

Towersey Neighbourhood Plan - publicity period

Response 1

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Individual

Your comments

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

Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Towersey Neighbourhood Plan:
Don't know

Your details and future contact preferences

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

Title	Mr
Name	David Simmonds
Job title (if relevant)	-
Organisation (if relevant)	-
Organisation representing (if relevant)	-
Address line 1	██████████
Address line 2	██████████
Address line 3	-
Postal town	██████
Postcode	██████████
Telephone number	-
Email address	██

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

██

Q9. How did you find out about the Towersey Neighbourhood Plan consultation?

██████████

Response 2

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q1. Are you completing this form as an:
Individual

Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Towersey Neighbourhood Plan:
No, I do not request a public examination

Your details and future contact preferences

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Title	Mr
Name	Martyn
Job title (if relevant)	Phillips
Organisation (if relevant)	-
Organisation representing (if relevant)	-
Address line 1	[REDACTED]
Address line 2	-
Address line 3	-

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Postal town

████████

Postcode

████████

Telephone number

██████████

Email address

████████████████████

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██████████

Response 3

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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<p>South Oxfordshire District Council has worked to support Towersey Parish Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan.</p> <p>In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Towersey Neighbourhood Development Plan (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.</p> <p>We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that require further consideration. To communicate these in a simple and positive manner, we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.</p> <p>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.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2023-06-26 Towersey Reg 16 DC Comments.pdf - [REDACTED]

Your details and future contact preferences

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

████████████████████

Policy and Programmes

HEAD OF SERVICE: [REDACTED]



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

26 June 2023

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

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

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

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

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

Yours faithfully

[REDACTED]
Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1.	3.3.8 – Page 15	Our development management team recommend that the reference to the badger sett is removed, as these should be kept confidential to protect the badgers.
2.	4.2 - Planning Policy Context, Vision and Objectives. – Page 39	<p>Section starting National Planning Policy – we recommend that all references to the NPPF here and throughout the plan are dated 2021 to ensure the most up-to-date version of the document is referenced.</p> <p>Several of the paragraphs of the NPPF referenced here are incorrect - we recommend that this section is amended as follows:</p> <ul style="list-style-type: none"> • <i>Non-strategic policies and neighbourhood planning (Paras 28 - 30)</i> • <i>Promoting healthy and safe communities (Paras 92 - 103)</i> • <i>Achieving well-designed places (Paras 126 - 136)</i> • <i>Conserving and enhancing the natural environment (Paras 174 - 188)</i> • <i>Conserving and enhancing the historic environment (Paras 189 - 208)</i> <p>Section starting Strategic Planning Policy – we recommend the reference to the Core Strategy is removed and replaced with reference to the South Oxfordshire Local Plan 2035, as this supersedes the Core Strategy.</p> <p>Paragraph 4.2.4 refers to the Local Plan Inspector issuing his report ‘as of early December 2020’. We recommend removing this paragraph, as the Local Plan was adopted in December 2020.</p>
3.	Paragraph 4.2.5 – Page 40	<p>We recommend that the wording in the first sentence of this paragraph is enhanced to ensure the current status of the Thame Neighbourhood Plan is clear:</p> <p><i>‘Neighbourhood planning is popular in South Oxfordshire and several plans have been made, or are in preparation, in the vicinity of the Parish. This includes the Thame Neighbourhood Plan, which was made in 2013 and is now being reviewed.’</i></p> <p>The Sydenham and Chinnor Neighbourhood Plans have now both been made, as of May 2021. We recommend reference to these plans is updated to provide up to date information.</p>
4.	Policy 5.1 TOW1 Village boundaries and infill development – Page 44	To enhance the clarity of this policy, we recommend making specific reference to where the policy map can be found within the plan (<i>‘page</i>

