



**BECKLEY AND STOWOOD
NEIGHBOURHOOD PLAN 2011-2035
CONSULTATION STATEMENT/REPORT
SUBMISSION VERSION
DECEMBER 2022**



CONTENTS

	Page
CONSULTATIONS AND COMMUNITY ENGAGEMENT	4
1. INAUGURAL MEETING	4
2. VISION FOR BECKLEY AND STOWOOD – INITIAL SURVEY RESULTS	4
3. CRITERIA FOR DEVELOPMENT SITES AND DESIGN	7
4. DESIGN CRITERIA	8
5. SURVEY LOCAL BUSINESSES AND ORGANISATIONS – EMPLOYERS	11
6. FIRST REGULATION 14 CONSULTATION	12
6.2. CONSULTEES	12
6.3. PUBLICITY FOR CONSULTATION	12
6.4. RESPONSES	13
6.5. A SUMMARY OF THE ACTIONS TAKEN	13
7. CYCLEWAY SURVEY	16
8. SECOND REGULATION 14 AND SEA CONSULTATION	19
8.2. CONSULTEES	19
8.3. PUBLICITY FOR THE CONSULTATION	20
8.4. RESPONSES – ISSUES ADDRESSED	22
8.4.1. OXFORDSHIRE COUNTY COUNCIL	22
8.4.2. SODC	25
8.4.3. NATURAL ENGLAND	31
8.4.4. HISTORIC ENGLAND	31
8.4.5. NATIONAL GRID	31
8.4.6. CPRE	31
8.4.7. LAND OWNERS – PEGASUS GROUP FOR CHRIST CHURCH LAND NORTH OF BAYSWATER BROOK	31
8.4.8. INDIVIDUAL RESPONSES	41
8.4.8.1 BECKLEY RESIDENT	41
8.4.8.2. WICK FARM RESIDENT	41
8.4.8.3. MEMBER LOCAL MINISTRY TEAM, THE CHURCH OF ENGLAND PARISH OF BECKLEY	41
8.4.8.4. JPPC RE SANDY ACRE	41
 APPENDICES REGULATION 14 FIRST CONSULTATION	
APPENDIX 1. STATUTORY CONSULTEE RESPONSES	43
APPENDIX 2. LOCAL PLANNING AUTHORITIES	54
APPENDIX 2.1 RESPONSE OXFORDSHIRE COUNTY COUNCIL	54
APPENDIX 2.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL	58
APPENDIX 2.3. STANTON ST JOHN PARISH COUNCIL	74
APPENDIX 3. NATIONAL CONSULTEES AND NHS	75
APPENDIX 3.1. NATURAL ENGLAND	74
APPENDIX 3.2 THE ENVIRONMENT AGENCY	81
APPENDIX 3.3. HISTORIC ENGLAND	82
APPENDIX 3.4. MARINE MANAGEMENT ORGANISATION	87
APPENDIX 3.5. OXFORDSHIRE CCG	90

APPENDIX 3.6. NATIONAL GRID	97
APPENDIX 3.7. SPORT ENGLAND	100
APPENDIX 3.8. BBOWT	103
APPENDIX 3.9. BLUE CEDAR HOMES	108
APPENDIX 4.1. INDIVIDUAL RESPONSES x 18	109
APPENDIX 5. MINUTES FROM THE PUBLIC MEETING	127
APPENDICES REGULATION 14 AND SEA SECOND CONSULTATION	130
APPENDIX 6. LIST OF CONSULTEES	131
APPENDIX 7. LOCAL PLANNING AUTHORITIES	137
APPENDIX 7.1 – RESPONSE OXFORDSHIRE COUNTY COUNCIL	137
APPENDIX 7.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL	143
APPENDIX 8. NATIONAL CONSULTEES	174
APPENDIX 8.1. NATURAL ENGLAND	174
APPENDIX 8.2. HISTORIC ENGLAND	176
APPENDIX 8.3. NATIONAL GRID	177
APPENDIX 8.4. CPRE	180
APPENDIX 9. LAND OWNERS PEGASUS FOR CHRIST CHURCH	181
APPENDIX 10. INDIVIDUAL RESPONSES	220
APPENDIX 10.1 BECKLEY RESIDENT	220
APPENDIX 10.2 WICK FARM RESIDENT	221
APPENDIX 10.3 LOCAL MINISTRY CHURCH OF ENGLAND	222
APPENDIX 10.4. JPPC - RE SANDY ACRE	223

BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN CONSULTATIONS AND COMMUNITY ENGAGEMENT

The Neighbourhood Plan has been developed with our local community to reflect their aspirations of how we want to see the parish of Beckley and Stowood develop. Here is a list of the consultations and dates.

1. Inaugural meeting	Meeting	January 2016
2. Initial Survey	Survey	June 2016
3. Criteria - development sites and design	Meeting	October 2016
4. Design criteria	Survey	November 2016
5. Local businesses and organisations	Survey	March 2017
6. Regulation 14 Consultation	Survey and meeting	December 2017
7. Cycleway Survey	Survey	March 2020
8. Second Regulation 14 and SEA survey	Survey	August 2022

1. INAUGURAL MEETING

At the very first meeting of Parishioners in January 2016 the issues identified that the Neighbourhood Plan should cover were -

- ***Preservation of the Green Belt***
- ***Traffic***
- ***Buses***
- ***Schools***
- ***Where to build***
- ***Design***
- ***Flooding and drainage***
- ***Keeping the pub***
- ***Businesses***
- ***Sustainability***
- ***Social housing, affordable housing***
- ***Mixed housing - housing for those who wish to downsize and remain in the village***

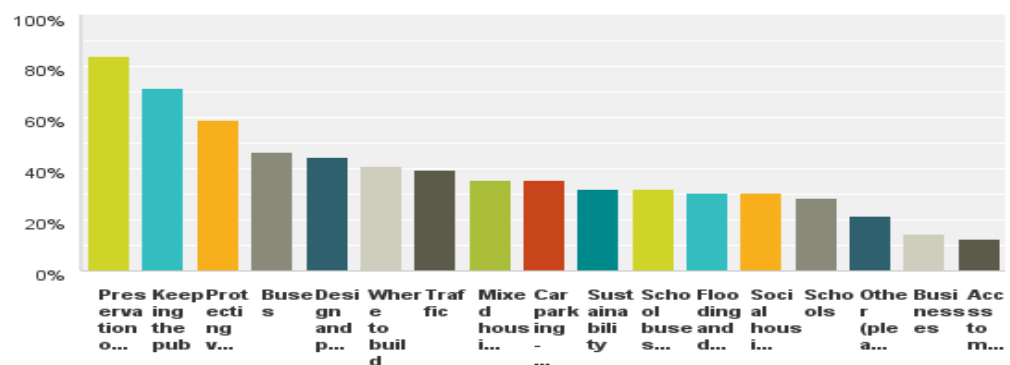
2. VISION FOR BECKLEY AND STOWOOD – INITIAL SURVEY RESULTS

This initial survey of parishioners was carried out in June 2016. The survey was delivered to every household in the Parish of Beckley and Stowood, was publicised in the Beckley Newsletter, which was also delivered to every household and by e-mail by the Parish Council and was available on line on the Beckley and Stowood web site. The full results can be found in Appendix Document B - Appendix 19.

The survey included demographic information, housing information – number of bedrooms, central heating fuel, desire to move house – wishes to upsize or downsize and commuting. Aspirations on development in the parish were also included. The issues identified in the inaugural meeting were ranked in order of importance.

Q23 A number of issues have been identified to be included in the neighbourhood Plan. Please could you indicate the most important to you and add others not already included below.

Answered: 56 Skipped: 0



Answer Choices	Responses	
Preservation of the Green Belt	83.93%	47
Keeping the pub	71.43%	40
Protecting views from the village	58.93%	33
Buses	46.43%	26
Design and planning	44.64%	25
Where to build	41.07%	23
Traffic	39.29%	22
Mixed housing – (housing for those who wish to downsize and remain in the village)	35.71%	20
Car parking - school, RSPB	35.71%	20
Sustainability	32.14%	18
School buses and buses	32.14%	18
Flooding and drainage	30.36%	17
Social housing/ affordable housing	30.36%	17
Schools	28.57%	16
Other (please specify)	21.43%	12
Businesses	14.29%	8
Access to main gas	12.50%	7
Total Respondents: 56		

Aspirations for the Next 15 Years

43% of respondents would like to attract younger people to the Parish and as the age profile is older this would change the complexion. 30% would like more small houses with 21% wanting more bungalows and houses suitable for the elderly. 21% wanted more mixed housing while 27% thought it should remain as it is. Although aspirations are clearly mixed there is a clear wish to attract more young people, while providing more mixed housing, including smaller homes for older people.

Importance of the Green Belt

There was considerable support for the Green Belt and its purposes, particularly in protecting the Parish from being part of Oxford City. 71% felt that older buildings such as barns should be developed and 52% sensible infilling. Although 20% felt that there should be no

development at all in the Green Belt, which as the whole Parish is 'washed over' by the Green Belt would mean no development whatsoever.

Employment

Numbers of respondents in employment were reasonably split with 37% of households where none were employed to 27% where one was and 34% where two were. This reflects the older age profile of respondents, who are probably retired.

A large proportion of people work at home, every day, while others work from home on some days, 2 or 4 days per week being the most popular. Otherwise, the most popular way to commute is by car or car and train. The average commute was 5-10 miles being the most popular, but most do not commute.

Apart from commuting and visitors other local traffic is connected with the school run. Most of those responding said their children cycle to school [37.5%] or are taken by car [25%] or coach [25%]. The journeys to school are quite short for most it was only 5-10 miles. However, this does not reflect the traffic problems associated with the school.

Issues for the Neighbourhood Plan

A list of issues for the Neighbourhood Plan were identified in the initial public meeting and views were sought about this original list and the answers ranked.

The most important issue for the Neighbourhood Plan was preservation of the Green Belt [84%], since there had been a number of threats to build on Wick Farm and other fields south of the B4027. This was closely followed by keeping the pub [71%] and protecting the views from the village [59%].

Design and planning, where to build, mixed housing and social/affordable housing were also high in the ranking and are issues that the Neighbourhood Plan can address.

Buses, traffic etc. are issues that the Plan cannot address, but could try to help alleviate with design and site criteria.

The full survey results can be found in Appendix 19.

3. CRITERIA FOR DEVELOPMENT SITES AND DESIGN

A meeting for the whole Parish was held on Monday 10th October 2016 at the Jubilee Hall. Approximately 40 people attended to discuss and decide the criteria for the development sites for new houses in the Parish. The full results can be found in Appendix Document B Appendix 20. These criteria are in addition to the national and SODC criteria: -

Local Development Site Criteria

- Infilling is acceptable – *"Infill development is defined as the filling of a small gap in an otherwise continuous built-up frontage or on other sites within settlements where the site is closely surrounded by buildings. The scale of infill should be appropriate to its location."* (SODC Local Plan Policy H16: Backland and Infill Development and Redevelopment Point 2.)

- Views from public places both to and from the village should be protected. New development that does not detract from the view of the skyline would be preferred.
- Developments should provide adequate parking spaces to meet residents' needs, to ensure that as far as possible parking on the road is unnecessary.
- A review of flood risk, including springs and water run-off is required for potential development sites.
- Gardens are a very important feature in Beckley and provision of a garden in proportion to the house size is an important criterion to the character of the village – *[Refer to Parish Character Assessments]*
- Generally, building with local materials including stone will be strongly preferred. Building materials of brick, rendered blockwork, timber or tile cladding and natural stone with roof covering of tiles or slate will be accepted. uPVC and other synthetic cladding materials will be discouraged
- Minimising paved and hard standing areas is strongly encouraged to minimise flooding and run off.
- Building of smaller houses is encouraged to help to ensure that local people have the opportunity of affordable housing or to downsize and stay in the village and maintain the vibrancy and vitality of the village

Appendix Document B Appendix 20. gives further details of the meeting outcome.

4. DESIGN CRITERIA

Following the design and development site criteria voted upon at the meeting in October '16 the whole parish was consulted in a survey on the outcome of the meeting, in November '16. The draft Beckley design guide was publicised in The Beckley Newsletter which is delivered to all households in the parish as the survey sought views on these proposals.

The on-line survey was set up with links in the newsletter and parish e-mails encouraging residents to participate.

The detailed results of the survey are in Appendix Document B Appendix 21.

Summary of Design Criteria Consultation Survey Results

83% of respondent agreed with the development and environment criteria. The individual responses can be found in the Appendix. There were several comments about the desirability of parking on a house driveway, rather than congesting roads further.

The views that were felt particularly important were those to and from Beckley across Otmoor, from Woodperry Road to Brill, from Common Road across Otmoor from Stowood across to Didcot and the M40 Stokenchurch cutting. Views within Beckley village that are valued are all the roads in the conservation area – Church Street, High Street and Otmoor Lane.

92% of respondents wanted to preserve the grass verges as an important feature in the village. Parking around the school was mentioned as a problem.

Design attributes that people would like to encourage are stone or brick construction, pitched roofs, a garden with sufficient space around the house at each side, two-storey and traditional in nature, blending with surrounding houses.

Designs that respondents wish to avoid are houses that 'look like it's meant for a seaside resort', avoiding pillars and balconies, pebble-dashed semis, houses out of character with the rest of the village and houses that are overly large and modern.

77% of respondents agreed with the Beckley Design Guide. There were 2 comments defending solar panels wherever they are placed on roofs.

All agreed with the proposal to have a co-ordinated scheme for street furniture and 92% were in favour of underground cables.

Environment

The Village draws much of its physical character from its rural location and from its Green Belt designation. This is of great value and should be strenuously preserved for the long term. Items of special note and worthy of protection are: -

1. The views from the village and from all the approach roads northwards over Otmoor and adjacent farmland, towards Brill and towards Didcot
2. The views into the village, particularly from the north, to the Church and conservation area.
3. The openness of the farmland and the associated groups of trees and hedgerows and other small fields, paddocks and large rear gardens.
4. Front gardens must be preserved and should not be taken up solely for the parking of vehicles. Guidelines are available from the Royal Horticultural Society on planting guides for front gardens and driveways.
5. Power cables should be located underground, not overhead.
6. Additional street lighting will be discouraged.

Traffic and Parking

Developments which increase the quantity of traffic and car parking, particularly in the village centre will not be encouraged.

Grass verges on the road frontage of dwellings are an important feature of the village and should be protected, preserved and encouraged as far as possible.

Beckley Design Guide

In cases where an acceptable and reasonable case has been made for development the design of extensions and new buildings will be expected to comply with the following guidelines: -

1. Views from public places both to and from the village should be protected. New development that does not detract from the view of the skyline would be preferred. *(Residents have no right of protection for views from their private property)*
2. Buildings should always be compatible with the size and character of their neighbours, and in the Conservation Area should generally be built of natural stone.
3. Access should be provided between any part of a building and the boundary with its neighbours and space between houses should be maintained as it is an important aspect of the village.
4. Building heights should be restricted to be in keeping with surrounding houses.
5. No building should be designed so that its height, massing and general scale is over dominant or intrusive over its neighbours.
6. Buildings should seek to preserve the daylighting, amenity and privacy of neighbours. i.e., as far as possible not overshadowing, overbearing or overlooking
7. Developments should provide adequate parking spaces to meet resident's needs, to ensure that, as far as possible, parking on the road is unnecessary.
8. Generally, building with local materials including stone will be strongly preferred. Building materials of brick, rendered blockwork, timber or tile cladding and natural stone with roof covering of tiles or slate will be accepted. uPVC and other synthetic cladding materials will be discouraged
9. Flat roofs are not regarded as being in character with the rural landscape and will generally be discouraged.
10. Large box type dormer windows with flat roofs will generally be discouraged.
11. While solar panels on roofs are encouraged, these should face the rear of the property where possible.
12. Outside lighting on buildings should be fully shielded to direct light downwards to prevent light pollution.

5. SURVEY LOCAL BUSINESSES AND ORGANISATIONS – EMPLOYERS

(Please see Evidence Base 1 – 2.6.1. and the survey analysis in Appendix Document A - Appendix 6.)

This consultation was carried out by on-line survey in March 2017 and publicised in the Beckley Newsletter.

There are 24 businesses and organisations listed in Appendix 2. and a further 3 local leisure and sport groups. Many of these are very small organisations - one-man [woman] bands. Only 6 local business and organisations responded to the survey, although there were several requests and reminders. However, those who did were some of the most significant and important employers – Beckley School, The Abingdon Arms, Stowood Instruments, Buswell Parks Mobile Homes at Wick Farm and some smaller, but long-standing well-known local businesses - MJ Bennett Property Development and John Moore Heritage Services.

The numbers of employees varied considerably from 20-30 to 1, as would be expected from the wide variety of business sizes responding. The businesses had operated in Beckley from less than a year (the new managers of The Abingdon Arms pub), to half the respondents who had been in Beckley more than 30 years.

There was interest in mains gas if it were to be made available. Currently the respondents use oil or LPG.

Looking at development in the parish most felt there was a need for low-cost housing and would like to attract a more mixed age group of residents. There was strong support for developing older buildings, such as barns for housing or business premises, outside the conservation area.

Most staff commute to work by car or cycle, or a few walk. The commuting distance is less than 30 miles, the most common between 5 and 20 miles. Concern was expressed about the lack of a bus service and car parking, but not traffic. The issues that concerned most was transport and commuting of staff and linked to that the availability of staff and affordable housing, presumably again for staff. There was a small concern expressed for the availability of business premises, but commuting was the main concern.

Please find the survey questionnaire in Appendix Document A - Appendix 7.

6. FIRST REGULATION 14 CONSULTATION

6.1. SUMMARY

The consultation was carried out between 1st December 2017 and 24th February 2018.

6.2. CONSULTEES

1. The Statutory Consultees

A list can be found in Appendix 1. These were all contacted by e-mail and a delivery and read receipt were requested. (Individual e-mails and names have been removed.) Their responses, where received are recorded in Appendices 2.

2. Residents of Beckley and Stowood Parish

In addition, the consultation was advertised to all residents of the Parish of Beckley and Stowood in the Beckley and Stowood Newsletter. This was delivered to every home in the Parish. The Plan was published on the Beckley and Stowood web site. Their responses, where received are recorded in Appendix 4.

3. Local Businesses and Organisation

Those identified in the Plan were contacted by e-mail and asked to respond. In addition, a reminder e-mail was sent. Only 2 local businesses responded.

4. Others with Interests in the Parish

A list of non-resident land owners was requested from SODC. SODC said they could not supply these data due to the Data Protection Act, although did state that the information was available on the land registry web site. The Steering Group did not have the resources to search the land registry web site and so contacted the non-resident land owners about whom they were aware.

6.3. PUBLICITY FOR THE NEIGHBOURHOOD PLAN CONSULTATION

The Neighbourhood Plan Pre-Submission Consultation was published on the Beckley and Stowood web site –

http://www.beckley-and-stowood-pc.gov.uk/?q=community/parish_council

There were a number of documents which are split onto 2 pages. The first page is the main report and summary and a link to the survey about it - <http://www.beckley-and-stowood-pc.gov.uk/?q=node/777> The second page is the Evidence Base containing appendices e.g. the detailed responses from consultations, reference documents and appraisals of the different areas in the Parish - <http://www.beckley-and-stowood-pc.gov.uk/?q=node/778>

There were also hard copies available of both the plan and questionnaire at the village hall and Abingdon Arms.

Responses were requested either on-line –

<https://www.surveymonkey.co.uk/r/BeckleyNPconsultation>

by e-mail or by post.

A public meeting was held at Beckley village on Tuesday 6th February at 8 p.m. and this was publicised in the Parish Newsletter, by poster on the Parish noticeboards and by e-mail. Over 44 people attended.

The minutes for the meeting can be found in Appendix 5.

6.4. RESPONSES

The detailed response can be found in the following appendices within this document.

APPENDICES

APPENDIX 1. STATUTORY CONSULTEE RESPONSES	42
APPENDIX 2. LOCAL PLANNING AUTHORITIES	53
APPENDIX 2.1 RESPONSE OXFORDSHIRE COUNTY COUNCIL	53
APPENDIX 2.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL	57
APPENDIX 2.3. STANTON ST JOHN PARISH COUNCIL	73
APPENDIX 3. NATIONAL CONSULTEES AND NHS	74
APPENDIX 3.1. NATURAL ENGLAND	74
APPENDIX 3.2 THE ENVIRONMENT AGENCY	80
APPENDIX 3.3. HISTORIC ENGLAND	81
APPENDIX 3.4. MARINE MANAGEMENT ORGANISATION	86
APPENDIX 3.5. OXFORDSHIRE CCG	89
APPENDIX 3.6. NATIONAL GRID	96
APPENDIX 3.7. SPORT ENGLAND	99
APPENDIX 3.8. BBOWT	102
APPENDIX 3.9. BLUE CEDAR HOMES	107
APPENDIX 4.1. INDIVIDUAL RESPONSES x 18	108
APPENDIX 5. MINUTES FROM THE PUBLIC MEETING	126

6.5. A SUMMARY OF RESPONSES TO CONSULTATION SUBMISSIONS

These were all analysed and considered and remedial action taken where it was thought necessary. As there was considerable concern about some issues including the proposed settlement boundary from a number of respondents the Neighbourhood Plan Steering Committee decided to apply for a grant for consultancy support and advice to review the Plan and policies.

A summary of actions taken to each response can be found below.

6.5.1. Oxfordshire County Council – *The comments point out the possibility that Oxford City's 'unmet' housing need may cause development in the Green Belt around Oxford. It also includes comments on public health and encouraging parishioners to walk and cycle. More information on health has subsequently been included.*

These comments were considered and the Local Plan section updated. (Full Response - Appendix 2.1)

6.5.2. SODC

SODC's guidance and advice would have been greatly appreciated earlier. Their support would have been welcomed. Their comments were noted, particularly on settlement boundary. A Planning Consultant with expertise has been engaged to address them and there have been a number of meetings to discuss policies. More recently a Strategic Environmental Assessment has been completed at their insistence. Policies have been discussed with SODC and amended accordingly. Since their comments the SODC Local Plan has been adopted. (Full Response - Appendix 2.2)

6.5.3. HISTORIC ENGLAND

The Plan has been updated with more recent history, as recommended. A list of listed buildings in the parish and a policy on preserving heritage has been added. The history and other background sections have been moved to a separate evidence base document, as suggested. (Full Response - Appendix 3.3)

6.5.4. OXFORDSHIRE CCG

Concern was expressed about large developments. The Neighbourhood Plan does not include any large or small developments. (Full Response - Appendix 3.5)

6.5.5. THE ENVIRONMENT AGENCY AND BBOWT

The detailed comments on the environment and examples from other Neighbourhood Plans were very much welcomed by the Steering Committee. The Plan needs more information on the Environment and to include policies to preserve it and biodiversity. These were added and extended extensively. New policies and community aspirations have been added. (Full Response - Appendix 3.2 and 3.8)

6.5.6. INDIVIDUAL RESPONSES

(Full Response - Appendix 4.1)

- Support the redevelopment of Wick Farm and barns - restoring dilapidated heritage assets - pragmatic approach - commercial or care
- Agree with 5.1.1. Development Site Criteria, 5.1.2. & Beckley Design Guide
- Support for burying cables
- Would like to encourage buildings to be sustainable with ecological standards. *Policies have been amended to include this.*
- Sensible to include a boundary for guidance for developers - boundary sensible but needs fine tuning - why are some fields to the north of High Street & down Church Street and along Common Road not included. Why are 1 or 2 houses within the boundary included when adjacent ones are not. *The settlement boundary has been redrawn.*
- Design Guide - solar panels should be allowed. *They have been.*
- 3.5.5. SODC's Emerging Local Plan - please continue to oppose removal of Wick Farm from the Green Belt - destruction of scenic area - the roads would not be able to cope
- Eager for the Plan to become 'made' and legal.
- Concerns about the Expressway and an original route between Beckley and Stanton St John and across Otmoor
- It is important to have some development to attract younger people into the village and promote downsizing
- Sensible to include village boundary and provide useful guidance for developers
- Important for residents to have their say on how the Parish develops and what new developments look like. Development Site Criteria and Design Guide good but need beefing up. SODC Planning Officers appear to disregard the policy that new developments should be in keeping with their surroundings
- APPENDIX 4.2 New Road Responses
 - A number of comments that there should be no development of 2 sites not previously developed, in the line of bungalows which all had planning permission. *The amendments to the settlement boundary now exclude this area and should allay their concerns.*

7. CYCLEWAY SURVEY

A number of residents had called for a cycleway between Beckley village and the edge of Oxford so people can cycle into Oxford, Headington, Cowley, the hospitals etc Stanton St John parish was also interested in this initiative. Approaches had been made to Oxfordshire County Council and there are a number of Government funded cycling and walking initiatives in progress at the moment.

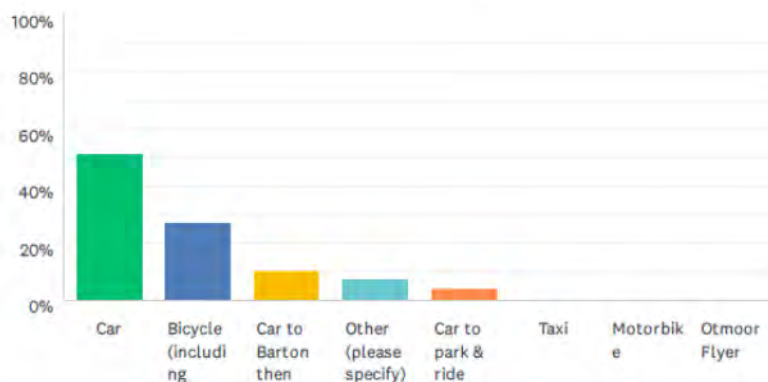
A survey was carried out of Beckley residents on the demand for a cycleway during March 2020. It was publicised in the Beckley and Stowood newsletter that is delivered to all households in the Parish and by e-mail to Beckley and Wick Farm/Barton residents.

The detailed results can be found in Appendix Document A Appendix 9.

Nearly 50% of the 78 respondents travel into Oxford 4 or 5 days per week. 51% by car and 27% by cycle.

Q4 What mode of transport do you normally use to get into Oxford, Headington, the hospitals etc? Please tick the box below.

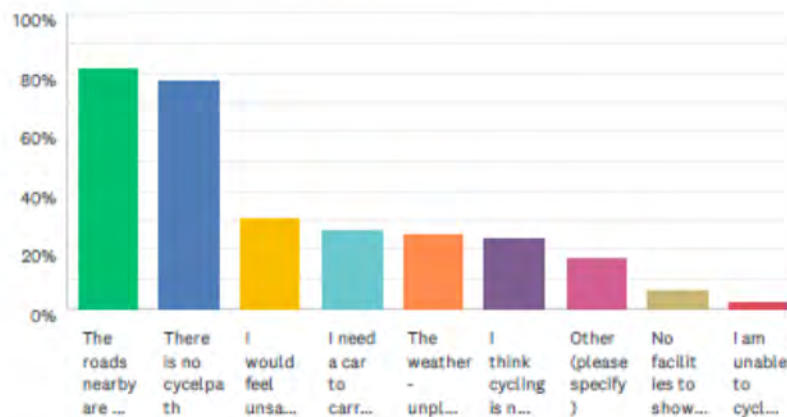
Answered: 78 Skipped: 2



ANSWER CHOICES	RESPONSES	
Car	51.28%	40
Bicycle (including e-bikes)	26.92%	21
Car to Barton then bus	10.26%	8
Other (please specify)	7.69%	6
Car to park & ride then bus	3.85%	3
Taxi	0.00%	0
Motorbike	0.00%	0
Otmoor Flyer	0.00%	0
TOTAL		78

Q7 What are your reasons for not cycling or not cycling more frequently if you have access to a bicycle (including e-cycle)? Please tick all that apply

Answered: 75 Skipped: 5

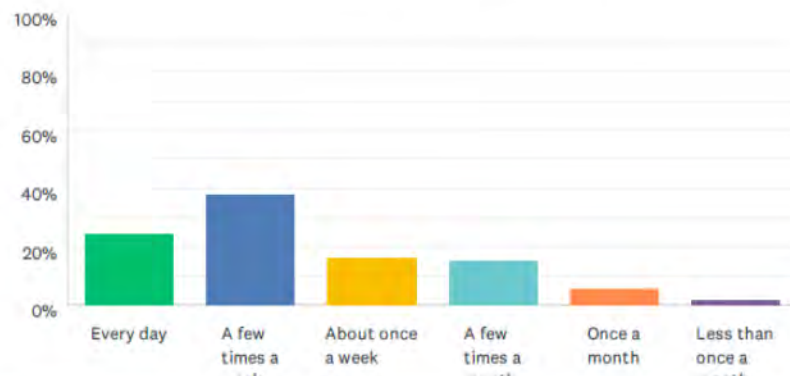


ANSWER CHOICES	RESPONSES	
The roads nearby are too busy and dangerous	81.33%	61
There is no cycle path	77.33%	58
I would feel unsafe in the dark	30.67%	23
I need a car to carry shopping etc	26.67%	20
The weather - unpleasant in cold and rain	25.33%	19
I think cycling is not safe enough	24.00%	18
Other (please specify)	17.33%	13
No facilities to shower and change at work/destination	6.67%	5
I am unable to cycle due to health problems	2.67%	2
Total Respondents: 75		

The main reasons cited for not cycling (more often or at all) are safety and lack of a cycle path.

Q9 If you do have access to a bicycle how often would you use it to get into Oxford, Headington etc/to Beckley if there was a cycleway from Beckley to the edge of Oxford?

Answered: 74 Skipped: 6



ANSWER CHOICES	RESPONSES	
Every day	24.32%	18
A few times a week	37.84%	28
About once a week	16.22%	12
A few times a month	14.86%	11
Once a month	5.41%	4
Less than once a month	1.35%	1
TOTAL		74

If there was a cycle path to Oxford 24% would use it every day, 38% a few times a week and 16% about once a week.

8. SECOND REGULATION 14 AND STRATEGIC ENVIRONMENTAL ASSESSMENT – PRE-EXAMINATION CONSULTATION

8.1. SUMMARY

The consultation was carried out between 1st August and 14th September 2022. The consultation submissions are copied in full in the appendices and the way the Neighbourhood Plan will address each issue raised is covered in detail in section 4. Responses.

8. 2. CONSULTEES

8.2.1 The Statutory Consultees

A list can be found in Appendix 6. It includes –

- 4 local councils,
- 14 local and neighbouring councillors and parish councils
- 24 other statutory consultees such as the coal board, the Environment Agency, Historic England, Natural England etc
- 7 local voluntary groups such as CPRE, Age Concern etc
- 22 local business and groups
- Local land owners
- All residents of Beckley and Stowood parish

These were all contacted by e-mail and a reminder sent a few days before the deadline. Their responses, where received are recorded in Appendices 2.

8.2.2. Residents of Beckley and Stowood Parish

In addition, the consultation was advertised to all residents of the Parish of Beckley and Stowood, in the Beckley and Stowood Newsletter. This was delivered to every home in the Parish. The Plan was published on the Beckley and Stowood web site. Posters were also placed on notice boards within the parish and on the Beckley Facebook page. E-mails were circulated to all on the Beckley and Wick Farm e-mail lists with reminders a few days before the deadline. Their responses, where received are recorded in Appendix 7-10.

8.2.3. Local Businesses and Organisation

Those identified in the Plan were contacted by e-mail and asked to response. In addition, a reminder e-mail was sent.

8.2.4. Others with Interests in the Parish

A list of non-resident land owners was requested from SODC. SODC had previously refused due to the Data Protection Act, although did state that the information was available on the

land registry web site. There was no response to a second request to SODC for this consultation. The Steering Group did not have the resources to search the land registry web site and so contacted the non-resident land owners about whom they were aware and had contact details. Most were covered by publicity to local residents.

8.3. PUBLICITY FOR THE NEIGHBOURHOOD PLAN CONSULTATION

The Neighbourhood Plan Pre-Submission Consultation was published on the SODC web site and Beckley and Stowood web site –

<https://www.beckley-and-stowood-pc.gov.uk/?q=node/1261>

The Plan, has 4 supporting documents Evidence Base 1 and 2 with background information on history, environment etc and 2 appendix documents. In addition, there is a separate report on the previous consultation.

The links to all these documents can be found below.

STRATEGIC ENVIRONMENTAL ASSESSMENT REPORT – 64 pages

<https://www.dropbox.com/s/mw7t7o4d87qw6oz/Beckley%20NP%20environmental%20report%20final.pdf?dl=0>

BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN – 72 pages

<https://www.dropbox.com/s/549gmcm23kz6czt/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20-%207.22.pdf?dl=0>

FEEDBACK FORM - <https://www.surveymonkey.co.uk/r/NeighbourhoodPlanSurvey>

SUPPORTING DOCUMENTS

CONSULTATION REPORT – 96 pages

<https://www.dropbox.com/s/1ph1471ndl3udde/Beckley%20and%20Stowood%20Neighbourhood%20Plan%20Consultation%20Report%206.22.pdf?dl=0>

Beckley & Stowood Neighbourhood Plan Evidence Base 1 –

<https://www.dropbox.com/s/qa5jazvozsuahg1/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20-%20Evidence%20Base%201%207.22.pdf?dl=0>

Beckley & Stowood Neighbourhood Plan Evidence Base 2 –

<https://www.dropbox.com/s/3p87iezmnucaelg/Beckley%20and%20Stowood%20Neighbourhood%20Plan%20-Evidence%20Base%202%20Section%202.11-5.4%20Character%2C%20Threats%2C%20Consultation%2C%20Policy%20Background%207.22.pdf?dl=0>

Appendices A to Evidence Base 1 –

<https://www.dropbox.com/s/3vyq2qmr784f3ty/Appendices%20A%20%20Beckley%20and%20Stowood%20Neighbourhood%20Plan%201-11%206.22.pdf?dl=0>

Appendices B to Evidence Base 2 –

<https://www.dropbox.com/s/7mnygyr2mwook4t/Appendices%20B%20-%20Beckley%20%26%20Stowood%20Neighbourhood%20Plan%2012-24%206.22.pdf?dl=0>

There were also hard copies available of both the plan and questionnaire at the village hall and Abingdon Arms and a copy was circulated to Wick Farm residents as there is no public building.

Responses were requested either on-line –

<https://www.surveymonkey.co.uk/r/NeighbourhoodPlanSurvey> or by e-mail or by post.

8.4. RESPONSES

Only 12 responses were received in total with an additional 2 with no comments on the Neighbourhood Plan. The responses are copied in full in Appendices 7-10.4. These were all analysed and considered and remedial action taken where it was thought necessary.

Issues from consultees are in black text and responses for the Neighbourhood Plan team in blue.

8.4.1 OXFORDSHIRE COUNTY COUNCIL

All the comments suggesting change have been addressed below. (Full response - Appendix 7.1)

POLICY H 1. PRESERVATION OF HERITAGE – this has been amended as per the County Council Archaeologists suggestion

DS1 – VIEWS – the views across Wick Farm have been removed from this policy.

The consultations with the Land north of Bayswater Brook site promoters will be added.

NB -

the development of the strategic site is expected to progress over several years and include reserved matters applications, and it is reasonable to expect ongoing discussions and liaison with parish councils.

HOW WILL THE CIL FUNDS BE SPENT? Some CIL money has already been spent on a new fence for the children's playground. The parish council will decide how CIL funds will be spent in the future and this will not be part of the Neighbourhood Plan.

Page 49 – “These improvements should be discussed and agreed with the “Community Liaison Committee”. Has been deleted.

Page 51 – The 2011 census data on vehicle ownership shows car ownership per household for wards and parishes around LnBB - Evidence base 2 5.3.4. This has been referenced and the numbers of cars expected at other strategic sites removed to the Evidence Base, but it is at least 1 car per household.

CAR PARKING POLICY DS2 – at the time of writing the new County Council car parking standards have not been agreed, but modified standards were agreed in November. The policy would not have been through examination. The cabinet documents¹ for the September '22 cabinet meeting include NPPF guidance on car parking.

2.2. The NPPF (paragraph 108) also confirms that ‘Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local

¹ https://mycouncil.oxfordshire.gov.uk/documents/s62138/CA_SEP2022R11%20Annexe%201%20-%20Vehicular%20and%20Cycle%20Parking%20Standards.pdf

authorities should seek to improve the quality of parking so that it is convenient, safe, and secure, alongside measures to promote accessibility for pedestrians and cyclists.'

The documents go on to say - "2.3. The NPPF also describes the plan-making system which includes local and neighbourhood plans that guide local communities to develop and shape their own surroundings. These plans often contain policies on car and cycle parking."

It is understood that the objective of this new parking policy is to try to reduce car ownership and usage by reducing car parking and the draft standards do stipulate that some villages like Beckley have no public transport or cycleways and therefore little opportunity to do this.

The Draft Parking Standards do contain proposals which are particularly useful and suitable for large developments such as Land north of Bayswater Brook, where the proposed 'no car' and restricted car policies proposed for 'edge of Oxford developments' would potentially have a very positive effect. So, this policy has been amended to exclude the Land north of Bayswater Brook development.

Our parish has very limited public transport and no cycleways. No new or additional alternatives to car use have been proposed in either the County Council's 'Central Oxfordshire Travel Plan' or 'Traffic Filters' scheme. Therefore, there is little alternative but for local residents to own and use cars to get around. The objective of our car parking policy is to encourage parking within the curtilage of their homes and not in the narrow village roads to reduce car parking and congestion on village roads and improve safety. At school opening and closing times the High Street can become completely grid locked. Car parking in roads makes them very difficult to navigate and reduces safety, particularly for pedestrians. Therefore, this policy is to be retained outside the LnBB development.

Policy CC 1 - Reference could be made in the supporting text to the Oxfordshire Electric Vehicle Infrastructure Strategy September 2021. This strategy appears to be for councils rather than Neighbourhood Plans.

Mitigation Policy TA 2 Transport Assessment and Travel Plan – removed as per suggestion as County Council will the scope and assessment parameters should be agreed with the County Council Highways Authority Officers

Mitigation Policy TA3 Transport Assessment and Travel Plan – Highway and Road Assessments This policy has been removed as the Highways Authority offers a service to scope out and agree the area for junction capacity modelling.

Mitigation Policy CM 1. Provision of Construction Management Plans – the SODC Validation checklist does not appear to include the important issues in this policy, some of which arise directly from local experiences with the Barton Park development. This policy it is to be retained.

Mitigation Policy TA 4 Compliance with NICE Guidelines on physical activity and the environment and health assessment- the additional County Council plans have also been referenced as recommended.

Mitigation Policy PC 1 Maintenance of access and separation of footpaths and bridleways – reference has been added to relevant County Council policies as suggested.

Mitigation Policy PC 2 Siting of pedestrian and cycle bridge over A40 northern bypass road and safety and crime reduction

The County Council advise that this draft policy is neither suitable nor appropriate for inclusion in a Neighbourhood Plan and has been deleted. These will be addressed at masterplanning and planning application stages.

Mitigation Policy PC3 Widening of Public Rights of Way for Safety – The County Council has advised that this policy is not appropriate in a Neighbourhood Plan so it has been deleted.

Archaeology Comments - Mitigation Policy - H1. Archaeological Site Survey - The County Council has recommended amending the policy on Archaeology, but removing policy H1 as it is covered in the Local Plan and their own monitoring. Both have been amended.

8.4.2. SODC

All the comments suggesting change have been addressed below. (Full response – Appendix 7.2)

1. Reference to Core Strategy – These have been removed as advised and updated to Local Plan policies.

2. References – Reference added to definition of Neighbourhood Planning. Other quotes are referenced throughout the Plan.

3. General comment on map legibility - This map has been copied from the Local Plan. It has been copied again in the hope it will be clearer and reference has been added to where it can be found in the Local Plan.

4. General comment on document accessibility – We will look into this.

5. Section 1.1: Basic Conditions – Amended as recommended

6. Submission Dates for the NP – These will be updated.

7. Objective 7: Reducing the Harm to the Environment and Residents from Development at Land North of Bayswater Brook – changed to Objective 7. **Protecting, the Environment and Residents from negative aspects of Development at Land North of Bayswater Brook**. It has been rewritten to include the SEA comments about the LnBB development – particularly health, biodiversity, climate change and landscape.

8. General comments on Policies VB 1. And VB 2 - this has been discussed several times with SODC and our planning consultant. The advice was that there was more clarity in keeping the 2 policies separate, and that was the decision both previously and now.

9. Policy VB 1. Settlement Boundary – ‘**Limited**’ Infilling has been added to reflect both the NPPF 149 wording on the Green Belt and Policy H16. More explanation has been added about the boundary as recommended.

10. Policy VB 2. Residential Development outside the Settlement Boundary – clarification in line with the NPPF on the Green Belt has been added as suggested.

11. Policy E 1. Biodiversity – The policy has been amended to make it more positive.

12. Policy H 1: Preservation of Heritage – The County Council has suggested alternative wording which we have used.

13. Policy DS 1. Important Views – There are 2 maps showing views one within the parish – Designation Neighbourhood Plan area and another indicating the distance. The maps need to fit into the A4 format of the report. The order of photographs and views also corresponds to the order of the Character Assessments of the Parish and all are taken from public points, and

this is covered in the Plan. View 10 across Wick Farm has been removed as it cannot be retained due to the LnBB development. View 6 is from Stowood towards Didcot and beyond. It is to be retained this view is important and along with views from Oxford towards LnBB n must be preserved.

14. Parking DS2. – at the time of writing the new County Council car parking standards have not been agreed and sent back to be discussed at the next cabinet meeting. The policy would not have been through examination. The cabinet documents² for the September '22 cabinet meeting include NPPF guidance on car parking –

2.2. The NPPF (paragraph 108) also confirms that *'Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe, and secure, alongside measures to promote accessibility for pedestrians and cyclists.'*

The documents go on to say - *"2.3. The NPPF also describes the plan-making system which includes local and neighbourhood plans that guide local communities to develop and shape their own surroundings. These plans often contain policies on car and cycle parking."*

It is understood that the objective of this new parking policy is to try to reduce car ownership and usage by reducing car parking and the draft standards do stipulate that some villages like Beckley have no public transport or cycleways and therefore little opportunity to do this.

