx [REDACTED]

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 Tiddington with Albury Neighbourhood Plan:

No, I do not request a public examination

Your details and future contact preferences

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	[REDACTED]
Job title (if relevant)	Planning Policy Officer (Neighbourhood)
Organisation (if relevant)	South Oxfordshire District Council
Organisation representing (if relevant)	-
Address line 1	Abbey House
Address line 2	Abbey Close
Address line 3	-
Postal town	Abingdon
Postcode	OX14 3JE
Telephone number	-
Email address	planning.policy@southandvale.gov.uk

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Policy and Programmes

**HEAD OF SERVICE: HARRY
BARRINGTON-MOUNTFORD**



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

7 November 2022

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

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

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 Tiddington with Albury Neighbourhood Development Plan (NDP) during the pre-submission consultation.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that 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.

Yours faithfully

[REDACTED]

[REDACTED]

Planning Policy Officer (Neighbourhood Planning)

Ref.	Section/Policy	Comment/Recommendation
1.	Page 8 – 1.7	<p>We recommend updating the title of 1.7, so that the text accurately reflects the title of the Government's Bill: The Levelling Up and ReGeneration Bill</p> <p>We also recommend amending the supporting text to provide the most up-to-date information about the Bill, for clarity and because the mentioned date has already passed:</p> <p>The second reading of the Bill is scheduled in the House of Commons for 8 June 2022, and the government has announced that in broad terms, changes to the planning system will begin to take place from 2024, once the Bill has received Royal Assent and the associated regulations and changes to national policy are in place.</p>
2.	Page 17	<p>We recommend amendments to the following sentences to improve clarity and provide the most up-to-date information:</p> <p>A new Joint Local Plan 2041 is in its very early stages of development which will replace the SODCLP once adopted, currently scheduled for October 2024. An Issues Consultation commenced in took place from May-June 2022 and is currently scheduled to run until 23 June 2022. The key issues that the Joint Local Plan is currently thinking about...</p>
3.	Page 18 – para 3.15 to 3.17	<p>These paragraphs refer to the Oxfordshire Plan 2050.</p> <p>We recommend that these paragraphs are deleted as the Oxfordshire Plan 2050 work programme has now ended. Please see the website for details.</p>
4.	Page 24	<p>Our Equality and Inclusivity Officer has highlighted accessibility, i.e., that not everyone can walk or cycle; and for consideration to be given to people with various disabilities/impairments that can only travel by using a car: NPPF paragraph 92 also explains plans should 'achieve healthy, inclusive and safe places'. We therefore recommend that paragraph 5 is amended so that the text has regard to national policy:</p>

		<p><i>5. To encourage healthy lifestyles and reduce reliance on the private car by supporting proposals that enable sustainable, travel, without spoiling the rural nature of The Parish, of new and existing walking and cycle routes. Providing accessible travel options for people with different needs are also encouraged.</i></p>
5.	<p>Page 25</p> <p>POLICY TwA1: NATURE RECOVERY</p>	<p>We recommend moving the policies map to the start of this section, so it is easily accessible to the reader and provides sufficient clarity, as required by the PPG.</p> <p>Our Ecology Officer has recommended amendments to Part C of this policy, to prevent it being overly restrictive. The reasons for this, as explained in the Regulation 14 comments, were that the proposed network covers very extensive areas of land within the Parish and much of this land does not, at present, have any demonstrable biodiversity value other than that inferred by its historic associations. Decisions about which habitats should be protected from development would need to be based on objective evidence obtained from habitat surveys and cannot be inferred from the decision to declare the land as part of a network. A minor amendment is also recommended, to ensure the Policy meets the PPG requirement that plans are ‘positively prepared’:</p> <p>C. Development within the Nature Recovery Network must be supported by evidence that clearly demonstrates it will support SOLP Policies regarding conservation of habitats and protected species. Proposals that will harm the functionality or connectivity of the Network, including the Tiddington Nature Recovery Corridor, will not be supported. Development proposals that will lead to the extension of the Network, including delivery of the Tiddington Nature Recovery Corridor, will be supported, provided they are consistent with all other relevant policies of the development plan.</p>
6.	Page 27 – para 5.7	<p>As set out in our response to the Regulation 14 consultation, text in this paragraph is difficult to read; we recommend it is spaced as per the rest of the document (i.e., no less than single line spacing and Arial 12) for accessibility, legibility and clarity.</p>

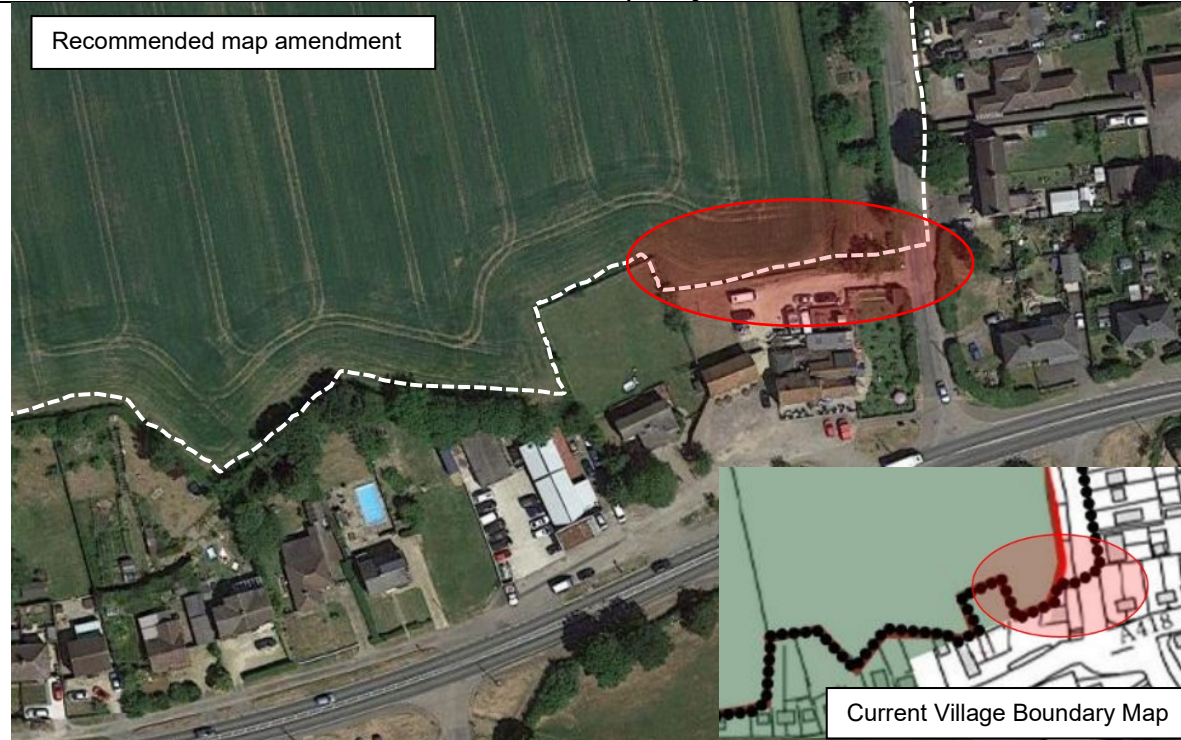
		<p>Our Ecology Officer recommends that reference to the 'draft Oxford Nature Recovery Network' is removed here, because this draft was part of the Oxfordshire Plan 2050 work; legitimised and only provided weight by this. We recommend that this reference is now deleted, as the Oxfordshire Plan 2050 work programme has now ended. Please see the website for details.</p> <p>The Network incorporates a proposed Tiddington Wildlife Corridor between the ancient woodland at Fernhill and the River Thame. This area of land has also been identified as a Recovery Zone in the Draft Oxfordshire Nature Recovery Network prepared by a partnership of local nature conservation organisations, led by Thames Valley Environmental Records Centre, Wild Oxfordshire and The Berks, Bucks and Oxon Wildlife Trust overseen by Oxfordshire's Biodiversity Advisory Group and adopted by the Oxfordshire Environment Board. The parishioners support the retention of the open landscape character in order to maintain links with the open countryside that surrounds The Parish and so preserve and enhance the flora and fauna present.</p>
7.	Page 27-28 – para 5.8	<p>Our Ecology Officer has highlighted that <i>all</i> priority habitats are identified within the Natural Environment and Rural Communities Act (2006) and therefore the removal of the phrase '<u>some</u> of which' in the Neighbourhood Plan is recommended. The habitat protection stems from Paragraph 179(b) of the NPPF, that promotes the 'conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species':</p> <p>5.8 Whilst the Parish does not have any SSSIs or other designated wildlife sites, there are priority habitat areas in the Parish, Table 1, Some of which are covered identified by the Natural Environment and Rural Communities Act (2006) Section 41 (s41).</p>
8.	Page 28 – para 5.10 [and page 61 A2.3]	<p>Page 28 states 'the Parish also supports a considerable area of ancient grassland' and Page 61 states 'the lack of ploughing since long before 1840, with the consequent</p>

		<p>preservation of the Medieval layout means that these pastures qualify as ancient grasslands and have a special ecology with the linear wetter and drier portions’.</p> <p>Our Ecology Officer has highlighted that the Neighbourhood Plan would need to provide the ecological evidence/clarification to support the term ‘ancient grassland’, to explain why ‘ancient grassland’ is ecologically significant. For example, the NPPF does not recognise ‘ancient grassland’ and therefore it does not carry weight in plan-making (whereas, for example, ancient woodland carries significant weight, in NPPF paragraph 180c).</p>
9.	<p>Page 29</p> <p>Table 2 – Page 29</p>	<p>Re-establishing colonies is outside the remit of a Neighbourhood Plan (this is Natural England’s remit), therefore we recommend the encouragement of habitat recreation to replace the sentence regarding newt colonies:</p> <p style="text-align: center;">The section along Ickford Road is part of the Great Crested Newt GCN Conservation Priority Zone. Ponds in Milton Common previously had Great Crested Newts and an aim would be to reestablish this colony encourage habitat re-creation.</p> <p>Our Ecology Officer recommends that this table is renamed as ‘Priority Species’ in Tiddington-with-Albury’ to bring the clarity required by the NPPF, because species are identified, rather than ‘protected’, by the NERC Act (2006).</p>
10.	Page 30 – para 5.13-14	<p>We recommend an additional reference at para 5.13 because the Network map has moved, for clarity:</p> <p style="text-align: center;">5.13 The policy therefore requires that all development proposals that lie within the Nature Recovery Network (shown at Figure 3), or that adjoin it...</p> <p>The PPG sets out that policies should be drafted with sufficient clarity that a decision maker can apply them consistently and with confidence. To ensure this supporting text, referring to policy, has the clarity required by national policy and guidance, we also recommend the following amendments to ensure consistency with the policy wording:</p>