Ref.	Section/Policy	Comment/Recommendation
		<p>63-64'). Additionally, where the policy map is referenced in other policies, we recommend including a page number highlighting where the policy map can be found.</p> <p>Rewording of paragraph B is recommended, to improve its clarity: <i>'Proposals for infill development, as defined by the housing and infill policies of the Development Plan, within the Village Boundary identified on the policies map will be supported, provided they accord...'</i></p> <p>Rewording of paragraph C is also recommended to ensure clarity, by referring to the NPPF's definition of appropriate rural development: <i>'Proposals for development outside of the Village Boundary will only be supported where they are considered appropriate rural development as defined by the NPPF, and they are consistent with local Development Plan policies and the Towersey Neighbourhood Plan.'</i></p>
5.	Policy 5.2 TOW2 Housing Mix – Page 46	We recommend that both instances of the word 'infill' are removed from this policy so that the wording applies for any development which is brought forward in the parish.
6.	Policy 5.3 TOW3 Climate change mitigation – zero carbon buildings – Page 48	<p>The council fully supports the objectives of promoting zero carbon through neighbourhood plans - the climate and ecological crises are the greatest challenges facing our society.</p> <p>This policy requires Passivhaus technology and though proposed in the context of where such an approach is 'feasible,' the policy does not offer any definitive guidance on how feasibility would be assessed – leading to detailed technical debates between the council and the developer concerned. This does not align with national policy and guidance requiring that plans should be clear and unambiguous and drafted with sufficient clarity that a decision maker can apply them consistently and with confidence.</p> <p>The National Planning Policy Framework expects local planning authorities, when setting any local requirement for a building's sustainability, to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be</p>

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		<p>based on robust and credible evidence and pay careful attention to viability. The proposals in the Neighbourhood Plan are not supported by direct evidence or assurance about the effect of the policy on new development in the parish in general, and therefore we are of the view that the policy is not supported by the appropriate evidence required by national guidance.</p> <p>This policy also contains very similar wording to that included in the submission version of the Culham Neighbourhood Plan. Culham's examiner recommended a number of changes to be made to their policy in order to ensure it met the basic conditions. Due to the strong similarities in terms of policy wording and how, as described above, the council is of the opinion that the policy does not meet the basic conditions, we recommend the following modified wording:</p> <p><i>'Development proposals which would be 'zero carbon ready' by design by minimising the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping will be supported.</i></p> <p><i>Proposals for a Passivhaus or equivalent standard buildings with a space heating demand of less than 15KWh/m2/year will be supported. Schemes that maximise their potential to meet this standard by proposing the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located will be supported, provided it can be demonstrated that the scheme will not have an unacceptable effect on the character area.</i></p> <p><i>Proposals for major development should be accompanied by a Whole-Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions have been taken to reduce embodied carbon resulting from the construction and use of the building over its life.'</i></p> <p>We recommend these modifications to ensure the plan has regard to national policy and guidance and to ensure it is in general conformity with strategic policies in the Development Plan.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>To also ensure the clarity required by national policy and guidance, the council recommends that the supporting text in paragraphs 5.3.1 to 5.39 is amended to reflect the recommended alterations made to the policy, to meet the basic conditions; and to expand upon the Policy's relationship with Local Plan policies and its local approach. As set out in national guidance, this will also reflect and respond to the unique characteristics and planning context of the specific neighbourhood area. We recommend the following replacement text:</p> <p><i>'Policies DES8-10 of the adopted Local Plan provide local guidance on this important matter. Its paragraph 8.30 provides the context for the approach taken and comments that the Government has established that through Part L of the Building Regulations, emissions allowed from new buildings will be reduced incrementally and that "zero carbon" buildings will be required within the plan period. The Housing and Planning Act 2016 stipulated that a review of minimum energy performance requirements under Building Regulations must be carried out and it is expected that current standards will be improved with the introduction of the Future Homes Standard. Policy DES10 sets the Council's policy requirement for carbon reduction.</i></p> <p><i>Policy DES8 of the Local Plan comments that all new development, including building conversions, refurbishments, and extensions, should seek to minimise the carbon and energy impacts of their design and construction. Proposals must demonstrate that they are seeking to limit greenhouse emissions through location, building orientation, design, landscape, and planting considering any nationally adopted standards and in accordance with Policies DES10 and DES7.</i></p> <p><i>Policy DES10 of the Local Plan provides more specific details and comments that a range of development proposals (including those for residential uses) should achieve at least a 40% reduction in carbon emissions compared with a code 2013 Building Regulations compliant base case. This reduction is to be secured through renewable energy and other low carbon technologies and/ or energy efficiency measures. The policy comments that this requirement will</i></p>

