

**North Hinksey Parish Neighbourhood Plan:
final responses to Examiner's Clarification Note.**

Part 1: responses to 'Points for Clarification'.

This section deals with responses from the Parish Council to the specific listed policy clarification points, in the same order in which they appear within the Examiner's Clarification Note.

Map 1.2

This map as included in the submitted Neighbourhood Plan is correct in identifying the land in question as lying within the Green Belt, which has always been the case. The Neighbourhood Plan is not attempting to change the Green Belt boundary in any way. No correction to the Neighbourhood Plan is required.

The representation from Woolf Bond is a repeat of the questions raised within the final public consultation carried out by the Neighbourhood Plan Team. At that time it was stated in response by the Neighbourhood Plan Team that the indicative map within the Vale of White Horse District Council Local Plan 2031 (the adopted policies map as referred to by the respondent) was in fact incorrect, leading to a discrepancy between the two maps. This Local Plan map has now been corrected by the Vale, so a discrepancy no longer exists. See response to respondent 5 (Woolf Bond) in Part 2 of this document for further details.

Policy HS2

Given the inclusion of a separate policy on balance of housing types (Policy HS5) in the final submitted version of the Plan we would not be averse to now removing the reference to a 'balanced community' within Policy HS2.

Policy HS3

If the main elements of Policy HS3 were to be retained (from 'significantly higher densities' onwards to the end), and the minimum density level of 30 dwellings per hectare (net) were restated within the first sentence of this retained section, then we would not be averse to modifying the wording by removing the majority of the initial section where it quotes Local Plan Core Policy 23.

Policy HS6

We would definitely strongly encourage the inclusion of these guidelines (the two bullet points) as applying to land subsequently removed from the Green Belt in addition to land within any Conservation Area. We would be amenable to a rewording of the Policy to be more supportive overall, and agree that it may be possible to relocate some of the earlier text (including the reference to 'urban design principles') to the supporting text in paragraph 4.1.4.6 section 6, but please also see our comments to respondent 4 in Part 2 of this document where it is noted that advice on this emerging Policy from the Vale has varied considerably over time.

With regard to the implementation of guidelines contained within bullet point 2 of the Policy we note that the response from the District Council itself states concerns about this wording not being sufficiently supportive, which we accept (see our comments to respondent 4 in Part 2 of this document), but they do not query their ability to identify and implement suitable design

mechanisms of the type suggested. This would obviously require a certain degree of interpretation on their part as to what would be suitable based on the size and exact location of the proposed housing development

Policy EE1

We understand the Examiner's observation that the link to a community action weakens the Policy, and would not be averse to the proposed modification whereby supporting text was used instead of referencing community action CAEE2 within Policy EE1, although we do believe that the supporting text already explains the logic behind the strategy. We would still intend to include community action CAEE1 in addition to any new supporting text. Perhaps the third part of the policy should be more specific about what the business identity should be? The community action reflects the fact that there is still plenty of work that needs to be done with the District, City and County council to turn this policy into a more substantive strategy (including where the specific transport assets/structures need to be built).

The Community would like a tighter policy that commits everyone to a single business identity that establishes the principles of a new 'smart centre' focusing on professional services and IT companies. That is an evolution not a revolution type strategy. We would like to define how the business assets in the parish should be targeted so that we are in general conformance with the main strategic documents influencing the region - namely the Oxford City and Growth deals.

We are open to suggestions about how we can strengthen the policy and still retain the strategic principles that we are trying to implement.

Policy EE2

We would not be averse to the suggested modifications to the Policy if the requirement to abide by the identified key principles was still clearly retained in the revised version.

Perhaps EE2 should be structured more like EE3 where we talk about what would be supported. Whilst EE3 gives the developer options to select from, EE2 is supposed to direct the developer about minimum requirements. It is the key principles that matter and we would not want to dilute their impact. However, it sounds as though the Examiner seeks to strengthen them and in that respect we are open to discussing the text.

Policy TR1/TR2

Policy TR1

The first two bullet points should apply to all development proposals. The third and fourth should apply to any development that seeks to replace entirely any existing buildings or build on brown- or green-field sites. Limitation to "major" developments will mean that replacement of a large house by flats, with corresponding increases in traffic generation and parking, will be excluded. Thus, a series of such replacements, e.g. on Cumnor Hill, would make no contribution under this policy.