		<p>At the very least, tThe policy requires emphasizes that proposals that will undermine the existing value of the Network will not be supported-be refused permission.</p> <p>In para 5.14, because no reasons/evidence behind why the green infrastructure network 'will become more valuable over time' are explained, we recommend replacing 'will' with 'may', to bring the clarity required by the NPPF.</p> <p>5.14 The Network will may become more valuable over time, and although the majority of these features are physically attached to enable habitat connectivity, some features of the Network are not.</p>
11.	Page 30-1 Table 3	'Fernhill Wood' appears in two rows in this table. We recommend merging the two Fernhill Wood cells into one in the first column to aid understanding that this is one area, for clarity.
12.	Page 32 POLICY TwA2: VILLAGE BOUNDARIES AND INFILL DEVELOPMENT	<p>Our Landscape Officer has raised the following comment regarding Policy TwA2: 'I have some concerns about the inclusion of the Oxford Caravan storage area [at the] western end of village within the village boundary and thus deemed appropriate for development under paragraph C of the above policy. This site extends beyond the natural limits of the village, is located within the Green Belt and is open to the rural approach on the A418. Whilst the stored caravans do have some visual impact, permanent housing in this location would have a greater adverse effect on the visual openness of the Green Belt and on the rural approach to the village'.</p> <p>In order to address these comments and ensure the policy provides the clarity required by national policy and guidance, we recommend the following amendments to part C of the policy:</p> <p>C. Proposals for limited infill development and redevelopment within the village boundaries that lie within the Green Belt will be deemed appropriate development in the Green Belt and will be supported, provided they meet the requirements for appropriate development in the Green Belt set out in National Policy and</p>

provided they accord with the design and development management policies of the Development Plan. Proposals for development outside the village boundaries that lie within the Green Belt will not be supported unless very special circumstances can be demonstrated or that they do not comprise inappropriate development in the Green Belt as set out in national policy.

13. Page 33 – Village Boundary Map
and maps on Page 49, 50, 52



We recommend that a small amendment is made to the Village Boundary Map (and associated maps showing the Village Boundary on pages 49, 50 and 52) to address the area circled in red in the maps above. We have added a white dashed lined to the aerial photo to indicate where the village boundary would sit, following the Neighbourhood Plan's [Regulation 14 Analysis](#) which, in para 3.5, confirmed that the village '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

		<p><i>guiding principle unless the curtilages related more to the character of the countryside than the built form</i>'. In the Village Boundary Map (inset) the boundary around the Fox and Goat and its neighbouring buildings differs to the marked field/fence line visible in the satellite photograph. We recommend that the Village Boundary line is amended to match the white dashed line circled in red, because the missed area in the Village Boundary (e.g. the car park) still appears to meet the criteria described above, i.e. having a '<i>clear functional relationship to the settlement</i>'. This would bring the clarity required by the NPPF and reflect the position 'on the ground'.</p>
14.	Page 35 – 5.21	<p>As Policy TwA3 Local Green Spaces has been amended, the supporting text needs to reflect the policy accurately. We recommend amendments to the number of policies in the supporting text, as three are now listed in Policy TwA3. Additionally, page 74 (the Appendix) explains LGS4 is 'no longer proposed for LGS designation' therefore the supporting text needs to be amended to bring the clarity required by the NPPF:</p> <p style="padding-left: 40px;">5.21 In addition to that area of the village in the Oxford Green Belt, this policy proposes six three important green spaces in and on the edge of the settlements within The Parish, which lies outside of the Green Belt with the exception of LGS4 The Railway Line. These areas are largely privately owned but play an important role in creating the environment of each settlement that is enjoyed by the residents. The Parish Council considers that the inclusion of LGS4 is an expression of local identity as it is important to the local community that it is recognised that the space does have recreational value.</p>
15.	General comment	<p>As set out in our Regulation 14 comments, we recommended that a policy on tenure mix which responds to First Homes is inserted into the plan. This would reflect the most up-to-date position, taking account of tenancy requirements in the Local Plan, which have been amended by the Written Ministerial Statement. We would still recommend the following policy wording is inserted:</p> <p><i>'Taking into account the requirements for affordable housing set out in the development plan, as well as the requirement that at least 25% of all affordable housing units delivered</i></p>

should be First Homes, the affordable housing tenure sought should be in accordance with the table below:

Tenure split, post 28 June 2021

<i>Tenure</i>	<i>South Oxfordshire</i>
<i>First Homes</i>	<i>25%</i>
<i>Social Rent</i>	<i>35%</i>
<i>Affordable Rent</i>	<i>25%</i>
<i>Other routes to affordable home ownership</i>	<i>15%</i>

16.

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POLICY TwA4
FIRST HOMES

The Written Ministerial Statement (WMS) made on 24 May 2021 on Affordable Homes introduced First Homes Exception sites. It states: *‘Local authorities should support the development of these First Homes exception sites, suitable for first-time buyers, unless the need for such homes is already being met within the local authority’s area. Local connection criteria may be set where these can be supported by evidence of necessity and will not compromise site viability. First Homes exception sites should be on land which is not already allocated for housing and should:*

a) comprise First Homes (as defined in this Written Ministerial Statement)

b) be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in the National Planning Policy Framework, and comply with any local design policies and standards.’

We understand the purpose of Policy TwA4 is to guide the element of proportionality required by point b) above. However, in our Regulation 14 comments we suggested that Policy TwA4 appeared to impose arbitrary restrictions with points i,ii and iii, instead of setting out an approach and what evidence may be necessary to assess the proportionality of a scheme. We note that justifications behind these calculations have now been included within the supporting text, drawing a parallel with Policy H10 of the

		<p>SOLP, which is aligned with NPPF paragraph 72, defining proportionality in its footnote 35, stating: 'entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement'. However, the SOLP was adopted in December 2020 and Policy H10 is therefore focused on Exception Sites and Entry Level Housing Schemes.</p> <p>There has been a change in the Government's approach – national policy was more prescriptive in terms of understanding proportionality in relation to Entry Level Housing Schemes – national planning policy included fixed thresholds such as the ones in Policy H10 of the SOLP. Planning Practice Guidance on First Homes (Paragraph: 026 Reference ID: 70-026-20210524) departs from fixed thresholds and encourages neighbourhood planning groups 'to set policies which specify their approach to determining the proportionality of First Homes exception site proposals, and the sorts of evidence that they might need in order to properly assess this'.</p> <p>Guidance on First Homes did not carry through the restrictions for starter homes and therefore the evidence-led aspect, sitting behind 'proportionality', is the key. We therefore recommend not stating a specific number of homes, rather providing a percentage; and emphasizing the need for evidence, to ensure that sites coming forward meet local needs.</p> <p>Additionally, the supporting text in 5.26 refers to Policy H8 - Housing in the Smaller Villages. Though this policy is to help clarify Neighbourhood Plan ambitions/growth to meet Local Need, it is designed to apply to market housing, not First Homes or exception sites. However, it states 'those Neighbourhood Development Plans will need to demonstrate that the level of growth they are planning for is commensurate to the scale and character of their village, and this is expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census (minus any completions since 1 April 2011).' Consequently, it does give an indication of proportionality and we therefore support the use of this figure within the policy, together with clarification of paragraphs 5.25-26:</p>
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		<p>We recommend amendments to the policy and supporting text as follows, to bring the clarity required by the NPPF and ensure policies are in general conformity with the strategic policies contained in the development plan:</p> <p><i>Proposals for a First Homes Exception Site will be deemed proportionate supported if:</i></p> <p><i>i. no other proposal for a First Homes Exception Site has been approved and implemented in the plan period;</i></p> <p><i>ii. the gross site area is no more than 0.2Ha and has a main road frontage;</i></p> <p><i>iii. the scheme is for no more than 6 homes supported by robust evidence of demonstrable local needs and does not exceed 5% of the size of the existing settlement</i></p> <p><i>iv. ii. at least one of the site boundaries entirely adjoins the settlement boundary defined by Policy TwA2; and</i></p> <p><i>v. iii. it can be demonstrated that the scheme will:</i></p> <p><i>a. avoid areas at risk of flooding; and</i></p> <p><i>b. not cause unacceptable harm to identified Important Views or harm to any designated heritage assets.</i></p> <p>5.25 Planning Practice Guidance allows for First Homes Exception Sites to come forward on unallocated land outside of a development plan but only within those parts of the Parish which do not lie in the Oxford Green Belt. This has been recognised by SODC in the recent publication of a First Homes Guidance Note October 2021. For those Green Belt areas only Rural Exception Sites can come forward. A First Home is defined as discounted market housing for first time buyers that must be discounted by a minimum of 30% against the market value in</p>
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		<p>perpetuity and its first sale must be at a price no higher than £250,000 after the discount has been applied. The policy therefore sets out the criteria by which a First Homes Exception Site proposal should be determined as provided for by the Guidance.</p> <p>5.26 In essence the policy reflects the spirit and intention of the SODCLP Policy H10 which also covers Entry Level Housing Schemes which the First Homes product will effectively replace, and the spatial strategy of the District, notably Policy H8 which 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 considers that approximately 5% of growth is a level of growth commensurate to the scale and character of Tiddington as a small village with limited services. 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 100 – 150 homes to the main village settlement of Tiddington. A 5% increase is therefore 6 new homes within the plan period. The information demonstrates the Parish Council's initial approach in defining 'proportionate in size' as provided for by Planning Practice Guidance, which can be supplemented by further future evidence as required.</p>
17.	P38 – para 5.32	<p>Policy TwA2 is positively worded, explaining that 'proposals that recognise the need for smaller dwellings and comprise of two- or three- bedroom homes will be particularly supported'. In contrast, paragraph 5.32's supporting text appears more specific/stronger than the policy. We recommend, therefore, that this is amended to reflect the policy text, to bring clarity:</p> <p>5.32 The policy therefore requires that supports new infill homes provided for by Policy TwA2, and Rural Exception Sites provided for by SODCLP Policy H10, particularly supporting those comprising comprising mainly 2- and 3- bedroom homes.</p>


18.