The Draft Parking Standards do contain proposals which are particularly useful and suitable for large developments such as Land north of Bayswater Brook, where the proposed 'no car' and restricted car policies proposed for 'edge of Oxford developments' would potentially have a very positive effect. So, this policy has been amended to exclude the Land north of Bayswater Brook development.

Our parish has very limited public transport and no cycleways. No new or additional alternatives to car use have been proposed in either the County Council's 'Central Oxfordshire Travel Plan' or 'Traffic Filters' scheme. Therefore, there is little alternative but for local residents to own and use cars to get around. The objective of our car parking policy is to encourage parking within the curtilage of their homes and not in the narrow village roads to reduce car parking and congestion on village roads and improve safety. At school opening and closing times the High Street can become completely grid locked. Car parking in roads makes them very difficult to navigate and reduces safety, particularly for pedestrians. Therefore, this policy is to be retained outside the LnBB development.

15. Policy DS 3. Flood Risk and Development – policy amended to include 'flash flooding and provision of foul sewerage where there is no mains drainage.

² https://mycouncil.oxfordshire.gov.uk/documents/s62138/CA_SEP2022R11%20Annexe%201%20-%20Vehicular%20and%20Cycle%20Parking%20Standards.pdf

16. Policy DS 4. Dwelling Size – this policy does differ from the Local Plan as it incorporates DS2 The Parking Policy and the Beckley Design Guide. Additional wording on supporting smaller houses has also been added.

17. Policy DG 1. Beckley Design Guide – Shortening this policy would lose important detail developed by the community. The maximum height of 3 storeys is compliant with the Local Plan policies as described in the Text. The whole parish is in SODC not Oxford. The building heights in surrounding estates are confined to 3 storeys apart from some higher ones along the A40 ring road at Barton Park. If no maximum height were applied there could be 40 storey skyscrapers all over Oxfordshire which would be very damaging.

18. Policy DG 2. Night Sky/Lighting – We want to encourage less light pollution and wasted energy whether planning permission is required or not.

19. Policy CC 1. New Construction and Energy Efficiency – This policy has been amended as suggested to include policy DS10.

20. & 21. 5.7. Community Aspiration - Compliance with Beckley and Stowood Neighbourhood Plan Policies - the supporting text has been amended, but the issues remain and have been several planning applications have been granted that do not take account of Neighbourhood Plans – a case in Watlington that ONPA spoke to SODC about and more recently the granting of planning permission for a large solar park in the Green Belt at Nineveh Farm, Sutton Courtney.

23. Figure 2.1 – Explanation added.

24. Community Engagement – NPPFs on developers engaging with the community - NPPF guidance on Pre-application engagement and front loading 39-46 especially – 40 and 126. Therefore, this policy is appropriate and needed. It is supported by the County Council. Developers should communicate with the local community, including community representatives to gain their views and iron out problems. This is good practice. The developers have held workshops/webinars and consultations, but the communication is one way. The responses have not been published and there is no evidence that any have been considered or changes made in response.

25. & 26. A New Green Belt Boundary – NPPF corrected and STRAT 13 policy on the Green Belt boundary added. The reason English oak has been specified is that there is no geographical boundary and this is an indigenous local tree which is robust and will grow to a significant size, as opposed to the temptation to plant hedgerow trees such as hawthorn or blackthorn that can more easily be cut down.

27. TA1 – The County Council supports this policy
Some text has been added from the Local Plan for clarification on the transport mitigation policies., although we do not agree that the text was inaccurate or misleading. No duplication with p153 of the Local Plan can be found.

28. Mitigation Policy TA 2 Transport Assessment and Travel Plan – removed as per suggestion as County Council will the scope and assessment parameters should be agreed with the County Council Highways Authority Officers.

29. Mitigation Policy TA3 Transport Assessment and Travel Plan – Highway and Road Assessments This policy has been removed as the Highways Authority offers a service to scope out and agree the area for junction capacity modelling.

30. Mitigation Policy CM 1. Provision of Construction Management Plans – the SODC Validation checklist does not appear to include the important issues in this policy, some of which arise directly from local adverse experiences with the Barton Park development e.g., pile driving. This policy it is to be retained.

31. Mitigation Policy TA 4 Compliance with NICE Guidelines on physical activity and the environment and health assessment. The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care.³ Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important. The County Council Parking Standards have also not been examined and yet SODC complies with them.

32. Mitigation Policy PC 1 Maintenance of access and separation of footpaths and bridleways. This policy is supported by the County Council. It is important as some versions of the masterplan for Land north of Bayswater Brook have proposed using some footpaths as cycleways, which would be inappropriate and potentially unsafe for pedestrians.

33. Mitigation Policy PC 2 Siting of pedestrian and cycle bridge over A40 northern bypass road and safety and crime reduction

The County Council has advised that this draft policy is neither suitable nor appropriate for inclusion in a Neighbourhood Plan and has been deleted. However, it is not true to say there no evidence to support the location set out within the draft Neighbourhood Plan policy – Evidence Base 2 - 5.3.7.1. Pedestrian Connections particularly Figure PC 1.

34. Mitigation Policy PC3 Widening of Public Rights of Way for Safety – The County Council has advised that this policy is not appropriate in a Neighbourhood Plan so it has been deleted.

35. Mitigation Policy B 1. Provision of Public Transport – the proposals from the developers do not include sufficient bus routes. To date only routes to central Oxford and the JR are proposed. This is not sufficient. See proposals - <https://www.bayswateroxford.co.uk/assets/images/pdf/bus-routing-options-plan.pdf>

36. Mitigation Policy LR 1. Compliance with NICE Guidelines – Improving Air Quality

³ <https://www.gov.uk/government/organisations/national-institute-for-clinical-excellence>

The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care. Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important. The County Council Parking Standards have also not been examined and yet SODC complies with them.

37. Mitigation Policy SSSI 1. Report and Assessment Requirements for the SSSI Sydlings Copse and College Pond – The AECOM report on SSSI is flawed and of poor quality. See Evidence Base 2 5.4 for a very detailed appraisal. Further studies were recommended and the details of additional information which has yet to be delivered. There is no reason to delete this policy which is to protect the SSSI. It is concerning that SODC does not seek more protection for this fragile site. It is notable that SODC advises deletion of most of the mitigation policies and their advice is contrary to the County Council's.

38. Mitigation Policy SSSI 2. Implementation of Protection Zone from Roads – this policy does not duplicate STRAT 13. It adds important detail in order to help protect the fragile SSSI.

39. Mitigation Policy SSSI 3. Agreement of Landscape and Recreational Enhancements – SODC commissioned the questionable AECOM report, which contains the recommendations for a 200m buffer zone.

40. Mitigation Policy LV 1. Landscaping and Maintaining Important for Wick Farm and Lower Farm – This policy does not duplicate STRAT 13, but adds important detail to help protect residents at Wick Farm. In their last consultation in July 22 the developers of Land north of Bayswater Brook had not included a landscape buffer for Wick Farm in their masterplan.

41. Mitigation Policy – LV 2. Maintaining Privacy and Avoiding Overlooking - Building Heights – The policy on building heights within the parish and around existing residential areas – Wick Farm and Lower Farm is entirely consistent with policies in the Local Plan, both for this site and generally.

42. Mitigation Policy – LV 3. Specific landscaping and mitigation for loss of countryside – this does add important detail to the Local Plan policies and so is to be retained. Adding local detail is what Neighbourhood Plan are supposed to do.

43. Mitigation Policy LV 4. Avoiding Hard Urban Edges – this policy does add important detail and the policies cited from the Local Plan are concerned with other matters. It is to be retained.

44. Mitigation Policy LV 5. Design in sympathy with the landscape and surroundings – all the mitigation policies are confined to Beckley and Stowood parish and particularly concern the Wick Farm and Lower Farm areas where our parishioners live.

45. Archaeology Comments - Mitigation Policy - H1. Archaeological Site Survey - The County Council has recommended amending the policy on Archaeology, but removing policy H1 as it is covered in the Local Plan and their own monitoring. Both have been amended.

46. Mitigation Policy HAP 1. Air Quality Assessment and Mitigation – the wording has been changed to say that SODC should consider extending the air quality management scheme to LnBB. As before - The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care. Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important. The County Council Parking Standards have also not been examined and yet SODC complies with them.

47. Mitigation Policy HAP 2. Indoor Air Quality - As before - The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care. Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important. The County Council Parking Standards have also not been examined and yet SODC complies with them.

48. Page 44 Community aspirations A coordinated scheme for the design, painting, fixing and siting of street furniture should also be considered. This will be considered by the Parish Council at a later date, but will not be in the Neighbourhood Plan. Street furniture refers to signs etc rather than benches.

49. How will the CIL funds be spent? Some CIL money has already been spent on a new fence for the children's playground. The parish council will decide how CIL funds will be spent in the future and this will not be part of the Neighbourhood Plan.

8.4.3. NATURAL ENGLAND – No specific comments on the Neighbourhood Plan and no issues that need to be addressed. (Full response – Appendix 8.1)

8.4.4. HISTORIC ENGLAND - No specific comments on the Neighbourhood Plan and no issues that need to be addressed. (Full response – Appendix 8.2)

8.4.5. NATIONAL GRID - No specific comments on the Neighbourhood Plan and no issues that need to be addressed. (Full response – Appendix 8.3)

8.4.6. CPRE - pleased to see the policies on the environment, important views and dark skies. Suggested we consider reduction of visible light transmission. This was considered but it was felt overly restrictive and the evidence base was unclear. (Full response – Appendix 8.4)

8.4.7. LAND OWNERS – PEGASUS GROUP FOR CHRIST CHURCH AND SITE PROMOTERS OF LAND NORTH OF BAYSWATER BROOK (Full response – Appendix 9)

4. The SODC Local Plan is referred to in the third line of the Introduction.

The Neighbourhood Plan Area was designated by SODC the Planning Authority after consultation in June 2016. Christ Church and other developers had to opportunity to respond to this SODC consultation. It appears high-handed for Pegasus, Christ Church and the developers to presume to dictate the Neighbourhood Planning Area and surprising that there is such disregard for planning law. This Plan does confine itself to the designated area of Beckley and Stowood Parish.

It is unclear why the developers are concerned about communication with SODC. Their assumptions are untrue and, in any case, irrelevant, as it is the Neighbourhood Plan and Strategic Environmental Assessment which are the subject of this consultation.

6. The references to policies have been updated to those in SODC Local Plan 2035.

The Plan does not seek to reallocate sites. It does not have development sites within it.

The Plan does not promote less development than the Local Plan. The Neighbourhood Plan policies provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy. Neighbourhood Plans cover 15 years, but may need updating before that time.

Community Aspirations are clearly identifiable.

Section History of the Plan 1.4 will be updated.

8. It is not for a developer with financial interests in the Neighbourhood Plan area to dictate how the Neighbourhood Plan is written and try to rewrite it. It is to respond and comment on the policies constructively, nor to make incorrect assumptions about communication with LPAs.

11. Again it is not for a developer to try to rewrite a Neighbourhood Plan for its own financial advantage, but to comment constructively on the policies.

12. 4. Vision Statement and Core Objectives

This last bullet point has been amended. However, the SODC Local Plan development is in excess of local needs by between 5-8,000 dwellings. The Plan does not reallocate sites and more careful reading of the Plan may be helpful.

Core Objectives (Page 21)

There is no development in this Neighbourhood Plan, as the parish was originally all within the Green Belt, although the land for the development of LnBB has now been removed from the Green Belt.

“Objective 7. And 4.7 This has been redrafted.

The developers will know that neighbouring parishes are opposed to the development at LnBB, since they have been communicating with each other.

The developers list their consultation sessions. It is noted that these sessions were mainly one way communication. The webinars etc featured the developers telling attendees what they intended to do, with little opportunity to ask questions, especially difficult ones. Obtaining answers especially to ‘difficult questions’ was even more difficult. The consultation responses have not been published and there is no evidence any have been considered or acted upon.

Beckley and Stowood Parish Council asked to be invited to the session for Wick Farm, but were not. Residents felt threatened, angry and uninformed, with many unanswered concerns. The Parish Council requested copies of the materials used in this meeting to try to help answer Wick Farm residents’ questions. These were not provided.

The SSSI remains at significant risk from the LnBB development.

14. 5. It is not clear to what these general comments refer other than the developers would prefer the whole Plan is rewritten to their advantage.

5.1 The policies have been updated.

It is not clear why the developers are suggesting the following policies should be included when they refer to sites some distance from Beckley and Stowood –

H5 Land to the West of Priest Close, Nettlebed (Strategic)

H6 Joyce Grove, Nettlebed (Strategic)

H7 Land to the South and West of Nettlebed Service Station (Strategic)

Page 28 Policy VB 2 RESIDENTIAL DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARY – the suggested wording is poor, and is not positive. Developers should not try to rewrite Neighbourhood Plan to their advantage.

Policy VB 2 – this has been amended slightly in line with suggestions from SODC. It is not for a developer to redraft policies for their own advantage.

Policy E1. Biodiversity – this is in accord with the Local Plan policies. SODC have advised minor amendments.

H1. Preservation of Heritage – The County Council has suggested amendments to this policy, which have been made. We do not agree that it is not required, nor does the County Council. The Heritage across the parish and on the LnBB site is precious and to be preserved.

5.4. DEVELOPMENT CRITERIA – it now does refer only to the Local Plan.

5.4.1. Parking – The policy does now refer to the SODC Local Plan.

The cycle survey should have been read more carefully. The results are for those answering the survey, which was about cycling, so attracted keen cyclists. The percentages were percentages of those answering the survey, not representative of the whole population.

Policy DS2 Parking – Please see NPPF 108. The policy has been amended to apply to the parish excluding the LnBB development. The new County Council parking policies being reviewed will apply to LnBB.

The developers have had little regard throughout the Examination in Public of the SODC Local Plan or subsequently, for surrounding residents outside Oxford. Our existence has largely been ignored – views to be protected, existing residents, travel, landscape, climate change. Consultations and aspirations have been focused on Oxford, to the detriment of existing residents and neighbouring communities and parishes.

5.4.3 Dwelling Size – Old Local Plan references removed.

DS4 – parking policy DS2 and design policy are within it so it does not replicate H20 and the policy has been amended.

DG1. Beckley Design Guide – the community developed this guide and it remains.

Page 41 - 5.6. CLIMATE CHANGE POLICIES AND COMMUNITY ASPIRATIONS – they are in compliance

Page 41 - Policy CC1 NEW CONSTRUCTION AND ENERGY EFFICIENCY – This policy has been amended as suggested by SODC to include policy DS10.

Page 42 Community Aspirations - COMMUNITY ASPIRATION - RETROFITTING EXISTING HOUSES – it is not clear why the developers are complaining about this, unless they disapprove of sustainable heating systems.

Page 43 – 5.9 Redundant Farm Buildings – Wick Farm – Why should previous planning applications for Wick Farm be removed?

14.

Section 6. MITIGATION POLICIES FOR THE STRATEGIC DEVELOPMENT SITE “LAND NORTH OF BAYSWATER BROOK - It would obviously be financially beneficial for the developers to have all the mitigation policies removed, but it is untrue to say that “issues are already addressed

by the adopted SODC Local Plan policies". If this were true the developers would not ask for the policies to be deleted.

Why should the sentence be deleted? Is it an inconvenient truth that the Government policy is to protect Green Belt land?

The second paragraph regarding the ownership and historic ownership of the LNBB is irrelevant and should be deleted from the NP. Why should this be deleted? It is not incorrect and relevant.

The references to paragraphs 142 and 143 of the NPPF are misleading and should be corrected.

Paragraph 142 states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account..."

142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Paragraph 143 refers to defining Green Belt boundaries. Reference should be made to SODC adopted LP Policy STRAT6 – There must be compliance with the NPPF

143. When defining Green Belt boundaries, plans should:

(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Both have been copied into the Plan.

In preserving the setting and special character of historic towns such as Oxford there is no mention of the villages. Advice from a local expert planning solicitor was sought and 'town' in the Green Belt definition in the NPPF is not defined. In practice it refers to Oxford – a City and Kidlington – a village.

3. The Transport Infrastructure – This has been consistently ignored by the developers of LnBB as being too difficult and too expensive. It is of great concern to the existing residents of all the nearby communities and parishes.

6.1. COMMUNITY ENGAGEMENT STRATEGY (Page 47) – This has been changed to 'Involvement' as engagement has little meaning and is often a tick box exercise. The Developers have engaged with stakeholder, but not involved us. Communications have been

one way – webinars where questions were difficult, answers not forthcoming on difficult issues, responses to consultations unpublished with no evidence any notice has been taken.

There was a meeting with Wick Farm residents. Our parish council asked to be invited but were not. Residents were very upset, concerned and felt threatened. Despite requests the materials used at this meeting were not copied to the parish council.

6.2. THE GREEN BELT AND LOSS OF IMPORTANT LANDSCAPE AND COUNTRYSIDE (Page 49)

– It is strange that the developers refer to the Inspector’s report but call for reference to be deleted from the Plan.

MITIGATION POLICY GB 1. DEFINITION OF A NEW GREEN BELT BOUNDARY (Page 50) – The developers need to recognise their obligations under both the NPPF and Local Plan policies that a new ‘Defensible’ Green Belt boundary needs to be established. To date there has been no mention of it. Deleting inconvenient facts is not an option.

6.3. THE TRANSPORT INFRASTRUCTURE (Page 51)- This section is not misleading.

The 2011 census data shows that for Barton and Sandhills alone 0.97% of the 2,850 households had a car or van. In all the communities/parishes surrounding LnBB car ownership is 110%. i.e., as an average 1.1. cars or vans per household. The car ownership 2011 census data and analysis are available in Evidence Base 2 5.4.3.

MITIGATION POLICY TA 1. TRANSPORT ASSESSMENT AND TRAVEL PLAN (Page 52) – the text of this policy is supported by the County Council.

MITIGATION POLICY TA 2. TRANSPORT ASSESSMENT AND TRAVEL PLAN – BASELINE ASSUMPTION and **MITIGATION POLICY TA 3. TRANSPORT ASSESSMENT AND TRAVEL PLAN – HIGHWAY AND ROAD ASSESSMENTS** – these policies have been deleted as the County Council takes responsibility.

MITIGATION POLICY CM 1. PROVISION OF CONSTRUCTION MANAGEMENT PLANS – SODC’s validation checklist does not appear to include the important issues in this policy, some of which arise directly from local adverse experiences with the Barton Park development e.g., pile driving. This policy it is to be retained.

MITIGATION POLICY TA 4. COMPLIANCE WITH NICE GUIDELINES ON PHYSICAL ACTIVITY AND THE ENVIRONMENT AND HEALTH ASSESSMENT – This policy is certainly not superfluous and the developers of LnBB appear consistently not to have not addressed health issues. The SEA shows that health is likely to decline for existing residents in communities around the LnBB development, yet a health assessment is completely absent from the EIP scoping exercise. The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care.⁴ Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the

⁴ <https://www.gov.uk/government/organisations/national-institute-for-clinical-excellence>

health of existing residents is likely to get worse as a result of this development, so it is important.

MITIGATION POLICY PC. 1. MAINTENANCE OF ACCESS AND SEPARATION OF FOOTPATHS AND BRIDLEWAYS - This policy is supported by the County Council. It is important as some versions of the masterplan for Land north of Bayswater Brook have proposed using some footpaths as cycleways which would be inappropriate and potentially unsafe for pedestrians. Also, some footpaths and bridleways near Wick Farm have not been well maintained and access is sometimes difficult.

MITIGATION POLICY PC 2. SITING OF PEDESTRIAN AND CYCLE BRIDGE OVER A40 NORTHERN BYPASS ROAD AND SAFETY AND CRIME REDUCTION – This will be dealt with by the County Council with input from parish councils and local communities through consultation and the planning application.

MITIGATION POLICY PC 3. WIDENING OF PUBLIC RIGHTS OF WAY FOR SAFETY – this policy is certainly not covered under any policy in the Local Plan. Footpaths across fields could be replaced by narrow alleyways between houses which are not only unpleasant to look at and walk through, but also have personal safety issues. The impact on mental health could be significant both the loss of green space countryside and the fear of crime. On physical health narrow footpaths between fences do not invite people to take exercise.

Community Aspiration C 1. Provision of Cycleways This Community Aspiration should be deleted as all but one of these routes is outside the Neighbourhood Plan area. This is a community aspiration not a policy. The plans to date for LnBB include nothing about new residents of LnBB being able to get out into the countryside. Only a few routes into central Oxford are being considered. These comments also give rise to questions about any belief in ‘non car modes of transport’ by the developers. There appears to be little support or concern for local communities who have to commute or travel past the development to encourage cycling.

MITIGATION POLICY B 1. PROVISION OF PUBLIC TRANSPORT – to date the plans to provide public transport from LnBB have been inadequate. There are not enough different routes or destinations. There is no access to an integrated public transport system. If the desire is to get the residents to leave their cars at home and in fact to do without cars there must be an adequate alternative. The County Council agrees that providing travel routes confined to central Oxford is not realistic.

MITIGATION POLICY LR 1. COMPLIANCE WITH NICE GUIDELINES – IMPROVING AIR QUALITY - This policy should be deleted as Policy EP1 Air Quality in the adopted SODC LP covers these points. It is disappointing that the developers have not read these NICE guidelines before making their comments. If they had they would not have made them. The NICE Guidelines go far beyond the SODC 5-point policy. The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care. Its guidance should be seen as a minimum standard and its guidance on public health

and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important.

6.4. PROTECTION OF THE SSSI - SYDLINGS COPSE AND COLLEGE POND ... should be deleted

– The Local Plan does not cover these issues and few strategies have been seen so far to protect this fragile and very important SSSI site. It is not even included in the EIP Scoping report (October '22). The developer's approach to the SSSI is extremely concerning. This policy is very clearly needed.

MITIGATION POLICY SSSI 2. IMPLEMENTATION OF PROTECTION ZONE FROM ROADS – this certainly is not covered in STRAT 13.

MITIGATION POLICY SSSI 3. AGREEMENT OF LANDSCAPE AND RECREATIONAL

ENHANCEMENTS - This policy is not included in the Local Plan and will not be deleted.

6.5. PROTECTION OF WICK FARM AND LOWER FARM (Page 64) The Plan does not say that the Wick Farm listed barn is at risk, although it is very neglected and is extremely poor repair. The text has been clarified.

6.5.1. Landscape and Important Views Viewpoints - have not been agreed as the focus has been on Oxford not the local parishes including Beckley.

MITIGATION POLICY LV 1. LANDSCAPING AND MAINTAINING IMPORTANT FOR WICK FARM AND LOWER FARM (Page 67) - This policy does not duplicate STRAT 13, but adds important detail to help protect residents at Wick Farm. In their last consultation in July 22 the developers of Land north of Bayswater Brook had not included a landscape buffer for Wick Farm in their masterplan.

6.5.2. Maintaining Privacy and Avoiding Overlooking (Page 67),

These points are already addressed by Policy STRAT13 in the adopted SODC Local Plan, consequently the policy Mitigation Policy LV2 should be deleted. It is not addressed in the Local Plan The policy on building heights within the parish and around existing residential areas – Wick Farm and Lower Farm is entirely consistent with policies in the Local Plan, both for this site and generally.

MITIGATION POLICY – LV 3. SPECIFIC LANDSCAPING AND MITIGATION FOR LOSS OF COUNTRYSIDE (Page 68)

Again, this policy is covered by policies in the SODC adopted Local plan and should therefore be deleted. It is not covered by the Local Plan. This does add important detail to the Local Plan policies and so is to be retained. Adding local detail is what Neighbourhood Plan are supposed to do.

MITIGATION POLICY LV 4. AVOIDING HARD URBAN EDGES (Page 68)

Again, as above please see all the consultation that has taken place to date on the preparation of the planning application <https://www.bayswateroxford.co.uk/our-vision/> This matter is covered by policies in the adopted Local Plan and therefore should be deleted - this policy does add important detail and the policies cited from the Local Plan are concerned with other matters. It is to be retained.

6.6. PROTECTION OF HERITAGE AND LISTED BUILDINGS (Page 69) - The County Council has recommended amending the policy on Archaeology, but removing policy H1 as it is covered in the Local Plan and their own monitoring. Both have been amended.

MITIGATION POLICY HAP 1. AIR QUALITY ASSESSMENT AND MITIGATION -- the wording has been changed to say that SODC should consider extending the air quality management scheme to LnBB. As before - The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care. Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important.

MITIGATION POLICY HAP 2. INDOOR AIR QUALITY - As before - The National Institute for Health and Care Excellence (NICE) provides national guidance and advice to improve health and social care. NICE is an executive non-departmental public body, sponsored by the Department of Health and Social Care. Its guidance should be seen as a minimum standard and its guidance on public health and lifestyles should be implemented by local government as appropriate. It is concerning that this guidance has not already been adopted by SODC. The Strategic Environmental Assessment shows that the health of existing residents is likely to get worse as a result of this development, so it is important.

16. The Neighbourhood Plan should be redrafted and confine itself to areas of the Parish beyond the strategic allocation of LNBB which is covered by policies in the adopted Local Plan. Section 6 of the NP should be deleted as it does not support the allocation of LNBB, instead it seeks to undermine the Local Plan allocation and its delivery.

The Neighbourhood Plan Area was designated by SODC the planning Authority after consultation in June 2016. Christ Church and other developers had the opportunity to respond to this SODC consultation. It appears high-handed for Pegasus, Christ Church and the developers to presume to dictate the Neighbourhood Planning Area and surprising that there is such disregard for planning law. This Plan does confine itself to the designated area of Beckley and Stowood Parish. The Neighbourhood Plan does not seek to undermine the Local Plan or the Land north of Bayswater Brook development, but to add important detail to Local Plan policies to help protect the environment, the SSSI and the residents, whose health is likely to be impacted negatively by this development.

NPPF 13. The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

The Parish Council along with local residents have been consulted on the preparation of the planning application and will be formally consulted by SODC once the application is submitted.

The developers of Land north of Bayswater Brook have consulted Parish Councils and local residents on various versions of the masterplan but consultation responses have not been

published and it is not clear if any consideration has been given to the responses they received or any action taken to address the many issues raised.

17. SEA – Comments to the previous Reg 14 consultation are published in the earlier Reg 14 consultation report.

This section contains the developers' version of a long history of the SEA, but does not make any comments on the SEA.

Paragraph 1.4 of the SEA refers to a draft Scoping report which was sent to the Environment Agency, Historic England, Natural England and SODC on 29th March 2022 and replies from these organisations dated 4th May 9th April and 29th April – none of this correspondence is appended to the SEA, neither is any response from SODC. SODC comments are reported in four bullet points on page 9 of the SEA. As stated in 1.4 of the SEA the comments on the scoping exercise have been included in this section and addressed.

Section 7 of the SEA is supposed to examine the reasonable alternatives, again this is not transparent. [It does.](#)

Settlement boundary/village boundary – the preferred approach and thus the proposal for “tight settlement boundary” does not meet the basic conditions as it is in conflict with the basic conditions. [The developers appear to believe the ‘settlement boundary’ is within the LnBB development. It is not. A ‘settlement boundary’ certainly does meet basic conditions. Many SODC Neighbourhood Plans have been successfully ‘made’ with settlement boundaries. Establishing a ‘settlement boundary’ is necessary for a parish or land within the Green Belt as NPPF 149 including ‘limited infilling within villages’ as being an exception to inappropriate development in the Green Belt. If the Neighbourhood Plan did not include a ‘settlement boundary’ SODC Planning Officers would take an informal view on where it is, without notification or consultation which may change at any time. The ‘tight’ settlement boundary was included at the suggestion of SODC’s Planning Policy Team Leader \(Neighbourhood\).](#)

Building Heights- the implications of preventing development over 3 storeys (i.e., more land would be needed for the same number of dwellings has not been assessed, if this is the Parish Council’s preferred approach as set out in the NP policies where is the additional land to accommodate development needs? [It has been assessed. There is plenty of land to accommodate development needs. The number of dwelling allocated to Land north of Bayswater Brook in the Local Plan is 1,100 to cover both sites – the Lower Elsfield/Wick Farm site which is the one in question here, and the Bayswater Farm site. The allocation for the Bayswater Farm site is approximately 170 dwelling and to Lower Elsfield/Wick Farm is 930. The developers have indicated they want to increase the dwellings by 55% to 1,450, on the Lower Elsfield/Wick Farm part of the site and now further to 1570 a 69% increase. There is therefore no question that in excess of the number of dwellings allocated to the site in the Local Plan can be accommodated. The Local Plan itself has ‘headroom’ of 5-8,000 homes in excess of established local needs. In addition, building heights in excess of 3-storeys would not be compliant with ENV1 and other Local Plan policies cited within the Neighbourhood Plan. Compliance with Local Plan policies.](#)

NB 4.2. a response from a Wick Farm resident about this very issue of being overlooked and lack of privacy.

The NPPF quoted is incorrect it states –

“13. The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies “. So additional local detail above the strategic policies to shape and direct development are appropriate.

8.4.8. INDIVIDUAL RESPONSES

8.4.8.1 BECKLEY RESIDENT (Full response – Appendix 10.1)

Views from the church and churchyard should be added. Views to and from the church are usually an important viewpoint in Neighbourhood Plans. However, Beckley church cannot be seen from the High Street or many other vantage points as there are a number of trees surrounding it. The church can only be seen well from the top of Church Street, the view on the front page of this Plan. Views from the churchyard and very similar to the views from Church Street and Common Road. Text has been added to Evidence Base 2 to show this.

Lighting the Church - All the policies in this Plan are for future developments and not retrospective. Local residents do enjoy the fact that the church is lit, especially on special occasions. The dark skies policy will not affect lighting of the church. It is to encourage new developments and existing residents when replacing outside lights to produce less light pollution.

8.4.8.2. WICK FARM RESIDENT (Full response – Appendix 10.2)

This is a complaint from a Wick Farm resident about the Land north of Bayswater Brook development and particularly being overlooked and the lack of privacy from the development.

The mitigation policies in the Neighbourhood Plan have tried to address some of these concerns. The response has been sent to the SODC Planning Officer responsible for the LnBB development.

8.4.8.3. MEMBER LOCAL MINISTRY TEAM, THE CHURCH OF ENGLAND PARISH OF BECKLEY (Full response – Appendix 10.3)

A request to add the church as a community into the Neighbourhood Plan.

This is an egregious omission from the Plan and is being added.

8.4.8.4. JPPC RE SANDY ACRE (Full response – Appendix 10.4)

Writing on behalf of their clients to include Sandy Acre, Woodperry Road within the settlement boundary.

The rationale for the settlement boundary has been expanded at the suggestion of SODC. Its purpose is set out clearly in the Neighbourhood Plan.

APPENDICES

APPENDICES REGULATION 14 FIRST CONSULTATION

APPENDIX 1. STATUTORY CONSULTEE RESPONSES	43
APPENDIX 2. LOCAL PLANNING AUTHORITIES	54
APPENDIX 2.1 RESPONSE OXFORDSHIRE COUNTY COUNCIL	54
APPENDIX 2.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL	58
APPENDIX 2.3. STANTON ST JOHN PARISH COUNCIL	74
APPENDIX 3. NATIONAL CONSULTEES AND NHS	75
APPENDIX 3.1. NATURAL ENGLAND	74
APPENDIX 3.2 THE ENVIRONMENT AGENCY	81
APPENDIX 3.3. HISTORIC ENGLAND	82
APPENDIX 3.4. MARINE MANAGEMENT ORGANISATION	87
APPENDIX 3.5. OXFORDSHIRE CCG	90
APPENDIX 3.6. NATIONAL GRID	97
APPENDIX 3.7. SPORT ENGLAND	100
APPENDIX 3.8. BBOWT	103
APPENDIX 3.9. BLUE CEDAR HOMES	108
APPENDIX 4.1. INDIVIDUAL RESPONSES x 18	109
APPENDIX 5. MINUTES FROM THE PUBLIC MEETING	127

APPENDICES REGULATION 14 AND SEA SECOND CONSULTATION 130

APPENDIX 6. LIST OF CONSULTEES	131
APPENDIX 7. LOCAL PLANNING AUTHORITIES	137
APPENDIX 7.1 – RESPONSE OXFORDSHIRE COUNTY COUNCIL	137
APPENDIX 7.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL	143
APPENDIX 8. NATIONAL CONSULTEES	174
APPENDIX 8.1. NATURAL ENGLAND	174
APPENDIX 8.2. HISTORIC ENGLAND	176
APPENDIX 8.3. NATIONAL GRID	177
APPENDIX 8.4. CPRE	180
APPENDIX 9. LAND OWNERS PEGASUS FOR CHRIST CHURCH	181
APPENDIX 10. INDIVIDUAL RESPONSES	220
APPENDIX 10.1 BECKLEY RESIDENT	220
APPENDIX 10.2 WICK FARM RESIDENT	221
APPENDIX 10.3 LOCAL MINISTRY CHURCH OF ENGLAND	222
APPENDIX 10.4. JPPC - RE SANDY ACRE	223

APPENDIX 1. STATUTORY CONSULTEE RESPONSES

BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION 1.12.17-24.2.18							
Statutory consultation bodies	Organisation	Email address (Individual e-mail addresses removed)	Sent	E- mail Deliv ered	E- mai l Cha sed	Resp onse date	Res pon se App endi x Nu mbe r
(a) where the local planning authority is a London borough council, the Mayor of London;	n/a						
(b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Oxfordshire County Council Update Local Planning Authority and neighbouring authority Update ward member(s) Update Town / Parish Council - neighbouring and within		Sent 4.12 .17	✓	21. 2.1 8	23.2. 18	2.1
	South Oxfordshire District Council	planning.policy@so uthoxon.gov.uk	Sent 4.12 .17		21. 2.1 8	14.2. 18	2.2
	Vale of White Horse DC	Planning.policy@w hitehorsedc.gov.uk	Sent 4.12 .17	✓	21. 2.1 8	NON E	
	Cherwell District Council	planning@cherwell -dc.gov.uk	Sent 4.12 .17	✓	21. 2.1 8	NON E	

	Launton & Otmoor Councillors	Cllr Timothy Hallchurch	Sent 4.12.17	v	21.2.18	NON E	
		Cllr Simon Holland	Sent 4.12.17	v	21.2.18	NON E	
		Cllr David Hughes	Sent 4.12.17	v	21.2.18	NON E	
	Forest Hill & Holton Councillor	Cllr John Walsh	Sent 4.12.17		21.2.18	NON E	
Local Parish Councils							
Islip		clerkislippc@hotmail.co.uk	Sent 4.12.17	v	21.2.18	NON E	
Woodeaton			Sent 4.12.17		21.2.18	NON E	
Noke		nokeparishmeeting@gmail.com	Sent 4.12.17		21.2.18	IN ON LINE RESP ONSE S	
Elsfield			Sent 4.12.17		21.2.18	NON E	
SSJ		stantonstjohnpc@gmail.com	Sent 4.12.17		21.2.18	23.2	2.3

			Sent 4.12 .17		21. 2.1 8		
Forest Hill		foresthillwithshotoverpc@gmail.com	Sent 4.12 .17		21. 2.1 8	NON E	
Horton cum Studley		hortoncumstudleyparishcouncil@gmail.com	Sent 4.12 .17		21. 2.1 8	NON E	
			Sent 4.12 .17		21. 2.1 8		
Oxford City Council		planning@oxford.gov.uk	Sent 4.12 .17	√	21. 2.1 8	NON E	
		-					
		-					
(c) the Coal Authority(1);	The Coal Authority	planningconsultation@coal.gov.uk	Sent 4.1 2.1 7	√	21. 2.1 8	NO NE	
(d) the Homes and Communities Agency(2);	Homes and Communities Agency	mail@homesandcommunities.co.uk	Sent 4.1 2.1 7	√	21. 2.1 8	NO NE	
(e) Natural England(3);	Natural England	consultations@naturalengland.org.uk	Sent 4.1 2.1 7	√	21. 2.1 8	23.2 .18	3.1

(f) the Environment Agency(4);	Environment Agency	planning_THM@environment-agency.gov.uk	Sent 4.1 2.1 7	√		10.1. 18	3.2
(g) the Historic Buildings and Monuments Commission for England	Historic England	e-seast@historicengland.org.uk	Sent 4.1 2.1 7		21. 2.1 8	23.2 .18	3.3
(h) Network Rail Infrastructure Limited (company number 2904587);	Network Rail	assetprotectionwestern@networkrail.co.uk	Sent 4.1 2.1 7		21. 2.1 8	NO NE	
		townplanningwestern@networkrail.co.uk	Sent 4.1 2.1 7		21. 2.1 8	NO NE	
(i) a strategic highways company - any part of whose area is in or adjoins the neighbourhood area; (ia) where the Secretary of State is the highway authority for any road in the area of a local planning authority any part of whose area is in or adjoins the neighbourhood area, the Secretary of State for Transport;	Highways England	info@highwaysengland.co.uk	Sent 4.1 2.1 7	√	21. 2.1 8	NO NE	
(j) the Marine Management Organisation(6);	Marine Management Organisation	consultations.mmo@marinemangement.org.uk	Sent 4.1	√		4.12 .17	3.4.

			2.1 7				
(k) any person - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	EE	public.affairs@ee.co.uk	Sent 4.1 2.1 7		21.2.18	NO NE	
	Three		Sent 4.1 2.1 7		21.2.18	NO NE	
	EMF Enquiries - Vodafone & O2	EMF.Enquiries@ctil.co.uk	Sent 4.1 2.1 7	√	21.2.18		
	BT	btgroup@bt.com	Sent 4.1 2.1 7	√	21.2.18	NO NE	
	BT Group CEO Gavin Patterson		Sent 12.12.17	√	21.2.18	NO NE	
	Gigaclear	info@gigaclear.com	Sent 4.1	√	21.2.18	NO NE	

			2.1 7				
(l) where it exercises functions in any part of the neighbourhood area — (i) a clinical commissioning group established under section 14D of the National Health Service Act 2006; (ia) the National Health Service Commissioning Board; (ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(8); (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(9); (iv) a sewerage undertaker; and (v) a water undertaker;	Oxfordshire Clinical Commissioning Group NHS England	oxon.gpc@nhs.net	Sent 4.1 2.1 7	√		15.1 2.17	
			Sent 4.1 2.1 7	√	21. 2.1 8		
		planning@oxnet.nhs.uk reception.jubileehouse@property.nhs.uk	Sent 4.1 2.1 7	√	21. 2.1 8		3.5
	Thames Water - Developer Services	developer.services@thameswater.co.uk	sent 12. 12. 17	√	21. 2.1 8	NO NE	
	National Grid	landandacquisitions@nationalgrid.com	sent 12. 12. 17	bounced, but see below	21. 2.1 8	5.12 .17	3.6

	National Grid - Amec Foster Wheeler E&I UK (on behalf of National Grid)	n.grid@amecfw.com	sent 12. 12. 17	√	21. 2.1 8		
	SSE Energy Supply	customerservice@sse.com	sent 12. 12. 17		21. 2.1 8	NO NE	
	British Gas	customerservice@britishgas.co.uk	sent 12. 12. 17		21. 2.1 8	NO NE	
(m)voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;	Age UK Oxfordshire	admin@ageukoxfordshire.org.uk	sent 12. 12. 17	√	21. 2.1 8	NO NE	
	SOHA		sent 12. 12. 17	√	21. 2.1 8	NO NE	
(n) bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;	Update on individual basis						

(o) bodies which represent the interests of different religious groups in the neighbourhood area;	Diocese of Oxford		sent 12. 12. 17	√	21. 2.1 8	NO NE	
(p) bodies which represent the interests of persons carrying on business in the neighbourhood area; and	Update on individual basis						
(q) bodies which represent the interests of disabled persons in the neighbourhood area.	Enrych	info@enrych.org.uk	sent 12. 12. 17	√	21. 2.1 8	NO NE	
	Oxfordshire Youth	hello@oxfordshireyouth.org	sent 12. 12. 17		21. 2.1 8	NO NE	
Additional consultees advised to contact (if appropriate to area)					21. 2.1 8		
	Health and Safety Executive	LOCAL.PLANS.CE MHD.5@hse.gsi.gov.uk	Sent 4.1 2.1 7		21. 2.1 8	NO NE	
	Defence Infrastructure Organisation (MOD)	DIOSEE_EPSSG1 a1@mod.uk	Sent 4.1 2.1 7		21. 2.1 8	NO NE	

	The Gardens Trust	consult@thegardenstrust.org	Sent 4.1 2.1 7		21. 2.1 8	NO NE	
	SSA Planning Limited		Sent 4.1 2.1 7		21. 2.1 8	NO NE	
	Didcot Garden Town		Sent 4.1 2.1 7	√	21. 2.1 8	NO NE	
	Sports England		Sent 4.1 2.1 7	√	21. 2.1 8	5.12 .17	3.7
				√	21. 2.1 8		
					21. 2.1 8		
	Plant Protection	plantprotection@uk.ngrid.com	Sent 4.1 2.1 7	√	21. 2.1 8	NO NE	

	Council for Protection of Rural England	info@cpre.org.uk	sent 12. 12. 17	✓	21. 2.1 8	NO NE	
	CPRE Oxfordshire	administrator@cpreoxon.org.uk	sent 12. 12. 17	✓	21. 2.1 8		
	Bucks, Berks & Oxon Wildlife Trust - BBOWT	-	sent 12. 12. 17	✓	21. 2.1 8	23.2 .18	3.8
<u>Oxfordshire Disability Groups</u>	https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/socialandhealthcare/peopledisabilities/general/disabilitydirectory.pdf	-					
	Crossroads - Oxfordshire	care@oxfordshirecrossroads.org.uk	sent 12. 12. 17		21. 2.1 8	NO NE	
	Oxfordshire Community & Voluntary Action	info@ocva.org.uk	sent 12. 12. 17	✓	21. 2.1 8	NO NE	

	Oxfordshire Mental Health Matters - MIND	info@oxford-mentalhealth.or	sent 12. 12. 17		21. 2.1 8	NO NE	
--	--	-----------------------------	--------------------------	--	-----------------	----------	--

APPENDIX 2. LOCAL PLANNING AUTHORITIES

APPENDIX 2.1 – RESPONSE OXFORDSHIRE COUNTY COUNCIL



County Hall
New Road
Oxford
OX1 1ND

Beckley & Stowood Neighbourhood Plan Cttee
Attn: Ginette Camps-Walsh:
camps.walsh@btinternet.com

Director for Planning and Place
– Susan Halliwell

23 February 2018

Copy: planning.policy@southoxon.gov.uk

Dear Ginette

Beckley & Stowood draft pre-submission Neighbourhood Plan

Thank you for your email of 4 December inviting us to comment on your draft neighbourhood plan. The area is entirely in Green Belt and you envisage limited development of infill houses. We note that the emerging South Oxfordshire Local Plan envisages small villages such as Beckley growing by some 5%, which equates to some 13 houses in the plan period of which 7 have already been constructed or committed.