Policy TR2

The intention of this policy is that it should apply to ALL developments. This should not be controversial. Failure of smaller developments to provide adequate parking leads to more on-road

parking, associated congestion and disruption of public transport routes, countering the NPPF recommendation for concentration and modal shift to walking, cycling and public transport. The requirement to maximise landscaped green infrastructure is designed to maintain the semi-rural character of North Hinksey Parish. Regarding the provision of electric vehicle charging facilities, if Climate Change is to be taken seriously, most of transport will need to be electric (from renewable or nuclear sources) in the near future, and therefore this requirement should not be limited to just major developments.

Policy TR3/TR4/TR5

Provision of infrastructure, including good, safe access should be part of any planning policy. The main thrust of these policies supports the NPPF recommendation for concentration on, and modal shift to, walking, cycling and the use of public transport, thereby also reducing carbon dioxide and other emissions.

It should be noted that some planning applications can have a significant impact on the local road network (e.g. the Botley Centre redevelopment, which includes variations to the road layout and crossings within the works), and these factors need to be taken properly into consideration. Significant changes to infrastructure might also be required to adapt the local roads in relation to implementing various aspects of the proposed Rapid Transit System.

Policy S11

It is considered extremely important to list the whole of the Oxford Brookes University Harcourt Hill Campus as a social facility under Policy S11 in addition to specifically listing Brookes Sports, Harcourt Hill (the sports centre and grounds within the Campus) as a leisure facility. Were the whole of the Campus to be relocated to another site, or simply shut down, then Brookes Sports would also cease to exist, as it is not an independent organisation. As has been explained within the Neighbourhood Plan itself, and in further detail within the supplementary document *Provision of Leisure Facilities*, Brookes Sports provides a wide range of sports facilities for use by the wider community in addition to its own students, including some that would not otherwise be available anywhere else nearby (e.g. their swimming pool).

Oxford Brookes University as a whole plays a key role in the provision of further education within the Oxford area, and as such is listed alongside other educational establishments located within the parish. See also the response to respondent 9 (Oxford Brookes University) for further comments relating to the classification and listing of this organisation as social infrastructure within the Neighbourhood Plan.

Policy UT2

Comment 1 on evidence to support the need for this Policy:

As described in the Plan, residents expressed widespread support for high standards of sustainability throughout the Plan consultation. See Page 38 and the community policies in the Plan.

Recently, the NHPC at its February 2019 meeting unanimously supported a motion to declare a climate emergency and accompanying action plan, which committed the council to 'help

make our community carbon-neutral by 2030 by carrying out the following actions', among others:

- 'Seek-to ensure the highest sustainability standards for all major new developments within the parish and work with the VoWHDC and developers to ensure enforcement;
- Support the Neighbourhood Plan Team through the process of Independent Examination and on to adoption of the Plan in retaining all the elements relevant to climate change and carbon neutrality (e.g. carbon emission reduction standards, energy efficiency, renewable energy etc.) contained in the version of the Plan submitted to the VoWHDC.

High standards of energy efficiency and renewable measures will simultaneously help reduce fuel poverty:

- On average fuel poverty rates in North Hinskey and Botley in LSOA 002D, 002E, and 002F are 7.4%, 9.4% and 9.0% in 2016
- However, North Hinskey has a high proportion of early to mid-20th Century detached and semi-detached housing which have a relatively high percentage of fuel poverty compared to other housing types

(Source: Department for Business, Energy & Industrial Strategy, Fuel poverty tables, published 2018, <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2018>).

Comment 2 on whether it is reasonable to apply the Policy to all new developments:

We think this policy is reasonable/appropriate/practicable and should be applied to all new developments whether residential or non-residential. The 40% target in the Plan (which lasts until 2031) was chosen to align with the UK government's legally binding target of reducing CO2 emissions by at least 80% by 2050, compared to 1990 levels, with interim targets of 37% by 2020, 51% by 2025 and 57% by 2030. In the light of recent developments outlined below **the 40% reduction target is now clearly inadequate and needs to be strengthened**, rather than weakened (see suggested amendments below) for the following reasons:

Climate emergency and changing public opinion

- a. The UK Parliament declared a climate emergency on May 1st 2019.
- b. In response to a request by the UK government, the UK Climate Change Committee recommended an accelerated emissions reduction target of net-zero (rather than 80%), by 2050 in the UK (although other experts say netzero needs to be achieved by 2030 or 2025). Its statement said that this target can be achieved within the expected economic costs already accepted by Parliament, but will only be possible if clear, stable and well-designed policies are produced without delay.
- c. Dozens of local authorities across the country, including NHPC, VOWH, Oxfordshire County Council and Oxford City Council, have declared climate emergencies, there have been school strikes, and mass civil disobedience by the Extinction Rebellion campaign has brought parts of London to a standstill.
- d. Recent opinion polls in the UK show that a majority of people believe we are facing a

climate emergency and that the government should do more to tackle it.

