

Binfield Heath Neighbourhood Plan - publicity period

Response 1

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2023-12-08 10:05:42

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Roger Murray-Leach

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The Binfield Heath Neighbourhood Plan strikes me as a relevant, well-considered, thoughtful document; devoid of Nimbyism while at the same time seeking to retain the 'atmosphere' that makes Binfield Heath such a pleasant and interesting place to live, with a nod towards the history of the area, and I would very much hope that it is formally adopted.

Inevitably I would guess there will be objections (self interest?) but the document seems to me to be well balanced and accepting of change, while seeking to encourage sympathy for what exists and a regard for the environment.

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

Public hearing

6 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.

I don't know

Finally...

14 How did you find out about the Binfield Heath Neighbourhood Plan consultation? Please tick all that apply.

Response 2

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-13 15:02:07

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr & Mrs

Name:

Nigel & Kathryn Piercey

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

[REDACTED]

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED] or [REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We commend [REDACTED] and the whole BHNP Steering Group on the production of this comprehensive NP, and particularly on their efforts to engage the whole community in the formulation of it. It has been impossible to ignore the invitation to contribute to the gestation of the plan, and review its evolution.

A minor input we made into the substance of the plan was acknowledged, considered and included.

We also note the positive contribution of SODC, for which we are grateful.

We welcome the inclusion of our house as a NDHA, and would be happy to abide by the conditions attached thereto.

We wholeheartedly support the current Examination version of the plan, and would vote for its adoption in a referendum should it proceed to that stage.

Thank you for the opportunity to comment.

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

[REDACTED]

Public hearing

6 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.

No, I do not request a public hearing

Finally...

14 How did you find out about the Binfield Heath Neighbourhood Plan consultation? Please tick all that apply.

[REDACTED]

Response 3

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-23 16:18:47

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Planning Policy Officer (Neighbourhood)

Organisation (if relevant):

Organisation representing (if relevant):

South Oxfordshire District Council

Address line 1:

Abbey House

Address line 2:

Abbey Close

Address line 3:

Abindgon

Postal town:

Oxford

Post code:

OX14 3JE

Telephone number:

Email:

██████████@southandvale.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

South Oxfordshire District Council has worked to support Binfield Heath Parish Council in the preparation of their Neighbourhood Plan and compliments them on a thoughtful, comprehensive and well-produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the Binfield Heath Neighbourhood Development Plan (NDP) during the pre-submission consultation.

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

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

You can upload supporting evidence here:

Binfield Heath DC Comments.pdf was uploaded

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

████████████████████

Public hearing

6 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.

No, I do not request a public hearing

Finally...

14 How did you find out about the Binfield Heath Neighbourhood Plan consultation? Please tick all that apply.

████████████████████

Policy and Programmes
HEAD OF SERVICE: TIM ORUYE



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

22 January 2024

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

South Oxfordshire District Council has worked to support Binfield Heath Parish Council in the preparation of their Neighbourhood Plan and compliments them on a thoughtful, comprehensive and well-produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the Binfield Heath Neighbourhood Development Plan (NDP) during the pre-submission consultation.

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

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

Yours faithfully

[REDACTED]

[REDACTED]

Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
Neighbourhood Plan Comments - Where changes to policy of supporting text are recommended new text is shown in bold and deleted text is shown as strikethrough .		
1	General Comment	<p>The NPPF was updated on December 20th 2023. This has resulted in several changes, including to the sections and page numbers referenced throughout this document and the supporting appendices. The references within the Neighbourhood Plan and the appendices should be updated to reflect the updated NPPF. The latest version of the NPPF can be found here:</p> <p>https://www.gov.uk/government/publications/national-planning-policy-framework--2</p>
2	General comment	<p>On Wednesday 22nd November 2023 all designated Areas of Outstanding Natural Beauty (AONBs) in England and Wales became National Landscapes. The new name reflects their national importance; the vital contribution they make to protect the nation from the threats of climate change, nature depletion and the wellbeing crisis, whilst also creating greater understanding and awareness for the work that they do. We recommend that the references to AONBs throughout the plan are amended to National Landscapes to reflect the change.</p>
3	3.3 Monitoring and Review Policy – Page 39	<p>We understand the second paragraph on page 39 is detailing how the plan will be monitored and updated when necessary, however as it is currently written it does not provide flexibility to deviate from the approach. We therefore suggest replacing this paragraph with:</p> <p>‘The Parish Council will be responsible for monitoring and periodically revising/updating the plan to ensure effective. The intention is to monitor the Plan on a yearly basis, and to review/update the plan as necessary.’</p>
4	Community Spirit – Page 43	<p>Our Equalities team have provided the following comment: Aim, to build on the parish’s strong sense of community and identity. In the objectives CS4 mentions retain and support the recreation grounds, allotments, and other community spaces. There is no mention of accessibility to all, raised beds in the allotment and ensuring they will have accessible play equipment, accessible picnic benches etc, unless of course these are currently in place in which case it would be nice to have read this and that it will continue.</p>

Ref.	Section/Policy	Comment/Recommendation
5	5.3.1 Sustainable Development and Climate Change – Page 48	<p>We note there is not a policy in this section. South Oxfordshire has set a target to be a net zero district by 2030. This section of the plan sets out a clear ambition (this ambition is also aligned to the district council’s ambition) however the NDP does not have an effective mechanism to help achieve this ambition through a policy. To provide sufficient clarity within the plan to achieve this ambition we would highlight to the examiner there are a number of NDPs in the district already helping to achieve this ambition. We are therefore of the opinion that there is an opportunity to help meet this target with the inclusion of a policy. We therefore recommend the following policy wording to be included in the section:</p> <p>Zero carbon buildings</p> <p>Development proposals which would be ‘zero carbon ready’ by design by minimising the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping will be supported. Consideration should be given to resource efficiency at the outset and whether existing buildings can be re-used as part of the scheme to capture their embodied carbon.</p> <p>Proposals for a Passivhaus or equivalent standard buildings with a space heating demand of less than 15KWh/m2/year will be supported. Schemes that maximise their potential to meet this standard by proposing the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located will be supported, provided it can be demonstrated that the scheme will not have an unacceptable effect on the character area.</p> <p>Proposals for major development should be accompanied by a Whole-Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions have been taken to reduce embodied carbon resulting from the construction and use of the building over its life.</p>
6	PLCA 3 – PLCA 7 – Pages 57-62	<p>Our Equalities team have provided the following comment: the plan says to avoid road improvements such as pavements, street lighting and signage. It is</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>however important to consider the safety of people in wheelchairs/people who use walking aids, and people with visual impairment. We understand the importance of 'dark skies' however, potholes and uneven roads, overgrown vegetation can be a hazard for many people and not everyone has good night vision.</p> <p>We therefore recommend the sections on roads and paths relating to PLCA3-7 are reconfigured to focus on seeking innovative design solutions to preserve the character of the area where road improvements are required, taking into account accessibility for all.</p>
7	Policy BH1 – Landscape Character and Value – Page 62	<p>As the National Landscape (formally known as AONB) does not fully cover the parish, we therefore recommend the addition of 'where relevant' is added to the bullet points 2 and 4 so the policy can be applied when appropriate:</p> <p><i>'Where relevant, maintain the role the PLCAs play in enhancing the character and special qualities of the AONB National Landscape and its setting'</i></p> <p><i>'Where relevant, reflect the features that define the character of the wider landscape which is sited either within the Chilterns AONB National Landscape or its setting.'</i></p> <p>The text within brackets that follows 'setting' reads as supporting text and not policy wording and may be better included as an supporting text or as a footnote.</p> <p>The final bullet point includes 'as shown in this plan' with no reference to the relevant sections supporting this information. For consistency with the other policies within the NDP and to avoid confusion to the reader we recommend that this is removed from the policy.</p>
8	Policy BH2 – Setting of Settlements and Coalescence – Page 67	<p>We would like to highlight from our experience with similar policies in other neighbourhood plans examiners have indicated that settlement gaps need to be the smallest area necessary, to prevent coalescence.</p> <p>The examiner for the Brightwell-cum-Sotwell plan noted in their report that 'As part of the process of</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>identifying local gaps, the policy identifies the minimum areas that are required', and therefore was satisfied with the local gaps identified.</p> <p>As highlighted in our pre submission consultation response we consider changes are necessary to refine the gaps identified so they cover a smaller area of land.</p> <p>Our development management team have raised concerns about requiring an Landscape and Visual Impact Assessment (LVIA) for any development. They advise this should be determined on a case by case basis and proportionate to the location, scale and type of the development. To address this issue we therefore recommend 'where appropriate' is placed before 'should be accompanied'</p> <p>As highlighted in comment 1 There is a new version of the NPPF. The current policy includes reference to paragraph 84, however this is now 88. Additionally we also recommend the inclusion of a reference to the new paragraph 84 which deals with the new provision of homes in the countryside. We therefore propose that reference to both paragraphs 84 and 88 is made in the following section of the policy: 'Proposals for appropriate rural development within the settlement gaps identified in Figure 36, as defined by paragraph 84 and 88 of the NPPF, should be non-intrusive and preserve the physical and visual separation between settlements.'</p>
9	Policy BH5 – Important Views – Page 78	<p>The view triangles for important views 9, 10, 11, 25, 29, and 30 appear to extend over, or originate from, land outside of the neighbourhood plan boundary. Neighbourhood plan policies can only apply within the plan area, therefore views and areas outside of the neighbourhood area will not be subject to policies and should be amended or deleted. Views 6, 7, and 17 are also very small and difficult to identify on this map. We recommend the addition of an insert which shows these in greater detail.</p> <p>A section explaining why each view is important and requires protection, ideally with a photograph of the view attached, should be provided in the supporting text for this policy, or within an appendix to the plan. We note that there are views listed in the Landscape Character Assessment document, but these do not</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>appear to be wholly consistent with the views chosen for this policy. It is important that to know why each of the views have been determined as worth protecting. Please see page 35 of the Berrick Salome Neighbourhood Plan as an example of this.</p> <p>The final part of the policy states: <i>‘Development proposals within the parish which would have an adverse impact on an identified Important View will not be supported.’</i> We recommend replacing ‘an adverse impact’ with ‘a significant impact’ to ensure the policy is not overly restrictive and unduly onerous.</p>
10	Policy BH6 – Non-Designated Heritage Assets – Page 82	As per comment 1 the NPPF reference needs to be updated.
11	Policy BH7- Design Code- Page 87	<p>The NPPF (Para 139a) states that development proposals should reflect ‘local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.’</p> <p>The first part of the policy is aligned with the NPPF and requires development to take account of the design code produced whereas the final paragraph requires that development requires accordance with each matter set out in the Design Code as appropriate.</p> <p>Both parts of the policy deal with how development proposals should respond to the Design Guidance and Code but do so in a conflicting manner.</p> <p>We consider the requirement for development to account of the design code is appropriate and fully aligned with national policy and guidance. We therefore recommend the final section of the policy is amended to be consistent with first part of the policy.</p> <p>We also recommend this policy makes reference to the district council’s Joint Design Guide.</p>
12	Policy BH9- Development and Redevelopment including Backland and Infill- Page 92	<p>The below bullet point needs to be removed and should be a separate paragraph to the bullet points.</p> <ul style="list-style-type: none"> • <i>The areas outside those defined on Figure 50 are considered to be open countryside</i>