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		<p><i>increase from 31 March 2026 to at least a 50% reduction in carbon emissions and again from 31 March 2030 to a 100% reduction in carbon emissions (zero carbon). The policy also comments that these targets will be reviewed in the light of any future legislation and national guidance.</i></p> <p><i>The implementation of Policy DES10 is expanded in the Joint Design Guide (June 2022). This Design Guide has been prepared as part of South Oxfordshire and Vale of White Horse District Councils' commitment to securing the highest quality development within the districts. The guide builds upon and replaces previous local design guides and aligns with the National Design Guide (2019). It is intended to assist landowners, developers, applicants, agents, designers, and planners in the process of developing high quality development and in assessing its design quality. The guide is a Supplementary Planning Document (SPD). The section on Climate and sustainability sets out a series of design standards to achieve the details of Policy DES10.</i></p> <p><i>In November 2022 the District Council published a technical advice note on Policy DES10 of the Local Plan. The note comments that whilst it is not an adopted policy document, and should not be read as such, it sets out how applicants should demonstrate compliance with the adopted policy. It also comments that it will be of use to South Oxfordshire District Council officers, developers, and applicants, elected Members, as well as any other interested parties.</i></p> <p><i>Policy TOW3 of this Plan builds on this comprehensive local approach. It will result in a situation where the neighbourhood plan would offer a supportive context for development proposals in the parish to achieve more sustainable solutions that those required by the Local Plan policy. Plainly the wider situation may be affected by changes to national or local planning policies on these matters in the Plan period.'</i></p>
7.	Policy 5.4 TOW4 Design – Page 53	Our Urban Design team recommend rewording this policy for clarity and consistency with other development plan documents as follows:

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		<p>Proposals for development Development proposals will be supported, provided they sustain and enhance the distinctiveness character of the Parish and, where appropriate, the character and appearance of the Towersey Conservation Area and it's setting as shown on the Policies Map.</p> <p>As appropriate to their scale, nature and location, development proposals should also have full regard to the Towersey Character Appraisal and the following design principles, the importance of which define the essential character of the village:</p> <ul style="list-style-type: none"> • The presence Maintains the prevailing character of one to two-storey, semi-and detached detached and semi-detached dwellings with constant consistent building lines in rectangular plots fronting onto a main roads; • The common use of red brick and plain tile roofs or Welsh slate on lower pitch, smaller scale domestic buildings; Respond to and compliments the prevailing material character which primarily consists of: red-facing brick, colour through render, some buff brick and stone, plain clay tile roofs with some Welsh slate, and a small number of thatched roofs. • The prominence Appearance in the street scene of a number of several Local Heritage Assets, notably The Old Bakery, Manor Cottage/Cobblers Cottage, 1 Church Lane, 11 Church Lane, Greenway, which either terminate or punctuate key views along the main roads; • The importance Maintain the setting of informal and formal open space as intimate and tranquil areas in the village, providing glimpsed views to a number of several listed buildings and local heritage assets whilst their openness contributes to the setting of these heritage assets, especially: <ul style="list-style-type: none"> ○ the Three Horseshoes PH garden; ○ land at The Duck Pond; ○ the Village Green; ○ White's Field; • The importance of the setting and openness of land adjacent to Towersey Manor in its contribution to the setting of Towersey Manor and to the buildings at Upper Green Farm and at Home Farm;

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		<ul style="list-style-type: none"> • <i>The importance prominence of mature trees and tall hedges along frontage boundaries and the common use of grass verges, occasionally with ditches, in the space in front of buildings, in defining the rural character of the area and helping to punctuate views in the street scene;</i> • <i>The pattern of strongly defined edges to the countryside with clear rear plot definition by way of boundary walls, hedges, fences and/or trees;</i> • <i>Views into the village, including the Conservation Area, at public vantage points to the west, north-west and east and from the former railway embankment in the south;</i> • <i>The importance of plot arrangements in the setting of the Conservation Area, as shown on the Policies Map, and local heritage assets, as set out in Policy TOW5, in defining the essential character of the Conservation Area.'</i> <p>Additionally, the reference to '1 Church Lane' is likely to be incorrect as this is a one-storey bungalow of no significance. We recommend this is replaced with '3 Church Lane'.</p>
8.	Para 5.4.1 – Page 54	This paragraph makes several references to the 'emerging' Local Plan. We recommend the word 'emerging' is removed as the Local Plan 2035 was adopted in December 2020.
9.	Policy TOW7 Green infrastructure and biodiversity – Page 57	Paragraph A of this policy reads as descriptive supporting text. We therefore recommend it is relocated outside of the policy box. Additionally, the wording in this section does not make it clear if the network is considered to be all trees, hedgerows, etc, or just select ones. It is also not clear what constitutes 'land of biodiversity value'. These issues could be remedied through the inclusion of a detailed map indicating the specific location of the network, which is not currently included within the plan. We consider this to be essential for the understanding of the policy, as it is currently not clear what specific sites would constitute being part of the network and therefore where the requirements stipulated in the policy would apply. The district council would be happy to work with the parish council to produce a map of this network if this is deemed to be required.