- e. The Confederation of British Industry has called for a supportive and timely response from the government to reach the new target.
- f. The 2018 IPPC report warned that we have 12 years – now 11½ years – left to keep warming below 1.5 degrees.
- g. More widely, an ethical perspective about climate justice demands that the countries that have the highest historic responsibility for climate change, such as the UK, do the most to reduce it

Housing:

Specifically, with respect to homes, it is inevitable, given the above developments, that the government will move to strengthen housing building regulations in line with accelerated carbon reduction targets, as advised by the Climate Change Committee.

A February 2019 report by the Climate Change Committee said that the UK's legally-binding climate change targets will not be met without the near-complete elimination of greenhouse gas emissions from UK buildings from both new and existing housing.

[\(https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/\)](https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/)

Experts agree that all new housing and non-residential development must be carbon neutral to meet the targets.

There are already signs that the government is moving in this direction. It recently added a new paragraph to its National Planning Guidance on climate change (not yet passed into law?), saying that Councils can set higher energy performance standards than the building regulations, but that different rules apply to residential and non-residential premises. For residential schemes, it says council can set standards up to the equivalent of level four of the Code for Sustainable Homes (a 25% reduction compared to building regulations). For non-residential development, no limit is stated. Chancellor Philip Hammond announced in his Spring Statement on 13th March that from 2025 gas boilers will be banned in new homes. Looking forward it is inevitable that sustainability standards will be further strengthened by government.

With respect to viability and costs we provided details in the Plan about the likely cost implications of a 40% reduction for developers on footnote page 42 and footnote 4. High standards of sustainable design and energy efficiency may marginally increase short term development costs. But all experts indicate that the additional costs are marginal. The Plan also points out that it will be more expensive for developers to retrofit existing dwellings to meet the UK's new carbon reduction targets, than to introduce them at construction stage. If, despite expert evidence, there were to be any viability issues, it would be the responsibility of the government to address this via its policy framework and through financial incentives.

We have sought to address the inspectors and the other commentators concerns but as noted in the Plan the burden of proof is on the Inspector to demonstrate how the Neighbourhood Plan would comply with climate science and legal and moral duties if this policy were to be weakened.

Comment 3 proposing moving paragraphs after section c) to become supporting text:

We agree that this would be appropriate.

Summary of our position relating to Policy UT2 taking into account the above information:

We strongly support the inclusion of Policy UT2 within the Plan to cover all new developments, and given recent developments we would like to suggest amending the wording of sections a) and b) of Policy UT2 from that currently within the submitted Plan to the following:

- a) All new residential developments, conversions and non-residential developments must achieve the highest standards of sustainability ; in line with the requirements of climate change science, the 2018 IPPC findings and recommendations, the UK Climate Change Act 2008 the 2004 Planning and Compulsory Purchase Act, the NPPF, VOWHDC Local Plan 2031, and Oxford City Council's preferred options in the Local Plan (2016-2036) for energy performance or carbon emissions targets; in response to the Government's, VOWH's and NHPC's declaration of a climate emergency and expert advice; and to help achieve the Independent Commission on Climate Change's revised 2050 carbon target; by:
 - (i) reducing carbon emissions by a minimum of 40% (of regulated energy use) compared to base business regulations; and after 2025 must be carbon neutral; or comply with superseding guidance and legislation where higher
 - (ii) incorporating renewable energy and heating sources. These may include solar PV and thermal heating and or connection to a future district heating network, heat pumps, sustainable biomass'
 - (iii) appointing an expert energy advisor to ensure implementation of, and provide post construction evidence to the District Council of compliance with, the above conditions. The latter shall include:
 - thermal images of the building, thermal bridging and air tightness for every building;
 - commissioning records of heating, ventilation systems and low carbon systems (solar thermal, heat pumps etc.);
 - smart metering and feedback from residents.
- b) Non-residential development proposals will be supported where they achieve a level of performance equivalent to BREEAM excellent or above (such as Passivhaus standards), to be demonstrated at the planning application stage.