The neighbourhood plan area covers the entire parish and extends to the boundary of Oxford City at Barton Park. As noted within your draft Plan, there is major housing development occurring west of Barton Park (within Oxford City) and there are landowners identifying land for further major developments in the Wick Farm / Bayswater / Lower Elsfield areas (some of which is within your neighbourhood plan area). In preparing your draft plan for submission you will need to include the latest position on the emerging South Oxfordshire Local Plan. Background information which is currently in the draft Neighbourhood Plan could be relegated to a supporting evidence document. The County Council's comments on the South Oxfordshire Proposed Local Plan in November 2017 indicated that further consideration should be given to allocating land for growth to address Oxford's unmet need in locations close to Oxford. Some relevant excerpts of our response are included for your information in the attachment to this letter.

My public health colleagues have made some comments on your draft Plan as set out in the attachment and would be happy to discuss these further if you wish.

Yours sincerely

Attachments

Oxfordshire County Council - Excerpt from County Response to SODC Proposed Submission Local Plan

Para 20: The County Council's comments at earlier stages indicated that there may be a need for other site allocations close to Oxford. Apart from the redevelopment of Wheatley Oxford Brookes for 300 houses, the sites proposed are not particularly close or convenient to Oxford. The Oxfordshire Growth Board in its strategic spatial options analysis assessed sites at Grenoble Road, Wick Farm and Thornhill as potentially suitable for addressing Oxford's unmet need. The County Council itself has put forward a landholding at Guydens Farm on the B480 and Oxford Road close to the Eastern Bypass and Grenoble Road, and is seeking that land in that area be allocated. Please see our separate County Council Property and Facilities response for further detail on this. Sites close to Oxford could be well connected to Oxford's key employment locations and the City centre and help to deliver the Oxford Transport Strategy. Such sites would build on existing public transport and other infrastructure capacity and help fund the delivery of planned transport investment in Rapid Transit corridors and cycling and walking improvements.

Para 21: Planning for Oxford's unmet need should not be done in isolation of the spatial implications of the housing number. The spatial strategy fails to recognise the implications of providing for the significant number of people who will need to commute into Oxford. In the absence of allocations which are close or easily accessible to Oxford, there is likely to be an increase in long distance commuting by private car, adding pressure to the already congested highway network in and around Oxford.

Para 22: Other Oxfordshire emerging local plans identify sites for Oxford's unmet need in specific locations where there is access to existing, or planned, fast and frequent public transport links (Rapid Transit), and cycling and walking links to the City centre and key Oxford employment locations and/or where development will strengthen the business case for strategic infrastructure. The County Council does not accept that Green Belt is an absolute constraint as exceptional circumstances are being justified in other circumstances, including within South Oxfordshire at Berinsfield and Culham. The locations that other Districts have put forward are:

- Cherwell: Sites to be removed from the Green Belt in North Oxford, A44 corridor, South and South East of Kidlington;
- Vale of White Horse: Sites in the Abingdon and Oxford Fringe Sub-area, including sites removed from the Green Belt through Local Plan Part 1 and Dalton Barracks which is proposed to be removed from the Green Belt through Local Plan Part 2;
- West Oxfordshire: Sites at Eynsham Garden Village adjoining the Green Belt and West Eynsham.

Para 23: The Proposed Submission Local Plan Policy STRAT3 includes a proposal to undertake a Partial Review of the Local Plan on adoption of the Oxford Local Plan (para 4.28). Policy STRAT3 does not commit to when a partial review would be completed. The County Council considers that a partial review may not be an effective way forward,

particularly given that proposals are being developed for a Joint Spatial Plan. Instead, to make the Plan sound, the joint work undertaken through the Oxfordshire Growth Board strategic work programme on Oxford's unmet need should be referred to, and modifications should be prepared after consideration of additional sites.

Soundness Issue 4 – The plan has not been positively prepared in addressing the needs of the neighbouring Oxford City and its likely unmet need. Further work is required to assess the potential for site allocations which are close and accessible to Oxford City in order to encourage sustainable journeys and reduce air pollution. Policy STRAT3 should be consequently amended as the housing sites will be identified and a partial review will not be needed.

Oxfordshire County Council - Public Health Comments

The vision and objectives are not clearly defined and whilst some of the issues raised have significant public health implications, 'health and wellbeing' are not specifically mentioned. To help make the case for interventions in the built environment that enable and influence the entire population to make healthier choices, we recommend that the vision and objectives clearly make the case for development that improves the health and wellbeing of people living, working and visiting Beckley and Stowood. This is supported by NPPF paragraphs 7, 17 and 171.

An overview of current data on the health and wellbeing status and needs of people living in the Forest Hill and Holton ward which includes Beckley and Stowood can be found using Public Health England's Local Health tool: http://www.localhealth.org.uk/GC_preport.php?lang=en&s=125&view=map13&id_rep=r03&selld0=6096&nivgeo=ward_2016 Oxfordshire's Joint Strategic Needs Assessment (JSNA) provides information about Oxfordshire's population and the factors affecting health, wellbeing, and social care needs and includes a section on the natural and built environment: <http://insight.oxfordshire.gov.uk/cms/joint-strategic-needs-assessment>

Key public health points to highlight throughout the plan would include encouraging the development of an environment which:

- *provides opportunities for people to be more active* – whilst we strongly support the initiative to encourage park and stride from the Abingdon Arms car park to the primary school, we are concerned that the design guide in Section 3 Policies does not set out how development will encourage walking and cycling for local journeys. Discouraging street lighting as set out in section 5.1.2 of the design guide could result in less people walking and cycling particularly amongst more vulnerable groups, such as children, older people and disabled people. This provision could also be used to support retention/improvements to footpaths, playing fields and children's play facilities.
- *provides opportunities to make healthier food choices* - this could be used to support plans for a café and sale of 'daily essentials' from the Abingdon Arms. Consideration could also be given to facilitating local food growing opportunities e.g. encouraging the provision of allotments, community orchards and houses with gardens.

- *fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness* – this could be used to support the multifunctional community roles of the Abingdon Arms and Beckley Village Hall and the building of smaller houses that are affordable to local people/enable older people to downsize and stay in the village. Creating an environment that allows people to be more active will also protect and enhance mental health and wellbeing.
- *enables people to maintain their independence for longer* – although it is recognised that the population is ageing the plan and design guide make no reference meeting the needs of either current or future residents. We recommend that consideration is given to specifying accessible and adaptable homes that meet 'Lifetime Homes' standards and public realm that considers the needs of older/disabled people, such as step free access, publically accessible WCs, benches and the replacement of footpath stiles with accessible gates.

The above are supported by NPPF paragraphs 7, 17, 35, 50, 69, 70, 156 and the PPG 'Health and Wellbeing' chapter.

To maximise the behavioural change potential of active travel infrastructure and the community value of high quality indoor and outdoor public spaces, we recommend that the early phasing of such infrastructure is highlighted within the plan. People moving into new developments are more likely to adopt healthier day-to-day lifestyle habits when health enabling infrastructure such as, walkways and cycle paths, community buildings, play areas and green space, is already in place. This is supported by NPPF paragraph 177.

APPENDIX 2.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL

Planning services

HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading

By email only:

Contact officer: Ricardo Rios

14 February 2018

Dear Ginnete,

Beckley and Stowood Neighbourhood Development Plan - Pre-Submission Consultation

Thank you for giving the Council the opportunity to comment on your NDP.

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

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

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

No.	Policy	Comments/suggestion
1	General comments	<p>Helpful that evidence is referenced throughout. I commend you on the amount of work that has gone into the draft plan.</p> <p>Suggest putting policy in boxes to make it clear what is policy and what is not. See Dorchester NDP the structure was commended by the examiner.</p> <p>The NPPG says that NDP's should contain a justification/rationale for the policies. See Dorchester NDP for how they have structured this. Stroud town centre plan also does this succinctly.</p> <p>Have a look at the Locality guide to writing policy here.</p>
2	<p>5.1.1. Development Site Criteria</p> <p>In addition to National Planning Policy Framework, Green Belt Planning Guides, The South Oxfordshire District Council's Core Plan and Emerging Local Plan 3032 future development sites within the Neighbourhood Plan Area of Beckley and Stowood Parish must comply with the following criteria - (The evidence based for each criterion is copied below it.)</p> <ul style="list-style-type: none"> • There must be no development on green field sites in line with Green Belt Planning Guidelines • Infilling is acceptable – "The filling of a small gap in an otherwise built up frontage or other site with settlements where the site is surrounded by buildings" SODC Core Strategy 	<p>General: Suggest you split the criteria up and make them into separate policies.</p> <p>Pre-amble: In your policies – say to what type of development the policy relates – all development or new development etc. Check - Is there repetition with Local Plan/NPPF? Is the policy adding anything new to the existing policy of the development plan?</p> <p>First bullet point Suggest removal of this bullet point as it does not/cannot add anything that is not already in national/district policy. Green Belt policy is very restrictive already – development is inappropriate in the Green Belt apart from some exceptions.</p> <p>Infilling Suggest delete this point as it does not add to the existing development plan. This definition and the acceptability of infill is already contained in the</p>

<ul style="list-style-type: none"> • Views from public places both to and from the village should be protected. New development that does not detract from the view of the skyline would be preferred. • Developments should provide adequate parking spaces to meet residents' needs, to ensure that as far as possible parking on the road is unnecessary. • A review of flood risk, including springs and water run-off is required for potential development sites. • Gardens are a very important feature in Beckley and provision of a garden in proportion to the house size is an important criterion to the character of the village. • Minimising paved and hard standing areas is strongly encouraged to minimise flooding and run off – please see the Royal Horticultural Society [RHS] 'Front Garden Guide for advice on minimising water runoff from your front garden by reducing hard standing in favour of porous driveways and planting¹ and their advice on the 10 best plants for driveways. • Building of smaller houses is encouraged to help to ensure that local people have the opportunity of affordable housing or to downsize and stay in the village and maintain the vibrancy and vitality of the village. 	<p>Districts development plan. You do not need to duplicate what is in the development plan already.</p> <p>Views bullet point This point needs more clarity; suggest you create a separate policy with a summary appendix that reads:</p> <p><i>'Development proposals should preserve the views and vistas as shown in the schedule and maps at Appendices [X] Subject to the provisions of other policies in this Plan development proposals will be supported where they demonstrate how they have taken account of the various views and vistas and the contribution that they make to the character of Beckley village and the Oxford skyline as appropriate.'</i></p> <p><i>(In Appendices [X] add a schedule of the views shown on the maps including the aspect of character to which they contribute.)</i></p> <p>Parking Parking is unlikely to be applicable to all development sites. Worth specifying what type of development it applies to – new development (residential, employment etc.)</p> <p>Consider making parking a separate policy and including a justification before the policy. Suggest policy reads similar to one in Dorchester plan which has passed examination: <i>'Proposals for new houses in the Beckley should provide the appropriate number of car parking spaces to development plan standards unless it can be demonstrated that such provision is either impracticable to deliver or would detract from the character and appearance of the village.'</i></p>
--	---

	<p><i>In circumstances where development plan car parking standards cannot be met the planning application concerned should include measures to mitigate the consequential impact of additional on-street car parking’.</i></p> <p>Flooding is unlikely to be applicable to all development sites and types of development. You need to specify what kind of development in the policy. Look at SODC’s validation checklists. Flood risk assessment is only required in areas of flood risk. In addition, a flood risk assessment is only required for certain types of development. You will need a firm justification on why to include a new validation requirement where there isn’t one already.</p> <p>Suggest you make a separate policy that is locally specific and focuses on mitigation measures for areas where flooding, particularly surface water flooding, is an issue in the village. You could combine this with the bullet point about hardstanding/paved areas and planting – e.g. using sustainable urban drainage (SUD’s) is encouraged to help prevent flooding.</p> <p>Gardens – This reads as guidance rather than a policy/criteria. It could be supporting text to a policy on character, a separate policy or could be included in a general policy about preserving the character of Beckley.</p> <p>It is not relevant to all types of development so clarify which types – e.g. new residential development.</p> <p>The policy needs to be clear what type of development this applies to and what the policy intends to do. What is the proportion that is most in character with the village – does the character assessment discuss this?</p> <p>Minimising paved/hard standing This could be included in a policy about flood mitigation. You could suggest planting as a form of mitigation – e.g. the planting of xyz to mitigate the impacts of development to [character/flooding] are particularly encouraged. I suggest leaving out of the policy itself reference to the Royal</p>
--	--

		<p>Horticultural society standards, however you could mention it in supporting text for the policy.</p> <p>Smaller houses Make a separate policy. Policy is fine in the way it is written but may need stronger justification.</p> <p>Do you have a housing needs assessment to support it? We encourage you to look at the MyCommunity guidance on how to conduct a housing needs assessment. MyCommunity can also offer support in carrying these out.</p> <p>Note that surveys provide a snapshot in time and are not reliable evidence to justify a policy long-term.</p>
3	<p>5.1.2. Beckley and Stowood Design Guide Environment The Village draws much of its physical character from its rural location and from its Green Belt designation. This is of great value and should be strenuously preserved for the long term.</p> <p>Items of special note and worthy of protection are:- (The evidence based for each criterion is copied below it.)</p> <ol style="list-style-type: none"> 1. The views from the village and from all the approach roads northwards over Otmoor and adjacent farmland, towards Brill and towards Didcot. 2. The views into the village, particularly from the north, to the Church and conservation area. 3. The openness of the farmland and the associated groups of trees and hedgerows and other small fields, paddocks and large rear gardens. 	<p>The introduction and points 1, 2 and 3 reads as explanatory text rather than a policy – Whilst it explains what is valuable to the local community in point 1, 2 and 3, it is questionable whether these points are necessary as they are already included elsewhere, either in this plan (points 1 and 2 are in the development site criteria – see comment 2) or the NPPF (point 3).</p> <p>Points 4, 5 and 6 then give direction like a policy. The way the introduction to the policy is worded does not fit with these points.</p> <p>Point 4 is overly prescriptive and unduly onerous. Suggest you turn into a policy such as:</p> <p>Residential development will be supported where it preserves or enhances the contribution of front and rear gardens to the open character of the village.</p> <p>Point 5 – fine. Suggest wording as:-</p>

	<p>4. Front gardens must be preserved and should not be taken solely up for the parking of vehicles. Guidelines are available from the Royal Horticultural Society on planting guides for front gardens and driveways (see 20 and 21 over page).</p> <p>5. Power cables should be located underground, not overhead.</p> <p>6. Additional street lighting will be discouraged.</p>	<p>Locating power cables underground (instead of overhead) is encouraged in order to preserve the character of the village.</p> <p>Point 6 – This could be a policy similar to one in the Dorchester NDP (which has passed examination):</p> <p>New residential development will be supported where it does not introduce additional street lighting, the road layout being designed in a way that follows the traditional 'lane' type found elsewhere in the village with raised kerbs and few pavements.</p> <p>Where lighting is required, such development will be supported where this is sensitively located and designed in such a way as to limit light pollution.</p>
4	<p>Traffic and Parking</p> <p>Developments which increase the quantity of traffic and car parking, particularly in the Village centre will not be encouraged. Grass verges on the road frontage of dwellings are an important feature of the village and should be protected, preserved and encouraged as far as possible.</p>	<p>Traffic and parking is already mentioned earlier in the policies. See section in comment 2 on parking.</p> <p>Grass verges – Think about what issues you are addressing – how does new development impact grass verges negatively/positively. Who owns grass verges and is responsible for them.</p> <p>Suggest possible wording could be - Where applicable new development should preserve grass verges as far as possible.</p>
5	<p>BECKLEY DESIGN GUIDE</p> <p>In cases where an acceptable and reasonable case has been made for development the design of extensions and new buildings will be expected to comply with the following guidelines: -</p>	<p>Pre-amble: Suggest you use similar wording as the SODC design guide – about encouraging good design.</p>

<p>1. Views from public places both to and from the village should be protected. New development that does not detract from the view of the skyline would be preferred.</p> <p>2. Buildings should always be compatible with the size and character of their neighbours, and in the Conservation Area should generally be built of natural stone.</p> <p>3. Access should be provided between any part of a building and the boundary with its neighbours and space between houses should be maintained as it is an important aspect of the village.</p> <p>4. Building heights should be restricted to be in keeping with surrounding houses.</p> <p>5. No building should be designed so that its height, massing and general scale is over dominant or intrusive over its neighbours.</p> <p>6. Buildings should seek to preserve the daylighting, amenity and privacy of neighbours. i.e. as far as possible not overshadowing, overbearing or overlooking.</p> <p>7. Developments should provide adequate parking spaces to meet resident's needs, to ensure that as far as possible parking on the road is unnecessary.</p> <p>8. Generally, building with local materials including stone will be strongly preferred. Building materials of brick, rendered blockwork, timber or tile cladding and natural stone with roof covering of tiles or slate will be accepted. uPVC and other synthetic cladding materials will be discouraged.</p>	<p><i>"We want to improve the standard of design in developments being delivered in South Oxfordshire [Beckley and Stowood] and to ensure that only developments of the highest quality are delivered in the future."</i></p> <p>Suggest adding that new development has regard to the SODC design guide.</p> <p>The design guide needs to be written as a guide rather than a policy. Suggest the wording is changed to:</p> <p>The design of extensions and new buildings are encouraged to have regard to the following guidelines and those of the SODC design guide: -</p> <p>Point 1 is a repetition of a point in the development site criteria – see comment 2.</p> <p>Point 2: The first part does not add to existing policy in the development plan. Is natural stone the only suitable material within the conservation area?</p> <p>Point 3: This point is a bit unclear – I would advise that the part about access is clarified or left out entirely and instead the point focuses on the contribution to character of spaces between buildings.</p> <p>Point 4, 5, 6: This does not add to existing policy in the development plan. Suggest that it is deleted to avoid duplication.</p> <p>Point 7: See comment 2, this is already included in the plan.</p> <p>Point 8: Fine, so long as this is not a policy. Suggest change "will be" to "are".</p> <p>Point 9, 10: Fine, so long as this is not a policy. Could create a policy about character which includes these points.</p>
---	---

	<p>9. Flat roofs are not regarded as being in character with the rural landscape and will generally be discouraged.</p> <p>10. Large box type dormer windows with flat roofs will generally be discouraged.</p> <p>11. While solar panels on roofs are encouraged these should face the rear of the property, as far as possible.</p> <p>12. Outside lighting on buildings should be fully shielded to direct light downwards to prevent light pollution.</p>	<p>Point 11: Solar panels are permitted development in some cases.</p> <p>Point 12: Fine, so long as this is not a policy</p>
6	<p>5.1.3. Definition of The Village</p> <p>South Oxfordshire [District Council] has not historically defined the edge or boundary of its settlements" and officially SODC Planning Officers state that there is no 'main settlement boundary' for Beckley village.</p> <p>This policy is intended to distinguish between the built-up area of the main village and its surrounding countryside in order to manage development proposals accordingly. In defining the boundary on the Policy Map, applicants and the local planning authority will have certainty when preparing and determining planning applications respectively.</p> <p>This is consistent with a number of Core Strategy and Local Plan policies to encourage sustainable forms of development in the rural areas. Any planning application will be subject to regulations for development in the Green Belt.</p> <p>This Neighbourhood Development Plan for Beckley and Stowood Parish hence 'Defines the Village' to include the whole of the conservation area of Beckley village and an area to the south east of</p>	<p>The policy does not provide a clear indication of how development inside/outside the village boundary should be managed. Settlement/village boundaries normally set out a presumption that development inside the boundary is acceptable and development outside is not. If this is what the policy intends to do it would be in conflict with Paragraph 89 of the NPPF.</p> <p>National policy states that neighbourhood plan policies should be clear and be capable of being implemented consistently. The first part of the policy reads as explanatory text, explaining the intentions behind the policy i.e. to distinguish between the built-up area of the main village and its surrounding countryside (and to manage development proposals accordingly), to provide certainty with regards to what is considered to be the built-up area of the main village and what is not and encourage sustainable forms of development in the rural areas. The second part of the policy defines the boundary and explains/describes what it encompasses, including the Conservation Area. However, there appears to be an internal conflict within the policy as currently written. On the one hand it suggests that sustainable development that is acceptable in built up areas (as defined in the development plan) would be acceptable within the proposed village boundary. On the other hand the policy acknowledges that any</p>

<p>it bounded by Sand Path, New Road and Woodperry Road. This area is to the south east of Beckley village conservation area and includes the bungalows on Roman Way, Sand Path, the north side of New Road, (the road to the transmitter) then running east directly behind the houses of Lombardy and Hollybush House in the track running south from Woodperry Road, along the back-garden boundaries of the existing houses to the east in Woodperry to the back-garden boundaries to the east of Bungalow Close. To the north it is bounded by Woodperry Road. Please see the Policy Map over the page.</p>	<p>proposals would be subject to Green Belt restrictions. This would result in most forms of development being deemed inappropriate.</p> <p>This lack of clarity and potential conflict with Paragraph 89 of the NPPF puts this policy at a great risk of failing to meet basic conditions.</p> <p>The location of Beckley within the Green Belt makes the starting point for an assessment of this policy against national Green Belt policy. Section 9 of the NPPF is devoted to the government's approach towards protecting Green Belt land. Paragraph 79 comments that <i>'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'</i>.</p> <p>Paragraph 86 states that: <i>'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'</i></p> <p>Paragraph 87 of the NPPF consolidates this approach in commenting that <i>'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'</i>. Paragraph 89 comments further that <i>'a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt'</i>. It then identifies exceptions to this approach. In relation to this policy one of the exceptions is <i>'limited infilling in villages and limited affordable housing for local community needs under policies set out in the Local Plan.'</i></p>
--	---

	<p>The adopted Core Strategy addresses the overlapping issues in the neighbourhood area of the Green Belt and the identification of Beckley as one of a series of smaller villages. Policy CS EN2 emphasises the importance and spatial extent of the Green Belt together with its strategic function. Policy CS R1 identifies that infill development on sites up to 0.2 hectares (equivalent to 5-6 houses) will be supported together with rural exception sites. It also comments that all developments should respect national designations including Green Belts.</p> <p>Taking all these matters into account, I recommend the removal of the policy. This is because its emphasis/justification should be on restricting development in accordance with national Green Belt policy – the introduction of a village boundary would normally suggest development is acceptable within the boundary and be contrary to this. Whilst the distinction between the two approaches may be subtle it gets to the heart of Green Belt policy in paragraph 89 of the NPPF where housing is regarded as inappropriate development subject to clearly-defined exceptions.</p> <p>At the moment, the village boundary policy says that it is there to distinguish between the built-up area and open countryside. However, as proposed, it includes large areas of green space and residential buildings that are sparsely located and not closely related to the main built up area. The fact that the village is washed over by Green Belt is noteworthy in the fact that the village itself needs to retain its openness see para 86 of the NPPF. These sparsely located residential buildings that are separated from the main built-up area by fields create an important transition between the open countryside and Beckley village.</p> <p>----- After discussing the matter further with you:</p> <p>Having had the opportunity to discuss the matter further, it is clear that you wish to go ahead with including a village boundary policy in the plan.</p>
--	--

		<p>It is understood that the policy aims to define what the village/settlement is with respect to policy CSR 1 and its definition of infilling "Infill development is defined as the filling of a small gap in an otherwise built-up frontage or on other sites within settlements where the site is closely surrounded by buildings." The policy intends to make clear where policy CSR 1 applies by defining where the settlement is, so it is no longer a matter of planning judgement but a decision made by people in the village.</p> <ul style="list-style-type: none"> • This approach still carries the risk of not meeting the basic conditions as this policy would be setting a principle for development within policy in locations where there currently is not one without having followed a clear methodology and a robust process. • The policy makes a decision that will need to be assessed through a Strategic Environmental Assessment as the plan covers an environmentally sensitive area containing listed buildings and a conservation area. • The methodology chosen to create the village boundary needs to be clearly stated and justified within the supporting text of the policy. • We suggest that, if a boundary is to be included in the plan, that the decision as to where to draw it should be subject to a rigorous process and methodology, including a strategic environmental assessment (SEA). This is because, it would be introducing a new policy into the development plan that has not been tested by the SEA/SA of the higher order plans. • We also suggest making the policy clearer, currently, it says that it is there to distinguish between the built-up area and the open countryside. If this is the case, then we suggest a tighter boundary
--	--	--

		<p>be drawn using a clear and tested methodology. There are currently large areas of garden, particularly in the conservation area that the policy is denoting as built-up area, this is inadvisable to include in such a boundary.</p> <p>Since, in our discussions with you, you have said that you do not want the policy to distinguish the built-up area and open countryside. You have suggested that it distinguishes the village only, not where development is acceptable and where it is not, nor where the open countryside begins and the built settlement ends, that it is simply there to answer, "is this plot of land in the village or not?".</p> <p>We are not aware of any examples where such approach has been implemented. We are concerned that the justification for this approach is unclear and not compatible with planning principles and practice. We also have concerns, for the reasons written above, that it would not meet the basic conditions.</p> <p>The policy carries a significant risk of being modified or deleted but it may not necessarily cause the plan to fail. However, including the policy without having carried out an SEA would put the entire plan at significant risk of failing examination. Therefore, if you are to go ahead with the policy, I strongly suggest that you carry out an SEA.</p> <p>If you disagree with the council's screening opinion and would like to re-screen the plan as the 'Qualifying body' to determine for yourselves whether an SEA is required, this option is available to you.</p> <p>Without this policy, we believe it is unlikely that an SEA will be required. This is because none of the other policies have the potential for likely significant effects that have not previously been tested and screened out in the SA of the Local Plan. However, we would have to re-screen the plan to reach this determination.</p>
--	--	---

		<p>Finally, we strongly encourage you to undertake a Health Check of the plan. This would involve someone independent of the Council having a look at the plan and commenting on whether they think it meets the basic conditions. MyCommunity/Locality offer this service for free.</p>
7	<p>5.1.4. Protection of the Peaceful Environment</p> <p>While sport in the Green Belt and in the Parish is encouraged, residents feel that the quiet and peaceful enjoyment of their homes is a value to be preserved. There is already an MOD rifle range at the end of Otmoor Lane and the noise from it can be heard not only across the parish, but also in adjoining ones, depending on the wind direction. There is also a shooting range in New Inn Road, which although much less noisy than the MOD rifle range can be heard nearby. Residents have therefore expressed a wish that no further planning permission should be given to any sport or activity that is likely to cause noise nuisance to neighbours, in order to preserve their enjoyment of the peace and tranquillity of their homes, gardens and the village environment.</p>	<p>This reads as explanatory text and is not a policy as it does not give a clear direction. It works as explanatory text and could be left as such.</p> <p>The introduction to this Policy Section (3) of the plan would need amending to reflect this.</p> <p>Should you wish to make it a policy I would suggest rewording to something similar to Dorchester's policy which has passed examination:</p> <p><i>DoT 14: Peace and Tranquillity</i> <i>All new development should respect and take account of the peace and tranquillity. Any development that gives rise to significant levels of noise and traffic should include measures to mitigate the negative effects.</i></p>
8	<p>5.2. Housing Development Designation</p> <p>It is normal in Neighbourhood Plans, and in fact usually one of the most important outcomes, to designate development sites for the town or village to grow. However, as Beckley and Stowood Parish lie entirely within the Green Belt this is not allowed for new developments.</p> <p>Small villages such as Beckley have been asked to grow by 5% in line with SODC's Local Plan.</p> <p>For Beckley and Stowood this means 13 new houses. However, the date is taken from 2011 and there have already been 7 additional homes either built or planning permission granted,</p>	<p>Suggest you move this section out of the policy section to elsewhere in the plan to avoid any uncertainty about whether it is policy or not. You cannot allocate housing in the Green Belt, nor set a principle for development and this could be interpreted as doing that.</p> <p>This could be moved to Section 1.2.</p>

<p>leaving only 6 additional new homes to meet the SODC Local Plan. In the 'Initial Survey' residents said that they wished to do their bit to increase the housing supply.</p> <p>The Neighbourhood Plan will help to meet the other new developments by –</p> <ol style="list-style-type: none"> 1. Encouraging development of brown field land 2. Encouraging infilling within the 'Defined Village' <p>5.2.1. Brown Field Sites Two brown field sites have been identified for future development and while inclusion in this Plan does not ensure their future development, as this decision must be made by the land owner, it may facilitate it.</p> <p>The two sites are –</p> <ul style="list-style-type: none"> • Wick Farm listed barns which are at risk • Royal Oak Farmyard <p>Wick Farm Barn</p> <p>There is development potential to convert and renovate the large barn at Wick Farm and some of the old farm buildings. There was a planning application in 2012 to convert the large barn behind Wick Farm House into a house³ The application was withdrawn and it is believed that this may have been due to the fact that it was likely to be refused. Conversion of this large barn and other barns would save the buildings and make useful housing or commercial premises. It is the responsibility of owners of listed buildings to keep them in good repair or the local authority can step in with a repair order or intervene to protect buildings. The owners of Wick Farm are encouraged to redevelopment the listed barn to preserve it.</p> <p>Royal Oak Farmyard</p>	
---	--

	<p>Royal Oak Farm no longer runs as a farm, as the land has been sold, but the former farmyard is currently used for a number of small businesses. There was a successful farm shop, but traffic flow at weekends and the evenings on B4027 has diminished making it less attractive for businesses needing passing custom. The area is approaching an acre and there is an existing building, which could be converted into a house and sufficient land for several new houses.</p>	
	RESPONSES FROM INTERNAL CONSULTEES	
	<p>DEVELOPMENT MANAGEMENT</p> <p>Most of the policies look like they were broadly compliant with the development plan and design guide but there the proposal to include a village boundary causes us considerable concern.</p> <p>Whilst the area to the north pretty much follows the boundary of the conservation area and open areas will be doubly protected by the conservation area impact and Green Belt status the highlighted area to the south has never been considered as part of the built up limits of the settlement and residential development within the highlighted areas has been consistently been refused and dismissed on appeal.</p> <p>The village boundary defines the area the parish feel comfortable with new development. This area of land is some 6.5 hectares in area. At a relatively low density of 25dph this would potentially mean land for 162 new dwellings.</p> <p>I do not think that this quantum of growth for a village the size of Beckley is NPPF compliant as it would be way beyond limited infilling and would have a significant and harmful impact on openness of the Green Belt. I do not think the village boundary should include the highlighted area on the plan below. The village should maybe consider allocating an exception site for affordable housing which could include up to 25% of market housing.</p>	



APPENDIX 2.3. STANTON ST JOHN PARISH COUNCIL

Dear Ginette,

Beckley ad Stowed Neighbourhood Plan

Thank you for the reminder to respond to the Plan presentation. Sorry I have left it so late.

I must commend you on your efforts in leading the process on behalf of Beckley Parish and record that I think you have done a great job in taking your team through the process.

The detail comments I have relate only to the Design section of the plan, as you would imagine, and related mainly to the Conservation Area (CA) in Beckley.

Generally I stress the need for a high standard of design which is complimentary to the built environment and can be seen to enhance the visual amenity of the area.

Outside the CA there is less statutory control and one can only recommend, as you have, the avoidance of design solutions which are of poor value e.g.: flat roofs, UPVC replacement fenestration etc.

However, I encourage you to be demonstrative in the CA with detail particularly in the area of 'the street scene' and public visual amenity, where the public gaze and appreciation of the wealth of character in the village is a more corporate responsibility.

A particular matter worth mentioning is work done by official agencies or their contractors such as Highways or Utility Companies covering for example:

- The location, siting, and colour of Meter Boxes,
- Satellite dishes and TV ariels,
- Manhole covers and inspection chambers.

avoiding urbanising and sub-urbanising influences in the village such as:

- concrete kerbing where sets are more appropriate.
- the over-metalling of rural road edging, road paint or urban paving solutions.
- lamp posts, street lighting, wirescapes, telegraph poles, (noting your comment on under grounding) and light scatter.
- a proliferation of street signage and traffic management signage. Fly Posting.
- 'off the peg' footpath guard rails/handrails which are not bespoke solutions where appropriate.

in respect of landscaping:

- use of tarmac/ concrete on driveways where gravel or a permeable finish is less urban and more appropriate.
- sustaining landscaping of verges and protection of soft road edges.
- natural tree planting rather than memorial or parkland amenity statements.

Some of these may be worth you referring to, as you see appropriate, but by and large policy rather than proscription could be better.

With all good wishes,

Andrew Clark.
Stanton St. John.

APPENDIX 3. NATIONAL CONSULTEES AND NHS

APPENDIX 3.1. NATURAL ENGLAND

Date: 23 February 2018
Our ref: 233181

Ginette Camps-Walsh
Chairman Beckley and Stowood Neighbourhood Plan Steering Committee
Beckley and Stowood Parish Council

BY EMAIL ONLY



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

T 0300 060 3900

Dear Ginette Camps-Walsh,

Planning Consultation: Beckley and Stowood Neighbourhood Plan

Thank you for your consultation on the above dated 4 December 2017.

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

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

Beckley and Stowood lies in an area of high biodiversity importance in the County, as recognised in the Neighbourhood Plan both Sydlings Copse and Pond SSSI and Otmoor SSSI lie within the plan area, there are also numerous priority habitats including ancient woodland. Information on the location of these features is available on www.magic.gov.uk. The importance of the area for achieving nature conservation priorities is reflected in the identification of two Conservation Target Areas (CTAs): Otmoor, and Oxford Heights East (more information is available [here](#)); we would recommend that these are also identified within the Neighbourhood Plan.

We note that there are areas mapped as traditional orchard within the area that has been defined as village, these are areas of priority habitat and it would be helpful for the Neighbourhood Plan to confirm their presence and highlight the need to protect such habitats in line with policy in the Local Plan.

We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Particularly given the importance of the Beckley and Stowood area for nature conservation, we would most welcome the inclusion of a development policy in your plan which incorporates wording to ensure that "all development results in a biodiversity net gain for the parish". This could be achieved by securing developer contributions to enhance habitats within the Parish, for instance.

The recently produced [Neighbourhood Plan for Benson](#), in South Oxfordshire provides an excellent example. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplary. We recommend that you consider this document, when reviewing yours.

Natural England have identified Bernwood as a Focus Area for our work, with Beckley and Stowood supporting some of the key biodiversity sites. We would be keen to explore with the Neighbourhood Plan

group what opportunities there may be that could benefit both the local community and wildlife. There are a number of funding sources available for such work, more detail on this and the importance of the Bernwood Focus Area are outlined below. Our Lead Adviser for the Bernwood Focus Area would be pleased to provide further advice and information, she can be contacted at rebecca.pringle@naturalengland.org.uk or 0208 225 6001.

Natural England have now developed Focus Areas around the country where we can target our work strategically and we would like you to be involved. Over the next 20 years, Natural England will be working closely with our partners and local communities to increase and fortify this mosaic of connecting habitats, which underpin the historic environment. Below are some suggestions which you may want to incorporate into your neighbourhood plan which will benefit both your local community and wildlife.

Bernwood Focus Area

Your parish is within the Bernwood Focus Area. Bernwood covers the relics of the ancient royal hunting forest in Oxfordshire and Buckinghamshire, in an approximate triangle between Oxford, Buckingham and Aylesbury encompassing the river Ray and the Thame. The area supports the best population in the country of black and brown hairstreak butterflies which lay their eggs on the thick blackthorn hedgerows weaving between the ancient woodlands and species-rich lowland meadows. The area provides habitat for a number of wading birds and bat species including the rare Bechstein's bat. The area still supports a few isolated pairs of breeding turtle doves which need scruffy arable margins close to large thick hedges in order to survive.

Creating good habitat for bats

A network of woodland, hedges and clean water sources will benefit not only bats but other fauna and flora. For information on how to create ponds for bats, Freshwater Habitats Trust produced an information package alongside Bat Conservation Trust which can be found [here](#). You may want to look at how to incorporate good habitat for bats into gardens as part of your parish's green infrastructure [here](#). Ponds also create sources of fresh water in your community, providing habitat for two thirds of freshwater species and outdoor spaces for the community to visit. More information can be found [here](#).

Managing hedgerows for butterflies

The Bernwood area has a large network of blackthorn hedges, these need to be maintained by cutting every three years rather than annually so that hairstreak butterflies can successfully lay their eggs. You may want to consider creating new species-rich hedgerows and there is the chance to use ancient practises such as hedge laying. More information on management can be found [here](#).

Creating or restoring lowland meadows

Lowland meadow is a declining habitat but is still littered across this part of the UK. Priorities should be to expand the area of lowland meadows by restoring semi-improved grasslands and re-creating lowland meadows on improved grassland and arable land. Where possible, action should be targeted at expanding and linking existing sites. Magnificent Meadows have very useful information [here](#). Consider how to join up habitats to improve connectivity on a landscape-scale for example BBOWT Living Landscape of the [Upper Ray](#).

Ancient woodland

Ancient woodland and veteran trees are an irreplaceable habitat which has heritage and cultural value and provides ecosystem services, such as shade, reduction of flood risk, carbon capture, improved air quality and purification of water. It is preferable to link up fragmented areas by connecting up woodland which would be divided by development with green bridges or tunnels, buffering it by leaving an appropriate zone of semi natural habitat between the development and the woodland, providing wildlife corridors and balancing new developments and residential areas with green infrastructure, allowing space for trees. The Woodland Trust have further information which can be found [here](#).

Creating and enhancing some of these habitats will not only ensure better biodiversity and habitat for rare butterflies, bats, great crested newts but it also provides more clean water in the catchment, increases climate change resilience¹, and improves air quality. Providing natural areas can also

improve both mental and physical health²³ of the people in your parish.

Do you have any environmental projects in mind for your parish? Below are some funds you may be interested in to help enhance your community:

HS2 woodland fund

This enables woodland land owners to restore PAWS (Plantation on Ancient Woodland) or extend existing ancient woodland in a 25 mile radius of the HS2 line. Information on how to apply can be found [here](#).

HS2 Community and Environment Fund

This fund is designed for communities along the HS2 route that are demonstrably disrupted by the construction of Phase One from London to Birmingham. Information on how to apply can be found [here](#).

TOE2 No Net Loss of Biodiversity on the Greater West Programme (Oxfordshire only)

There will be some habitat loss due to Network Rail's improvement of the Greater West Programme. Funding is available for the creation and improvement of similar habitats to those that have been lost, including funds for up to three years aftercare. Information on how to apply can be found [here](#).

Yours sincerely,

Annex A - 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.

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/index.cfm)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 on the natural environment and the need for any environmental assessments.

Landscape

¹ <http://magic.defra.gov.uk/>

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

³ <http://web.archive.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://www.gov.uk/government/publications/national-planning-policy-framework-2>

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

Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

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 and habitat

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees-link to standing advice

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

Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states "*the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible*". Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric¹³ and the environment bank biodiversity impact calculator¹⁴. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

⁹<http://web.archive.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://web.archive.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<https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note: the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

¹⁴<http://www.environmentbank.com/impact-calculator.php>, and http://www.google.co.uk/url?sa=t&rc=j&q=&e=s&source=web&cd=3&ved=0ahUKBwi7vcbIQaDQAhVMDoAKHb8IDEUQFggMAI&url=http%3A%2F%2Fconsult.weiha.gov.uk%2Ffile%2F4184236&usq=AQjCNFb5JIJQ_UNQ044Qe6mILfxclg

Green Infrastructure, Improving Your Natural Environment.

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

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

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

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁵).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Green Roofs

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

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

¹⁵ <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/>

APPENDIX 3.2 THE ENVIRONMENT AGENCY

creating a better place



Ginette Camps-Walsh
Beckley and Stowood Neighbourhood
Plan Steering Committee
Beckley and Stowood Parish Council

Our ref: WA/2006/000324/OR-
40/PO1-L01

Your ref:

Date: 10 January 2018

By email:
Camps.walsh@btinternet.com

Dear Ms Camps-Walsh

Beckley and Stowood Neighbourhood Plan – Pre-submission version

Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for Beckley and Stowood.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Based on the environmental constraints within the area (no main rivers or high flood risk), we have no detailed comments to make in relation to the Plan at this stage. Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

It is not clear whether the plan proposes to allocate sites for development, but we note that the plan mentions potential development at Wick Farm Barn and Royal Oak Farm. We are pleased to see that these sites are both located within Flood Zone 1. This is land assessed as having a less than 1 in 1000 annual probability of river flooding.

The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can compliment other objectives such as enhancing green spaces.

Cont/d..

APPENDIX 3.3. HISTORIC ENGLAND



Cllr Ginette Camps-Walsh
Chairman Beckley and Stowood Neighbourhood Plan
Steering Committee
Beckley and Stowood Parish Council
Royal Oak House
Stowood, Beckley
Oxford OX3 9TY.

Our ref: HD/P5355/
Your ref:

Telephone 01483 252040
Fax

23rd February 2018

Dear Councillor Camps-Walsh,

Beckley and Stowood Neighbourhood Plan Pre-Submission Consultation Draft

Thank you for your e-mail of 19th December 2017 advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments.

The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.

We welcome the very detailed section on the history of Beckley and Stowood, but consider that much of this detail would be better in an appendix to the Plan, with just a summary in the main body of the Plan, focusing on setting the context for the parish today. In fact, the only era missing from the otherwise very comprehensive history is the present day. What is the nature of the historic environment in the parish in the 21st century?

The National Heritage List for England has 46 listed building entries for the parish, one scheduled monument and one Grade II* Registered Historic Park and Garden. Is there a list of locally-important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. Have the Oxfordshire Historic Environment Record and Oxfordshire Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance?



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



The National Planning Practice Guidance states "... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions".

Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We therefore welcome the undertaking of the Character Assessments for the parish and the section on Character and Heritage. However, we consider that perhaps the level of detail from the Assessments included within the main body of the Plan is excessive – this detail could be included in an appendix to the Plan or kept as a separate document with just a summary in the Plan.

We also welcome the reference to the Appraisal of the Beckley Conservation Area (and the Appraisal itself), but consider that it would be helpful to say a little more about the Conservation Area; e.g. when was it designated? Has the designation been reviewed? What is its special interest (the reason for designation)?

We welcome the references to the "Areas for Improvement" identified in the Appraisal, and National Planning Practice Guidance notes that "*Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements*".

However, the Guidance explains "*Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex*". It would be more appropriate therefore for the "Areas for Improvement" to be set out separately from the main body of the Plan.

The section of the Plan on Threats understandably considers what the local community presumably consider to be the most significant threats to the parish; the consideration of Wick Farm as a strategic housing site and the Oxford-Cambridge Expressway. However, whilst it is appropriate, indeed important, for a Neighbourhood Plan to identify and consider issues that impact or will impact on the environment and quality of life of the plan area, the detailed explanation of the Wick Road situation does seem rather excessive in our opinion for the main body of the Plan.

These are both strategic issues and therefore largely outside the remit of the neighbourhood plan. However, we note a list of issues for the Plan have been identified through public consultation. For example, is the condition of heritage assets in the parish an issue?



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



The Well House at Wick Farmhouse is currently on the Historic England Heritage at Risk Register. Also, the Register does not include grade II listed secular buildings outside London. Has any survey been undertaken to ascertain whether any of the Grade II listed buildings in the parish are at risk of neglect, decay or other threats ?

We have noted the "Areas for Improvement" identified in the Conservation Area Appraisal, but has there been any other or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

National Planning Policy Guidance explains that *"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."* We consider that the policies of the Plan could benefit from some redrafting for them to comply fully with this guidance on drafting.

Paragraph 58 of the National Planning Policy Framework states *"...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics."*

Policy 5.1.2 generally satisfies the requirement for a policy regarding the quality of development that will be expected for an area, and the character assessments and Beckley Design Guide provide the "understanding and evaluation of its defining characteristics".

We have concerns over the exhortation in the Plan to the owners of Wick Farm Barn to redevelop the listed barn to preserve it. The Plan is correct that owners of listed buildings are obliged to keep them in decent condition, so there is an obligation on the owner to maintain the barn as it is, without the need for conversion.

The use most sympathetic to the significance (importance) of a listed building is its original use. We would therefore prefer the owner to keep the barn in agricultural use or, if no longer suitable or needed for agricultural use, to consider some form of low-key storage use. Conversion to residential use is usually the most damaging to the significance of a listed barn and should therefore only be considered as a last resort. The fact that a previous application to convert the barn to a house was likely to be refused may suggest that residential conversion is inappropriate.

We would like to see a policy in the Plan specifically presuming in favour of development proposals that conserve and enhance the historic environment. We acknowledge that this is covered at a strategic level by the emerging South Oxfordshire Local Plan, but we consider that a locally-specific policy could be included



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



in the Neighbourhood Plan to “*put broader strategic heritage policies from the local plan into action at a neighbourhood scale*” (National Planning Practice Guidance).

Finally, a couple of general observations. We consider that some of the language used in the Plan is inappropriate for a neighbourhood plan e.g. “*BT has proved remarkably unhelpful and expensive*” (page 11), “*unscrupulous developers*” (page 27) and the references to Oxford City Council and the owners of Wick Farm (pages 28 and 29). Historic England would not wish to be associated with such language by supporting the Plan in its entirety as currently drafted.

Also, the preparation of the Neighbourhood Plan offers the opportunity to harness a community’s interest in the historic environment by getting the community to help add to the evidence base, perhaps by inputting to the preparation or review of a conservation area appraisal, the preparation of a comprehensive list of locally important buildings and features, or a survey of Grade II listed buildings within the Plan area to see if any are at risk from neglect, decay or other threats. We would be pleased to advise further on these.

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Beckley and Stowood, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours sincerely,

Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

Appendix: Sources of Information

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.historicengland.org.uk>

Heritage Gateway: includes local records of historic buildings and features
www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment <http://hc.historicengland.org.uk>

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/> has information on neighbourhood planning and the historic environment .

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment.
www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever.
<http://risk.historicengland.org.uk/register.aspx>

Placecheck provides a method of taking the first steps in deciding how to improve an area.
<http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing,
<http://www.historicengland.org.uk/publications/known-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information.
<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by Historic England, uses good practice to support the creation and management of local heritage lists.
<http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies
<http://www.helm.org.uk/server/show/nav.19604>

Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place
<http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



APPENDIX 3.4. MARINE MANAGEMENT ORGANISATION

From: Consultations (MMO)<Consultations.MMO@marinemanagement.org.uk>

Sent: 04 December 2017 11:21

To: Ginette Camps-Walsh <camps.walsh@btinternet.com>

Subject: Consultation response- PLEASE READ

Thank you for including the 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

Response to your consultation

The Marine Management Organisation (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 European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England 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 mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the [East Inshore and Offshore marine plans](#) were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our [Marine Information System](#). The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) 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 NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions –

including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – 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 0300 123 1032.

APPENDIX 3.5. OXFORDSHIRE CCG



Oxfordshire
Clinical Commissioning Group

Ginette Camps-Walsh,
Chairman, Beckley & Stowood
Neighbourhood Plan Steering
Committee
Oxfordshire
Email: camps.walsh@btinternet.com

Jubilee House
5510 John Smith Drive
Oxford Business Park South
Cowley
Oxford
OX4 2LH

Telephone: 01865 336717

15 December 2017

Dear Ginette

Re: Neighbourhood Plans – Beckley & Stowood 2017

The CCG commissions Primary Care services to all residents in Oxfordshire.

With the large scale housing developments planned across the District the CCG would like to make the following comments on your Neighbourhood Plan:

Any large scale housing development, notwithstanding the cumulative effect of smaller sites, will have a direct impact on our local health services, in particular the local GP's.

If the local GP practice is able to grow and expand to support the housing growth the CCG would look to both the Parish Council and the Local Planning Authority to consider supporting this new population by negotiating developer contributions. Where expansion of the existing GP practice is not viable the CCG will need to consider its options to ensure Primary Care services are available to the new population.

We note that residents at Beckley and Stowood and surrounds are supported by a number of practices, and that the population has a high proportion of elderly residents in the area.

We would welcome a reflection within the Neighbourhood Plan that any impact from housing would have a corresponding impact on the practices' ability to support their existing population. This is particularly the case with any Care Home development or Extra Care Housing, which requires considerable health input.

Transport to and from the surgeries can also be an issue, and rural loneliness a health factor. Good digital connectivity can help support remote monitoring for house bound patients.

The CCG is very keen to work closely with the Neighbourhood plans and we have a co-ordinator in your area: **Julie-Anne Howe** who can be contacted on planning@oxnet.nhs.uk.

Below is a paper prepared for the OCCG Board, which details our health needs associated with any housing development, should it go ahead.

Please do contact us if we can provide further information and support. We look forward to working with you.

Yours faithfully

Senior Commissioning Manager, Locality Co-ordinator
City and North East Localities



Health needs associated with Housing growth

1. Introduction

The link between planning and health is long established. The planning system has an important role in creating healthy communities; it provides a means both to address the wider determinants of health and to improve health services and infrastructure to meet changing healthcare needs. Consultation between District Councils (as Local Planning Authorities (LPAs)), public health and health organisations is a crucial part of the process.

The Oxfordshire Strategic Housing Market Assessment (2014) concluded that 93,560 – 106,560 additional homes will be needed across Oxfordshire in the period 2011 – 2031. Assuming an occupancy rate of 2.3 people per new dwelling, this equates to an additional population of 215,000 – 245,000 people, or a 35% increase from the 2011 census baseline.

NHS Property Services have estimated that an additional 128 WTE GPs and over 16,000 square metres of GP floor space would be needed to cope with this level of population growth (assuming the mid-point of the growth estimate). Given the current financial position of the NHS it is difficult to see how this will be delivered without either securing funding or infrastructure from the developers building the homes or accessing other sources of funding available to meet the demands associated with significant growth.

The sums of money potentially available are significant. Based on the mid-point of expected growth and calculations included later in this report, the level of housing expected in Oxfordshire could generate in the region of £230 million for primary care facilities from developer contributions. Depending on the size of the development, valuable land could also be made available for new healthcare premises.

This paper provides an overview of where housing growth is expected, Section 106 planning obligations and the Community Infrastructure Levy; outlines the steps that need to be taken to put the CCG in a stronger position to influence and realise opportunities in relation to housing and population growth; progress to date; and a suggested approach to securing funding and infrastructure.

2. Location of Housing Growth in Oxfordshire

Oxfordshire County Council has recently prepared a note in which they outline the expected level of growth for each district and likely locations within districts (see appendix X). In summary this is as follows:

	Local Plan Total	Nos. Built 2011/16	Yet to be Built by 2031
Cherwell	27,240	3,031	24,209
Oxford	10,762 Min.	1,371	9,391 Min
SOxon	19950	2,732	17,220
Vale	22,760	3,065	19,695
WOxon	15,950	1,464	14,486

* figure not agreed by SODC

3. Section 106 Planning Obligations

Section 106 of the Town and Country Planning Act 1990 (as amended by Section 12 of the Planning and Compensation Act 1991) outlines the power of a LPA to enter into a Planning Obligation with anyone having an interest in land in their area. Health is listed as one of the main service areas where monies are received through the use of Section 106 planning obligations (S106).

It is a legal requirement for planning obligations to meet the following three tests:

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

S106 funding is available for capital projects only. Revenue funding towards on-going running costs is not available.

S106 agreements can be used to allow the following improvements to health facilities:

- the expansion of existing premises
- new premises
- new facilities required to compensate for the loss of a health facility caused by the development

NHS Property Services has recently advised West Kent Clinical Commissioning Group that the sum to be requested for health under S106 should be based on a

calculation consisting of occupancy x number of units in the development x £360, as set out below. This calculation was approved by the West Kent CCG Board in August. It would be reasonable to assume that the same calculation could be used for Oxfordshire.

Size of unit	Occupancy assumptions based on size of unit	Health need / sum requested per unit
1 bed unit	1.4 persons	£504 per 1 bed unit
2 bed unit	2.0 persons	£720 per 2 bed unit
3 bed unit	2.8 persons	£1,008 per 3 bed unit
4 bed unit	3.5 persons	£1,260 per 4 bed unit
5 bed unit	4.8 persons	£1,728 per 5 bed unit

NHS Property Services also advised that if the planning application doesn't specify the unit sizes in the proposed development, the average occupancy of 2.8 persons is used in the initial health calculation until such time as the size of the units are confirmed at which point the final costs/health calculation would be confirmed. For example if the proposal was for a 400 dwelling development the initial calculation would be – 2.8 persons x 400 dwelling units x £360 = £403,200.

NHS Property Services also provide advice on the indicative square meterage calculations historically used to determine the core GMS space required for a practice. Details are set out in the table below.

No. of patients	2,000	4,000	6,000	8,000	10,000	12,000	14,000	16,000	18,000	20,000
Type of Premises	A	A	B	B	B	B	B	B	B	B
Gross Internal Area Allowance	199	333	500	667	833	916	1,000	1,083	1,167	1,250

Note: Type A assumes a single storey premises

Type B assumes a two storey premises with one staircase and one lift

Source: NHS Property Services Demand Assessment Tool

4. Community Infrastructure Levy

The Planning Act 2008 introduced the Community Infrastructure Levy (CIL). CIL will replace S106 planning obligations for many forms of infrastructure, although S106 agreements can still be used for site specific mitigation measures.

CIL is becoming the preferred method for collecting pooled developer contributions to fund infrastructure and all LPAs are expected to move to CIL. The LPAs in Oxfordshire are at varying stages of introducing CIL, with consultations on CIL charging schedules taking place as processes are developed to enable third parties,

including health organisations, to bid for CIL funds. The approach to securing CIL funds is likely to vary by LPA.

CIL funding can be sought for both revenue and capital expenditure although the likelihood of securing it for revenue expenditure is low.

5. Parking Standards

Oxfordshire County Council has provided the following information on the required parking standards for new developments.

Health Centre parking standards, use class D1, the maximum requirements are:

- 1 space per Doctor or Dentist/1 space per 2 other staff/4 spaces per consulting or treatment room/1 ambulance space per Health Centre (min)
- Cycle parking 2 spaces per unit

Hospital parking standards, use class C2, the maximum requirements are:

- 1 space per Doctor or Consultant/1 space per 3 Nursing and Ancillary Staff/1 space per 3 beds/4 spaces per outpatient consulting room
- Operational Parking Space for ambulances and service lorries must be provided and will depend on the type and needs of the hospital
- 1 parking space per 10 staff

6. Progress to Date and Next Steps

The CCG is now actively engaging with the LPAs and the County Council. We are responding to planning applications, Local Plan consultations and are becoming more informally involved in a number of aspects of planning work.

Where appropriate and helpful we are tracking the growth in practice population, e.g. for the Didcot practices.

To ensure consultations are responded to in a timely manner and there is an audit trail of responses, a dedicated email inbox has been set up which all LPAs are being asked to use planning@oxfordshireccg.nhs.uk

It has been important to make LPAs aware of the current position with regard to the Transformation programme. We have advised that the Oxfordshire health economy is in the middle of a county-wide health service review, looking at the future provision of healthcare in Oxfordshire.

7. Action

The XXXX asked to

- i. note the background information relating to population growth and planning obligations; and
- ii. agree the approach to request sums for healthcare as a result of development (as set out in table 1 and table 2.

Important standards and references:

Core elements Health Building Note 00-03: Clinical and clinical support spaces
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/147845/HBN_00-03_Final.pdf

Health Building Note 00-09: Infection control in the built environment
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/170705/HBN_00-09_infection_control.pdf

Health Building Note 11-01: Facilities for primary and community care services
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/148509/HBN_11-01_Final.pdf

HBN 00-10 part A to D: includes guidance on flooring, walls and ceilings, sanitary assemblies and windows in healthcare facilities.
<https://www.gov.uk/government/publications/guidance-on-flooring-walls-and-ceilings-and-sanitary-assemblies-in-healthcare-facilities>

Heating and ventilation systems Health Technical Memorandum 03-01:
Specialised ventilation for healthcare premises
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/144029/HTM_03-01_Part_A.pdf

Heating and ventilation systems Health Technical Memorandum 03-01:
Specialised ventilation for healthcare premises
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/144030/HTM_03-01_Part_B.pdf

The Revised Healthcare Cleaning Manual (2009)
<http://www.nrls.npsa.nhs.uk/EasySiteWeb/getresource.axd?AssetID=61814>

The Workplace (Health, Safety and Welfare) Regulations 1992
<http://www.legislation.gov.uk/uksi/1992/3004/regulation/10/made>

APPENDIX 3.6. NATIONAL GRID



Beckley and Stowood Neighbourhood Plan
Royal Oak House
Stowood
Beckley
Oxford
OX3 9TY



Consultant Town Planner

Tel: 01926 439127
n.grid@amecfw.com

Sent by email to:
camps.walsh@btinternet.com

5 December 2017

Dear Sir / Madam

Beckley and Stowood Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

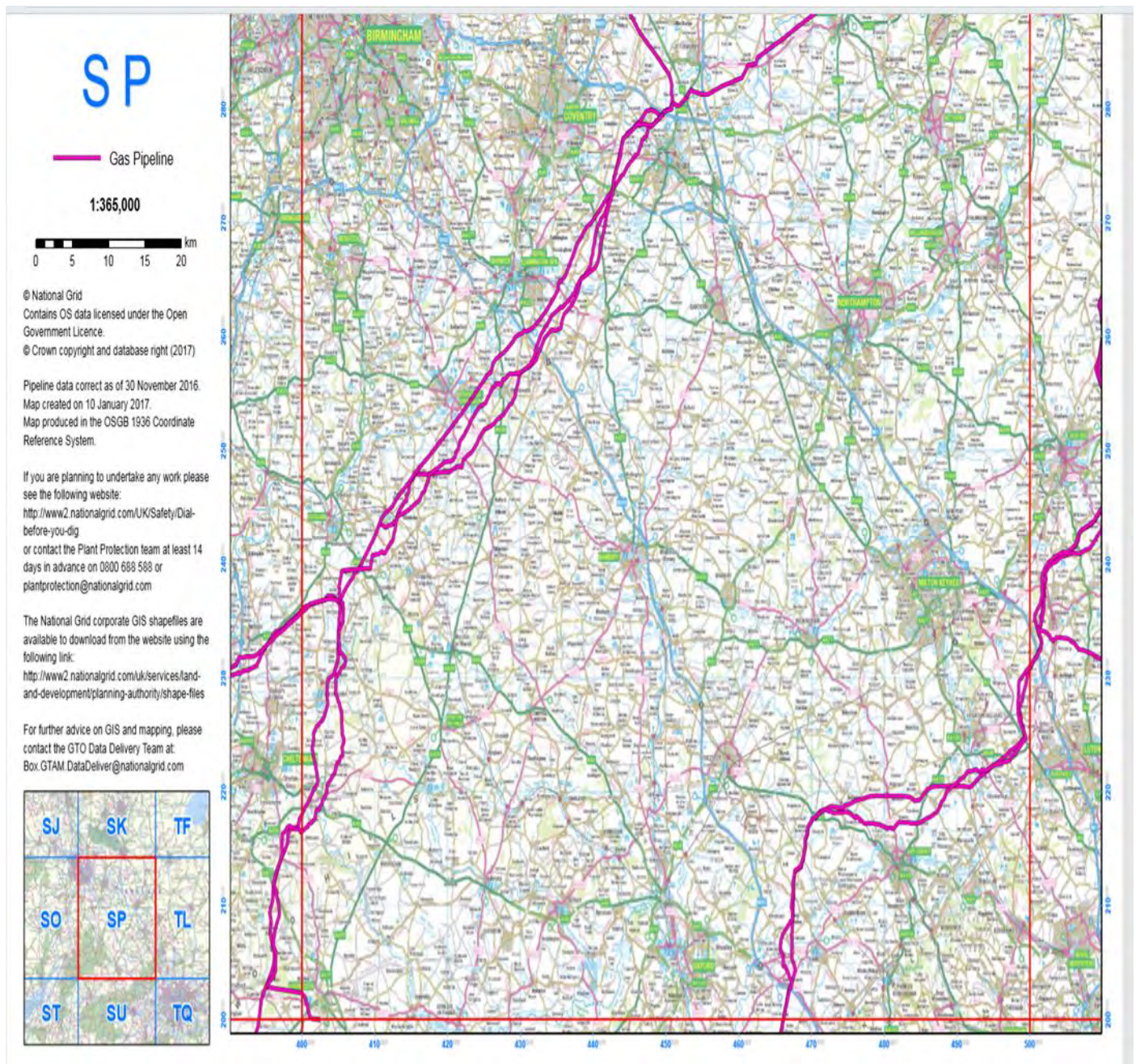
The electricity distribution operator in South Oxfordshire Borough Council is SSE Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
amecfw.com

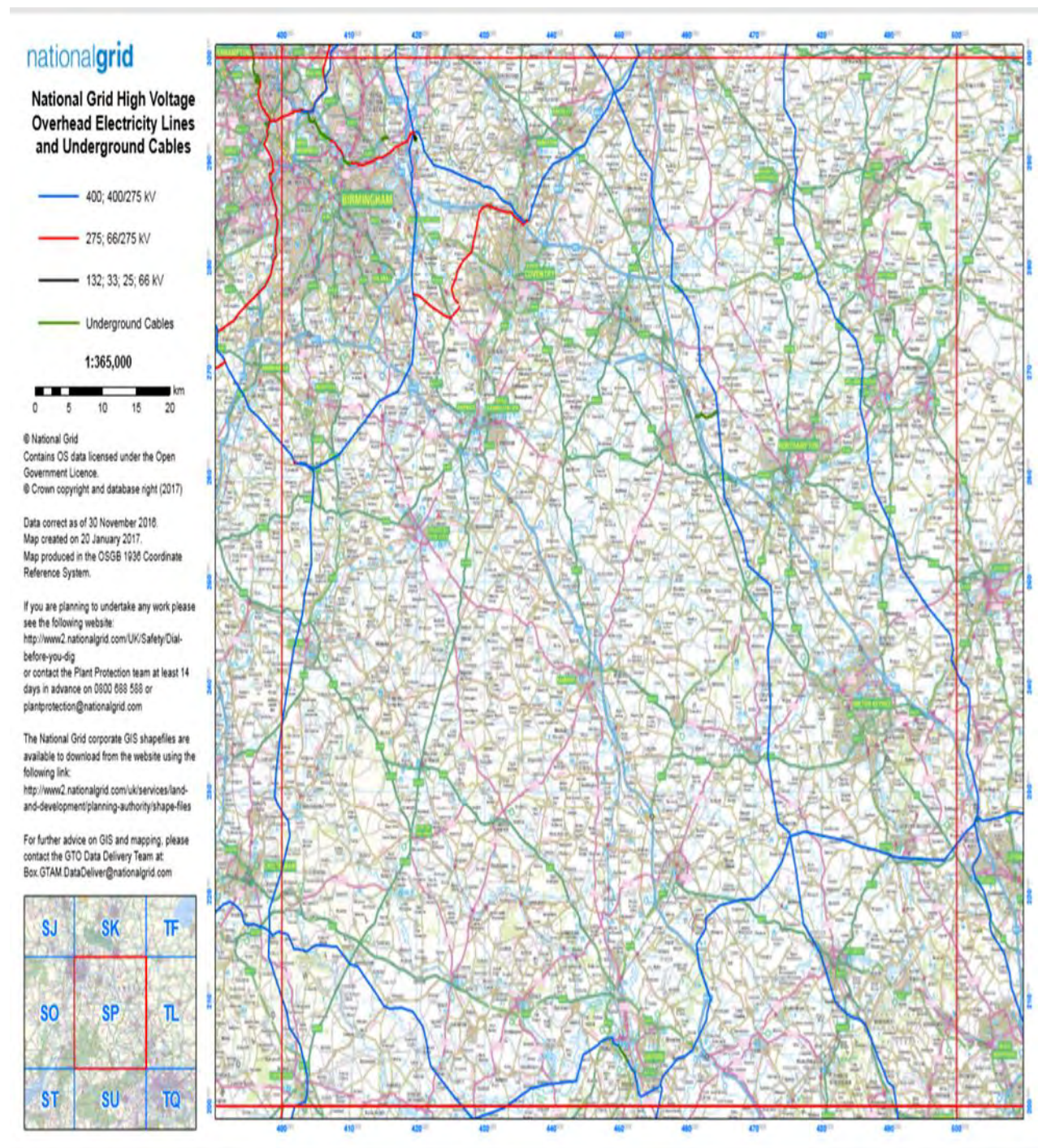
Amec Foster Wheeler Environment
& Infrastructure UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



<https://www.nationalgrid.com/sites/default/files/documents/8589938516-SP%20-%20National%20Grid%20high%20pressure%20gas%20pipe%20location.pdf>



National Grid Gas pipeline near Beckley



National Grid High Voltage Overhead Electricity Lines and Underground Cables

APPENDIX 3.7. SPORT ENGLAND

From: Planning South <Planning.South@sportengland.org>

Sent: 05 December 2017 09:34

To: camps.walsh@btinternet.com

Subject: Beckley and Stowood Neighbourhood Plan Pre-Submission Consultation runs until 24th February 2018

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 Parts 73 and 74. 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 Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.

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

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.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Part 74 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



Join the conversation #thisgirlcan



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

APPENDIX 3.8. BBOWT

Berkshire
Buckinghamshire
Oxfordshire



The Lodge
1 Armstrong Road
Littlemore
Oxford OX4 4XT

Ginette Camps-Walsh
Chairman Beckley and Stowood Neighbourhood Plan Steering Committee
Beckley and Stowood Parish Council
camps.walsh@btinternet.com

By email only

23rd February 2018

Dear Mrs Camps-Walsh,

Beckley and Stowood Neighbourhood Plan Pre-Submission Consultation – BBOWT comments on consultation

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the Beckley & Stowood Neighbourhood Pre-submission Plan. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of the local ecology on and around the parish area.

We welcome the production of the Neighbourhood Plan (NP) and can see that a lot of work has gone into the preparation of the document.

We welcome the recognition of Otmoor and Sydlings & Wick Copse in the document but note that the parish has further biodiversity interest that appears to have been missed. We therefore feel that the biodiversity interest within the parish boundary is currently not fully reflected.

Sydlings Copse is not only an Ancient Woodland and BBOWT reserve but is also designated as *Sydlings Copse & College Pond* Site of Special Scientific Interest (SSSI) for its nationally important nature conservation interest. Similarly Otmoor is not only an important RSPB reserve but parts of the site are also nationally designated as a SSSI.

The parish also includes several Local Wildlife Sites (LWS) within its boundary, i.e. *Beckley Pasture LWS*, *Constable's Piece LWS*, *Upper Park Farm LWS*, *Cookes Copse LWS*, and adjacent to the parish boundary, i.e. *Noke Wood & Sling Copse LWS* and *Otmoor LWS*.

Local Wildlife Sites (LWS) are local non-statutory designations that are important elements of the wider ecological network. In accordance with national and local planning policy development should not adversely affect the nature conservation status of such sites.

Some of the above mentioned sites are also designated as Ancient Woodlands (AW) but there is also an additional ancient woodland, *Blackwater Wood AW*, within the parish. The parish is also home to a number of priority habitats as well as protected and notable species.

In addition, the majority of the parish is covered by two Conservation Target Areas (CTAs), *Oxford Heights East CTA* and *Otmoor CTA*. CTAs have been mapped across Oxfordshire to identify where the greatest opportunities for habitat creation and restoration lie enabling efficient use of resources to deliver nature conservation benefits.

<https://www.wildoxfordshire.org.uk/biodiversity/conservation-target-areas/>

Policy CSB1 in the South Oxfordshire Core Strategy, states that:

A net loss of biodiversity will be avoided, and opportunities to achieve a net gain across the district will be actively sought.

Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be sought for all types of habitats, with a primary focus on delivery in the Conservation Target Areas.

The highest level of protection will be given to sites and species of international nature conservation importance (Special Areas of Conservation and European Protected Species).

Damage to nationally important sites of special scientific interest, local wildlife sites, local nature reserves, priority habitats, protected or priority species and locally important geological sites will be avoided unless the importance of the development outweighs the harm and the loss can be mitigated to achieve a net gain in biodiversity.

Policies ENV2 - ENV5 of SODC's emerging New Local Plan 2033 seek the protection and enhancement of the nature conservation interest within the district.

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=776170511&CODE=D2E6F03567847CD279E120E088D3DB19

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 states:

'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'

We could see limited recognition of biodiversity in the objectives and policies of the Neighbourhood Plan and as such feel that this duty has not been adequately met.

You might find the following two guidance documents useful when preparing this section of the NP:

Community & Parish Guide to Biodiversity

http://www.bbowt.org.uk/sites/default/files/files/Community_Doc_FINAL_MEDRES.pdf,

Biodiversity and Planning in Oxfordshire

https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/environmental_planning/countryside/naturalenvironment/Wholedocument.pdf

Ecological baseline data from the Thames Valley Environmental Records Centre (TVERC) should be used, and presented within the plan (or associated documents) to ensure that ecological assets are fully recognised and any potential future developments within the area take adequate account of biodiversity.

We recommend that a map, which identifies all international, national and locally designations, priority habitats and the Conservation Target Area (CTA) within and in proximity of the parish boundary is included within the Neighbourhood Plan or supporting evidence.

We also recommend that a policy is included that seeks the protection of existing habitats, species and features of nature conservation interests but also to require development to deliver a net gain in biodiversity as required by national policy and the South Oxon DC policy.

Policies on the natural environment / biodiversity have already been developed elsewhere and we include some example wording in the following paragraphs, which we hope you might find useful. You might want to consider a policy that is based on one of these but tailored to your parish.

Example policy wording from other Neighbourhood Plans

1. Bledlow-cum-Saunderton Neighbourhood Plan

Policy 10: Environment:

Development proposals must conserve and enhance designated environmental and landscape assets, especially the Chilterns Area of Outstanding Natural Beauty and the Lodge Hill and Butler's Hangings SSSIs.

In addition, any development proposals should contribute to and enhance the natural environment by ensuring the protection of local assets such as mature trees, hedgerows and woodland, and the provision of additional habitat for wildlife and green spaces for the community.

<https://www.wycombe.gov.uk/uploads/public/documents/Planning/Neighbourhood-planning/Bledlow-cum-Saunderton-neighbourhood-plan.pdf>

2. Long Crendon Neighbourhood Plan

Policy LC14: Green Infrastructure & Biodiversity

Development proposals must, where relevant by way of their location and/or type:

- i i. contribute to and enhance the natural environment;
- ii ii. ensure the protection of local assets;
- iii iii. seek to provide additional habitat resources for wildlife and green spaces for the community; and
- iv iv. protect endangered species.

Development proposals that enable the protection, enhancement or provision of new footpaths, bridleways and cycleways in and around the village will be supported, provided they accord with other policies of the development plan and have regard to the principles of the district-wide Green Infrastructure Strategy3.

Developments must deliver no net loss to biodiversity and wherever possible a net gain.

https://www.aylesburyvaldc.gov.uk/sites/default/files/page_downloads/Long%20Crendon%20Neighbourhood%20Development%20Plan%20-%20Submission%20Version.pdf

3. Watlington Neighbourhood Plan

(Sustainability Objectives (selection of those referring to the natural environment):

- *To conserve and enhance biodiversity and geodiversity, maximising opportunities for biodiversity within all new development, and paying particular attention to habitat linkage and wildlife corridors*
- *To protect and enhance the town's landscape setting and the countryside around it with special regard to the Chilterns AONB*
- *To protect the rural character of the Parish by minimising light encroachment in order to preserve dark skies*
- *To protect, enhance and manage the parish's watercourses, springs and ponds. To safeguard their margins and groundwater sources, restoring naturalised sections and creating wetland features where appropriate*

http://www.watlingtonnp.org.uk/Watlington-Neighbourhood Plan/Environmental_Sustainability_Group_15290.aspx)

4. Haddenham Neighbourhood Plan

Policy SRL3: Enhancing, Protecting and Providing new Natural Environment Habitats, Trees and Hedgerows

Proposals impacting on trees, other than those of poor quality, should be accompanied by a Tree and Hedgerow Survey and demonstrate an approach in accordance with national best practice, as set out in BS5837.

Landscaping proposals should include native species and habitats that respect the distinctive local landscape character and should seek to demonstrate a net gain in biodiversity in accordance with the Defra Biodiversity Impact Calculator.

- *Whenever possible, all new buildings must provide integrated Swift nesting features.*

- *Proposals requiring the provision of ecological information should demonstrate that they have taken BS42020 into account.*
- *Development adjacent to watercourses must retain a minimum natural habitat buffer of 12m.*

(<https://www.aylesburyvaledc.gov.uk/haddenham-neighbourhood-plan>)

We hope that you find these comments useful; should you wish to discuss any of the matters raised, please do not hesitate to get in touch.

Yours sincerely,

Senior Biodiversity & Planning Officer (Oxfordshire) I

Also emailed to: South Oxfordshire District Council
planning.policy@southoxon.gov.uk

APPENDIX 3.9. BLUE CEDAR HOMES



Ref: ST/JL

18 January 2018

Ginette Camps-Walsh
c/o Beckley and Stowood Parish Council
Woodperry Road
Beckley
Oxford
OX3 9UZ

clerk@beckley-and-stowood-pc.gov.uk

Dear Ms Camps-Walsh

Re: Blue Cedar Homes

I am writing to you from Blue Cedar Homes. We're a small company that builds discrete developments of homes that are purpose-designed for retirement living, allowing over-55s to retain their independence and live active lifestyles.

I am contacting you in your capacity as a representative of the Beckley and Stowood Neighbourhood Plan steering group. Our research shows that there is likely to be a relatively greater need for retirement living homes in your Neighbourhood Area in the coming years, compared to other areas in South Oxfordshire District.

We pride ourselves on taking a unique approach to the way that we select locations to build new homes and work with the local community to deliver them. We are vastly different to large housebuilders, offering a completely different product in high-quality, low density schemes that truly respond to the needs of older people and the wider community.

Rather than involving the local community immediately before or after a planning application is submitted, we believe that the best outcomes are achieved when the community leads the process, telling us what is needed and where it should be built. We can then create schemes of the highest design quality, that residents take ownership of and love.

We would love to work with your Neighbourhood Planning group to help deliver retirement living homes. I would therefore be grateful if you could let me know if you or your Neighbourhood Planning group feel that retirement living homes are something that your community is in need of and, if so, where you think that such homes could be built.

Please feel free to give me a call on 01454 201166 or send me an email at [REDACTED]

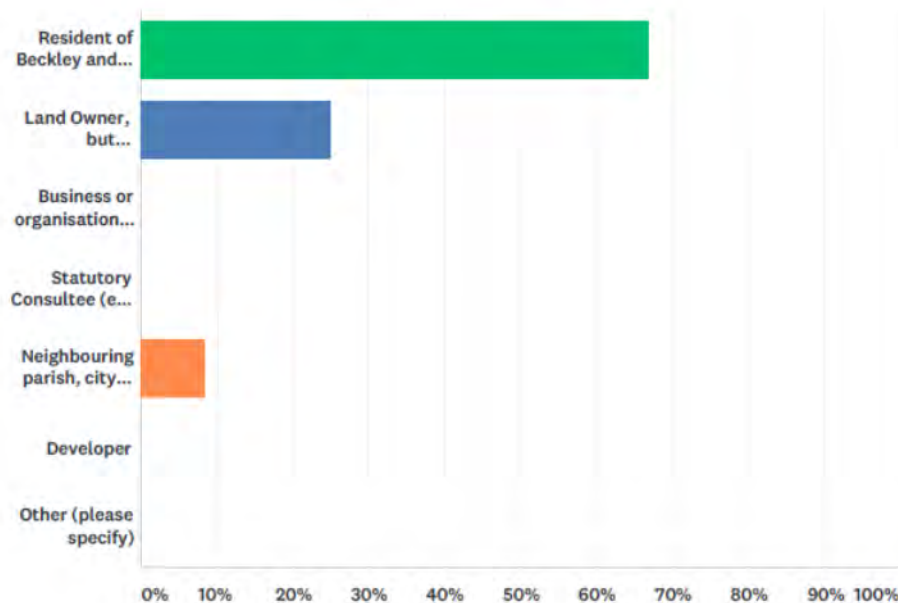
Yours sincerely

APPENDIX 4.1. INDIVIDUAL RESPONSES

12 responses from Survey Monkey of which 3 were from organisations – Noke Parish Council, Wick Farming Ltd and Buswell Parks. The other responses were from individuals. There was another response via e-mail and 5 responses by letter and e-mail from residents of New Road.

Q2 Please indicate in what capacity you are responding to this consultation -

Answered: 12 Skipped: 0



RESPONDENT 1.

Q2 Please indicate in what capacity you are responding to this consultation -

Land Owner, but non-resident of the Parish

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

5.2.1 Brown Field Sites

Section number and sub-title

5.2.1 Brown Field Sites

Q4 Please enter your comments below -

We support the redevelopment of the redundant Wick Farm Barns and Workshops which will have the benefit of restoring dilapidated heritage assets. We would like to see a pragmatic approach to the uses (i.e. Commercial and Care uses classes could be considered).

RESPONDENT 2.

Q2 Please indicate in what capacity you are responding to this consultation - **Land Owner, but non-resident of the Parish**

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title **5.2.1 Brown Field Sites**

Q4 Please enter your comments below -

We support the redevelopment of the redundant Wick Farm Barns and Workshops which will have the benefit of restoring dilapidated heritage assets. We would like to see a pragmatic approach to the uses (i.e. Commercial and Care uses classes could be considered).

RESPONDENT 3.

Q2 Please indicate in what capacity you are responding to this consultation - **Resident of Beckley and Stowood Parish**

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title **Section 3, Neighbourhood Plan Policies**
Section number and sub-title **5.1.1 Development Site Criteria**
Page number **89-90**

Q4 Please enter your comments below -

I agree with all points listed.

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title **Section 3, Neighbourhood Plan Policies**
Section number and sub-title **5.1.2 Environment**
Page number **91**

Q6 Please enter your comments below -

I agree with all these points. In relation to 5, it would be great to bury all power cables and telephone cables, but this would be very expensive and I'm not clear who would pay. In Church Street, some residents paid to have cables buried, but others did not: so, although the landscape is improved, it's not uniform

Q7 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Section number and sub-title **Beckley Design Guide**
Page number **92 - 93**

Q8 Please enter your comments below -

I strongly support each of these points, and particularly points 2, 4, 5, 6 and 12.

RESPONDENT 4.

Q2 Please indicate in what capacity you are responding to this consultation - **Land Owner, but non-resident of the Parish**

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley Neighbourhood Plan Policies
Section number and sub-title	3.5.1.1
Page number	89

Q4 Please enter your comments below -

There are some discreet but now derelict plots in the village that are too small for any productive purposes and where houses have been built around them over the years. (For example private track off Woodperry Road, and New Road near the mast) These should be considered as suitable sites for development providing they comply with the Neighborhood Development Plan Policies and Design Guidelines.

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley & Stowood Design Guide
Section number and sub-title	5.1.2
Page number	92-93

Q6 Please enter your comments below -

It would be forward thinking to see mention of encouragement for building to sustainable and ecological standards as far as possible.

RESPONDENT 5.

Q2 Please indicate in what capacity you are responding to this consultation -

Resident of Beckley and Stowood Parish

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

Plan Policies Section 3

Section number and sub-title

Para 5.1.2 design guide

Page number

5-7

Q4 Please enter your comments below -

In general I find these policies well considered and am supportive of them

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

Plan Policies Section 3

Section number and sub-title

5.1.3 definition of Village

Page number

Page 8

Q6 Please enter your comments below -

It seems correct to attempt to assist developers by guiding on the extent of the boundary. The boundary shown seems generally sensible but in my view needs a little fine tuning. It is difficult to see why some fields to the north of the high street and down church lane and to west along Common Road are included. Likewise why one or two houses are within the boundary of the Village but immediately adjacent houses are outside. That said, the approach seems very sound.

Q7 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

Plan Policies Section 3

Section number and sub-title

5.1.4 protection of peaceful environment

Page number

Page 10

Q8 Please enter your comments below -

For what it is worth, as the nearest neighbours of the rifle range, whilst we can hear noise it is not intrusive. It is a use which must be supported.

Q9 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

Plan Policies Section 3

Section number and sub-title

5.2.1 brown field sites

Page number

10-11

Q10 Please enter your comments below -

The comments made appear to make good sense.

RESPONDENT 6.

Q2 Please indicate in what capacity you are responding to this consultation - **Resident of Beckley and Stowood Parish**

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Section 2 A vision for Beckley
Section number and sub-title	1. Vision Statement and Core Objectives- Beckley Design Guide
Page number	87

Q4 Please enter your comments below -

11. Solar panels should be allowed where required to maximise their efficiency

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title	5.1.3 Definition of the Village
Page number	94

Q6 Please enter your comments below -

The entire village should be included in the Plan. There should be no village boundary shown in the Plan

RESPONDENT 7.

Your organisation (if a business or statutory consultee)	Noke Parish Meeting
--	----------------------------

Q2 Please indicate in what capacity you are responding to this consultation - **Neighbouring parish, city or district council**

I reviewed the Report on behalf of Noke Parish Meeting and can confirm we have no issues with the Document. We wish Beckley and Stowood the best of luck.

RESPONDENT 8.

Q2 Please indicate in what capacity you are responding to this consultation -

Resident of Beckley and Stowood
Parish

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

NP Section 1.2. Character, Opportunities, Threats

Section number and sub-title

3.3.5. SODC's Emerging Local Plan 2033 Second
Preferred Options

Page number

36

Q4 Please enter your comments below -

Please continue to oppose removing the Wick Farm area from the green belt and allowing development in that area. Apart from the destruction of the scenic area between Oxford and Beckley, there is the practical matter of the roads in this area being unable to cope with the additional traffic that such a development would generate.

RESPONDENT 9.

Q2 Please indicate in what capacity you are responding to this consultation -

Resident of Beckley and Stowood
Parish

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Respondent skipped this question

Q4 Please enter your comments below -

I worked on the plan and am thankful for the hard work and giving of time and energy that has brought it to where it is. I am eager for it to be put into official capacity so it could have an influence on new construction and redevelopment.

RESPONDENT 10.

Q2 Please indicate in what capacity you are responding to this consultation -

**Resident of Beckley and Stowood
Parish**

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

1.2 Character Constraints Opportunity Threats

Section number and sub-title

3.3.6 Oxford to Cambridge Expressway

Page number

38

Q4 Please enter your comments below -

This aspect of local planning is, by far, the greatest threat to our local environment. The option of a route between Beckley and Stanton is to be resisted at all costs. How a Road which would appear to cut through Shotover Country Park and Otmoor can be considered after the M40 route was diverted previously we fail to understand. Whilst the loss of farmland is to be regretted, the loss of 2 publicly accessible open spaces would disastrous.

One aspect which needs to be considered is the incidence of fog over Otmoor during winter months. Thus, an accident 'Black Spot' would be designed in!!!

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

Neighbourhood Plan Policies

Section number and sub-title

Section 2.10.1 and 2.10.2

Page number

3

Q6 Please enter your comments below -

It is important that some development is allowed to bring younger families into the village and also to provide for 'downsizing'. This could be encouraged as a local need.

RESPONDENT 11.

Q2 Please indicate in what capacity you are responding to this consultation - **Resident of Beckley and Stowood Parish**

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title **5.1.3 Definition of the Village**
Page number **94**

Q4 Please enter your comments below -

It makes sense to define the boundary of the village/settlement since that boundary is critical in deciding where infolding might be allowed. It may be better to drop the phrase "built-up" as that seems to confuse the planners.

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title **Overall**

Q6 Please enter your comments below -

The plan gives a valuable overview of the village and provides useful guidance to those who are thinking of undertaking development in the parish.

It defines design and planning matters in more detail than national and local policies, while remaining consistent with them.

RESPONDENT 12.