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		<p>We recommend that the word '<i>unacceptable</i>' should be inserted before 'loss of land...' in the final paragraph, as the current wording could be perceived to be overly onerous.</p> <p>Comments from Forestry (<i>the following representation was received after the deadline</i>): In relation to policy TOW7, surveys would be required to justify including features that benefit from protection under the policy. Such information would be required before we could provide further comments on this. Alternatively, from an arboricultural perspective, it would be preferred to include a section relating to the protection of trees, woodlands and hedgerows, similar to section 2 of policy ENV1 of the SODC Local Plan.</p>
10.	Policy TOW9 Managing Traffic – Page 58	<p>We recommend the removal of the first paragraph in this policy, as many traffic matters fall outside the scope of planning, including changes to traffic management on existing transport networks.</p>
11.	Policy TOW11 Local Gap – Page 62	<p>The final paragraph of this policy lacks the clarity required by national policy and guidance. We therefore recommend replacing it with the following wording: '<i>Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character and if they are consistent with local Development Plan policies and the Towersey Neighbourhood Plan.</i>'</p>
12.	Character Analysis – Page 76	<p>Comments from Conservation (<i>the following representation was received after the deadline</i>): In general, Section 3 'Character Analysis' is welcomed and provides useful context; the desire to retain the existing character of the area is acknowledged. However, the level of detail on setting of the conservation area is very detailed in paragraphs 3.24 and 3.25. Setting is ambiguous and defining the setting too prescriptively could result in areas that are not explicitly included in the setting being considered outside the setting and open to unsympathetic development. However, the role played by setting would depend on the merits of each proposal, such as scale, design etc and is better defined in more general terms. It is recommended therefore, that paragraph 3.25 is omitted from the proposal.</p>
13.	Appendix 2 Non Designated 'Local' Heritage Assets – Page 94	<p>Comments from Conservation (<i>the following representation was received after the deadline</i>): The inclusion of a local is supported by officers in principle, especially as there is no extant</p>

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		<p>Conservation Area Appraisal and since Manor Farm and Deans Farm on west of Chinnor Road sit just outside the conservation area boundary. The list provides pictures, information on design and heritage significance for each of the listed assets and so is supported by officers. However, it should be noted that while the Three Horseshoes Public House is not nationally listed, the adjacent barn is Grade II nationally listed and so would not require additional local listing. The list of nationally listed buildings and also Plan F on p 86 showing heritage assets should be updated to reflect this. The listing was undertaken first in 2021 and contains a recent detailed description of significance. The link to Historic England listing entry is provided below: Barn and outbuilding at the Three Horseshoes Public House https://historicengland.org.uk/listing/thelist/list-entry/1473880?section=official-list-entry</p>

Typographical/Presentational Amendments		
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13.	General comment on pictures, tables, and maps	We recommend that each photograph, table, map, or other tool used to display information relevant to the plan is given its own unique reference name and/or number. Reference to this name and/or number should also be made in the supporting text or policy where relevant.
14.	2.2.4 – Pre-submission Plan – Page 8	We recommend this section is reworded to be past tense now that the pre-submission phase of the plan has concluded.
15.	3.8.9 – Page 29	This paragraph refers to the status of several approved/under construction developments as of September 2022. We recommend updating this section to ensure it is accurate as of the time of submission.
16.	3.11.1 – Page 32	Aylesbury is listed twice in the first sentence. We recommend removing one of these references for clarity.
17.	Para 5.6.1 – Page 56	We recommend that references to the NPPF are updated as followed: <i>'The policy designates a series of Local Green Spaces in accordance with the NPPF and as shown on the Policies Maps (pages 63-64).'</i>