Ref.	Section/Policy	Comment/Recommendation
		<p>For the reasons set out in comment 11 we recommend the first bullet point in the final list of Policy BH9 is amended as follows:</p> <p>'The proposal is in accordance with and respects the local character of the area, as highlighted in the taking account of the district council's Joint Design Guide and the Design Code for each settlement.'</p>
13	Policy BH10- Dwelling Extensions- Page 95	<p>For reasons set out in comment 11 and to ensure the relationship of this policy with the policies in the local plan is clear we recommend the first part of the policy is amended to:</p> <p>'Development proposals for residential extensions will be supported where they comply with the relevant policies in the development plan and take account of the district council's Joint Design Guide and the Binfield Heath Design Code.</p> <p>We also recommend the bullet points are removed.</p>
14	Policy BH11- Replacement Dwellings- Page 97	<p>To ensure the relationship of this policy with the policies in the local plan is clear we recommend the first part of the policy is amended to:</p> <p><i>'Proposals for the replacement of a dwelling will be supported where they comply with the relevant policies in the development plan and meet the following conditions:'</i></p> <p>For reasons set out in comment 11 we recommend the first bullet point of the policy is amended to:</p> <p><i>'The replacement dwelling will be in keeping with the character of the area as highlighted and take account of the district council's Joint Design Guide and the Binfield Heath Design Guidance and Codes.'</i></p>

Ref.	Section/Policy	Comment/Recommendation
15	Policy BH12 – Community Assets and Economy – Page 99	<p>The policy as currently worded contains references to ‘Community Asset’ we recommend this terminology is amended to ‘community facility’ to ensure consistency throughout the policy and to avoid any potential confusion with Assets of Community Value.</p> <p>The third bullet point on page 100 states that the policy requires the submission of a viability report providing financial evidence of the last 12 months to accompany an application. In order to align with the adopted local plan and to provide an appropriate degree of flexibility we recommend information of what should be included within an application should be moved to supporting text.</p> <p>The policy as currently written falls under two topics community facilities and the economy. To ensure the policy can be applied with clarity and consistency we recommend the policy is split into two individual policies. We therefore recommend the final paragraph is made into a separate policy BH12b- Economy and the remaining sections are reconfigured into policy BH12a.</p>
16	Policy BH14 – Flooding and drainage – Page 106	<p>Our climate team is very supportive of how the plan has demonstrated clear regard for the climate and ecological emergencies. Policy BH14 – flooding and drainage is particularly welcomed. However, our development management team have commented that the flood risk mitigation for development needs to be proportionate to the scale and type of development. Development management officers are guided by the council’s Drainage team for any flood risk mitigation requirements and details. They consider it would be too onerous and unreasonable to deal with these matters for every development. To address this we recommend the policy is amended to require mitigation measures to be relevant to the nature scale and location of the development.</p>
17	Policy BH15- Trees and Woodland - Page 108	<p>The first sentence on this page, starting ‘New development should incorporate existing native trees and shrubs’ reads as if it is intended to be part of a policy and we consider it would be appropriate for it to be so. Text included outside of a policy box does not hold the same weight when considering a development proposal as that within one. If the intention is for this text to be used when determining a planning application, it should be placed within</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Policy BH15.</p> <p>Within the policy it also includes text which reads more as supporting text <i>'The parish is characterised by its woodland setting which could be damaged either individually or cumulatively by inappropriate tree loss.'</i> We therefore recommend this text is removed from the policy and put in supporting text.</p> <p>Paragraph 186 of the NPPF 2023 states: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons* and a suitable compensation strategy exists; and</p> <p>* For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.</p> <p>The policy as worded does not reflect the flexibility as found in national policy we would therefore advise that the policy is amended to:</p> <p>'Development proposals should incorporate existing native trees and shrubs where possible and should avoid unnecessary loss of flora. Any trees or woodland lost to new development should be replaced in line with the Woodland Trust Guidance.</p> <p>Development proposals should seek to ensure no loss or significant harm is caused to sites of biodiversity value with attention to any effect on those areas of ancient woodland as detailed in figure 55 and listed below:</p> <ol style="list-style-type: none"> 1. Crowsley Park Woods 2. Summerhouse Woods (Bones Wood – AW) 3. Morgan's Wood (AW) 4. Woods opposite Coppid Hall 5. Long Covert/ Wild Orchard (AW)

Ref.	Section/Policy	Comment/Recommendation
		<p>6. The Belt</p> <p>7. The Common</p> <p>8. King’s Common</p> <p>9. Shiplake Copse (Bluebell Woods) (AW)</p> <p>10. Radbrook’s Copse (AW)</p> <p>11. Woods South of Holmwood</p> <p>12. Woodwax Wood (AW)</p> <p>13. Long Copse (AW)</p> <p>14. Shiplake Woods</p> <p>15. Upper and Lower Hailey Wood (AW)</p> <p>16. Oakhouse Wood (AW)</p> <p>17. Fir Grove</p> <p>18. NW of Long Copse (AW)</p> <p>19. Copse in Arch Hill opposite the recreation ground</p> <p>*(AW) denotes part or full areas of Ancient Woodland</p> <p>Our development management team have highlighted that tree surveys may not be required for every application. These circumstances for where tree surveys are required are set out in the district councils Validation Guidance document. We therefore recommend the second paragraph of the policy is replaced with:</p> <p>As appropriate to their scale, nature and location development proposals should be supported by adequate tree survey information. Sites must be surveyed in accordance with the British Standard guidance 5837 and future development should be designed to reflect the tree constraints identified.’</p>
18	Policy BH16- Biodiversity – Page 112	As Neighbourhood Plans cannot include policy demands outside of the plan area, we recommend that the paragraph starting ‘Existing wildlife corridors...’ is reworded to avoid confusion:

Ref.	Section/Policy	Comment/Recommendation
		<i>'New wildlife corridors that connect to existing corridors in adjacent Neighbourhood Plans should be extended where appropriate neighbouring parishes bordering the plan area will be supported.'</i>
19	Policy BH16- Biodiversity – Page 112	<p>We welcome the ambition to raise the target for biodiversity net gain. However, our development management team have highlighted it is not realistic to expect this from all planning applications.</p> <p>Our emerging JLP is seeking to achieve at least 11-25% biodiversity net gain (whatever is the maximum assessed as deliverable through the Joint Local Plan Viability Assessment). Our emerging policies acknowledge that exemptions will be set out in forthcoming regulations and are expected to include development impacting habitat of an area below a 'de minimis' threshold of 25 metres squared (or 5m for linear habitats such as hedgerows), householder development, biodiversity gain sites (where habitats are being enhanced for wildlife), and small-scale self-build and custom housebuilding.</p> <p>We therefore recommend policy is reworded as follows:</p> <p>'Development proposals should achieve a biodiversity net gain of 20% where appropriate and no less than the 10% minimum required level'</p>

Design Code Comments		
1	General comment	<p>The NPPF was updated on December 20th 2023. This has resulted in several changes, including to the sections and page numbers referenced throughout this document and the supporting appendices. The references within the Neighbourhood Plan and the appendices should be updated to reflect the updated NPPF. The latest version of the NPPF can be found here:</p> <p>https://www.gov.uk/government/publications/national-planning-policy-framework--2</p>

Response 4

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-25 17:39:00

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Ruth Piercy

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Examiner,

As a resident of the village, I am broadly very encouraging of a neighbourhood plan that supports our status as a smaller village without excessive and poor quality development and that retains the historic character of the village where possible. My main comments, however, focus on a few areas of the plan which I think are either slightly over-zealous, contradictory or bear greater scrutiny, namely:

Section 2.8.1 Getting around: suggests that there could be additional footpaths to link up sections of the village and while in theory I support the idea, I think it extremely presumptuous to suggest that someone should allow new public access across their private land. Unless volunteered, I feel this is not appropriate to include in the wording of the Plan. For clarity, this would not affect my land.

