

# Lewknor Neighbourhood Plan - publicity period

## Response 1

### Respondent Details

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

Q1. Are you completing this form as an:
Individual

### Your comments

Q2. You can provide your comments on the Lewknor 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.
I have read the Plan and I fully support it, and thank the Neighbourhood Planning Group for their dedication to researching and producing the Plan.

### 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 Lewknor Neighbourhood Plan:
No, I do not request a public examination

### Your details and future contact preferences

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

<b>Title</b>	Mrs
<b>Name</b>	Ailsa Blackman
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	-
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	[REDACTED]
<b>Address line 2</b>	[REDACTED]
<b>Address line 3</b>	-
<b>Postal town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	-
<b>Email address</b>	[REDACTED]

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

[REDACTED]

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

[REDACTED]

# Response 2

## 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 Lewknor 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>South Oxfordshire District Council has worked to support Lewknor Parish Council in the preparation of their neighbourhood plan and compliments them on the submission of their comprehensive 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 Lewknor Neighbourhood Development Plan (NDP) during the pre-submission consultation.</p> <p>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.</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> <p>Yours faithfully [REDACTED]</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 2023-06-07 Lewknor Reg 16 DC Comments.pdf - [REDACTED]</li></ul>

## 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.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Senior Planning Policy Officer
<b>Organisation (if relevant)</b>	South Oxfordshire District Council
<b>Organisation representing (if relevant)</b>	-
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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]

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7 June 2023

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

South Oxfordshire District Council has worked to support Lewknor Parish Council in the preparation of their neighbourhood plan and compliments them on the submission of their comprehensive 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 Lewknor Neighbourhood Development Plan (NDP) during the pre-submission consultation.

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

[REDACTED]

[REDACTED]


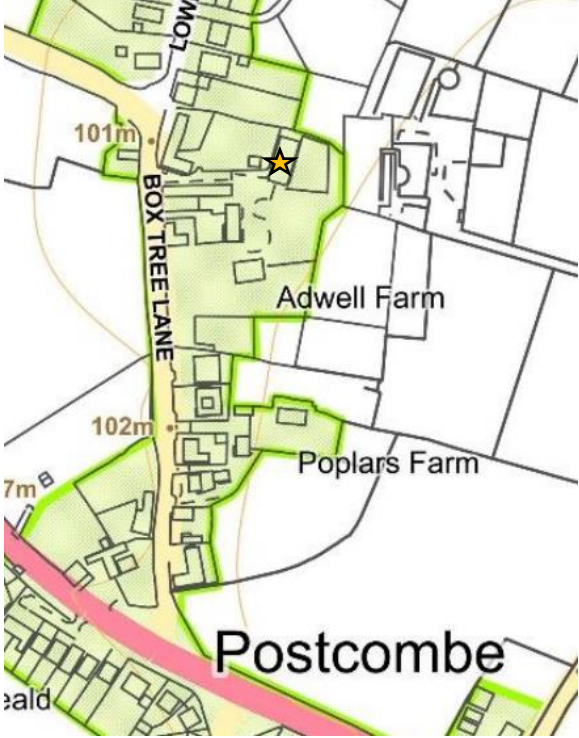
**Senior Planning Policy Officer (Neighbourhood Planning)**

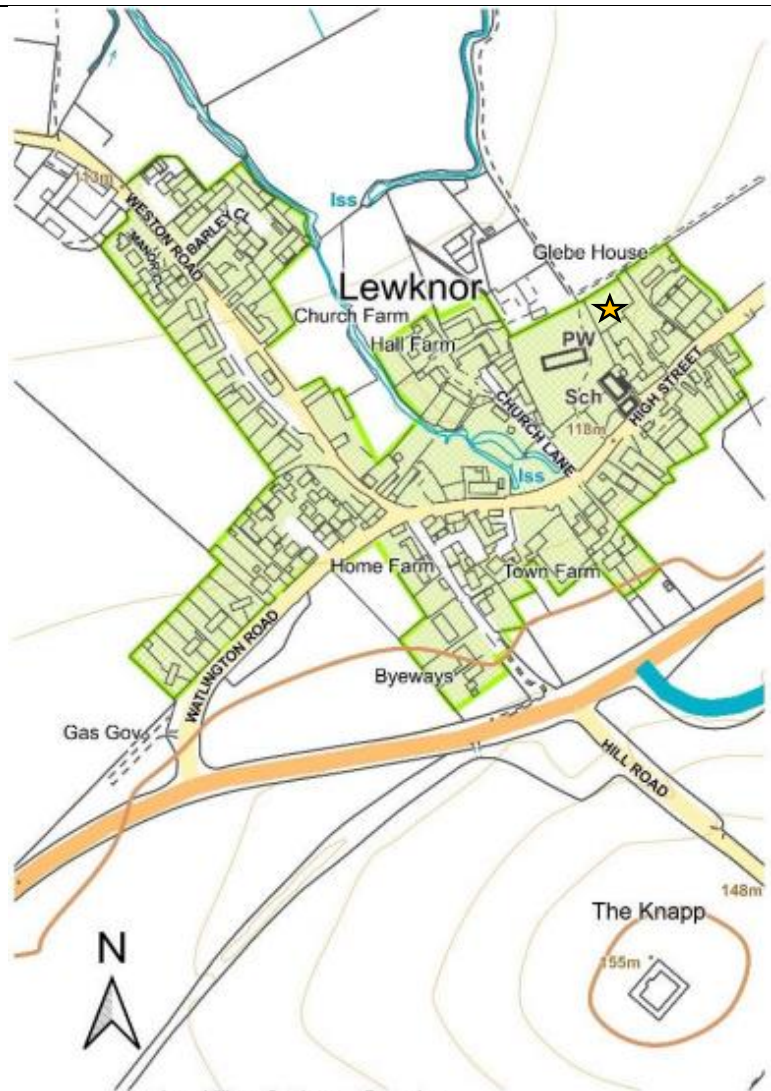
Ref	Section/Policy /Page	Comment/Recommendation
1.	General	As highlighted in our Regulation 14 comments, we continue to recommend that paragraph numbers are added to the NDP, for clarity and to enable precise reference.
2.	Page 4	<p>We recommend, for clarity, the following changes:</p> <p>South Oxfordshire District Council's Local Plan <b>2035</b> looks for housing growth in the towns and larger villages; there is no <b>defined</b> requirement <b>to deliver additional housing</b> for growth in "smaller", "other" or unclassified villages;</p>
3.	Page 7	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p>National Policy - Refers to policy set at Government level, and will therefore normally refer to policy specified in the National Planning Policy Framework (<del>February 2019</del> <b>July 2021</b>).</p> <p>Development Plan - The Local Plan as published by the current Local Planning Authority, South Oxfordshire District Council-, together with adopted Neighbourhood Plans <b>and Minerals and Waste Development Planning Documents (produced by Oxfordshire County Council)</b></p>
4.	Page 9 – Map	The key overlaps part of the Neighbourhood Area boundary on the map. We recommend rectifying this and removing the overlap, for precision and to prevent any ambiguity.
5.	Page 4 and 29 - Objective: 2. (Address any arising need for housing of an affordable nature for people with a connection to the Parish).	As highlighted in our Regulation 14 comments, our Affordable Housing Team recommended that this objective should be revised as it was not in accordance with the Council's housing policies; i.e., we highlighted that unless the housing development is a rural exception site (which 'seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection' (NPPF 2021, page 71)), any development with an affordable housing requirement will meet the needs of anyone in the district. We therefore recommend the removal of 'those with a local connection'; and the amendment of point 4 to 'promote sustainable development and to respond positively to any <b>local</b> need <del>from within the Parish</del> for more houses'.