Policy GS1

Policy GS1 is very similar in structure & intent to Policy SI1. The two Working Groups discussed & adopted this approach intentionally at the time of devising the policies.

We feel that the wording of this Policy should not be amended as all the sentences within the Policy are valid and the last two sentences of the second paragraph clarify the first and wouldn't tie in as clearly if they were moved into supporting text.

Policy GS2

We note your guidance to include the words "the policy 'supports' development (subject to other policies) which deliver any or all of the criteria (as relevant to the proposal)."

Our interpretation of your suggested wording is that it's saying 'if you write that you're going to meet one of the criteria listed below, your application will be supported', which isn't the intention of the policy. We may have misinterpreted your intention and would be glad to hear from you again as we try to craft a clear, unambiguous policy.

Our intention is that this policy informs all applications and ensures that each application meets as many of the criteria as possible. It is essential to emphasise that development will only be supported if all of the relevant criteria are met other than in exceptional circumstances. We would note that we've worked closely with the VOWHDC to produce the wording as it currently stands, and also that they have not raised any concerns or other comments on this Policy during this consultation.

Policy GS3

The current policy was guided and written with the direct involvement and strong support of the VOWHDC planning officer to ensure that it aligned with the Vale's approach and did not prohibit development. It has not attracted any comments from the VOWHDC at this consultation so our understanding is that it does not cause them any concerns.

That said, we note your comments and are keen to know your views on a restructured wording such as:

"Development will be supported where it makes a positive contribution to, or where any adverse impacts will have limited harm on, locally important views of the parish as set out in Appendix G, Map G.4. Any development proposals within views from these identified viewpoints will be required to submit a Visual Impact Assessment at the application stage."

However, we would wish for further consultation to take place with the Vale's planning officers, not least out of respect of their responsibility to implement the policy, before adopting any amendment to the current wording.

Policy BU1

We note your comments about the confusing nature of the Policy as currently written, and would not be averse to a restructuring and shortening of the Policy in an overall form that the redevelopment of the site 'will be supported' (as proposed in several of your comments on other Policies) if you feel that this would be beneficial. Perhaps this shortening would include transferring some of the initial section to the supporting text.

We feel that this Policy is essential as an addition to Core Policy 9 of the Local Plan as it covers several major issues in more detail than Core Policy 9, without conflicting with it. Similarly it does not conflict with Policy 13 of the Local Plan on the Green Belt, but provides more local detail for consideration in any masterplan. Of particular importance to us are the following requirements:

- a. The need to minimise any increase in students and staff travelling to the site and the subsequent negative impact that would have on the local road network, to be achieved through ensuring that any new accommodation is used primarily for staff and students assigned to work or study at the campus, not allowing an increase to the number of parking spaces on site, and restricting the increase in the overall number of students travelling to the site. Encouraging use of public transport would further reduce any negative impacts. It should be noted that Oxfordshire County Council also have significant concerns about the impact of any redevelopment of this site which was one of the main reasons why a previous masterplan failed to gain approval. Regarding the restriction in section b) on accommodation that requires any new buildings to be used solely for staff and students (and not let out on the open market) we feel that is very appropriate for an educational establishment sited within the Green Belt, and ongoing assignment of that accommodation to staff and students who primarily work or study on that site would be the responsibility of Brookes themselves to monitor, with the requirement being that they commit to that requirement in their masterplan.
- b. The need for clarity on what is an appropriate limit for building on this sensitive site lying within the Green Belt and the overall design requirements for the site. This includes both the footprint of any buildings, which following discussions with Brookes representatives we agreed should be within the major development site boundary of the campus as indicated on Map H.1 in the Plan (rather than the previous suggestion of the current building footprints, which it was felt would have been too restrictive), and the overall design of any built structures, which should take note of the North Hinksey Parish Character Assessment (January 2018), a supporting document to this Plan, and be appropriate to the particular character area that it lies within as identified in that document.

See also our replies to respondent 4 (Vale of White Horse District Council), and respondent 9 (Brookes University) in relation to Policy BU1.

We would welcome the opportunity to discuss in detail any revised Policy BU1 that is being proposed should you consider that it requires significant changes to its structure and wording, and would be happy to provide further input at that stage.

Part 2: Responses to representations to the consultation run by VWHDC.