Sections 2.8.4 Speeding and 2.8.5 Parking: contradict each other, in particular regarding Arch Hill. I agree that speeding is a problem; we live at the bottom of this stretch of road and regularly experience people entering the village at excessive speed where there is both a junction and an entrance to the recreation ground at the corner with Common Lane. I don't support speed humps or any measure that would lead to people over-revving their cars or unnecessarily accelerating up the hill and leaving traffic fumes in a natural low part of the terrain where it would sit and affect immediate houses' air quality. But the parking further up the hill doesn't really help the users of the playground because it (the rec.) sits below that stretch of road and so people speed past the recreation ground before they reach the parked cars. There is also then a comment in section 2.8.5 that there is a concern about parking, so we can't expect to have it both ways and this seems contradictory to me. [REDACTED]

[REDACTED], the road is often blocked with vans and cars that are difficult to see around or navigate for both cars and

pedestrians, before reaching the start of the pavement. We should not encourage that parking for the purpose of traffic calming as it creates a danger near another busy junction and bus stops. There is also regularly a car(s) parked at the lower end of Arch Hill from a house that has too many cars for their house and driveway or who choose not to use their driveway - these residents were part of the Plan's steering group so this might be a subjective input to the Plan that should be removed on that basis. They park at the narrowest part of the road and the large vehicles using that route (locally from Southern Plant and from the building yards in Sonning or Pepperd) or indeed fire engines, struggle to get past and the verge and footpath opposite have recently, therefore, become very eroded as a result of this inappropriate parking. Therefore again, the use of cars to calm the traffic is not appropriate on a narrow stretch of road. I would suggest these two clauses need a bit of work and perhaps would be better off suggesting that any development requires new housing or extensions to provide for two cars (the Plan suggests 45% of households have (need for) two (or more) cars in the village, in part due to the dwindling bus service) and ideally a guest. I.e. new builds or major renovations should provide for 2-3 cars, extensions should not eat in to driveway space that should clearly be used for parking cars and keeping the highway clear and improve safe sight lines for pedestrians, cars and other road users.

2.4 Dark skies - whilst I very much support retaining our dark skies in the village, there are households already in the village who have sometimes obnoxiously bright lights to either their main dwelling or outbuildings (whether or not permanent) that cause offence to neighbours and affect the abundant nature we see in the village. I don't know if the plan could extend to guidance on what kind of external lighting is appropriate here e.g. no flood lighting or extremely bright lights that impact on surrounding houses, even with curtains closed, which we have experienced.

4.3.2 Built Environment. I support very much BE1 and BE4 when it comes to respecting the rural and village character but the 'heritage assets' lists mentioned in BE5 and listed in Appendix D concerns me and I believe may be overzealous or perhaps, rather, lacks detail in the sense of what they propose to protect. These are, as it states, not listed properties and I believe some, whilst perhaps in more prominent areas of the village, are not of any particular historical or even aesthetic interest. E.g. Three-a-leet, whilst in a prominent area and having characteristics of historical note such as the sea level measure, it otherwise lacks any sort of architectural interest; no interesting brickwork around the windows, a very unsightly porch and side conservatory which, instead of being protected, actually would be better off being removed and sympathetically and tastefully replaced or improved, in keeping with the local heritage style of the village. Our houses at Arch Cottages again, less for being a 'set' are of no real interest. The justification for addition to the list is poor and undermines the importance of the list. It states: "Three Victorian cottages, each originally two / three homes." (This is not a proper justification) and "Simple brick and render construction, slate roofs. Typical porches." (Again of no architectural interest of history and I say that as the daughter of an Architect). There are some lovely details internally such as original hearths and beams but I'm not sure this plan could protect them anyway. Externally, they are just painted brick or render and all are in need up updating, both aesthetically in some cases and also to meet a better environmental standard, remove signs of damp etc.. My real concern is that by adding such houses of little interest to Appendix D, they are inhibiting the genuine need for improvement of these buildings. I think the Plan needs to include more information regarding the extent to which we would protect these buildings e.g. what is of genuine interest and why, front elevation only etc. Heathfield House is another house which has no interest or features particularly typical of the area and there is no real justification for including it on the list. They are not listed assets and I think we need to be careful of allowing too much control in the hands of the Parish Council and planners when it comes to assets that are not included in the English Heritage register. We should treat some of these fairly 'ordinary' houses (of which I include my own) as any other building in the village that should be renovated or extended sympathetically, to a good quality and in line with local character.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Remove certain properties from Appendix D which are of no aesthetic, historical or architectural interest or quality

Re-think the parking verses speeding argument laid out in the plan. We should not encourage further parking on the road as a means of traffic calming. It is dangerous to many road users and villagers as they are not clear lines of sight.

You can upload supporting evidence here:

No file uploaded

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

[REDACTED]

Public hearing

6 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.

I don't know

Finally...

14 How did you find out about the Binfield Heath Neighbourhood Plan consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 5

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-26 10:55:22

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Thames Water

Address line 1:

1st Floor West

Address line 2:

Clearwater Court

Address line 3:

Vastern Road

Postal town:

Reading

Post code:

RG1 8DB

Telephone number:

[REDACTED]

Email:

[REDACTED]@thameswater.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

[REDACTED]

[REDACTED]

Property Town Planner

[REDACTED]

[REDACTED]@thameswater.co.uk

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

You can upload supporting evidence here:

23.12.15 Binfield Heath NP issued.pdf was uploaded

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

████████████████████

Public hearing

6 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.

I don't know



E: [REDACTED]@thamewater.co.uk
M: +44 (0) 7747 647031

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

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

15 December 2023

South Oxfordshire District – Binfield Heath Neighbourhood Plan 2011-2035 Examination Issue, October 2023

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 BH14 – Flooding and Drainage

We support the policy in relation to SuDS, but consider that drainage and sewerage/wastewater infrastructure should be covered in a separate policy.

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

Flood risk sustainability objectives should 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.”***

For any proposals connecting into the Thames Water network, capacity in the network will need to be verified. This can be done via Thames Water’s free pre planning service, which will confirm if capacity exists and what we’ll do if it doesn’t.

Policy Omission - Water Supply and Wastewater/Sewerage Infrastructure

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.”

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

Development Sites

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

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

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

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

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

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

Yours faithfully,

[REDACTED]
Thames Water Property Town Planner

Response 7

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-26 14:36:47

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Business Officer, London and South East Region

Organisation (if relevant):

Historic England

Organisation representing (if relevant):

Address line 1:

4th Floor Cannon Bridge House

Address line 2:

25 Dowgate Hill

Address line 3:

Postal town:

London

Post code:

EC4R 2YA

Telephone number:

0207 973 3036

Email:

e-seast@HistoricEngland.org.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear [REDACTED],

Thank you for your message of 7 December 2023 and for consulting us on the Binfield Heath Neighbourhood Plan.

I write to confirm that, after having considered the supporting documents, Historic England does not have any comments to make at this point.

With kind regards,

[REDACTED]

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

[REDACTED]

Public hearing

6 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.

I don't know

Response 7

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-26 15:22:52

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Strategic Planner

Organisation (if relevant):

Oxfordshire Council

Organisation representing (if relevant):

Address line 1:

County Hall

Address line 2:

New Road

Address line 3:

Postal town:

Oxford

Post code:

OX1 1ND

Telephone number:

[REDACTED]

Email:

[REDACTED]@Oxfordshire.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam,

Please find attached Oxfordshire County Council's response to the Binfield Heath Submission Neighbourhood Plan.

Email acknowledgment of this response would be greatly appreciated.

Kind regards,

[REDACTED]

[REDACTED]

Strategic Planner

Strategic Planning & Infrastructure

[REDACTED]

[REDACTED]@Oxfordshire.gov.uk

Oxfordshire County Council, County Hall, New Road, Oxford, OX1 1ND

<https://www.oxfordshire.gov.uk/>

You can upload supporting evidence here:

OCC.pdf was uploaded

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

[REDACTED]

Public hearing

6 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.

I don't know

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

District: South Oxfordshire

Consultation: Binfield Heath Neighbourhood Plan 2011-2035 (Submission Version)

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council supports the ambition of Binfield Heath Parish Council to prepare a neighbourhood plan and would like to thank the Parish Council for giving the County Council the opportunity to provide comments.

Officer's Name: [REDACTED]

Officer's Title: Planner

Date: 25 January 2024

ANNEX 1
OFFICER ADVICE

District: South Oxfordshire

Consultation: Binfield Heath Neighbourhood Plan 2011 – 2035 (Submission Document)

Team: Strategic Planning

Date: 25/01/2024

Strategic Comments

Following the County Council comments made to the Pre-Submission consultation in June 2023 regarding some Local Green Space designations overlap onto the Local Authority Highways land, we welcome the inclusion of the wording in this Submission document acknowledging as the Highways Authority the County Council has legal precedent to carry out any required works.