Ref	Section/Policy /Page	Comment/Recommendation
		<p>For the same reason, we also recommend the following amendment to Page 4:</p> <p style="text-align: center;">This Plan is supportive of inclusion of homes which local young adults can afford to buy or rent and, <del>for those with a local connection,</del> affordable houses in any development.</p>
6.	Page 33	<p>We recommend the following amendments to provide the most up-to-date and accurate information:</p> <p>The National Planning Policy Framework seeks to ensure that the intrinsic character and beauty of the countryside is recognised (Section 15, para <del>170</del><b>174</b>). It also aims to ensure that housing in rural areas is sited where it will help maintain the vitality of the rural community and avoid isolated new homes in the countryside, unless there are special circumstances (paras <del>78 and 79</del> <b>and 80</b>).</p> <p>Policy ENV1 of the Local Plan <del>prevents the loss of</del> <b>protects the</b> landscape features <del>against</del> <b>harmful development</b></p>
7.	Page 34	<p>We recommend the following amendments, for clarity:</p> <p>Consequently, <b>the policy indicates that</b> no significant <b>housing</b> development should occur in the open countryside or around existing agricultural holdings (<b>other than in the limited circumstances set out in the Development Plan</b>). <del>These Development types in these locations</del> would also diverge from the current historic development pattern.</p>
8.	Page 35	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p>Planning Policy Framework paragraph <del>78</del> <b>79</b> states that housing in rural areas should be located where it will enhance or maintain the vitality of rural communities and National Planning Policy Framework paragraph <del>79</del> <b>80</b> sets out criteria required before isolated development can take place.</p>
9.	Page 36 – Map 2 – Settlement	<p>As highlighted in our Regulation 14 comments, the NDP includes what appear to be farm buildings within the settlement boundary. In Appendix 4 of the evidence base, the documents set out that the NDP has used the Cheshire East Council Settlement Boundary Assessment Guidance and included</p>

Ref	Section/Policy /Page	Comment/Recommendation
	Boundary for Lewknor Village	<p>this document. Part c) of this looks at the ‘functional relationship to use of built-up area’ and includes a list of things which settlement boundaries should generally exclude. One of these exclusions is <i>‘Farmsteads and associated outbuildings where their rural characteristics predominate and they appear related more strongly with the surrounding countryside. <u>Generally, agricultural buildings of modern construction should be excluded</u> whereas traditional stone or brick-built farm buildings which have historically been long associated with the settlement may be included within the settlement boundary’.</i></p> <p>We appreciate that the NDP has addressed a number of our Regulation 14 comments surrounding the Settlement Boundary – however, we recommend that the settlement boundary is still revised further for consistency and clarity with the guidance in relation to farm buildings of modern construction. Postcombe, as we highlighted previously, appears to contain farm buildings on the edge of the settlement which have been included in the settlement boundary. The agricultural building starred in yellow on the photograph overleaf and on the map, is recommended for removal, being of more modern construction. Agricultural buildings outside the boundaries would still be suitably captured by point vi. of Policy SS1 and by other national and local policies which address development in the countryside, outside of the settlement boundary.</p>



Ref	Section/Policy /Page	Comment/Recommendation
		<div style="display: flex; justify-content: space-around;">   </div> <p data-bbox="568 1054 2029 1270">Additionally, the NDP states, regarding settlement boundaries, that ‘in certain cases, a settlement boundary has been drawn to exclude a portion of a large garden or any other area of privately owned land if the development of part of that garden (or land) would result in an undesirable extension of the built-up area.’ However, the area of land starred in the map overleaf does not appear to form part of the built up area of the village and would likely conflict with the stated quotation – therefore for consistency we recommend this is also removed from the settlement boundary.</p>



Lewknor Village Settlement Boundary  
 Contains OS data © Crown copyright

Ref	Section/Policy /Page	Comment/Recommendation
10.	Page 37	<p>The following wording reads as policy text. As it generally repeats Local Plan policy, we recommend this is deleted:</p> <p style="text-align: center;"><del>Any building should be of appropriate scale, layout and form, respecting the surrounding character and landscape setting of the existing villages and should be located within the designated settlement boundaries unless appropriate to the specific countryside location.</del></p>
11.	Page 40	<p>As highlighted in our Regulation 14 comments, we continue to recommend this sentence is removed, for clarity, as this process sits outside of neighbourhood planning:</p> <p style="text-align: center;">‘An Article 4 Direction, which limits certain development which may take place without planning permission, may be appropriate for the Conservation Area if permitted development is causing, or would cause, a loss of its special interest, character and appearance.’</p>
12.	Page 40 – Policy CH1: Conserving Heritage and Appendix 3: Non-Designated Heritage Assets	<p><a href="#">Government guidance regarding the historic environment</a> (paragraph 040, reference ID 18a-040-20190723) highlights that ‘it is important that all non-designated heritage assets are clearly identified as such’. We recommend the insertion of a concise list of all non-designated heritage assets to be added either to the end of this policy, or as a table/numbered list in Appendix 3 (Non Designated Heritage Assets) page 7, paragraph 5, which states ‘The buildings and sites selected as non-designated heritage assets are’. The detailed descriptions of each can then follow this list.</p> <p>As Appendix 3 is a new document, there does not appear confirmation that landowners have been informed of the wish to designate properties/buildings as non-designated heritage assets and we would encourage confirmation to be sought that this has taken place.</p>
13.	Page 40 – 41 and Policy CH2: Landscape Character	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p style="text-align: center;">In conformity with the Local Plan policy ENV8 and National Planning Policy Framework paragraph 200<b>206</b>, development must have a positive outcome for the <del>conservation and</del> enhancement of the Conservation Area, including consideration of the contribution made by its setting.</p>

Ref	Section/Policy /Page	Comment/Recommendation
		<p>Policy CH2: Landscape Character:</p> <p>SODC Local Plan 2035 Policy ENV1: Landscape and Countryside addresses the AONB and requirements for Landscape Visual Impact Assessments (LVIA). National Planning Practice Guidance highlights that Neighbourhood Plan should provide an additional level of detail and/or a distinct local approach to that set out in the strategic policy. As the paragraph below largely repeats the Local Plan policy and therefore does not provide this additional level of local detail, we recommend it is deleted, or at least moved to the supporting text:</p> <ul style="list-style-type: none"> <li>• <del>All new development which could have an impact on the Chilterns Area of Outstanding Natural Beauty (AONB) or setting of the AONB should be accompanied by a Landscape Visual Impact Assessment (LVIA) following the Guidelines for Landscape and Visual Impact Assessment, latest edition, as part of an application.</del></li> </ul>
14.	Page 42 – Policy CH3: Protection of Views	<p>To ensure this policy has the clarity required by national policy and guidance, we recommend the following addition to criteria i:</p> <p>i. Any proposed development should preserve or enhance the local character of the landscape and not have a significant adverse impact on the identified important views <b>set out below</b>.</p>
15.	Page 43	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p>Footnote 7 NPPF paragraph <del>445-176</del>  Footnote 10 NPPF paragraph <del>446-177</del> <i>(and update the quoted text to match the paragraph)</i>  Footnote 11 Planning Practice Guidance <del>8-004-20140306 Paragraph 005</del> <b>Paragraph 041</b>  <b>Reference ID: 8-041-20190721</b></p> <p>We also recommend the following amendment, for clarity and precision, as the AONB has a different planning status/weight to conservation of wildlife and cultural heritage, for example.</p>

Ref	Section/Policy /Page	Comment/Recommendation
		<p>In policy terms they have the same planning status as National Parks<sup>7</sup> <b>with the highest status of protection in relation to landscape and scenic beauty.</b></p>
16.	Page 44	<p>Paragraph v ('In determining compliance with criterion (a) in the policy below') does not make it clear whether it is referring to a) in the supporting text directly below it, or the first criterion (i) in the 'policy' it refers to. We recommend the following amendments, to ensure precision:</p> <p>v. In determining compliance with criterion (<del>a</del> <b>i</b>) in the policy below</p>
17.	Page 45 – Policy CH4: The Chilterns Area of Outstanding Natural Beauty	<p>Because it is the Local Planning Authority that ultimately gives planning permission, we recommend the following amendment to this policy, for precision:</p> <p><del>Permission for m</del>Major developments in the Chilterns Area of Outstanding Natural Beauty will <del>be refused</del> <b>not be supported</b> unless exceptional circumstances prevail and where it can be demonstrated that development is in the public interest, as defined by national planning policy. <del>Planning permission for any</del> <b>Development</b> proposals within the Chilterns Area of Outstanding Natural Beauty, or affecting the setting of the Chilterns Area of Outstanding Natural Beauty, will only be <b>supported where they</b> granted <del>when it:</del></p> <p>i. <del>conserves and enhances</del> the Chilterns Area of Outstanding Natural Beauty's special qualities...</p> <p>This policy also makes reference to the Chilterns AONB management and Building Design Guide. These are important material considerations in assessing applications and should be treated as such. To ensure this policy has the clarity required by national policy and guidance, we recommend the following amendments:</p> <p>iii. <del>meets the aims of</del> <b>has regard to</b> the statutory Chilterns Area of Outstanding Natural Beauty Management Plan, making practical and financial contributions towards management plan delivery as appropriate</p>