Q2 Please indicate in what capacity you are responding to this consultation -

Resident of Beckley and Stowood Parish

Q3 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Report Number and Title

Beckley & Stowood pre-submission consultation

Section number and sub-title

Section 2 4.2 and 4.3 and 3 5.1.1 and 5.1.2.

Page number

84 onwards

Q4 Please enter your comments below -

The Neighbourhood Plan has given us, the residents, the opportunity to think about how we want the parish to develop, how it has developed up until now and what we want for the future. The development has been essentially down to SODC Planning Officers and the village of Beckley has not developed well, especially in recent years. There have been a number of new developments that are overcrowded, the buildings have been overbearing to the houses either side and nearby, the sizes have not been in line with building regulations for the Green Belt and have been too large and they are not in keeping with the surroundings. e.g. a bungalow was replaced with a 3-storey large house with a flat roof. The only house in the parish with a flat roof. It is not in keeping with the village. There have been too many other similar planning approvals. I think the Development Site Criteria and Design Guide, although very good need beefing up to ensure that all new developments must be in keeping with their surrounding i.e. not higher, not larger than original building + 40% from 1943 - this has been consistently ignored by SODC Planning Officers. So a good job, but please beef up the planning regulations within the Neighbourhood Plan so SODC Planning Officers have to abide by them and do not grant planning permission for inappropriate over large houses as they have done in the past. SODC Planning Officers also allowed a single bungalow to be replaced by 2, 4 bedroomed 2 storey houses in Bungalow Close and then refused planning permission for another bungalow in the same road to add some bedrooms on another floor! Do they make it up as they go along? This sort of random non-compliance with no constituency or respect for the Green Belt regulations must not be allowed to continue.

Q5 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Section number and sub-title

Section 3 5.1.3.

Page number

94 onwards

Q6 Please enter your comments below -

In a recent planning application refusal, SODC Planning Officers cited as a reason that the building plot, which had previously had planning permission, which had lapsed, was outside the village boundary. When asked where the village boundary was, the Chief Planning Officer declined to say. It is apparently a secret that they can use at random, when they feel like it. This is not acceptable. The residents via the Neighbourhood Plan need to decide where the village boundary lies and it must not be kept a secret. New development has been confined to ever more dense development within one small area - along the Woodperry Road. This in itself detrimentally affects the openness of the Green Belt and is an unofficial policy that SODC Planning Offices have decided upon unilaterally. It means that any new development will mean knocking down existing houses along Woodperry Road and putting up more houses on already over crowded sites so it will look like town housing, rather than a village. There is a lot of land down the track that leads south directly from Woodperry Road where some of the land owners want to build houses. These could not been seen from anywhere else and it would be a sensible place to build new houses, so this should be allowed by defining the village boundary outside this area, so it can be developed.

Q7 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Section number and sub-title	Section 3 5.2.1
Page number	96

Q8 Please enter your comments below -

It is very sensible to encourage redevelopment of endangered listed barns and farm yards no longer used for agriculture. Other brown field sites should be added.

Q9 Please use this form for your comments on the Neighbourhood Plan. Please enter the Report Section number, section sub-title and number to which your comment relates below -

Section number and sub-title	Section 3 5.3.
Page number	97

Q10 Please enter your comments below -

I would very much welcome the removal of overhead cables and wiring from all over the parish. It is unsightly not just in the old part of the village, but everywhere. BT pays their sub-contractors by the pole, so they put up as many as possible. They are very ugly. Main gas would be brilliant - please pursue.

APPENDIX 4.1.1 – E-MAIL RESPONSE

Firstly, I consider the substantial body of work that you and your team have produced is impressive but too voluminous for me to read in its entirety.

I note the survey results but remain of the view that social engineering is undesirable, unsustainable and has no place in villages. Market forces should be allowed to dictate how small village conurbations evolve regardless of dwelling size or number of storeys.

I very much believe in the preservation of the green belt as a means of maintaining areas of undeveloped land between conurbations such that they are prevented from merging. I do not believe that the intention of the green belts was such that they have “fingers” within conurbations.....this is a lazy interpretation by Planning Departments to suit their own agenda. What is an acceptable buffer of green belt between conurbations? Clearly it will vary considerably. I understand the driving force that has led to seeking to define the limits of “Beckley Village” but I am uneasy about how tight the red line has been drawn. I believe it needs to be much looser to enable the village to grow organically without undue infilling.....there are some obvious infilling sites that in the past have been denied development under the banner of “within the green belt” which I believe to be ridiculous.....a couple of sites along New Road would be cases in point. I do support the concept of maintaining views and open spaces so as a generalisation I would not be supportive of development of existing gardens nor the demolition of one property to be replaced by multiple properties. Hence my belief that the interpretation of the “Beckley Village” should be much looser. The Abingdon Arms is a community facility and we have a very substantial village hall both of which would probably benefit if the population of Beckley Village was larger than it is today. Nonetheless the concept of the green belt would be lost if adjacent parishes were to allow development to the extreme edges of the adjacent borders of their parishes. There needs to be some controlled expansion of the village but not to the parish boundaries. Consultation with adjacent parishes might help.

Buses.....no strong view although I doubt that a bus service to many rural villages is a viable proposition.....another reason to be opposed to affordable/social housing.

I support the essence of the “Beckley Design Guide” but the clue must be in the word “guide”. This should not be without flexibility.....every scheme deserves to be considered on its merit.....Beckley should not become a living museum.

Traffic.....??????.....there is a certain conflict of interest if we want a thriving Abingdon Arms, a sustainable village school and a village hall with a utilisation that makes it at the very least revenue neutral. Housing stock is hardly a pertinent factor.

Schools.....In my judgement the school in Beckley needs to be relocated. The buildings and land should be sold to be replaced with houses. The school could conceivably be relocated to land adjacent to the recreation ground/village hall with the Parish granting licence for the recreation ground to be a shared facility with the school.

Mains Gas.....obviously this would offer an additional option for a source of energy but I think I would be correct in saying that over the 41 years that I have lived in Beckley oil has been by far the cheapest source of energy. I am content to stick with oil.

Cables.....underground is desirable but probably cost prohibitive.....not a priority for me.

Do we want street furniture?.....coordinated or otherwise.

As I said previously.....good work.

Further to my email of 03 January 2018 and the meeting in the Village Hall Tuesday 06 February 2018 I have concluded that there should not be a defined Village Boundary and certainly not the one on offer to date.

APPENDIX 4.2. NEW ROAD RESPONSES

APPENDIX 4.2.1

Sent: 24 February 2018 19:01

To: camps.walsh@btinternet.com

Subject: Village Plan

Dear Mrs Camps-Walsh

Please take the following comments forward for the consultation process on the village plan.

1. I believe it is unnecessary to establish a village boundary. It is not required by the planning process and is more likely to confuse rationale judgement on further development.
2. I believe that it is inappropriate to suggest that New Road is a suitable site for further development. This suggestion has been explored formally over the last two years and an initial decision by SODC and a review on appeal by a planning inspector have both given good reasons of which the Parish Council is very well aware that suggest this is a poor site. It does not fulfil the criteria for infill (The description of infill given suggest that this would be the case irrespective of any village boundary designation) and the road access is inadequate. That planning refusal further noted that even a modest bungalow development on the site would not be appropriate.
3. From the general village perspective expansion to the South of Beckley is illogical. The only threat to the separate identity and nature of Beckley is if it should coalesce with Barton and Oxford. Deliberately narrowing the gap between developments extending North from Barton and South from Beckley would seem to be folly. Should the end product of the Village Plan be to have a façade along New Road similar to that of Woodperry Road then the presentation of the village to those approaching from Oxford would have changed markedly; with the apparent development spreading significantly South into an area of otherwise rural appearance.

Thank you for consideration.

Yours sincerely

Beckley

APPENDIX 4.2.2.

SAT 17 FEB 2018
Saturday 17th February 2018

Dear Mr Scott,

I am writing to you in your role as chair of the Parish Council, to draw to your attention to the disappointment, anger and distress, experienced by the residents of New Road concerning the proposed establishment, of what appears to be an unnecessary, purely strategic and, from our point of view, vindictive village boundary. When [REDACTED] recently applied for planning permission for a piece of land along this lane, we approached the Parish Council and were told they did not express a view to the SODC. Subsequently, the application was rejected and the approach to appeal also unsuccessful.

Although on the surface, the available empty plots along this lane, once intended for small single storey dwellings with large garden allotments may seem ripe for development; times have changed. All the original properties have been extended (in accordance with greenbelt regulations) and the undeveloped plots, who's planning rights lapsed long ago, are now overgrown, wildlife sanctuaries with a history of planning application rejection.

New Road is already eroded by the considerable amount of traffic passing along to; the six existing dwellings, the farm buildings with light industrial storage use at the end, owned by Fox Hill Farm and the Mast (not only processing digital transmission for the BBC but also housing multiple mobile phone hubs). It is in our opinion, and in a recent High Ways Authority report, at capacity.

As all the driveways pose blind exits onto our lane, we have all experienced potential accidents when leaving our homes. We all regularly have to reverse in or back out from our drives when leaving or returning back home. The split dual road exit with the Sand Path is also hazardous and with further development down there it would be essential to create a wider more urban looking road way. Already the track which was once a sandy path down to the village has become an established lane, hazardous at both ends – Roman Way (on a bend) and our lane and New Inn Road at the other.

We were the last house to have substantial building work and this posed annoying complications. The farmer removed fences and allowed access through a side field onto our property. This was only possible because we are an end house. There are often issues of getting wide vehicles along here and any building work would be problematic for access.

Unlike the heart of the village, we are not on mains drainage or gas. We regularly experience electrical interruptions because of the high aspect and the electrical supply and piecemeal electrical installations make living along here complicated – something I am sure the electricity supplier would confirm. From the point of view of all amenities, there must be better served areas in Beckley suitable for development. The back of Church Street perhaps? But NO – this was bought by the residents to protect their rural aspect. This is what living in Beckley represents for most of us... living in the country, with fields and narrow lanes.

Just as Church Street bought their field, it was mooted by several that [REDACTED] sell his plot. He declined to do so, admittedly development would be more lucrative. He proved his attitude to nature by chain-sawing established trees and clearing the entrance before approaching an inspection. We have photographic evidence of this. Currently we have deer, badgers, rabbits, foxes, owls, woodpeckers and diverse other wildlife that come and go from these areas that The Village Plan earmarks for building.

Entering Beckley often means driving past New Road. We currently, according to the planners, do not *constitute infill*. Another reason for rejecting further development was maintaining the Greenbelt ethos and accepting (and in our case celebrating) the haven for wildlife and rural outlook these green areas (the undeveloped plots) provide. Not only for us, but for the whole village. Basically, by establishing the village boundary at New Road, without the courtesy of contacting the residents along here, or soliciting their views, the future of driving into Beckley and walking out of the village will become more urban. We are not a natural boundary. There has been development behind Woodperry Road, an area better accessed and nearer to mains drainage etc. I for one, would not wish to see New Inn Road further developed and in creating this new village boundary, you push Beckley further south towards the encroaching urban sprawl of estates around Bayswater and Barton and risk losing Beckley's rural charm.

It seems sad, that this Village Plan, no doubt constituting a huge amount of time and effort, is not asking for representation from the areas of the village it is singling out for change. As a group of residents we probably constitute some of the families that have lived in Beckley the longest, with a combined residency of over 250 years! It is not unreasonable that our voice is heard. And after at least three building applications have been rejected on New Road by SODC, it seems odd that a village plan should recommend building in that area. Why is this the case? And why, when it is not required, do we need to establish a village boundary?

Yours Sincerely,

APPENDIX 4.2.3.

20th February 2018

Beckley & Stowood Parish Council

and

Ginette Camps-Walsh

Dear Sirs,

Beckley Neighbourhood Plan

Re the above, I would make the following points for your consideration.

- From the plan I understand that there has never been a village boundary. If this is the case how can one be arbitrarily generated.
- Also, from the plan the whole village is and will remain in the green belt and be subject to green belt planning policy. This has been demonstrably inconsistent as can be seen by the ribbon development of large houses along the Woodperry Road replacing very small properties on large plots vs strictly controlled development elsewhere including New Road and Sand Path where the Green Belt policy of maximum 40% increase in volume has been strictly enforced. If as the plan suggests these areas can now be developed how can we be sure that the same inconsistencies will not be applied, namely more black square boxes and large houses as at the bottom of the Sand path already.
- It appears to be suggested that by generating a 'village boundary' along New Road limited infilling will only be allowed here but logically it will also allow infilling on Sand Path and across the fields at the end of the lane which comes from the Woodperry Road at Appletree House.`
- I believe it is very dangerous to suggest ANY incursion into the green belt. It will in my view be the thin end of the wedge and all manner of speculative developments will follow with the planners following their own agenda as to what will be allowed.
- In particular there could be additional infilling at the White House end of New Inn Road and elsewhere along the Horton Road. There are already three new mansions at the White House and developments in progress at Sandy Warren, New Road and Cornerways, Horton Road. This is also Green belt but it appears to make no difference to the planners. This whole area to the South of Beckley village will be at risk with numerous brown field opportunities and vacant plots available for development.
- The last planning application in 2016 for infilling in New Road was rejected. The reasons for rejection are on public record and have not changed. Why should generating a village 'boundary' change the reasons for this rejection as the area is still within the green belt.

I ask that you please consider these point when the neighbourhood plan is discussed.

Yours faithfully,

APPENDIX 4.2.4.

Sent: 12 February 2018 11:05

To: Ginette Camps-Walsh <camps.walsh@btinternet.com>

Cc: clerk@beckley-and-stowood-pc.gov; planning@southoxon.gov.uk

Subject: Village plan Village Boundary

I wish to object to the creation of a village boundary map. I am led to believe that this is not necessary as part of a Development Plan and is not a requirement. The following points are of concern to me:

1. I filled in a feedback questionnaire but I don't believe that included a village boundary question.
 2. I would like to know what the consultation was and who decided where the boundary line went. I feel that the Parish Council need to be transparent about this.
 3. I obviously have an interest in this and the implications for planning issues for New Road and the rest of the village.
 4. I am concerned about the village creeping southward and joining up eventually with the Bayswater Road area.
 5. Finally on looking at a map it seems obvious to me that the land south of Woodperry Road does not constitute part of the built up area of the village. Indeed South Oxfordshire Planners described new Road as recently as late 2015 as "an isolated ribbon of development," lying "outside the village of Beckley." (planning application appeal refusal P15/S2462/FUL)
- The same planning response states, "The appeal site is located amongst a small cluster of residential properties located in the Green Belt south of the village of Beckley. It forms a part of a small ribbon of development outside the main settlement boundary and neither forms part of the village itself nor can it be said to be part of an otherwise built up frontage"

For the above reasons I would like this to be considered a formal response to the consultation and be treated as such.

I look forward to a response/feedback.

Yours faithfully

APPENDIX 4.2.5.

G.Camps-Walsh/Village Development Plan Group
cc Beckley Parish Council,
South Oxfordshire District Council.

To all concerned,

We were unable to attend the meeting (6th Feb) in the village hall but would like the following strong opinions to be considered.

- a) We note with thanks the amount of hard work which has gone into the plan so far.
- b) We would like to object strongly to the creation of any village boundary and cannot recall this creation being part of the initial survey.
- c) Should the majority of the village feel the need for a village boundary we would suggest that the obvious southern part of that boundary should go straight along the bottom of the gardens of Woodperry Road. It is very obvious from the map that Sand Path and the housing south of Woodperry Road is sparse and not part of “the built area of the main village” and we feel that allowing the village to sprawl towards the south is not a good idea.

Please consider this our feedback to the consultation document.

Yours Faithfully,

APPENDIX 5. MINUTES FROM THE PUBLIC MEETING

Minutes of Public Meeting 6th February 2018: Consultation on Draft Neighbourhood Plan

The meeting was well attended and commenced with a slide show presented by Ginette Camps-Walsh to go through the salient points of the neighbourhood plan and the process involved in producing a neighbourhood plan.

The floor was then opened up to questions from members of the audience.

Issues:

New Road

A number of occupants of New Road raised concerns that New Road was being brought within the village boundary. There is no requirement by SODC to define the village boundary and it would appear to be an attempt to encourage planning on New Road. In previous planning applications the openness of the surroundings has been mentioned as an objection to planning. Additionally, the Planning Inspector commented that development of New Road would lead to harm to the greenbelt.

We are unable to designate any development sites within the village plan and thus any future applications for New Road would still be subject to the normal rules on greenbelt, infilling etc

The response we received to our initial consultation on planning was that Beckley should take its fair share of development. The committee had a walkabout around the village and it was clear that there are areas within the village where properties could be built, meeting the design criteria without detrimentally affecting others.

Views

A query was raised as to whether there was a right to a view. Rachel from SODC clarified that views that can be seen from the public realm can be protected – thus the view from Woodperry Road could be protected.

Detail in Design Guide

A Parish councillor from Stanton St John said that he had concerns over our design guide. In Stanton St John they have deliberately gone into the minutiae for instance specifying what materials should be used for any curbing. It was pointed out that the curbing in SSJ had been carried out at the control of the village. Also, the only curbing in Beckley is on High Street and therefore limited.

Burying Cabling

Whilst some cabling in Church Street has been buried underground this had to be carried out at the cost of the residents. Further up Church Street householders were unable/unwilling to pay which is why the work has not been carried out.

The cabling in Stanton St John has been buried underground. This was a huge project and was carried out with the assistance of grants. The grant applications must be made before any of the work is carried out. The grants are only applicable to Conservation Areas.

Verges

The grass verges within the village have been eroded over the years and it seems impossible to preserve them. Can the Neighbourhood Plan assist with this and have the Parish Council considered reinstating them. The verges are owned by the council and their permission would be required.

Woodperry Road

The issue of historic development on the Woodperry Road was raised. The anomalies in terms of planning decisions on the Woodperry Road is one of the reasons for trying to put a Neighbourhood Plan in place. Nothing can be done about the decisions that have been made in the past but the Neighbourhood Plan should stop future unsuitable developments.

Infilling

It was asked whether the Neighbourhood Plan could change infilling policies. The answer to this is no as this is something covered by the Local Plan and Neighbourhood Plan cannot alter public policy

Legal Status of the Neighbourhood Plan.

Once in place the Neighbourhood Plan becomes part of the overall development plan for the area and has to be taken into consideration when looking at planning applications. The plan at present carries no weight but it will acquire more weight as it goes through the process until the point that a public vote is carried out and at that point if it receives 51% of votes or more then it has full legal status.

Neighbourhood plans are normally designed to last approximately 20 years although they can be reviewed during that period. In practice most neighbourhoods review their plans every 5 years. Thame is currently on its second neighbourhood plan. If there are specific issues in the intervening periods then these can be looked at.

Farming and business.

It was pointed out that our plan does not deal much in terms of farms within the Parish. Farms are potentially one of the biggest challenges for rural challenges due to diversification into light industry. It was raised as to whether this should be addressed further within the plan.

In terms of businesses, we did contact businesses but got no feedback. A decision was made to concentrate on housing as there is very little commerce in the Parish.

Timescale

There is no definitive timescale for getting the neighbourhood plan in place. There are various stages which need to be gone through each of which takes some time. There are also varying factors, for instance some Parishes have gone through 2 pre-submission consultations which has impacted the time frame. The formal examination process itself can take at least 2 months. Certain notice periods are also required for the referendum. From this point we are still looking at a number of months.

The meeting concluded with a discussion about the new Cambridge Expressway. One of the proposed routes appears to skirt Beckley. Ginette asked for volunteers for a committee to look at objecting to the proposal.

APPENDICES REGULATION 14 AND SEA SECOND CONSULTATION	130
APPENDIX 6. LIST OF CONSULTEES	131
APPENDIX 7. LOCAL PLANNING AUTHORITIES	137
APPENDIX 7.1 – RESPONSE OXFORDSHIRE COUNTY COUNCIL	137
APPENDIX 7.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL	143
APPENDIX 8. NATIONAL CONSULTEES	174
APPENDIX 8.1. NATURAL ENGLAND	174
APPENDIX 8.2. HISTORIC ENGLAND	176
APPENDIX 8.3. NATIONAL GRID	177
APPENDIX 8.4. CPRE	180
APPENDIX 9. LAND OWNERS PEGASUS FOR CHRIST CHURCH	181
APPENDIX 10. INDIVIDUAL RESPONSES	220
APPENDIX 10.1 BECKLEY RESIDENT	220
APPENDIX 10.2 WICK FARM RESIDENT	221
APPENDIX 10.3 LOCAL MINISTRY CHURCH OF ENGLAND	222
APPENDIX 10.4. JPPC - RE SANDY ACRE	223

APPENDIX 6. CONSULTEES

BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN PRE- SUBMISSION CONSULTATION 1.8.22 - 14.9.22							
STATUTORY CONSULTEES							
Statutory consultation bodies	Organisation	Email Salutation	Email address (personal e-mails removed)	Sent	E-mail Chased	Response date	Response Appendix Number
(a) where the local planning authority is a London borough council, the Mayor of London;	n/a						
(b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Oxfordshire County Council			1.8.22	6.9.22		
	Oxfordshire County Council		southandvale@oxfordshire.gov.uk	1.8.22	6.9.22	15.9.22	2.1. Comments on mitigation policies
	South Oxfordshire & Vale of White Horse District Councils		planning.policy@southandvale.gov.uk	1.8.22	6.9.22	14.9.22	2.2. Comments on a number of policies
	Cherwell District Council		planning@cherwell-dc.gov.uk	1.8.22	6.9.22		
	Launton & Otmoor Councillors		Cllr Gemma Coton	1.8.22	6.9.22		
			Cllr Simon Holland	1.8.22	6.9.22		
			Cllr Angus Patrick	1.8.22	6.9.22		
	Forest Hill & Holton Councillor		Cllr Tim Bearder	1.8.22	6.9.22		
	Wheatley County Councillor		Cllr Tim Bearder	1.8.22	6.9.22		
Local Parish Councils							
Islip			clerkislippc@hotmail.co.uk	1.8.22	6.9.22		
Woodeaton				1.8.22	6.9.22		
Noke			nokeparishmeeting@gmail.com	1.8.22	6.9.22		
Elsfield				1.8.22	6.9.22		
SSJ			stantonstjohnpc@gmail.com	1.8.22	6.9.22		
Forest Hill			theclerk@foresthillwithshotover-pc.org	1.8.22	6.9.22		
Horton cum Studley			clerk@horton-cum-studley.org.uk	1.8.22	6.9.22		
Risinghurst and Sandhills			clerk@risinghurstandsandhills-pc.gov	1.8.22	6.9.22		
Oxford City Council			planning@oxford.gov.uk	1.8.22	6.9.22		

(c) the Coal Authority(1);	The Coal Authority	Sir/Madam	planningconsultation@coal.gov.uk	1.8.22		4.8.22	Not a statutory consultee - informed SODC
(d) the Homes and Communities Agency(2);	Homes and Communities Agency	Sir/Madam	enquiries@homesengland.gov.uk	1.8.22	6.9.22		
(e) Natural England(3);	Natural England	Sir/Madam	consultations@naturalengland.org.uk	1.8.22	6.9.22	14.9.22	3.1. No specific comments
(f) the Environment Agency(4);	Environment Agency		planning_THM@environment-agency.gov.uk	1.8.22	6.9.22		
(g) the Historic Buildings and Monuments Commission for England	Historic England	Sir/Madam	e-seast@historicengland.org.uk	1.8.22	6.9.22	7.9.22	3.2. We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time
(h) Network Rail Infrastructure Limited (company number 2904587);	Network Rail	Sir/Madam	townplanningwestern@networkrail.co.uk	1.8.22	6.9.22		
(i) a strategic highways company - any part of whose area is in or adjoins the neighbourhood area; (ia) where the Secretary of State is the highway authority for any road in the area of a local planning authority any part of whose area is in or adjoins the neighbourhood area, the Secretary of State for Transport;	Highways England	Sir/Madam	info@highwaysengland.co.uk	1.8.22	6.9.22		
(j) the Marine Management Organisation(6);	Marine Management Organisation	Sir / Madam	consultations.mmo@marinemanagement.org.uk	1.8.22	6.9.22		

(k) any person - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	EE		public.affairs@ee.co.uk	1.8.22	6.9.22	
	Three			1.8.22	6.9.22	
	EMF Enquiries - Vodafone & O2	Sir / Madam	EMF.Enquiries@ctil.co.uk	1.8.22	6.9.22	
	BT		public.affairs1@bt.com	1.8.22	6.9.22	
	BT Group CEO				6.9.22	
			hello@gigaclear.com	1.8.22	6.9.22	
	Gigaclear		info@gigaclear.com	1.8.22	6.9.22	
(l) where it exercises functions in any part of the neighbourhood area — (i) a clinical commissioning group established under section 14D of the National Health Service Act 2006; (ia) the National Health Service Commissioning Board; (ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(8); (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(9); (iv) a sewerage undertaker; and (v) a water undertaker;	Oxfordshire Clinical Commissioning Group NHS England			1.8.22	6.9.22	
			reception.jubileehouse@property.nhs.uk	1.8.22	6.9.22	
	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board			1.8.22	6.9.22	
	Thames Water - Developer Services		developer.services@thameswater.co.uk	1.8.22	6.9.22	
	Thames Water - Planning Policy		thameswaterplanningpolicy@thameswater.co.uk	1.8.22	6.9.22	
	National Grid		box.landandacquisitions@nationalgrid.com	1.8.22	6.9.22	
	Avison Young (on behalf of National Grid)		nationalgrid.uk@avisonyoung.com	1.8.22	6.9.22	14.9.22 3.3. National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.
	SSE Energy Supply			1.8.22	6.9.22	9.8.22 No comment
	UK Power Networks		ConsentsEnquiries@ukpowernetworks.co.uk	1.8.22	6.9.22	
	British Gas		customerservice@britishgas.co.uk	1.8.22	6.9.22	

(m)voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;	Age UK Oxfordshire		admin@ageukoxfordshire.org.uk	1.8.22	6.9.22		
	SOHA		housing@soha.co.uk	1.8.22	6.9.22		
(n) bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;	Update on individual basis						
(o) bodies which represent the interests of different religious groups in the neighbourhood area;	Diocese of Oxford			1.8.22	6.9.22		
(p) bodies which represent the interests of persons carrying on business in the neighbourhood area; and	Update on individual basis		none found				
(q) bodies which represent the interests of disabled persons in the neighbourhood area.			none found				

Additional consultees advised to contact (if appropriate to area)							
	CPRE Oxfordshire		administrator@cpreoxon.org.uk	1.8.22	6.9.22	31.8.22	3.4. E-mail supporting environment, important views and dark skies and suggesting a possible policy for reduction of visible light transmittance
Oxfordshire Disability Groups	https://www.oxfordshire.gov.uk/cms/sites/default/files/ folders/documents/socialand healthcare/peopledisabilitie s/general/disabilitydirectory. pdf				6.9.22		
					6.9.22		
	Crossroads - Oxfordshire		care@oxfordshirecrossroads.org.uk	1.8.22	6.9.22		
	Oxfordshire Community & Voluntary Action		admin@ocva.org.uk	1.8.22	6.9.22		
	Oxfordshire Mental Health Matters - MIND		info@oxfordshiremind.org.uk	1.8.22	6.9.22		
Local Businesses and Groups							
	The Abingdon Arms		info@theabingdonarms.co.uk	2.8.22	6.9.22		
	AMPM technical services			2.8.22	6.9.22		
	Chairs of Oxford		info@chairsfoxford.co.uk	2.8.22	6.9.22		
	Concise Media Branding		sales@cmbgroup.co.uk	2.8.22	6.9.22		
	Damprot Renovations Ltd		info@damprotrenovations.co.uk	2.8.22	6.9.22		
	Eadles Van Hire		sales@eadles.co.uk	2.8.22	6.9.22		
	Eadles Redways Farm			2.8.22	6.9.22		
	Fairview Cattery			2.8.22	6.9.22		
	Heli-Lift			2.8.22	6.9.22		
	Oxford Crematorium			2.8.22	6.9.22		
	Oxford Event Hire,		sales@oxfordeventhire.co.uk	2.8.22	6.9.22		
	Oxrend Ltd		info@oxrendltd.co.uk	2.8.22	6.9.22		
	The Oxfordshire Stove Company		sales@oxfordstoveco.co.uk	2.8.22	6.9.22		
	Paul Southouse Arcitects		studio@paulsouthouse.co.uk	2.8.22	6.9.22		
	Stowood Scientific Instruments Ltd		sales@stowood.com	2.8.22	6.9.22		

	Beckley Church of England School		office@beckleyschool.org	2.8.22	6.9.22		
	Forest Farm Montessori School		admin@oxfordmontessori.co.uk	2.8.22	6.9.22		
	BACBS		info@bacbs.org	2.8.22	6.9.22		
	BBOWT			2.8.22	6.9.22		
	Cyclox		contact@cyclox.org	2.8.22	6.9.22		
	Otmoor Riding Group			2.8.22	6.9.22		
	RSPB			2.8.22	6.9.22		
Local Land Owners							
	Christ Church and Developers LnBB		info@bayswateroxford.co.uk	2.8.22	6.9.22	13.9.22	3.5. Complained the Neighbourhood Plan should be confined to the parish outside the Land north of Bayswater Brook site and should not have any mitigation or other policies that affect the site or current residents.
Most covered by residents e-mails							
	Graham Honor						
	Beckley Park			2.8.22	6.9.22		
	Wadley Hill Farm						
	Folly Farm			2.8.22	6.9.22		
	JMA Pickford						
Total Contacts							
Individual Responses	Beckley resident					20.8.22	4.1. Suggestion that the church and churchyard are important viewpoints.
	Wick Farm resident					8.9.22	4.2.. Complained about LnBB deevlopment, overlooking Wick Farm and other issues. Forwarded to SODC Planning Officer responsible for LnBB devlopment and the County Council.
	Local Ministry Team		he Church of England parish of Beckley			6.9.22	4.3. The Church as a community as well as the building should be included.
	JPPC on behalf of Sandy Acre					14.9.22	4.4. Want Sandy Acre lying to the north of Woodperry Road to be included in the settlement boundary.

APPENDIX 7. LOCAL PLANNING AUTHORITIES

APPENDIX 7.1 – RESPONSE OXFORDSHIRE COUNTY COUNCIL



OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

District: South Oxfordshire

Consultation: Beckley & Stowood Pre-Submission Neighbourhood Plan

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

The County Council is supportive of parish and town councils in their ambitions to prepare neighbourhood plans. We hope you find our comments in the attached Annex helpful as you make significant amendments prior to submitting the plan. With reference to our comments made in the Annex, there does need to be substantial change made to the Neighbourhood Plan to meet the basic conditions, specifically relating to the mitigation policies relating to the Land north of Bayswater Brook strategic allocation. We would also advise that our Oxfordshire County Council neighbourhood planning guide can be found [here](#). We look forward to seeing the Submission version of the plan.

Officer's Title: Planner

Date: 14 September 2022

ANNEX 1

OFFICER ADVICE

District: South Oxfordshire

Consultation: Beckley & Stowood Neighbourhood Plan Pre- Submission Document

Team: Strategic Planning

Officer's Title: Principal Planner

Date: 30 August 2022

Strategic Comments

It is not clear to us whether this draft neighbourhood plan is written in a positive way, or whether it seeks to limit development in a manner which is not consistent with the purpose of neighbourhood plans and would not meet the basic conditions. For example, Policy DS 1 'Important Views' might excessively restrict development. These are matters that we expect will be reviewed at this pre-submission stage with District Council officers, so that appropriate revisions can be made before a submission version of this neighbourhood plan is produced.

We understand that a neighbourhood plan becomes part of the development plan when made, and even before that some policies may be material considerations e.g. after the submission neighbourhood plan has been examined. The timing of the neighbourhood plan process in relation to the Land North of Bayswater Brook planning application process is not known at this stage. Although the neighbourhood plan only covers part of the Local Plan allocation STRAT13 for Land North of Bayswater Brook, there is potential for the neighbourhood plan to affect the consideration of the outline, full and reserved matters applications. The neighbourhood plan policies intended to apply to the part of the Land North of Bayswater Brook within the neighbourhood plan area should be clearly identified, as they will likely need to be carefully examined in relation to whether they are in general conformity with strategic policy STRAT13 and related strategic policies contained in the Local Plan.

Parts of the pre-submission neighbourhood plan appear to be out of date and will need to be reviewed before submission. It is noted that the Land North of Bayswater Brook main site promoters have undertaken community engagement during 2022. Public information from those site promoters is available on their website: www.bayswateroxford.co.uk. Nevertheless, the development of the strategic site is expected to progress over several years and include reserved matters applications, and it is reasonable to expect ongoing discussions and liaison with parish councils.

Some neighbourhood plans and local plans have been produced with car parking policies, but please note that the County Council is due to consider the matter of car parking standards in September 2022 and we expect that the County Council will have new standards after that to inform our professional advice as the Local Highway Authority on planning applications.

South Oxfordshire District Council is required to distribute certain percentages of CIL funds to parish councils where development is located. The latest South Oxfordshire CIL spending strategy is available online. There is an opportunity for the neighbourhood plan to identify how it will use such funds to improve infrastructure in the parish, and we would be interested in commenting if such is included in this neighbourhood plan going forward.

District: South Oxfordshire

Consultation: Beckley & Stowood Neighbourhood Plan Pre- Submission Document

Team: Transport Development Control

Officer's Title: Principal Development Control Manager

Date: 2nd September 2022

Transport Development Control Comments

Page 49 states:

'These improvements should be discussed and agreed with the "Community Liaison Committee"'

This sets an unreasonable expectation and should be removed.

Page 51 states:

'The developers now wish to increase the number of dwellings by 55% to 1,450. This is likely to mean the same number of additional cars on local roads. Together the former Green Belt strategic sites around the ring road–Grenoble Road, Northfields, Barton Park and Land north of Bayswater Brook will generate in excess of 7,050 more cars'.

We do not recognise the number of cars above and it should not be referred to in this Neighbourhood Plan. Planning application documents for each of the sites will in due course be prepared and identify the various uses proposed and their expected traffic generation.

Policy DS 2 Parking

Car parking standards are due to be considered by the County Council Cabinet in September 2022. Following consideration, if adopted, any planning applications will be assessed against those new parking standards by Highways Authority officers. We therefore think this draft policy needs to be amended.

Policy CC 1 New construction and energy efficiency

Reference could be made in the supporting text to the Oxfordshire Electric Vehicle Infrastructure Strategy September 2021.

Mitigation Policy TA 1 Transport Assessment and Travel Plan

We agree with the text of the draft policy that it is for the Transport Assessment and Travel Plan of the site to fully address the transport impacts from the site, which will be assessed by Oxfordshire County Council as the Local Highways Authority.

Mitigation Policy TA 2 Transport Assessment and Travel Plan – Baseline Assumptions

This draft policy is not suitable for inclusion in a Neighbourhood Plan and should be removed. As part of any Transport Assessment, the scope and assessment parameters should be agreed with the County Council Highways Authority Officers.

Mitigation Policy TA3 Transport Assessment and Travel Plan – Highway and Road Assessments

This draft policy should be removed. The Highways Authority offers a service to scope out and agree the area for junction capacity modelling.

Mitigation Policy CM 1 Provision of Construction Management Plans

The location of the Oxford Crematorium is acknowledged and Oxfordshire County Council notes the importance of minimising the disturbance to this facility during construction. Construction and Environmental Management Plans (CEMP) and Construction Traffic Management Plans (CTMP) are often required, to be enforced via condition of any planning permission, therefore this policy is not needed.

Mitigation Policy TA 4 Compliance with NICE Guidelines on physical activity and the environment and health assessment.

Consideration should be given to referencing the adopted County Council Local Transport and Connectivity Plan (LTCP), which contains policies in relation to active travel and sustainability that should be applied to all planning applications. National guidance such as the LTN 1/20 and Oxfordshire County Council's Walking and Cycling Guidance should be referenced, as well as the requirement for Walking, Cycling and Horse riding Assessment and Reviews (WCHARs) where necessary in accordance with GG142 of the DMRB.

Mitigation Policy PC 1 Maintenance of access and separation of footpaths and bridleways

This draft policy could refer to the LTCP and the Policy 1 wording of the movement hierarchy, which puts pedestrians first. Where applicable, Oxfordshire County Council requires applicants to undertake a Walking, Cycling and Horse riding Assessment and Review (WCHAR) and a thorough audit of the impact on pedestrian routes.

Mitigation Policy PC 2 Siting of pedestrian and cycle bridge over A40 northern bypass road and safety and crime reduction

This draft policy is neither suitable nor appropriate for inclusion in a neighbourhood plan. The delivery of the bridge over the A40 will be considered as part of the planning application for the STRAT 13 site. Any mitigation will be considered as part of the Transport Assessment (TA) and General Arrangement (GA) plans submitted with an application. The County Council will require any such bridge to be constructed in accordance with Design Manual for Roads and Bridges (DMRB) and Local Transport Note (LTN) 1/20.

Mitigation Policy PC3 Widening of Public Rights of Way for Safety

Should alterations be required to any Public Right of Way, the necessary formal procedures will have to be followed. This draft policy is not appropriate for a neighbourhood plan. One overarching policy for pedestrian provision could include mention of the appropriate elements of this draft policy, rather than a separate policy on Public Rights of Way.

District: South Oxfordshire

Consultation: Beckley & Stowood Neighbourhood Plan Pre- Submission Document

Team: Oxfordshire County Archaeological Service

Officer's Title: Planning Archaeologist

Date: 30/08/2022

Archaeology Comments

The neighbourhood plan appropriately highlights the heritage of Beckley and Stowood, however proposed Policy H1: Preservation of Heritage is currently drawn too narrow, confining consideration of the historic environment to only those elements described in the Beckley Conservation Area Appraisal and Character Assessments. Further, it makes no distinction between designated and non-designated heritage assets.

In order to address these issues and encapsulate all aspects of the historic environment within the parish, we would recommend that Policy H1: Preservation of Heritage is amended along the lines of the following that would serve to achieve the goal of conserving and enhancing the historic environment as set out in, and to accord with, the NPPF.

Policy - Historic Environment

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

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2021).

We would further recommend the removal of Mitigation Policy - H1. Archaeological Site Survey as the provisions for such will be appropriately accommodated through existing adopted policy contained in the Local Plan.

APPENDIX 7.2 SOUTH OXFORDSHIRE DISTRICT COUNCIL

Policy and Programmes

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



Listening Learning Leading

dial

14 September 2022

Beckley & Stowood Neighbourhood Development Plan – Comments under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

Thank you for giving the Council the opportunity to offer formal comments on your draft neighbourhood plan. We would like to take this opportunity to complement you on the preparation of a very thoughtful and well produced plan.

