

Cumnor Neighbourhood Plan

Regulation 14 consultation responses requiring further consideration

September 2020

The Cumnor Parish Neighbourhood Plan Steering Group first considered the responses to the Reg 14 consultation at its 18th February 2020 meeting, 4 days after the consultation closed on 14th February 2020. Minute 14/20 from that meeting states:

14/20 Regulation 14 Pre-submission Consultation.

- i. The consultation ended Friday 14 February 2020 at 5pm. 112 responses were received, 2 from outside the parish and 2 (VWHDC and 1 resident) were received after the formal closing time. The Group agreed that responses received up to the start of the meeting would be accepted.

Action: to confirm whether residents' responses from outside of the parish can be considered. *(Clerk's Note: yes they can.)*

Tim Pottle had circulated a spreadsheet listing responses on each policy submitted via the website and reminded the Group that as the document contained personal details it must not be circulated outside of the Group. The Clerk had collated other responses received via email or letter into a word document.

Action: Chris Westcott to include these responses into the spreadsheet for ease of analysing.

Letters received from VWHDC and OCC would not yet be included within the spreadsheet. **Action:** Judy Roberts to consult with VoWHDC and OCC to understand exactly the points raised in the responses and report back to the Group at its next meeting.

Action: to confirm whether it is mandatory that responses are published and what is best practice. *(Clerk's Note: it is not mandatory to publish responses. There has to be an open and transparent process so when writing the Consultation Statement it is required to demonstrate who was consulted, how, summaries responses and show they were addressed.)*

- ii. Chris Westcott gave a brief overview of the key themes emerging from the responses.

Local Green Spaces Policy - 2 organisations were against designation of specific spaces and a matter of whether parking would be permitted on a proposed space if it was to be designated was raised. The majority of responses agreed that the spaces proposed LGS should be designated. Judy Roberts informed the Group that LGS have the same protection as GB and parking was permitted within the GB.

Action: Judy Robert to clarify Nobles Close parking issue

Quite Area Designation Policy - 1 organisation was against specific areas being designated. The vast majority of responses thought designation was a wonderful idea. The areas proposed were all within the DEFRA identified agglomerations. The requirements for designating Quite Areas are that they have to be identified as LGS's in the relevant Local or Neighbourhood Plan.

Design and Built Character Policy - the vast majority of respondents were pleased with the policies and praised the Group. VWHDC raised lots of points which included using the word should instead of must and that the draft policy might be restrictive.

Action: Judy Roberts to explore further with VWHDC their reasons for stating that the word 'must' would need to be changed to 'should'.

Residential Development Policy - majority of comments were positive. VWHDC raised lots of points which included using the word should instead of must and that the policies might be restrictive.

Rural and Natural Environment Policy - received the most comments with the vast majority being positive. VWHDC said that important views cannot be identified outside of the designated neighbourhood area. Judy informed the Group that sites could be designated as Wind

and Solar Farms.

Employment, Business and Employment Facilities Policy - least responses but all positive.

Transport and Infrastructure Policy - positive comments for the cycle path. OCC did not agree with comments regarding the bus services.

Community Actions - majority of responses were supportive.

Overall comments.

Vast majority of responses were positive of the plan and praised the work of the Group and Fiona Newton. Specific comments and objections were received from some stakeholders.

The Group would review the responses and AGREED to pass on any contentious or technical responses to a third party with the brief that amendments would stay true to the weight of the draft NP and its extensive evidence base. Any amendments would be tracked so that the evidential process used so far could be maintained. Council had approved expenditure of £1,000 for commissioning a third party.

Action: Once all responses had been entered into the spreadsheet by Chris Westcott, Tim Pottle would add an extra column titled Further Examination Required, yes or no. This would be for positive or negative comments that need to be looked at by the Group or third party. The members listed in iii would complete the relevant section of the spreadsheet.

Action: Dianne Rees would look at a residents detailed comments and add them with track changes into the draft NP for consideration at the next meeting.

Action: Chris Westcott to send Dianne Rees the word version of the draft NP.

- iii. The Group AGREED to look at the responses on the following policies and complete the spreadsheet accordingly by the next meeting:

Local Green Spaces - Tim Pottle.

Quiet Area Designation - Tim Pottle.

Design and Built Character - Kathy Davies.

Residential Development - Diane Rees and Chris Westcott.

Rural and Natural Environment - Judy Roberts.

Employment, Business and Employment Facilities - Ted Mott.

Transport and Infrastructure - Chris Scruby.

Community Actions - Chris Westcott.

- iv. The Group deferred making a decision on options for appointing a third party to draft a Basic Conditions Statement.

- v. **Actions:** Chris Westcott to write an article to update Council, the distribution list and Cumnor Parish News on the results of the consultation and what would happen next.

Those minutes were received by Cumnor Parish Council at its 2nd March 2020 meeting (minute 88/20)

The Steering Group continued its assessment of the Reg 14 responses at its next meeting on 17th March.

During the subsequent Covid 19 ‘lockdown’ it was not possible for the Steering Group to meet until appropriate legislation on virtual council meetings was passed. The Steering Group next met to carry on its work on 9th June 2020 and the 9th July 2020.

The rest of this document contains the content of Paper 2 of the Cumnor Parish Neighbourhood Plan Steering Group agenda of 13th August 2020, approved on that date (minute 42/20).

As such this document contains all the responses to the Cumnor Neighbourhood Plan Regulation 14 consultation that the Steering Group believed required further consideration: potentially leading to either no change in the Parish’s draft Neighbourhood Plan document, an addition, a subtraction, or some other change.

Each response is numbered for easy reference and, where appropriate, the statutory body commenting is identified in the third column. The fourth column is the Steering Group’s decision on whether the Steering Group itself could handle the consideration of the response (shown as NBP), or whether it was best handled by an expert working for the Group on behalf of the Cumnor Parish Council (shown as an X), as discussed and agreed at the Steering Group’s February 2020 meeting.

As a short summary the table below (Table 1) shows the number of responses requiring further consideration by policy area and the decisions by the Group of how many it could consider itself and how many it believed best to enlist additional expert help with.

Finally, at the end of the document (page 72) is appended the Vale of White Horse District Council (VoWHDC) response in full as it was the most comprehensive of those received from the statutory consultees. Although individual VoWHDC responses are also inserted into the relevant policy sections in the main tables the Steering Group considered it helpful to additionally show the VoWHDC 17th February 2020 response in full as it also contained a number of ‘non policy’ comments.

Paper 2 of the Cumnor Parish Neighbourhood Plan Steering Group agenda of 13th August 2020

Policy Area	NBP responder	# of responses requiring further consideration	of which can be considered by the Cumnor NBP Steering Group	of which should be considered by additional expert help
Local Green Spaces – page 5	TP	9	8	1
Quiet Area Designation – page 10	TP	10	8	2
Design & Built Character – page 13	KD	16	7	9
Rural & Natural Environment Policies – page 28	JR	13	9	4
Residential Development Policies – page 32	DR & CW	14	8	6
Employment & Community Facilities Policies – page 41	TM	11	8	3
Transport & Infrastructure – page 46	NC & CS	13	11	2
Community Actions – page 58	CW	7	7	0
	TOTAL	93	66	27

Table 1

Para below added post 09062020 NBP meeting

Reflecting discussion that the Reg14 consultation concluded before the Covid-19 pandemic led to profound social, economic and governance changes

From the minutes of the 9th June 2020 Cumnor NBP Steering Group

The Group discussed how to include the impact of Coronavirus on aspects of the draft plan, including emphasis on the importance of green spaces, allotments, gardens, broadband, footpaths, cycle lanes, (home) office space, travel and roads and how to address this in the plan.

Action. Chris Westcott to contact Robyn Tobutt, Community Engagement Officer, VoWHDC to ask to be kept abreast of any advice on how best to reflect the impact of Coronavirus within the plan without the need to go back to another Regulation 14 consultation. **DONE see Paper 2 on 09072020 Agenda**

Local Green Spaces

LGS -R1	<p>Myself and my neighbour have been liaising since 2016/2017 with the VOWH D.C, Sovereign, Oxfordshire County Council, Nicola Blackwood, Layla Moran, Judy Roberts to try and get existing grasscrete bays and paths maintained and additional parking bays added (A petition to support this has been signed by all of the other residents living here and we are having a residents meeting on Sat 8th Feb in Dean Court community Centre to which Judy Roberts will be attending. Can you advise if this will affect providing additional parking bays?</p> <p>Can I also point out that the info on Nobles Close is incorrect and as follows:</p> <ol style="list-style-type: none"> 1) It states that the properties are for "over 55's", there are some younger people here and young families nowadays. 2) It states that "it's crossed by drives to homes" but that unfortunately isn't the case otherwise residents would not be requesting additional parking. 3) It states that "for residents to walk an see from their homes especially if housebound". If a resident is housebound, how on earth would they be able to walk and enjoy the area. None of the bungalows have their lounge at the front of the property (it's all bedrooms) so they would be sat in their lounge looking into their garden and NOT the front area. 4) It states that "It provides an important open space to meet other residents". I have never know this to 		NBP	JR liaising with residents – include in LGS review – for consideration at 13082020 NBP meeting
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	<p>happen in the 9 years I've been resident here and I'm sure my neighbour, Gill will confirm this (she has been resident here for nearly 30 years).</p> <p>5) It states that "it provides a sense of openness and space". whoever took the photo has not been in the Close of an evening or weekend when residents are home or not at work when it's full to bursting with residents vehicles and a caravan?</p> <p>I note on your website it advises that the Parish news is distributed to 1600 homes, none of which are in Nobles Close when you one of your "green spaces" are proposed.</p> <p>I note the only reason to make it such is for it's "tranquillity", really don't think it can be called as that when you can hear the hum of the A420 24/7</p> <p>I will copy and email this to yourselves directly and attach photo's which reflect the true picture of the Close</p>			
LGS-R2	I suggest the first line of paragraph 127 be amended to read: "There are 56 public footpaths across the Parish, which provide a high level of connectivity, except for those crossing the A420, where connectivity has been severely impacted by the road."		NBP	noted
LGS-R3	As note 57 shows, many local green spaces have multiple benefits and the principle of upholding community value when considering any changes is critical. As demand for development continues upward, it is very important that existing local green spaces (LGS1) continue to serve their core function of		NBP	Noted and check against proposed revised policies developed in collaboration with OneillHomer

	amenity to the community. Regarding LGS2 there may be some interpretative tension between 'enhanced use' and 'community use'. Is LGS2 written to be explicit that both 59i and 59ii must hold? I might write it that unless condition 59ii is upheld, then grounds under 59i cannot be considered.			
LGS-R4	It would be good to promote the use of the existing green spaces. Some are well known: e.g. the Closes Field football pitches but the nature reserves almost opposite are not. It would have been good to include a statement advising against the sell-off of land from school playing fields. There is no specific mention of the rumoured sell-off of land by the cricket club.		NBP	noted
LGS-R5	I think these spaces are very important to the local communities they serve and it is really important to protect them. LGS1 sets out where the spaces are and LGS2 provides a robust description of how the spaces should be protected. I understand the need to protect the ability of schools to expand but equally think the majority of their green space should be protected.		NBP	noted
LGS-R6	The inclusion of all these sites has clearly been well researched and it certainly reflects my own appreciation of Cumnor and that of my family. 57. Could The Closes also tick boxes for wildlife, as there is diverse wildlife using this space. A lesser spotted woodpecker can often be seen in the trees, for example, which is one of the rarer wildlife visitors. As a dog walker on The Closes, I would also support		NBP	noted

	the view that this is a tranquil area; could that box also be ticked?			
LGS-R7	Paragraph 56 and Policy LGS2. I think that omitting school playing fields from designated local green spaces would be dangerous. The County Council as education authority is known to favour the sale of parts of school sites where possible, usually for housing, in order gain a capital receipt. As the concern described in paragraph 56 is that designation as a local green space would prevent a school's ability to expand then that should be covered by an additional proviso to Policy LGS2, eg "iii. in the case of a school site the development would be for school or education purposes."		NBP	Noted but explicit decision as otherwise Cumnor Primary School couldn't expand if needed
LGS-R8	<p>However, as indicated above, the University objects to the proposal to designate the allotments off Tilbury Lane (Site Ref: LG10) as a Local Green Space, in particular as this site has also been identified as a 'Community Asset' within the Plan and is protected from inappropriate development by draft policy EBC2. Furthermore, the University considers that the recreational benefit of these allotments has been over stated within the supporting Local Green Spaces report as indicated by the consistency between the assessment of the site in this report and what is indicated within the Landscape Character Assessment and that there is a lack of evidence to identify that the allotments are demonstrably special to the community. On this basis, the University considers that the allotments of Tilbury Lane should be removed as a proposed Local Green Space from draft policy LGS1. Furthermore, as the two are intertwined, the University also consider that this site cannot be designated as a Quiet Area Designation under draft policy QA1.</p> <p>Furthermore the University consider that the Fogwell Road Sports Pitch & Play Area should be removed from draft policy LGS1 as a proposed designated Local Green Space, as it already has sufficient protection from inappropriate development as it lies within the Green Belt and is also identified as a Community Asset within the CNP.</p>		NBP	Noted for LGS review in 13082020 meeting
LGS-R9	It is only necessary to have one policy on Local Green Space Designations, we recommend that you combine Policy LGS1 and LGS2. The policy should comprise a list of the Local Green Space designations; whilst table 3 is a good resource and we would encourage the inclusion of it in the plan, it is not necessary to have this level of detail in the policy	VoWHDC	X	