This section of the Parish Council's response to the Examiner deals only with the feedback generated by VWHDC's public consultation period, and the feedback references used correspond with the nomenclature as it appears on the VWHDC website.

We consider that the feedback from respondents 2 (ID 111359557, National Grid), 3 (ID 111363050, Environment Agency), and 10 (ID 113076031, Natural England) do not impact on the Plan and hence do not require a response or any further action by the Parish Council or Neighbourhood Plan Steering Group.

For the remainder we comment as follows:

Respondent 1 (ID 110810073), Cumnor Parish Council:

Brief summary of comments	Response / remedial action
Paragraph 1.2.5, objection to description of 'many residents of Cumnor Parish feeling more closely associated with Botley'. This is a repeat of similar comments made to the final public consultation run by the Neighbourhood Plan Team.	This paragraph forms part of the background information to the Plan, rather than impacting directly on any of the Policies, and as such is intended to be generally descriptive rather than detailing hard data. In this instance we feel that the statement is a true reflection of the situation, and it should be noted that the use of the word 'many' does not imply a majority, merely a significant number. Although not resulting from responses to a formal survey the description results from verbal comments received from Cumnor Parish residents by Neighbourhood Team members during the development of the Plan. It should be noted that following the original comments received from Cumnor Parish Council some changes were made to the text of this paragraph to more closely reflect the two-way nature of connections between the two parishes.

Respondent 4 (ID 112055636), Vale of White Horse District Council:

Brief summary of comments	Response / remedial action
Ref 1 (para 4.1.3.2.2), repeat of the word 'in'.	Typo. Agreed that it should be removed.
Ref 2 Policy HS6 not believed to be implementable as currently phrased. Wording should be revised to be more supportive.	Previous advice from the Vale noted that any guidelines for proposed housing developments on land released from the Green Belt subsequent to adopting the Neighbourhood Plan would be superseded by the detailed urban design principles then imposed by the Vale. Following those comments the Policy was reworded to take that into account and the next advice received from the Vale

	<p>suggested that the current wording was more acceptable to them. This response from the Vale appears to be reversing the advice. If it were to be agreed that the Policy could simply suggest guidelines for housing proposals on land subsequently removed from the Green Belt (in addition to housing in Conservation Areas), as detailed in the two bullet points, and that the Vale would note these points in drawing up any urban design principles for that area then the whole policy could be rephrased in a simpler, more supportive format. It would be possible to remove much of the wording in the current first sentence, and to relocate the second half of that sentence (from 'VOWHDC are strongly encouraged ..' onwards) to the supporting text in paragraph 4.1.4.6 section 8.</p> <p>A rewording of the second bullet point to state that such development 'would be supported' if the guidelines were to be implemented rather than stating that these guidelines 'should be implemented' would be acceptable.</p>
<p>Refs 3 (para 4.2.1.9), 4 (para 4.2.2), and 7 (para 4.3.2) propose removing references to the 2012 NPPF and the 'emerging' NPPF.</p>	<p>Agreed. Similar references had already been removed from other sections before submission, however these references were missed at that stage.</p>
<p>Ref 5 (para 4.2.3.2.2) and Policy EE3. Criterion a considered unenforceable, criterion e has an extra 't' in the word 'nett', and concerns over the wording of para 4.2.3.2.2.</p>	<p>We agree to the correction of the spelling of the word 'net' in criterion (e).</p> <p>Regarding the protection of these sites for business use by encouraging an increase in the area of useable employment floor space and not allowing any reduction in such space, we believe that we are imposing justifiable and appropriate restrictions to avoid their conversion to housing or other uses.</p> <p>In terms of criterion (a) we do not understand why it is now considered unenforceable as this was not previously considered to be the case in terms of previous advice provided by the District Council. The need for short term and small units has been identified by the Vale's own Economic Development Team in addition to other local business people. It should be noted that only one of the five criteria would need to be met by a developer, not all five, and therefore we do not feel that their inclusion would be too onerous on either the developer or the District Council.</p>