Response 4

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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Your comments

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<p>Dear [REDACTED],</p> <p>I am writing in relation to the following:</p> <p>NDP: Neighbourhood Development Plan Towersey Parish [Case Ref. PL00777182; HE File Ref. CHA; Your Reference.]</p> <p>Please find attached for you attention.</p> <p>Yours Sincerely</p> <p>[REDACTED] on behalf of [REDACTED] Business Officer E-mail: [REDACTED]@historicengland.org.uk Direct Dial: 020 7973 3376</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: historic england 19-5.pdf - [REDACTED]

Your details and future contact preferences

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Title	-
Name	██████████
Job title (if relevant)	Historic Places Adviser
Organisation (if relevant)	Historic England
Organisation representing (if relevant)	-
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Address line 2	Cannon Bridge House
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Postal town	London EC4
Postcode	EC4 2YA
Telephone number	020 7973 3376
Email address	██████████@historicengland.org.uk



Historic E

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

Direct Dial: -

Our ref: ██████████
19 May 2023

Dear ██████████

Thank you for your letter regarding the Towersey Neighbourhood Plan.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the plan.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this plan again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Yours sincerely,

██████████
Historic Places Adviser - London and South East
██████████@historicengland.org.uk



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

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Response 5

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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<p>Thank you for your notification of 10 May 2023 regarding the Towersey Neighbourhood Plan.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As South Oxfordshire District Council lies outside the coalfield, the Planning team at the Coal Authority has no specific comments to make.</p> <p>Kind regards</p> <p>The Coal Authority Planning Team</p>

Your details and future contact preferences

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

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

Job title (if relevant)	-
Organisation (if relevant)	The Coal Authority
Organisation representing (if relevant)	-
Address line 1	-
Address line 2	-
Address line 3	-
Postal town	-
Postcode	-
Telephone number	-
Email address	TheCoalAuthority-Planning@coal.gov.uk

Response 6

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Towersey Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Dear Sir/Madam</p> <p>Please find attached our response to the above consultation.</p> <p>Regards</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Property Town Planner</p> <p>[REDACTED]</p> <p>[REDACTED]@thameswater.co.uk</p> <p>1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 23.06.23 Towersey NP issued.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	Property Town Planner
Organisation (if relevant)	Thames Water
Organisation representing (if relevant)	-
Address line 1	1st floor west
Address line 2	Clearwater court
Address line 3	Vastern Road
Postal town	Reading
Postcode	RG1 8DB
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E: [REDACTED]@thamewater.co.uk
M: +44 (0) [REDACTED]

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

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

23 June 2023

South Oxfordshire District – Towersey Neighbourhood Plan 2023 to 2040

Dear Sir/Madam,

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

As you may be aware, Thames Water are the water and sewerage undertaker for the District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Section 5.10 TOW10 Supporting water infrastructure and 5.10.1-5.10.6

We generally support section 5.10 TOW10 and paragraphs 5.10.1-5.10.6 as they are in line with our previous representations.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

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

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

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

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

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

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

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

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

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

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

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

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

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we support paragraphs 5.10.3-5.10.4

Development within the vicinity of Sewage Treatment Works (STW) and Sewage Pumping Stations

The neighbourhood plan should assess the impact of any new development proposals within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187. Towersey Sewage Treatment Works is located approximately 500m north of the village centre.

We therefore support paragraph 5.10.6 in this respect as it is in line with the Agent of Change principle set out in the NPPF, paragraph 187.

Where development is being proposed within 800m of a STW or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station.

Paragraph 174 of the NPPF, February 2021, sets out that: *“Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...”*

Paragraph 185 goes on to state: *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”*

The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: *“Plan-making may need to consider:whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..”*

The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the

Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”

Water Efficiency/Sustainable Design

We support paragraph 5.10.5 as it is in line with our previous representations.