Ref	Section/Policy /Page	Comment/Recommendation
		<p>iv. <del>complies</del> <b>has regard to</b> with the Chilterns Building Design Guide and technical notes by being of a high-quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character</p>
18.	Page 47 - Policy DC1: Character of Developments	<p>The South Oxfordshire Design Guide was superseded by the Joint Design Guide in 2022. To provide up to date information, we recommend that all references to the South Oxfordshire Design Guide in this policy (i.e., criteria i and ii) and throughout the plan are replaced.</p> <p>This policy makes reference to the Chilterns Building Design Guide. Whilst this is an important material consideration in assessing applications and should be treated as such, as this document has not been adopted by SODC, compliance with this document can not be a policy requirement in the neighbourhood plan.</p> <p>Our Development Management Officers have also highlighted that, in relation to Criterion v), many changes can be actioned without permission – for example, the removal of hedges or the amalgamation of plots.</p> <p>We recommend the following amendments for clarity:</p> <ul style="list-style-type: none"> <li>i. implement the best practices set out in <del>the Chilterns Buildings Design Guide and the South Oxfordshire District Council</del> <b>Joint Design Guide</b>; and <b>have regard to the Chilterns Buildings Design Guide</b></li> <li>ii. where a Design and Access Statement is required and the development is in the Chilterns Area of Outstanding Natural Beauty or its environs it should explain how it complies with the <del>Chilterns Buildings Design Guide and the</del> <b>Joint Design Guide and has regard to the Chilterns Buildings Design Guide</b></li> </ul> <p>(...)</p>
19.	Page 47 – 49 General	<p>These pages, under the topic of ‘Design’, quite abruptly change from the sub-topic of lighting and dark skies, to parking. We suggest, to ensure the clarity required by national guidance, that subheadings are</p>

Ref	Section/Policy /Page	Comment/Recommendation
		inserted in these pages (i.e. 'Lighting and Dark Skies' and then 'Parking') and that map 5 (dark skies) is moved to page 48, to sit with its appropriate supporting text.
20.	Page 49 – Policy DC2: Design Principles	<p>It should be noted that some of the changes that are described in the preceding supporting text (e.g. some changes to boundary treatments, front drives, lighting) may not require planning permission (i.e. because they are permitted development, or because they are not development) and therefore would not be controlled by this policy.</p> <p>There are also a number of different criterion in the numbered list that would not be relevant for planning applications for an extension or other alterations to an existing building. We therefore recommend, for clarity, that 'where appropriate' is inserted into the text, to aid decision-makers' application of the policy.</p> <p>We recommend the following amendments for clarity:</p> <p style="padding-left: 40px;"><del>An application</del> <b>Proposals</b> for a new development or for changes to existing buildings, including extension or change of use, <del>must</del> should have a <del>demonstrate how the</del> design and layout that fits in with the local character of the area and, <b>where appropriate</b>, address <del>s</del> each of the following points:</p> <p>Our Tree Officer has highlighted recently that due to our changing climate, it is not always appropriate to plant native species. Instead, they recommend requiring appropriate species for the site's growing conditions. Therefore, we recommend the following amendment, to ensure the policy is drafted with sufficient clarity that a decision maker can apply it consistently:</p> <p style="padding-left: 40px;">iv. boundary treatments to highways and village lanes should comprise, <b>where possible</b>, native hedgerow (<b>or species appropriate to the site's growing conditions</b>), or stone, brick or flint boundary walls as appropriate to the immediate context of the site</p>

Ref	Section/Policy /Page	Comment/Recommendation
		<p>We recommend the following amendments to ensure criterion viii can be applied with clarity and consistency by decision-makers and recommend removing the section regarding parking standards that is not 'distinct', as advised in national guidance:</p> <ul style="list-style-type: none"> <li>viii. proposed parking arrangements for residents and their visitors incorporate solutions that: <ul style="list-style-type: none"> <li>• avoid large expanses of communal parking or the loss of vegetation along the roadsides and</li> <li>• do not necessitate parking on village lanes and</li> <li>• have a minimal impact on the street scene.</li> </ul> </li> </ul> <p>All new residential developments <del>must conform to</del> <b>should provide for the parking of vehicles in accordance with</b> Oxfordshire County Council's parking standards, <b>unless specific evidence is provided to justify otherwise.</b></p> <p>We recommend that criterion ix is also amended to be factually accurate, as NDPs do not give planning permission, and recommend the removal of the word 'small' which is ambiguous and lacks the precision required by national guidance:</p> <ul style="list-style-type: none"> <li>ix. unless impracticable, garages must be built in direct association with the houses whose inhabitants may be expected to use them. They must be spacious enough to accommodate modern cars and bicycles. Proposals for separate parking areas would not be <del>permitted</del> <b>supported</b> unless alternative provision is impracticable. In such instances they should be <del>small,</del> discreet and located out of view of the road</li> </ul> <p>We also recommend, for clarity and distinction, that this policy is divided into two, with the lighting and dark skies aspects (vi, vii and xii) moved into a <b>Policy DC2a: Lighting and Dark Skies</b>. This will ensure it can be applied consistently and with confidence by decision-makers. To ensure this policy has the clarity required by national policy and guidance, we recommend the following amendment to xii:</p>



Ref	Section/Policy /Page	Comment/Recommendation
		<p>xii. roads and footpaths <del>must</del> <b>should</b> not feature street and/or path lighting unless it is a requirement of a statutory body, in which case it <del>should use optimal</del> <b>renewable energy green solutions (such as solar lighting) are encouraged.</b></p> <p>We recommend the removal of the last sentence of criterion xiii to provide clarity (as the last half of the sentence reads as supporting text rather than policy, and it is not clear that highways/traffic issues are directly related to the Design topic).</p> <p>xiii. it should avoid the installation of kerbs to new or existing village lanes or roads, <del>or but</del> where this is not possible the use of more sympathetic materials / construction design, as identified <del>on pages 18 and 19 of</del> <b>in</b> Oxfordshire County Council's 'Residential Road Design Guide' should be used in preference to the installation of precast concrete kerbs. <del>New development should not have a detrimental impact on the local highways network, unless mitigated appropriately, especially with regard to the rural country lanes which are unsuitable for high volumes of traffic or large vehicles</del></p> <p>We recommend the following amendments to criterion xiv, to ensure precision (i.e. dust is an Environmental Health, rather than Planning issue) and to allow it to be applied consistently:</p> <p>xiv. developments should contribute to the provision of cleaner air and reduce pollution by adopting techniques which minimise or avoid <b>carbon emissions</b> <del>greenhouse gases and dust</del></p>
21.	Page 51 – Policy DC3: Sustainable Design	<p>We recommend the following amendments, for clarity and precision:</p> <p>ii. how the development has been <del>made</del> <b>“future proofed”</b> for the provision of modern technology, such as high-speed broadband, electric vehicle <del>recharging</del> <b>recharging</b> points and ground or air source heat pumps</p>

Ref	Section/Policy /Page	Comment/Recommendation
22.	Page 53 - Policy EN1: Wildlife and Biodiversity	<p>Regarding criteria i, as set out in our Regulation 14 response, we highlighted that it may not be possible for provisions to be made on site. We therefore continue to recommend that the following wording is added:</p> <p><i>‘or in an approved alternative location in accordance with a compensation scheme provided as a condition of planning permission’</i></p> <p>As we highlighted in our Regulation 14 comments, Development Management officers have queried the phrase 'species-specific equivalent replacements' – e.g. if this means a tree that might be lost must be replaced by the same species of tree, this is not necessarily appropriate as existing species may not be the most suitable for the location, changing climate, or may be susceptible to disease. We therefore recommend the following amendment:</p> <p>i. (...) Where the loss of a mature tree or hedgerow is unavoidable, the proposals must make provision on site for <del>UK-sourced and species-specific equivalent replacements</del>. <b>species appropriate to the site’s growing conditions...</b></p> <p>We recommend the following amendments to criterion ii for the same reason, and suggest the removal of the second part of this criterion, as referring to ‘features’ lacks precision and may not be possible to be applied consistently:</p> <p>ii. Where appropriate, incorporate landscape schemes which use <b>species appropriate to the site’s growing conditions</b> <del>local indigenous trees and features which form part of the vernacular in the immediate area</del></p> <p>We additionally recommend the removal of sentences relating to ‘wildlife corridors’ in this policy (criterion i and iv); as these are not mapped or addressed in sufficient detail elsewhere in the plan or appendices; and therefore are not supported by appropriate evidence.</p>