	<p>text, it might be more appropriate in the supporting text.</p> <p>We recommend that the policy makes direct reference to the maps, for example:</p> <p>The Cumnor Parish Neighbourhood Plan designates several Local Green Spaces at the following locations:</p> <ul style="list-style-type: none"> i i) Farmoor Village (Map 2) ii ii) Cumnor Hill and Dean Court (Map 3) iii iii) Cumnor village (Map 4) <p>We recommend you change 'must' with 'should' to give the policy the required flexibility.</p> <p>We note in your Local Green Space report you have set out all the landowners consulted against each of the sites. However, please be aware that sites may have multiple landowners, for example Vale of White Horse District Council has been identified as the landowner for LGS3, however the land identified is only in part owned by Vale of White Horse District Council. We also note that you have received objections from landowner/s, the NPPG sets out that landowners should be consulted at an early stage and whilst there is no requirement to remove a Local Green Space if a landowner does not agree, it might be worth strengthening the explanation against the NPPF criteria.</p> <p>Our attention has been drawn to LGS4, as this is an area which has been of particular local interest due to the parking on site. Whilst the parking areas appear green, with a grasscrete type surface used for parking, the area proposed to be designated looks to</p>			
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	<p>be a mixture of parking and green space. The NPPF clearly sets out the tests for Local Green Spaces, which will be considered in the examination of the neighbourhood plan. If the examiner does not think the proposed area meets the NPPF tests, they may recommend that it is removed from the plan if it does not meet the tests. Therefore, it may be more appropriate to exclude the parking areas from the Local Green Space Designation to mitigate this risk.</p>			
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Quiet Area Designations (LQA1-2)

LQA-R1	The overbearing noise from the A420 makes a mockery of the Dean Court 'Quiet Areas'.		NBP	noted
LQA-R2	Fogwell Road can't be really quiet with the A420 so close. Could there be a 50mph speed limit on this part of the road? This would also help with emissions. More trees on the edge of the road also a good idea, they do mop up both emissions and noise.		NBP	Noted but outside NBP remit
LQA-R3	Good idea, could be more areas		NBP	noted
LQA-R4	Adjacent developments have led to significant increase in commercial and construction traffic through Cumnor village. Glebe Park (QA4) is at the heart of the 'rat run' and this is a good way of selecting a relatively small area for effective mitigation. Regarding QA2, if development detracts from tranquility, is the policy that a) it will not be supported AND b) mitigation measures must be offered? Or is it that with appropriate mitigation, development that detracts from tranquility could be supported? Some qualification of what the minimum effect of the mitigation measures need to be, may be useful.		NBP	Requires further thought
LQA-R5	I think that the biggest threat to this comes from road traffic. What will be done to reduce heavy goods traffic through Cumnor?		NBP	noted
LQA-R6	Given that noise seems to increase year by year are we sure that we can't identify more quiet areas and/or increase their area?		NBP	noted
LQA-R7	I agree. Is Closes Filed not a Quiet area when the Club is not using it ?		NBP	agree
LQA-R8	Policies QA1 and QA2 are supported, but the biggest threat to 'quiet' in the parish is noise from aircraft on approach and take off from RAF Brize Norton. The agreed flights paths of these aircraft were understood to require no flying over Cumnor village, Farmoor, Dean Court and Cumnor Hill, but this is not observed.		NBP	Requires further thought

	Although not something that can be controlled by planning policies, I think it should included in the the list of matters on page 63 that the Parish Council intends to pursue.			
LQA-R9	<p>Quiet Area Designation (draft policy QA1)</p> <p>The allotments at Tilbury Lane also fall under the Quiet Area Designation under draft policy QA1 based upon DEFRA's Noise Action Plan: Agglomerations (Urban Areas) Environmental Noise (England) Regulations 2006, as amended, published last year. Based upon these regulations, a site can only be considered a Quiet Area Designation if the area is identified as a Local Green Space. Draft Policy QA2 states that development which detracts from the tranquillity of the designated quiet areas will not be supported. Paragraph 57 of the Draft Plan confirms that the allotments do not constitute a space that is of tranquillity.</p>		X	
LQA-R10	<p>Having reviewed the 'Noise Action Plan: Agglomerations (Urban Areas) Environmental Noise (England) Regulations 2006, as amended – 2 July 2019' and map showing agglomeration areas, we can see that an area of Cumnor is within this. In line with your supporting text this document sets out how eligible local authorities are able to nominate approved Local Green Spaces, delineated in Local or Neighbourhood Plans, for formal identification as Environmental Noise Directive quiet areas. The document clearly sets out the process:</p> <p><i>'Nominations should be submitted to Defra using the application form at Appendix D, and will be assessed by Defra using the criteria set out in Appendix D. The application form requests information about the location of the proposed quiet area, as well as details regarding the attributes of the space and how the local authority intends to maintain the quietness.</i></p> <p><i>Having reviewed the applications, Defra will formally identify a selection of the nominated spaces as quiet areas, as long as the relevant criteria have been met.</i></p> <p><i>Defra will then publish details of any quiet areas that have been formally identified in an appropriately accessible format.'</i></p> <p><i>'In order to be considered as a potential quiet area, a nominated space will first need to have been designated as a Local Green</i></p>	VoWHDC	X	

	<p><i>Space in the relevant Local or Neighbourhood Plan, with tranquillity being a factor in its designation.'</i></p> <p>Having reviewed this document it is clear that a quiet area designation is linked to Local and Neighbourhood Plans through Local Green Space designations, but that the process is something that is not done by planning policy, as an application needs to be submitted to Defra. The Local Green Space designation needs to be in place to enable the quiet area designation to take place. It therefore does not appear to be something that can be done through the neighbourhood plan directly, although the neighbourhood plan plays an important role in the process. On this basis, whilst the neighbourhood plan can recognise that parts of the neighbourhood area are subject to the Noise Action Plan, it is not the correct mechanism to designation areas as quiet areas in neighbourhood plan policies, therefore we suggest that this policy is deleted and modified into a community action. The application for quiet area designations should take place once the neighbourhood plan Local Green Space designations are in place.</p> <p>In addition the quiet areas application form states: <i>'Please note that the nominated space must fall wholly within the agglomeration boundary to be considered for formal identification as a quiet area by the Department for Environment, Food and Rural Affairs'</i>.</p> <p>Some of the areas identified are outside the agglomeration boundary and therefore would not meet the requirements.</p>			
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Design & Built Character Policies (DBC1-6)

DBC-R1	<p>...</p> <p>Policy DBC5: Infill in the Green Belt</p> <p>It is useful to have a definition of “infill” that the Vale of White Horse DC can practically use in future planning applications. It would be helpful to specify a maximum number of dwellings or to specify that the infill must only occur between active frontages.</p>		X	
DBC-R2	<p>...</p> <p>We broadly support the aims of the plan. But have a significant concern about the interpretation of proposed policy DB6: Conserving and Enhancing Non Designated Assets. We feel it could have unintended consequences arising from its unclear evidence base, out of date references and the inclusion in the associated local list of heritage assets of the proposed “Lower Cumnor Hill and Third Acre Rise local conservation area”.</p> <p>As you will be aware the proposed policy DB6 would mean that any development in the local conservation area, not just affecting specific houses named in the local list, would have to ensure that any:</p> <p>“Development proposals affecting non-designated heritage assets, including their setting, should conserve or enhance their architectural, archaeological, historic or artistic interest.</p> <p>Alterations and extensions to non-designated local heritage assets must complement their architectural,</p>		X	

	<p>archaeological, historic or artistic interest and original features that contribute to that architectural, archaeological, historic or artistic interest.”</p> <p>That would therefore have the effect of limiting the scope for the houses of less heritage interest from being able to modernise or adapt to respond to climate change, or changing family needs as nearly all of the houses in that area have done over the years (see details, evidence and analysis below).</p> <p>The evidence base for the plan does not give a clear justification for imposing this policy across the local conservation area, so could be challenged as unsound. Further the associated policy wording is unclear and open to far too wide an interpretation as explained below.</p> <p>We have therefore suggested below an amended policy/interpretation wording to address those concerns whilst still meeting the presumed intentions. These changes are to:</p> <ul style="list-style-type: none"> • reflect the current NPPF, • define how properties are nominated for the local list of heritage assets; and • instead of proposing an unclear/unjustified policy for a local conservation area which would be difficult to use to assess development proposals, include specific properties in that area in the local list of heritage assets. <p>We’d suggest that these changes would strengthen the proposed policy.</p>			
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	<p>Analysis of proposed policy DB6 wording and interpretation text</p> <p><i>Proposed policy DB6 wording & interpretation paragraphs:</i></p> <p><i>Development proposals affecting non-designated heritage assets, including their setting, should conserve or enhance their architectural, archaeological, historic or artistic interest.</i></p> <p><i>Alterations and extensions to non-designated local heritage assets must complement their architectural, archaeological, historic or artistic interest and original features that contribute to that architectural, archaeological, historic or artistic interest.</i></p> <p><i>Interpretation:</i> <i>118. This relates to non-designated heritage assets identified on the local list of heritage assets; heritage assets identified on the Oxfordshire Historic Environment Record and features identified as being of local interest in the Cumnor Conservation Area Appraisal 2011, Vale of White Horse District Council.</i></p> <p><i>119. The list of local heritage assets is contained in the Cumnor Parish Local List Report. These have been assessed in accordance with the methodology set out in the Oxford Heritage Asset Register and based on criteria set out in the NPPF, July 2018.</i></p>			
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	<p>It is noted that whilst the local list of heritage assets has been included in the plan, comment on the list is not specifically sought, and the list was not subject to any separate consultation exercise. So this is the only opportunity afforded to comment on the list.</p> <p>The interpretation section states that the list was prepared “in accordance with the methodology set out in the Oxford Asset Register”. That methodology is set out in: www.oxford.gov.uk/downloads/file/1919/introducing_the_oxford_heritage_asset_register</p> <p>Yet, no evidence is presented on how the methodology has been followed in the Cumnor case. Unlike in the Oxford methodology, the Cumnor list has not been subject to separate consultation.</p> <p>Unlike on the Oxford Methodology, the Cumnor approach does not define the terms used in the proposed policy, therefore leaving them open to interpretation and an unclear approach to inclusion. Unlike the Oxford methodology a new “untested and undefined” approach is included for a local conservation area. The suggested proposed policy (see attached nomination form) addresses that concern by using the wording in the Oxford methodology.</p> <p>Unlike the Oxford methodology key features that should be considered in assessing proposals are not defined. This could be addressed by linking the to the character</p>			
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	<p>assessment to identify features such as view cones into the local conservation area that need to be preserved. We would suggest that one key view cone would be the need to preserve the “undeveloped views” from the west towards Dean Court. That rural approach into the Parish is a key characteristic of the area.</p> <p>The methodology refers to NPPF July 2018 but is unsound as doesn’t refer to any justification on the sections and since July 2018 the NPPF has been updated. The proposed methodology should therefore reflect NPPF2 (2019) section 16 paragraphs 185 and 186 in particular. The proposed policy interpretation paragraphs should be amended to have regard to paragraphs 189 to 192 and 197 in particular:</p> <p>Proposals affecting heritage assets 189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field</p>			
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	<p>evaluation.</p> <p>190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.</p> <p>191. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.</p> <p>192. In determining applications, local planning authorities should take account of:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. <p>197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or</p>			
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	<p>loss and the significance of the heritage asset.</p> <p>Analysis of the proposed inclusion of the Lower Cumnor Hill and Third Acre Rise local conservation area</p> <p>The intent of including a new untried category of a “local conservation area” is incompletely defined and therefore unjustified and unsound. Whilst we could make presumptions about the intention of its inclusion, those could be wrong and the lack of a policy and interpretation framework means that its inclusion into the local list of heritage assets could lead to confusion over assessing proposals.</p> <p>The effect of that confusion could lead to adverse consequences on the vitality and viability of the housing in the local conservation area. As evidenced below, the properties in the area have nearly all been adapted and changed to meet needs over time. That is not reflected in the evidence base for the policy. The linking of the local conservation area to policy DB6 would be likely to place an impediment to such changes thereby having the unintended consequence of adversely affecting the area’s amenities.</p> <p>It isn’t clear why instead of proposing the local conservation area, the particular buildings of heritage value were not just included on the local list of heritage assets. That would have had the effect of clarifying the interpretation of the policy and the assessment of any development proposals. It is therefore recommended</p>			
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	<p>that is considered instead. The policy wording would limit the extent which proposals for other nearby properties could impact on those heritage assets (for example through intensification of development). Such an approach would better accord with the heritage policies in the adopted VoWH Local Plan.</p> <p>It should also be noted that whilst the supporting evidence for the local conservation area's value is a good start, it fails to address a number of factors, so is incomplete. A summary of these factors is listed below for the Third Acre Rise element as an example:</p> <ul style="list-style-type: none"> • The houses on Third Acre rise were developed in four phases, yet they are treated as one in the proposed local conservation area without any clear justification. We have the evidence to demonstrate that fact, but don't have the copyright for some of the material, so can provide that on request. • None of the properties in Third Acre Rise have remained as originally constructed. • They have all been adapted and many extended (especially those on the western side) to meet changing household needs / incorporate more sustainable features such as double glazing, solar panels etc. • Significant new builds and alterations have occurred in the area including: division into flats (number 2), solar arrays (number 3, 20), extensions (number 3, 5, 9, 10, 20, 14, 17) a replacement dwelling (number 11), 1960s and later builds (numbers 12, 22 and 24), loft conversions (numbers 14, 16, 19), plus a wide range of other alterations such as most having replacement 			
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	<p>windows.</p> <p>As such the justification doesn't accord with the standard reasons for designating a conservation area and as the purpose and interpretation of the "local" version of that designation are unclear, that should be rejected as a proposal as well. It would therefore be more appropriate to identify key local heritage assets to assist in assessing development proposals against any harm.</p> <p>The form will be sent via email to the Parish.</p>			
DBC-R3	<p>It is good to see the key extracts from the Vale's Design guide included in this plan. I am especially encouraged by the detail in DBC1. However I would prefer if it referred more specifically to the relationship of any development to the immediate vicinity rather than a more general reference to the character of the whole parish. The development of buildings out of scale to the plot area has been a concern and so the comments on plot coverage are helpful but wonder whether this could be more specific rather than a general statement of the relationship.</p> <p>Very pleased to see the details in DBC 4 which are very welcome. One particular concern in my area is development on significantly sloping sites where building levels relative to adjoining properties are a key factor. Several development have been submitted without any specie data on floor levels relative to neighbouring plots and I would like to see this as mandatory.</p>		X	

DBC-R4	DBC5, Paragraph 114: What is the definition of "washed over" Green Belt?		NBP	"villages within a designated green belt which are not subject to specific proposals to extend the village boundary for development. (Planning portal)
DBC-R5	A comprehensive set of policies covering all areas of the Parish and reflecting their different characters although I'm not sure why the 'top' of Cumnor Hill is not in the low density area as the density of house here is clearly less than some areas that are colour coded as low density e.g. the corner of Hurst Lane and Cumnor Hill. Surely there needs to be consistency?		NBP	There is considerable discussion over where to draw the line. There are inevitably some areas that are marginal.
DBC-R6	A great set of draft policies. I suspect that issues will need to be addressed where individual properties sit on or near the boundaries of areas where different policies apply		NBP	Agree – It will be the responsibility of the LPA to make a balanced judgement that respects the spirit of relevant policies
DBC-R7	A sympathetic view has been taken to these that is in keeping with the 'feel' of Cumnor now but also what Cumnor may need to look like in the future. The one reservation is around whether district council and other stakeholders will really lend them the proper weight in planning decisions given one recent case as an example. The Parish needs to be wary of arguments being bent to specific views and adjust to be able to defend the community appropriately.		NBP	The LPA is responsible for making decisions in accordance with approved policies and guidance which will include the neighbourhood plan, once approved. The LPA should demonstrate how a planning proposal accords with adopted policies.
DBC-R8	These seem ok, though the "2 storey" statements should not imply that single storey areas should allow 2 storeys.		NBP	This should be covered by DBC1, which requires development proposals to be 'designed in line with the spatial characteristics of the immediate site and context'.