Having seen a complete draft, along with the SEA and evidence base, we are able to offer further advice under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

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

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

Yours sincerely

Senior Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1	General comment	There are numerous references to the South Oxfordshire Core Strategy within the plan. Although the Core Strategy was part of the development plan during some of the plan preparation, it was superseded by the South Oxfordshire Local Plan when that was adopted in December 2020. References to the Core Strategy should be updated/removed throughout the plan.
2	General comment	Quotes should be referenced throughout the plan, this should include the document name and date it was published. For example, section 1.2 includes government definitions, but does not show the source. We recommend including the full reference for all quotes included in the plan.
3	General comment on map legibility	Please check the map quality. Some maps, such as Figure GB 1, are quite blurry which makes it difficult to read the key or interpret the information.
4	General comment on document accessibility	The draft neighbourhood plan has been run through Adobe Acrobat Pro's Accessibility Check and Accessibility Report features. The plan has passed almost all of the tests. Adding alternate text to images and figures, a title to the properties of the document, and bookmarks to the document structure would make the document more accessible. We have officers within the council who can provide more information and support on making your documents accessible; please contact us if you would like any help.
5	Section 1.1: Basic Conditions	<p>The wording of the basic conditions is not accurately reflected. Please amend:</p> <p>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:</p> <ul style="list-style-type: none"> a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

Ref.	Section/Policy	Comment/Recommendation
		<p>e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)</p> <p>f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p>
6	Section 1.4 July '22 – Neighbourhood Plan submitted to SODC	The last bullet point should be updated to reference the regulation 14 consultation.
7	<p>Objective 7: Reducing the Harm to the Environment and Residents from Development at Land North of Bayswater Brook</p> <p>General comment on references to Bayswater Brook strategic site</p>	<p>The framing of Objective 7 and the consequent referencing of the Bayswater Brook strategic site has a negative tone. We understand there is local concern regarding the strategic site, however comments regarding the impacts the site should be factual and evidence based rather than conjecture. Paragraph 18 of the NPPF makes it clear that neighbourhood plans should only contain non-strategic policies and paragraph 29 states that Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. They must be in general conformity with the strategic policies contained in any development plan that covers their area.</p> <p>It is important to note that Policy STRAT13 deals with this allocation and sets the requirements for the site / masterplan and highlights where there are to be no demonstrable detrimental negative impacts, which align with the concerns raised in the Beckley & Stowood Neighbourhood Plan.</p> <p>The NPPF states in paragraph 16 that plans should be prepared positively. There are some references to the neighbourhood plan fighting the development at the Bayswater Brook strategic site. We recommend these are removed and wording amended throughout to show that the policies are not seeking to undermine the delivery of the strategic site, but add additional local detail where appropriate.</p>

Ref.	Section/Policy	Comment/Recommendation
8	General comments on Policies VB 1. And VB 2.	<p>We consider that these two policies could be amalgamated into one policy.</p> <p>The intention of both policies is to direct development within or outside the settlement boundary. By combining the policies, it would make the intention of the policies clearer and more precise and will make it easier for the reader to understand what is and is not acceptable. The policy wording should also acknowledge the strategic allocation.</p> <p>We suggest merging the two policies with the following wording;</p> <p>'The Neighbourhood Plan defines the settlement boundary as set out in Figure VB1 on the Policies Map.</p> <p>Proposals for limited infill and redevelopment of previously developed land within the defined settlement boundary will be supported provided they accord with the policies within the adopted local plan and the neighbourhood plan.</p> <p>Development outside the settlement boundary and outside the Bayswater Brooks strategic allocation will only be supported where they are appropriate for a Green Belt location as set out in National Policy and have regard to the principles of sustainable development.</p> <p>Proposals for inappropriate development will not be supported except in very special circumstances.'</p>
9	<p>Policy VB 1. Settlement Boundary</p> <p>The Neighbourhood Plan defines the settlement boundary as set out in Figure VB1. on the Policies Map.</p> <p>The settlement boundary includes parts of the Conservation Area as well as and the area of land containing dwellings on the west side of Roman Road and the south side of</p>	<p>The policy clearly directs the reader to the map showing the settlement boundary; however, the second sentence of the policy reads better as supporting text rather than policy wording. The sentence is explanatory and does not add any additional policy direction to the reader. We recommend moving the second sentence from the policy into the supporting text.</p> <p>In order to ensure consistency with the green belt criteria set within the NPPF, we suggest adding the word 'limited' in front of infill. Policy H16 of the South Oxfordshire Local Plan refers to both infill and redevelopment. In order to be</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>Woodperry Road.</p> <p>Proposals for infill development within the settlement boundary will be supported, provided they accord with the design and development management policies of the development plan and other policies of the Neighbourhood Plan.</p>	<p>consistent, this policy VB 1. should also refer to redevelopment of previously developed land as appropriate inside the boundary.</p> <p>We consider more explanation in the supporting text is required to clarify the rationale behind the settlement boundary. For example, what has and has not been included and how have these decisions been made. These should focus on the principles that were utilised to make the decision about what is included within the boundary line.</p> <p>We also recommend shortening the last sentence. Any development will need to accord with strategic and non-strategic policies within the development plan and so we suggest removing reference to the design and development management policies of the development plan.</p>
10	<p>Policy VB 2. Residential Development outside the Settlement Boundary</p> <p>Outside the settlement boundary depicted on the Policies Map proposals for residential development will only be supported if they are for one of the exceptions to national Green Belt policy. Other residential development will generally be inappropriate. Development proposals outside the settlement boundary which meet one of the Green Belt exceptions should be designed to ensure that they are in keeping with the prevailing character of the area in terms of their impact on built form, density and landscape quality, and that the location, sustainability and accessibility of the site is acceptable having regard to the principles of sustainable development.</p> <p>The southernmost area of the parish</p>	<p>We consider that this policy would be more concise and clear if it were merged with policy VB 1 (see above).</p> <p>The first part of the policy seeks to deal with the principle of development. This is already clearly defined in national policy. As written, the neighbourhood planning policy replicates part of national policy and misses out important details. There is no mention of inappropriate development being potentially supported where very special circumstances are demonstrated. National policy sets out that neighbourhood plans should serve a clear purpose and should not repeat existing policies (paragraph 16 of NPPF).</p> <p>The wording of the last sentence of the first paragraph 'Other residential development will generally be inappropriate' is unprecise and in conflict with clear direction given in the NPPF.</p> <p>National policy sets out that the construction of new buildings is inappropriate in the Green Belt. Exceptions to this are listed in paragraph 145 and 146 of the NPPF.</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>including Wick Farm and Lower Farm have been removed from the Green Belt with the adoption of the SODC Local Plan as they are within the strategic development site of Land north of Bayswater Brook and are therefore not included in this policy.</p>	<p>The second part of the policy seeks to guide the design of any development allowed in part one of the policy. This section largely repeats the requirements set out in Policy DG1 – Design guide. It should be noted that Policy DG1 is also more detailed.</p> <p>The final paragraph of the policy reads better as supporting text rather than policy wording. The sentence is explanatory and does not add any additional policy direction to the reader. We recommend moving the second sentence from the policy into the supporting text</p> <p>If not combining with policy VB 1, we recommend rewording the policy as follows;</p> <p>'Development outside the settlement boundary and outside the Bayswater Brooks strategic allocation will only be supported where they are appropriate for a Green Belt location as set out in National Policy and have regard to the principles of sustainable development.</p> <p>Proposals for inappropriate development will not be supported except in very special circumstances.'</p>
11	<p>Policy E 1. Biodiversity</p> <p>Development proposals which show a biodiversity net gain and conserve and enhance the environmental and landscape assets in the Plan area, including areas of designated Ancient Woodland, Sites of Special Scientific Interest, RSPB reserves, Conservation Target Areas, Biodiversity Action Plan Priority Habitats and Local Wildlife Sites (including BBOWT reserves) will be strongly supported.</p>	<p>This is a supportive policy which seeks to conserve and enhance the environmental and landscape assets in the NDP designated area.</p> <p>The second paragraph could be made more concise by removing reference to 'their plans and supporting technical information'. Also consider adding the words 'where appropriate' in front of 'secure the' to add clarity and to ensure the requirement is proportionate to the development.</p> <p>The last part of the policy which refers to green spaces for the community should be removed. Green spaces for the local community should be dealt with separately and green spaces for biodiversity are best left undisturbed.</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>Development proposals should demonstrate, through their plans and supporting technical information, how they will deliver a biodiversity net gain and conserve local assets such as mature trees, hedgerows, grass verges along the roads and woodland edges, and secure the provision of additional habitat areas for wildlife and green spaces for the community.</p> <p>In addition, development within the areas of the NRN Regeneration Zone, and shown in Oxfordshire Treescape Project Maps listed below will only be approved if they show that they do not prevent the aspirations for future additions to wildlife corridors or air quality improvements.</p>	<p>We therefore recommend rewording the second paragraph to state the following;</p> <p><i>'Development proposals should demonstrate how they will conserve local assets such as mature trees, hedgerows, grass verges along the roads and woodland edges, and where appropriate secure the provision of additional habitat areas for wildlife.'</i></p> <p>The final part of the policy is not positively prepared and seem to be placing blanket restrictions on large areas of land. In addition, the Treescapes report should not be viewed in isolation as there are other considerations which should be taken into account. To address this issue we recommend the policy should require development to have regard to the findings of the report. It is also not clear what areas are affected by this policy (ie is it both the NRN regeneration zone and the Treescapes Project Maps?). The relevant map(s) should be included within the plan itself to allow for ease of read across.</p>
12	<p>Policy H 1: Preservation of Heritage</p> <p>Applicants should demonstrate how they have had regard to the character and appearance of the historic environment (including heritage assets both above and below ground), as described in the Beckley Conservation Area Appraisal and the individual Character Assessments at Appendices 12 to 15 of this Neighbourhood Plan, in the formulation of their development proposals. Proposals that demonstrably sustain or enhance the significance of the historic environment and the features that</p>	<p>We note that the policy supports sustaining and enhancing heritage assets within Beckley and Stowood. The National Planning Policy Framework states that this is one of the three aspects local planning authorities should take account of when determining planning applications. Paragraph 192 sets out the other two aspects. It would also be useful to look at paragraph 197 as it refers to non-designate heritage assets and also paragraph ENV6 of the South Oxfordshire Local Plan which provides policy on the historic environment within South Oxfordshire.</p> <p>We suggest that the policy is reviewed to take into account the other aspects set out in paragraph 192, paragraph 197 of the NPPF and policy ENV6 of the South Oxfordshire Local Plan.</p>

Ref.	Section/Policy	Comment/Recommendation
	contribute to that significance will be supported.	
13	<p>Policy DS 1. Important Views</p> <p>The Neighbourhood Plan identifies the following Important Views on the Map see Figure 2.11.1.2. and photographs in Evidence Base 2 -2.11</p> <ul style="list-style-type: none"> • Views from the top of the hill at Beckley village looking north, north east and north west towards Otmoor • Views of the countryside from within Oxford city, notably the green fields around Wick Farm • Views from the approach roads towards the village northwards over Otmoor and adjacent farmland • Views from the village towards Shotover • Views towards Brill and towards Aylesbury from Woodperry Road • Views from the north towards the church and Conservation Area • Views from Stowood to Didcot and the Stokenchurch cutting • Views from Wick Farm and Lower Farm across the Green Belt and agricultural landscape <p>Development proposals should preserve or enhance the local character of the landscape and through their design, height and massing should recognise and respond positively to the various Important Views. Development proposals which would have a significant adverse impact on an identified Important View will not be supported.</p>	<p>A clear and well written policy, however there are some amendments which we consider will further improve the clarity of the policy.</p> <p>The maps in 2.11.1 need to be at a better scale so they are easier for the reader to use. It is also important to make sure all the photos of the views are taken from public vantage points.</p> <p>It would helpful and make the policy clearer if the viewpoints listed in the policy are numbered to correspond with the viewpoints on the maps, and listed in the same order. For example, there are eight views identified/listed in the policy but 10 views on map 2.11.1.2 (although there isn't a number 9). The map is also slightly blurry.</p> <p>I note the supporting text and images in evidence base 2 of the plan, however in order to support each of the views within the policy, it is important to set out the justification for including each viewpoint. Detailed analysis which describes and assesses what is important or valuable about these views, and why they merit protection will help the reader and examiner understand why these are important to the local community. The quality of some of the photos in the evidence base document could be improved to sharpen the focus and enable the importance/value of the identified view to be better perceived.</p> <p>Viewpoints 6 and 10 cover the area of the strategic allocation at Bayswater Brook which is currently an agricultural landscape, but will be subject to change. Consideration should be given as to how this will interact with the strategic allocation and the indicative concept plan within the adopted Local Plan. The PPG is clear that a 'neighbourhood plan should support the delivery of strategic policies set out in the Local Plan' and should not undermine the delivery of the strategic site.</p>

Ref.	Section/Policy	Comment/Recommendation
14	<p>Policy DS 2. Parking</p> <p>New development and extensions/changes to existing development (e.g., change to House in Multiple Occupation) should make adequate provision for parking within the overall site, to avoid parking on the narrow village roads, in accordance with the provisions of the Development Plan.</p> <p>Parking provision should:</p> <ul style="list-style-type: none"> • Wherever practicable, parking be provided off-road. • Be sufficient for the full life of the development and should avoid the increase in on street parking or use of existing car parks in the future. • Minimise the impact of the private car on the street scene and reflect the character and appearance of the immediate locality as set out in the Character Assessments at Appendices 12 and 13. • Avoid leading to the loss of front gardens where alternative solutions can be shown to exist. 	<p>The Local Plan 2035 supersedes the old Local Plan 2011 and the Core Strategy 2012. Therefore, references to SODC Core Strategy should be removed where possible.</p> <p>Please amend the policy to detail the 'Oxfordshire County Council Standards' which is the appropriate standards that should be applied instead of the 'Development Plan'.</p> <p>Some slight amendments are needed to the bullet points in order to link up with the leading sentence. We recommend that the first bullet point should be reworded as follows; <i>'wherever practicable be provided off-road.'</i></p> <p>The second bullet is overly onerous. It will not be possible to predict what parking provision will be required for the future or the full life of the development. We therefore suggest that the second bullet point is therefore removed as it goes beyond the scope of planning.</p>
15	<p>Policy DS 3. Flood Risk and Development</p> <p>1. Development proposals should demonstrate, through the provision of flood risk assessments, where required, how the risk of flooding resulting from the prospective development will be managed, so that the risk of flooding within the Neighbourhood Plan Area for Beckley and Stowood will not be increased, and that opportunities to reduce flood risk, for example, through the</p>	<p>The mention of sustainable drainage systems is welcomed. However, with the exception of part 3, the policy within the neighbourhood plan seeks to replicate the requirements within the Local Plan.</p> <p>Paragraph 16 of the NPPF states that plans should <i>'serve a clear purpose, avoiding unnecessary duplication of policies.'</i> The neighbourhood plan policy seeks to do what is already set out in INF4 and EP4.</p> <p>Policies INF4 and EP4 of Local Plan 2035 seeks to ensure that there is sufficient water and drainage infrastructure to support any development and to reduce the risk of flooding.</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>use of sustainable drainage systems, are exploited, where possible.</p> <p>2. Where new development will result in the generation of additional foul sewerage, developers should ensure that they demonstrate how an appropriate foul drainage strategy can be delivered, and then ensure that it is delivered.</p> <p>3. Proposals which minimise the use of paved and hard standing areas and utilise porous driveways and planting instead to reduce the risk of flooding and run off will be supported.</p>	<p>Policy INF4 requires that development proposals must demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the whole development and that it would not lead to problems to existing users.</p> <p>Policy EP4 places a requirement for development proposals within Flood Zones 2 and 3 to be accompanied by a site-specific Flood Risk assessment. The policy also requires the same for development proposals in Flood Zone 1 if it meets the criteria set.</p> <p>The reference to SuDS could be further strengthened by being more specific about the quality and functionality of the SuDS - multi-function SuDs have the potential to deliver many other benefits to the surrounding communities. This would be in line with Policy EP4 in the South Oxfordshire Local Plan which says that SuDs 'should seek to enhance water quality and biodiversity in line with the Water Framework Directive'. Harpenden Neighbourhood Plan contains a strong policy on managing surface water flood risk (see page 61 of the Locality 'How to write a plan in a climate emergency' guide).</p> <p>Otherwise, the policy is duplicating existing policy and is not adding any additional detail (with the exception of the last point). It is therefore recommended that this policy is either deleted, and the last point is incorporated into the design policy; or it is substantially modified to take into account the above recommendations and the duplicate elements are removed.</p>
16	<p>Policy DS 4. Dwelling Size</p> <p>Extensions to dwellings or the erection and extension of ancillary buildings within the curtilage of a dwelling, will be permitted provided that:</p> <p>i) within the Green Belt the extension or the alteration of a building does not result in disproportionate additions over and above the size of the original* building;</p>	<p>This draft policy is almost an exact replica to Policy H20 in Local Plan 2035. The only addition is removal of reference to OCC parking standards and instead replaced with reference to NP policy on parking and the addition to the reference to NP design guide.</p> <p>Paragraph 16 of the NPPF states that plans should 'serve a clear purpose, avoiding unnecessary duplication of policies.' The neighbourhood plan policy seeks to do what is already set out in policy H20. We suggest that the policy is</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>ii) adequate and satisfactory parking is provided. Development should have regard to the Beckley and Stowood Neighbourhood Plan Policy DS2. Parking; and</p> <p>iii) sufficient amenity areas are provided for the extended dwelling. Development should have regard to the advice within the South Oxfordshire Design Guide and the Beckley and Stowood Neighbourhood Plan Design Guide DG 1.</p> <p>*'Original' means the volume as existing on July 1st 1948, or if constructed after that date, as originally built. Garages and outbuildings will not be included in this calculation</p>	<p>removed as it is a repetition of the requirements in policy H20 of the Local Plan 2035</p> <p>I note that the supporting text mentions that there is some desire for small houses/bungalows. If you can show a local need there could be an opportunity to positively amend this policy to show policy support for smaller houses/bungalows.</p>
17	Policy DG 1. Beckley Design Guide	<p>This policy is quite lengthy and could be shortened to be made more concise. Some of the wording currently within the policy reads better as supporting text such as 'Gardens are a very important feature in Beckley ...' and 'Grass verges on the road frontage of dwellings are an important feature...' Further refinement of the policy is required.</p> <p>The policy does not recognise that part of the parish is contiguous with Oxford city and that requiring building heights to be no higher than 3 storeys everywhere is overly restrictive and unduly onerous. The wider Bayswater Brook allocation adjoins the Barton Development where in some places building heights extend to 4 and 5 stories.</p>
18	<p>Policy DG 2. Night Sky/Lighting</p> <p>Where external lighting is necessary development proposals must incorporate design features and mitigating measures that avoid excessive lighting in order to limit the adverse impact of lighting on neighbouring</p>	<p>Not all external lighting requires planning permission. We therefore recommend adding 'where planning permission is required...'</p>

Ref.	Section/Policy	Comment/Recommendation
	residents, the rural character of the countryside and biodiversity	
19	<p>Policy CC 1. New Construction And Energy Efficiency</p> <p>New dwellings should be built to the highest standards in terms of energy and materials efficiency. The provision of the following sustainability features, where appropriate, will be supported:</p> <ul style="list-style-type: none"> • Alignment of dwellings - south facing where possible to give passive solar heating and to maximise solar roof panels. • Maintenance - ensure minimum maintenance in all design features. • High level of energy generation on site utilising solar panels, ground source and air source heat pumps as appropriate. • High level of insulation. • Sustainable water systems including drainage (driveways) and storage. • Developers shall be encouraged to provide electric vehicle charging points for all new dwelling 	<p>We are pleased to see a policy on this topic, especially as it aligns with South Oxfordshire District Council's corporate objectives.</p> <p>The policy provides detail which could complement policy DES10 of Local Plan 2035. To do this more effectively you could link the policy where it references highest standards (which is not currently defined) to state it should meet the standards in policy DES10, or subsequent standards as they emerge in Local or National Policy.</p>
20	<p>5.7. Community Aspiration - Compliance with Beckley and Stowood Neighbourhood Plan Policies</p> <p>Monitoring by the Oxfordshire Neighbourhood Plan Alliance has shown that the policies of made Neighbourhood Plans in SODC which have legal weight, have in some instances been ignored by SODC Planning Officers. This has resulted in planning permission</p>	<p>The law requires planning applications to be determined in accordance with relevant policies in the development plan (which includes made neighbourhood plans) unless material considerations indicate otherwise.</p> <p>The council strongly disputes the suggestion that it has failed to give appropriate weight to neighbourhood plan policies and recommends this section is deleted.</p>

Ref.	Section/Policy	Comment/Recommendation
	being granted which is not in compliance with local made Neighbourhood Plans.	
21	<p>Community Aspiration - Monitoring Compliance of the Neighbourhood Plan</p> <p>The Beckley and Stowood Neighbourhood Plan steering group wish to be consultees on all planning applications within the parish, along with the Parish Council, to monitor adherence and compliance of the Neighbourhood Plan</p>	<p>The Parish Council (PC) is the qualifying body responsible for the preparation, monitoring and any future review of the neighbourhood plan. The steering group act as a subcommittee of the parish council. If the steering group wishes to continue to be involved, this needs to be agreed with the PC. The PC, when consulted on planning applications, can work with the steering group if it chooses to keep it in place.</p>
22	General Comment on mitigation policies	<p>We acknowledge the consideration that has gone into developing the draft mitigation policies, however, we have some concern that these policies go beyond the remit of what a neighbourhood plan can do in seeking to deal with strategic issues and will be difficult to implement in practice and may therefore be removed at the examination.</p> <p>Neighbourhood Plan policies are only applicable to development within the designated neighbourhood plan area, and parts of the strategic site allocation at Bayswater Brook falls outside of this area.</p> <p>Neighbourhood planning allows for local communities to get involved and help shape non-strategic development in their area and it is important to consider what it is appropriate for a neighbourhood plan to deal with. The National Planning Policy Framework (NPPF) is clear that neighbourhood plans should not undermine the delivery of the allocated development. Para 13 of the NPPF states 'Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies'. Furthermore, neighbourhood plans should only deal with non-strategic issues (para 18). The NPPF also states that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies (para 29).</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Most of the issues with the STRAT13 allocation identified within the neighbourhood plan as requiring mitigation are already included within the South Oxfordshire Local Plan. Therefore there is a lot of duplication of matters and the NPPF is clear that plans should 'serve a clear purpose, avoiding unnecessary duplication of policies' (para 16). Neighbourhood plans should not repeat local plan policy, especially where the neighbourhood plan policy includes less detail.</p> <p>Some policies also add additional requirements for the local plan allocation to meet. There is no evidence that these additional requirements have been assessed as to whether they impact the viability of the allocation.</p> <p>Overall, additional evidence, viability and justification is needed throughout the mitigation policies. It is important to note that the Bayswater Brook allocation has been through examination and found sound. It is currently going through the planning application process which will deal with many of the points that are raised in the mitigation policies</p> <p>Below are some comments on the draft policies. We recommend engaging with Oxfordshire County Council on the transport matters as the Local Highway Authority. In addition, where previous amendments have been made to policies, some of the policy titles are no longer relevant and should also be updated to reflect the updated policy.</p>
23	Figure 2.1	Figure 2.1 has the parish boundary and the boundary of the STRAT13 allocation shown on it, but they are not listed on the legend. We recommend adding something to make it clear what the green and red outlines are showing.
24	<p>6.1. Community Engagement Strategy and Community Engagement</p> <p>In bringing forward proposals for the development of the Land North of Bayswater</p>	<p>It is a laudable objective to want to improve communication and for the community to have more of a say in the development as it progresses; however some aspects of the strategy go above and beyond what is legally required ie newsletters to each household</p> <p>The main subject of the strategy is the establishment of a community liaison committee. This is not a land use issue and therefore it would be outside the</p>

Ref.	Section/Policy	Comment/Recommendation
	Brook strategic allocation site the developers should have regard to the Community Engagement Strategy outlined in this Neighbourhood Plan.	<p>scope of a neighbourhood plan to require its use. Since this approach would require voluntary buy in from the developers, the strategy should be informed and supported by evidence of the developers support.</p> <p>The colour of the box suggests that this is a policy, but unlike the other policies it does not have a number assigned. The policy refers to the community engagement strategy, the main subject of which is the establishment of a community liaison committee. As stated above; the requirement for a liaison group is not a land use issue.</p>
25	The Bayswater Brook is the current boundary of the Green Belt at LnBB and as such is a permanent boundary fulfilling the requirements of NPPF 130 c. No such 'permanent boundary' has been proposed as a new boundary. It must be ensured that the new boundary as defined in the amended Local Plan is as permanent as possible.	<p>It is incorrect to state that the Bayswater Brook is the current boundary of the Green Belt. The site is no longer within the Green Belt. Furthermore, there is a distinction between the Green Belt boundary as a line drawn on a map, and the physical 'boundary' for containment on the ground.</p> <p>It is worth noting that the Green Belt boundary could be subject to review in future, and NPPF allows for that. The reference to NPPF para 130 c does not refer to Green Belt and should be amended to the relevant reference.</p> <p>Within the Local Plan, STRAT6 states: <i>"The Green Belt boundary has been altered to accommodate strategic allocations at STRAT8, STRAT9, STRAT10i, STRAT11, STRAT12, STRAT13 and STRAT14, where the development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities. The boundaries of the reviewed Green Belt are identified on the changes to the Green Belt boundary maps (see Appendix 4)."</i> (my emphasis)</p> <p>Furthermore STRAT13 also includes the requirement that the scheme <i>"provides a permanent defensible Green Belt boundary around the allocation and a strong countryside edge"</i></p>
26	Mitigation Policy GB 1. Definition of a new Green Belt Boundary	The policy introduces a prescriptive requirement for Oak saplings to be planted every 10 metres along the Green Belt boundary. It is not clear what evidence

Ref.	Section/Policy	Comment/Recommendation
	<p>A line of English Oak Quercus robur saplings, pot grown, at least 1.8m high will be planted every 10m along the new Green Belt boundary and will be actively maintained for at least 5 years</p>	<p>there is that this is an appropriate or the most suitable method to achieve the required aim, or whether it has been tested for viability purposes.</p> <p>If you wish to retain the policy we would recommend removing the requirement and instead allow for flexibility. The last paragraph should also be reworded to provide policy direction to the reader. This will help to ensure the policy is implementable. We recommend the following wording;</p> <p>'To help develop a permanent boundary to the green belt in line with STRAT13, it is encouraged that a line of English Oak Quercus Robur is planted. When planted they should be at least 1.8 metres high and pot grown to ensure a boundary can be established quickly.'</p> <p>The supporting text also advises that the boundary is agreed with the community liaison committee. This requirement is outside the scope of a neighbourhood plan and the text should be amended to encourage discussion on this matter with the committee if one is created.</p>
27	<p>Mitigation Policy TA 1. Transport Assessment and Travel Plan</p> <p>It is a requirement that all development proposals for the strategic site are to be accompanied by a transport assessment and travel plan which contain measures to maximise the number of trips made by non-car modes, and measures to discourage carbased development and this should inform the masterplan. Furthermore, where residual impacts on the highway network are predicted after sustainable transportation measures are taken into account, the Transport Assessment should assess the effect of new</p>	<p>This draft policy replicates wording within the adopted Local Plan. The first sentence of this policy regarding developing transport assessments and travel plan to the satisfaction of Oxfordshire County Council is repeated from the supporting text of the adopted Local Plan (page 153). The second and third sentences replicates point v) in policy STRAT13 of the adopted Local Plan.</p> <p>Paragraph 16 of the NPPF states that plans should 'serve a clear purpose, avoiding unnecessary duplication of policies.' The neighbourhood plan policy seeks to do what is already set out in STRAT13 and in the supporting text to policy TRANS4. It is therefore duplicating existing policy and is not adding any additional detail. It is therefore recommended that this policy is deleted.</p> <p>In the supporting text, the reference to traffic alleviation policies in the Local Plan is not accurate and misleading, this should be amended or deleted. The requirement for the Community Liaison Committee to have input into the Transport Assessment and Travel Plan is outside the scope of a</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>highway infrastructure in mitigating any residual impacts. These Transport Assessments and Travel Plan for LnBB must be completed objectively, to a high standard and that these are overseen by and conducted to the satisfaction of Oxfordshire County Council.</p>	<p>neighbourhood plan and the text should be amended to encourage discussion on this matter with the committee if one is created. Furthermore, input can be achieved via public consultation on the planning application.</p>
28	<p>Mitigation Policy TA 2. Transport Assessment and Travel Plan – Baseline Assumptions</p> <p>The transport assessment modelling should include in its baseline assessment -</p> <ul style="list-style-type: none"> • The population growth forecasts used in the SODC Local Plan 2035 from the 2014 SHMA. • The full impact of the changes in Connecting Oxford, including highways and local roads and village roads • The full impact of the changes in any proposals for 'bus gates' within the City of Oxford or elsewhere in the suburbs including highways and local roads and village roads. • The full impact of any other proposals for reduction of cars within Oxford, including highways and local roads and village roads • The full impact of the development at Barton Park, including highways and local roads and village roads • The full impact of the other proposed strategic developments at Grenoble Road, 	<p>The nature and content of the Transport Assessment is to be agreed with the Local Highway Authority through the Environmental Statement. Furthermore, the Planning Practice Guidance and the National Planning Policy Framework provide detailed guidance on what should be included within the transport assessment and travel plan. It's important to ensure that the requirements within the Policy TA 2 align with the requirements within national policy and guidance and is agreed with the Local Highway Authority.</p>

Ref.	Section/Policy	Comment/Recommendation
	Northfields and Wheatley, including highways and local roads and village roads	
29	<p>Mitigation Policy TA 3. Transport Assessment and Travel Plan – Highway and Road Assessments</p> <p>The transport assessment should include an assessment of the effect of the strategic site on all roads likely to be impacted by the LnBB development. In particular the capacity of the following roads should be assessed before and after the development–</p> <ul style="list-style-type: none"> • The Woodeaton Road • The Elsfield Road • Marsh Lane • The Bayswater Road along its entire length from B4027 • The Shepherd's Pit Road • B4027 • Roads within the villages of Beckley, Stanton St John, Forest Hill, Elsfield and Woodeaton • Roads within the Barton estate with junctions onto the Bayswater Road • The Oxford Ring Road from the Cutteslowe roundabout to the Headington roundabout • The Headington roundabout <p>Access for staff, patients and visitors to the John Radcliffe Hospital site should also be included in the assessment in order to ensure that the effects of the development on access to this facility are mitigated</p>	<p>The adopted Local Plan includes many policies that deal with accessibility and sustainable transport.</p> <p>STRAT 4 says each development will be expected to provide: <i>'appropriate vehicular, cycle and pedestrian access including safe and attractive connections with nearby communities and employment areas'</i></p> <p>The transport policies; TRANS1b: Supporting Strategic Transport Investment, Policy TRANS2: Promoting Sustainable Transport and Accessibility Policies Policy, TRANS4: Transport Assessments, Transport Statements and Travel Plans, and Policy TRANS5: Consideration of Development Proposals also consider accessibility and sustainable modes of transport.</p> <p>The policy appears overly prescriptive and unduly onerous on technicalities of transport assessment.</p> <p>It also refers to areas outside of the designated neighbourhood plan area such as roads/roundabouts and the John Radcliffe Hospital. Neighbourhood plan policies can only apply to areas within the neighbourhood plan area</p> <p>As stated in the comment for Policy TA2 above; the nature and content of the Transport Assessment is to be agreed with the Local Highway Authority through the Environmental Statement. It is also unclear what has informed the list of roads to be assessed for development. It is recommended that this policy is deleted.</p>

Ref.	Section/Policy	Comment/Recommendation
30	<p>Mitigation Policy CM 1. Provision of Construction Management Plans</p> <p>A Construction Management Plan should be provided as part of the supporting information accompanying any planning application.</p> <p>This plan should include, but not be confined to –</p> <ul style="list-style-type: none"> • Noise management – pile driving and other disturbing construction activity should be kept to a minimum. Pile driving in particular at the Barton Park site can be heard in Stowood and for many miles. Hours of permitted operation should be agreed with local residents via the Community Liaison Committee. Noise can be harmful to health. It must be ensured that local residents are not harmed by any noise from construction, can continue to enjoy their gardens and that shift workers are other residents do not have sleep disturbed. • Vibration – this is not only harmful to buildings, but also to local residents. Vibration will arise from pile driving and from construction vehicle movement. It must be ensured that vibration and disturbance is kept to a minimum and a schedule must be agreed with the Community Liaison Committee. • Dust and Airborne Pollutants Management – construction dust can be hazardous to health and cause serious lung and eye disease. Dust and air pollution must be 	<p>The examiner of the Benson Neighbourhood Plan commented on a policy which imposed a requirement as to what documents must be submitted. The examiner in that case commented: <i>"This policy imposes a requirement as to what documents must be submitted with a planning application. That is not something that a neighbourhood plan policy can do. The documents which must accompany planning application will be set out in the District Council's Local Validation Checklist."</i></p> <p>For information, the South Oxfordshire validation checklist is available here.</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>monitored to ensure levels do not become hazardous.</p> <ul style="list-style-type: none"> • Trees and hedgerows should be preserved and protected during construction and afterwards, from damage, dust and pollutants. 	
31	<p>Mitigation Policy TA 4. Compliance with NICE Guidelines on Physical Activity and the Environment and Health Assessment</p> <p>Development should have regard to the NICE guidelines "Physical Activity and The Environment" - [NG90] (shown above) and any updates or reviews. In addition, all strategic site planning applications should be accompanied by a health, mobility, active travel and physical activity assessment.</p>	<p>It is not clear what the scope of a health, mobility, active travel and physical activity assessment is intended to be. STRAT4 of the adopted Local Plan requires strategic development proposals should have a health impact assessment undertaken. Rather than have this policy, it may be more appropriate to have a policy which seeks to influence what should be included within the Health Impact Assessment.</p> <p>We recommend considering rewriting this policy to identify locally distinctive aspects that should be considered as part of the Health Impact Assessment.</p>
32	<p>Mitigation Policy PC. 1. Maintenance of Access and Separation of Footpaths and Bridleways</p> <p>To ensure safety for all cyclists, pedestrians and equestrians all existing footpaths and bridleways must be maintained and kept open and accessible, ensuring that they are not overgrown and passable, during any construction work and afterwards. To ensure safety any crossings that are required to ensure rights of way are not severed by new roads and must be fully protected by either bridges or light controlled crossings to accommodate pedestrians, horse-riders and cyclists. Crossings of site roads for</p>	<p>The first sentence regarding the maintenance of the footpaths is outside the scope of neighbourhood planning. In addition, by saying 'all existing footpaths and bridleways must be maintained and kept open and accessible...', it gives the impression that the policy would prohibit any diversion. During implementation of the development, some paths may need to be temporarily re-routed for safety reasons. A policy preventing this would not be appropriate and would be overly restrictive, and we therefore recommend that further thought is required. The second sentence needs to be reviewed as it appears to be missing some words.</p> <p>The outcome of the type of crossings required will be determined through additional evidence and assessments. This policy should therefore not determine what crossings should be delivered.</p> <p>We recommend thinking about changing the direction of this policy to focus on ensuring that new or diverted routes are designed to maintain their ambience. We also suggest consulting with Oxfordshire County Council as the Local</p>

Ref.	Section/Policy	Comment/Recommendation
	accessibility to houses i.e. bypass or 'Link Roads' should be by pedestrian crossings	Highway Authority on this policy. The policy needs to be worded to ensure the intent of the policy is clearer.
33	<p>Mitigation Policy PC 2. Siting of Pedestrian and Cycle Bridge over A40 Northern Bypass Road and Safety and Crime Reduction</p> <p>Both the current and future residents of Land north of Bayswater Brook in Beckley Parish, which is near the middle of the site, need to have 'connectivity' with Oxford, along the length of the site west to east as set out in the Local Plan. Siting of any bridges or underpasses should have regard to this requirement. The recommendations from "Reducing Crime Hotspots in City Centres" should be implemented to reduce crime and increase safety.</p> <p>Regarding the pedestrian and cycle bridge these measures should include (but not be confined to) –</p> <ul style="list-style-type: none"> • It should be as straight, short and as wide as possible • It should also be well lit, with clear lines of sight so that pedestrians can see what is ahead. Improved lighting to encourage use, but directed downwards so as not to increase light pollution • CCTV • Ambiguous spaces, such as gaps and corners should be avoided as they can provide hiding places for potential offenders and can increase fear of crime. 	<p>Policy STRAT13 of the adopted Local Plan states; <i>'Proposals to develop Land North of Bayswater Brook will be expected to deliver; v) a. provision of high quality pedestrian, cycle and public transport access and connectivity to Oxford City Centre and other major employment locations, particularly the hospitals and Oxford Science and Business Parks, including (but not limited to) the links to and across the A40 Oxford Northern Bypass and a new pedestrian and cycle bridge across the A40 which will require a suitable landing point outside of the allocated site;'</i></p> <p>This draft policy seeks to go above and beyond the level of detail set out in the local plan. The level of detail in regard to the alignment of a new pedestrian and cycle bridge across the A40 has yet to be determined and there no evidence to support the location set out within the draft neighbourhood plan policy. The A40 is also outside of the designated neighbourhood area and therefore this policy would have no effect. We therefore recommend deleting this policy.</p>

Ref.	Section/Policy	Comment/Recommendation
	<ul style="list-style-type: none"> It should be designed so that it can be maintained in good order and monitored on a regular basis 	
34	<p>Mitigation Policy PC 3. Widening of Public Rights of Way For Safety</p> <p>Where existing footpaths and bridleways pass through the proposed development site of Land North of Bayswater Brook they should be widened or maintained to a width to enhance personal safety, allow people to pass each other in different directions and encourage residents to use them, where this would not cause negative biodiversity or landscape impacts.</p>	<p>It is unclear what evidence has been used to justify widening existing footpaths and how this requirement would improve safety or encourage use.</p> <p>The use and design of PROW needs to be carefully considered, in a comprehensive manner, to ensure the aims of the ecological assessment from AECOM are met to mitigate potential harm on the SSSI and would be considered as part of the masterplanning process.</p> <p>Encouraging wide footpaths where appropriate within the neighbourhood could be considered as a community action.</p>
35	<p>Mitigation Policy B 1. Provision of Public Transport</p> <p>The transport package secured to mitigate the delivery of the Land North of Bayswater Brook development shall include measures to ensure that public transport services are integrated with the new development, providing connections to key employment destinations such as the centre of Oxford, Headington, the hospitals and Cowley.</p>	<p>The intent of the policy to ensure that public transport is integrated with the new development and provide connections to key employment centres is already addressed within STRAT 13: <i>'provision of high quality pedestrian, cycle and public transport access and connectivity to Oxford City Centre and other major employment locations, particularly the John Radcliffe Hospital and Oxford Science and Business Parks'</i></p> <p>Paragraph 16 of the NPPF states that plans should <i>'serve a clear purpose, avoiding unnecessary duplication of policies.'</i> The neighbourhood plan policy seeks to do what is already set out in STRAT13 and is therefore duplicating and not adding any additional detail. It is therefore recommended that this policy is deleted.</p>
36	<p>Mitigation Policy LR 1. Compliance with NICE Guidelines – Improving Air Quality</p> <p>Any road through the LnBB development in Beckley Parish should be designed to be compliant with - NICE guideline [NG70]</p>	<p>The NICE guidelines have not been examined, as such the policy cannot require development to be compliant with them. We recommend an amendment to the policy wording so that development 'has regard to the NICE guidelines'.</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>Published date: June 2017 or any updates or reviews. The design of the link road shall be developed taking into consideration the following measures set out in 1.1.2 of the NICE Guidelines -</p> <ul style="list-style-type: none"> • Minimising the exposure of vulnerable groups to air pollution by not siting buildings (such as schools, nurseries and care homes) in areas where pollution levels will be high. • Siting living accommodation away from roadsides. • Avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time. • Including landscape features such as trees and vegetation in open spaces or as 'green' walls or roofs where this does not restrict ventilation. • Including information in the plan about how structures such as buildings and other physical barriers will affect the distribution of air pollutants. 	
37	<p>Mitigation Policy SSSI 1. Report and Assessment Requirements for the SSSI Sydlings Copse and College Pond</p> <p>The development should be informed by a detailed assessment of the effect of the development on the SSSI including</p> <ul style="list-style-type: none"> • The need for buffer zones • A study of visitor numbers to the SSSI to determine the risk. 	<p>The evidence base to the adopted Local Plan includes an ecological assessment from AECOM which sets out what the site needs to do to mitigate effects on the SSSI and we would expect these particular points to be addressed through masterplanning and the planning application process.</p> <p>Policy STRAT13 of the adopted Local Plan requires the SSSI to be protected. It sets out; <i>"Proposals to develop land North of Bayswater Brook will be expected to deliver:</i></p>

Ref.	Section/Policy	Comment/Recommendation
	<ul style="list-style-type: none"> • The likely recreational pressure • Mitigation policies on potential damage from domestic cats • A detailed hydrology survey • A reliable high-quality ecology report • Research pre and post construction on pollutant levels from vehicle emissions as well as particulate matter from tyres etc which are likely to be high from any 'Link Road' with HGVs. • A full Ecological Impact Assessment the methodology stipulated by Natural England and to their satisfaction 	<p><i>vii) a development than ensures that there will be no demonstrable negative recreational, hydrological or air quality impacts on the Sidlings Copse and College Pond SSSI."</i></p> <p>It also states that the masterplan should plan for; "x) a net gain in biodiversity through the protection and enhancement of habitats along the Bayswater Brook, new habitats to the north buffering the Sidlings Copse and College Pond SSSI and offsite Biodiversity enhancements.</p> <p><i>xi) provides a network of green infrastructure that;</i></p> <p><i>b. protects and enhances existing habitats, particularly those associated with Sidlings Copse and College Pond SSSI and the Bayswater Brook</i></p> <p>There is a process to be undertaken before determining if specific mitigation approaches would be the most appropriate. This process would include collecting new evidence and consulting with key stakeholders to help understand and inform the issues and potential solutions to overcome these issues. The impact on the SSSI was discussed during the Local Plan examination and Inspector was satisfied that the site could be delivered, and any outstanding issues could be resolved through the planning application process. We recommend that this policy should be deleted.</p>
38	<p>Mitigation Policy SSSI 2. Implementation of Protection Zone from Roads</p> <p>Any road development within Land North of Boundary Brook will take place only if it can be shown to not worsen air pollution at Sydtings Copse, Wick Copse and College Pond SSSI, and if it is agreed with Natural England and BBOWT". Any associated requirements for monitoring of pollutants and their effects on the SSSI as determined by Natural England</p>	<p>Policy STRAT13 of the adopted Local Plan requires the air quality of the SSSI to be protected. It sets out; "Proposals to develop land North of Bayswater Brook will be expected to deliver:</p> <p><i>vii) a development than ensures that there will be no demonstrable negative recreational, hydrological or air quality impacts on the Sidlings Copse and College Pond SSSI."</i></p> <p>The evidence base to the Local Plan includes an ecological assessment from AECOM which sets out what the site needs to do to mitigate effects on the SSSI and we would expect these particular points to be addressed when the masterplanning for the site is progressed.</p>

Ref.	Section/Policy	Comment/Recommendation
	and BBOWT must be implemented and the costs borne by the developers	This policy both duplicates policy STRAT13 and places an additional burden on the developer. It is unclear whether the policy has been tested for viability. In addition, the impact on the SSSI was discussed during the Local Plan examination and Inspector was satisfied that the site could be delivered, and any outstanding issues could be resolved through the planning application process. We recommend that this policy should be deleted.
39	<p>Mitigation Policy SSSI 3. Agreement of Landscape and Recreational Enhancements</p> <p>A buffer zone of at least 200m is required to protect the fragile SSSI - Sydlings Copse, Wick Copse and College Pond. Further protection will be required in line with any recommendations from hydrology, air quality, ecology and environmental reports to be produced on protecting the SSSI. The design and detailed planting of a buffer and recreational zone around the SSSI should be in keeping with the rural landscape and not appear to be an urban or suburban park. Planting of fruit trees such as apples and indigenous trees would be encouraged in preference to urban trees. The design and planting should be discussed and agreed with the Community Liaison Committee.</p>	<p>It is not clear what the justification for the 200m buffer zone is and where this prescriptive figure came from.</p> <p>The planning application process will identify whether any further information is required and will resolve outstanding issues. It is conjecture to state that further protection will be required. We would recommend deleting the second sentence which starts with 'further protection'.</p> <p>The policy should not set the expectation that the design and planting will need to be agreed with the Community Liaison Committee. This requirement is outside the scope of a neighbourhood plan and the text should be amended to encourage discussion on this matter with the committee if one is created.</p>
40	<p>Mitigation Policy LV 1. Landscaping and Maintaining Important for Wick Farm and Lower Farm</p> <p>The landscape buffer between Wick Farm and the LnBB development must –</p> <ul style="list-style-type: none"> • Maintain existing trees and hedgerows 	<p>This policy largely duplicates Policy STRAT13 which states development:</p> <ul style="list-style-type: none"> 'v) retains and incorporates existing hedgerows and tree belts viii) minimises visual impacts on the surrounding countryside' <p>although there is some additional detail added to the second bullet point. However this bullet point includes the requirement that the strategic site is hidden from view, which is not practical and goes above and beyond what is</p>