Ref	Section/Policy /Page	Comment/Recommendation
		<p>iv. <del>Protection of wildlife corridors which allow wildlife to move from one area of habitat to another.</del> Fences, walls or hedges should be designed to incorporate features which allow safe dispersal of wildlife through areas of green space and gardens</p> <p>We recommend the following criterion is amended to be precise, as well as factually accurate, as NDPs do not give planning permission:</p> <p>x. Development on land within or <del>outside</del> <b>adjoining</b> the Sites of Special Scientific Interest in the Parish, the areas of Ancient Woodland and the Special Area of Conservation, and which is likely to have an adverse effect on it any of them (either individually or in combination with other developments), <b>will not be supported</b> <del>should not normally be permitted</del>. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest</p>
23.	Page 55 – Policy EN2: Aston Rowant National Nature Reserve	<p>As set out in our Regulation 14 response, whilst we acknowledge that this is an important and significant part of the parish, the Aston Rowant National Nature Reserve is an area which already benefits from the highest level of protection through law, national and local policy. The majority of this policy is therefore duplicating information which is already contained in local and national policy. National Planning Practice Guidance highlights that Neighbourhood Plans should provide an additional level of detail and/or a distinct local approach and we therefore recommend that criteria i and ii of this policy are deleted, as the Aston Rowant National Nature Reserve/SSSI/ Special Area of Conservation is already sufficiently protected.</p> <p>We also recommend that the remaining criteria iii is amended to ‘results <b>in at least a 10%</b> biodiversity net gain’ to align with <a href="#">Schedule 14 of the Environment Act (2021)</a> and therefore to have regard to national policies and advice.</p>
24.	Page 55	We recommend the following amendments, to ensure clarity, as the current text reads as policy wording (via the use of ‘should’) when it is supporting text:

Ref	Section/Policy /Page	Comment/Recommendation
		<p><del>Any development should</del> <b>Schemes are encouraged to</b> take account of the Chilterns Area of Outstanding Natural Beauty Management Plan Chapter 7 (Land, Woodland and Nature), so as to maximise biodiversity, through land management approaches for example grazing regimes, restoring hedgerows, reinstating ponds, reverting arable land to chalk grassland, and joining up islands of ancient woodland or chalk grassland.</p> <p><del>Any development should</del> <b>Schemes are encouraged to</b> aim to reduce trip generations reliant on the M40 and/or other routes close to the Aston Rowant National Nature Reserve.</p>
25.	Page 56	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p>National policy (NPPF <del>470</del><b>174</b>) states planning policies and decisions should contribute to and enhance the natural and local environment</p>
26.	Page 57	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p>This approach has regard to both National Planning Policy (NPPF <del>470</del><b>174</b>)</p>
27.	Page 58	<p>We recommend the following amendments to provide the most up-to-date information:</p> <p>All references to NPPF 99 should be amended to <b>101</b></p> <p>Para <del>400</del> <b>102</b> offers the guidance</p> <p>Para <del>404</del> <b>103</b> states that Policies for managing development within a Local Green Space</p>
28.	Page 58-9 Policy F11: Local Green Spaces	<p>We recommend highlighting that the Local Green Spaces are designated, to ensure clarity, as set out, for example, in the <a href="#">East Hagbourne Neighbourhood Plan (page 55)</a>. We additionally recommend that 'not be permitted' is amended to 'not be supported', as NPPF paragraph 103 states that policies for</p>

Ref	Section/Policy /Page	Comment/Recommendation
		<p>managing development within a Local Green Space should be consistent with those for Green Belts. We therefore recommend the following amendments:</p> <p style="text-align: center;"><b>The Lewknor Neighbourhood Plan designates the following locations as Lewknor Parish Local Green Space:</b></p> <p style="text-align: center;"><i>(insert list)</i></p> <p>New development will not be <del>permitted</del><b>supported</b>, except in <b>very special</b> exceptional circumstances, on the <del>Lewknor Parish</del> Local Green Spaces...</p>
29.	Page 61	We recommend that the extract from the National Planning Policy Framework Section 2 - Sustainable Development is updated with the NPPF 2021 text, to provide the most up to date information.
30.	Page 62-63	The paragraphs in the 'Utilities' topic abruptly change from the sub-topics of water/flooding to communications. For sufficient clarity, we recommend adding sub-topic titles to these pages.
31.	Page 63	<p>The following supporting text reads as policy wording (with its use of 'shall' and 'should'). We recommend this is deleted, or alternatively moved into the policy, for clarity and to ensure it can be applied consistently:</p> <p style="text-align: center;">Proposals which result in the run off of surface water into the stream network of the village shall ensure the water flows through an appropriate sustainable drainage system. Actions to mitigate flood risk should not damage the natural environment in the process of ensuring that waterways have sufficient capacity.</p>
32.	Page 63 - Policy FI5: Utilities	The water supply aspect of this policy does not provide an additional level of detail and/or a distinct local approach and has many similarities with Policy INF4: Water Resources. We therefore recommend this aspect of the policy is deleted.

Ref	Section/Policy /Page	Comment/Recommendation
33.	Page 64 – Policy FI6: Employment, Economic and Commercial Development	<p>To ensure precision (for example, there are no towns within the Neighbourhood Area; and Neighbourhood Plans do not grant planning permissions) we recommend the following amendments to this policy:</p> <p style="text-align: center;"><del>...should not</del> <b>have a severe residual cumulative impact on the road network</b> <del>significantly increase the number of lorries on unsuitable roads or where there would be serious</del> <b>or give rise to significant</b> adverse effects on the environmental quality of the rural areas, <del>towns and villages</del> <b>within the Neighbourhood Area</b> <del>will not be permitted, which fits with the current Local Plan and should identify the way in which they would be satisfactorily accommodated within the local highways network.</del></p>
34.	Page 67 Policy H11: Housing Mix	We recommend the deletion of this policy ('Proposals for new residential development should consist of an appropriate mix of properties') as it is not locally-specific and echoes Local Plan 2035 Policy H11: Housing Mix.
35.	Page 70 Policy TH2: Vehicle Traffic	<p>We recommend the deletion of criterion i, as changes to traffic signage and other traffic management devices fall outside the scope of planning:</p> <p><del>i. Ensuring that traffic calming measures and signage are appropriate to the character and rural nature of the Parish</del></p>
36.	Page 73	<p>South Oxfordshire District Council adopted its new CIL Charging Schedule in December 2022. To ensure the most up to date information is provided, we recommend the following amendments:</p> <p style="text-align: center;"><del>South Oxfordshire District Council has set rates (from 1 January 2023</del> <b>January 2023)</b> for residential development at <del>£182.48</del> <b>260</b> per square metre in <b>Lewknor's parish, classed as Zone 3</b>. The average 3 bedroom house is 110-120 square metres. These rates may change within the life time of this Plan. 25% of the Levy comes to the Parish Council if there is a Neighbourhood Plan in place; otherwise 15%, <b>subject to a cap of £100 per existing council</b></p>

Ref	Section/Policy /Page	Comment/Recommendation
		<del>tax dwelling per year. For example, a nine house development at 100 square metres each might raise £41,000 for the Parish Council.</del>

### Typographical Recommendations

Ref	Section/Policy /Page	Typographical amendments recommended, for clarity:
37.	Page 29	1. Ensure there is adequate parking provision <del>in the</del> within any future development.
38.	Page 34	By defining the boundaries on the Policy's Maps
39.	Page 41	This has regard to <del>both the</del> South Oxfordshire Local Plan policy ENV 1 Landscape and Countryside: 1. "The highest level of protection will be given to the landscape and scenic beauty of the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBSs)"
40.	Page 45	(including the Ridgeway National Trail)
41.	Page 46	The character assessment fully documents the existing character, including the prevalence of two storey dwellings and the natural rhythm of front gardens and curtilages, particularly the open feeling as houses are not built close to both sides of roads.
42.	Page 52	notably roe <del>deer</del> deer migrate
43.	Page 67	(NPPF, July 2021, p. 6416).





# Response 3

## Respondent Details

Information
[Redacted]

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Lewknor 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.
Response received by email.

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: SSE 20-4.pdf - [Redacted]</li></ul>

## 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.
<b>Title</b> [Redacted]
<b>Name</b> [Redacted]
<b>Job title (if relevant)</b> Network Connections Planning Engineer

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.