DBC-R9	<p>Paragraphs 78 to 81, 90, 99 and 100 are welcomed as drawing attention to the importance of the Vale's Design Guide's Principles. Policy DBC1</p> <ul style="list-style-type: none"> i. The phrase "Scale, massing and height' needs to describe something. These words should be followed by "of buildings in the immediate locality" (or something similar) ii. The phrase "setback and enclosure to street frontages" is confusing as it seems to describe two different features. Presumably it means the setback of a building on its plot and the enclosure of the street scene with walls, hedges or fences. I think that these points would be better expressed as two separate points. iii. is very much welcomed as recognising the importance of maintaining the relationship between the size of a building and that of its garden or curtilage Paragraph 88. The phrase "setback" and "enclosure" (as commented on above) is also mentioned in this 'interpretation' section following Policy DBC1, but this wording is no clearer and should also be amended Policy DBC4. - Paragraph 105. This paragraph/policy sub-clause should also refer to the damaging effect that housing conversions of isolated rural agricultural buildings can have on the landscape by, for example, extended residential curtilages, car parking, garden sheds, washing lines, play equipment etc. This concern should be met by adding to the policy "and no damage is 		X	
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	<p>caused to the character of the surrounding landscape”.</p> <p>Paragraph 106. This paragraph/policy sub-clause is not a design policy and is also unnecessary as it duplicates Policy RES1. I think it should be omitted</p> <p>Paragraph 110. The second sentence of this paragraph is an important requirement but it is not specifically included in the policy. It should not therefore be in this ‘interpretation’ section, but should be included in the policy as an addition to sub-clause iii.</p> <p>Policy DBC5. The definition of infill in sub-clauses i. and ii. of this policy needs to be reworded to avoid misinterpretation. “Infill” is defined several times in different parts of the Plan and the wording is different in each case, even though it should be the same. The phrase “gaps between existing dwellings” (in this Policy) is too loose a wording as it could include larger gaps within settlements in the parish which should not be developed, especially in the Green Belt. This possible misinterpretation is supported by the reference only to “open paddocks” in sub-clause ii. The wording of the policy should be replaced with the long-accepted definition of infill as “a small gap in an otherwise built-up frontage” to avoid misunderstanding and there should be a cross-reference to paragraph 176 which gives an accurate and fuller explanation (see further comments on “infill” under Policy RES1 below).</p>			
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DBC-R10	Policy DBC 1. We suggest a cross reference to 176 to clarify the meaning of 'infill in'. In an area of diverse layouts the term could be misunderstood		NBP	Infill is defined on p.51 in relation to policy RES1 and cross referenced in the interpretation.
DBC-R11 See also RES-R8	The terms 'infill' and 'infilling' and phrases related to these occur multiple times in the Plan, with limited and imprecise forward referencing to RES1 (p. 50) and with a gloss in para. 176. Para. 85, re DBC1, for example, is unsatisfactory. Overall, the phraseology used is not uniform. Given the importance of infill development it is imperative that the meaning to be attributed to it should not be capable of multiple interpretations. For example, what weight is to be attached to the qualifying adjective 'limited'? On a positive note, it is good to see in Para. 176 that backland development is explicitly excluded from infilling.		X	
DBC-R12	More specifically, the content of Para. 110 should be promoted to Policy.		NBP	- para 110 – should read “the topography of sloping sites’. I think this requirement is included in general guidance of the VoWHDC including the Design Guide
DBC-R13	Policy DBC6 We strongly support the identification of non-designated heritage assets through the neighbourhood planning process and see this as an important opportunity for communities to secure consideration of the heritage they value most within planning decisions. As it is the policy wording that receives the greatest weight in decision making, we feel that the list identified in the planning process (recorded in the associated report) should be clearly identified in the policy and the list itself actually brought within the plan, potentially as an appendix. This has the advantage of ensuring that it is clear which properties or land the policy refers to, but does constrain addition to the list to the five year review cycle of the plan. This would not prevent the local planning authority identifying further non-designated heritage assets as part of their normal planning function. We would also suggest that	Historic England	X	DBC -R13 Suggest that properties that fall within the proposed local conservation area are excluded from the separate list of non-designated heritage assets so I've amended the local list to omit the. They would have the same protection under this proposed designation. However, if this element of the local list did not succeed, then the omitted buildings should be reinstated. Accept change to para 117 NPPF 2019.

	<p>the list is rather extensive at present and might benefit from critical review against clearly identified criteria, on which we would be happy to advise.</p> <p>With regard to the policy wording, 117 refers to 'original' features which may be ambiguous and even unhelpful, where, for example, later additions may add to a building's significance. As such we suggest amending this to read: "Alterations and extensions to non-designated local heritage assets must complement and seek to conserve those features that contribute to their architectural, archaeological, historic or artistic interest."</p> <p>Please do make sure the reference to the NPPF in paragraph 119 is to the current version.</p>			
DBC-R14	<p>Policy DBC2: Sustainable design</p> <p>Paragraph 91, iii, on page 28 <i>'Integrating car parking into the design, using varied forms of provision, so as to avoid over-reliance on 'on-street' parking'</i> OCC comment: Parking standards for all new development should be in line with Oxfordshire County Council's Parking Standards. It is suggested that these are referred to in the Neighbourhood Plan. These can be found at the following link on page 13: https://m.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/transportpoliciesandplans/newdevelopments/parkingstandardsfornewresidentialdevelopments.pdf We suggest the following sentence is added: <i>New housing proposals should meet the requirements in Oxfordshire County Council's Parking Standards for New Residential Developments.</i></p> <p>Paragraph 91, iv, on page 28</p>	OCC	X	

	<p><i>‘Prioritising pedestrian permeability and taking opportunities to provide connections and improved access to Cumnor’s footpath network and other walking and cycling routes’</i></p> <p>OCC comment: We are supportive of this policy. It would be useful to identify the key opportunities for improving access to this network in the Neighbourhood Plan. Typically, funding for these types of improvements comes from development, however improvements from developments can only be sought if they meet the 3 tests set out in Community Infrastructure Levy (CIL) regulation 122. A planning obligation must be:</p> <ul style="list-style-type: none"> a) Necessary to make the development acceptable in planning terms b) Directly related to the development c) Fairly and reasonably related in scale and kind to the development <p>5</p> <p>Paragraph 97 on page 29</p> <p><i>‘The integration of parking into the design in lower density and rural area will ensure that front gardens are not dominated by significant areas of hard-standing for cars’.</i></p> <p>OCC comment: This comment is the interpretation of the Policy DBC2, however it may be seen as inconsistent with point iii. of the policy, which states <i>‘Integrating car parking into the design, using varied forms of provision, so as to avoid over- reliance on ‘on-street’ parking’</i>. The policy seems to be seeking a balance between on-street and off-street parking and it may be helpful to make this intention explicit. OCC’s policy allows for a combination of on and off-street car parking provisions in developments, this provides suitable guidance for finding a balance between the types of parking provisions.</p>			
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DBC-R15	<p>Spatial Characteristics (draft policy DBC1)</p> <p>The University is supportive of the principle of this policy and agree that development proposals should be designed in line with characteristics of the immediate site and context. However, we do not see the necessity of criteria 'i-iii' considering that development proposals should accord with the design principles set out within the District wide adopted Design Guide document (2015). We therefore consider that criteria 'i-iii' should be removed and that the policy should be re-worded as follows:</p> <p><i>Development proposals, including for limited infill development, should be designed in line with the established spatial characteristics of the immediate site and context in consideration of the design principles set out within the Vale of White Horse District's Design Guide document (2015), or any subsequent updates to this Design Guide.</i></p> <p>Sustainable Design (draft policy DBC2)</p> <p>The University supports the principle of this policy however would advise that the word 'must' should be replaced with 'should' within the first sentence and the words 'where possible' should also be included, as indicated below. This is to ensure flexibility within the wording of the policy to avoid the list of criteria becoming overly perspective which could stifle sustainable development proposals from coming forward within the Neighbourhood Plan area.</p> <p><i>Development proposals should be sustainable and well-designed, including, where possible:</i></p> <p>Conserving and enhancing non-designated heritage assets (draft policy DBC6)</p> <p>The NPPF does not require development proposals to conserve or enhance the architectural, archaeological, historic or artistic interest of non-designated heritage assets. This is confirmed at paragraph 197 of the NPPF which states that in weighting applications that directly or indirectly affect non-designated heritage assets, a <u>balanced judgment</u> will be required having regard to the scale of any harm or loss and significance of the heritage asset.</p> <p>On this basis, the University considers that this draft policy is amended to reflect paragraph 197 of the NPPF or be removed from the Plan.</p>		X	fair comment re the number of non-designated heritage assets.
DBC-R16	<p>Page 28 – Policy DBC2: Sustainable Design</p> <p>We recommend you replace 'must' with 'should', to give the policy the required flexibility. This flexibility is needed so that applications for planning permission can be determined in accordance with the development plan, unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990).</p> <p>We recommend you delete paragraph 93 from the policy and inset 'All' to paragraph 91.</p>	VoWHDC	X	

	<p>Page 29 – Policy DBC3: Design Cumnor Village Historic Core For clarity we recommend that you replace ‘must complement’ with ‘should show clearly how they have taken into account’.</p> <p>Page 31 – Policy DBC4: Design in the Rural and Low Density Areas of Cumnor Parish For clarity we recommend that you replace ‘must complement’ with ‘should show clearly how they have taken into account’. In paragraphs 105 and 107 we recommend you replace ‘must’ with ‘should’ to give the policy the required flexibility to allow applications for planning permission to be considered properly.</p> <p>Page 32 – Map 10 Lower Density Areas of Cumnor Parish This map could be made clearer to show the areas of Cumnor inset from the Green Belt.</p> <p>Page 33 – Policy DBC5: Infill in the Green Belt We recommend you delete ‘including in the ‘washed-over’ Green Belt in Cumnor Village’, as Cumnor Village is inset from the Green Belt, as set out in Core Policy 13 of the Local Plan Part 1: ‘Development will be permitted in the following settlements, which are inset to the Green Belt (as shown on the Adopted Policies Map), where the proposed development is within the existing built area of the village and in accordance with Core Policies 3 and 4: - Appleton – Botley – Cumnor – Kennington - North Hinksey - Radley, and - Wootton’ Paragraph 145 of the NPPF identifies that ‘limited infilling in villages’ is an exception to inappropriate development in the Green Belt. As worded this policy does not have regard to the NPPF as the policy does not comment on the location or scale, e.g. in villages. We recommend the policy is amended to have regard to the exception as set out in the NPPF. Wording such as:</p>			
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	<p>'The Green Belt will continue to be protected to maintain its openness and permanence. Development proposals in the Green Belt will be determined against principles set out in Core Policy 13: The Oxford Green Belt in the adopted Vale of White Horse Local Plan Part One. Proposals for inappropriate development will not be supported except in very special circumstances.'</p> <p>The Green Belt already benefits from a high level of protection through national and local policy and the NPPF sets out that plans should avoid unnecessary duplication of policies. It is not clear what this policy achieves beyond national and local policy.</p> <p>Page 34 – Policy DBC6: Conserving and enhancing non-designated heritage assets</p> <p>Paragraph 117 is not achieving anything more than paragraph 116, which in the broader scope of 'development proposals' would include 'alterations and extensions'.</p> <p>Page 34 – Paragraph 119</p> <p>These have been assessed in accordance with the methodology set out in the Oxford Heritage Asset Register and based on criteria set out in the NPPF, July 2018.</p> <p>Reference should be made to the most recent version of the NPPF published in February 2019.</p>			
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Rural & Natural Environment Policies (RNE1-5)

RNE-R1	I am in favour of continued strong protection of green belt, woodland, common land and wildlife sites. I would like noise pollution to be given higher status.		NBP	noted
RNE-R2	<p>I really support the detailed proposals in RNE1 and 2. Ground water and Surface water flood risk are critical factors in our local area. I would therefore like to see the Risk assessment proposals detailed in the interpretation section of RNE2 included as a key part of the main policy.</p> <p>Very pleased that consideration and protection of some of the beautiful views in our Parish has been included</p>		NBP	noted
RNE-R3	RNE2, Map 13: The map is distorted and not easily legible.		NBP	Fixed in v1.1
RNE-R4	The promotion of wildlife corridors to link existing ancient woodland and remnants of same can act to preserve the remnants of its associated rich wildlife. These corridors can also act as avenues to well-being walks and be maintained by volunteer groups promoting community cohesion and integration. This should be seen as a priority in any future development both housing and transport.		NBP	Noted Cumnor Fit for the Future topic?
RNE-R5	Generally good, though "washed over" green belt could be spelt out. Tyres produce particulates which should be included in pollution issues.		NBP	See definition in RES section
RNE-R6	<p>All points made would reflect my views well. I feel passionately that everything mentioned is important.</p> <p>On Cumnor Hill, there has been increased light pollution with the installation of white street lights which replaced the yellow lights. The effects of white light on wildlife is to disturb the sleep patterns</p>		NBP	noted

	and disorientate nocturnal animals. Why were these altered, was the Parish Council consulted and will this white light creep further into Cumnor Parish?			
RNE-R7	Keep wildlife corridors on Cumnor Hill		NBP	Cumnor Fit for the Future topic?
RNE-R8	<p>Paragraph 130. This paragraph rightly recognises the harm that will be caused to the Green Belt, the landscape setting of Cumnor village, and the amenities of local residents by Oxfordshire's proposed Park-and-Ride site at Cumnor. Although this paragraph refers to some mitigation measures that would be needed, these would be most unlikely to have any significant effect on the impact of the proposal. I think that the Plan should take a stronger stance and include something like "If this damaging proposal goes ahead it will be essential that the landscape and the openness of the Green Belt are safeguarded. This should be by restrictions on its use solely for a Park-and-Ride car park with no ancillary facilities, no buildings beyond a low impact and sympathetically-designed bus shelter for passengers, and very-low-impact lighting. Specifically, suggested uses such as a "click-and-collect" facility for parcels, café facilities, or other commercial uses, should not be permitted." As this proposal will have such a major impact on the parish (should it go ahead) a new Policy on the proposal should be included in the Plan, with similar wording to that suggested above.</p> <p>Paragraph 131. The proposal for an Oxford-Cambridge Expressway is also likely to have a very great impact on the parish, especially if a route through or close to the parish is chosen. Although it may not happen, it's important that the Plan recognises the threat, so this paragraph is welcome. Without knowing the details of a route it is difficult to comment further and so I support the wording currently in the consultation draft.</p>		NBP	Noted for inclusion in policy review