Ref.	Section/Policy	Comment/Recommendation
	around Wick Farm and Lower Farm • Provide additional planting of native trees and hedgerows at a density and height and maturity to ensure adequate screening for the residents from the LnBB development and that the LnBB development is hidden.	required within the strategic allocation. We recommend this part of the policy is deleted.
41	Mitigation Policy – LV 2. Maintaining Privacy and Avoiding Overlooking - Building Heights Building heights should not extend above three stories to ensure that: - • Residents of Wick Farm and Lower Farm are not overlooked by the new development and can maintain their privacy • Their views are protected as far as possible • When viewed from the south (Oxford) or north east (Stowood or Stanton St John) or west (Elsfield) visual impact is minimised on the surrounding countryside • It takes into account landform, layout and landscaping • It respects the local context and complements the scale, height and details of the surrounding area	<p>The adopted Local Plan ensures that low density housing will be delivered to the north and west of the site to help mitigate the impact on the landscape. Paragraph 3.107 of adopted Local plan states; <i>"The sensitive areas located to the west and north of the site are not included within the allocation, as they are considered to be of particular significance to Oxford's historic setting. Development should be focused on the lower lying ground on the south and east of the site, which has a greater likelihood to accommodate acceptable development in landscape terms, as it is less visible from the wider area and has higher potential for mitigation to be achieved"</i></p> <p>STRAT 13 also states that proposals will need to minimise the visual impacts of the surrounding countryside</p> <p>To the requirement that building heights should not exceed 3 stories is overly restrictive and unduly onerous. The wider Bayswater Brook allocation adjoins the Barton Development where in some places building heights extend to 4 and 5 stories.</p> <p>The loss of view from an existing dwelling is not a material planning consideration. The Neighbourhood Plan should not set the expectation that these will be preserved.</p> <p>It is recommended that this policy is deleted as the adopted Local Plan makes provision for the housing densities to the north and west of the site to take into account the impact on the landscape.</p>
42	Mitigation Policy – LV 3. Specific landscaping and mitigation for loss of countryside	This policy seeks to mitigate the loss of countryside by requiring a comprehensive landscape strategy. STRAT4 of the adopted local plan requires

Ref.	Section/Policy	Comment/Recommendation
	<p>Applications to develop the land North of Bayswater Brook development site shall be supported by a comprehensive landscaping strategy which ensures that the link road, housing estate roads and the edges of the development including but not confined to around Wick Farm, Lower Farm are appropriately landscaped to avoid impacting adversely on the adjacent countryside and the openness of the Oxford Green Belt. The landscaping should include Sustainable Urban Drainage Systems where appropriate, to help reduce flooding and maintain water quality in adjacent waterbodies. The strategy should include provision for access by walking. Horse riding and cycling.</p>	<p>that proposals for strategic development should be accompanied by a landscape and visual impact assessment.</p> <p>STRAT13 of the Local Plan also states the following; <i>'Proposals will be expected to deliver a masterplan that has been informed by detailed landscape, visual, heritage and ecological impact assessments and demonstrates an appropriate scale, layout and form that:</i></p> <ul style="list-style-type: none"> <i>iv) provides a permanent defensible Green Belt boundary around the allocation and a strong countryside edge;</i> <i>v) retains and incorporates existing hedgerows and tree belts, particularly where this assists with the creation of a new Green Belt boundary;</i> <i>vii) respects and avoids harm to Oxford's historic setting;</i> <i>viii) minimises visual impacts on the surrounding countryside;</i> <i>ix) provides a network of green infrastructure'</i> <p>Paragraph 16 of the NPPF states that plans should <i>'serve a clear purpose, avoiding unnecessary duplication of policies.'</i> The neighbourhood plan policy seeks to do what is already set out in STRAT4 and STRAT13 and is therefore duplicating and not adding any additional detail. It is therefore recommended that this policy is deleted.</p>
43	<p>Mitigation Policy LV 4. Avoiding Hard Urban Edges</p> <p>The Land north of Bayswater Brook development should be designed to contain low density edges to the housing areas. These should be landscaped appropriately to minimise the risk of visual impacts arising from the development and to mitigate the effects of the development on the adjacent countryside and the openness of the Green Belt.</p>	<p>This policy seeks to mitigate the visual impact arising from the development on the adjacent countryside and the Green Belt. Requirements within STRAT13 ensures that the masterplan will be planned to mitigate the impact which duplicates the intention of this policy.</p> <p>Points iv), v), viii) and ix) of STRAT13 require the development to; provide a permanent defensible green belt boundary around the allocation and a strong countryside edge, retains and incorporates existing hedgerows and tree belts particularly where this assist with the creation of a new Green Belt boundary, minimises visual impacts on the surrounding countryside, and reduce densities towards the northern landscape buffer and will be lower close to Sidlings Copse and College Pond SSSI.</p>

Ref.	Section/Policy	Comment/Recommendation
		The neighbourhood plan policy does not provide any additional detail than what is in STRAT13. Paragraph 16 of the NPPF states that plans should ' <i>serve a clear purpose, avoiding unnecessary duplication of policies.</i> ' It is therefore recommended that this policy is deleted.
44	<p>Mitigation Policy LV 5. Design in sympathy with the landscape and surroundings</p> <p>The design quality of the site overall and the individual neighbourhoods should maintain and enhance existing landscape features with prevailing character of the Oxford Heights landscape character area and the Character Assessment for the Wick Farm Area Evidence Base 2- 2.11.7 and Appendix 14</p>	<p>It will not be possible to implement this policy to the whole site as parts of the allocated site at Bayswater Brook falls outside the designated neighbourhood plan area.</p> <p>Furthermore, the requirement to maintain and enhance goes above and beyond Local Plan policy ENV1. Policy ENV1 requires maintain and where possible enhance.</p>
45	<p>Mitigation Policy – H 1. Archaeological Site Survey</p> <p>The land North of Bayswater Brook development proposal should be supported by further archaeological assessment, as required by the County Council Archaeologist. Further on-site archaeological investigation will be required throughout the development. Where mitigation is required, the findings shall describe how this will be achieved and whether that mitigation will be on-site (preservation in situ) or off-site removal of important artefacts.</p>	<p>STRAT13 of the adopted local plan requires a scheme of appropriate mitigation should be established, to include the physical preservation of significant archaeological features and their setting. Policy ENV9 of the local plan requires applicants to undertake an assessment of appropriate detail and how the development should address the findings of the assessment. The draft neighbourhood plan repeats policy ENV9 and loses important detail set out within ENV9.</p> <p>Paragraph 16 of the NPPF states that plans should '<i>serve a clear purpose, avoiding unnecessary duplication of policies.</i>' The neighbourhood plan policy seeks to do what is already set out in policy ENV9 and is therefore duplicating and not adding any additional detail. It is therefore recommended that this policy is deleted.</p>

Ref.	Section/Policy	Comment/Recommendation
46	<p>Mitigation Policy HAP 1. Air Quality Assessment and Mitigation</p> <p>Applications for development shall be accompanied by technical information identifying nearby habitats and species that are sensitive to air pollution, and setting out a management regime to protect them from air pollution from the development. This should include regular monitoring of air quality and the Oxford Air Quality Management Area should be extended to Land north of Bayswater Brook.</p> <p>Air pollution can cause serious disease, especially to the lungs, heart and skin. There should be compliance with NICE guidelines on Air pollution: outdoor air quality and health NICE guideline [NG70] Published: 30 June 2017 and any updates and reviews to minimise disease and improve local health profiles.</p>	<p>STRAT 4 and STRAT13 of the Adopted Local Plan ensures that an Air Quality Screening Assessment will need to be undertaken and appropriate air quality mitigation is delivered for the strategic development at Bayswater Brook. It is important that a list of relevant issues and mitigation are identified through a robust process. In our opinion the Air Quality Screening Assessment is the correct process. We recommend the wording of Policy HAP1 is amended to align more closely with Policies STRAT4 & STRAT13 and identify the local considerations the Air Quality Screening Assessment should consider.</p> <p>The area covered by an AQMA is decided through a different process and cannot be amended as part of a neighbourhood plan policy. This requirement should be deleted.</p> <p>The final part of the policy is more suited to supporting text, furthermore the NICE guidelines have not been examined as such the policy cannot require development to be compliant with them. We recommend either deleting the policy or removal of the other requirements alongside an amendment to the policy wording so that development 'has regard to the NICE guidelines'.</p>
47	<p>Mitigation Policy HAP 2. Indoor Air Quality</p> <p>Indoor air quality is an important component of health, and severe disease can develop from poor air quality both outdoor and indoors. Some people such as those with existing lung, heart and skin diseases are particularly vulnerable, as are pregnant women, babies and the elderly.</p> <p>The opportunities to incorporate design in the new LnBB development to reduce indoor</p>	<p>The initial part of the policy is more suited to supporting text. Furthermore the NICE guidelines have not been examined as such the policy cannot require development to be compliant with them. We recommend an amendment to the policy wording so that development 'has regard to the NICE guidelines'.</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>air pollution should not be lost. New buildings and refurbishments of existing buildings should comply with "Indoor air quality at home" - NICE guideline [NG149] Published: 08 January 2020 and any updates and revisions.</p> <ul style="list-style-type: none"> • Building materials should be specified that only emit a low level of formaldehyde and VOCs (volatile organic compounds). • Heating systems should be specified that minimise indoor exposure to particulate matter. • Designs should include provision for removing indoor air pollutants. • Ventilation systems should be designed to reduce or avoid exposure to outdoor air pollution and ensure there is permanent, effective ventilation. 	
48	<p>Page 44 Community aspirations</p> <p>A coordinated scheme for the design, painting, fixing and siting of street furniture should also be considered.</p>	<p>Colleagues in our Equalities and Inclusivity team have made the below comment:</p> <p>Where there is mention about street furniture, it may be worth considering the height of seats/benches and that they have arm rests if possible, so users can use the arms to aid them when standing. We have information on inclusive street furniture and will happily share should it be needed.</p>
49	<p>General Comment on community aspirations</p>	<p>Colleagues in our Infrastructure team have made the below comment:</p> <p>We would very much encourage that Beckley and Stowood Parish Council considers providing more content about the use of developer contributions by creating a list of infrastructure spending priorities. The list could be contained either within the Neighbourhood Plan or be a stand-alone document. The list should explore how the CIL funding can be used to deliver the infrastructure identified as required, to address the demands of development (we understand</p>

Ref.	Section/Policy	Comment/Recommendation
		that this list might change over time for which the necessary flexibility is provided within CIL Regulation). The list will help the parish council to audit existing facilities and identify joint opportunities, capture opinion of needs and wants of the residents, etc to achieve the best use of funding sources for the benefit of the community.

APPENDIX 8. NATIONAL CONSULTEES

APPENDIX 8.1. NATURAL ENGLAND

Date: 14 September 2022
Our ref: 403604
Your ref: Beckley and Stowood Neighbourhood Plan



Ms Ginette Camps-Walsh
Chairman
Beckley & Stowood Neighbourhood Plan Steering Committee

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

BY EMAIL ONLY
g.camps-walsh@beckley-and-stowood-pc.gov.uk

T 0300 060 3900

Dear Ms Camps-Walsh

Beckley and Stowood Neighbourhood Plan - Second Pre-Submission Amended Neighbourhood Plan and SEA

Thank you for your consultation request on the above dated and received by Natural England on 1 August 2022.

At this time, Natural England is not able to fully assess the potential impacts of this plan on statutory nature conservation sites or protected landscapes or, provide detailed advice in relation to this consultation. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.

The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the deciding authority to determine whether or not the plan is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the impacts of the plan on the natural environment to assist the decision making process.

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Yours sincerely

APPENDIX 8.2 HISTORIC ENGLAND



Historic England

To whom it may Concern

Our ref: PL00245949

07-09-22

Dear Sir/madam,

Ref: Beckley and Stowood Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Beckley and Stowood Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local authority's planning and conservation advisers, and if appropriate the Historic Environment Record at your local County 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,

Business officer



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

Telephone 020 7973 3700
HistoricEngland.org.uk



APPENDIX 8.3. NATIONAL GRID



Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

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

avisonyoung.co.uk



Our Ref: MV/ 15B901605

14 September 2022

Beckley and Stowood Parish Council
g.camps-walsh@beckley-and-stowood-pc.gov.uk
via email only

Dear Sir / Madam
**Beckley and Stowood Neighbourhood Plan – Pre-Submission Consultation
August-September 2022
Representations on behalf of National Grid**

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

About National Grid

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

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

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

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

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

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

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

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

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

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



Distribution Networks

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

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

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



Director

nationalgrid.uk@avisonyoung.com

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



Town Planner

box.landandacquisitions@nationalgrid.com

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

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

Yours faithfully,

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

Electricity assets

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

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

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

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

Gas assets

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

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

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

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS

APPENDIX 8.4. CPRE

From: <administrator@cpreoxon.org.uk>
Sent: 31 August 2022 10:32
To: g.camps-walsh@beckley-and-stowood-pc.gov.uk
Subject: RE: Beckley and Stowood Neighbourhood Plan Pre-Submission Public Consultation ends 4th September

Dear Ginette

Thank you for sharing your neighbourhood plan with us. We are pleased to see the policies on the environment, important views and dark skies. I came across this document from the South Downs national park and wondered if there were any design aspects regarding reduction of visible light transmittance that you may wish to consider for this plan, or when the plan is reviewed.

<https://www.southdowns.gov.uk/wp-content/uploads/2021/06/DNS-TAN-2021-Appendix-Glazing-Internal-Light.pdf>

Kind regards

Branch Administrator
Mon, Wed: 9.00-3.00
T: 01491 612079
E: administrator@cpreoxon.org.uk | cpreoxon.org.uk
facebook.com/CPREOxfordshire | [Twitter@CPREOxfordshire](https://twitter.com/CPREOxfordshire)



The countryside charity
Oxfordshire

Campaigning to protect our rural county

20 High Street, Watlington, Oxon OX49 5PY

APPENDIX 9. LAND OWNERS – PEGASUS GROUP FOR CHRIST CHURCH AND SITE PROMOTERS OF LAND NORTH OF BAYSWATER BROOK



SHF/PI9-0856

13th September 2022

Ginette Camps-Walsh
Royal Oak House,
Stowood,
Beckley
OX3 9TY.

By email only camps.walsh@btinternet.com

Dear Ms Ginette Camps-Walsh

Beckley And Stowood Neighbourhood Plan – Second Pre-Submission Public Consultation Reg 14 July 2022 and the Strategic Environment Assessment– August 2022

Pegasus Group have been instructed by our clients Dorchester Residential Management Group and Christ Church Oxford to submit representations to the Reg 14 Beckley and Stowood Neighbourhood Plan consultation.

We have reviewed the Neighbourhood Plan (NP) and its evidence base and have some significant objections regarding the NP and the accompanying Strategic Environmental Assessment (SEA) which are set out in the completed Survey Form attached to this letter.

It is important to underline the significance of our representations as it is considered that the Neighbourhood Plan as currently drafted does not meet the Basic Conditions.

- The NP does not acknowledge the planning context in which the NP is being prepared, i.e., that the Local Plan for South Oxfordshire District Council was adopted in December 2020 and includes the land allocated in Policy STRAT13 Land North of Bayswater Brook (LNBB). In many places it refers to policies which have been superseded by the adopted SODC Local Plan. The NP does not satisfy the Basic Conditions as it is not in general conformity with the adopted Local Plan. (PPG Neighbourhood Planning Basic Conditions ref Paragraph: 065 Reference ID: 41-065-20140306)
- The NP should confine itself to non-strategic matters in accordance with the NPPF 2021 and the PPG Neighbourhood Plans. It should support the delivery of strategic policies contained in the SODC adopted Local Plan and shape and direct development that is outside of these strategic policies. The NP PPG is clear that *"Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies"*

Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, GL2 1RT
T 01285 641717 E Cirencester@pegasusgroup.co.uk
Offices throughout the UK and Ireland.

Pegasus Group is a trading name of Pegasus Planning Group Limited (01779000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester (Gloucestershire GL2 1RT)

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE





and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy.” Paragraph: 005 Reference ID: 41-005-20190509 (My emphasis)

- The PPG Neighbourhood Planning states at Paragraph: 044 Reference ID: 41-044-20190509 “...The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy.” (my emphasis)
- It is considered that the policies that are included in the Beckley and Stowood NP often repeat or undermine those that are included in the adopted SODC Local Plan and propose unnecessary detail insofar as they would adversely affect the delivery of LNBB. Pegasus consider that such policies cannot be justified and in particular Section 6 of the NP should be deleted as it does not support the strategic allocation of LNBB in Policy STRAT13 in the adopted SODC Local Plan, instead as currently drafted it seeks to undermine the Local Plan allocation and its delivery. Consequently, an objection is made to the NP, as in our view it fundamentally seeks to undermine the implementation of the adopted Local Plan in respect of Policy STRAT13 LNBB, in doing so it fails to comply with the basic conditions.
- The NP should be redrafted and confine itself to areas of the Parish beyond the strategic allocation of LNBB (which is covered by policies in the adopted Local Plan). The NP should focus on the village of Beckley and land that is not included in the strategic allocation at LNBB.
- The NP should not attempt to address matters beyond the Parish, it should only be concerned with the area within its NP boundary as agreed with SODC and not with other sites in the Green Belt in neighbouring parishes or highway matters beyond the NP.
- The NP should not refer to emerging plans in respect of the preparation of the planning application for LNBB. The Parish Council and the NP Steering Group will be aware that the planning application is being prepared, consequently it is in appropriate and misleading to refer to plans that are “work in progress.”
- The Parish Council along with local residents have been consulted on the preparation of the planning application and will be formally consulted by SODC once the application is submitted.
- It is considered that the process of preparing the SEA is not transparent. It is not clear how any reasonable alternatives have been assessed for the now 23 mitigation policies. The only reasonable alternatives referred to in the SEA are those set out in Section 7 which focuses on the settlement boundary/village boundary, link road and rat runs, footpath changes, protection zone from roads, building heights.



To conclude the NP does not meet the basic conditions, it does not have sufficient regard to national or local policy. As currently drafted with 23 policies, supposedly included to mitigate the development of the allocated site a LNBB, the NP is not considered to be in general conformity. It is obvious from the start of the documentation that the authors of the NP object to the allocation of LNBB, and instead of supporting the allocation, the NP includes an unnecessary amount of detail which seeks to undermine the delivery of the LNBB. Many of the points raised are in principle already covered by the policies in the adopted Local Plan and the validation requirements for the preparation of a planning application.

We would be happy to meet with the Parish Council/NP Steering Group to discuss our more detailed comments set out in our submission.

Yours sincerely

Regulation 14 Pre-Submission Public Consultation on Beckley & Stowood Neighbourhood Plan and Strategic Environmental Assessment - August '22

Introduction

Residents of Beckley and Stowood Parish agreed at a public meeting in January '16 to develop a Neighbourhood Plan. This will have legal standing and will give us more say about how we want our village to look and develop. It must be taken into account in future planning decisions, such as building on the Green Belt.

The Neighbourhood Plan Steering Group has used the feedback from our public meetings and previous consultations to develop this draft Neighbourhood Plan.

The Neighbourhood Plan for the Parish of Beckley & Stowood seeks to build upon the existing Policies and Plans already in place for South Oxfordshire District Council. It does not seek to contradict any of these, but rather to augment them to reflect the local conditions affecting the broader village community.

The Parish Council and Steering Group ran a previous consultation from 1st December to 24th February '18. the feedback was noted and acted upon. It is now required to run another consultation on the Strategic Environmental Assessment Report and the updated Neighbourhood Plan. The consultation will run from Monday 1st August to Wednesday 14th September. It is very important that the Neighbourhood Plan reflects the aspirations of our local community, developed with your help. We would be grateful for any comments you have.

Please complete this on-line survey or alternatively e-mail the completed survey to us with your comments or post to Ginette Camps-Walsh Royal Oak House, Stowood, Beckley OX3 9TY. If you have any queries please do not hesitate to contact Ginette - camps.walsh@btinternet.com 351762 (All responses from individuals will be non-attributable and in line with the parish council's privacy notice published on the web site.)

1. Please enter below

Your name	
Your address	Pegasus House, Pegasus Group, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
Your organisation (if a business Or statutory consultee)	Pegasus Group

2. Please indicate in what capacity you are responding to this consultation -

- ☐ Resident of Beckley and Stowood Parish
- ☒ Land Owner, but non-resident of the Parish
- ☐ Business or organisation operating in the Parish
- ☐ Statutory Consultee (e.g. Thames Water)
- ☐ Neighbouring parish, city or district council
- ☒ Developer
- ☐ Other (please specify)

Pegasus Group is instructed on behalf of our clients Christ Church and Dorchester Residential Management to respond to the consultation on the Neighbourhood Plan Reg 14

3. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents. Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	Introduction
------------------------------	--------------

Page number	9
-------------	---

4. Please enter your comments below -

Introduction – 3rd paragraph (there are no numbered paragraphs throughout the plan)

It is noted that this is the second version of the Reg 14 Neighbourhood Plan that was originally consulted upon from 1st December 2017 – 24th February 2018. Since then, the South Oxfordshire Local Plan 2035 has been subject to examination and was adopted in December 2020.

The introduction does not acknowledge the planning context in which the Neighbourhood Plan is being prepared, i.e., that the Local Plan for South Oxfordshire District Council was adopted in

December 2020 and includes the land allocated in Policy STRAT13 Land North of Bayswater Brook. This is one of the basic conditions that the NP needs to satisfy in order to proceed.

There is no need to include a strategic allocation from the adopted LP in the NP. The NP should confine itself to non-strategic matters. It should support the delivery of strategic policies contained in the SODC adopted Local Plan and shape and direct development that is outside of these strategic policies. The NP PPG is clear that *"Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy."* Paragraph: 005 Reference ID: 41-005-20190509 (My emphasis).

The third paragraph of the introduction refers to other proposals in the Green Belt in neighbouring parishes, however, the Beckley and Stowood Neighbourhood Plan should only be concerned with the area within its NP boundary as agreed with SODC and not with other sites in the Green Belt in neighbouring parishes.

This is a significant point as part of LNBB lies within neighbouring parishes, consequently a consistent approach is to be taken towards its development based on the policies in the adopted Local Plan. It would not be appropriate to include overly detailed policies that apply to only one part of the site. The NP should therefore confine itself to areas beyond LNBB as this is a strategic allocation and its development and implementation is addressed in the adopted Local Plan.

It is noted that the NP Consultation Report dated June 2022 refers to the previous consultation in 2018 at this stage Land North of Bayswater Brook was not included in the NP (OCC in their response to the Parish Council dated 23rd February 2018 point out that landowners were identifying land for further development in the Wick Farm/Bayswater/Lower Elsfield area and that the NP needed to be updated to reflect the emerging position of the SODC Local Plan. The response from SODC dated 14th February made no reference to LNBB).

Consequently, it appears that SODC have until now not commented on the proposed mitigation policies in the second version of the Reg 14 NP (there are 23 policies that relate to the mitigation of the Local Plan strategic allocation of LNBB, Policy STRAT13). It is reported in the SEA that SODC commented on the policies in May 2021, but there is no evidence of any correspondence to this effect. The only correspondence is the Screening Statement of 19th May 2021 which did not review the policies in the emerging NP. Furthermore, the Screening Opinion from SODC dated 19th May 2021 does not comment on the principle of including the policies, the Opinion only comments on the affect and concludes that given the scale of development that is affected by these policies, the effects on the environment, whilst could be potentially positive, are likely to be significant and therefore an SEA is required.

It is also noted that at paragraph 16 of the Screening Opinion that *"The draft NDP also contains a policy on building heights which states that buildings should not extend above three stories. A restriction on the height, which is not a requirement in the strategic policy, could result in the developable area being expanded and without a full SEA, it would not be possible to rule out that this would likely to have a significant environmental effect."* (my emphasis).

Paragraph 17 of the Screening Opinion acknowledges that the *"proposals within the draft NP go beyond what is required in the strategic policy, it would not be possible to rule out that these draft policies would not have an environmental effect without a full SEA."*

Paragraph 18 states: *"These policies seek to affect a development of significant proportions and seek to go further than the requirements set out in the Local Plan 2035."* (my emphasis)

Although these comments were made in May 2021 and do not relate to the latest Reg 14 version of the NP they are nevertheless important considerations in respect of the latest Reg 14 which is the subject of the current consultation.

5. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
Section number and sub-title	Section 1. Section 1.1 How the Neighbourhood Plan fits into the Planning system (Page 10) Section 1.2 What Is A Neighbourhood Planning? (Pages 11-12) Section 1.4 History Of The Beckley And Stowood Neighbourhood Plan
Page number	10, 11-12 and 14

6. Please enter your comments below –

Section 1.1 How the Neighbourhood Plan fits into the Planning system (Page 10)

The NP does not satisfy the Basic Conditions as it is not in general conformity with the adopted Local Plan. (PPG Neighbourhood Planning Basic Conditions ref Paragraph: 065 Reference ID: 41-065-20140306)

Reference is made to policies that no longer exist, policies of the Core Strategy and previous Local Plan have been superseded by the adopted South Oxfordshire Local Plan 2035.

The South Oxfordshire Local Plan 2035 was adopted at a meeting of Full Council on 10 December 2020. It now forms part of the development plan for the district and replaces the South Oxfordshire Local Plan 2011 and Core Strategy (2012).

Paragraph 1.12 of the adopted LP is clear as to what constitutes the development plan – the only policies that are saved are referred to in paragraph 4.9 and these are previously allocated sites in the Core Strategy and previous Local Plan which will continue to be saved.

Appendix 14 lists what were saved or partially saved LP policies from the LP 2011 and the CS 2012 and explicit states which policies replace those policies – **there are no saved policies.**

The NP should focus on implementing the policies of the adopted Local Plan 2035.

NPPF paragraph 13 states: – “*Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.*”

Neighbourhood Plans should only include non-strategic policies.

The PPG on Neighbourhood Planning Paragraph: 044 Reference ID: 41-044-20190509 states under the heading:

“Can a neighbourhood plan allocate additional or alternative sites to those in a local plan?”

*“A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy. **Neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans.**”*

*...The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. **National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy.** (My emphasis)*

Para 29 of the NPPF states that: – “Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies¹⁸.

¹⁸ Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.”

The Planning Practice Guidance on Neighbourhood Planning states at paragraph: 036 Reference ID: 41-036-20190509

“A neighbourhood area can include land allocated in strategic policies as a strategic site. Where a proposed neighbourhood area includes such a site, those wishing to produce a neighbourhood plan or Order should discuss with the local planning authority the particular planning context and circumstances that may inform the local planning authority’s decision on the area it will designate. A neighbourhood plan must be in general conformity with, and plan positively to support, the strategic policies of the development plan.” (my emphasis)

The only comments from SODC (February 2018) predate the adoption of the Local Plan which included STRAT13 and the Screening Statement on the determination of the need for an SEA (May 2021). The Neighbourhood Planning Officers of SODC are listed in the acknowledgments to the plan, but it is not clear exactly what their involvement has been in the preparation of the latest version of the Reg 14 NP.

The PPG Neighbourhood Planning Paragraph: 074 Reference ID: 41-074-20140306 explains what is meant by ‘general conformity’.

“When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
- the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
- the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach.”*

It is considered that the policies that are included in the Beckley and Stowood NP often repeat or undermine those that are included in the adopted SODC Local Plan and propose unnecessary detail

in so far as they would adversely affect the delivery of Land North of Bayswater Brook, such policies cannot be justified and should be deleted as they fail to comply with the basic conditions.

As far as the NP is concerned the key point is that policies that are included in the NP can provide additional detail and/or a distinct local approach to that set out in the LP without undermining that policy.

The NP Basic Conditions listed on page 10 includes compliance with Green Belt legislation – the policy for green belt is covered in the NPPF see explanatory note for basic condition a), in the list of basic conditions in the PPG, there is no need for this to be listed as a separate basic condition.

The NP should be in general conformity with the Adopted Local Plan i.e., same plan period to 2035 and not extend beyond to 2037.

Section 1.2 What Is A Neighbourhood Planning? (Pages 11-12) should read What is a Neighbourhood Plan? or What is Neighbourhood Planning?

All quotes from the PPG should be referenced.

The PPG on Neighbourhood Planning provides advice so that a community can ensure its neighbourhood plan is deliverable.

"Plans should be prepared positively, in a way that is aspirational but deliverable. Strategic policies in the local plan or spatial development strategy should set out the contributions expected from development. This should include the levels and types of affordable housing required, along with other infrastructure. Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy. Further guidance on viability is available." (my emphasis)

Paragraph: 005 Reference ID: 41-005-20190509

The Neighbourhood Plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework). It is within this broad context, that the NP should be prepared.

"Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion

document or annex), and it should be made clear in the document that they will not form part of the statutory development plan." Paragraph: 004 Reference ID: 41-004-20190509

The NP fails to do this instead aspirations are interspersed within the text of the NP, these should be in an appendix or a separate document.

The NP should focus solely on the Parish of Beckley and Stowood as defined and agreed with SODC in the letter of 6th June 2016 and associated Map 1 (*"This designation has been made for the purposes of preparing a Neighbourhood Development Plan by Beckley and Stowood Parish Council under section 61G (1) of the Town and Country Planning Act 1990 as amended"*). Therefore, the NP should not refer to neighbouring parishes or their views on development.

The fourth and fifth paragraphs on page 12 should be deleted and amended to be clear that: Once the Neighbourhood Plan is "made" it becomes part of the development plan. Planning applications are decided in accordance with the development plan unless material considerations indicate otherwise. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it.

Those preparing the Neighbourhood Plan should be under no illusions, as the NP has to be prepared in general conformity with the adopted Local Plan, this is part of the basic conditions which the NP has to satisfy in order that it can proceed and be successful at independent examination.

The NPPF para 29 clearly states that:

"Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies." (my emphasis)

It is considered that the policies included in the NP in so far as they relate to LNBB seek to undermine the strategic policies of the adopted Local Plan as they relate to the strategic allocation of LNBB and consequently undermine the delivery of the site.

Section 1.4 HISTORY OF THE BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN (Page 14)

This section needs to be updated to explain the stages and timetable for the preparation of the NP.

- Regulation 14 consultation took place Dec 2017 – February 2018
- A second Reg 14 consultation is currently taking place 1st August 2022 – 14th September 2022.
- "After this consultation the Steering Group will incorporate comments and feedback into the Plan. The amended Plan will then be submitted to South Oxfordshire District Council [SODC],

who will run another public consultation.” This should be referred to as the Reg 16 consultation.

- The Plan will then go to an Independent Examiner.
- The Examiner’s recommendations will then be incorporated into the Plan or revisions may be called for.
- The final version of the Plan will then be put to a local referendum and if more than 50% support the NP will be “made” and becomes part of the development plan.

7. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	Section 3 Consultations and Community Engagement
------------------------------	--

Page number	16
-------------	----

8. Please enter your comments below –

Consultation and Engagement should be included in an appendix.

The basic starting point for the NP, should be clearly expressed under the sub-title “Issues for the Neighbourhood Plan”

The basic starting point is that the adopted SODC LP removes land from the GB in STRAT13 LNBB and provides the policy framework for the determination of the planning application.

It is considered that the paragraph should be rephrased to read as follows:

“The most important issue for the Neighbourhood Plan was preservation of the Green Belt [84%],”
Delete the following words “since there had been a number of threats to build on Wick Farm and other fields south of the B4027”

There appears to have been no engagement with SODC since February 2018 (apart from the Screening Statement of 19th May 2021) and the only engagement with Oxfordshire County Council is again February 2018 and predates the Local Plan examination in 2020 and more recent changes to

transport policy including the adoption in July 2022 of the Oxfordshire Local Transport and Connectivity Plan.

9. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	Section 4 A vision for Beckley and Stowood
------------------------------	--

Page number	20
-------------	----

10. Please enter your comments below –

--

11. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	Section 4 A vision for Beckley and Stowood 4. VISION STATEMENT AND CORE OBJECTIVES (Page 20) Core Objectives (Page 21) 4.5 Sustainable New Development (Page 22) 4.7 Reducing The Harm To The Environment And Residents From Development at Land North Of Bayswater Brook (Page 23)
------------------------------	---

Page number	20, 21, 22, 23
-------------	----------------

12. Please enter your comments below –

4. Vision Statement And Core Objectives (Page 20)

The first paragraph refers to two main settlements – but only identifies Beckley.

Second paragraph and first bullet point of the vision should be written in order to be consistent with national and local policy (NPPF para 8 and para 174) i.e.

Delete “preserve” and include – “to *protect and enhance our natural built and historic environment*”

Fifth bullet point “*New developments should be built to the highest energy conservation standards and retrofitting of existing buildings is encouraged, working towards conserving energy being carbon neutral.*” The NP needs to be consistent with national policy and the adopted SODC Local Plan.

Seventh bullet point on page 20 should be deleted and redrafted.

The views of the local residents should be reported in the Appendix on consultation and engagement. The bullet point should be redrafted in a positive context reflecting the adopted SODC LP. The LNBB is an allocated site and as such is expected to deliver the necessary housing to meet the SODC housing needs and part of the unmet needs of Oxford City. The land was removed from the Green Belt through the LP. This was discussed at length during the local plan examination and all representations considered by the Planning Inspector on behalf of the Secretary of State, as such a planning application is now being prepared (the Parish Council will be well aware of this and the consultation that has taken place to date) in accordance with the policies in the adopted Local Plan.

Policies in the NP have to be in conformity with the development plan. The PPG on Neighbourhood Planning states: “*A neighbourhood plan must be in general conformity with, and plan positively to support, the strategic policies of the development plan.*”

Paragraph: 036 Reference ID: 41-036-20190509

“*Neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans.*”

“*The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the*

delivery of a strategic site allocated for development in the local plan or spatial development strategy.” (My emphasis).

Paragraph: 044 Reference ID: 41-044-20190509

Core Objectives (Page 21)

“Objective 6 Encouraging Housing Mix” Is not consistent with the SODC LP as there is no reference to affordable housing. Policy STRAT13 states that affordable housing is to be included in the mix of dwellings in accordance with Policy H9.

“Objective 7. Reducing the Harm to the Environment and Residents from Development at Land North of Bayswater Brook”. This should be redrafted in a more positive light e.g., reflecting the policies of the adopted SODC LP and in particular the Policy STRAT13 LNBB. The principle of development has already been accepted in the adopted Local Plan and the appropriate policy framework to guide development is in place.

The SEA prepared for the Neighbourhood Plan at Section 6 (page 34) states that the vision and objectives of the Neighbourhood Plan: *“are very critical of development at Land North of Bayswater Brook which would provide homes in the south of the parish.”*

4.5 Sustainable New Development (Page 22)

“As part of this initiative residents wish to promote sustainable new development to the highest standards of energy efficiency to become carbon neutral. This objective also extends to existing houses to encourage them to retrofit and introduce new energy generation such as solar panels and supporting sustainable transport such as cycleways”

It should be noted that the standards of energy efficiency will be those that are consistent with the Local Plan and national policy.

4.7 Reducing The Harm To The Environment And Residents From Development at Land North Of Bayswater Brook (Page 23)

The last sentence of the first paragraph under this heading should be deleted. *“All the local parishes will do their utmost to ensure that this development does not progress. Please see Evidence Base 2 3.2.6.”*

As stated earlier in our representations the NP has to be in general conformity with the adopted SODC LP, LNBB is an allocated site in the adopted LP to meet housing needs. The objections to development have already been heard at the SODC LP examination and policies are in place in the

now adopted LP to guide the development. The Parish Council will have the opportunity to comment on the planning application when it is submitted to SODC in due course.

It is not for this NP to articulate the views of other neighbouring parishes.

It appears that the paragraphs under the heading of 4.7 have not been updated since the previous Reg 14 consultation, although the Parish Council website clearly states that the NP has been amended, modified and additions have been made to policies as follows:

- *"The settlement boundary has been changed in line with feedback received*
- *New policies on the environment, important views, dark skies*
- *New mitigation policies to protect our parish and parishioners, as far as possible, from potentially negative effects of the development at Land north of Bayswater Brook"*

In which case, from the way in which the NP is written, it is evident that there are still tensions to the extent that there are underlying objections to the development of LNBB and what could be considered to be a refusal to acknowledge the policies in the adopted Local Plan including the allocation of the site. It is considered that the text of the NP should be updated to reflect the adopted Local Plan – this is necessary in order to satisfy the basic conditions in order for the NP to proceed.

"National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy." PPG
Neighbourhood Planning ref Paragraph: 044 Reference ID: 41-044-20190509

Consequently, the second paragraph which starts:

"There is a great risk that this proposed development will do irreparable damage to the important SSSI sites of Sydlings Copse and College Pond, biodiversity corridors and important landscape used for recreation...."

this should be deleted, the LNBB site is now allocated in the adopted Local Plan, consequently this paragraph needs to be redrafted in that context.

To date the applicants preparing the planning application for LNBB have undertaken the following consultation:

Public Consultation

- First stage of public consultation – 3rd March – 31st March 2022 (two in person events, two online webinars)
- Second stage of public consultation – 29th June – 31st July 2022 (two in person events, one online webinar).

Enquiry by Design Process

- 27th January 2021: Workshop One – Enquiry by Design Kick-Off Event
- 2nd February 2021: Workshop Two – Landscaping and visual; heritage; flooding and water management and ecological constraints.
- 4th February 2021: Workshop Three – Transport
- 8th February 2021: Workshop Four – Community facilities and integration with Barton
- 15th October 2021: Workshop Five – Enquiry by Design wrap-up

Design Review Panels

- January 2021
- February 2022

Meetings with Local Communities

- Meetings with a number of Parish Council's, (Woodeaton, Risinghurst, Beckley and Stowood, Elsfield, Forest Hill and Marston have now been held)
- Meeting with Wick Farm Park residents
- Set up a community/neighbour meeting group.
- Met with a range of stakeholders.

Online discussions with the local planning authority, Oxfordshire County Council, Oxford City Council, statutory consultees such as the Environment Agency, Natural England, Berks, Bucks & Oxon Wildlife Trust (BBOWT).

In accordance with the adopted Local Plan and the Council's Validation checklist all the necessary supporting evidence/assessments/reports are being prepared.

13. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents. Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
Section number and sub-title	Section 5 NEIGHBOURHOOD DEVELOPMENT PLAN POLICIES (Page 24)
Page number	24

14. Please enter your comments below -

<p><u>Section 5 NEIGHBOURHOOD DEVELOPMENT PLAN POLICIES (Page 24)</u></p> <p>This section of the NP needs to be revised and written in the context of the adopted SODC LP in order to satisfy the basic conditions (there are no saved policies from previous plans - see appendix 14 of the adopted LP) As written the NP fails the basic conditions.</p> <p><i>"Neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework). Within this broad context, the specific planning topics that a neighbourhood plan covers is for the local community to determine.</i></p> <p><i>Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan."</i></p> <p>Paragraph: 004 Reference ID: 41-004-20190509</p> <p><u>5.1. DEFINITION OF THE VILLAGE – SETTLEMENT BOUNDARY (Page 24)</u></p> <p>Third paragraph is incorrect as it refers to the Core Strategy Policy CSRI (Page 25)</p> <p>This Policy does not exist as it has been replaced by policies in the adopted SODC LP - see Appendix 14 in the adopted LP. The following policies replace Policy CSRI: -</p> <p>H4 Housing in the Larger Villages (Strategic)</p>

H5 Land to the West of Priest Close, Nettlebed (Strategic)

H6 Joyce Grove, Nettlebed (Strategic)

H7 Land to the South and West of Nettlebed Service Station (Strategic)

H8 Housing in the Smaller villages (strategic)

Page 25 – Fourth paragraph reference to a NP Policy should be clarified.

Fourth paragraph last sentence should be deleted. These policies have been superseded by the adopted SODC LP 2020

CRS2 is replaced by EMP10 Development in Rural Areas and EMP11 Tourism

CRS3 is replaced by CF1 Safeguarding Community Facilities and CF2 Provision of Community Facilities

Page 26 – third paragraph incorrect policy reference

Page 28 Policy VB 2 RESIDENTIAL DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARY

The policy needs to be prepared in line with adopted LP policies, including GB policy

Last paragraph of the policy should be deleted and replaced with:

"Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".

Page 30 the NP should be consistent with the LP i.e., to 2035

Page 31 Policy E1. Biodiversity

The policy should be prepared to be consistent with SODC LP Policy ENV3 Biodiversity. However, the need for this policy is questioned given the wording of SODC LP.

At the examination of the SODC LP, the Inspector concluded (Paragraph 48),

"Land North of Bayswater Brook will need to protect the integrity of the Sydlings Copse and College Pond SSSI (see Issue 3). But the submitted evidence does not show that the integrity of SSSIs and wildlife designations will be harmed, and there are no grounds for reducing the housing requirement because of the presence of these designations. The potential for development to remove biological material and sever biological corridors is acknowledged, but the plan contains policies to protect biodiversity and it seeks biodiversity net gain (Policies ENV2 and ENV3)."

Matters are being addressed in the preparation of the planning application.

Page 33 Policy H1. Preservation of Heritage

The need for this policy is questioned given the wording of the adopted SODC LP.

This policy is not compliant with the provisions of the NPPF which allows for a balanced decision to be made in respect of the development proposals affecting heritage assts.

Page 33 5.4. DEVELOPMENT CRITERIA

The first paragraph is incorrect, it should simply refer to the adopted SODC LP 2035

Page 33 Policy DS 1 Important Views

Policy should be worded so that it is consistent with adopted SODC LP Policy ENVI.

The last paragraph should be redrafted to *"protect and where possible enhance"*

Page 35 – 5.4.1. Parking

The first paragraph needs to be amended as it refers to SODC Core Strategy which is incorrect policy. It also refers the policy to the policy not being through examination.

The text of 5.4.1 states that:

"There is no regular public transport or cycleway in the parish, so travel by car is the only option for most households and most households need one car per adult householder."

However, the evidence base includes survey data that shows 27% of trips into Oxford are made by cycle, showing that travel by car is not the only option.

Regarding parking standards, this is covered in the SODC Local Plan Policy TRANS5 xiii) which says:

"Proposals for all types of development will, where appropriate:...

xiii) provide parking of vehicles in accordance with Oxfordshire County Council parking standards, unless specific evidence is provided to justify otherwise;"

The adopted Oxfordshire County Council Local Transport and Connectivity Plan sets out, in relation to private car parking (Page 179) that:

"As outlined in our vision, we are seeking to reduce the number of unnecessary private vehicle journeys. Parking policy changes are one way in which this can be achieved, particularly for shorter journeys which residents could walk or cycle...