	See also the response from the Neighbourhood Plan Team to comments made by the District Council in the Jun-Jul 2018 consultation as these still remain valid. We note that the Independent Examiner has not raised any issues relating to this Policy.
Ref 6 (para 4.3.1.6) incorrect reference to Map 2 in Appendix B (which should read Map 2 in Appendix D).	Agreed that the wording should be corrected to show 'Map D.2 in Transport Appendix D of this document'.
Ref 8 (Policy TR2) bullet point 3 not considered viable as currently worded.	We fail to see how requiring provision for charging electric vehicles on site is "not viable", and believe that the wording should remain as currently. Many existing house holders manage this easily for slow charging, with an extension from their domestic supply. The Policy does not require facilities for rapid charging, which could have implications for domestic power supplies.
Ref 9 (Policy UT2) concerns over whether there is sufficient evidence to support a 40% reduction in carbon emissions.	See the response to the Independent Examiner's comments on Policy UT2 in Part 1 of this document.
Ref 10 (Policy BU1) considered too onerous to Oxford Brookes University, and could also benefit from being made shorter.	We accept that the Policy might benefit from being shortened, however we do not agree that the conditions placed on Brookes University would be too onerous. Local Plan Core Policy 9 already outlines most of the aspects contained within Policy BU1 as part of the requirements of a masterplan for the site. This Policy provides more detailed descriptions of the requirements which would be in line with the overall aims of this Plan, and the wishes of the local community. See also the response to the Independent Examiner's comments on this Policy in Part 1 of this document.

Respondent 5 (ID 112034926), Woolf Bond Planning:

Brief summary of comments	Response / remedial action
Map 1.2 showing current land use within the parish is considered inaccurate regarding indication of a plot of land in North Hinksey Village as being within the Green Belt. Also this map is considered to conflict with the Adopted Policies Map in the VWHDC Local Plan 2031. This is a repeat of a similar objection made in the final public consultation held by the Neighbourhood Plan Team.	Map 1.2 is correct in terms of the indicated boundaries of the Green Belt and will not need correcting. On 13 February 2019 VWHDC agreed to make a factual correction to the Adopted Policies Map for the Local Plan 2031 Part 1, relating to the boundary of the Green Belt at North Hinksey village and there is now no conflict between the two maps.

Respondent 6 (ID 112385442), David Wyatt (Individual):

Brief summary of comments	Response / remedial action
<p>Policy GS3 considered too restrictive and should be removed. Particular concerns with views VP3, VP11 and VP13.</p>	<p>The policy has been developed in consultation with the VOWHDC Planning department, and follows an approach recommended by the VOWHDC Landscape Officer. It seeks to protect the character of the parish, both urban, manmade and natural. We do not believe that there are grounds for removing this Policy in its entirety as suggested by this respondent.</p> <p>VP3: the landowner has now confirmed that the public is welcome to access this land on foot at any time and is pleased that the field and view are included in Policy GS3 of the Plan.</p> <p>VP11: is on private land & will be removed at current tenant's request, with appropriate amendments to be made to the Plan & Appendices in the final review process.</p> <p>VP13: our intention is that this view remains as a valued view across varied-use countryside including the Oxford Heights West Conservation Target Area & southern edge of Oxford city towards Chilterns AONB.</p>

Respondent 7 (ID 112654711), University of Oxford (submitted by agent – Barton Willmore):

Brief summary of comments	Response / remedial action
<p>Housing. Concerns regarding a lack of sites identified as suitable for development.</p>	<p>This is a repeat of the comment made by this respondent in the final public consultation run by the Neighbourhood Plan Team. As stated in the Plan (and supported by the District Council and other bodies) we do not believe that it would be appropriate to move away from our position of not identifying any significant areas of land suitable for housing. To repeat our previous comment in reply to this respondent: "Areas can be considered sustainable without containing any significant sized plots of undeveloped land that are suitable for housing, as occurs in this Parish. There is not an infinite supply of land, and following recent major housing developments it is considered that no further plots are available here for the reasons stated in the Plan, which is in line with the Local Plan. This will not block housing</p>