<b>Organisation (if relevant)</b>	Scottish and Southern Electricity Networks
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	1 Woodstock Road
<b>Address line 2</b>	Yarnton
<b>Address line 3</b>	Kidlington
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX5 1NY
<b>Telephone number</b>	01865 845888
<b>Email address</b>	██████████@sse.com

[Redacted]

**From:** [Redacted]@sse.com>  
**Sent:** 20 April 2023 15:53  
**To:** Planning Policy S&V  
**Subject:** Your comments are invited on the Lewknor Neighbourhood Plan

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**\*\*EXTERNAL\*\***

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[Redacted],

Thank you for your message below, together with the link to the NP web-site, regarding the above topic / location.

I can confirm that, at this present time, I have no comments to make.

Regards,

[Redacted]

[Redacted]

Network Connections Planning Engineer

**Scottish and Southern Electricity Networks**

1 Woodstock Road  
Yarnton  
Kidlington OX5 1NY

**T: External:** + 44 (0) 1865 845888

[Redacted]



## Response 4

### Respondent Details

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the Lewknor 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.

Response sent via email

Q3. You can upload supporting evidence here.

- File: Coal Authority.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)** -

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.

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

**From:** The Coal Authority-Planning <TheCoalAuthority-Planning@coal.gov.uk>  
**Sent:** 04 May 2023 15:17  
**To:** Planning Policy S&V  
**Subject:** RE: [External] Your comments are invited on the Lewknor Neighbourhood Plan

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**\*\*EXTERNAL\*\***

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Thank you for your notification of 19 April 2023 regarding the Lewknor Neighbourhood Plan.

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.

Kind regards

**The Coal Authority Planning Team**

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# Response 5

## 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 Lewknor 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 [REDACTED]</p> <p>[REDACTED]</p> <p>Your Ref: Lewknor NDP Regulation 14 Consultation</p> <p>Please find the attached consultation response from Natural England.</p> <p>Kind regards</p> <p>[REDACTED] - Sustainable Development Lead Adviser Thames Solent Team Natural England</p> <p>Red Kite House Howbery Park Crowmarsh Gifford Wallingford Oxfordshire OX10 8BD</p> <p>[REDACTED]</p> <p>0300 060 3900</p> <p><a href="http://www.naturalengland.org.uk">www.naturalengland.org.uk</a></p>

Q3. You can upload supporting evidence here.

- File: Lewknor NDP Regulation 14 Consultation.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.

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	Sustainable Development Lead Advisor
<b>Organisation (if relevant)</b>	Natural England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Red Kite House
<b>Address line 2</b>	Howbery Park
<b>Address line 3</b>	Crowmarsh Gifford
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX10 8BD
<b>Telephone number</b>	0300 060 3900
<b>Email address</b>	[REDACTED]@naturalengland.org.uk

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

[REDACTED]



Date: 24 May 2023

Your ref: Lewknor NDP Regulation 14 Consultation



Planning.policy@southandvale.gov.uk

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear [REDACTED]

### **Lewknor Neighbourhood Plan Regulation 14 Consultation**

Thank you for your consultation on the above dated 19 April 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 this draft neighbourhood plan.**

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

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto: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](#)<sup>1</sup> 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](#)<sup>2</sup>.

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

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](#)<sup>5</sup> website and also from the [LandIS website](#)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> 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.**

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<sup>1</sup> <http://magic.defra.gov.uk/>

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

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

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

<sup>5</sup> <http://magic.defra.gov.uk/>

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

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

<sup>8</sup> <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](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. 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](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> 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](#)<sup>13</sup>.

## **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.

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

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

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

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

<sup>13</sup> <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](#) <sup>14</sup>).
- 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).

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<sup>14</sup> <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 6

## Respondent Details

Information
[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments


Q2. You can provide your comments on the Lewknor 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.
Comments received via email

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

## 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 [REDACTED]

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.

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

[Redacted]

**From:** [Redacted]  
**Sent:** 24 May 2023 16:10  
**To:** Planning Policy S&V  
**Subject:** Lewknor Neighbourhood Plan

**\*\*EXTERNAL\*\***

Good afternoon

At the meeting of Tetsworth Parish Council on May 15<sup>th</sup> it was agreed that the following comments were to be made in respect of the Lewknor Neighbourhood Plan -

**'Lewknor have undertaken a huge exercise in this is a long and comprehensive document that is evidence and process based, and that includes a great deal of information and sensible Policies. Tetsworth Parish Council have nothing further to suggest but commend Lewknor for this document.'**

All the very best and kindest regards, [Redacted]

[Redacted]  
Clerk / RFO  
Tetsworth Parish Council  
[Redacted]

This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

# Response 7

## Respondent Details

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

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Lewknor 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>Dear SODC Neighbourhood Plans Policy Team,</p> <p>Please find attached a response from the CCB. We only have one, relatively minor, text amendments to propose and warmly welcome this Neighbourhood plan, which has taken onboard many points raised during the earlier consultation in 2020.</p> <p>Feel free to come back, should any questions arise. Many thanks. Best Wishes.</p> <p>[REDACTED] Planning Advisor The Chilterns Conservation Board The Lodge Station Road Chinnor Oxfordshire OX39 4HA Chilterns Conservation Board</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: LEWKNO~1.PDF - [REDACTED]</li></ul>



## 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.

<b>Title</b>	■
<b>Name</b>	■■■■■■■■■■
<b>Job title (if relevant)</b>	Planning Advisor
<b>Organisation (if relevant)</b>	The Chilterns Conservation Board
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	The Lodge
<b>Address line 2</b>	Station Road
<b>Address line 3</b>	Chinnor
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX39 4HA
<b>Telephone number</b>	01844 355507
<b>Email address</b>	planning@chilternsaonb.org



Contact: [REDACTED]  
Tel: 01844 355507  
Fax: 01844 355501  
E Mail: [planning@chilternsaonb.org](mailto:planning@chilternsaonb.org)  
[www.chilternsaonb.org](http://www.chilternsaonb.org)

Chairman: [REDACTED]  
Vice Chairman: [REDACTED]  
Chief Officer: [REDACTED]

**1<sup>st</sup> June 2023**

**By email only to [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk).**

My Ref. [REDACTED]

### **Lewknor Neighbourhood Plan 2023-2040**

The Chilterns Conservation Board (CCB) has previously commented on the regulation 14 consultation (July 2020) and is very supportive of this Neighbourhood Plan.

CCB commends the vision and spatial strategy in the plan and the early engagement with parties, including the CCB itself. The Plan includes a detailed evidence base, including landscape evidence in the form of a detailed character assessment.

To assist, we set out the duties and responsibilities of the CCB in Annex 1, at the end of these representations. For ease of reference we have tabulated our points, with additional text as underlined or deleted text as '~~strikeout~~' text. All **bold text** denotes existing policy or supporting content in the pre-submission Neighbourhood Plan.

We only have a few, relatively minor, additional points of clarification to add.

<b>Lewknor Neighbourhood Parish Neighbourhood Plan</b>	<b>CCB points in support and justification of these amendments and/or additional details.</b>
<b>8.1 Vision</b>	We support this vision.
<b>8.2 Aims and Objectives</b>  <b>2. To conserve the local landscape and environment, including the local and nationally protected landscapes, and to minimise the negative impacts of development on the surrounding countryside, landscape and ecosystems.</b>	We support these aims, which include and refer to the nationally protected status of the AONB landscape.

<b>Objectives</b>	We support these objectives.
<p><b>Policy SSI: Settlement boundaries – Lewknor and Postcombe</b></p> <p>CH1: Village Character  CH2: Conserving Heritage  CH3: Landscape Character  CH4: Protection of Views  CH5: The Chilterns Area of Outstanding Natural Beauty</p> <p>Prevent negative impact on the Aston Rowant National Nature Reserve and the Area of Outstanding Natural Beauty, including the reduction and mitigation of noise impacts and appropriate air quality management measures.</p>	<p>We support these policies.</p> <p>We support the inclusion of additional policy wording on matters relating to noise impacts and air quality management measures.</p> <p>We support the introduction of a dark skies policy.</p>
<p><b>EN1:</b> Wildlife and Biodiversity  <b>EN2:</b> Aston Rowant National Nature Reserve</p> <p>Conserve and enhance the local environment and its flora and fauna. Prevent negative impact on the Aston Rowant National Nature Reserve and the Area of Outstanding Natural Beauty. Protect and enhance the countryside and important features of landscape character around the settlements of Lewknor Parish within the AONB.</p>	All supported.
<b>11.2 Landscape Character and Policy CH 2 Landscape Character.</b>	We support this policy and the inclusion of text to reinforce the point that, 'The location of the Parish as a constituent part of the setting of the AONB. Any planning proposal should not detract from this relationship in which the Parish contributes to the wider setting of the Chilterns'.
<b>Policy CH3: Protection of Views</b>	We support this policy.
<b>11.4.and Policy CH 4 - The Chilterns Area of Outstanding Natural Beauty</b>	<p>We support these policies and the supporting text and reference to the CCB's Position Statement on Setting.</p> <p>We welcome reference to the text that deals with the impacts of the M40, as any works to the design and configuration of the motorway, as may be countenanced in the future, must take account of the duties in the CROW Act 2000 to protect the AONB and its setting.</p> <p>We welcome and support Policy CH 4 which specifically deals with the Chilterns AONB.</p>
<b>Policy DC 1</b>	We support this policy.