We also expect district authorities to set parking standards for residential and non-residential developments that support the LTCP objectives. This includes encouraging car free developments. For instance, in Oxford, all new residential developments in a CPZ will only provide disabled parking provision."

The County Council is currently in the process of updating its parking standards in line with the objectives of its LTCP.

Given the proximity of Beckley and Stowood Parish to Oxford, it is important that the approach to transport, including parking provision for developments, is consistent with County Council policies – given also that parking provision is covered by Local Plan Policy TRANS5 and that its wording allows parking standards to reflect transport policies while allowing flexibility, Policy DS2 is in conflict and unnecessary, and hence should be deleted.

Page 36 – 5.4.3 Dwelling Size

Second paragraph incorrect policy reference.

Page 36 – Policy DS4 Dwelling Size

The purpose of this policy is questioned as it largely repeats SODC LP Policy H20

Page 39 Policy DG1. Beckley Design Guide

It is noted that the Design Guide has its origins in a consultation carried out with residents in 2017.

No reference is made to the SODC and Vale of White Horse Joint Design Guide which was adopted by SODC on 23rd June 2022 and by the Vale of White Horse on 24th June 2022. No reference is made to the National Design Guide (January 2021).

In light of the National Design Guide and the Districts Design Guide, Policy DG1 should be reconsidered.

Page 41 – 5.6. CLIMATE CHANGE POLICIES AND COMMUNITY ASPIRATIONS

In order to satisfy the basic conditions, the plan and its policies need to be in general conformity with the adopted Local Plan and consistent with government guidance.

Page 41 – Policy CC1 NEW CONSTRUCTION AND ENERGY EFFICIENCY

The government introduced major Building Regulations changes in June 2022, with new homes in England now needing to produce around 30% less carbon emissions compared to the old regulations.

Ahead of the Standard coming into effect, a technical specification will be consulted on in 2023 by the Department for Levelling Up, Housing and Communities (DLUHC), with the necessary legislation introduced in 2024, ahead of implementation in 2025.

Whilst the *"Energy Saving Trust advocated by SODC recommends a number of renewal energy projects and generating electricity at home from solar power, and the use of ground and air source heat pumps [Evidence Base 2- 2.10]"* such policy requirements should be in compliance with the Local Plan policies e.g., Policy DESIO Carbon Reduction sets energy efficiency standards for new build residential and non-residential developments.

Page 42 Community Aspirations

According to the PPG neighbourhood planning, *"Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan."*

Paragraph: 004 Reference ID: 41-004-20190509"

Page 42 5.7. COMMUNITY ASPIRATION – COMPLIANCE WITH BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN POLICIES

The final sentence of the paragraph:

"...it is proposed that the Neighbourhood Plan Steering Group should become consultees on planning applications to ensure compliance with made Neighbourhood Plan policies, as required by law."

should be amended. Once the NP is "made" it becomes part of the development plan and as such those who are determining planning applications should have regards to the policies within the plan. The Parish Council is consulted on planning applications within its area, and it can if it so chooses to consult the NP Steering Group.

Page 43 – 5.9 Redundant Farm Buildings – Wick Farm

Reference to the previous planning application is irrelevant as the application was withdrawn and so should be removed from the NP.

The second sentence states that *"The application was withdrawn and it is believed that this may have been due to the fact that it was likely to be refused"*.

This is speculation and should be removed from the NP.

13. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents. Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	Section 6. MITIGATION POLICIES FOR THE STRATEGIC DEVELOPMENT SITE "LAND NORTH OF BAYSWATER BROOK "
------------------------------	--

Page number	Page 45
-------------	---------

14. Please enter your comments below –

Section 6. MITIGATION POLICIES FOR THE STRATEGIC DEVELOPMENT SITE "LAND NORTH OF BAYSWATER BROOK "

It is considered that Section 6 and all the policies relating to LNBB should be deleted. The issues are already addressed by the adopted SODC Local Plan policies, in particular Policy STRAT 13 LNBB. Notwithstanding the above we have made the following comments below.

A Neighbourhood Plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (paragraph 13 NPPF 2021). Importantly the NP should not undermine strategic policies in the adopted local plan as the NP must be in general conformity with the strategic policies contained in the development plan.

The last sentence of the first paragraph should be deleted (Page 45).

The consideration of LNBB as an allocation in the SODC LP was discussed at length by the Planning Inspector at the examination into the Submitted Local Plan in 2020. The Inspector was appointed by the Secretary of State. Through the preparation of the Local Plan exceptional circumstances were demonstrated to justify changes to the Green Belt boundary. In order to justify exceptional circumstances, which is a very high test, it has to be demonstrated that all reasonable options for

meeting the identified need for development were examined, this was assessed through the Examination and the Inspector concluded that the site was able to be removed from the Green Belt.

Paragraph 46 of the Inspector's report (November 2020) concludes:

"Regarding Green Belt, the assessment below in Issue 2 demonstrates that there is no sound alternative means of reducing the amount of land taken from the Green Belt whilst providing for the housing requirement in sustainable locations near to where the need arises. If the housing requirement were reduced, the ability to provide homes in logical and sustainable locations would be impaired, with severely negative consequences for both the District and neighbouring Oxford, in terms of housing affordability and economic growth and longer journey patterns. At the same time, the analysis of site allocation policies in Issue 3 demonstrates that, owing to the characteristics of the chosen sites and their ability to provide green infrastructure and defensible boundaries, the impact on the Green Belt of their release would be moderate. This report concludes that there are exceptional circumstances for the removal of the land from the Green Belt. The existence of Green Belt does not lead to the conclusion that the housing requirement should be reduced."

Paragraph 174 concluded:

"Taking all the relevant factors into account, including the extent of Green Belt harm referred to above, the ability of this site to help in addressing Oxford's unmet housing needs, including affordable housing, as discussed in Issues 1 and 6, in a location close to Oxford and its employment opportunities and other facilities, amount to exceptional circumstances that justify the alteration of the Green Belt boundary."

The SODC adopted Local Plan was prepared and examined in line with national government policy at the time e.g., NPPF 2019

The NP refers to the August 2020 Planning White Paper, however this was a consultation on proposals to reform the planning system in England. As such these proposals have not been taken forward by the current government. Since then, the Levelling Up White Paper has also been produced. It remains to be seen what changes the new government under a new prime minister will make.

The second paragraph regarding the ownership and historic ownership of the LNBB is irrelevant and should be deleted from the NP.

Page 46, the first paragraph below Figure 2.1 should refer to the adopted SODC LP and Policy STRAT13.

The last sentence which refers to other neighbouring parishes should be deleted. The NP should be confined to the extent of the NP boundary agreed with SODC.

There is a sub heading Community Involvement and Engagement – but no text. It should be noted that extensive community engagement has already taken place as the planning application is being prepared.

2. The Green Belt (Page 49)

The text under the sub-heading “the Green Belt”, if referring to the purposes of the Green Belt, those relevant should be quoted. As follows from the NPPF.

- “a) to check the unrestricted sprawl of large built-up areas;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

In preserving the setting and special character of historic towns such as Oxford there is no mention of the villages.

The references to paragraphs 142 and 143 of the NPPF are misleading and should be corrected.

Paragraph 142 states that *“when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account...”*

Paragraph 143 refers to defining Green Belt boundaries. Reference should be made to SODC adopted LP Policy STRAT6

3. The Transport Infrastructure

The need for transport infrastructure associated with the development and the assessment of the transport aspects of the development are covered in the Local Plan policies and are matters for the highway authority to assess and advise on in the context of current transport policies which seek to reduce car travel, not only that associated with new development. The points made may reflect the aspirations of many parish residents, but consideration of transport aspects of the LNBB needs to

be considered strategically in the context of Oxford, and Oxfordshire County Council's transport policies.

4. Protection of the SSSI – Sydlings Copse and College Pond

See comments in relation to Section 6.4

5. Protection of The Landscape and Important Views

See comments in relation to Section 6.5.1.

The application is being prepared in accordance with the adopted Local Plan Policy STRAT13.

6. Protection of Heritage and Listed Buildings

See comments in relation to Section 6.5 and 6.6

7. Health and Air Pollution

The preparation of the planning application will address all of the above in accordance with the policies in the adopted SODC Local Plan and the appropriate assessments will be prepared in accordance with the Council's Validation Checklist.

6.1. COMMUNITY ENGAGEMENT STRATEGY (Page 47)

Community Engagement is supported, and the preparation of the planning application has had regard to the Council's approach, as referred to above extensive consultation has already taken place as part of the preparation of the planning application for LNBB.

The NP proposes a policy – but this is considered to be a community aspiration and should not be in the same colour boxes as policies.

The NPPF paragraphs 39 – 46 refers to consultation and whilst *"Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer."*

The second paragraph on page 48 refers to the establishment of a Beckley "Community Liaison Committee" to represent all the community groups and in the fourth paragraph to *"oversee the coordination of public consultation events to be held at critical stages of the development"*. The

sixth paragraph states that *"is important that before, during and after any planning application(s), during building and after completion of the development, there is formal regular contact with representatives of all the local community groups."*

The consultation programme for the LNBB application prior to submission is prepared by the consultant team. The preceding paragraphs have already outlined what has taken place to date. Pre-application discussions have also taken place with SODC and Oxfordshire County Council, Oxford City Council and statutory consultees such as the Environment Agency and Natural England, also other consultees such as Berks, Bucks, Oxon Wildlife Trust (BBOWT). Once the application is submitted SODC will consult all statutory and relevant non-statutory consultees.

6.2. THE GREEN BELT AND LOSS OF IMPORTANT LANDSCAPE AND COUNTRYSIDE (Page 49)

The first paragraph on page 49 which refers to any loss of green belt and makes reference to the Inspectors report should be deleted. The NP should refer to the adopted SODC LP. All the evidence to support the removal of LNBB from the GB was provided as the LP was prepared and discussed at the Examination. The Inspector's questions were addressed in Hearing Statements and the client provided additional evidence appended to the Hearing Statements, since then further work has been undertaken in the preparation of the planning application

Policy STRAT6

"The Green Belt boundary has been altered to accommodate strategic allocations at STRAT8, STRAT9, STRATIOi, STRATII, STRAT12, STRAT13 and STRAT14, where the development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities. Where land has been removed from the Green Belt, new development should be carefully designed to minimise visual impact."

Also see Policy STRAT 13

The NP list improvements that could be made to LNBB, however all these points are covered in policies in the adopted Local Plan. It is not a requirement to discuss any improvements with the "Community Liaison Committee".

The last sentence on page 49 should be deleted as it is a matter of fact that through the adopted LP the land has been removed from the GB.

The second paragraph on page 50 should refer to the correct paragraph of the NPPF not paragraph 130.

In respect of the boundary of the development, this is addressed in the adopted LP, See Policy STRAT13 iv) *"provides a permanent defensible Green Belt boundary around the allocation and a strong countryside edge,"*

This is addressed in the masterplan and supporting information for the planning application for LNBB.

MITIGATION POLICY GB 1. DEFINITION OF A NEW GREEN BELT BOUNDARY (Page 50)

Essentially the NP needs to be clear on its role and purpose. The NPPF is clear at paragraph 29 Neighbourhood Plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

PPG Neighbourhood Planning

"Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see.

Paragraph: 003 Reference ID: 41-003-20190509

A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework). Within this broad context, the specific planning topics that a neighbourhood plan covers is for the local community to determine.

Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan.

Paragraph: 004 Reference ID: 41-004-20190509"

NP Policy GB1 is not considered to be a policy, in terms of monitoring and viability. The issue of the boundary is already addressed in the adopted Local Plan Policy STRAT13 for LNBB (see 3 iv)

The NP policy should be deleted.

6.3. THE TRANSPORT INFRASTRUCTURE (Page 51)

This section is misleading as it refers to information that was published before the Local Plan Examination – e.g., Oxfordshire County Council evidence and does not reflect changes in transport policies and approach since that time.

<p>All the evidence to support the planning application is being prepared in the context of current transport policies and based on more detailed transport modelling carried out in consultation with the highway authority and will address many of these points.</p> <p>National Census data (2011) indicates that 31.4% of households (or 895 out of 2850 households) in Barton and Sandhills ward have no cars or vans in household, so it is misleading to say there is at least one vehicle per household in Barton. Even in Beckley and Stowood, the NP indicates that 13 out of 238 households have no cars or vans.</p> <p>This section reports on the likely traffic generation of developments allocated around Oxford to help meet Oxford's unmet needs, and also on the supposed negative impacts of Connecting Oxford. It is the function of Oxfordshire Council (as highway authority) to assess these elements. The NP makes no reference to the adopted Oxfordshire Local Transport and Connectivity Plan, which sets out a range of policies and strategies relating to transport in Oxfordshire, of which the bus gate on Marston Ferry Road, or rather the use of traffic filters to improve and encourage use of public transport, is only one. The NP fails to report County's target to reduce car movements across the County by 1 in 4 movements by 2030 and 1 in 3 movements by 2040.</p> <p>If transport related matters are to be reported in a statutory plan, it is important that it accurately reflects current transport policies as adopted by the highway authority and that the highway authority has been fully consulted on any transport related policies and text, particularly given that the transport policies and strategies are cross-authority ones, i.e., relate not only to the SODC area but Oxford City.</p> <p>Paragraph 3.114 of the Local Plan does not set out the "traffic alleviation" policies – Policies relating to the STRAT13 site are set out in Policy STRAT13 with transport covered under bullet 2v). The explanatory text at 3.114 sets out that, having first taken into account the mitigating effects of sustainable transport improvements required by the policy any significant residual impacts from the development on the surrounding highway network, including the Headington Roundabout, may give rise to a requirement for improvements to the Headington Roundabout and its approaches (including bus priority measures); or grade separation; or a new link road.</p> <p>As currently worded 6.3 of the NP does not accurately reflect the Local Plan and its policies. Indeed, it is not necessary in addition to the policies contained in the Local Plan.</p> <p><u>MITIGATION POLICY TA 1. TRANSPORT ASSESSMENT AND TRAVEL PLAN (Page 52)</u></p> <p>This is already covered by Policies TRANS4 & STRAT13 of the Local Plan and Oxfordshire LTCP Policy 36 – not required. The SEA for the NP concludes that this mitigation is not required as it is covered by Policy TRANS4 (Page 50 of the SA June 2022).</p>
--

MITIGATION POLICY TA 2. TRANSPORT ASSESSMENT AND TRAVEL PLAN – BASELINE

ASSUMPTION (Page 53)

It is role of the Highway Authority to agree the scope of the Transport Assessment in consultation with SODC – this is covered by Policy TRANS4 of the Local Plan – not required

MITIGATION POLICY TA 3. TRANSPORT ASSESSMENT AND TRAVEL PLAN – HIGHWAY AND ROAD

ASSESSMENTS (Page 53)

As Mitigation Policy TA 2 above

MITIGATION POLICY CM 1. PROVISION OF CONSTRUCTION MANAGEMENT PLANS (Page 54)

This is a normal planning requirement however the Local Plan only covers the need to provide one for major development proposals located within 20m of a water course (Policy ENV4: Watercourses). This would apply to the Strat13 site. A construction management plan is normally secured by a pre-commencement planning condition. A statement is submitted to the planning authority for approval, and must then be strictly adhered to, with any changes needing agreement from the authority. If a CMP is required, this will be discussed with the local planning authority. The Community Liaison Committee does not take on the role of the local planning authority. This policy should be deleted.

The paragraph below the policy refers to the Oxford Crematorium, which is not within Beckley and Stowood NP, (the crematorium is within Stanton St John Parish) in which case it is not relevant to this NP. The Crematorium will be a formal consultee on the planning application and will be consulted by SODC on the planning application and can submit any comments they have direct to SODC as the determining authority.

MITIGATION POLICY TA 4. COMPLIANCE WITH NICE GUIDELINES ON PHYSICAL ACTIVITY AND THE ENVIRONMENT AND HEALTH ASSESSMENT (Page 54)

This is not a specific Local Plan policy requirement, however the principles of the policy requirements of the Local Plan are compatible with the NICE guidelines. This NP policy is superfluous and should be deleted, the adopted SODC LP provides the policy framework and the SODC Validation Checklist for planning applications sets out what reports/assessments are required to support the planning application. For example, as part of the application a Health Impact Assessment (HIA) will be prepared to accord with the adopted Local Plan policy.

MITIGATION POLICY PC. 1. MAINTENANCE OF ACCESS AND SEPARATION OF FOOTPATHS AND BRIDLEWAYS (Page 54)

This is covered in policies TRANS5 1.ii) & STRAT13 3d.

The policy is not required.

MITIGATION POLICY PC 2. SITING OF PEDESTRIAN AND CYCLE BRIDGE OVER A40 NORTHERN BYPASS ROAD AND SAFETY AND CRIME REDUCTION (Page 55)

The proposed bridge will be adopted by the County Council as highway authority who will be responsible for agreeing all aspects of the bridge design meet adoptable/appropriate standards – policy not required.

MITIGATION POLICY PC 3. WIDENING OF PUBLIC RIGHTS OF WAY FOR SAFETY (Page 55)

This is covered under policy STRAT13 3 xi d) – so not required and should be deleted.

Community Aspiration C 1. Provision of Cycleways – the provision of infrastructure related to the STRAT13 site needs to be fairly and reasonably related to the development – the need for connectivity beyond the site is set out in policy STRAT13 2v) and will be a matter for the highway authority to determine in consultation with SODC.

This Community Aspiration should be deleted as all but one of these routes is outside the Neighbourhood Plan area.

The PPG on Neighbourhood Planning is clear that:

“Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan.”

Paragraph: 004 Reference ID: 41-004-20190509

MITIGATION POLICY B 1. PROVISION OF PUBLIC TRANSPORT (Page 59)

This policy should be deleted as it is covered by policy STRAT13 2v) a. The provision of public transport is covered in the adopted Local Plan policies. Each development is expected to provide high quality public transport facilities and connections within and adjacent to the site.

The application will be accompanied by a Transport Assessment and Travel Plan.

MITIGATION POLICY LR 1. COMPLIANCE WITH NICE GUIDELINES – IMPROVING AIR QUALITY (Page 60)

This policy should be deleted as Policy EPI Air Quality in the adopted SODC LP covers these points.

The planning application will be supported by an ES which will include a chapter on Air Quality.

6.4. PROTECTION OF THE SSSI – SYDLINGS COPSE AND COLLEGE POND (Page 61)

Mitigation Policy SSSI 1. REPORT AND ASSESSMENT REQUIREMENTS FOR THE SSSI SYDLINGS COPSE AND COLLEGE POND should be deleted as Policy STRAT13: Land North of Bayswater Brook and Policy ENV2: Biodiversity – Designated Sites, Priority Habitats and Species in the adopted SODC LP covers these points.

Under the heading 6.4 the fourth sentence states: *“the risk of damage to this fragile site has already been increased considerably by the development at Barton Park of 885 homes, yet to be completed”* The source of this opinion is not evidenced, as such, it should be removed.

The second paragraph includes a bullet pointed list of further assessments, surveys, and research which the documents states *‘must be agreed with Natural England and will include but not confined to’* the SODC LP does not request these. Furthermore, survey effort has been undertaken in consultation and agreement with the SODC Ecologist and Natural England.

The proposals will be accompanied by an Ecological Impact Assessment, detailing proposed impact avoidance and mitigation measures required to protect Sydlings Copse and College Pond SSSI in line with Policy STRAT 13: Land North of Bayswater Brook and Policy ENV2: Biodiversity – Designated Sites, Priority Habitats and Species.

Any mitigation required is already covered by the adopted Local Plan Policy STRAT13, it is unnecessary to include a policy in the NP.

Footpaths (Page 62)

Any discussion about footpaths (new routes etc) will be with the County Council as the responsible authority. Footpath B is not within the Neighbourhood Plan area.

MITIGATION POLICY SSSI 2. IMPLEMENTATION OF PROTECTION ZONE FROM ROADS (Page 62)

This matter is already covered in Policy STRAT13 in the adopted Local Plan, the policy should be deleted.

MITIGATION POLICY SSSI 3. AGREEMENT OF LANDSCAPE AND RECREATIONAL ENHANCEMENTS (Page 62)

This policy is covered by SODC Policy STRAT13 and therefore should be deleted.

6.5. PROTECTION OF WICK FARM AND LOWER FARM (Page 64)

This paragraph needs to be corrected as the Barn at Wick Farm is not identified by Historic England as being 'at risk' and thus reference to this should be removed from the NP. Additionally, the LNBB site (STRAT13) includes the barns used for business, and the listed Well House and barn within its boundaries and covered in Policy STRAT 13 in the adopted Local Plan and thus this needs to be corrected in the NP.

6.5.1. Landscape and Important Views

This paragraph refers to Pegasus Hearing Statements for the SODC Local Plan examination, as such all this needs to be updated. All of the viewpoints have been agreed with the Council's Landscape Officer.

The last paragraph on page 64 refers to the two masterplans produced to date do not show a landscape buffer or preserve views from Wick Farm and Lower Farm.

The latest version of LVIA (see consultation material Feb/March 2022 and also recently July 2022) shows areas of native species -rich woodland buffer planting and strengthening of the habitat along Sydclings Brook.

MITIGATION POLICY LV 1. LANDSCAPING AND MAINTAINING IMPORTANT FOR WICK FARM AND LOWER FARM (Page 67)

These points are already addressed by Policy STRAT13 in the adopted SODC Local Plan

6.5.2. Maintaining Privacy and Avoiding Overlooking (Page 67).

These points are already addressed by Policy STRAT13 in the adopted SODC Local Plan, consequently the policy Mitigation Policy LV2 should be deleted.

MITIGATION POLICY – LV 3. SPECIFIC LANDSCAPING AND MITIGATION FOR LOSS OF COUNTRYSIDE (Page 68)

Again, this policy is covered by policies in the SODC adopted Local plan and should therefore be deleted.

MITIGATION POLICY LV 4. AVOIDING HARD URBAN EDGES (Page 68)

Again, as above please see all the consultation that has taken place to date on the preparation of the planning application <https://www.bayswateroxford.co.uk/our-vision/>

This matter is covered by policies in the adopted Local Plan and therefore should be deleted.

6.6. PROTECTION OF HERITAGE AND LISTED BUILDINGS (Page 69)

Paragraph 6.6 needs to be re-written and appropriate sources referred to. The Historic Environment Records (HER) tells us that evidence of Roman activity was found on and to the east of Bayswater Road (i.e., to the east of Stowford Lodge Farm, and outside the site) in 1993.

Further archaeological work and assessment (including trial trenching) has been undertaken in association with the preparation of the planning application for the allocation. The only trial trench in the fields surrounding Stowford Lodge Farm that contained archaeology was Trench 219, closest to Bayswater Road, which contained two ditches and a stone-laid trackway with sherds of medieval pottery on the surface.

The other possible Roman road running north/south through the centre of the site was targeted by geophysical survey and trial trenching and no clear evidence of it was found.

The putative Roman villa area was targeted by geophysical survey and trial trenching. The latter recorded finds and features suggestive of occupation somewhere in the vicinity, but not within the site. The villa probably lies on the higher ground to the north, beyond the site.

Mitigation Policy HI Archaeological Site Survey should be deleted. Reference to a need for further archaeological assessment is outdated. The County Archaeologist is satisfied with the scope of the pre-determination work undertaken.

6.7. HEALTH AND AIR POLLUTION (Page 70)

MITIGATION POLICY HAP 1. AIR QUALITY ASSESSMENT AND MITIGATION (Page 71)

The first paragraph of the policy repeats the Local Plan Policy EPI and the second paragraph refers to documents.

The policy adds nothing to the consideration of the strategic site and should therefore be deleted.

MITIGATION POLICY HAP 2. INDOOR AIR QUALITY (Page 71)

The relevant parts of this policy are addressed in SODC Policy EPI i.e., “*iii) all development proposals should include measures to minimise air pollution at the design stage and incorporate best practice in the design, construction and operation of the development;*” otherwise the matters are covered by Building Regulations.

The Policy should be deleted.

--

15. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	General comments
------------------------------	------------------

Page number	
-------------	--

16. Please enter your comments below –

<p>The Neighbourhood Plan should be redrafted and confine itself to areas of the Parish beyond the strategic allocation of LNBB which is covered by policies in the adopted Local Plan. Section 6 of the NP should be deleted as it does not support the allocation of LNBB, instead it seeks to undermine the Local Plan allocation and its delivery.</p> <p>The Parish Council along with local residents have been consulted on the preparation of the planning application and will be formally consulted by SODC once the application is submitted.</p> <p>The NP should focus on non-strategic matters in accordance with the NPPF 2021 and the PPG Neighbourhood Plans. An objection is made to the NP as it fundamentally seeks to undermine the delivery of LNBB. The NP should instead focus on the village of Beckley and land that is not included in the strategic allocation at LNBB.</p>

17. Please use this form for your comments on the Neighbourhood Plan, Strategic Environmental Report and any of the other documents Please enter the Report Name, Section number, section sub-title and number to which your comment relates below -

Report Number and Title	Beckley and Stowood Neighbourhood Plan
-------------------------	--

Section number and sub-title	SEA
------------------------------	-----

Page number	34
-------------	----

18. Please enter your comments below –

The SEA prepared by Levett-Therivel (June 2022) page 34 states that SODC commented on the Draft NP policies in May 2021, however, no copy of the Council's comments appears in the NP Consultation report dated June 2022 or appended to the SEA (apart from those of 2018 and the Screening Statement of 19th May 2021).

The comments from SODC which are appended to the NP Consultation Report (June 2022) are dated February 2018 and clearly relate to the previous version of the Reg 14 NP. In their response of February 2018, the SODC stated that at this stage their comments *"are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions."* (my emphasis)

It is noted that the contents page of the Consultation Report refers to Appendix 2.2 the SODC response of February 2018. Supplementary text in italics then states that:

"More recently a Strategic Environmental Assessment has been completed at their insistence. Policies have been discussed with SODC and amended accordingly. Since their comments the SODC Local Plan has been adopted."

However, apart from the Screening Statement of 19th May 2021 from SODC which states that a SEA is required, there is no written evidence of any further comments from the Council which it is assumed were provided prior to the Local Plan being adopted but after the first comments in February 2018.

PPG Neighbourhood Planning states: *"A neighbourhood plan may require a strategic environmental assessment if the draft neighbourhood plan falls within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004. This may be the case if it is likely to have a significant effect on the environment. This may be the case, for example, where a neighbourhood plan allocates sites for development."*

The NP sought the advice of the LPA *"on whether the Environmental Assessment of Plans and Programmes Regulations 2004 are likely to apply. Neighbourhood plans may also require assessment in relation to the Habitats Regulations 2017. A neighbourhood plan proposal must provide sufficient information to enable a competent authority to undertake an appropriate assessment or to screen it to determine whether an appropriate assessment is necessary. If an appropriate assessment is required then this will engage the need for a strategic environmental assessment."*

Paragraph: 073 Reference ID: 41-073-20190509

The Parish Council requested a Screening Opinion from SODC, which was provided in May 2021.

Although the NP does not allocate any sites for development it "contains proposals seeking to affect the strategic site 'Land North of Bayswater Brook' which partially falls within the parish of Beckley and Stowood. Mitigating the strategic development at Land North of Bayswater Brook is identified in the neighbourhood plan as being particularly important to the local community."

Paragraph 15 of the SODC Screening Statement: "As regards the proposed mitigation policies, the strategic framework for the allocated strategic development at Land North of Bayswater Brook is set by Policy STRAT13 of the South Oxfordshire Local Plan 2035. The proposed mitigation policies in the draft NDP seek to provide further detail and set additional requirements. In particular, the draft NDP includes a number of policies which seek to mitigate the impact of the strategic development on the local SSSI. The policies include the provision of land for footpath changes which seek to reduce visitor numbers and access from Barton Park and the strategic site allocation to the SSSI. There is also a policy which seeks to distance roads away from the SSSI. Given the scale of the development that is affected by these policies, the effects on the environment whilst could potentially be positive are likely to be significant."

The draft NDP also contains a policy on building heights (Policy DGI Beckley Design Guide and Mitigation Policy LV2 Maintaining Privacy and Avoiding Overlooking -Building Heights) which states that buildings should not extend above three stories. A restriction on the height, which is not a requirement in the strategic policy, could result in the developable area being expanded. SODC concluded that "...without a full SEA, it would not be possible to rule out that this would likely to have a significant environmental effect."

It is noted that Natural England were consulted and advised that there may be significant environmental effects from the proposed plan.

SODC have concluded that an SEA is required even though the NP does not allocate LNBB and the LP in allocating the site would have been supported by an SA.

It is noted in the SEA at page 34 states that the main points of concern from SODC in the Screening Statement of May 2021 were those on:

- Ring Road and rat runs (formerly policies LR 3 and LR 4)
- Protection of the Sydlings Copse SSSI (formerly policy SSSI 2)
- Protection zone from roads (formerly policy SSSI 3)
- Building heights (policy LV 1)"

It is noted that SODC concluded in May 2021 that an SEA was required for the NP as the NP is likely to have a significant effect on the environment. These comments by SODC were made in full knowledge of the adopted SODC LP and the policies included therein that relate to Land North of Bayswater Brook.

Consequently, the SEA was prepared – this should be a process of identifying and assessing the environmental impacts of a plan and its alternatives and minimising any negative impacts of the plan. The NP has 12 policies that relate to the parish, but 23 policies that relate to the strategic allocation of LNBB which is only partly within the parish.

It is considered that the process of preparing the SEA is not transparent.

Paragraph 1.4 of the SEA refers to a draft Scoping report which was sent to the Environment Agency, Historic England, Natural England and SODC on 29th March 2022 and replies from these organisations dated 4th May 9th April and 29th April – none of this correspondence is appended to the SEA, neither is any response from SODC. SODC comments are reported in four bullet points on page 9 of the SEA.

Section 7 of the SEA is supposed to examine the reasonable alternatives, again this is not transparent.

Alternatives considered relate to the settlement boundary and a new alternative suggested by the SEA scoping progress on Wick Farm and on biodiversity enhancements – apparently these were discussed at two meetings with the Neighbourhood Plan team and the SEA consultant on 28 March and 19th April 2022 as well as various emails and phone calls – no records are appended to the SEA.

The changes made to the draft NP as a result of the discussions are summaries in Section 7.7

It is evident that the NP has been in preparation for over six years and originally contained 12 policies applicable to the parish as a whole – the key issue being a policy on the settlement boundary for the parish.

It is clear that the mitigation policies for LNBB, of which there were initially 29 were included in response to the SODC LP being adopted and including the allocation in Policy STRAT13 for LNBB. Settlement boundary/village boundary – the preferred approach and thus the proposal for “tight

settlement boundary" does not meet the basic conditions as it is in conflict with the basic conditions.

- Link road and rat runs – after much discussion the draft policies regarding a Link Road have been mostly deleted from the plan, but it is apparent that the *"issue remains a significant concern for current and future residents."*
- Footpath changes – *"the NP team have decided to have a community aspiration for the footpath to be rerouted as part of any development at Land North of Bayswater Brook to reduce the number of new visitors at the SSSI"*
- Protection Zone from roads – this is already covered in SODC Policy STRAT13 and been addressed in the masterplan – so it is not clear what the purpose a policy in the NP would be. It appears that the NP team want to safeguard from any future plans.
- Building Heights– the implications of preventing development over 3 storeys (i.e., more land would be needed for the same number of dwellings has not been assessed, if this is the Parish Council's preferred approach as set out in the NP policies where is the additional land to accommodate development needs?

It is noted that Section 8 appraises the policies in the plan, the fundamental issue is the 23 mitigation policies for LNBB must be questioned. The policy framework for LNBB is already provided by the SODC LP, all government policy and guidance are clear that neighbourhood plans should support the delivery of strategic policies contained in local plans and spatial development strategies. Qualifying bodies i.e., in this case the Parish Council should plan positively to support local development, shaping and directing development in their area that is outside these strategic policies. More specifically paragraph 29 of the National Planning Policy Framework states that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

The NP does not meet the basic conditions, it does not have sufficient regard to national or local policy. The NP is not considered to be in general conformity, as currently drafted with 23 policies supposedly included to mitigate the development of the allocated site a LNBB are not justified. It is obvious from the start of the documentation that the authors of the NP object to the allocation of LNBB, and instead of supporting the allocation, the NP includes an unnecessary amount of detail which seeks to undermine the delivery of the LNBB. Many of the points raised are in principle already covered by the policies in the adopted Local Plan and the validation requirements for the preparation of a planning application.

An objection is made to the NP as it fundamentally seeks to undermine the delivery of LNBB. The NP should instead focus on the village of Beckley and land that is not included in the strategic allocation at LNBB.

APPENDIX 10. INDIVIDUAL RESPONSES

10.1. BECKLEY RESIDENT

Please enter your comments below -

I'd like to propose some more specific mentions of the views of, and from, the church and churchyard. Although the church is mentioned in passing, there's no mention of its visually imposing position high above the southern end of Church St, nor of the views from the churchyard. The views along the path from the lych gate to the porch are particularly dramatic. From the area immediately in front of the church porch (and the track leading to Grove Farm), the views stretch to both the north-west and north-east over Otmoor, a partial vista over fifteen miles wide, helping to establish the church within its historic and ecological setting as one of the 'Seven Towns.' These views of Otmoor are mostly over private gardens and roofs on Church Street and the school grounds, and thus particularly vulnerable to being impacted by future development, unsympathetic tree planting or simply unchecked tree growth. It would be wonderful to see them singled out for mention, perhaps along with the current glimpses of the church tower afforded from the approach roads to Beckley. I'd also like to see the 'dark skies' policy 5.5.1 tweaked to recognise the importance of making an exception for sensitive floodlighting of the church, which serves to highlight its importance both as a beautiful heritage asset and the enduring centre of our community. (The current lighting schedule, which differs from nearby villages such as Islip in this regard, aims to strike a balance between 'dark skies' nights and 'floodlit' nights.)

APPENDIX 10.2. WICK FARM RESIDENT

Please enter your comments below -

There are several reasons that this development should be moved further away from Wick Farm, particularly the proposed housing directly behind the bridle path at the back of the site towards Beckley. The proposed site is an old landfill site, which has already been rejected as a proposed site for the A40 to be sited many years ago due to the type of landfill. It is also going to completely overshadow the Wick Farm residents that are there & they will lose all privacy as they will be completely overlooked, especially if 2/3 storey buildings are erected & the site is dug out up the hill in stages. Putting trees up will just cause dampness to the mobile homes damaging them as they will block all light to the gardens. Surely it would be better to site them at the top of the hill as originally proposed?? I expect that wasn't changed to Brown belt without telling the residents?? The light & noise pollution will also impact not only on the resident but on the bat population housed in the Wick Farm buildings. The existing extra housing that has been built has already impacted on the number of break-in's & muggings on Wick Farm & the surrounding housing, so building more will increase this again as you are proposing different types of housing. Traffic on the roads will be increased significantly as not all residents work locally as we are on the commuter belt for London & other areas so residents will have to drive, even if it is to the park & ride. There is also the issue of flooding as our garden at the back of Wick Farm by the bridle path constantly floods, even in dry Summer conditions.

APPENDIX 10.3. LOCAL MINISTRY, THE CHURCH OF ENGLAND PARISH OF BECKLEY

Please enter your comments below -

The neighbourhood plan needs to include the church not just as a grade I listed building but more importantly as a community of Christians. Keeping the pub is understandably and rightly identified as one of the two most important issues for the Neighbourhood plan: the pub provides a focus for many of the important formal and informal community activities; the pub provides social cohesion and embraces diversity. The same can and should be said of the church. The numbers attending normal Sunday service in the church fluctuate widely from generation to generation, but the numbers attending events like 'Carols and Claret' and the recent presentation by The Arts Society Oxford of their detailed examination of the contents and artefacts of our church show that the church also provides a focus for community activities. Many turn to the church at time of birth, marriage or death and it provides social cohesion and embraces diversity. This needs to be included in the neighbourhood plan

APPENDIX 10.4. JPPC RE SANDY ACRE



JPPC ref: DB/7493

The Beckley and Stowood Neighbourhood Plan

Sent by e-mail
camps.walsh@btinternet.com

14th September 2022

Dear Mrs Camps Walsh

Beckley and Stowood Neighbourhood Plan

We write in response to your current consultation on the current Beckley and Stowood Neighbourhood Plan on behalf of our clients Mr and Mrs Smith who are residents of Beckley and owners of the property Sandy Acre on Woodperry Road. We congratulate the Working Group on reaching this consultation stage.

This response focuses on our clients' property Sandy Acre, in particular the proposed settlement boundary which excludes it from the village. Where relevant we also make comments on other procedural matters which we hope you will find helpful and would be pleased to elaborate upon.

The Neighbourhood Plan explains the rationale for defining a settlement boundary as follows: *"In order to properly define the area within which development and redevelopment will be supported in principle, it is proposed to define a settlement boundary for the purposes of Core Strategy policy CSR1 and paragraph 149 of the NPPF"* (p24).

It proceeds: *"Policy VB1 is intended to distinguish between the built-up area of the main village and the wider surrounding areas in order to manage development proposals accordingly. In defining the boundary on the Policy Map, applicants and the local planning authority will have certainty when preparing and determining planning applications respectively."* (p.25).

On a procedural point the Neighbourhood Plan will need to be reviewed and updated before any examination to reflect the policies the current South Oxfordshire Local Plan 2035 (adopted 10/12/2020) if it is to satisfy the basic condition of general conformity with strategic policies of the development plan.

Secondly, we believe clarification is needed as to the purpose of the settlement boundary. Our understanding is that it is to indicate the area in which new dwellings, which are supported in principle within the village under the Development Plan, will be supported.

The John Phillips Planning Consultancy
Partners:
Neil Warner MRTPI Ltd
Henry Vennart Ltd



Bagley Court
Hinkley Hill
Oxford, OX1 1JH
T: 01865 329023
E: planning@jppc.co.uk
W: www.jppc.co.uk

The case *Jullan Wood v SoS and Gravesham Borough Council [2015]* sets out that the term "in villages" for the purposes of Green Belt policy under the NPPF (para.149) is not necessarily the same as a settlement boundary. The court found that a village boundary as designated in the development plan was not determinative on the question of whether a development was "infilling in a village" as allowed by the NPPF. Instead, there is a need to consider the facts on the ground at each application. Noting this judgement it would not seem correct for a boundary defined in the Neighbourhood Plan to determine whether a development was or was not inappropriate in the Green Belt.

Notwithstanding these procedural points we are concerned at the omission of Sandy Acre from the main body of the village by the proposed settlement boundary. Having regard to its character and appearance, and the evidence cited in the Neighbourhood Plan we see no logical reason it is not included within the village envelope. We believe the boundary should be amended to include Sandy Acre within the built-up part of the settlement if the Plan is to proceed through examination.

Sandy Acre is a longstanding residential property having been first developed in the 1960s. The land use and appearance of the site mean it is clearly developed land and reads as part of the main body of the village, rather than the undeveloped agricultural fields to the east. The position of the property immediately abutting the historic village centre also means it has a far closer relationship both in terms of distance and visual connection than properties on the southern side of Woodperry Road which are accepted as lying within the settlement boundary.

Recently planning permission has been granted for the construction of two new dwellings at Sandy Acre (P20/S4112/FUL) which are under construction. Planning permission P22/S2193/FUL is currently under consideration and recommended for approval by the Planning Officer. If approved this would result in three dwellings on the site which abut the historic village centre. These developments have been supported by South Oxfordshire District Council and its Planning Officers as, having regard to material considerations, they consider Sandy Acre to be within the built limits of the village.

The Neighbourhood Plan confirms that dwellings to the southern side of Woodperry Road are included in the proposed settlement boundary as in determining planning applications Planning Inspectors and South Oxfordshire District Council have concluded these properties to be within the built limits of the village. It is of course correct that the Neighbourhood Plan has regard to previous planning decisions and precedents. Consequently due regard must be paid to the conclusion in recent applications at Sandy Acre that the site is within the village and include it in the settlement boundary.

The Neighbourhood Plan also refers to a letter from the Development Manager at South Oxfordshire District Council (Appendix 17) regarding consideration of planning application in Beckley as a factor in defining the settlement boundary. The letter notes: "We [SODC] have held a longstanding view that Woodperry Road is within the settlement as it is connected to the main body of the village by a continuous built up frontage." Sandy Acre is directly connected to the residential properties which form the main body of the village; thus by the same reasoning it forms part of the village. It should be included within the settlement boundary.

The Development Manager's letter also explains that homes north of Woodperry Road which are "separated from the main body of the village by a number of significant gaps" have not historically been considered to be within the built limits of the village by the District Council. The logical interpretation of this stance is that Sandy Acre, which is not separated from the main body of the village by any gap, is within the built limits of the village. This is the approach adopted by Planning Officers in recent applications at Sandy Acre and demonstrates the land should be included inside the settlement boundary.

Our clients agree the agricultural fields east of Sandy Acre should be excluded from the settlement boundary for the reasons cited in the Plan. They are undeveloped and so distinctly different to the character of the built settlement. The undeveloped land contributes to the openness of the area while also allowing views to the north. However, these fields are fundamentally different to the developed site of Sandy Acre.

We believe the proposed boundary which does not distinguish between the developed Sandy Acre and adjoining agricultural land diminishes protection for these fields. As proposed, the boundary offers little distinction in character between the developed village and outlying countryside. It would be far more logical, and so defensible in future planning decisions, if Sandy Acre were included in the village boundary providing a clear contrast between the developed village and open countryside beyond.

In summary, having regard to available evidence, the character of the site, and considerations noted as relevant in the Neighbourhood Plan commentary there seems no reasonable basis upon which Sandy Acre should be outside the settlement boundary. Furthermore, the categorisation of the developed site as countryside, rather than as part of the developed settlement, is considered to diminish protection of greenfield land around the village.

We do not consider the proposed settlement boundary would contribute to the achievement of sustainable development or be in conformity with the development plan; consequently, as drafted, the Neighbourhood Plan would not meet the basic conditions at examination. We believe the boundary should be amended to include the property if the Plan is to proceed through examination and referendum.

We trust these comments are of assistance to you and would be pleased to discuss further. Our clients are keen to contribute to the Neighbourhood Plan and so wish to be notified of any further consultation or discussion.

Yours faithfully,