Page 39

**POLICY TwA6
PROTECTION OF
KEY VIEWS**

As set out in our response to the Regulation 14 consultation, identified key views are shown on the Policy Map, and are noted in the policy to be from public vantage points. However, View 10 did not appear to be from the public footpath. This view, as linked to the policy, currently lacks clarity and we recommend that the View 10 arrow is adjusted slightly. The orange arrows, added by the council below, highlight the direction that the View 10 photograph is actually taken from, i.e., looking towards the north-east farm buildings, which differs from the current position of the green View 10 arrows. We recommend the View 10 green arrow below is moved to the direction of the orange arrow, for clarity.



		 <p data-bbox="1473 220 1957 507">V10 Grid Reference: 65062 05447. Elevation: 65 metres. Looking north east from behind Brookside Close across farmland. The Parish has a network of footpaths leading as far as neighbouring villages.</p>
19.	Page 41 TwA10 TRAFFIC MANAGEMENT AND TRANSPORT	<p data-bbox="712 791 1986 970">As set out in our response to the Regulation 14 consultation, we support the objectives of this policy, however it should be noted that development proposals are required to mitigate their own impact. We recommend a minor addition to this policy to clarify that and have further regard to national policy (NPPF paragraphs 104d and 110d) regarding mitigating development impacts:</p> <p data-bbox="808 1011 1986 1230">TwA10 TRAFFIC MANAGEMENT AND TRANSPORT: Development proposals will be supported, provided that, where appropriate to their location, they deliver or make financial contributions towards the mitigation of traffic volumes and speed through the Parish related to their development; they do not introduce urbanising highways infrastructure into the village lanes and they are in accordance with the other relevant policies of the Development Plan.</p>
20.	Page 43	<p data-bbox="712 1275 1986 1342">We recommend a minor rewording of para 5.59 for clarity, because it is currently inferring a point of view, without supporting evidence:</p>

		5.59 The proposal for Waterstock Golf Course and the fields to Ickford Road as a major goods logistics hub and housing development, on the western side of the village has come after the NP Questionnaire (NPQ) was circulated, but the concept would not be supported by either the responses to the questionnaire or the Parish Council.
21.	Page 44 POLICY TwA11 DARK SKIES	<p>This policy has been amended since the Regulation 14 consultation. The NPPG sets out that policies should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence. As worded, this policy is overly restrictive; therefore to ensure it provides clarity and positive planning required by national policy and guidance, we recommend minor amendments that also take into account the recent comments regarding Dark Skies policies in the Shiplake Neighbourhood Plan examiner's report:</p> <p>POLICY TwA11 DARK SKIES: Proposals for development will only be supported where it is demonstrated that, if external lighting is required, light pollution has been reduced wherever possible, or and as a minimum, kept to current levels through: all development with external lighting should meet or exceed Institute of Lighting Professionals (ILP) guidance for the environmental zone in which the development is set to take place, or any equivalent replacement/updated guidance for lighting within environmental zones.</p> <p>Development proposals which include lighting will be encouraged to:</p> <ul style="list-style-type: none"> (i) Maintaining or enhanceing the measured pre-development dark sky quality of the surrounding area; (ii) Meeting or exceeding the current guidelines established for rural areas by the Institute of Lighting Professionals (ILP); and (iii) Employing energy-efficient forms of lighting that also reduce light scatter/spillage.
22.	Page 45 – Para 5.66	This is a newly inserted paragraph since the Regulation 14 consultation. We recommend the following amendments to ensure the supporting text is not unnecessarily restrictive (for example, there is no specific guidance/timings in SODC Local Plan 2035 or NPPF regarding curfew hours and the PPG explains 'Planning conditions could potentially require this where necessary'):

		<p>5.66 To help achieve these objectives the policy is designed to guide decisions on new and replacement lighting and help private householders and businesses make the right informed lighting choices. For all proposed developments, factors that will be considered when deciding the appropriateness of artificial lighting include the location, the hours of operation, the quantity of lights proposed, brightness and control, and direction of the beam. Appropriate Examples of mitigation and/or control measures that could be secured by planning conditions to prevent unnecessary light pollution include:</p> <ol style="list-style-type: none"> a. The use of 'curfew hours' (12pm – 6am) through automatic timers, and night-time dimming; b. The use of proximity infrared motion sensors, timers or any additional shielding or coving, including angling the front surface of lights to below the horizontal; c. The use of different surface types to reduce the amount of reflectivity; d. Screening or shielding to reduce the impact of reflectivity; and e. Reflect the latest best practice guidance from the Institution of Lighting Professionals (ILP) on light types in terms of lumens, wattage, angle, height, colour, warmth, etc.
23.	Page 47	<p>We recommend minor amendments to point iv. for clarity, because as written it appears to promote, rather than mitigate, destruction of road verges:</p> <ol style="list-style-type: none"> iv. Introduce solutions to mitigate the destruction of road verges, provide proper appropriate road verge maintenance and avoid the introduction of urbanising highways infrastructure. <p>We recommend an amendment to ensure the plan is fully updated, due to the councils' Joint Design Guide SPD now having been adopted, in June 2022:</p> <p>6.5 The Vale of White Horse and South Oxfordshire District Councils adopted their are currently preparing a Joint Design Guide Supplementary Planning Document (SPD) in June 2022. to replace the adopted South Oxfordshire Design Guide SPD 2015. A draft</p>

		<p>Guide will be produced for consultation in 2021. The Parish Council has therefore decided that any neighbourhood design coding or identification of local heritage assets will would not be undertaken whilst this plan was emerging and will once it has had a chance to engage with the District Councils on the production of the new Design Guide SPD to avoid any duplication of work. Any outstanding design matters will then be considered as part of a review of the future modification to the Neighbourhood Plan.</p>
24.	Page 59 Fig. A2.1	We recommend an improvement of image quality to Fig. A2.1 to bring the clarity required by the NPPF.
25.	Page 66	<p>NPPF paragraph 92 explains plans should ‘achieve healthy, inclusive and safe places’. We recommend that this paragraph is amended so that the text has regard to national policy:</p> <p style="padding-left: 40px;">Consequently, it needs to be delivered at all spatial scales from subregional to local neighbourhood levels, accommodating both accessible natural green spaces including for people with different needs within local communities and often much larger sites in the urban fringe and wider countryside.</p>
26.	Page 72	Para 3 – we recommend expansion to the table cell as the sentence has been cut off, for clarity.
27.	Page 77 – A3.6	<p>We recommend rewording A3.6 to bring the clarity required by the NPPF, as A3.6 currently suggests several options are available, whereas only one additional option is now exemplified in this appendix:</p> <p>A further Several options are is available to the Parish Council in order to protect open spaces:</p>
28.	Page 97 – A7.2	Our Conservation Officer has highlighted that ‘A7.2 Buildings of Note’ can be considered a list of local non-designated heritage assets (NDHA’s) and identified as such. This would grant them a greater degree of protection as this status is a material planning consideration and provide the clarity required by the PPG for decision-making.

29.	General comments – presentational matters	<p>Map legibility - The policies maps are clear and easy to interpret.</p> <p>Document accessibility - We have used Adobe Acrobat Pro’s Accessibility Check and Accessibility Report features to review the Neighbourhood Plan document, which has passed almost all of the tests. Adding alternative text to images and figures would make the NDP document more accessible. Alternative text (also known as ‘alt text’) describes the appearance and function of an image. Screen readers will read aloud alt text to the user. This allows people who would not otherwise be able to see the image, such as blind and visually impaired people, to hear the description of it. Alt text should be a reasonable replacement for an image, which is particularly important if an image is a map, flowchart or infographic.</p> <p>Adding alt text using Microsoft Word is a straightforward process. Images should be inserted, right clicked and then “Edit alt text...” selected, which will make a panel appear on the left hand of the screen. The text box can be used to describe images.</p> <p>For clarity, we recommend that the accessibility of the document is improved through the addition of alt text. If the examiner is minded to propose such modification, the district council can assist with this matter.</p>
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Typographical / Presentational Amendments:

Ref.	Section/Policy	Comment/Recommendation
1.	Page 13	<p>We recommend the addition of a comma for clarity:</p> <p>Three A class roads, the A40, A329 and A418 traverse The Parish, all of which connect with the M40</p>
2.	Page 17 – para 3.9	<p>We recommend a minor rewording of this paragraph, for clarity of meaning:</p> <p>It requires that new waste management facilities are located and managed to minimise the use if of unsuitable roads</p>