As also advised in the County Council's previous comments, the Transport team would like to reiterate the inclusion of OCC's Parking Standards in Policy BH13 – Accessibility, Highways and Sustainable Transport. This document can be found [here](#).

It is advised the Neighbourhood Plan should refer to the [LLFA Standards](#) in the Flooding and Drainage section (Policy BH14), as a signposting exercise to further guidance on the requirements to surface water from new developments. This section should also reference ENV4 in relation to watercourses.

District: South Oxfordshire

Consultation: Binfield Heath Neighbourhood Plan 2011 – 2035 (Submission Document)

Team: South & Vale Locality Team

Officer's Name: [REDACTED]

Officer's Title: Transport Planner

Transport Comments

In pre-submission response OCC Transport made the following comment:

Parking standards for all new developments, including garage dimensions should be in line with Oxfordshire County Council's Parking Standards. These can be found at the following link: [Parking standards for new developments \(oxfordshire.gov.uk\)](http://oxfordshire.gov.uk)

We suggest the following amendment to the policy: *'Be designed to avoid additional parking problems by having adequate off-road parking. All new residential developments must conform to Oxfordshire County Council's parking standards'*

It is noted the policy wording has been amended, however it is suggested it should be made clear that all new developments must adhere to OCC's parking standards.

District: South Oxfordshire District Council
Consultation: Binfield Heath Submission Draft Neighbourhood Plan (2011-2035)
Team: LLFA
Officer's Name: [REDACTED]
Officer's Title: FRM Team Lead
Date: 12/01/2024

LLFA Comments

Under section 5.3.15 Flooding and Drainage (Policy BH14) whilst provides information on current surface water flood risk areas and looks to address proposals for new development, the wording does not include for how development where an existing flood risk from this source will be considered in the NP. This may be reflective of the LPA planning policies as referenced, but currently this is not expressed in the NP.

The LPA should assure themselves that the NP meets its own policies, noted as EP4.

This section should also look to reference ENV4 in relation to watercourses as well as being important within this area for biodiversity and ecology, the watercourse are a key part of the flood mechanism and conveyance in this area and there is no acknowledgement of this in the text under 5.3.15.

The NP could refer to the LLFA Standards, as a signposting exercise to further guidance on the requirements to surface water from new developments.

District: South Oxfordshire District Council

Consultation: Binfield Heath Submission Draft Neighbourhood Plan (2011-2035)

Team: Climate Action

Officer's Name: Adam Symons

Officer's Title: Zero Carbon Oxfordshire Policy and Project Lead

Date: 12/01/2024

Climate Action Comments

There are no comments from the Climate Action Service

Response 8

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-26 16:55:51

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Planner

Organisation (if relevant):

Savills

Organisation representing (if relevant):

Coppid Farming Enterprise

Address line 1:

Wytham Court

Address line 2:

11 West Way

Address line 3:

Postal town:

Oxford

Post code:

OX2 0QL

Telephone number:

[REDACTED]

Email:

[REDACTED]@savills.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam,

Please find attached representations to the Binfield Heath Neighbourhood Plan Consultation prepared on behalf of Coppid Farming Enterprises.

We would be grateful if you could confirm receipt of this email and attachment.

Kind regards,

[REDACTED]

[REDACTED] MSc MRTPI

Planner

Oxford - Planning

Savills, Wytham Court, 11 West Way, Oxford, OX2 0QL

Tel : [REDACTED]

Mobile : [REDACTED]

Email : [REDACTED]@savills.com

Website : www.savills.co.uk

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You can upload supporting evidence here:

Coppid Farming Enterprises.pdf was uploaded

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

[REDACTED]

Public hearing

6 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.

I don't know

25 January 2024

Binfield Heath - Coppid Farming Enterprises Representations



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

Via email only: planning.policy@southandvale.gov.uk

Dear Sir/Madam,

**Binfield Heath Neighbourhood Plan
Consultation on the Submitted Neighbourhood Plan**

These Neighbourhood Plan Representations have been prepared by Savills (UK) Ltd, on behalf of our client, Coppid Farming Enterprises (The Estate), in response to the Examination Issue Binfield Heath Neighbourhood Plan Consultation. These Representations have been submitted in accordance with the deadline of 25th January at 12pm.

Coppid Farming Enterprises acknowledges the significant time and effort that Binfield Heath Parish Council have invested in preparing the Examination Issue of the Neighbourhood Plan (October 2023).

As previously mentioned, Coppid Farming Enterprises are the majority landowner within the Parish. In total, it is estimated that they own approximately 70% of the land within the Neighbourhood Plan area (comprising circa 2,500 acres) including agricultural land, residential properties and key community facilities. Coppid Farming Enterprises own land referred to as the Phillimore Estate Farm, as it is referred to within the Neighbourhood Plan.

Coppid Farming Enterprises have significant concerns that the comments previously made on the Regulation 16 Pre-Submission version of the Neighbourhood Plan (to Binfield Heath Parish Council) have not been taken on board. The previously submitted consultation response has been appended to this response. All of the comments made in the response dated 19 June 2023 still stand.

Accordingly, Coppid Farming Enterprises object to the Examination Issue of the Binfield Heath Neighbourhood Plan. The reasons for this objection are provided in the below table.

Key Point in Previous Representations (June 2023)	Binfield Heath Parish Council Steering Group Response (Regulation 22(1)(c) Statement)	Updated Position and Response
<u>Policy H8 (Previously H11) (Re-use & Conversion of Rural Buildings) and the Approach to Development</u> Policy H8 of the South Oxfordshire Local Plan supports housing allocations within	The Steering Group considered allocating development but state that there is no material demand	The point still stands, as it is not sufficient to state that development has already been

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<p>smaller villages and supports further growth through a Neighbourhood Plan. This policy states that a village of this scale a 5-10% increased above the number of dwellings in the 2011 Census. The Neighbourhood Plan states a 7.4% increase in housing numbers since 2011. This is contrary to national policy (Paragraph 61 of the NPPF) which states that housing targets are set a minimum.</p>	<p>and was not considered to be desirable. The Steering Group do not agree that the language used is anti-development. Therefore no changes have been made.</p>	<p>achieved, and no more is desired. No evidence has been provided regarding the lack of demand for additional housing. Coppid Farming Enterprises consider that the Neighbourhood Plan should take a more forward thinking and pragmatic approach, especially considering the South Oxfordshire District Council and Vale of White Horse District Council Joint Local Plan will extend to 2041, and this Neighbourhood Plan covers the period to 2035. It is suggested it may be beneficial for the Neighbourhood Plan to look further forward to align with the Local Plan timeframe and allocate for residential use.</p>
<p><u>Policy BH1 (Landscape Character and Value)</u></p> <p>Concern was raised that Policy BH1 is overly restrictive through a series of recommendations for the different character areas listed in Table 5 of the Neighbourhood Plan.</p> <p>Concern was raised around PLCA5 and the fact that it was not identified from the SODC Landscape Character Assessment. PLCA5 is identified as an important part of the area's history and include a major part of Binfield Heath. Despite this, the South Oxfordshire Landscape Character Assessment does not consider this to be any different to the surrounding landscape. It was recommended that the Landscape Character Assessment should be amended and PLCA5 omitted.</p> <p>In circumstances where PLCA5 is not omitted, comments were made around the specific wording relating to Housing and Inappropriate Features. There is</p>	<p>The wording of the policy has been slightly updated to include more detail on the Landscape Designations of the Parish.</p> <p>PLCA5 has not been omitted. The Steering Group add that the ancient Heath has had a material influence on how the parish has developed.</p> <p>It is noted that SODC have also commented on the ambiguity of this policy, and made suggestions to amend it. However no amendments to the</p>	<p>There is reference to AONB's throughout the Neighbourhood Plan. This needs updated to reflect the updated terminology, using 'National Landscapes' instead.</p> <p>Coppid Farming Enterprises object to the PLCA5 for the reasons set out previously, including that it is inappropriate to identify PLCA5 separately as it is in conflict with the South Oxfordshire Landscape Character Assessment.</p> <p>It is still considered that the amendments have not satisfied previous concerns and Coppid Farming Enterprises is still concerned that Policies H16,</p>