<p><b>Policy DC2: Design Principles</b></p>	<p>We support this policy.</p> <p><u>Our understanding is that the section vi. reference to Institute of Lighting Professionals guidance CIE 150:2017 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations is now the 2021 version.</u></p> <p><u>Citation of this would be, Guidance Note 1 for the reduction of obtrusive light (2021) and ILP reference SKU: GN01-21.</u></p>
<p><b>13.2. Aston Rowant National Nature Reserve</b></p>	<p>We support this policy.</p> <p>Air quality is material. The site is in close proximity to the internationally designated Chilterns Beechwoods Special Area of Conservation (SAC) and the Aston Rowant Special Area of Conservation. Both of these SACs have already breached the critical loads for air pollution. Natural England’s Supplementary Advice for Chiltern Beechwoods SAC of November 2018 explains (page 12) that <i>“The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.”</i></p> <p><u>(see <a href="https://publications.naturalengland.org.uk/publication/4808896162037760">//publications.naturalengland.org.uk/publication/4808896162037760</a>).</u></p> <p>The Plantlife report states ‘We need to talk about Nitrogen’ offers further details and reports that <i>‘Woodlands, grasslands, heaths and bogs have all become colonised by nitrogen-loving plants, with knock-on effects for all our wildlife. In 2014, 90% of land in Special Areas of Conservation (SACs) in England and Wales received excessive levels of nitrogen; for the UK as a whole it was 63%’</i> (nitrogen enrichment being a consequence of burning fossil fuels, intensive farming, transport system, power stations, industry,</p>

	<p><i>farm fertilisers and livestock are all major sources of nitrogen oxides and ammonia emissions)</i>'.</p> <p>(See <a href="https://www.plantlife.org.uk/uk/our-work/publications/we-need-to-talk-about-nitrogen">https://www.plantlife.org.uk/uk/our-work/publications/we-need-to-talk-about-nitrogen</a>)</p>
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In conclusion, this Neighbourhood Plan is comprehensive, evidence based and well produced. We positively endorse and support this Neighbourhood Plan and commend the AONB and related policies within it.

The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of [CroW Act](#)).

The Chilterns Conservation Board is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB. It is made up of representatives nominated by the organisations listed in Appendix I.



**The Chilterns Area of Outstanding Natural Beauty**

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

**Chilterns Conservation Board**

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

**List of Organisations providing Nominees to the Chilterns AONB Conservation Board**

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Buckinghamshire Council (formerly Aylesbury Vale, Chiltern and South Buckinghamshire, and Wycombe District Council).
- Dacorum Borough Council, North Hertfordshire DC, Three Rivers DC and South Oxfordshire DC.
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- DEFRA (8 in total).

# Response 8

## Respondent Details

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

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Lewknor 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>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]@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"><li>File: Thames Water 1.6.pdf - [REDACTED]</li></ul>

## 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.

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





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Issued via email:  
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1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB

01 June 2023

## South Oxfordshire District – Lewknor Parish Neighbourhood Plan

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:

### **Policy F15: Utilities - Water Supply and Wastewater/Sewerage Infrastructure**

We support the reference to water supply and sewerage in part (i) of Policy F15, but consider the section should be amended in line with the following:

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 consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy to support section 11.1. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

### **PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT**

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

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

Lewknor is served by Lewknor STW which is situated north of Lewknor and south of South Weston. The STW is within 800 metres of the main town.

The Neighbourhood Plan should assess impact of any development 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.

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**

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.

Policy F15 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 9

## Respondent Details

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

Q1. Are you completing this form as an:
Agent

## Your comments

<p>Q2. You can provide your comments on the Lewknor 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>We write to you with regards to the current consultations as detailed above in respect of our client, National Grid.</p> <p>Please find attached our letter of representation. Please do not hesitate to contact me via <a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a> if you require any further information or clarification.</p> <p>Kind Regards</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>+44 01912690052 Mobile +44 [REDACTED] [REDACTED]@avisonyoung.com   <a href="http://avisonyoung.com">avisonyoung.com</a> Central Square South, Orchard Street, 3rd Floor, Newcastle upon Tyne NE1 3AZ</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 02-06 Lewknor National Grid.pdf - [REDACTED]</li></ul>

## 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.

<b>Title</b>	█
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Graduate Planner
<b>Organisation (if relevant)</b>	Avison Young
<b>Organisation representing (if relevant)</b>	National Grid
<b>Address line 1</b>	Central Square South
<b>Address line 2</b>	Orchard Street
<b>Address line 3</b>	3rd floor
<b>Postal town</b>	Newcastle-upon-Tyne
<b>Postcode</b>	NE1 3AZ
<b>Telephone number</b>	██████████
<b>Email address</b>	██████████@avisonyoung.com



Our Ref: MV/ 15B901605



02 June 2023

South Oxfordshire District Council  
[planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)  
**via email only**

Dear Sir / Madam

**Lewknor Neighbourhood Plan - Regulation 16 Consultation  
April - June 2023  
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document 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 Electricity Transmission**

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, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (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. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

**Proposed development sites crossed or in close proximity to NGET assets:**

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

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

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)



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

**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:  
[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

**Further Advice**

Please remember to consult NGET 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:

**[REDACTED], Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

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

**[REDACTED], Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid Electricity Transmission  
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,

[REDACTED]

**Director**

**0191 269 0094**

**[REDACTED]@avisonyoung.com**

**For and on behalf of Avison Young**

NGET 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.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET 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.

NGET'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.nationalgrid.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.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: [www.nationalgrid.com/network-and-assets/working-near-our-assets](http://www.nationalgrid.com/network-and-assets/working-near-our-assets)

#### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET'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](mailto:nationalgrid.uk@avisonyoung.com)

# Response 10

## Respondent Details

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

Q1. Are you completing this form as an:
Agent

## Your comments

<p>Q2. You can provide your comments on the Lewknor 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>We write to you with regards to the current consultations as detailed above in respect of our client, National Gas.</p> <p>Please find attached our letter of representation. Please do not hesitate to contact me via <a href="mailto:nationalgas.uk@avisonyoung.com">nationalgas.uk@avisonyoung.com</a> if you require any further information or clarification.</p> <p>Kind Regards</p> <p>[REDACTED] Graduate Planner +44 01912690052 Mobile +44 [REDACTED] [REDACTED]@avisonyoung.com   avisonyoung.com Central Square South, Orchard Street, 3rd Floor, Newcastle upon Tyne NE1 3AZ</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 02-06 Lewknor National Gas.pdf [REDACTED]</li></ul>

## 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.

<b>Title</b>	█
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Graduate Planner
<b>Organisation (if relevant)</b>	Avison Young
<b>Organisation representing (if relevant)</b>	National Gas
<b>Address line 1</b>	Central Square South
<b>Address line 2</b>	Orchard Street
<b>Address line 3</b>	3rd floor
<b>Postal town</b>	Newcastle-upon-Tyne
<b>Postcode</b>	NE1 3AZ
<b>Telephone number</b>	██████████
<b>Email address</b>	██████████@avisonyoung.com

Our Ref: MV/ 15B901605



02 June 2023

South Oxfordshire District Council  
[planning.policy@southoxfordshire.gov.uk](mailto:planning.policy@southoxfordshire.gov.uk)  
**via email only**

Dear Sir / Madam

**Lewknor Neighbourhood Plan - Regulation 16 Consultation  
April - June 2023  
Representations on behalf of National Gas Transmission**

National Gas Transmission 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 Gas Transmission**

National Gas Transmission 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.