	<p>Paragraph 143. If I've understood it correctly the "green area on Map 11" covers the whole area of the Plan (and if it doesn't it should). This paragraph would be more helpful if it said that Policy RNE 1 applies to the whole Plan area.</p> <p>Paragraph 154. The numbered sub-clauses in this paragraph are welcome, as the risk from groundwater/surface water flooding is considerable in certain parts of the parish. However, as these sub-clauses are important requirements rather than just recommendations, they should be included in Policy RNE2 as a requirement of the policy.</p> <p>Paragraph 156. As in the previous comment, the suggestions in the first sentence of this paragraph should be included in Policy RNE3 rather than a statement in the 'Interpretation' section. It is difficult to see how the planning authority can assess a planning application against Policy RNE3 without this information, so it should be a requirement.</p> <p>Policy RNE4/Map 14. I very much support this policy but would suggest that another series of views is included. The southern slopes of Wytham, with Wytham Woods, are very attractive and can be seen from a number of places on Cumnor Hill, from the gaps between the houses. These views are mentioned in the character assessment for lower Cumnor Hill as they are an important part of the area's character and its setting within the wider landscape and countryside. There is no single view but a series of views as one travels up and down the Hill. The views are fragile in the sense that they are easily obscured by new development and it's important that they are recognised and included in the Plan.</p>			
RNE-R9	<p>Policy RNE4 Important Views.</p> <p>We recommend reviewing this policy to ensure that it complies with the requirement that it does not seek to introduce planning</p>	Historic England	X	

	requirements for sites beyond the plan area, which could unfortunately undermine the strength of the policy as a whole - which we consider to be valuable.			
RNE-R10	The University notes that draft policy RNE2 makes specific reference to the Farmoor and Cumnor Hill & Dean Court area. It should be noted that all development proposals within the Neighbourhood Plan area will need to demonstrate that flood risk and surface water drainage can be managed to ensure that flood risk is not increased elsewhere, in accordance with Chapter 14 of the NPPF. This includes the use of Sustainable Drainage Systems (SuDS) <u>unless there is clear evidence that this would not be appropriate</u> (paragraph 165 of the NPPF). On this basis, we consider that there is no need for this draft policy to make specific reference to areas of the Neighbourhood Plan Area, and therefore these references should be removed.		NBP	noted
RNE-R11	<p>Page 39 – Policy RNE2: Flood Risk Comments from the Council’s Drainage Engineer: “discharge off site” should be added to the end of paragraph 148. Suggest paragraph 149 is reworded to: “For all major development, sustainable drainage should be suitably designed with the aim to ensure that discharge rates do not exceed greenfield rates with systems designed to add to the area’s biodiversity. Systems must be designed with full consideration for future maintenance.”</p> <p>Page 42 – Interpretation: Comments from the Council’s Drainage Engineer: Consider the groundwater investigation interpretation onerous if applied to all forms of development. Requiring boreholes and groundwater monitoring for example for a basic extension would unlikely be considered a proportionate response. Recommend the interpretation should relate to all major development.</p>	VoWHDC	X	
RNE-R12	<p>Page 43 – Policy RNE3: Air Quality, Noise & Light Pollution As worded this policy is overly restrictive and contains less detail than the Local Plan policies. The Local Plan contains the following policies which address these themes: Development Policy 25: Noise Pollution Development Policy 23: Impact of Development on Amenity</p>	VoWHDC	X	

	<p>Development Policy 26: Air Quality</p> <p>Development Policy 21: External Lighting</p> <p>The NPPF is clear that plans should avoid unnecessary duplication of policies (paragraph 16). We recommend that local detail is added to this policy, or the policy deleted from the plan.</p>			
RNE-R13	<p>Page 43/44 – Policy RNE4: Important Views</p> <p>Please note that policies can only apply to areas within the designated neighbourhood area, therefore you should avoid including views which extend beyond the designated neighbourhood area. Views 19,20,21, and 22 look like they extend beyond the neighbourhood plan area.</p> <p>Page 45 – Interpretation</p> <p>It might be worth referencing to the Important Views Report to help support the policy.</p> <p>The text in 159 should be amended to more closely align with Policy RNE4: Important Views. We suggest that the focus is on development proposals and applications, not applicants. We also suggest you replace ‘will be required to’ with ‘should’, for example: ‘Applications should have regard to the important views...’.</p>	VoWHDC	X	

Residential Development Policies (RES1-3)

RES-R1	<p>I think it would be helpful if a clearer definition of infill development is included.</p> <p>Also I would like to see the policy state that backland development cannot be allowed under this policy.</p> <p>Hugely supportive of the detailed policy in RES 2 and the requirement for 35% affordable housing in any development. This is urgently required! This is a very well worded and important policy</p>		X	
RES-R2	P46, Paragraph 164: The table shows the population of residents 65+ for England, whereas the text describes the UK average. This seems inconsistent.	Agree: should read "England and Oxfordshire average" not "Uk and..."	NBP	
RES-R3	Support. Suggest addition to paragraph 178 that where 2/3 bedroom dwellings are provided need is for houses with gardens rather than apartments	Can't write into policy as no NPPF policies that stipulate dwellings can't be apartments	NBP	
RES-R4	Any development should be asked to be carbon neutral to save the local environment from pollution but also the regional and national environment. We should not promote a high dependency on electrical use (for cars or houses) if that is produced from nuclear but reduce use at source and produce as close to source as possible. This is all possible in modern building technology.	Can we require 'carbon neutral'? Don't think we can stipulate energy efficiency beyond terms in NPPF Check with consultant for opportunities beyond NPPF	NBP	
RES-R5	The plan's objective of encouraging the development of smaller and more affordable homes reflects important socioeconomic changes in Oxfordshire and beyond. Is it possible to forecast what the effect of lowering the affordable home threshold will be? For new developments within Cumnor village over the last say 5 years, how many more homes would have been affordable housing, if this policy had applied retrospectively	DR has already done this – see NBP Group June 2020 minutes Q: should we include as additional evidence in next draft?	NBP	

	(and assuming it did not change the decision to develop)? This would be interesting to get a sense at least of the effect of the proposal.			
RES-R6	<p>Policy RES1 i. The question of infill has been commented on above (see Policy DBC5). The wording in this Policy is also too loose and does not reflect the wording in paragraph 176 which I support. Sub-clause i. of the Policy should be deleted and the definition in the first sentence of paragraph 176 substituted. There should also be a cross-reference to Policy DBC5. Paragraph 176 is welcome as the Plan needs a clear definition of 'infill'; please see comments above. There needs to be consistency throughout the Plan so this paragraph should be the only definition given, with references to it from elsewhere in the Plan.</p> <p>Policy RES2. - Paragraph 179. I want to register my strong support for this part of the Policy: however, I'm concerned that adopting a threshold of 2 dwellings for affordable housing provision may take the Plan out of conformity with the NPPF and the Vale's adopted Local Plan 2031, as the revised NPPF requirement for affordable housing relates to sites of 10 or more dwellings and the Local Plan's requirement is for sites of 11 or more.-</p> <p>Paragraph 181. I also support this requirement but I question why just this one element of residential standards/requirements is set out here but no others are mentioned (such as the mass and scale of buildings, access, car parking, materials, landscaping etc.).</p> <p>I think that Policy RES2 should just deal with 'residential mix' and paragraph 181 moved to a new policy on housing standards, similar in scope to Policy DBC4 but relating to areas not covered by that policy. Paragraph 186 introduces a new issue which is not in the Policy so it should not be in the</p>	<p>Need for consistent definition of infill throughout Plan documentation</p> <p>If this draft policy is not endorsed at examination we will need other policies as a 'backstop'</p> <p>Look at moving para as suggested to DBC4 Ask consultant to check the 'internal logic' of this</p>	X	

	interpretation section for the policy. It should be included in a new policy on residential standards, as mentioned in the preceding comment.			
RES-R7	Policy Res3. We wonder whether the meaning of a "disproportionate mass in residential areas" is sufficiently clear or could be better defined. This might require further explanatory text both within and following the policy - should care home facilities have similar proportions to a group of residential properties with similar levels of associated green open space, albeit shared? Might this require design to include a number of clearly separate units of similar scale to private houses?	Historic England	X	
RES-R8 See also DBC-R11	The terms 'infill' and 'infilling' and phrases related to these occur multiple times in the Plan, with limited and imprecise forward referencing to RES1 (p. 50) and with a gloss in para. 176. Para. 85, re DBC1, for example, is unsatisfactory. Overall, the phraseology used is not uniform. Given the importance of infill development it is imperative that the meaning to be attributed to it should not be capable of multiple interpretations. For example, what weight is to be attached to the qualifying adjective 'limited'? On a positive note, it is good to see in Para. 176 that backland development is explicitly excluded from infilling.	Again, need consistent description of 'infill' Can consultant suggest wording and/or check our proposed new wording?	NBP	
RES-R9	We note the pre-submission draft neighbourhood plan requires that schemes of 2 or more dwellings must include provision of 35% affordable housing (Policy RES2: Residential Mix and Standards). In the case of 2 dwellings this is stated to be interpreted as requiring provision of at least 1 affordable dwelling. This is not aligned to the VOWH LPP1 Core Policy 24: Affordable Housing, which sets a threshold of eleven units or more where 35% affordable housing would be required. Though the rationale for setting a lower threshold is explained, it will be up to Vale of White Horse District Council to advise on if this is in accordance of strategic policies of VOWHDC Local Plan Part 1 and 2.	OCC Again, likelihood of success? Are there alternates/backstops – ask Consultant	NBP	
RES-R10	It is good to see a mention of providing unobtrusive storage space for refuse and recycling in policy RES1, but other than	OCC	NBP	

	<p>this, waste reuse, reduction and recycling appear to have not been considered within the neighbourhood plan.</p> <p>Oxfordshire councils have ambitious targets to reduce the amount of waste generated and increase the amount recycled as demonstrated in our Joint Municipal Waste Management Strategy 2018-2023.</p> <p>Enabling the residents of new dwellings to fully participate in district council waste and recycling collections, for example through providing sufficient and convenient storage space for bins both inside properties and externally, will allow Oxfordshire's high recycling rates to be maintained and minimise an increase in residual waste.</p> <p>Bin store provision which can accommodate the correct number of mixed recycling, refuse and food recycling bins, are safe and easy to use for both residents and waste collection crews and meets the requirements of the waste collection authority are required.</p> <p>The Parish Council may also wish to consider how the neighbourhood plan might direct use of their community spaces to help reduce waste and build community cohesion through assets such as community fridges, space for the sharing economy (library of things), refill stations, space for local food growing etc.</p>	<p>Interesting point re community spaces – maybe put this in the Community Actions section? Especially if Parish has another large planning application – would have been valuable re Timbmet/Kimmeridge Rd and Tilbury Fields developments</p>		
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RES-R11	<p>Residential Mix and Standards (draft policy RES2)</p> <p>With regards to paragraph 178 of the draft policy RES2, the University consider that it is too restrictive to state that schemes of two dwellings or more, should provide smaller dwellings (1-2 bedrooms) in at least equal number to larger dwellings (3 bedrooms and above). The NPPF states (paragraph 61) the need to provide a mix of housing to meet the housing needs of different groups. This paragraph as written could stifle residential proposals on small sites, whereby it is not possible to provide as many larger dwellings in equal number to smaller dwellings. We therefore consider that the second sentence from this paragraph should be removed.</p> <p>We note that paragraph 179 states that schemes of 2 or more dwellings must include provision of 35% affordable housing. This is compared to the threshold of 11 or more under Core Policy CS24 of the Vale of White Horse Local Plan Part 1. Paragraph 183 of the CNP states that the justification for the amendment to the affordable requirement in the Local Plan is on the basis that development in Cumnor will be of small scale which would then meet the need for smaller and affordable housing to be provided locally. Although the University does not contest the principle of providing affordable housing as part of development schemes, the Neighbourhood Plan is not supported by any clear evidence to support this justification from departing from the Local Plan. Furthermore, the NPPF states at paragraph 63 that the providing of affordable housing should not be sought for residential developments that are not major developments (i.e. 10 or more dwellings), other than in designated rural areas. Considering there are built up areas located within the Neighbourhood Plan Area, we consider it is inappropriate to have a threshold so low. It is therefore considered that paragraph 179 should be deleted from draft policy RES2. Instead affordable housing provision for development proposals within the Neighbourhood Plan Area should be considered in light of Core Policy CS24 of the adopted Vale of White Horse Local Plan Part 1.</p>	See comments above about likelihood of achieving community expressed desire in this policy and what alternate/backstops are there?	NBP	
RES-R12	<p>Page 50 – Policy RES1: New Residential Development</p> <p>This is a broad policy which applies to the whole neighbourhood area, which includes land both within and outside the Green Belt. National and local policy places greater restrictions on development within the Green Belt, which this policy does not have regard to, we recommend you insert ‘and where compliant with local and national policy’.</p> <p>It is worth highlighting here our previous comment that Cumnor village is inset from the Green Belt and that the remainder of the area is within the Green Belt, therefore it might be more appropriate to separate these two aspects. For example, a policy for Cumnor village and a policy for outside of Cumnor village.</p> <p>i. Infill development within existing built frontages</p>	VoWHDC	X	