	growth through the placement of new housing as infill or redevelopment on sites already occupied by housing, as already occurs on a regular basis.”
The University states support for Housing Policies HS1 and HS3. In addition Policy HS5 is supported with a suggested minor rewording to the supporting paragraph 4.1.4.6 section 8.	We welcome the support for the three Policies (HS1, HS3 and HS5) and would be happy to amend the wording of the supporting paragraph 4.1.4.6 section 8 from ‘the local area’ to ‘North Hinksey Parish’ to match the wording in Policy HS5.
The University also states support for Transport Policies TR1 to TR5 with a suggested rewording of Policy TR2.	The proposed rewording would be acceptable if the Independent Examiner feels that it would be a beneficial change.
Policy UT2 is considered overly restrictive if applied to minor developments, and some rewording would be welcomed including the removal of reference to post construction evidence (section a (iii) of the Policy).	We disagree for the reasons outlined in our detailed response to the Independent Examiner’s comments in Part 1 of this document. It is interesting to note that the Higher Education Funding Council for England (HEFCE) set an initial target for universities to reduce their emissions by 43% by 2020 . https://www.edie.net/news/6/Universities-are-still-struggling-to-achieve-2020-emission-reductions-/
Maps G.2 and G.3 considered lacking sufficient evidence to justify their inclusion in the Plan, and being referenced in Policy GS2.	Information about local wildlife corridors has been sourced & verified from local residents during consultations and the Plan development period. It includes sensitive information about protected species that is held confidentially and will not be published publicly.
Recommend removing Policy GS3 as not properly justified.	Policy GS3 has been developed in consultation with the VOWHDC Planning department and follows an established methodology to assess views recommended by the Landscape Officer. The approach compliments current planning policy & practice. We do not believe that there are grounds for removing this Policy in its entirety as suggested by this respondent. We agree that the mis-labelled VP15 as VP16 on Map G.4 should be corrected.

Respondent 8 (ID 112657911), Gladman Developments Ltd:

Brief summary of comments	Response / remedial action
Policy HS5 suggested changes to wording to respond to changing needs.	It is noted in relation to all of these responses that this submission comes from a developer with no obvious interest in the parish who has not previously commented on the Plan. This

	suggested change in wording is not considered necessary.
Policy TR2 recommend remove reference to electric charging facilities.	We fail to see how requiring provision for charging electric vehicles on site is "not viable", and believe that the wording should remain as currently. Many existing house holders manage this easily for slow charging, with an extension from their domestic supply. The Policy does not require facilities for rapid charging, which could have implications for domestic power supplies.
Policy UT2 question justification of the 40% reduction in carbon emissions.	This is a Catch 22 situation – how can the Policy be tested anywhere if not first approved through the inspection process? We believe that this Policy is proportionate and viable, and has been fully justified. See the responses to the Independent Examiner in Part 1 of this document for full details.
Policy GS3 recommend removal of this Policy as unjustified.	Policy GS3 has been developed in consultation with the VOWHDC Planning department and follows an established methodology to assess views recommended by the Landscape Officer. The approach compliments current planning policy & practice. We do not believe that there are grounds for removing this Policy in its entirety as suggested by this respondent.

Respondent 9 (ID 112660046), Oxford Brookes University (submitted by agent - Turnberry):

Brief summary of comments	Response / remedial action
Para 2.2.7 incorrectly identifies Oxford Brookes as major landowners within the parish, as they are in fact long lease holders.	Agreed that this correction should be made.
Policy SI1 and Map 1.2 reference to Brookes Campus as a social infrastructure site is considered incorrect.	Within the Neighbourhood Plan there are a limited number of terms used to define land use, and these are listed under Map 1.2 (which also highlights areas within the Green Belt). These terms are housing, commercial, social infrastructure, and green spaces. On Map 1.2 (which is indicative only, and not used directly within any Policy) these last two categories are combined for the sake of clarity. Along with other educational establishments Oxford Brookes Campus is considered as social infrastructure, particularly as it also contains important leisure facilities open to the public. It should be noted that social infrastructure within this Plan also covers a wide range of

	<p>other sub-categories such as health care, the library, and religious establishments.</p> <p>It is not considered necessary that a further category or sub-category should be defined solely to cater for Oxford Brookes.</p>
Policy UT2 recommend removal.	<p>Legal arguments already addressed in the Plan, namely that a written ministerial statement in 2015 said that LPAs will continue to be able to set and apply energy efficiency policies that exceed Building Regulations in their Local Plans until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill. These amendments have not yet been enacted so the power for LPAs to set energy efficiency standards still exists. Plus see recent recommendations by Independent Committee on Climate Change as detailed in Part 1 of this document.</p>
Policy GS3 Recommends removal of VP11	<p>Justification for the inclusion of Viewpoint 11 has been provided in Appendix G, Table G1, relating to its positive landscape features. However, in recognition that the current tenant of this private land has queried the inclusion of the viewpoint it will be removed from the Plan.</p>
Policy BU1 concerns over the boundaries / footprint descriptions and the 20% limit to increase in numbers travelling to the campus.	<p>Policy BU1 in the previous version (as used in the final 2018 public consultation) included in section (d) the requirement to restrict development to the current built footprint of the campus, however this was amended following subsequent discussions with representatives of Turnberry (Brookes University's agents) in November 2018. The revised (current) version as submitted for Independent Examination contained the revised wording 'the major development site boundary of the campus as indicated on the Oxfordshire County Council Map of the site included as Map H.1 in the Appendices of this document' as use of this map was suggested by Turnberry representatives. It was understood at the time of submitting this Plan that the revised wording was more acceptable to Brookes as it was less restricting than the previous wording, and clearly defined through inclusion of this map. We would not be averse to also amending the wording of the first bullet point of section 4.7.3.1 to clarify the</p>