3.	Page 18 – para 3.10	We recommend a minor rewording of this paragraph, to enhance understanding: The plan's eEmphasis of is on the importance of preserving the pastures on the northern side of The Parish and the habitats they support.
4.	Page 22 – para G	We recommend that the source/reference for this quotation is added, for clarity.
5.	Page 25 - Policy TwA1: Nature Recovery	We recommend the removal of surplus full stop in paragraph c of this policy, for clarity.
6.	Page 30-1 Table 3	We suggest an amendment to a minor typographical error in this table: ameadows
7.	Page 40	We recommend a minor rewording of para 5.40 for clarity: 5.40 The policy supplements and refines existing development plan policies on community, open space, sport or recreation facilities to which the policies should apply and seeks by seeking to ensure that the long-term potential value of land in community use is not lost without good reason.
8.	Page 60	We suggest a minor typographical error to be amended: Riever Thame
9.	Page 89 to 92 Figure A6.1 to A6.4	To ensure the document is accessible to users with different needs, we recommend that traffic figures stated in the text below these graphs are added to the graphs themselves, to enhance reader understanding.
10.	Page 95	We recommend the following minor typographical amendments to this page for consistency: Ppost-Medieval [...] The nineteenth century industrial archaeology of The Parish is represented by the course of the disused railway line that ran from Oxford via Cowley and Wheatley to Thame and then to join the main line at Prince's Risborough. Sections of this are used by residents and are either public footpaths or permissive paths.
11.	General Comment	Our Equality and Inclusivity Officer set out in our response to the Regulation 14 consultation that there is quite a lot of bold italic font throughout the document (for

		example, in policy text); bold font is suitable in plain text, but not italics as makes reading difficult for people with visual impairments. We recommend transferral of italic text to plain.
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Response 2

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Tiddington with Albury 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>Response received via email from the Marine Management Organisation (MMO). Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-09-08 MMO.pdf - [REDACTED]

Your details and future contact preferences

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	Marine Management Organisation (MMO)
Job title (if relevant)	-
Organisation (if relevant)	Marine Management Organisation (MMO)
Organisation representing (if relevant)	-
Address line 1	Lancaster House
Address line 2	Hampshire Court
Address line 3	Newcastle upon Tyne
Postal town	-
Postcode	NE4 7YH
Telephone number	-
Email address	Consultations.MMO@marinemanagement.org.uk

From: SM-MMO-Consultations (MMO)
<Consultations.MMO@marinemanagement.org.uk>
Sent: 08 September 2022 10:17
To: Planning Policy S&V
Subject: Consultation response- PLEASE READ

****EXTERNAL****

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,
The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.

- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

This message has been sent using TLS 1.2

The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

This email originates from outside of the council.

Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.

If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

Response 3

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Tiddington with Albury 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>Response received via email from SSE. Please see below:</p> <p>"Thank you for your message below, together with the link to the 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>

Your details and future contact preferences

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	██████████
Job title (if relevant)	Network Connections Planning Engineer
Organisation (if relevant)	Scottish and Southern Electricity Networks
Organisation representing (if relevant)	-
Address line 1	1 Woodstock Road
Address line 2	Yarnton
Address line 3	-
Postal town	Kidlington
Postcode	OX5 1NY
Telephone number	-
Email address	██████████@sse.com

Response 4

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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<p>Response received via email from Historic England. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 22-09-13 Historic England.pdf - [REDACTED]

Your details and future contact preferences

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	██████████
Job title (if relevant)	Business Officer (South East Region)
Organisation (if relevant)	Historic England
Organisation representing (if relevant)	-
Address line 1	Canon Bridge House
Address line 2	25 Dowgate Hill
Address line 3	-
Postal town	London
Postcode	EC4R 2YA
Telephone number	-
Email address	e-seast@HistoricEngland.org.uk



Historic England

To Whom it may concern

Our ref: PL00789323

13/09/22

Dear Sir/Madam,

Ref: Tiddington-with-Albury Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on e-seast@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me if you have any queries.

Yours sincerely,

[Redacted signature]

Business Officer

E-mail: [Redacted]@historicengland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Response 5

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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Response received via email from The Coal Authority. Please see below:

"Thank you for your notification below regarding Tiddington with Albury Neighbourhood Plan Consultation.

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, , South Oxfordshire District Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary."

Your details and future contact preferences

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	██████████
Job title (if relevant)	Planning & Development Manager
Organisation (if relevant)	The Coal Authority
Organisation representing (if relevant)	-
Address line 1	200 Lichfield Lane
Address line 2	-
Address line 3	-
Postal town	-
Postcode	NG18 4RG
Telephone number	-
Email address	TheCoalAuthority-Planning@coal.gov.uk

Response 6

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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<p>Response received via email from Sport England. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 22-10-03 Sports England.pdf [REDACTED]

Your details and future contact preferences

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	Planning Administration Team
Job title (if relevant)	-
Organisation (if relevant)	Sport England
Organisation representing (if relevant)	-
Address line 1	Sport Par
Address line 2	3 Oakwood Drive
Address line 3	-
Postal town	Loughborough
Postcode	LE11 3QF
Telephone number	-
Email address	Planning.south@sportengland.org

Whiteley, Rosalynn

From: Planning South <Planning.South@sportengland.org>
Sent: 03 October 2022 11:08
To: Planning Policy S&V
Subject: Re: Tiddington with Albury Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

****EXTERNAL****

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the

current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team
Planning.south@sportengland.org

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

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Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.

If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

Response 7

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Tiddington with Albury 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>Response received via email from Tetsworth Parish Council. Please see the below:</p> <p>"At its regular meeting held last week, councillors agreed that Tetsworth PC has no comment to make in respect of the Tiddington with Albury draft Neighbourhood Plan at this time."</p>

Your details and future contact preferences

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	██████████
Job title (if relevant)	Clerk/RFO
Organisation (if relevant)	Tetsworth Parish Council
Organisation representing (if relevant)	-
Address line 1	-
Address line 2	-
Address line 3	-
Postal town	-
Postcode	-
Telephone number	-
Email address	clerk@tetsworthparishcouncil.co.uk

Response 8

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Tiddington with Albury 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>Response received via email from National Highways. Please see attachments.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">• File: 2022-10-28 NH.pdf [REDACTED]• File: 2022-10-28 NH Attachment.pur [REDACTED]

Your details and future contact preferences

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	██████████
Job title (if relevant)	Assistant Spatial Planner (Area 3)
Organisation (if relevant)	National Highways
Organisation representing (if relevant)	-
Address line 1	Bridge House
Address line 2	Walnut Tree Close
Address line 3	-
Postal town	Guildford
Postcode	GU1 4LZ
Telephone number	-
Email address	planningse@nationalhighways.co.uk

From: [REDACTED]@nationalhighways.co.uk>
Sent: 28 October 2022 18:55
To: Planning Policy S&V
Cc: Planning SE; Blake, Patrick; Spatial Planning
Subject: RESPONSE@2022 10 28: #18091 Close RE: 22424135 -Tiddington with Albury draft neighbourhood plan
Attachments: FORMAL RESPONSE: #15990 : 22185321 - Planning Issues/MS (General Business) NHHC:00662001209 Tiddington with Albury Pre-Submission Plan
Follow Up Flag: Follow up
Flag Status: Flagged

****EXTERNAL****

Dear Sir or Madam,

Thank you for your e-mail dated 4 October 2022, which was sent to National Highways Information Centre, consulting us on the above Neighbourhood plan. Please note that we have already responded to the consultation on Tiddington and Albury Draft Neighbourhood Plan Regulation 14 – see attached.

Please send any future correspondence and consultation in relation the this neighbourhood plan to our team's inbox at: planningse@nationalhighways.co.uk

Regards

[REDACTED]
Assistant Spatial Planner (Area 3)

National Highways | Bridge House | Walnut Tree Close | Guildford GU1 4LZ

Tel: +44 (0) 300 470 1118 **Mobile:** 0787 204 6392

Web: <https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

Whiteley, Rosalynn

From: [REDACTED]@nationalhighways.co.uk>
Sent: 23 February 2022 14:56
To: [REDACTED]
Cc: Planning SE; [REDACTED]
Subject: FORMAL RESPONSE: #15990 : 22185321 - Planning Issues/MS (General Business)
NHHC:00662001209 Tiddington with Albury Pre-Submission Plan

FAO: Tiddington Parish Council Clerk

Our Ref: Tracker ID: #15990

RE: Tiddington-with-Albury NEIGHBOURHOOD PLAN 2016-2035 Pre-Submission Plan

Thank you for inviting National Highways to comment on the above Consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M40 motorway.

We have reviewed the above consultation and have 'No Comments'. Please send any future correspondence/consultation in relation to the Neighbourhood Plan to our team's inbox at: planningse@nationalhighways.co.uk

Regards

[REDACTED]
Assistant Spatial Planner (Area 3)

National Highways | Bridge House | Walnut Tree Close | Guildford GU1 4LZ

Tel: +44 (0) 300 470 1118 **Mobile:** 0787 204 6392

Web: <https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

Response 9

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Agent

Your comments

<p>Q2. You can provide your comments on the Tiddington with Albury 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>Response received via email from Fisher German on behalf of [REDACTED]. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 22-11-03 Fisher German.pdf [REDACTED]

Your details and future contact preferences

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	[REDACTED]
Job title (if relevant)	Partner
Organisation (if relevant)	Fisher German
Organisation representing (if relevant)	[REDACTED]
Address line 1	The Estates Office
Address line 2	Norman Court
Address line 3	Ivanhoe Business Park
Postal town	Ashby de la Zouch
Postcode	LE65 2UZ
Telephone number	-
Email address	[REDACTED]@fishergerman.co.uk

[REDACTED]

[REDACTED]

Our Ref: 132796
Date: 3 November 2022

Planning Policy Team
South Oxfordshire District Council
135 Eastern Avenue
Milton
Abingdon
OX14 4SB

FISHER GERMAN LLP
The Estates Office
Norman court,
Ashby-de-la-Zouch
Leicestershire
LE65 2UZ

t. 01530 412821
fishergerman.co.uk

Dear Sir / Madam,

Response to Regulation 16 'Submission' version of the emerging Tiddington with Albury Neighbourhood Plan

On behalf of Fisher German's client, [REDACTED], I write in response to the Regulation 16 (Submission Version) consultation being held for the emerging Tiddington with Albury Neighbourhood Plan (TwANP). My clients own the site known as 46 Ickford Road, Tiddington, OX9 2LU (**Appendix 1**), which comprises 1 no. dwelling and associated garden.

A response was provided at the Regulation 14 'Pre-Submission' stage. Whilst some matters raised at that stage has resulted in amendments to the Regulation 16 Plan, other matters remain as previously drafted. Additional concerns are raised in this consultation outlined in this letter.