**Proposed sites crossed or in close proximity to National Gas Transmission assets:**

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

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

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

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

**Distribution Networks**

Information regarding the gas distribution network is available by contacting:  
[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

**Further Advice**

Please remember to consult National Gas Transmission 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:



[REDACTED], Director

[nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

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

[REDACTED], Asset Protection Lead

[REDACTED]@nationalgas.com

National Gas Transmission  
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,

[REDACTED]

[REDACTED]

**Director**

**0191 269 0094**

[REDACTED]@avisonyoung.com

**For and on behalf of Avison Young**

National Gas Transmission 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.

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission'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 Gas Transmission 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 Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

#### How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission'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: [nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)



# Response 11

## Respondent Details

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

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Lewknor 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>Please find attached our response to the above consultation. Best wishes [REDACTED]</p> <p>[REDACTED] Historic Places Advisor , Historic England , London and South East Region</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: Historic England 7-6.pdf - [REDACTED]</li></ul>

## 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.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Historic Places Advisor
<b>Organisation (if relevant)</b>	Historic England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	4th floor, The Atrium
<b>Address line 2</b>	Cannon Bridge House
<b>Address line 3</b>	25 Dowgate Hill
<b>Postal town</b>	London
<b>Postcode</b>	EC4R 2YA
<b>Telephone number</b>	020 7973 3700
<b>Email address</b>	eastplanningpolicy@historicengland.org.uk

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

████████████████████



Historic England

By email only to: [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)

Our ref: [REDACTED]  
Your ref Lewknor Neighbourhood Plan

Main: 020 7973 3700  
[e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)  
[REDACTED]@historicengland.org.uk

Date: 08/06/2023

Dear Sir or Madam

### **Lewknor Neighbourhood Plan Regulation 16 Consultation**

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

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

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

Yours sincerely

[REDACTED]  
**Historic Places Advisor**



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 [HistoricEngland.org.uk](http://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.



# Response 12

## 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 Lewknor 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 Lewknor Final Submission Neighbourhood Plan. Email acknowledgment of this response would be greatly appreciated.</p> <p>Kind regards,</p> <p>[REDACTED] Planner Strategic Planning [REDACTED]@Oxfordshire.gov.uk</p> <p>Oxfordshire County Council, County Hall, New Road, Oxford, OX1 1ND <a href="https://www.oxfordshire.gov.uk/">https://www.oxfordshire.gov.uk/</a></p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: OXFORD~1.PDF - [REDACTED]</li></ul>

## 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.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Planner
<b>Organisation (if relevant)</b>	Oxfordshire County Council
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	County Hall
<b>Address line 2</b>	New Road
<b>Address line 3</b>	Oxford
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX1 1ND
<b>Telephone number</b>	██████████
<b>Email address</b>	██████████@Oxfordshire.gov.uk

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING  
CONSULTATION:**

**District:** South Oxfordshire

**Consultation:** Lewknor Neighbourhood Plan Final Submission (2023-2040)

**Annex 1 contains officer advice.**

---

**Overall View of Oxfordshire County Council**

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

**Officer's Name:** [REDACTED]

**Officer's Title:** Planner

**Date:** 07 June 2023

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**ANNEX 1**  
**OFFICER ADVICE**

**District:** South Oxfordshire District Council

**Consultation:** Lewknor Neighbourhood Plan 2023 – 2040 (Submission Document)

**Team:** Strategic Planning

**Date:** 30.05.23

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## **Strategic Comments**

Following the County's comments made to the Pre-Submission Draft in July 2020 there is only additional comments made by Transport to add to this Neighbourhood Plan Final Submission responding to the Parking and Sustainable Transport section 16.1 on page 69 of the Neighbourhood Plan.

The amendment requested by archaeology in our pre-submission comments has been taken forward which is welcomed.



**District:** South Oxfordshire District Council

**Consultation:** Lewknor Neighbourhood Plan 2023 – 2040 (Submission Document)

**Team:** South and Vale Locality

**Officer's Name:** [REDACTED]

**Officer's Title:** Transport Planner

**Date:** 26.05.23

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## **Transport Comments**

Point 16.1 Parking and Sustainable Transport, page 69

**OCC response:** Whilst informal, Lewknor Interchange is an important location in Oxfordshire's public transport network and offers convenient connections for Oxford, London and the Airports which helps to reduce the need to drive longer distances. There are no current plans to increase the level of parking, however there have been proposals to improve the active travel links between the parking areas and bus stops, and in addition the location may be considered as one of a new series of transport hubs in the future. Informal parking at Lewknor will continue to take place and the safety of all road users in the vicinity is of paramount importance.

The village, and the area more widely, benefits significantly from these public transport connections and it would be disappointing if lack of commercial viability arising from difficult parking arrangements were to affect this facility in the future. Any formal proposals, either from the Council or third parties, will be consulted on with the parish council in the usual manner.

**District:** South Oxfordshire District Council

**Consultation:** Lewknor Neighbourhood Plan 2023 – 2040 (Submission Document)

**Team:** Archaeology

**Officer's Name:** [REDACTED]

**Officer's Title:** Lead Archaeologist

**Date:** 22.05.23

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## **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.

# Response 13

## Respondent Details

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

Q1. Are you completing this form as an:
Agent

## Your comments

Q2. You can provide your comments on the Lewknor 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>To whom it may concern,</p> <p>Please find attached representations on the Lewknor Neighbourhood Plan on behalf of our client Reinier Developments Ltd.</p> <p>We would be grateful for confirmation that these representations have been received.</p> <p>Kind regards</p> <p>[REDACTED]</p> <p>Director</p> <p>Turley</p> <p>Mobile: +44 [REDACTED]</p> <p>Office: 0118 902 2830</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: Lewknor - NP reps obo Rainier.pdf [REDACTED]</li></ul>

## 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.

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	Director
<b>Organisation (if relevant)</b>	Turley
<b>Organisation representing (if relevant)</b>	Rainer Developments Ltd
<b>Address line 1</b>	The Pinnacle
<b>Address line 2</b>	20 Tudor Road
<b>Address line 3</b>	Reading
<b>Postal town</b>	Reading
<b>Postcode</b>	RG1 1NH
<b>Telephone number</b>	0118 902 2830
<b>Email address</b>	[REDACTED]@turley.co.uk

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

[REDACTED]

7 June 2023

Delivered by email (planning.policy@southandvale.gov.uk)

Planning Policy  
South Oxfordshire District Council  
Abbey House  
Abbey Close  
Abingdon  
OX14 3JE

Ref: [REDACTED]

Dear Sir / Madam

## **LEWKNOR NEIGHBOURHOOD PLAN – REPRESENTATIONS ON BEHALF OF RAINIER DEVELOPMENTS LTD**

We write on behalf of our client, Rainier Developments Ltd ('Rainier') to submit representations on the Lewknor Neighbourhood Plan.

As the Council will be aware, Rainier are promoting land south of Watlington Road, Lewknor for residential development. This site has been promoted to the District Council's Call for Land and Buildings Available for Change in 2021.

The Site was subject to a previous Outline Planning Application LPA ref: P17/S37110/O for up to 40 homes which was refused by South Oxfordshire District Council Planning Committee and the subsequent appeal, reference APP/Q3115/W/18/3200335, was dismissed. Notwithstanding the outcome of the appeal for up to 40 homes, the following matters from the Appeal Decision should be noted:

- There would be no harm to the AONB from the appeal scheme (paragraph 38).
- The Site does not form part of a valued landscape (paragraphs 40 and 42).
- The Site is a satisfactory location for housing in terms of access to shops and services other than by means of private car (paragraphs 57 and 58).

Rainier note that this Site lies adjacent to the settlement boundaries of Lewknor as shown in map 2 of the draft Neighbourhood Plan and consider that it provides a logical and sustainable opportunity to accommodate new homes, including affordable housing at the village.

Whilst Rainier recognise that this draft Neighbourhood Plan does not propose specific site allocations, Rainier would be willing to engage with the District Council, Parish Council and other stakeholders.

The Pinnacle  
20 Tudor Road  
Reading  
RG1 1NH

T 0118 902 2830 turley.co.uk

We make a minor comment that points i and ii of Policy DC1 should be consistent. Currently point i requires that development proposals implement the best practices set out in the Chilterns Buildings Design Guide and the South Oxfordshire District Council Design Guide. Point ii requires that “where a Design and Access Statement is required and the development is in the Chilterns Area of Outstanding Natural Beauty or its environs it should explain how it complies with the Chilterns Buildings Design Guide and the South Oxfordshire District Council Design Guide.” The first point should be amended to requires the implementation of the best practices set out in the Chilterns Buildings Design Guide where the proposals are within the AONB. Alternatively, the first point could be deleted as point ii appears to serve the same intended purpose.