	<p>phrase 'current footprint' by referencing the major development site boundary and Map H.1 there as well as in Policy BU1.</p> <p>We do not feel that Policy BU1 conflicts with Local Plan Core Policy 9 on Harcourt Hill Campus or Core Policy 13 on the Green Belt. See also our response to the Independent Examiner comments on this Policy in Part 1 of this document.</p> <p>Regarding the numbers of students and staff travelling to the campus rather than living on the campus and studying/teaching there, this is a subject which has been at the centre of discussions with Brookes University representatives since the beginning of the Neighbourhood Plan process. Potential problems caused by additional traffic on the surrounding minor local roads was clearly highlighted as one of our major concerns very early on. We were advised that it was also the intention of Brookes to minimise travel between the various Campuses by more intelligent assignment of courses being taught at the various sites combined with accommodation for those students primarily being on the same site. That approach, which we assumed would be incorporated within a revised masterplan, coincided very closely with our own. A significant increase in student numbers in order to maintain the viability of the site could easily be achieved whilst limiting the increase in numbers travelling to the site to under 20%, and this level is considered by us to be a reasonable restriction. Any larger increase would definitely have a noticeable negative impact on local traffic flows.</p>
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Respondent 11 (ID 113076740), Oxfordshire County Council:

Brief summary of comments	Response / remedial action
<p>Recognition that most of the comments made by the County Council in the final consultation run by the Neighbourhood Plan Team have already been incorporated. Also there is general support stated for the Plan as a whole, and recognition that no further sites for housing need to be allocated.</p>	<p>These comments are welcomed, and reflect the responses made by the Neighbourhood Plan Team to the previous consultation submissions by the County Council.</p>

<p>Policy UT2 states support for the energy efficiency elements within the Plan, and refers to similar objectives in the Oxfordshire Energy Strategy, which has only recently been published.</p>	<p>We welcome the support for Policy UT2 from this respondent, and their comments that the ambition fits clearly with the objectives in the Oxfordshire Energy Strategy (Nov 2018).</p>
<p>Policy GS2 recommend adding further green spaces as listed.</p>	<p>This clarification of locally designated sites is extremely helpful and our intention is that the relevant information will be incorporated into the appropriate Green Spaces policies and supporting information during the final review process. Further advice on this matter will be sought from the District Council Planning Department.</p>
<p>Community Action CAET1 (incorrectly referred to as a Policy) suggested rewordings.</p>	<p>Regarding the suggested rewording of part (a) bullet points 2, 4, and 5 we do not feel that these would be appropriate. As this is a community action, and not a Policy, the targets currently included reflect our aims. We recognise that those aims would be subject to a satisfactory business case being produced, but that does not stop them from being our aims, and a clear guide to our intentions should funding become available. Likewise this also applies to the suggested rewording of parts (c) and (d). We would not want to include wording that suggests the transport solution is known before we have actually completed the measurement tasks needed to define the scope of the task. By focusing upon 'Bus solutions' the community believes we are potentially missing out on the advantages of other transport solutions that are available in the market. We are aware that other councils around the country have been ambitious when looking at transport needs and solutions and we believe the Botley Road corridor offers similar substantial opportunity. It is possible that the county is unsure whether it has the resources to complete such a comprehensive review, however, the community does have the demographic profile that could make a meaningful contribution if a partnership with the community was sought. The people within North Hinkley not only have the skills, but seeing as many are retired, we also know they have the experience. On this and many other matters, the council should be encouraged to consider how the community can help build creditable business plans to deliver upon these opportunities.</p> <p>Part (b) we would not be averse to removing the word 'preferably' as suggested.</p>

Councillor David Kay

May 14th 2019

Chairman, North Hinksey Parish Council and Neighbourhood Plan Team