The preparation of the TwANP sits under adopted strategic development plan policies for South Oxfordshire District Council as set out within the Local Plan 2035 (adopted 10th December 2020). General conformity with these strategic policies is one of the basic conditions which must be met for a neighbourhood development plan (NDP) to proceed to referendum.

Legislative Requirements – The Basic Conditions

Paragraph: 065, Reference ID: 41-065-20140306 of the National Planning Practice Guidance (PPG) sets out the basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum.

Before a Neighbourhood Development Plan can be put to referendum and be made, each of the basic conditions set out within Paragraph 065 Reference ID 41-065-20140306 must be met. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004.

The basic conditions are as follows:

"(2) A draft order meets the basic conditions if –

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*
- (b) having special regard to the desirability of preserving any listed buildings or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.*
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
- (d) the making of the order contributes to the achievement of sustainable development,*
- (e) the making of the order 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),*

- (f) *the making of the order does not breach, and is otherwise compatible with, EU obligations [as incorporated into UK law], and*
- (g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

Future Housing

The draft TwANP is designed to provide a vision for Tiddington and Albury to 2035 and needs to set out clear policies and allocations to guide and shape the Parish and the community over the plan period.

Policy H8 of the South Oxfordshire District Local Plan 2035 states:

- 1. The Council will support development within the Smaller Villages in accordance with Policy H16. Where a Parish Council wishes to prepare a Neighbourhood Development Plan and make housing allocations within it to support further growth, the Council will support this.**
- 2. Those Neighbourhood Development Plans will need to demonstrate that the level of growth they are planning for is commensurate to the scale and character of their village, and this is expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census (minus any completions since 1 April 2011).**

Whilst Smaller Villages have the choice whether to allocate housing through their Neighbourhood Plans, there is clear support for this by Policy H8. The Parish should proactively allocate new housing beyond just infill and redevelopment of brownfield sites. Looking at the proposed village boundary, there is limited opportunity for infill development making it unlikely that any further housing will be successfully delivered in the village.

At paragraph 2.11 the draft TwANP states "*Despite its growth, The Parish has no facilities having lost its school, shop, post office, and railway station and has no medical or dental services.*"

It is important that the Parish recognises that some additional development commensurate to the scale of the village could help rejuvenate some of the lost facilities and services identified. Larger housing sites that are not mainly 1 or 2 dwellings could deliver facilities and services either on site (where it is viable) or through CIL capital receipts. Housing development brings investment to a village which can benefit the whole community.

The draft TwANP does not propose any housing allocations and simply states at paragraph 3.6 that "*In respect of the TNP, the District Council has confirmed that the 'indicative housing figure' (as per 2021 NPPF p.66) for the Parish is zero*" (Our emphasis). The evidence claiming this is not readily available. We disagree with this approach and suggest that growth of 10% should be planned for.

The draft TwANP outlines at paragraph 5.26 that the 2011 census records 270 household spaces in the parish as a whole, which includes Milton Common, Albury and Draycot, and that it is reasonable to apportion in the region of 100 – 150 homes to the main village settlement of Tiddington. It continues by adding that a 5% increase is therefore 6 new homes within the plan period. It is then claimed at paragraph 5(g) on page 22 that "*This 5% goal by 2035 has already been achieved*".

A number of concerns are raised in this regard. Firstly, the number of dwellings in Tiddington has been estimated to between 100-150. Caution should be applied in this regard as Tiddington is by far the largest of the four villages within the Parish boundary – and is perhaps closer to 200 dwellings.

Secondly, the draft TwANP claims that 5% of 100-150 homes is 6 homes. Even at 5%, this would equate to 5 dwelling minimum, increasing to 7.5 homes at the higher end. Using the more realistic 200 homes figure for the village, 5% would equate to 10 homes, whilst the more appropriate 10% growth rate would equate to a 20 dwelling requirement. Having reviewed the planning history (**Appendix 2**), just 10 dwellings have been consented in the main village of Tiddington. This is 10 homes short of the 10% growth.

The garden of 46 Ickford Road would be able to meet a portion of additional need by delivering around 4-6 houses, subject to further investigation and feasibility studies. This increase would help to meet the 10% increase from the 2011 Census. Pre-empting this additional need and planning proactively will mean that the longevity of housing growth planned for in the Parish would be more likely to fit any growth identified or encouraged through the emerging Joint Local Plan. To allocate no housing at all to at least the year 2035 will create an acute housing shortage for those who are currently residing in the village as children and teenagers who may wish to continue living in the village as adults.

Draft Policy TwA1 - Nature Recovery

The Draft TwANP sets out a number of key objectives including to protect and enhance the quality, character and local distinctiveness of the historically and ecologically important natural landscape and environment, through projects such as the Tiddington Nature Recovery Corridor; and to minimise the impact of any development on the surrounding countryside, landscape and ecosystems. This objective manifests itself into Draft Policy TwA1 – Nature Recovery. However, there is inconsistent wording in relation to this throughout the Draft TwANP. Clarity and revisions are therefore sought in this regard.

Firstly, criterion A of the draft policy states that:

*“A. The Parish contains a variety of green and blue infrastructure that provides an environmental support system for communities and wildlife. **The Neighbourhood Plan designates this Network, as shown on the Policies Map, for the purpose of promoting nature recovery, sustainable movement and for mitigating climate change. The Network comprises Local Green Spaces, footpaths, woodland, trees, hedgerows, ponds, and land of biodiversity value.**” (Our emphasis)*

The Policies Map on Page 49 makes no reference to Nature Recovery or a Network.

It is assumed that the reader should instead be directed to the Nature Recovery Network Plan on Page 26 and duplicated on Page 52. A correction is thus required.

Further clarity is sought in relation to *“land of biodiversity value”*. As no definition is offered, should the reader assume that all land shown on the Nature Recovery Network Plan is ‘land of biodiversity value’, or is this perhaps relating to the designation: ‘Opportunity Tiddington Wildlife Corridor’?

Similarly, criterion C of the draft policy states:

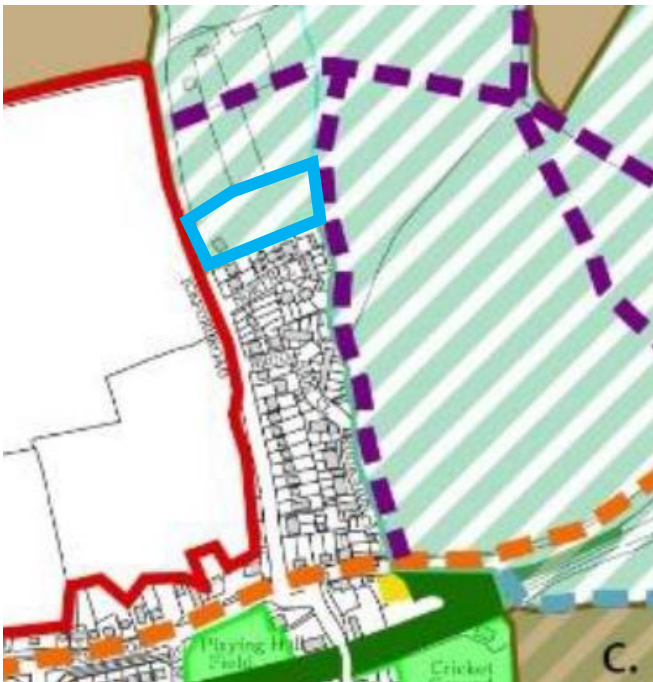
*“C. Proposals that will harm the functionality or connectivity of the Network, including the **Tiddington Nature Recovery Corridor**, will not be supported. Development proposals that will lead to the extension of the Network, including delivery of the Tiddington Nature Recovery Corridor, will be supported, provided they are consistent with all other relevant policies of the development plan.” (Our emphasis)*

Further clarity is sought in relation to *“Tiddington Nature Recovery Corridor”*. As no definition is offered, should the reader assume that all land shown on the Nature Recovery Network Plan is ‘Tiddington Nature Recovery Corridor’, or is this perhaps relating to the designation: ‘Opportunity Tiddington Wildlife Corridor’?

The draft TwANP requires revisions to clarify these points. Such clarity is important as the draft policy seeks to ensure that development proposals within the Network (Criterion B) are required to have full regard to maintaining and improving the functionality of the Network. As such it should be expressly obvious:

- 1 what land is within the 'Network';
- 2 what 'land is of biodiversity value' is;
- 3 what land is within the 'Tiddington Nature Recovery Corridor';
- 4 what policies are applicable for the land identified as 'Opportunity Tiddington Wildlife Corridor' on the Network Plan.

Irrespective of the above, revisions are sought to the land identified on the Nature Recovery Network Plan as 'Opportunity Tiddington Wildlife Corridor'. Whilst we do not object in principle to the wider designation, it currently extends to the private garden land of 46 Ickford Road, Tiddington, as well as the dwelling itself which lies within the village boundary (land edged blue in the Network Plan extract below). No other land within the village boundary has been proposed for inclusion. There is no evidence to suggest that this land is of biodiversity value or should be included within this designation. This land is a private dwelling house and private garden, and should be excluded from any wildlife corridor, network or otherwise revised wording.