	<p>Currently this is overly restrictive, we recommend you replace 'within existing built frontages' with 'within the existing built-up area'. By saying 'frontages' this could restrict other forms of sustainable infill development from being delivered.</p> <p>ii. Brownfield sites as per the Vale of White Horse District Council Brownfield Register</p> <p>In line with the NPPF the neighbourhood plan should promote the effective use of land in meeting the need for homes and other uses. Paragraph 118 sets out that planning policies should:</p> <p><i>'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.'</i></p> <p>We encourage you amend this policy point to recognise that it is not just brownfield sites on the Brownfield Register, but other suitable brownfield sites.</p> <p>iii. Refurbishment of agricultural buildings</p> <p>The refurbishment of agricultural buildings does not relate to the location for sustainable development, it relates to a form of development. We are not sure if refurbishment is the correct term, given something such as replacing rooftiles could be refurbishment. The designated neighbourhood area comprises areas both within and inset from the Green Belt. Most of the rural area of the neighbourhood area is within the Green Belt. The NPPF clearly sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 145 of the NPPF sets out the exceptions:</p> <p><i>'a) buildings for agricultural and forestry;</i></p>		
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	<p><i>b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purpose of including land within it;</i></p> <p><i>c) the extension or alteration of a building provided that it does not result in disproportion additions over and above the size of the original building;</i></p> <p><i>d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</i></p> <p><i>e) limited infilling in villages;</i></p> <p><i>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites);</i></p> <p><i>and</i></p> <p><i>g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:</i></p> <ul style="list-style-type: none"> <i>- not have a greater impact on the openness of the Green Belt than the existing development; or</i> <i>- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'</i> <p>Point iii, does not comprehensively cover forms of development which may be appropriate within the neighbourhood plan area, even with the Green Belt covering a portion of the area as set out above. We recommend this policy is amended to reflect the Green Belt exceptions. Text such as:</p>			
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	<p>'In the Green Belt where they meet one of the exceptions set out in National Policy and Core Policy 13: The Oxford Green Belt in the adopted Vale of White Horse Local Plan Part One.'</p> <p>174. Extension of built areas in the form of ribbon development would not be sustainable and will not be supported Outside of the built areas of the settlements, it is open countryside where Core Policy 4: meeting Our Housing Needs of the Local Plan Part One sets out, 'development in open countryside will not be appropriate unless specifically supported by other relevant policies as set out in the Development Plan or national policy'. Therefore, in line with Core Policy 4 the extension of built areas, which extend into the open countryside, would not normally be permitted. The policy should avoid duplication and we recommend this sentence is deleted.</p> <p>Page 50 – Paragraph 176 This description of infill development in the supporting text is overly restrictive and we recommend this paragraph is deleted or re-worded. Proposals concerning infill development need to be considered on a case by case basis and in line with Core Policy 4 in the Local Plan 2031 Part 1. In relation to Larger Villages (Cumnor) there is a presumption in favour of sustainable development, and at Smaller Villages (Farmoor), proposals for limited infilling development may be appropriate within the existing built area of these settlements. The definition provided in the supporting text is not consistent with local policy or how applications for planning permission are determined. For example, local and national policy does not distinguish between 'fairly densely development areas rather than a loosely knot area of housing', and this does not provide the required clarity.</p>			
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RES-R13	<p>Page 50 - Policy RES2: Residential Mix and Standards Paragraph 178 and 179</p> <p>We recommend that you change 'must' with 'should' so that the policy has the required flexibility.</p> <p>Comments from our Affordable Housing Officer:</p> <p>The beginning of the second sentence of paragraph 178 should be revised to "<i>Schemes of 10 dwellings or more...</i>". Similarly, paragraph 179 should read "Schemes of 10 or more dwellings must include provision of 35% affordable housing". The final sentence of paragraph 179 will need to be revised or updated to reflect this.</p> <p>180. Any affordable requirement must be met as an integral part of any development and be tenure blind.</p> <p>As above, this is not in general conformity with the strategic policies in the development plan. Core Policy 24: Affordable Housing in the Local Plan 2031 Part One sets out that '<i>the Council's preference is for on-site affordable housing provision (with the exception of part units). Only in exceptional circumstances will any other scenario be considered</i>'. The policy then goes on to set out the considerations. The Local Plan policy contains more detail on this, we therefore recommend that 180 is deleted from the policy</p> <p>Page 51 – Paragraph 182 and 183</p> <p>Neighbourhood plans should have regard to the NPPF and be in general conformity with the existing Vale of White Horse Local Plan, therefore amendments should not be made to the affordable housing percentage or threshold. In line with the recommendations above from the affordable housing team, this paragraph should be amended to reflect a threshold of 10 or more dwellings.</p>	<p>VoWHDC</p> <p>What does VoWHDC use?</p>	X
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	<p>Comment from our Affordable Housing Officer:</p> <p><i>It is evident from the survey that Cumnor parish would like affordable housing particularly for the people of Cumnor. It is therefore advised that the parish to look at exploring a rural exception site or a community land trust (CLT) with the aim of providing affordable housing to the residents of Cumnor which will remain affordable in perpetuity.</i></p>			
RES-R14	<p>Page 51 – Policy RES3: Care Homes and Residential Institutions</p> <p>ii. Parking spaces are provided to the side or rear of the new property and not the road frontage</p> <p>iv. There is no adverse impact on residential amenity, including traffic at unsociable hours.</p> <p>Whilst the policy should encourage the delivery well designed parking solutions, it might be restrictive if the policy wording is too prescriptive. The Vale of White Horse Design Guide recognises that <i>‘the suitability of parking solutions will vary depending on the location and nature of the proposal’</i>, which might not comprise of parking to the side or rear. We recommend that the wording is amended to ensure the policy has the flexibility to consider the Design Guide and deliver alternative parking solutions if necessary. The policy could encourage the delivery of a certain type of parking but recognise that it might not always be possible.</p> <p>Is it necessary to specifically identify ‘including traffic at unsociable hours’, is this something associated with care homes and residential institutions? Do you have evidence to support this? If not, we recommend that ‘including traffic at unsociable hours’ is deleted.</p>	VoWHDC	X	

Employment & Community Facilities Policies (EBC1-4)

EBC-R1	There is an under-provision of nursery / Kindergartens in the Parish. That has transport impacts. The plan should seek to ensure that any assessment of provision for / loss of community facilities in the Parish takes into account this un-met need. It should seek to identify land / buildings for new nurseries / Kindergartens in the Parish.		NBP	This can be done by the NPG, but if land etc is required, then Planning will be involved
EBC-R2	We need small office, business and workshop facilities with affordable rents that encourage a modern economy with increased self-employment		NBP	This need was identified pre-Covid-19 but the next “new normal” creates uncertain demands
EBC-R3	Community facilities should include youth clubs, out of school education, etc.		NBP	Understood
EBC-R4	There is a very wide spread of employment opportunities in the area but very small opportunity for the employment of young people and adults with special needs. There does not appear to be any support network or sheltered place for the permanent employment of those not supported by mainstream opportunities. Maybe this could be put as a condition of future development.		NBP	Balance in the community is difficult given the largely rural+residential nature of the Parish
EBC-R5	EBC1 - I agree that it is important to support employment uses providing they do not adversely impact the residential amenity of the area of the rural setting. EBC2, 3 & 4 - I support these policies.		NBP	noted
EBC-R6	Do we need to emphasise more the variety and nature of the parish's community assets and show how they are assets for the local community even if they are not owned locally?		NBP	noted

EBC-R7	I welcome the provision of sustainable business facilities across Cumnor, so long as these do not cause or exacerbate nuisance, noise. Conversely I would resist calls from new residents for current businesses to cease because of factors which were pre-existing. I endorse para. 202, and would not want current recreation facilities to be lost to development, without equivalent or better provision being made within the Cumnor area.		NBP	Employment is mostly “working from home” by service industries – consultants, teachers, academic research, etc. Such activities are deemed to be “sustainable” to the extent that they have a low environmental impact.
EBC-R8	<p>Policy EBC1. - I’m not happy with the inclusion of the word “significant” in the policy as it is imprecise and is likely to give rise to dispute about what is significant. I think that the word is better omitted.- With regard to sub-clause iii., as the policy covers the conversion of agricultural buildings to employment use it’s important that such conversions do not have any adverse impact on the countryside and the landscape generally, as well as on the “rural setting on the edge of settlements”. I suggest that iii. be reworded to say “the landscape and the countryside, including the rural edges of settlements.”</p> <p>Policy EBC2. As in my comment on Policy EBC1 above, I object to the inclusion of “significant” in the policy and think it should be omitted.</p> <p>Policy EBC3, paragraphs 204 and 205. It is clumsy to have the provisos to the policy set out in paragraph 205 as a separate paragraph. The first sentence of Paragraph 204 should be amended by adding to its end “, subject to there being no adverse impact on;”</p> <p>Paragraph 205. The recreational uses mentioned in the policy should also not have any adverse impact</p>		NBP	These are Planning issues, the consideration of which needs to be contextualised by the NPG Plan which is grounded in earlier surveys of the community (over 1,000 responses).

	on the countryside and landscape setting of the reservoir. A fourth criterion should be added to this effect.			
EBC-R9	<p>Page 55 – Policy EBC1: Business and Employment Facilities</p> <p>197. To maintain a sustainable mix of uses, including local employment opportunities, loss of employment use to residential use will be refused, except where it can demonstrate that continuing employment uses in the location are not economically viable.</p> <p>We recommend you add ‘they comply with other development plan policies and’ after ‘supported, providing’. Given that the neighbourhood area contains Green Belt land, some forms of employment development might be inappropriate if they are not one of the exceptions set out in the NPPF.</p> <p>The NPPF sets out that plans should be prepared positively. We recommend that this sentence is re-worded to make it more positive and to more closely align with Core Policy 29: Change of Use of Existing Employment Land and Premises:</p> <p>‘To maintain a sustainable mix of uses, including local employment opportunities, the loss of employment uses will only be supported where it can demonstrate that a mixed use enabling development has first been considered and the continuing employment uses in this location are not economically viable.</p> <p>The NPPF sets out that plans should avoid unnecessary duplication of policies. Core Policy 28: New Employment Development on Unallocated Sites</p>	VoWHDC	X	<p>Noted for policy review</p> <p>Mixed use is desirable but has to be grounded in real demand, current and forecast, to avoid “white elephants”</p>

	and Core Policy 29: Change of Use of Existing Employment Land and Premises from the Local Plan 2031 Part 2 already touch on the themes discussed in this policy. Consider whether it is necessary to include this policy considering the Local Plan already covers this topic and the policy does not add any local detail.			
EBC-R10	<p>Page 55 – Policy EBC2: Community, Sports & Recreation Facilities</p> <p>202. Development proposals that would result in the loss of sports pitches and recreational use, will only be supported where it can be demonstrated that an equivalent or better facility is provided within the boundaries of the Parish</p> <p>To more closely align with Development Policy 8: Community Services and Facilities in the Local Plan 2031 Part 2 we recommend paragraph 201 is deleted and paragraph 200 is amended to read:</p> <p><i>‘Development proposals for new and extended community facilities, will be supported, particularly where:</i></p> <ul style="list-style-type: none"> <i>i. They are located within or adjacent to the built-up area of an existing settlement</i> <i>ii. They would clearly meet an identified local need, and</i> <i>iii. They are accessible for all members of the community and promote social inclusion.</i> <p><i>Development proposals for new community facilities, including sports and recreational use of open land will be supported provided there is no significant adverse impact on.’</i></p> 	VoWHDC	X	Noted for policy review

	<p>This policy addresses both community facilities and recreational/sports facilities, however paragraph 202 only deals with recreational use and the policy is silent on the loss of community facilities.</p> <p>Development Policy 34: Leisure and Sports Facilities in the Local Plan 2031 Part 2 and paragraph 97 of the NPPF set out clearly the tests for the loss of recreational land. Paragraph 97 of the NPPF states: <i>‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <ul style="list-style-type: none"> <i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> <i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> <i>c) the development is for an alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.’</i> <p>As worded the policy does not have to have regard to paragraph 97 in the NPPF. We recommend the policy is amended to more closely align with the NPPF and local policy.</p> <p>The NPPF sets out that plans should avoid unnecessary duplication of policies. Development Policy 8: Community Services and Facilities and Development Policy 34: Leisure and Sports Facilities in the Local Plan 2031 Part 2 already touch on the themes discussed in this policy. Consider whether it is necessary to include this policy considering the</p>			
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	Local Plan already covers this topic and the policy does not add any local detail.			
EBC-R11	<p>Page 56 – Policy EBC3: Farmoor Reservoir</p> <p>We recommend that the final sentence of 204, ‘suitable uses can include refreshments, watersports facilities, education and other visitor facilities’, is deleted from the policy text. This area of the neighbourhood area is located within the Green Belt and therefore subject to further restrictions and considerations. The NPPF sets out exceptions, one of which is:</p> <p><i>‘b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green belt and do not conflict with the purpose of including land within it’.</i> We recommend this sentence is deleted as the policy as currently worded could be supportive of forms of development which would not be appropriate in this Green Belt location.</p>	VoWHDC	X	Noted for policy review

Transport & Infrastructure Policies (TI1-5)

TI-R1	<p>Greater provision of superfast broadband would assist current and potential employment in the area. We badly need better cycle provision, not only along the B4044 but around Cumnor. The current use of Cumnor as a short cut or rat run by heavy goods vehicles, particularly going through the village centre and past the school, is bad for the community. An exciting prospect is the creation of wildlife corridors for greater biodiversity throughout the Parish. I would like to see a Memorial Arboretum develop in Cumnor.</p>	<p>Policy TI5 supports superfast broadband in the way this comment indicates.</p> <p>Policy TI3 propose better cycle provision between the various settlements in the parish consistent with this comment.</p> <p>Policy TI2 is consistent with the need to reduce congestion (including in Cumnor Village) and raise road safety. The need to reduce the use of the Village as a short cut is also understood.</p> <p>It is good to see support for wildlife corridors and a memorial arboretum (Policy TI1)</p>	NBP	
TI-R2	<p>In para 212 the 3 or 4 fold increase is an underestimate of extra traffic if further development (such as along the Oxford Cambridge Arc) takes place.</p>	<p>The concern about extra local traffic from Ox-Cam Arc is understood. The NP is</p>	NBP	