<p>concern that Table 5 under Housing states that 'over extension and suburbanisation; should be avoided. The previous response states that this is ambiguous and contrary to Policies H16, H18 and H20 of the South Oxfordshire Local Plan.</p>	<p>Housing section of Table 5 have been made.</p>	<p>H18 and H20 of the Local Plan provide sufficient control over development and therefore Table 5, and requirements under PLCA5 are unnecessary.</p>
<p><u>Policy BH3 (Areas of Special Local Character)</u></p> <p>It was previously suggested that Policy BH3 (Areas of Special Local Character) should be omitted from the Neighbourhood Plan as part of the Parish is covered by the AONB¹ it is inappropriate to apply further landscape designations. If the land was of specific natural beauty it would have been designated as part of the AONB.</p>	<p>The Steering Group have revised the wording based on comments from SODC, however have not made adjustments based on Coppid Farming Enterprises previous comments. They have responded that the 1992 Local Plan included Areas of Great Landscape Value, however this category was abandoned.</p>	<p>The abandonment of the Areas of Great Landscape Value designation supports the point made previously that this land does not need any additional landscape related designation. If the landscape is of National Landscape quality it would have been designated as such.</p>
<p><u>Policy BH5 (Previously BH4) (Important Views)</u></p> <p>We previous responded explaining that Policy BH4 is contrary to Policy BH13 of the Neighbourhood Plan and Policy H16 from the South Oxfordshire Local Plan which support infill development in Small Villages. Therefore, as currently worded, spaces between buildings do not have to be retained in accordance with this. This would fail to meet the basic conditions.</p>	<p>The Steering Group have simply stated that this comment has been considered but not agreed. No changes have been made despite SODC responding that a number of the Important View Triangles shown in the Neighbourhood Plan extend beyond the Neighbourhood Plan boundary, and the Steering Group have not provided sufficient justification. Therefore, the View Triangles identified are not consistent with the Landscape Character Assessment.</p>	<p>Coppid Farming Enterprises continue to object to Policy BH4 on the basis that it conflicts with strategic policies in the adopted Development Plan, and is not consistent with the Landscape Character Assessment also submitted as Appendix C. Therefore this policy fails to meet the basic conditions as required by Paragraph 2 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p>
<p><u>Policy BH4 (Previously BH6) (Local Green Spaces (LGS))</u></p> <p>We previously requested that LGS 1, 3, 17, 18, 20, 23, 24, 30 and 42 are deleted. This is due to concerns that the sites selected are not demonstrably</p>	<p>SODC have also responded that they are concerned about the size of a number of the Local Green Spaces proposed. The Consultation Statement</p>	<p>Due to no amendments to the proposed Local Green Space designations, Coppid Farming Enterprises strongly object to the designations of Local Green</p>

¹ Now known as National Landscapes, the term AONB was correct at time of writing the initial response.

<p>special to the local community and do not hold local significance, and the proposed Local Green Spaces comprise extensive tracts of land which reflect the character of the wider countryside in most cases. Relevant Examiner's reports support the reasons for concern, which results in conflict with the NPPF and failure to meet the 'basic conditions'</p>	<p>responds that the assessments have been revisited but the designations enjoy wide support from the parish so no changes have been made.</p> <p>The Steering Group have responded that any LGS with some form of footpath around multiple sides or through the middle is considered a 'special' place to the community.</p>	<p>Spaces that do not comply with Paragraph 106 of the NPPF. This results in the Neighbourhood Plan not meeting the basic conditions.</p> <p>We disagree that the presence of footpaths in the proximity of an open space makes it demonstrably special to the local community. Paragraph 106 of the NPPF is clear that LGS should only be designated in certain circumstances, which does not include having a footpath around it as set out in our previous assessment of the LGS designations.</p>
<p><u>Policy BH16 (Previously BH7) (Biodiversity)</u></p> <p>Policy BH7 seeks to maintain wildlife corridors to and from Harpsden Wood and Highlands Farm Pit SSSI. Neither of these are within the Neighbourhood Plan Area. As such, it is not considered appropriate to designate corridors to them as part of this Neighbourhood Plan.</p>	<p>The Steering Group have reworded Policy BH7 to clarify that the SSSIs are outside the Parish, and the wildlife corridors are within the Parish area.</p>	<p>Whilst this clarification is welcomed, it does not address the previous response that stated there are existing SSSIs and associated wildlife corridors outside of the Parish boundary, therefore wildlife corridors within the Parish boundary will not be of any benefit. Therefore, it is not considered appropriate to designate wildlife corridors as part of this Neighbourhood Plan. This element of the policy should be removed.</p>
<p><u>Policy BH8 (Previously BH11) (Re-use and Conversion of Rural Buildings)</u></p> <p>Policy BH11 relates to the re-use of rural buildings and conflicts with both Policies H1 and EMP10 of the South Oxfordshire Local Plan as it seeks to further restrict the uses. Therefore we suggested that Policy BH11 should be reworded.</p>	<p>SODC also provided comments on this policy noting that it should be amended to clarify its relationship with the South Oxfordshire Local Plan. The Steering Group have amended the policy wording.</p>	<p>The changes made to the Policy BH8 wording is acknowledged and appreciated.</p>
<p><u>Policy BH9 (Previously BH13) (Development including Infill and Redevelopment)</u></p>		

<p>Policy BH13 states that any development not in the three settlement boundaries set out in Figure 54 is considered to be open countryside and therefore infill is not supported in this location. This is contrary to Policy H16 of the Local Plan which doesn't restrict infill to sites within defined settlement boundaries in small villages.</p>	<p>SODC have also commented that the policy is more restrictive than Policy H16 and it is not clear from the evidence produced why the Neighbourhood Plan should deviate from the development plan. The Steering Group have made changes to the policy wording to reflect the comment about the height of the dwelling, but have maintained the tightly drawn three settlement boundaries at figure 54.</p>	<p>Coppid Farming Enterprises object to Policy BH9² due to the retention of the three tightly drawn individual settlement boundaries at Figure 50 which indicate that Binfield Heath is three separate settlements which is contrary to the single Small Village category given to all of Binfield Heath in the Local Plan. There are also key areas of the village excluded from these settlement boundaries. The settlement boundaries remain overly restrictive and conflicts with Policy H16 of the Local Plan.</p> <p>The wording of Policy BH9 continues to be in conflict with the adopted Development Plan, which would fail to meet the basic conditions test.</p>
<p><u>Policy BH6 (Previously BH12) (Non-Designated Heritage Assets)</u></p> <p>Planning Practice Guidance explains that Non-Designated Heritage Assets should be identified based on sound evidence. Coppid Farming Enterprises previously raised concern that there is very little justification as to why the proposed designations should be protected. The particular concerns were NDHA32 (Comp Cottage) and NDHA30 (Coppid Hall) due to insufficient evidence.</p>	<p>More detailed assessment has been included in Appendix D as suggested by SODC. SODC commented that the list of non-designated heritage assets does not identify or define the criteria used to include buildings on the list. Similar to the previous response, SODC commented that the descriptions should be specific and evidence based.</p>	<p>The previous comment that it is not clear whether the non-designated heritage assets have been identified and analysed by a heritage specialist still stands as Appendix D states that they have been suggested by parishioners. Coppid Farming Enterprises strongly object to the designation of Coppid Hall and Comp Cottage, and consider that there is still not sufficient evidence based justification.</p>
<p><u>Policy BH14 (Previously BH9) (Flooding and Drainage)</u></p> <p>Coppid Farming Enterprises did not previously comment on this policy as it was much more limited.</p>	<p>SODC recommended that further detail about ensuring surface water drainage will not add to the existing site runoff, therefore changes have been made.</p>	<p>This policy is more comprehensive than the BH9 version as the example provided by SODC has been taken on board, which is welcome. It is considered that this Policy</p>

² Policy BH9 was previously BH13 in the Regulation 16 version of the Neighbourhood Plan.

		replicates Policy EP4 of the Local Plan.
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Coppid Farming Enterprises play an important role in the vitality of the Parish and the key community assets which are identified in the Neighbourhood Plan. Coppid Farming Enterprises support the sustainable growth of the Parish to ensure the ongoing vitality and viability of existing assets including the Shop and Post Office and the recreation ground.

Coppid Farming Enterprises is keen to support the Parish Council and the work that they do, in line with their own community focused objectives. Notwithstanding this, Coppid Farming Enterprises object to the Neighbourhood Plan for a number of reasons, notably the anti-development approach that has been taken. This is clear through the language used, and policies and designations drafted to restrict development contrary to the adopted Local Plan and national policies.

Coppid Farming Enterprises is particularly concerned with the wording of a number of the policies, the language used in supporting text, the designation of such a significant number of Local Green Spaces, and identification of non-designated heritage assets. Cumulatively, these concerns give rise to the position that the draft Neighbourhood Plan clearly seeks to resist development, adding additional layers of protection not consistent with those contained in strategic policies, and conflicts with both strategic and national policies as set out above.

It has been demonstrated that the approach to the wording of policies, and particularly Local Green Spaces is in conflict with both national and strategic planning policies. This would result in the 'basic condition's' not being met in line with the requirements of Schedule 4B of the Town and Country Planning Act 1990 (as amended), and the draft plan not being found sound. As suggested, a number of amendments should be made to the draft plan to ensure it can be found sound and consistent with national and strategic policies. At this stage, the plan cannot be found sound and cannot therefore be made.

We trust that the above sets out Coppid Farming Enterprises position in regards to the Binfield Heath Neighbourhood Plan. We would be pleased to discuss these representations and our suggested amendments as required.

It would be appreciated if you could confirm safe receipt of this letter.

Yours faithfully,




Associate Director

19 June 2023

Binfield Health NP Reps



Via email: binfieldheathneighbourhoodplan@gmail.com

Dear Sir/Madam,

**Binfield Heath Neighbourhood Plan
Regulation 16 Consultation on the Pre-Submission Neighbourhood Plan and Supporting Documents**

These Neighbourhood Plan Representations have been prepared by Savills (UK) Ltd, on behalf of our client, Coppid Farming Enterprises (The Estate), in response to the Regulation 16 Binfield Heath Neighbourhood Plan Consultation.