Nature Recovery Network Plan Extract

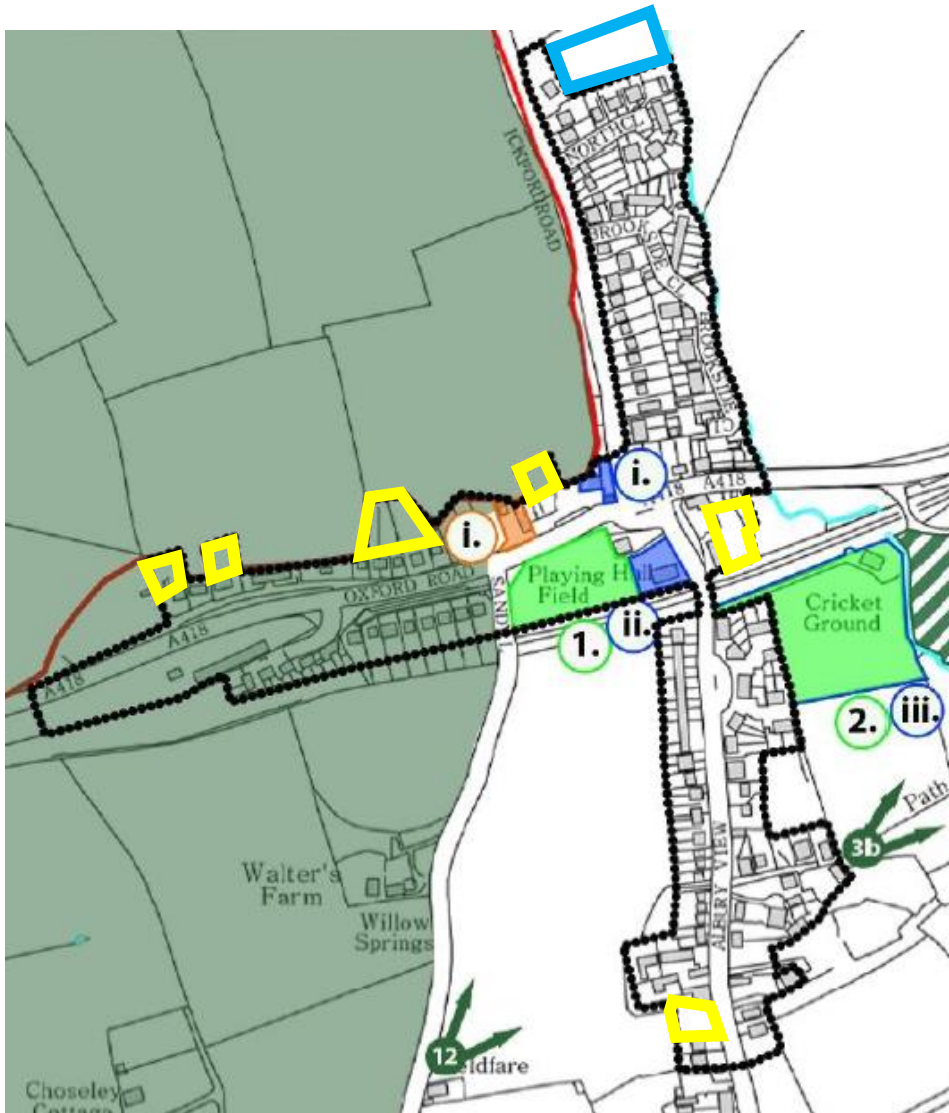
Draft Policy TwA2 – Village Boundaries

The draft village boundary includes the dwelling of 46 Ickford Road, Tiddington, but excludes it's associated garden.

Curtilages are very often included within a settlement boundary in recognition of the combined status of properties and their curtilage as a single planning unit. A curtilage is usually classified as an area of land immediately beside or around a building which is closely associated with and serves the purposes of that building in some necessary or useful way. For dwellinghouses the curtilage is usually the garden and is often, but not necessarily always, marked-off or enclosed. The garden of 46 Ickford Road has clear and obvious site boundaries, enclosed by hedgerows and trees.

The approach taken to drawing the proposed village boundary is inconsistent as some properties with large gardens have had their full curtilage included. The extract of the proposed policies map below highlights in blue the area of 46 Ickford Road that should be included in the village boundary, and highlights in yellow where the whole gardens of similar properties have been included in the boundary.

There is no evidence to suggest that the outlined area of 46 Ickford Road should be excluded when other properties include the whole of the garden. Accordingly, the village boundary should be amended to include the full garden of 46 Ickford Road to be consistent with the application of the methodology elsewhere in the settlement.



Policies Map Extract

Proposed Changes to TwANP

Changes required – we recommend that the TwANP has the following amendments.

- The draft TwANP should allocate land to allow for a 10% growth in the village based on 2011 census data. This equates to 20 homes.
- The garden of 46 Ickford Road should be allocated for up to 6 dwellings. The draft TwANP fails to appropriately guide future development beyond what has already been permitted and leaves a policy vacuum as to the location and scale of development.
- Policy TwA1 should be amended to provide clarification on what elements within the Parish are Nature Recovery/Network/Corridors. The Network Plan should also be amended to exclude 46 Ickford Road and its garden.
- Policy TwA2 and the policies map should be amended, and the village boundary redrawn to incorporate 46 Ickford Road and its curtilage.

Thank you for the opportunity to respond to this consultation, and please do get in touch if the Parish would like to discuss this site further.

We would be grateful if we could be kept updated on the future stages in the making of the TwANP.

Yours sincerely

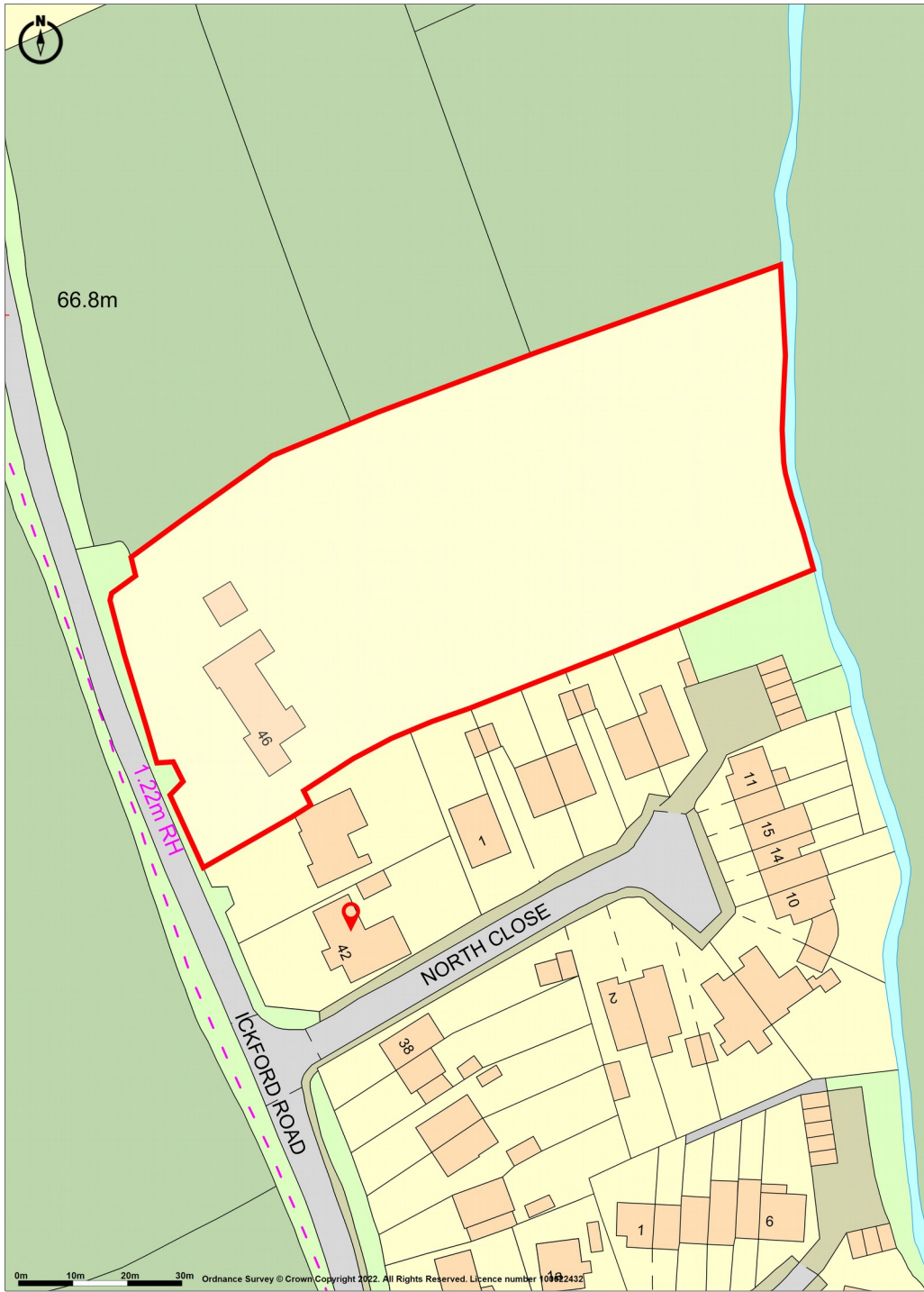
[Redacted signature]
[Redacted name]
For and on behalf of Fisher German LLP

Email: [Redacted]@fishergerman.co.uk

Direct Dial: [Redacted]

Encs: as set out above

Appendix 1 – Site Location Plan



Appendix 2 – Permitted Additional Dwellings since January 2011 (Tiddington Village)

Application Reference	Site Location	Date permitted	No. of Dwellings
P15/S0917/FUL	Land adjacent to Chestnut Cottage Albury View Tiddington OX9 2LQ	4th June 2015	2
P16/S3521/FUL	Embankment House Albury View Tiddington OX9 2FJ	4 th January 2017	1
P17/S3359/O	Hartgrove Oxford Road Tiddington OX9 2LH	22nd December 2017	2 (net of 1 counted as there was an existing unit on site).
P18/S0303/FUL	Manor Farm Albury View Tiddington OX9 2LQ	9 th March 2018	2
P18/S0931/FUL	The Bungalow Oxford Road Tiddington OX9 2LH	1st June 2018	2 (net of 1 counted as was sub-division of 1 house).
P21/S3054/O	Site adjacent Homeward Oxford Rd Tiddington OX9 2LH	8th September 2021	2
Total			10

Response 10

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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<p>Response received via email from Natural England. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-11-04 NE.pdf [REDACTED]

Your details and future contact preferences

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	██████████
Job title (if relevant)	Advisor
Organisation (if relevant)	Natural England
Organisation representing (if relevant)	-
Address line 1	County Hall
Address line 2	Spetchley Road
Address line 3	-
Postal town	Worcester
Postcode	WR5 2NP
Telephone number	-
Email address	consultations@naturalengland.org.uk

Date: 04 November 2022
Our ref: 407441
Your ref: Tiddington with Albury Neighbourhood Plan



██████████
South Oxfordshire District Council

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

BY EMAIL ONLY
planning.policy@southandvale.gov.uk

T 0300 060 3900

Dear ██████████

Tiddington with Albury Neighbourhood Plan – Pre-submission

Thank you for your consultation on the above dated 08 September 2022.