	The 3 or 4 fold increase is calculated by merging expected A34 traffic with existing A420 traffic.	only able to use figures for traffic quoted elsewhere.		
TI-R3	All the matters outlined are of great concern and are well outlined in this document. The OxCam Expressway, the Park and Ride, the amount of heavy vehicles driving through the village and the speed reduction on Cumnor Hill. Residents of the village have previously discussed lowering the speed limit through the village centre (near the school) to 20mph; maybe this could also be noted.	The suggestions for lowering the speed limit through Cumnor Village to 20 mph and to 30 mph are noted, for possible inclusion in the community actions.	NBP	
TI-R4	We still retain a fairly good bus service into Oxford, which is helpful although it could be more frequent. Travel anywhere by car is problematical - it takes only one problem on the A420 or the A34, and the knock-on effects on traffic build up can be seen all around Cumnor roads - it is a very fragile network, and easily broken. No new roads should be built which encourage traffic to use Cumnor as a rat run - the traffic through the village has visibly increased over the past ten years. Swinford should be weight-limited, with the only large vehicles allowed on it being buses. We need to encourage more people to use buses - which is only possible if there are more of them since many at peak times are packed and do not arrive on time. More cycle paths and walking paths are also needed to encourage people out of their cars. We do now have a fast speed internet service - Gigaclear - but this is not cheap, as it currently has no competitors - that may change in future. The 'fit for the future' initiatives are excellent.	The comments about traffic congestion and the impact of new development are covered in Policy TI2. The WG will see whether the wording here needs to be strengthened. The comments about cycle and walking paths are gratefully received as they support Policies in the NP. Only a part of the parish has Gigaclear. Other parts still need faster broadband connection.	NBP	

TI-R5	<p>The support for the cycle path on the B4044 is greatly appreciated and your continued support for the scheme would be a very welcome element of the neighbourhood development.</p> <p>Changes to prevent the rat running of HGV's through Cumnor and over the Swinford toll bridge are plans which are very welcome to anyone living in Cumnor and in Swinford. Since the closure of the Rose Revived bridge to HGVs the heavy goods traffic over the bridge has increased significantly and steps to reduce this would be greatly appreciated by all users of the toll bridge.</p>	The comments about the cycle path are gratefully received.	NBP	
TI-R6	<p>I am a car user and keen cyclist. The Cumnor to Eynsham road is awful for either form of transport. I am pleased that the Plan says "The Parish Council recently unanimously voted to adopt a set of initiatives to enable Cumnor Parish to become 'Fit for the Future'. Part of this is a drive to improve air quality, enable greater use of sustainable travel options and to enhance the biodiversity within the Parish. The Big Survey highlighted that connectivity was important to residents and that the B4044 Cycle Path was a priority piece of infrastructure. "</p>	noted	NBP	
TI-R7	<p>I am not a resident of Cumnor or Farmoor but I cycle on the B4044 road sometimes. I would cycle it a lot more if it was safe with a well maintained cycle lane alongside it. It would need to be wide enough for two-way bicycle traffic though and a decent footpath there would make sense too. Currently I only ever cycle it on a Sunday morning before 10am and even then I try to use the A40 cycle lane instead. I am very glad this plan</p>	noted	NBP	

	<p>supports it but I'm not sure what it is promising in way of funding?</p> <p>In addition, I don't understand why the plan does not include a need to have a small footbridge that cycles could be pushed over at Bablock Hythe. Has this been considered? It would make cycling from places like Stanton Harcourt and Standlake so much shorter and safer into Oxford.</p>			
TI-R8	<p>Policy TI1: Infrastructure Priorities</p> <p>Paragraph 219 on page 59</p> <p><i>'The Parish Council's priorities for the use of CIL and S106 monies are as follows:</i></p> <p>i <i>i Improving access to public rights of way network and promoting sustainable connectivity around the Parish, including along the River Thames;</i></p> <p>ii <i>ii Creating a new cycle path on the protected cycle route (B4044);</i></p> <p>iii <i>iii Improve biodiversity and enhance wildlife corridors;</i></p> <p>iv <i>iv Create a Memorial Arboretum within the Parish.'</i></p> <p>OCC Comment:</p> <p>Please note that the legal tests for a s106 agreement are set out in Regulation 122 of the CIL Regulations 2010. The tests are:</p> <p>a) Necessary to make the development acceptable in planning terms</p> <p>b) Directly related to the development</p> <p>c) Fairly and reasonably related in scale and kind to the development</p>	OCC	X	

	<p>When identifying potential infrastructure improvements, it is worth considering whether they meet these tests if the proposal is to request funding from developers. However, we recognise that the use of the Parish Council's portion of CIL is less constrained.</p> <p>Policy TI2: Sustainable Transport Paragraph 221 on page 59</p> <p><i>'New development must incorporate a balanced and sustainable transport provision, including:</i></p> <ul style="list-style-type: none"> i <i>i. Facilities for cycling</i> ii <i>ii. Off street parking provision</i> iii <i>iii. Convenient pedestrian links to public transport facilities</i> iv <i>iv. Electric charging points for vehicles'</i> <p>OCC Comment: We are supportive of this policy. Please refer to our previous comments regarding Oxfordshire County Council's Parking Standards. Paragraph 222 on page 59</p> <p><i>'New development must have no significant adverse impact on traffic safety and congestion' 7</i></p> <p>OCC comment: It may be appropriate for this wording to reflect the same wording as that in the NPPF. It is the wording in the NPPF against which any new development proposal will be tested. This NPPF wording includes as follows: <i>'109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'</i></p> <p>Link:</p>			
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<p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NP_PF_Feb_2019_revised.pdf</p> <p>Policy TI3: Cycle Routes</p> <p>Paragraph 225 on page 60</p> <p><i>'The B4044 cycle route (see map 18) is protected from development, to enable a new cycle path to be provided. New development adjacent to the route must be designed to enhance safety and amenity of the proposed cycle path. Development proposals must not compromise the scope for public access to the protected route.'</i></p> <p>OCC Comment: Oxfordshire County Council is supportive of the B4044 cycle route scheme and is developing a business case and undertaking some feasibility work.</p> <p>It is not clear what is meant by 'it is protected from development'. It may be that the District Council can also provide the Parish Council with assistance on what tools are available within a neighbourhood plan to achieve the aim of protecting a route for a cycle path. It is noted that Paragraph 229 provides a link (www.B4044path.org) to evidence relating to the safeguarding of the route, but it is not clear whether the neighbourhood plan itself intends to safeguard the route, or what the specifications would be.</p> <p>We recommend that the text is updated prior to Submission of this Neighbourhood Plan taking into account the latest proposals from the County Council. Please contact us to obtain the latest when you are at that stage.</p> <p>Policy TI4 Footpaths and Bridleways</p>			
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<p>Paragraph 230 on page 62 OCC comment: We support this policy and suggest the following amendment to include the underlined word below: <i>'New development proposals must have no adverse impacts on the safety, accessibility or visual amenity of Cumnor's network of footpaths and bridleways. New development should take opportunities to enhance accessibility, connectivity and amenity of footpaths and public rights of way.'</i></p> <p>Paragraph 15 – Infrastructure This paragraph refers to a reduction in bus services through the parish as a result of the withdrawal of service 66 (now S6) through Cumnor village. Service 66 consisted of a small number of peak and evening journeys, which was a very small proportion of the total services in operation. It is considered that this paragraph places disproportionate emphasis on the withdrawal of this bus service given the very small role it played in the parish's overall transport mix. The withdrawal of a small number of specific journeys, when the main services to Cumnor village provide four buses per hour between them, will not cause "greater reliance on the car for transport". It is suggested that the sentence concerning bus service provision is deleted, as bus services are dealt with in more detail in later sections.</p> <p>Paragraph 27 – Transport & Traffic There is a lack of detail on bus services in this paragraph, with too great a reliance on the links to/from</p>			
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	<p>Oxford City. There is also no reference to the bus services which operate within the section of the parish on Arnold's Way. It is suggested the paragraph is reworded as follows:</p> <p><i>"Cumnor Parish is 4 miles away from Oxford city centre. Bus services to the parish are as follows (correct at January 2020):</i></p> <ul style="list-style-type: none"> • <i>• 4A (Elms Rise to Oxford and Wood Farm) – 2 buses per hour daytime, evenings and Sundays;</i> • <i>• 4/4B (Abingdon to Oxford and Wood Farm) – 2 buses per hour daytime, 1 per hour evenings and Sundays;</i> • <i>• 4C (Dean Court to Oxford and Wood Farm) – 1-2 buses per hour daytime, no evening or Sunday service;</i> • <i>• S1 (Carterton and Witney to Oxford) – 4-6 buses per hour daytime, 3 buses per hour Sundays, 2 buses per hour evenings; and</i> • <i>• S9 (Wantage to Oxford) – 2 buses per hour daytime, 1 bus per hour Sundays, 1 journey evenings.</i> <p><i>There is an additional service S6 which passes through the parish but has no stops."</i> 9</p> <p>Paragraph 28 – Transport & Traffic</p> <p>Whilst it is the case the services reduce to 1 bus per hour in the evenings to Cumnor village, this is not true for the other built-up areas to the east of the parish. Services operate to Arnold's Way and Cumnor Hill with up to 3 buses per hour (services 4/4A combined). Service S1 provides up to 2 buses per hour on</p>			
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	<p>Eynsham Road and to Farmoor, including buses operating until 0330 on Friday and Saturday nights. Given that the overwhelming majority of parish residents live in the built-up areas adjoining Botley, in Cumnor village, in Dean Court or in Farmoor, it cannot be the case that “many residents live more than a 10-minute walk from a bus stop”.</p> <p>There is no evidence for this statement and it should therefore be deleted. Transport for London’s Public Transport Accessibility Level (PTAL) guidance identifies a 10-minute walk as being 800 metres. The paragraph is therefore overly negative about bus services operating within the parish. There are a number of frequent services, easily accessible from most areas – whilst Dean Court may not have services outside daytime hours, most residents in this area will be within a short walk of a bus service on the Eynsham Road or Cumnor Hill. The section of Arnold’s Hill within the parish appears to have been overlooked.</p> <p>Paragraph 29 – Transport & Traffic</p> <p>Despite the tone of the text in paragraph 28, none of the five transport and infrastructure issues raised in the Big Survey and listed here are concerned with bus services. This indicates that the provision of such services is not considered by residents to be one of the key transport issues facing the parish at this time.</p> <p>Paragraph 194 – Rationale & Evidence</p> <p>Our comments on paragraph 27 highlight that in total there are up to 12-14 buses per hour between the parish and Oxford city centre, 4-6 buses per hour to Eynsham and Witney, 2 buses per hour to Abingdon and 2 buses per hour to Wantage.</p>			
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	<p>It is considered that the frequency and coverage of public transport services to Cumnor parish is not in itself a barrier to use. Without any evidence in the Plan as to the location of businesses, it cannot be stated that a lack of public transport services “creates a dependency on the car for many businesses in the parish”.</p> <p>If the intention is to retain a statement along these lines for the submission neighbourhood plan, it is suggested that the businesses referred to in paragraph 192 are mapped against the public transport network so that the accuracy of this statement can be verified.</p> <p>Paragraph 215 – Rationale & Evidence</p> <p>It is suggested that the sentence “The outlying hamlets of Filchampstead and Chilswell do not have access to public transport” is moved from the beginning of the paragraph to the end. The location of this sentence gives it undue prominence given the frequency and coverage of public transport services in areas where the overwhelming majority of the parish reside. 10</p> <p>Chilswell is not even accessible by metalled road, so implying that it should ever be served by public transport is unrealistic; on that basis, reference to it should be deleted.</p> <p>Much of the detailed bus service information contained in this paragraph would be superseded by the information suggested to be included in paragraph 27, which is a more appropriate location for this text as it is included in a contextual section of the Plan. It is suggested that the text in this section be replaced by a</p>			
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	<p>more general assessment of public transport services as below:</p> <p><i>“Cumnor village is served by up to 4 buses per hour to Oxford, 2 buses per hour to Abingdon and 2 buses per hour to Wantage, although these are provided by two separate companies at unequal intervals. Farmoor is served by up to 4-6 buses per hour between Oxford and Witney, whilst Dean Court and Arnold’s Hill are both served by up to 2 buses per hour to Oxford. Evening and Sunday services are lower, particularly to Cumnor village.”</i></p> <p>Paragraph 219 – Policy TI1: Infrastructure Priorities</p> <p>Paragraph 219 sets out the priorities for the use of Community Infrastructure Levy (CIL) and Section 106 funds, none of which relate to public transport.</p> <p>The County Council secures funds from developers for the improvement of the public transport network. Such funds have been used in the past to support enhanced evening and Sunday services on routes 4/4B between Oxford, Cumnor and Abingdon. Whilst it is unlikely that significant sums would become available within the parish in the absence of larger-scale development, the Plan identifies a weakness in services at these times and therefore it would appear prudent to add a further priority which would be:</p> <p><i>“v. improvement of public transport services, particularly in the evenings and on Sundays.”</i></p> <p>Map 18 – Plan of Proposed B4044 Cycle Route</p> <p>At present, this map shows walk, cycle and bus routes whilst its stated purpose is to indicate the location of the B4044 cycle route. As a result, it appears to not</p>			
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	show the S1 bus route between Eynsham and Botley because this is also the route of the path. It is suggested that either the map is altered to show walk/cycle routes only and a separate map elsewhere indicates the bus routes, or that the bus and cycle routes on the B4044 are shown more clearly to co-exist.			
TI-R9	In light of the changes which took effect in April 2018, which are set out above we would request that the following text along the following lines is incorporated within the Neighbourhood Plan, perhaps in addition to and to strengthen Policy TI1: <i>“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water encourages developers to use our free pre-planning service https://www.thameswater.co.uk/preplanning). This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we’ll do if we don’t. The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes”.</i>	Thames Water	NBP	noted
TI-R10	Page 59 – Policy TI1: Infrastructure Priorities Core Policy 7 in the Local Plan 2031 Part 1 discusses the requirement on new development to provide	VoWHDC	X	

	<p>supporting infrastructure and services. Neighbourhood plans should not repeat local plan policy.</p> <p>A neighbourhood plan can highlight the projects it wishes contributions to go towards, however it cannot be enforceable within a policy. CIL is a budgetary decision made by the appropriate council and it is therefore not possible for a neighbourhood plan policy to direct those contributions to certain infrastructure.</p> <p>The Examiner in the Uffington and Baulking examination recommended that their policy be deleted as it was not a policy and identified the ways in which the Parish Council and the Parish Meeting will apply the local elements of either Section 106 agreement monies or the CIL. The examiner's report can be found here.</p> <p>We recommend that this policy is deleted and moved to a community action.</p>			
TI-R11	<p>Page 59 – Policy TI2: Sustainable Transport</p> <p>To ensure the policy has the required flexibility we recommend you replace 'must' with 'should'.</p> <p>Evidence needs to be provided to support the recognised congestion points listed in the policy.</p>	VoWHDC	NBP	For discussion in policy review
TI-R12	<p>Page 60 – Policy TI13: Cycle Route 227. Where directly related to the development, financial contributions may be sought via legal agreement towards the improvement of the B4044 cycle route.</p> <p>This policy effectively seeks to safeguard land for the B4044 cycle route, it is important that the policy is supported by appropriate and robust evidence.</p>	VoWHDC	NBP	noted

	It is not clear how financial contributions could be sought towards the improvement of the B4044 cycle route if the cycle route is not there yet. To ensure the policy has to necessary flexibility to deal with this we suggest 'where appropriate' is added to the policy text.			
TI-R13	<p>Page 62 – Policy TI5: Digital Connectivity</p> <p>To ensure the policy has the required flexibility we recommend you replace 'must' with 'should'.</p>	VoWHDC	NBP	For discussion in policy review

What comments do you have on Community Actions?