Coppid Farming Enterprises acknowledge the significant time and effort that Binfield Heath Parish Council have invested in preparing the Pre-Submission Draft of the Neighbourhood Plan (April 2023).

The following Representations set out the formal response of Coppid Farming Enterprises, who have a keen interest in the future of the Binfield Heath Parish. As you will be aware, Coppid Farming Enterprises are the majority landowner within the Parish; in total it is estimated that they own approximately 70% of the land within the Neighbourhood Plan area. Coppid Farming Enterprises own land referred to as the Phillimore Estate Farm, as it is referred to within the Neighbourhood Plan.

The Estate owns extensive areas (circa 2,500 acres) of agricultural land as well as built areas of the Parish such as residential properties, the Binfield Heath Post Office and Shop and the Bottle & Glass Inn. As recognised within the Neighbourhood Plan (page 11), the Shop and Post Office and the Bottle & Glass Inn are referred to as the hub of the village as a well-used community facility, particularly given the lack of other facilities within close proximity.

As Binfield Heath Parish Council will be aware, the Neighbourhood Plan must meet the 'basic conditions' as outlined in Schedule 4B of the Town and Country Planning Act 1990 (as amended). Paragraph 2 to Schedule 4B outlines the basic conditions, of which in summary the following are most relevant:

- (a) Have regard to national policies;
- (d) Contribute to sustainable development; and
- (c) Be in general conformity with strategic policies in the adopted Development Plan.

As such, these Representations review the Neighbourhood Plan against the relevant basic conditions.

The Approach to Development

Policy H8 of the South Oxfordshire Local Plan sets out the approach to 'Housing in Smaller Villages' (of which Binfield Heath is identified). Policy H8 explains that the Council will support housing allocations within smaller villages which support further growth through a Neighbourhood Plan. Policy H8 also explains that the Neighbourhood Plan will need to demonstrate that the level of growth is commensurate to the character and scale of the village, expected to be between a 5 – 10% increase above the number of dwellings at the 2011 Census.

The Draft Neighbourhood Plan explains at Section 2.6 that since the 2011 Census, there has been a 7.4% increase in housing numbers within the Parish, which the Parish consider to be an appropriate level of growth considering the rural nature of the Parish.



However, Policy H8 of the South Oxfordshire Local Plan is clear that the Parish could allocate additional land for development at around a 5 – 10% increase above the 2011 Census. This is contrary to national policy in particular para. 60 of the NPPF which requires housing supply to be boosted significantly and that housing targets are set as a minimum number of homes that an LPA is expected to deliver.

The draft Neighbourhood Plan covers the period to 2035. It is understood that South Oxfordshire District Council and Vale of White Horse District Council have commenced a joint Local Plan Review to 2041, which may identify additional land for housing to meet future needs. As such, it may be beneficial for this Neighbourhood Plan to look further forward and allocate land.

Despite 7.4% of new housing being delivered, there is no explanation or justification as to why the Parish are not allocating additional land for housing in the village. It is not expected, nor would it be appropriate, that the Parish should allocate swathes of land; however the Parish should also consider the benefits that new development of an appropriate scale can bring to the village, particularly in terms of vitality and viability.

Additional housing for instance is imperative in supporting the future of key local facilities, including the Shop and Post Office. Furthermore, the allocation of sites for market and / or affordable housing would allow for affordable housing to be provided in the village, providing homes for future generations of the village.

Language Used within the Neighbourhood Plan

Whilst it is understood that the Parish do not wish to allocate large scale residential development, the approach of the Neighbourhood Plan as drafted is anti-development in its use of language. More specifically, the Draft Neighbourhood Plan appears to resist development across most locations.

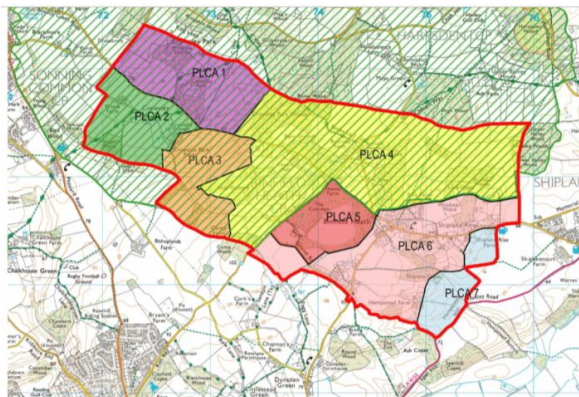
For example, on page 24, it is stated that more than half of planning permissions granted for new homes were in the AONB, which is 'reflecting a worrying trend for those who value the countryside'. This should be amended, given that such applications would have been carefully assessed by Officer's in considering the applications, and ultimately concluded that the applications were acceptable within the AONB. Key planning policies in the South Oxfordshire Local Plan, such as Policy H16 (infill development) and Policy H18 (replacement dwellings) do not preclude development in the AONB.

Additionally, draft Policy BH2 states that it is 'the unchanged distinct built environment that makes it worthy of protection'. The Estate suggests that a more appropriate form of words would be that new development should ensure that the built environment is protected.

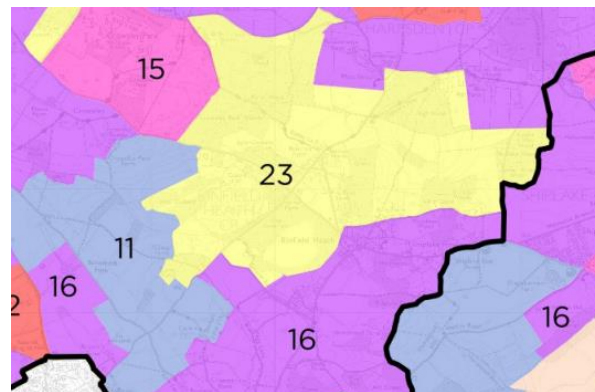
Policy BH1 – Landscape Character and Value and Table 5

It is understood that Terra Firma Consultancy Ltd prepared the Binfield Heath Landscape Character and Value Assessments which has informed this policy. There is significant concern that Policy BH1 is overly restrictive through a series of recommendations for the different character areas listed in Table 5 of the draft Neighbourhood Plan.

The Parish's Landscape Character Areas are set out in Figure 34 of the draft Neighbourhood Plan; these Landscape Character Areas are similar to the South Oxfordshire Landscape Character Assessment, with the exception of PLCA5:



Neighbourhood Plan Landscape Character Areas



SODC Landscape Character Areas

The draft Neighbourhood Plan explains that the PLCA5 is identified as an important part of the area’s history as it includes the major part of the historic ‘Binfield Heath’. Despite this, the South Oxfordshire Landscape Character Assessment does not consider this to be any different to the surrounding landscape, thus combining it with Landscape Character Area 23.

Significant concerns are raised in respect of PLCA5 in Table 5 for the following reasons:

- PLCA5 is no longer a heath. This site is now a mix of a private polo field and woodland. There is no public access to the site.
- PLCA5 should not be identified as a bespoke landscape character area due to the history of this field. The Landscape Character Areas should be identified on the basis of the current landscape.
- It is inappropriate to identify PLCA5 separately as it is in conflict with the South Oxfordshire Landscape Character Assessment.

Accordingly, the Landscape Character Assessment should be amended and PLCA5 omitted as a bespoke character area, with the reference removed from Policy BH1 and Table 5.

In the event that the Parish do not omit this character area, we would recommend that the following amendments are made to Table 5:

- **Housing** - it is stated that housing should avoid ‘over-extension and suburbanisation’ which ambiguous and contrary to policy:
 - It is not clearly defined what either ‘over-extension and suburbanisation’ means. These phrases should be appropriately defined to assist the decision maker.
 - Both Policy H16 of the South Oxfordshire Local Plan allows for back land and infill development, and Policy H18 supports replacement dwellings. Concerns are raised here that avoiding suburbanisation would unduly restrict housing development in this location under Policies H16 and H18. This would therefore conflict with strategic policies.
 - Policy H20 of the South Oxfordshire Local Plan is also supportive of extensions to dwellings. Therefore, further concern is raised around avoiding ‘over-extension’ as these may be acceptable under Policy H20. This demonstrates further conflict with strategic policies.
 - Policies H16, H18 and H20 of the South Oxfordshire Local Plan provide sufficient control over development. Setting out requirements in Table 5, such as under PLCA5, are unnecessary.

- **Inappropriate features** - with an aim to resist the installation of features such as inappropriate fencing, glazing, gates, sheds, outbuildings, swimming pools and lighting. There may be circumstances where such features are acceptable, in specific contexts. This would need to be considered and demonstrated as part of a planning application. It is unsuitable to define all features as 'inappropriate' without considering the specific context of each the application. The wording here should be amended. Indeed many of these works would be considered permitted development and therefore the Parish is unable to control this level of detail.

Policy BH3 – Areas of Special Local Character

Policy BH3 identifies two areas of land as an 'Area of Special Local Character'. The Policy explains that where planning permission is required, development will only be acceptable in certain circumstances, including compatibility with characteristics in Table 5. Our concerns with Table 5 are set out above.

Given that part of the Parish is covered by the AONB, it is inappropriate to further identify landscape designations in the Parish. No other special landscape designations are afforded to the Parish in the South Oxfordshire Local Plan.