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.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers 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 sincerely

██████████
Consultations Team

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/>

Response 11

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Tiddington with Albury 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>Response received via email from Waterstock Parish Meeting. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-11-08 Waterstock Parish Meeting.docx [REDACTED]

Your details and future contact preferences

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	██████████
Job title (if relevant)	Chairman
Organisation (if relevant)	Waterstock Parish Meeting
Organisation representing (if relevant)	-
Address line 1	-
Address line 2	-
Address line 3	-
Postal town	-
Postcode	-
Telephone number	-
Email address	████████████████████

Waterstock Parish Meeting welcomes the opportunity to comment on the Tiddington-with-Albury Neighbourhood Plan (“TNP”) and thanks SODC for its invitation to comment.

Introduction to Waterstock

The parish of Waterstock, which is located immediately to the north and west of our neighbour Tiddington:

- is entirely ‘washed over’ by the Oxford Green Belt;
- is designated an “*Unlisted Village*” in SODC’s Local Plan;
- is bounded to the north by the River Thames and its floodplain, which have created one of Oxfordshire’s most highly regarded *Local Wildlife Sites*, a haven for protected species including curlews and otters, as well as nationally rare plants such as the Greater Dodder;
- Is traversed by *The Oxfordshire Way*, running from Bourton-on-the-Water in Gloucestershire to Henley-on-Thames, one of the County’s most popular recreational routes, which enters Waterstock from the north by the eighteenth century (listed) Bow Bridge that passes over one of the channels of the River Thames, and which features on the cover of the published Guide of the Oxfordshire Way.;
- Has a thriving pay and play golf course, Waterstock Golf Club, which attracts players from neighbouring towns and villages; and
- Is a centre for equestrian sports.

Until shortly after WWII, the entire parish, other than the Church and Rectory, belonged to the Ashurst family. Today, the village, located in an extensive Conservation Area, has barely changed from earlier times. There are several listed buildings including the 12th century St Leonards Church and the thirteenth century Orchard House, a thatched cottage of cruck construction. The former watermill is recorded in the Domesday Book, although the present structure is mainly seventeenth century. The village lane is flanked by some fine Victorian estate cottages.

Waterstock is relatively unusual among Oxfordshire villages in not being situated on a main through road, but on a loop off the A418, with little traffic passing through the village.

Its name meaning ‘waterplace’ suggests Anglo-Saxon origins. Many of the fields show ridge and furrow strip cultivation. In 1279 there were probably about 200 inhabitants but after the Black Death the population decreased to 51 persons over the age of 14. Today, there are some 67 residents, of whom 5 are children.

Waterstock’s comments on the Tiddington NP

Waterstock strongly supports Tiddington’s NP.

Our submission begins by focussing on shared infrastructure deficiencies in relation to sewage, water mains, and highways that would need to be addressed before any large-scale development projects are ever allowed to proceed.

It then goes on to consider a number of other aspects.

A: Shared Infrastructure Deficiencies:

(1) Outdated and inadequate Sewage provision: TNP Paragraphs 2.15 and 2.28-32

The TNP refers to problems with the sewage system and the transfer of waste to the Waterstock treatment works.

Waterstock echoes these concerns and adds the following comments.

It has been indicated by Thames Water that the Foul Sewer system, built in the mid 1970's was designed only for the assessed housing need at that time. The many additional connections since that time now cause considerable system overload even in moderate rainfall, with consequent spillage of sewage in people's gardens. Recent investigations and excavations have shown many of the earthenware sewer pipes to be cracked or broken by ground movement and, no doubt, the pounding of heavy vehicles passing above on rough and potholed roads. Prior to several months of excavations and pipe repair works, spillage from manholes in the road resulted in ponding of sewage over a number of weeks across Waterstock Lane, which is used not only by vehicles but also as a section of the Oxfordshire Way, used by many walkers, often with their children, prams and dogs, oblivious to the foul water they were walking through.

Waterstock was fortunate to be selected to have the entire system internally lined to try to prevent the ingress of ground water, but Waterperry and Tiddington not so, where the vulnerabilities continue.

The Waterstock sewage treatment works are situated on top of a rise so the sewage from all 3 villages has to be pumped from a sump through rising mains to the treatment works. It is understood that these are 5-inch pipes which were installed 50 years ago with little spare capacity. In consequence, any largescale development that takes place in the future would require this whole system to be re-laid to an enlarged treatment works, especially now when much emphasis is being placed on reducing or eliminating sewage spillage into rivers. The section of the River Thame at Waterstock, with its designated Local Wildlife Site status, is especially vulnerable, being such a short distance downstream from the treatment works.

We believe that these deficiencies would need to be addressed before any large-scale development is allowed to proceed.

(2) Outdated and inadequate Mains Water supply: TNP Paragraph 2.31

Waterstock wishes to reinforce the points in the TNP concerning mains water :

The mains were laid in the 1950's in Waterstock and perhaps even earlier in Tiddington. They now suffer from frequent leakages and occasional bursts, indicating their fragility. They appear to be undersized for the present population. After this very dry summer, with the whole year likely to become the driest on record, we understand the reservoir at Farmoor supplying our water to be 30 feet below full.

Again , we believe that these deficiencies would need to be addressed before any large-scale development is allowed to proceed.

(3) Highways Capacity Constraints: TNP Paragraphs 5.44-5.54 and Appendix 6.

Waterstock supports and shares the concerns about the impact of increasing traffic flows in Tiddington village.

Waterstock commissioned a traffic assessment of the potential impact on Waterstock and Tiddington of a major mixed development on Waterstock Golf Course of 1750 houses, a warehousing and distribution centre together with primary school and small scale retail on the A40/418 and M40 Junction 8a, which has been submitted for consideration under the ongoing SODC 2041 Plan workstream.

The traffic assessment was commissioned by Waterstock Parish Meeting in late 2021 and reported in early 2022.

Based on a County Council current traffic survey commissioned by Waterstock, and part-funded by Waterstock and Tiddington, the report forecast a 15% increase in traffic through Tiddington resulting solely from that proposed development, together with a need for extensive works including rebuilding the present M40 Junction 8a, and reworking the A418/A329 roundabout at Thame, summarised more fully below.

Given the current already high utilisation levels of road capacity – which may be understated as the count was conducted during the emergence from Covid – even this single development would have significant consequences in increased traffic levels, and congestion and delays, requiring extensive infrastructure investment.

Since the report was intended to deal solely with the potential consequences of the proposed Golf Course development, it intentionally excluded the future impact of other development planned or likely to occur nearby, notably at Thame and Haddenham.

The golf club development may, of course, never proceed, but the report does show that even a relatively small increase in traffic flows would create a major impact on an already highly utilised local road system, and on the A418 through the centre of Tiddington.

Although specific to the proposed development at Waterstock Golf Club, the summary that follows should be read as indicative of the sensitivity of the local network to similarly increased traffic flows from any source.

- **Summary of Traffic Report on Impact of potential Development at Waterstock Golf Club**

This is a summary assessment of the impact of traffic attributable to the potential development at Waterstock Golf Club on the A418/A40 and Junction 8a of the M40, and the extensive engineering works likely to be required to accommodate it. ¹

The public access to Waterstock Golf Club (the potential development site) is from the Eastern roundabout at Junction 8a of the M40, and next to the Southbound slip road. The golf club site lies North of the single carriageway A418 between the motorway junction and the village of Tiddington which is bisected by the A418. Since the M40 was constructed the A40 has shared the A418 carriageway from the slip road West of the motorway junction to the crossroads known as Waterstock Turn, which is the access to Waterstock village, where the A40 turns Southwards towards Milton Common, Tetsworth and High Wycombe on its original pre-M40 route.

The double roundabout and bridge layout of Junction 8a constructed when the M40 was extended to Birmingham, appeared inadequate at the time of construction. A later contentious decision to site the new Motorway Service Area at Waterstock, with access only from the Western roundabout has exacerbated the impact of the constrictions of the layout on what is already a busy road.

It was clear that any significant development of Waterstock Golf Club , particularly involving quantity of new HGV journeys implicit in a distribution centre, would be likely to stretch the highway network

¹ This development is referred to several times in the TNP including at paragraphs 2.24, 3.12 and 5.59, with Tiddington expressing its strong opposition. Waterstock wholly concurs.

well beyond its capacity, creating considerable disruption to the free flow of traffic and particularly to Tiddington.

Waterstock therefore asked a friend of the village, Christopher Shaw, Incorporated Engineer, Member of Institution of Civil Engineers and Member of Chartered Institute of Highways and Transportation, to professionally assess the potential impact.

At his suggestion Waterstock, with its neighbour Tiddington, funded a new Manual Classified Traffic County Traffic Count which was undertaken by Oxfordshire County Council in November 2021.

Christopher Shaw assessed both the current capacity utilisation of the roads and the impact on them of the proposed development for distribution, housing, retail and a school as described in the February 2019 submission on behalf of Waterstock Golf Club and Greystoke to the South Oxfordshire District Council 2035 Local Plan. This Plan is now being revised. It is known that the February 2019 proposal for development of the Waterstock Golf Club has been carried forward for consideration, although it is not known whether any changes or amendments have been proposed by the submitters.

Mr Shaw's assessment was contained in a 30 page report. In summary the findings were:

The Traffic Count showed the A418 (which is a signposted accident black spot as well as only single carriageway) to be already busy, carrying 16,700 vehicles a day with an effective capacity utilisation of 67%. An indicative peak hour trip generation analysis using the TRICS database showed that the development would create an additional 1599 two way (in and out) movements in the a.m. peak hour and a further 1496 in the p.m. peak hour.