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

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

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

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

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

Paragraph 5.10.5 should be updated as follows:

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

Comments in relation to Flood Risk and SUDS

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

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

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

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

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

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

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

Development Sites

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

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

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

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

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

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

Yours faithfully,

[REDACTED]
Thames Water Property Town Planner

Response 7

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Towersey Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>For the attention of [REDACTED]</p> <p>Please find Natural England's response in relation to the above mentioned consultation attached.</p> <p>Kind regards,</p> <p>[REDACTED]</p> <p>Adviser Operations Delivery, Consultations Team Natural England County Hall Spetchley Road Worcester WR5 2NP</p> <p>Tel 0300 0603900</p> <p>mail to: consultations@naturalengland.org.uk</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 434904 NE Response.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	Adviser, Operations Delivery
Organisation (if relevant)	Natural England
Organisation representing (if relevant)	-
Address line 1	County Hall
Address line 2	Sretchley Road
Address line 3	-
Postal town	Worcester
Postcode	WR5 2NP
Telephone number	0300 0603900
Email address	consultations@naturalengland.org.uk

Date: 27 June 2023
Our ref: [REDACTED]
Your ref: Towersey Neighbourhood Plan



[REDACTED]
South Oxfordshire District Council

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

BY EMAIL ONLY

planning.policy@southandvale.gov.uk

T 0300 060 3900

Dear [REDACTED]

Towersey Neighbourhood Plan - Draft Neighbourhood Plan Consultation

Thank you for your consultation on the above dated 10 May 2023.

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

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

Natural England does not have any specific comments on the Towersey Neighbourhood Plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]
Consultations Team

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

Natural environment information sources

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

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

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

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

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

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

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

¹ <http://magic.defra.gov.uk/>

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

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

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

⁵ <http://magic.defra.gov.uk/>

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

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

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

Landscape

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

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

Wildlife habitats

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

Priority and protected species

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

Best and Most Versatile Agricultural Land

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

Improving your natural environment

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

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

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

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

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

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

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

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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

Response 8

Respondent Details

Information
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Towersey Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Dear Sir/Madam,</p> <p>Please find attached Oxfordshire County Council's response to the Towersey Final Submission Neighbourhood Plan. Email acknowledgment of this response would be greatly appreciated.</p> <p>Kind regards,</p> <p>[REDACTED]</p> <p>[REDACTED] Planner Strategic Planning [REDACTED]@Oxfordshire.gov.uk</p> <p>Oxfordshire County Council, County Hall, New Road, Oxford, OX1 1ND https://www.oxfordshire.gov.uk/</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: Oxfordshire County Council response - Towersey Neighbourhood Plan.pdf - [REDACTED]

Your details and future contact preferences

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Title	-
Name	██████████
Job title (if relevant)	Planner
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Organisation representing (if relevant)	-
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**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING
CONSULTATION:**

District: South Oxfordshire

Consultation: Towersey Neighbourhood Plan 2023–2040 (Submission Document)

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council welcomes the opportunity to comment on the Towersey Neighbourhood Plan and supports the Parish Council's ambition to prepare a Neighbourhood Plan.

Officer's Name: [REDACTED]

Officer's Title: Planner

Date: 28 June 2023

ANNEX 1
OFFICER ADVICE

District: South Oxfordshire

Consultation: Towersey Neighbourhood Plan 2023–2040 (Submission Document)

Team: Strategic Planning **Date:**

15/6/23

Strategic Comments

Following the County’s comments made to the Pre-Submission Draft in July 2022 there are additional comments made by Transport regarding this Neighbourhood Plan Final Submission.

Policy TOW6 Designation of Local Green Spaces on page 56 identifies several green spaces, however, a small amount of the Duck Pond area falls within Highway land. **Further details on this are within the Transport Response on page 5 of this response.**

The County Council has identified this potential conflict with one local green space designation in the Towersey Submission Neighbourhood Plan and our Highways land. **The County Council therefore request the boundary of the proposed Duck Pond Local Green Space is altered to exclude the small amount of Highways land.**

The amendment requested by archaeology in our pre-submission comments has been taken forward which is welcomed, as well as the addition of the digital infrastructure provision for new developments.