CA-R1	I note that CPC support the Dean Court Affordable Housing Project. However, the planning policies should be 'tenure blind', as quoted elsewhere, in the sense that the fact that the proposal is for Affordable Housing should not allow the other policies to be waived. The Dean Court Affordable Housing Project has been given consent, although it failed to meet the requirements of policies on special characteristics (DBC1), or to meet the needs of the parish for affordable family homes.	Agree with tenure blind point and maintenance of other policies for affordable housing	NBP	
CA-R2	Getting the community involved is essential. Peas also note that Oxclean could do with some help. the entry and exit verges to the A420 from Eynsham Rad have been terrible for 2 years, it is the same pieces of plastic from two years ago.	Agree – but no further action can be incorporated in the NBP – suggest revert to CPC Environment sub cttee	NBP	
CA-R3	I support the actions that CPC intends to take to address the issues that are outside neighbourhood planning. I feel that the OxCam Expressway would be extremely damaging to Cumnor residents and surrounding landscape. I do not think that Cumnor would be a good site for a park and ride and support identification of alternative sites. A Memorial Arboretum is a good idea. I agree that pavements should not be used for parking. There is an increased level of HGVs going through Cumnor causing noise and vibration which is detrimental to residents. In addition, I feel that the speed limit through Cumnor Village should be reduced to 20 mph for safety reasons. I would also support the other speed limit reductions.	Support for Memorial arboretum and 20mph speed limit in village (especially passing the school)	NBP	
CA-R4	Mustn't lose sight of these in the natural focus on areas where there are defined policies. So how to make these stay	Suggestion: through incorporation in the ToR of the relevant sub cttee	NBP	

	high on the agenda for the Parish Council throughout the lifetime of the Plan?			
CA-R5	A period of transition of these actions into the relevant parish council committees and working groups needs to occur to allow these items to be tracked and delivered positively.	Agree	NBP	
CA-R6	I wish to register my objection to both the OxCam Expressway and the potential Cumnor Park and Ride. I support the speed reduction through Cumnor Village and believe the village itself should be a 20mph zone with the rest of the local roads 30mph zones (including Cumnor Hill)	Support for village 20mph zone	NBP	
CA-R7	The Parish should support any proposals for a foot/ cycle crossing over the Thames at Bablock Hythe or the Pinkhill area.	Agree – would it help the Thames Path navigability overall?	NBP	

Planning services

HEAD OF SERVICE: ADRIAN DUFFIELD



Contact officer: Robyn Tobutt

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14 February 2020

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

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

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

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

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

Yours sincerely

Robyn Tobutt

Robyn Tobutt

Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1	General Comment	We recommend that the policies are presented in boxes so that they are easily distinguishable from the supporting text.
2	Page 7 – Paragraph 4 -being in general conformity with the strategic policies in the local plan (Vale of White Horse Local Plan 2031)	We recommend you replace 'local plan' with 'development plan', to more closely align with the Basic Conditions as set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990.

3	Page 8 – Paragraph 10 Page 11 – Paragraph 31	<p>Comments from our Countryside Officer:</p> <p>In addition to various designated areas listed in these paragraphs it would be worth also recognising that the parish contains part of 3 different Conservation Target Areas (CTA's), including parts of the Oxford Meadows and Farmoor CTA, part of the Oxford Heights West CTA. Conservation Target Areas form Oxfordshire's Ecological Network (see page 141-143 of the Vale LPP1). Details of the CTA's can be obtained from the Thames Valley Environmental Records Centre (TVERC). The CTA's contain important assemblages of designated habitats and populations of important species and should form a focus for efforts to conserve and enhance biodiversity in the Parish.</p>
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4	<p>Page 10 – Paragraph 23</p> <p>-Policy CP4 in Local Plan Part 1 supporting only “limited infill development within existing built areas”.</p>	<p>This is incorrectly referring to Core Policy 4 in the Local Plan 2031 Part 1. Core Policy 4 in the Local Plan 2031 Part 1 states: <i>‘At the Smaller Villages, limited infill development may be appropriate within the existing built areas of these settlements, or if it is allocated within an adopted Neighbourhood Development Plan or future part of the Local Plan 2031. Proposals for limited infill development will be supported where they are in keeping with local character and are proportionate in scale and meet local housing needs, and/or provide local employment, services and facilities.’</i></p> <p>Firstly, as currently written it appears as if “limited infill development within existing built areas” is a direct quote from the policy, this is not the case, as the policy text is set out above.</p> <p>Secondly, this only applies to Smaller Villages, and the designated neighbourhood area</p>
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Ref.	Section/Policy	Comment/Recommendation
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		<p>contains Farmoor, a smaller village, and Cumnor, a larger village. Core Policy 3 in the Local Plan 2031 identifies the settlement hierarchy, in which Farmoor is identified as a Smaller Village and Cumnor is identified as a Larger Village. For Larger Villages Core Policy 4 set sets out, <i>'There is a presumption in favour of sustainable development within the existing built area of Market Towns, Local Service Centres and Larger Villages in accordance with Core Policy 1'</i>. The text should recognise the different settlement hierarchy positions of Cumnor and Farmoor and recognise that different levels of development are appropriate in each.</p>
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5	<p>Page 10 – Paragraph 24</p> <p>Given the increase in housing and the predominant Green Belt nature of the parish, all new development will be from limited infill development and brownfield sites.</p>	<p>This statement is not accurate given the information set out above regarding the position of the settlements within the designated neighbourhood plan area in the settlement hierarchy.</p> <p>The village of Cumnor is identified as a Larger Village and is inset from the Green Belt as identified by Core Policy 13: The Oxford Green Belt, therefore there is a presumption in favour of sustainable development within the existing built area, as set out in Core Policy 3.</p> <p>It could be made clearer that future development is going to be limited by the constraints of the area, e.g. Green Belt, and that this will impact on the location and types of development to come forward.</p>
6	<p>Page 10 – Paragraph 24</p>	<p>Comments from our Affordable Housing Officer:</p> <p>In accordance with the NPPF, a required affordable housing provision percentage, in Vale of White Horse, would be 35% on any site of 10 or more dwellings. This paragraph will therefore need amending from ‘eleven’ to ‘ten’ in order to replicate NPPF requirements.</p> <p>These NPPF requirements will need to be complied with on all development of 10 or more units only, therefore the final sentence of this paragraph will need removing.</p>

7	Page 13 – Paragraph 39	We recommend that you replace ‘inspector’ with ‘examiner’, as the examination is undertaken by an examiner, not an inspector.
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Ref.	Section/Policy	Comment/Recommendation
	These stages include a further formal Public Consultation, Examination by an independent inspector, and exposure of the Plan to a Local Referendum. Provided that these stages are successfully completed, the Cumnor Parish NDP will be ‘made’ and become a formal element of VOWHDC’s Local Plan.	We also recommend that you replace ‘Local Plan’ with ‘development plan’.

8	<p>Page 18 – Policy LGS1: Local Green Space Designation</p> <p>Page 21 – Policy LGS2: Development Affecting Local Green Space</p>	<p>It is only necessary to have one policy on Local Green Space Designations, we recommend that you combine Policy LGS1 and LGS2. The policy should comprise a list of the Local Green Space designations; whilst table 3 is a good resource and we would encourage the inclusion of it in the plan, it is not necessary to have this level of detail in the policy text, it might be more appropriate in the supporting text.</p> <p>We recommend that the policy makes direct reference to the maps, for example:</p> <p>The Cumnor Parish Neighbourhood Plan designates several Local Green Spaces at the following locations:</p> <ul style="list-style-type: none"> i) Farmoor Village (Map 2) ii) Cumnor Hill and Dean Court (Map 3) iii) Cumnor village (Map 4) <p>We recommend you change ‘must’ with ‘should’ to give the policy the required flexibility.</p> <p>We note in your Local Green Space report you have set out all the landowners consulted against each of the sites. However, please be aware that sites may have multiple landowners, for example Vale of White Horse District Council has been identified as the landowner for LGS3, however the land identified is only in part owned by Vale of White Horse District Council. We also</p>
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		<p>note that you have received objections from landowner/s, the NPPG sets out that landowners should be consulted at an early stage and whilst there is no requirement to</p>
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Ref.	Section/Policy	Comment/Recommendation
		<p>remove a Local Green Space if a landowner does not agree, it might be worth strengthening the explanation against the NPPF criteria.</p> <p>Our attention has been drawn to LGS4, as this is an area which has been of particular local interest due to the parking on site. Whilst the parking areas appear green, with a grasscrete type surface used for parking, the area proposed to be designated looks to be a mixture of parking and green space. The NPPF clearly sets out the tests for Local Green Spaces, which will be considered in the examination of the neighbourhood plan. If the examiner does not think the proposed area meets the NPPF tests, they may recommend that it is removed from the plan if it does not meet the tests. Therefore, it may be more appropriate to exclude the parking areas from the Local Green Space Designation to mitigate this risk.</p>

9	<p>Page 22 – Quiet Area Designations</p> <p>Page 25 – Policy QA2: Development Affecting Local Quiet Areas</p>	<p>Having reviewed the ‘Noise Action Plan: Agglomerations (Urban Areas) Environmental Noise (England) Regulations 2006, as amended – 2 July 2019’ and map showing agglomeration areas, we can see that an area of Cumnor is within this. In line with your supporting text this document sets out how eligible local authorities are able to nominate approved Local Green Spaces, delineated in Local or Neighbourhood Plans, for formal identification as Environmental Noise Directive quiet areas. The document clearly sets out the process:</p> <p><i>‘Nominations should be submitted to Defra using the application form at Appendix D, and will be assessed by Defra using the criteria set out in Appendix D. The application form requests information about the location of the proposed quiet area, as well as details regarding the attributes of the space and how the local authority intends to maintain the quietness.</i></p> <p><i>Having reviewed the applications, Defra will formally identify a selection of the nominated spaces as quiet areas, as long as the relevant criteria have been met.</i></p>
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Ref.	Section/Policy	Comment/Recommendation
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		<p><i>Defra will then publish details of any quiet areas that have been formally identified in an appropriately accessible format.'</i></p> <p><i>'In order to be considered as a potential quiet area, a nominated space will first need to have been designated as a Local Green Space in the relevant Local or Neighbourhood Plan, with tranquillity being a factor in its designation.'</i></p> <p>Having reviewed this document it is clear that a quiet area designation is linked to Local and Neighbourhood Plans through Local Green Space designations, but that the process is something that is not done by planning policy, as an application needs to be submitted to Defra. The Local Green Space designation needs to be in place to enable the quiet area designation to take place. It therefore does not appear to be something that can be done through the neighbourhood plan directly, although the neighbourhood plan plays an important role in the process. On this basis, whilst the neighbourhood plan can recognise that parts of the neighbourhood area are subject to the Noise Action Plan, it is not the correct mechanism to designation areas as quiet areas in neighbourhood plan policies, therefore we suggest that this policy is deleted and modified into a community action. The application for quiet area designations should</p>
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		<p>take place once the neighbourhood plan Local Green Space designations are in place.</p> <p>In addition the quiet areas application form states: <i>'Please note that the nominated space must fall wholly within the agglomeration boundary to be considered for formal identification as a quiet area by the Department for Environment, Food and Rural Affairs'</i>. Some of the areas identified are outside the agglomeration boundary and therefore would not meet the requirements.</p>
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10	Page 28 – Policy DBC2: Sustainable Design	We recommend you replace ‘must’ with ‘should’, to give the policy the required flexibility. This flexibility is needed so that applications for planning permission can be determined in accordance with the development plan, unless material considerations indicate
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Ref.	Section/Policy	Comment/Recommendation
		otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990). We recommend you delete paragraph 93 from the policy and inset ‘All’ to paragraph 91.
11	Page 29 – Policy DBC3: Design Cumnor Village Historic Core	For clarity we recommend that you replace ‘must complement’ with ‘should show clearly how they have taken into account’.
12	Page 31 – Policy DBC4: Design in the Rural and Low Density Areas of Cumnor Parish	For clarity we recommend that you replace ‘must complement’ with ‘should show clearly how they have taken into account’. In paragraphs 105 and 107 we recommend you replace ‘must’ with ‘should’ to give the policy the required flexibility to allow applications for planning permission to be considered properly.
13	Page 32 – Map 10 Lower Density Areas of Cumnor Parish	This map could be made clearer to show the areas of Cumnor inset from the Green Belt.