Rainier look forward to engaging with all parties as both the Neighbourhood Plan and Local Plan progress.

Yours sincerely

████████████████████

**Director**

████████████████████@turley.co.uk

**The following responses were received after the Regulation 16 consultation period had ended.**

# Response 14

## Respondent Details

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

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Lewknor 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>Dear Policy</p> <p>Please find attached two responses to the Lewknor NP consultation.</p> <p>I'm sorry for the delay.</p> <p>[REDACTED]</p> <p>Planning Specialist Team Leader Planning Service</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: urban development comments.pdf - [REDACTED]</li></ul>

## 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.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Planning Specialist Team Leader
<b>Organisation (if relevant)</b>	Planning Service
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Abbey House
<b>Address line 2</b>	Abbey Close
<b>Address line 3</b>	Abingdon
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX14 3JE
<b>Telephone number</b>	01235 422600
<b>Email address</b>	██████████@southandvale.gov.uk

## Planning



## Urban Design comments

**To:** [REDACTED]

**From:** [REDACTED]

**Date:** 24/05/2023

**Site:** Lewknor

**Application:** P23/S1653/SPC

**Proposal:** Neighbourhood Plan

---

### Relevant legislation, planning guidance, policies, and SPDs:

- [National Planning Policy Framework \(NPPF\)](#)
- [National Planning Practice Guidance \(NPPG\)](#)
- [South Oxfordshire Local Plan 2035](#)
- [National Design Guide](#)
- [National Design Code: Part 1 \(Coding Process\)](#)
- [National Design Code: Part 2 \(Guidance notes\)](#)
- [South Oxfordshire and Vale of White Horse Joint Design Guide](#)

A proposal and its design must comply with the relevant policies set out in the NPPF, the development policies of the South Oxfordshire Local Plan, and the Joint Design guide. The Joint design guide is an SPD and a material consideration in determining planning applications submitted to the Council. Note: The National Design guide is for reference only and does not supersede the Joint Design Guide.

## Overview:

Comments following a reading of submitted documents for P23/S1653/SPC.

## Comments:

Below are the relevant design policies from the Lewknor Neighbourhood plan along with comments or recommended amendments.

Additional (or revised) wording is highlighted in **yellow**; strikethrough wording should be removed (or developed further).

### DC1: Character of Developments

I would recommend amending item i. to emphasize the Local Authorities Joint Design Guide and meeting its principles as these are supplementary to the Local Plan.

- i. Follow design practices as set out in South Oxfordshire District Council's Joint Design Guide, development must also have consideration for the Chilterns Buildings Design Guide when it is in the Chilterns Area of Outstanding Natural Beauty.
- ii. where a Design and Access Statement is required, and the development is in the Chilterns Area of Outstanding Natural Beauty, ~~or its environs~~ ensure it explains how it complies with relevant principles from both South Oxfordshire District Council's Joint Design Guide and the Chilterns Buildings Design Guide.

The district authorities' Joint Design Guide (JDG) is supplementary to the adopted Local Plan and is considered to carry more weight as a material consideration when assessing the design of any development, this does not exclude or supersede the Chilterns Buildings Design Guide, but I would expect the emphasis to be placed on meeting the design principles of the JDG due to it being supplementary to the Local Plan.

- iii. the density, scale and arrangement of buildings should reflect that of the development context. ~~respective settlement area.~~

Reword for clarity.

- iv. ~~where building(s) on one side of a road are close to the roadside, any building(s) on the opposite side of the road should be set well back from the roadside in order to maintain a sense of openness~~

I would recommend removing item 3, as this would be considered on a case-by-case basis, in addition, the character of the existing street and the setback of its building line would be informed of any existing pattern of frontage.

- v preserve historic plot boundaries, hedgerows and enclosure walls.

No comment

## DC2: Design Principles

I have some concerns and recommend amending these policies.

- i. provision of a high-quality design

No comment

- ii. Have regard to how their landscape schemes, **site** layout, access and public open space provision and other amenity requirements may contribute to the maintenance and improvement of the surrounding area.

Introduce the word 'site' for site layout so as not to confuse or limit the internal layout of buildings.

- iii. Existing arboricultural features should be incorporated into design schemes wherever possible so that they are set off as an attractive asset to the development.

No comment

- iv. boundary treatments to highways and village lanes **or frontages** should comprise ~~native hedgerow, or stone, brick or flint boundary walls~~ as boundary treatments appropriate to the immediate context **and character** of the site.

The design response of boundary treatments must respond to an existing context, the policy is unnecessarily descriptive.

- ~~v. boundary treatments to the front of properties should be soft (lawn, low hedges, trees, planting) and/or low stone/brick walls/picket fencing~~

Similarly, to point iii, the design response of frontages must respond to an existing context, the policy is unnecessarily descriptive and with rewording to point iii, can be removed.

- vi. ~~proposed lighting should conserve and enhance relative tranquillity, concerning light pollution and dark night skies, and comply with other relevant policies. All new lighting should demonstrate that it meets or exceeds the Institute of Lighting Professionals guidance and other relevant standards or guidance (CIE 150:2017 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations) for lighting within environmental zones, and have regard to the following hierarchy:~~
- ~~a) The installation of outside lighting is avoided~~
  - ~~b) If lighting is installed it is necessary for its intended purpose or uses and any adverse impacts are avoided, and~~
  - ~~c) If it is demonstrated that (a) or (b) is not achievable, then adverse impacts are appropriately mitigated~~

Too many technical factors and constraints would affect the implementation and measurement of new lighting about policy point v. for it to be implemented.

- vii. ~~proposed lighting for development proposals should ensure all of the following:~~
- ~~a) The measured and observed sky quality in the surrounding area is not reduced~~
  - ~~b) Lighting is not unnecessarily visible in nearby designated and key habitats~~
  - ~~c) The visibility of lighting from the surrounding landscape is avoided~~
  - ~~d) Building design that results in increased light spill from internal lighting is avoided unless suitable mitigation measures are implemented~~

Similarly, too many technical factors and constraints that would affect the implementation and measurement of new lighting about policy point vi. for it to be implemented. In addition, the policy is too restrictive.

- viii. ~~proposed parking arrangements for residents and their visitors incorporate solutions that avoid large expanses of communal parking or the loss of vegetation along the roadsides and do not necessitate parking on village lanes and have a minimal impact on the street scene. All new residential developments must conform to Oxfordshire County Council's parking standards.~~

The wording here is too vague, I would develop its wording or refer to OCC Parking standards and Street Design guide along with the JDG.

- ix. ~~unless impracticable,~~ garages must be built in direct association with the houses whose inhabitants may be expected to use them. They must be spacious enough to accommodate modern cars and bicycles **as set out in Oxfordshire County Council's parking standards** ~~Proposals for separate parking areas would not be~~

~~permitted unless alternative provision is impracticable. In such instances they should be small, discreet and located out of view of the road~~

The following amendments simplify the policy and make it clearer.

- x. provision must be made for adequate storage space for bins and this should not detract from the street scene

No comment

- ~~xi. any new road is in keeping with the form of existing roads and lanes within its village~~

Highways design is a matter for the County council.

- xii. roads and footpaths must not feature street and/or path lighting unless it is a requirement of a statutory body, ~~in which case it should use optimal green solutions~~

The term 'green solution' is not defined and is too obscure.

- xiii. It should avoid the installation of kerbs to new or existing village lanes or roads but where this is not possible the use of more sympathetic materials/construction design, as identified on pages 18 and 19 of Oxfordshire County Council's 'Residential Road Design Guide' should be used in preference to the installation of precast concrete kerbs. New development should not have a detrimental impact on the local highways network, unless mitigated appropriately, ~~especially with regard to the rural country lanes which are unsuitable for high volumes of traffic or large vehicles~~

The suitability and capacity of the highways network, including country lanes are to be determined by Oxfordshire County Council, the last statement in the policy assumes all country lanes are unsuitable for high volumes of traffic.

### **DC3: Sustainable Design**

I have no comments or concerns about the policies set out under DC3.

**Conclusion:**

I could support this neighbourhood plan if the policy wording for design is refined or amended as above.

Please let me know if you want to discuss this scheme or my comments.



**Senior Urban Design Officer**

South Oxfordshire and Vale of White Horse District Councils