If the land was of such specific natural beauty, it would have been designated as part of the Area of Outstanding Natural Beauty at the time parts of the Parish were designated.

On this basis, it is recommended that this designation is omitted from the draft Neighbourhood Plan and this Policy omitted in its entirety.

Policy BH4 – Important Views

Policy BH4 states that *'development proposals should allow for spaces between buildings to preserve views of countryside beyond and maintain the perceived openness of the settlement'*. However, this Policy is contrary to both draft Policy BH13 of the Neighbourhood Plan and Policy H16 from the South Oxfordshire Local Plan, which support infill development in Small Villages.. Within these policies, infill is defined as the filling of a small gap in an otherwise continuous built-up frontage, therefore spaces between buildings do not have to be retained in accordance with this.

Therefore, as currently worded Policy BH4 is in conflict with strategic policies in the adopted Development Plan. This would fail to meet the basic conditions.

It is recommended that Policy BH4 is amended to reflect that in some circumstances, spaces between buildings may be developed in accordance with Policy BH13 of the Neighbourhood Plan and Policy H16.

Policy BH6 - Local Green Spaces and Appendix F

Policy BH6 seeks to allocate areas of the Parish as Local Green Space (LGS). When designating Local Green Spaces, regard must be had to Paragraph 102 of the NPPF which states the following:

“102. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.”

The use of the wording 'should only' makes clear the LGS designation should not be used extensively.

Relevant Examiner's Reports

There are a number of Examiner's Reports of Neighbourhood Plans which detail consideration of Local Green Space Designations. In terms of designating extensive tracts of land, the Examiner's Report for Backwell (Nigel McGurk) dated 29th October 2014 reviewed a Local Green Space of 19ha and stated the following:

"In the case of Farleigh Fields, it is my view that 19 hectares also comprises an extensive tract of land. To provide some perspective, at least twenty three full size football pitches would easily fit in to an area of this size.

Given that the Framework is not ambiguous in stating that a Local Green Space designation is not appropriate for most green areas or open space, it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements. Specific to demonstrating that Farleigh Fields, and Moor Lane Fields are not extensive tracts of land, no substantive or compelling evidence has been presented." (Our emphasis)

In the case of Backwell, this led to the Examiner finding that the Neighbourhood Plan did not meet the 'basic conditions'.

Turning to the NPPF's requirement for demonstrating whether the Local Green Spaces are demonstrably special. In the case of Chapel-en-le-Frith, the Examiner's Report (Janet Cheesley) dated January 2015 reviewed a Local Green Space Designation stating:

"169. The site is in a countryside location on the outskirts of the settlement, projecting into the wider countryside. As such, the character of the site is as part of the surrounding countryside, rather than local in character. Whilst there is public access along the footpaths, and these footpaths appear to be well used by the local community, there are many areas of countryside where footpaths allow public access.

170. It is not the purpose of the Local Green Space designations to include countryside land that provides wider views of the countryside. In my view, the site is a large area which projects into the open countryside and is part of the wider countryside rather than local in character. Thus, even with the historical significance and possible wildlife significance, I do not consider that this site meets the criteria for designation as Local Green Space." (Our emphasis)

Accordingly, these Examiner's Reports provide clarification that land should not be designated as Local Green Space where it reflects the character of the vast majority of other land around the village; it is the character of the countryside; nor the designation of countryside land to provide views of the countryside.

Review of the Local Green Spaces Proposed

The Coppid Farming Estate own 12 of the 20 Local Green Spaces identified in the draft Neighbourhood Plan. There is significant concern around the designation of such a significant number of Local Green Spaces given national guidance on such allocations.

The 12 Local Green Spaces identified in the Coppid Estate ownership total around 73.38ha of land.. It is evident that the designation of such an excessive number of Local Green Spaces is contrary to national policy and adds an additional layer on unnecessary and unjustified designations.

Appendix F assesses each Local Green Space allocation against a series of criteria, including close proximity to the local community; beauty and amenity value; recreation value; historical value; tranquillity; and wildlife to confirm whether the site is demonstrably special to the local community. The matrix assessment process does not explain how each of these features are related to their scoring, and why such features are so demonstrably

special to the local community. The only way to fully understand why the Local Green Space has been identified as being demonstrably special to the local community is within the comments section.

Our comments on the Local Green Space designations owned by the Coppid Farming Estate are as follows:

Local Green Space	Site Area (ha) Approx.	Reasonably Close to the Community (Paragraph 120(a))	Comments on Site Being Demonstrably Special to the Local Community (Paragraph 120(b))	Local in Character and Not Extensive Tract of Land (Paragraph 120(c))	Conclusion
LGS 1	0.56	Relatively close	Comments in Appendix F explain that this site is crossed by a PRow; is inside of the AONB; granted European protection for Bats; and is a Priority Woodland. It is not considered that any of these features are sufficiently demonstrably special to the local community. These features are typical of many locations. No justification is provided as to why any of these features are demonstrably special.	The extent of this site at circa 0.56ha is considered to be excessive, when considering the site and how the designation could have been drawn.	Delete LGS Designation
LGS 3	32.8	Relatively close	Comments in Appendix F suggest that this site is the birthplace of the village; contains Ancient Woodland; Priority Woodland; footpath and private polo field; and home to a deer herd. The majority of this site is not publicly accessible, with the existing bridleway adjacent to the site. As the majority of the site is not accessible, it is unclear why a site of such scale is demonstrably special to the local community. The woodland designations and deer herd are typical of many locations across the Country. The deer could locate to any field they so wish. These characteristics are not demonstrably special to Binfield Heath.	This is a significant area of land at 32.8ha. This is an extensive tract of land, which is inappropriate and evidently conflicts with the NPPF. The character of this land is of the wider countryside and not of the settlement.	Delete LGS Designation
LGS 4	0.1	Relatively close	Agree with the identification of these Local Green Spaces.		Retain
LGS 13	0.29	Relatively close			
LGS 16	0.5	Relatively close			
LGS 17	6.03	Relatively close	The vast majority of LGS 17 is not publicly accessible. Comments in Appendix F suggest that this is identified due to being part of the former Heath. No justification is provided as to why this element of the former Heath is demonstrably special. Furthermore, it is stated that it would be useful to have a path across this site, but does not suggest that this site is demonstrably special when no path is present.	The scale of this designation as 6.03ha is considered to be inappropriate, forming a large tract of land. The character of this land is of the wider countryside and not of the settlement.	Delete LGS Designation

LGS 18	5.3	Relatively close	<p>Please note that the Permissive Path is in the wrong location on the plans within Appendix F. Comments in Appendix F note that footpaths cross the site, deer herd on this field and the site provides a route to the bluebell woods. Priority woodland.</p> <p>These are not sufficient reasons to justify that this site is demonstrably special to the local community – particularly as the bluebell woods are not within this site and deer can herd on any field within the Parish, as evidenced by descriptions of other proposed LGS Priority woodland is not a sufficient designation to justify that this site is special.</p>	<p>Circa 5.3ha of land is considered to be an extensive tract of land.</p> <p>The character of this land is of the wider countryside and not of the settlement.</p>	Delete LGS Designation
LGS 20	4.1	Not agreed. The site is not reasonably close to the community.	<p>The comments explain that a footpath is adjacent to this site, and that it is Ancient and Priority woodland, which has bluebells visited by locals in the Spring.</p> <p>The majority of this site is not publicly accessible, with the exception of the northern boundary. As such, the justification of visiting the site for bluebells is not an appropriate characteristic to designate this site when the site is not accessible to the Parish.</p> <p>Ancient and Priority woodland designations are common features across the country. No justification is provided as to why this woodland is demonstrably special.</p>	<p>At circa 4.1ha of land, this site is a large extensive tract of land, particularly given that the majority of the site is not publicly accessible.</p> <p>The character of this land is of the wider countryside and not of the settlement.</p>	Delete LGS Designation
LGS23	7.21	Relatively close	<p>Part of this site is owned by our client. Appendix F justifies this site as being demonstrably special due to being a former part of the Heath, having woodland and being within the AONB. Also, due to the site being a location granted European protected species for bats.</p> <p>It is not clear why any of these characteristics are demonstrably special to the local community. Planning policies and the location within the AONB provide appropriate protection in any event.</p> <p>The site is not accessible to the local community, which further limits its special value to the community.</p>	<p>This is evidently an extensive tract of land at circa 7.21ha, particularly given that none of the site is publicly accessible.</p> <p>The character of this land is of the wider countryside and not of the settlement.</p>	Delete LGS Designation
LGS 24	1.77	Relatively close	<p>This site forms a paddock which is inaccessible to the public. The site is not viewable from the adjacent lane due to the mature hedgerows. Comments in Appendix F explain that the site is designated due to being a former part of the Heath, being woodland, part of the AONB, and contributing to the rural nature of the lane.</p> <p>In this case, it is considered that these reasons do not justify that this site is demonstrably special to the local community – the site is reflective of the rural character of many areas</p>	<p>At circa 1.77ha, this site is an extensive tract of land.</p> <p>The character of this land is of the wider countryside and not of the settlement.</p>	Delete LGS Designation

			around the country, but not demonstrably special. In any event, the site is within the AONB which provides appropriate protection for the Parish.		
LGS 30	3.68	Relatively close – although detached from majority of Parish	It is explained in Appendix F that the site is walked as a permissive path through the woodland. This permissive path is at the goodwill of our client, and could be formally closed at any point. The comments in Appendix F also explain that the site is within an RSPB designation, and is covered by Ancient Woodland. It is not explained why any of these features are demonstrably special to the local community – such as for specific types of wildlife; these features ensure protection of the site in any event.	The majority of this site is not publicly accessible. Covering circa 3.68ha, it is considered that this site covers an extensive tract of land. The character of this land is of the wider countryside and not of the settlement.	Delete LGS Designation
LGS 42	11.04	Disagree – this site is largely detached from the majority of the Parish.	Appendix F assess the site as having wetland and being valued for walks. Both Public Rights of Ways and wetlands are common through the country, but there is no confirmation provided as to why these features make this site demonstrably special to the local community, and particularly a site of such scale.	At circa 11.04ha, this is evidently an extensive tract of land which is inappropriate for designation. The character of this land is of the wider countryside and not of the settlement.	Delete LGS Designation
Total	73.8ha				