District: South Oxfordshire
Consultation: Towersey Neighbourhood Plan 2023–2040 (Submission Document)
Team: South and Vale Locality
Officer's Name: [REDACTED]
Officer's Title: Transport Planner **Date:**
14.06.2023

Transport Comments

Paragraph 3.11.4 on page 33

'The easy road access also has its downsides. As development in surrounding towns and villages increases and roads become more congested, so the roads through Towersey have become a "rat run". A traffic survey clearly indicated large numbers of vehicles entering and leaving the village at peak times on week days. For example, the close on 200 vehicles entering Towersey via Windmill Road on weekday mornings is very close to the number (around 175) leaving the village via Chinnor Road - the rest turning right out of Windmill Rd heading towards Thame. These numbers were closer to 65 and 35 respectively on Saturday on Sunday'

OCC Comment: The data mentioned in paragraph 3.11.4 has been obtained from an Oxfordshire County Council traffic survey. It would be useful for the parish to explain the data further and indicate whether these numbers are southbound or northbound traffic flows and specify to which morning hours they are referring.

Paragraph 3.11.5 on page 33

'It is suggested to monitor traffic movements on a regular basis to establish how rapidly this issue is developing, and to use ANPR to monitor exact vehicle movements. It is clear however, that traffic calming and other measures to reduce the "rat run" will be very important to ensure the safety of local residents and the serenity of the village.'

OCC Comment: It would be useful for the parish to explain how the ANPR surveys will be funded and how the data be used to inform decision making.

Paragraph 5.9.3 on page 59

‘Traffic calming proposals to reduce speed and volume of traffic and the associated danger to pedestrians, cyclists and horse riders, will be supported. These may include permanent speed cameras for potential accident danger spots in the village and other traffic calming measures such as road design, introduction of cycle ways and any other mechanisms as outlined in ‘Traffic in Villages’ as permitted and promoted by OCC Highways and agreed by the Parish Council. This includes the new 20mph policy which will require consultation both at Council and village levels. However, any such measures must be carefully designed and located to reflect the rural character of The Parish and not require highways infrastructure – signage, barriers, pavements – that is more appropriate to an urban location.’

OCC Comment: We appreciate the desire to retain the rural character of the area, however there may be a scenario where a committed development requires mitigation that includes some of those elements listed in the paragraph above. It would be useful if you could indicate what specific measures you are envisaging instead.

Policy TOW6 Designation of Local Green Spaces on page 56

‘The Neighbourhood Plan designates the following locations, as shown on the Policies Maps, as Local Green Spaces:

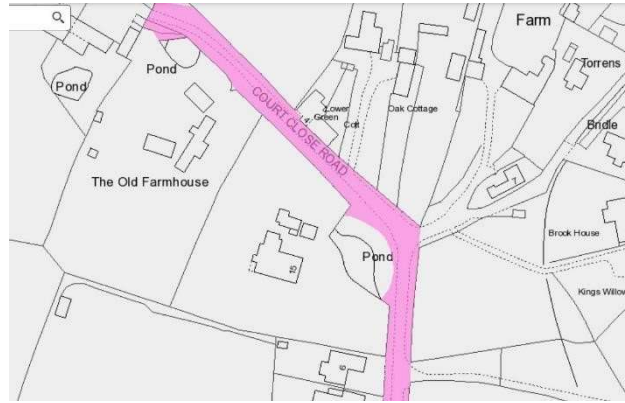
- 1. The Duck Pond*
- 2. The Village Green*
- 3. White’s Field*
- 4. The Three Horseshoes Garden*

Proposals for development within designated Local Green Space will only be supported in very special circumstances.’

OCC Comment: The land in Local Green Space ‘Duck Pond’ is partly within the maintained highway (they are within highway land and the County Council is the relevant Highway Authority). The parish should also check the other local green spaces and ensure they are not within the maintained highway.

Local Green Space – The Duck Pond

Highway Boundary Map



The plans above show the extent of maintained highway (shaded pink). This information can be found directly on the mapping tool on this webpage: [Map of streets we maintain | Oxfordshire County Council](#)

Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and repass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way. **Therefore, the County Council request the boundary of The Duck Pond Local Green Space is altered to exclude the small amount of Highways land.**

District: South Oxfordshire

Consultation: Towersey Neighbourhood Plan 2023–2040 (Submission Document)

Team: Archaeology

Officer's Name: [REDACTED]

Officer's Title: Lead Archaeologist **Date:**

24/05/23

Archaeology Comments

This neighbourhood plan (NP) has included the policy relating to archaeology we had previously requested.

We therefore have no further comments to make on this NP.