The 12 hour "full development" flows at crucial points shows a 42% increase in 12 hour flows over the bridge joining the twin motorway junction roundabouts and a 45% increase in flows on the A418/40.

Overall, this would increase traffic flows from 16,917 units to 24,070 units at the Motorway bridge; from 14,122 to 17,320 on the A418/A40; and from 11,916 to 14,070 through the centre of Tiddington. This would take RFC ratios over the practical capacity of the roadways.

Peak hour flows especially at both M40 roundabouts; on the development site Western entrance/exit; and on the Thame roundabout would cause extensive queueing and congestion. Additionally traffic on the A40 at Waterstock would be turning across oncoming vehicles as would also be the case at the development site's Eastern entrance/exit near Tiddington, and traffic flows through the centre of Tiddington would be likely to be insupportable.

Taken altogether the assessment indicates that the development would require extensive remodelling of the 8a roundabout and bridge layout; could necessitate a Tiddington bypass; and would require reworking of the Thame bypass roundabout.

No account has been taken in these calculations of the increase in traffic attributable to already planned development at Thame, Haddenham and Aylesbury, which would exacerbate the extent of the problems and the speed with which they would become urgent.

Separately, we note the references to M40 Junction 7 and would like to emphasise the fact that Junction 7 is only southbound on and northbound off. Most traffic from areas south of the M40 served by the A329 must use the old A40 Milton Common road down to Waterstock crossroads to access the M40 northwards. We understand that, because of Junction 7's close proximity to Junction 8, it will not be feasible to address these limitations in Junction 7.

B. Footpaths and Bridleways: TNP Paragraphs 5j, 5.57 and A3.3

Waterstock strongly supports the importance that Tiddington attaches to local footpaths and bridleways. The Oxfordshire Way, which traverses both Tiddington and Waterstock, is a very popular recreational right of way and is regularly used by horse riders from the riding school in Waterstock. The cover of the official guide to The Oxfordshire Way, published by CPRE and the Oxford Fieldpaths Society, has a photograph of Bow Bridge over a channel of the River Thames on the Waterstock/Waterperry boundary.

C. Hydrology. TNP Appendix 2.2

The Environment Agency Flood Risk Zones map at Fig.A2.2 extends to the area surrounding Waterstock village and shows the centre of the village, including several homes, within a high-risk flood zone. This results from water fed by the village ditch that originates on the higher ground north of the A418 at Tiddington and West of the crossroads.

Any development at Tiddington on land north of the A418, which would drain into the Waterstock catchment area, would increase the rate and quantity of rainwater run-off to add significantly to the ditch system already overloaded in periods of heavy rainfall.

This would exacerbate the flood risk to the centre of Waterstock village, and any such development would be vigorously opposed by Waterstock.

D. Nature Recovery.

The extensive River Thames floodplain between Waterstock and Thame has created a haven for wildlife and both Waterstock and Ickford in Buckinghamshire already have designated Local Wildlife Sites on this section of the river.

Tiddington, a neighbour to both villages and with river floodplain and farmland, is therefore a crucial target area to create larger and better-connected wildlife habitats.

Waterstock's designated *Local Wildlife Site* (60HO4 Waterstock Mill) is regularly subject to bird, fish, moths, plant and other surveys, which have each confirmed its significant wildlife importance. It is a rare breeding area for curlew and the only recorded breeding site in Oxfordshire for goosanders. Otters also breed here. It is home to nationally rare plants including the Greater Dodder.

So, we strongly support our neighbour Tiddington's stated Vision and Objectives, with the emphasis on the protection and enhancement of the River Thames and its extensive floodplain. We especially welcome the following statement (TNP paragraph 5.6):

"This policy seeks to conserve the wildlife habitats on the south bank of the River Thames to enlarge and strengthen these environments, the creation of a biodiversity corridor between the River Thames and the ancient woodland on the higher slopes of the Parish....."

and again, in TNP paragraph 6.4 under the heading "*Local Infrastructure Improvements*", Tiddington's expressed priority of:

"setting up a wildlife corridor to link with Waterstock and Ickford, the Tiddington Nature Recovery Corridor."

Waterstock looks forward to working with Tiddington to deliver that priority.

In November 2020, the River Thame Conservation Trust (RTCT), the Freshwater Habitats Trust and Thames Water co-published “*The River Thame Catchment: Identifying Important Freshwater Areas*” available at <https://riverthame.org/wp-content/uploads/2021/02/Thame-catchment-IFA-FINAL.pdf> . This report designated the stretch of the River Thame and floodplain from Waterstock to Shabbington, including Tiddington, as an *Important Freshwater Area*.

This is reflected in Oxfordshire’s draft Nature Recovery Map.

The RTCT has recently published the *River Thame Bird Atlas* (available at [Bird Atlas 2016-2020 | River Thame Trust](#) .) The species abundance heat map confirms the importance of the Waterstock section of the River Thame (Tetrad: SP60H). Tiddington’s proximity to Waterstock leads us to suspect that that the list of “protected or notable species” in Table 2 in paragraph 5.12 underestimates the diversity of species that are, in fact, present there.

Work is now ongoing with the Thames Valley Environmental Records Centre (TVERC) to submit the Waterstock to Thame section of the River Thame as a potential new *Oxfordshire Conservation Target Area* in connection with the ongoing work on the Oxfordshire’s Local Nature Recovery Strategy.

(END)

Response 12

Respondent Details

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[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
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<p>Response received via email from Thames Water. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-11-11 Thames Water.pdf [REDACTED]

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Title	-
Name	██████████
Job title (if relevant)	Property Town Planner
Organisation (if relevant)	Thames Water
Organisation representing (if relevant)	-
Address line 1	1st Floor West
Address line 2	Clearwater Court
Address line 3	Vastern Road
Postal town	Reading
Postcode	RG1 8DB
Telephone number	-
Email address	██████████@thameswater.co.uk



South and Vale Council

Issued via email:
planning.policy@southandvale.gov.uk

[REDACTED]
[REDACTED]
[REDACTED]
1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

11 November 2022

South Oxfordshire – Tiddington with Albury Neighbourhood Plan

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the South and Vale area 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 consultation in relation to our water supply and sewerage undertakings:

Paragraphs 2.28-2.31 – Specific Comments on Water and Wastewater/Sewerage Infrastructure

2.28 There are several isolated cottages without mains drainage. Milton Common has a stored sewage system that is pumped down to the Tiddington pumping station overnight. This has caused several problems, particularly in Sandy Lane. Consequently, there are limitations on new development.

Response - These cottages, as far as we are aware, are currently served by individual cess tanks, and maintained by the property owners.

The sewage pumping station at Milton Common, is fitted with 2 pumps, that operate in a duty/standby configuration and as such, pumps continuously throughout the day and night when the pumps are triggered by sufficient capacity entering the stations wet well. Sewage from this pumping station is pumped directly to Tetsworth STW.

The Catchment of Tiddington is served by Tiddington STW and is served by pumping stations at Waterperry, Waterstock and Tiddington. This particular catchment has experienced flooding in recent years. This has been due to a combination of several heavy and prolonged summer storms that have been witnessed since 2020. This rainfall has been

falling onto hard ground and resulting in severe groundwater run-off that has pooled and flooded the area at the bottom of Sandy Lane. During the winter Flooding has also been witnessed, due to storm waters infiltrating our sewerage network, and on occasion has resulted in over loading of the network. This summer, a programme of work has been undertaken to line specified known hotspots of our network to prevent infiltration occurring. We are now monitoring these areas, and identifying any further areas for next summer.

2.29 *Sewage tankers commonly unload at a manhole on the village green, damaging the village green in the process.*

Response - This is incorrect. Our tankers have been called into operation within this catchment to pump out foul water from the network to alleviate the flows entering the network and sewage pumping stations. This has in turn lessened the flows downstream and ensured that the sewage treatment work remains operational and compliant.

Occasionally, these tankers are prevented from accessing a suitable working area due to vehicles parking on top of manhole and access points, narrow roads etc. In order to access the network, and to provide a safe place of operations for both the public, road users and our staff, encroachment on to grass verges, or the village green as highlighted in this scenario has been observed. Should residents of Milton Common feel that excessive damage to this amenity is being caused, then they need to report it through to our customer contact centre.

2.30 *Tiddington has suffered problems with the capacity at the pumping works that transfer waste to the Waterstock Sewage Treatment Works.*

Response - Please refer to the points regarding summer storms and winter infiltration in paragraph 2.28. Without the issues of infiltration, the pumping stations that serve this catchment are more than sufficient to cater for the expected flow from these settlements. Ongoing monitoring of the network and identification of areas of infiltration will continue throughout winter months, with any rectification works commencing during dry weather periods.

Should residents suffer flooding to their properties, they are encouraged to contact Thames Water either via our website ([Flooding | Emergencies | Help | Thames Water](#)) or via our customer contact centre (08003169800).

2.31 *SODC considers that water resources are at or near capacity. This is compounded by the problems with the water mains, particularly on the A418, which have failed at least 8 times in the period 2019 to 2021. These incidents lead to considerable flooding around the junction with Ickford Road, and the associated houses.*

Response - We have plans for mains replacement work on Ickford Road currently scheduled to begin in April 2023 to run for approximately 6 weeks.

General Water and Wastewater Infrastructure Comments

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), 2021, 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 11 states: *“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

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).

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 water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it 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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the 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 that the Neighbourhood Plan include the following policy/supporting 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.”

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Comments in Relation to Flood Risk and Sustainable Drainage Systems

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".

Flood risk sustainability objectives and policies 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.***"

Site Allocations

There are no new site allocations for us to comment upon, but infill development is mentioned. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

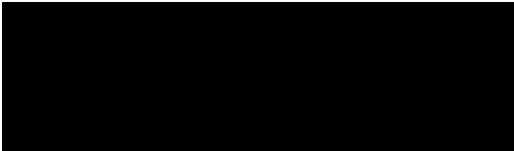
We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

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 Property Town Planner