In summary, we request that Local Green Spaces 1, 3, 13, 16, 17, 18, 20, 23, 24, 30 and 42 are deleted. As explained above, there is significant concern that these Local Green Spaces do not meet the requirements of Paragraph 120 of the NPPF, as the sites are not demonstrably special to the local community and do not hold particular local significance; the sites reflect the character of the wider countryside in most cases instead of the settlement; and, the sites comprise extensive tracts of land.

For all of the above reasons, the sites should be deleted as they do not comply with the NPPF, which would result in the Neighbourhood Plan not meeting the ‘basic conditions’ as required, demonstrated by the above Examiner’s reports.

Policy BH7 – Biodiversity

Policy BH7 seeks to maintain wildlife corridors to and from Harpsden Wood and Highways Farm Site of Specific Scientific Interest (SSSI). Neither SSSI are within the designated Neighbourhood Plan Area.

Given that both SSSI’s are formal ecological designations with necessary safeguarding requirements in place through national and local policy, it is not appropriate to designate wildlife corridors as part of this Neighbourhood Plan.

Policy BH11 – Re-Use of Rural Buildings

Policy BH11 explains that the re-use of rural buildings will only be used where the design has been informed by the Design Code, reflects the character of the local area and the proposed use is compatible with the setting.

Policy H1 of the South Oxfordshire Local Plan supports the use of redundant or disused buildings into residential uses whether it enhances immediate surroundings. Furthermore, Policy EMP10 covers development in Rural Areas and provides clear support to the sustainable growth and expansion of all types of businesses and enterprises in rural areas through the conversion of existing buildings.

Policy BH11 therefore conflicts with both Policies H1 and EMP10 of the South Oxfordshire Local Plan, as it seeks to further restrict the uses. As such, Policy BH11 needs to be reworded as it currently fails to accord with strategic policies, and consequently would not meet the basic conditions.

Policy BH12 – Non-Designated Heritage Assets

The draft Neighbourhood Plan proposes a number of non-designated heritage assets. Whilst Coppid Farming Enterprises recognise that there are heritage assets within the Parish that should be enhanced and protected, the reasoning for the proposed designations are based on limited, if any, evidence.

Paragraph: 040 Reference ID: 18a-040-20190723 of the Planning Practice Guidance explains that Non-Designated Heritage Assets should be identified based on sound evidence. In addition to this, the evidence should include criteria for identifying them.

It is not clear whether supporting document, Appendix D, was prepared by a heritage specialist, and provides very little justification as to why the proposed designations should be protected. This is contrary to national guidance.

Of particular concern are the following proposed Non-Designated Heritage Assets:

- NDHA32 – Comp Cottage. The commentary only explains that this is identified for preservation due to the fact it was built by the Phillimore Estate in the late 19th Century.
- NDHA30 – Coppid Hall. This is identified for preservation due to being built on the site of Old Coppid Hall.

In both cases, there is insufficient evidence available to justify why these features are of sufficient heritage interest to require designation as a Non-Designated Heritage Asset. No evidence of the criteria for identifying them is provided and it is unreasonable to suggest designation without a robust justification.

This is particularly relevant for Comp Cottage for example, which is not of any valuable architectural or historic merit and designation due to when it was constructed, rather than for any historic or architectural merit, is entirely unjustified.

The proposed designation of Coppid Hall on the basis of it being constructed on the site of the former Coppid Hall is further evidence of an unjustified approach by the Parish, particular as the building itself has limited historical and architectural merit.

Policy BH13 – Infill Development

Figure 54 of the draft Neighbourhood Plan sets out three Settlement Boundaries. Policy BH13 explains that any development not within the three settlement boundaries set out in Figure 54 is considered to be open countryside, and therefore infill will not be supported in such location. This approach is contrary to Policy H16 of the South Oxfordshire Local Plan which doesn't restrict infill development to sites within defined 'Settlement Boundaries' in Small Villages.

Policy BH13 seeks to further limit the scope of development that is suitable as infill development – either to one or two dwellings, of up to a maximum of two storeys. This is contrary to Policy BH13 of the South Oxfordshire Local Plan, which does not limit the number of dwellings nor the building height, with each case considered on

its own merits, a well-established principle of the planning system. As such, the approach of Policy BH13 is evidently contrary to strategic policy.

The supporting text to this policy on Page 98 of the draft Neighbourhood Plan also states that housing on greenfield sites is likely to be inappropriate, particularly given the AONB designation. This supporting wording should be amended as it is currently misleading as drafted, given that Policy H16 of the South Oxfordshire Local Plan does not preclude development either on greenfield sites or within the AONB.

Policy – Community Assets

This policy has no policy reference available. For clarity this should be added.

It should be noted that the Post Office and Shop and the Bottle & Glass Inn are identified as existing community facilities, and are both owned by Coppid Farming Enterprises. It is recognised that these are important to the sustainability of the Neighbourhood Plan area and the wellbeing of the local community, therefore Coppid Farming Enterprises have a particular interest in the future of enhancing and sustaining these assets.

Conclusion

As the majority landowner in the Parish, Coppid Farming Enterprises play an important role in the vitality of the Parish and the key community assets which are identified in the Neighbourhood Plan.

Coppid Farming Enterprises is keen to support the Parish and the work that they do, in line with their own community focused objectives. Noting the closure of other facilities listed in the Neighbourhood Plan, Coppid Farming Enterprises is supports the sustainable growth the Parish ensure the viability of existing assets including the Shop and Post Office and the recreation ground.

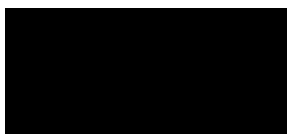
Notwithstanding this, as explained within these Representations, Coppid Farming Enterprises is particularly concerned with the wording of a number of the policies, the language used in supporting text, the designation of such a significant number of Local Green Spaces, and identification of non-designated heritage assets. Cumulatively, these concerns give rise to the position that the draft Neighbourhood Plan clearly seeks to resist development, adding additional layers of protection not consistent with those contained in strategic policies, and conflicts with both strategic and national policies as set out above.

It has been demonstrated that the approach to the wording of policies, and particularly Local Green Spaces is in conflict with both national and strategic planning policies. This would result in the 'basic condition's' not being met in line with the requirements of Schedule 4B of the Town and Country Planning Act 1990 (as amended), and the draft plan not being found sound. As suggested throughout these Representations a number of amendments should be made to the draft plan to ensure it can be found sound and consistent with national and strategic policies. At this stage, the plan cannot be found sound and cannot therefore be adopted.

We trust that the above sets out Coppid Farming Enterprises position in regards to the draft Binfield Heath Neighbourhood Plan. We would be pleased to discuss these Representations and suggested amendments as required.

It would be appreciated if you could confirm safe receipt of this letter.

Yours faithfully




Associate Director

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

Response 9

Submitted to Binfield Heath Neighbourhood Plan: Submission Consultation
Submitted on 2024-01-26 16:59:49

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Adviser Operations Delivery

Organisation (if relevant):

Natural England

Organisation representing (if relevant):

Address line 1:

County Hall

Address line 2:

Spetchley Road

Address line 3:

Postal town:

Worcester

Post code:

WR5 2NP

Telephone number:

0300 0603900

Email:

consultations@naturalengland.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

For the attention of

Please accept our apologise for the delay response, please find Natural England's response in relation to the above mentioned consultation attached.
Kind regards,

Adviser
Operations Delivery, Consultations Team
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

Tel 0300 0603900

mail to: consultations@naturalengland.org.uk


www.gov.uk/natural-england

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

You can upload supporting evidence here:

 NE Response.pdf was uploaded

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



Public hearing

6 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.

I don't know

Date: 26 January 2024
Our ref: [REDACTED]
Your ref: Binfield Heath Neighbourhood Plan



[REDACTED]
South Oxfordshire & Vale of White Horse District Councils

BY EMAIL ONLY

planning.policy@southandvale.gov.uk

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

T 0300 060 3900

Dear [REDACTED]

Binfield Heath Neighbourhood Plan

Thank you for your consultation on the above dated 07 December 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 and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

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

Yours sincerely

[REDACTED]
Consultations Team

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

Natural environment information sources

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

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². 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](#)³.

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](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ 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.

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.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. 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](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ 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 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. 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 and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- 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 reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

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. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, 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).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.