14	Page 33 – Policy DBC5: Infill in the Green Belt	<p>We recommend you delete ‘including in the ‘washed-over’ Green Belt in Cumnor Village’, as Cumnor Village is inset from the Green Belt, as set out in Core Policy 13 of the Local Plan Part 1:</p> <p><i>‘Development will be permitted in the following settlements, which are inset to the Green Belt (as shown on the Adopted Policies Map), where the proposed development is within the existing built area of the village and in accordance with Core Policies 3 and 4:</i></p> <ul style="list-style-type: none"> - <i>Appleton</i> - <i>Botley</i> - <i>Cumnor</i> - <i>Kennington</i> - <i>North Hinksey - Radley, and</i> - <i>Wootton’</i> <p>Paragraph 145 of the NPPF identifies that <i>‘limited infilling in villages’</i> is an exception to inappropriate development in the Green Belt. As worded this policy does not have regard to the NPPF as the policy does not comment on the location or scale, e.g. in villages. We recommend the policy is amended to have</p>
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Ref.	Section/Policy	Comment/Recommendation
		<p>regard to the exception as set out in the NPPF. Wording such as:</p> <p><i>‘The Green Belt will continue to be protected to maintain its openness and permanence. Development proposals in the Green Belt will be determined against principles set out in Core Policy 13: The Oxford Green Belt in the adopted Vale of White Horse Local Plan Part One. Proposals for inappropriate development will not be supported except in very special circumstances.’</i></p> <p>The Green Belt already benefits from a high level of protection through national and local policy and the NPPF sets out that plans should avoid unnecessary duplication of policies. It is not clear what this policy achieves beyond national and local policy.</p>
15	Page 34 – Policy DBC6: Conserving and enhancing nondesignated heritage assets	Paragraph 117 is not achieving anything more than paragraph 116, which in the broader scope of ‘development proposals’ would include ‘alterations and extensions’.

16	Page 34 – Paragraph 119 These have been assessed in accordance with the methodology set out in the Oxford Heritage Asset Register and based on criteria set out in the NPPF, July 2018.	Reference should be made to the most recent version of the NPPF published in February 2019.
17	Page 39 – Policy RNE2: Flood Risk	Comments from the Council's Drainage Engineer: "discharge off site" should be added to the end of paragraph 148. Suggest paragraph 149 is reworded to: <i>"For all major development, sustainable drainage should be suitably designed with the aim to ensure that discharge rates do not exceed greenfield rates with systems designed to add to the area's biodiversity. Systems must be designed with full consideration for future maintenance."</i>
18	Page 42 - Interpretation	Comments from the Council's Drainage Engineer:

Ref.	Section/Policy	Comment/Recommendation
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		<p>Consider the groundwater investigation interpretation onerous if applied to all forms of development. Requiring boreholes and groundwater monitoring for example for a basic extension would unlikely be considered a proportionate response. Recommend the interpretation should relate to all major development.</p>
19	Page 43 – Policy RNE3: Air Quality, Noise & Light Pollution	<p>As worded this policy is overly restrictive and contains less detail than the Local Plan policies. The Local Plan contains the following policies which address these themes:</p> <p>Development Policy 25: Noise Pollution Development Policy 23: Impact of Development on Amenity Development Policy 26: Air Quality Development Policy 21: External Lighting</p> <p>The NPPF is clear that plans should avoid unnecessary duplication of policies (paragraph 16). We recommend that local detail is added to this policy, or the policy deleted from the plan.</p>

20	Page 43/44 – Policy RNE4: Important Views	Please note that policies can only apply to areas within the designated neighbourhood area, therefore you should avoid including views which extend beyond the designated neighbourhood area. Views 19,20,21, and 22 look like they extend beyond the neighbourhood plan area.
21	Page 45 - Interpretation	<p>It might be worth referencing to the Important Views Report to help support the policy.</p> <p>The text in 159 should be amended to more closely align with Policy RNE4: Important Views. We suggest that the focus is on development proposals and applications, not applicants. We also suggest you replace ‘will be required to’ with ‘<i>should</i>’, for example: ‘<i>Applications should have regard to the important views...</i>’.</p>
22	Page 50 – Policy RES1: New Residential Development	This is a broad policy which applies to the whole neighbourhood area, which includes land both within and outside the Green Belt. National and local policy places greater restrictions on development within the Green Belt, which this policy does not have regard to, we recommend

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		<p>you insert <i>‘and where compliant with local and national policy’</i>.</p> <p>It is worth highlighting here our previous comment that Cumnor village is inset from the Green Belt and that the remainder of the area is within the Green Belt, therefore it might be more appropriate to separate these two aspects. For example, a policy for Cumnor village and a policy for outside of Cumnor village.</p>
	<p>i. Infill development within existing built frontages</p>	<p>Currently this is overly restrictive, we recommend you replace ‘within existing built frontages’ with ‘within the existing built-up area’. By saying ‘frontages’ this could restrict other forms of sustainable infill development from being delivered.</p>
	<p>ii. Brownfield sites as per the Vale of White Horse District Council Brownfield Register</p>	<p>In line with the NPPF the neighbourhood plan should promote the effective use of land in meeting the need for homes and other uses. Paragraph 118 sets out that planning policies should:</p> <p><i>‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.’</i></p>

	<p>iii. Refurbishment of agricultural buildings</p>	<p>We encourage you amend this policy point to recognise that it is not just brownfield sites on the Brownfield Register, but other suitable brownfield sites.</p> <p>The refurbishment of agricultural buildings does not relate to the location for sustainable development, it relates to a form of development. We are not sure if refurbishment is the correct term, given something such as replacing rooftiles could be refurbishment. The designated neighbourhood area comprises areas both within and inset from the Green Belt. Most of the rural area of the neighbourhood area is within the Green Belt. The NPPF clearly sets out that inappropriate development is, by</p>
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		<p>definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 145 of the NPPF sets out the exceptions:</p> <p><i>‘a) buildings for agricultural and forestry;</i> <i>b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purpose of including land within it; c) the extension or alteration of a building provided that it does not result in disproportion additions over and above the size of the original building;</i> <i>d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages;</i> <i>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and</i></p> <p><i>g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: - not have a greater impact on the openness of</i></p>
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		<p><i>the Green Belt than the existing development; or</i></p> <p><i>- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'</i></p> <p>Point iii, does not comprehensively cover forms of development which may be appropriate within the neighbourhood plan area, even with the Green Belt covering a portion of the area as set out above. We recommend this policy is amended to reflect the Green Belt exceptions. Text such as:</p> <p><i>'In the Green Belt where they meet one of the exceptions set out in National Policy and Core</i></p>
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Ref.	Section/Policy	Comment/Recommendation
	174. Extension of built areas in the form of ribbon development would not be sustainable and will not be supported	<p><i>Policy 13: The Oxford Green Belt in the adopted Vale of White Horse Local Plan Part One.'</i></p> <p>Outside of the built areas of the settlements, it is open countryside where Core Policy 4: meeting Our Housing Needs of the Local Plan Part One sets out, '<i>development in open countryside will not be appropriate unless specifically supported by other relevant policies as set out in the Development Plan or national policy</i>'. Therefore, in line with Core Policy 4 the extension of built areas, which extend into the open countryside, would not normally be permitted. The policy should avoid duplication and we recommend this sentence is deleted.</p>

23	Page 50 – Paragraph 176	<p>This description of infill development in the supporting text is overly restrictive and we recommend this paragraph is deleted or reworded. Proposals concerning infill development need to be considered on a case by case basis and in line with Core Policy 4 in the Local Plan 2031 Part 1. In relation to Larger Villages (Cumnor) there is a presumption in favour of sustainable development, and at Smaller Villages (Farmoor), proposals for limited infilling development may be appropriate within the existing built area of these settlements. The definition provided in the supporting text is not consistent with local policy or how applications for planning permission are determined. For example, local and national policy does not distinguish between ‘fairly densely development areas rather than a loosely knot area of housing’, and this does not provide the required clarity.</p>
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24	<p>Page 50 - Policy RES2: Residential Mix and Standards</p> <p>Paragraph 178 and 179</p>	<p>We recommend that you change 'must' with 'should' so that the policy has the required flexibility.</p> <p>Comments from our Affordable Housing Officer: The beginning of the second sentence of paragraph 178 should be revised to "Schemes of 10 dwellings or more...". Similarly, paragraph 179 should read "Schemes of 10 or more dwellings must include provision of 35% affordable housing". The final sentence of paragraph 179 will need to be revised or updated to reflect this.</p>
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Ref.	Section/Policy	Comment/Recommendation
	<p>180. Any affordable requirement must be met as an integral part of any development and be tenure blind.</p>	<p>As above, this is not in general conformity with the strategic policies in the development plan. Core Policy 24: Affordable Housing in the Local Plan 2031 Part One sets out that <i>'the Council's preference is for on-site affordable housing provision (with the exception of part units). Only in exceptional circumstances will any other scenario be considered'</i>. The policy then goes on to set out the considerations. The Local Plan policy contains more detail on this, we therefore recommend that 180 is deleted from the policy.</p>

25	Page 51 – Paragraph 182 and 183	Neighbourhood plans should have regard to the NPPF and be in general conformity with the existing Vale of White Horse Local Plan, therefore amendments should not be made to the affordable housing percentage or threshold. In line with the recommendations above from the affordable housing team, this paragraph should be amended to reflect a threshold of 10 or more dwellings.
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26	<p>Page 51 – Policy RES3: Care Homes and Residential Institutions</p> <p>ii. Parking spaces are provided to the side or rear of the new property and not the road frontage</p> <p>iv. There is no adverse impact on residential amenity, including traffic at unsociable hours.</p>	<p>Whilst the policy should encourage the delivery well designed parking solutions, it might be restrictive if the policy wording is too prescriptive. The Vale of White Horse Design Guide recognises that '<i>the suitability of parking solutions will vary depending on the location and nature of the proposal</i>', which might not comprise of parking to the side or rear. We recommend that the wording is amended to ensure the policy has the flexibility to consider the Design Guide and deliver alternative parking solutions if necessary. The policy could encourage the delivery of a certain type of parking but recognise that it might not always be possible.</p> <p>Is it necessary to specifically identify 'including traffic at unsociable hours', is this something associated with care homes and residential institutions? Do you have evidence to support this? If not, we recommend that 'including traffic at unsociable hours' is deleted.</p>
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Ref.	Section/Policy	Comment/Recommendation
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27	<p>Page 55 – Policy EBC1: Business and Employment Facilities</p> <p>197. To maintain a sustainable mix of uses, including local employment opportunities, loss of employment use to residential use will be refused, except where it can demonstrate that continuing employment uses in the location are not economically viable.</p>	<p>We recommend you add <i>‘they comply with other development plan policies and’</i> after ‘supported, providing’. Given that the neighbourhood area contains Green Belt land, some forms of employment development might be inappropriate if they are not one of the exceptions set out in the NPPF.</p> <p>The NPPF sets out that plans should be prepared positively. We recommend that this sentence is re-worded to make it more positive and to more closely align with Core Policy 29: Change of Use of Existing Employment Land and Premises:</p> <p><i>‘To maintain a sustainable mix of uses, including local employment opportunities, the loss of employment uses will only be supported where it can demonstrate that a mixed use enabling development has first been considered and the continuing employment uses in this location are not economically viable.’</i></p> <p>The NPPF sets out that plans should avoid unnecessary duplication of policies. Core Policy 28: New Employment Development on Unallocated Sites and Core Policy 29: Change of Use of Existing Employment Land and Premises from the Local Plan 2031 Part 2 already touch on the themes discussed in this policy. Consider whether it is necessary to</p>
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		<p>include this policy considering the Local Plan already covers this topic and the policy does not add any local detail.</p>
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28	Page 55 – Policy EBC2: Community, Sports & Recreation Facilities	<p>To more closely align with Development Policy 8: Community Services and Facilities in the Local Plan 2031 Part 2 we recommend paragraph 201 is deleted and paragraph 200 is amended to read:</p> <p><i>‘Development proposals for new and extended community facilities, will be supported, particularly where:</i></p> <ul style="list-style-type: none"> <i>i. They are located within or adjacent to</i> <i>the built-up area of an existing settlement</i> <i>ii. The would clearly meet an identified</i> <i>local need, and</i>
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Ref.	Section/Policy	Comment/Recommendation
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	<p>202. Development proposals that would result in the loss of sports pitches and recreational use, will only be supported where it can be demonstrated that an equivalent or better facility is provided within the boundaries of the Parish.</p>	<p><i>iii. They are accessible for all members of the community and promote social inclusion.</i></p> <p><i>Development proposals for new community facilities, including sports and recreational use of open land will be supported provided there is no significant adverse impact on:’</i></p> <p>This policy addresses both community facilities and recreational/sports facilities, however paragraph 202 only deals with recreational use and the policy is silent on the loss of community facilities. Development Policy 34: Leisure and Sports Facilities in the Local Plan 2031 Part 2 and paragraph 97 of the NPPF set out clearly the tests for the loss of recreational land. Paragraph 97 of the NPPF states:</p> <p><i>‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <p><i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i></p> <p><i>b) the loss resulting from the proposed development would be replaced by equivalent</i></p>
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		<p><i>or better provision in terms of quantity and quality in a suitable location; or</i></p> <p><i>c) the development is for an alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'</i></p> <p>As worded the policy does not have to have regard to paragraph 97 in the NPPF. We recommend the policy is amended to more closely align with the NPPF and local policy.</p> <p>The NPPF sets out that plans should avoid unnecessary duplication of policies. Development Policy 8: Community Services and Facilities and Development Policy 34: Leisure and Sports Facilities in the Local Plan 2031 Part 2 already touch on the themes discussed in this policy. Consider whether it is necessary to include this policy considering the</p>
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Ref.	Section/Policy	Comment/Recommendation
		Local Plan already covers this topic and the policy does not add any local detail.
29	Page 56 – Policy EBC3: Farmoor Reservoir	<p>We recommend that the final sentence of 204, ‘suitable uses can include refreshments, watersports facilities, education and other visitor facilities’, is deleted from the policy text. This area of the neighbourhood area is located within the Green Belt and therefore subject to further restrictions and considerations. The NPPF sets out exceptions, one of which is: ‘b) <i>the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green belt and do not conflict with the purpose of including land within it</i>’. We recommend this sentence is deleted as the policy as currently worded could be supportive of forms of development which would not be appropriate in this Green Belt location.</p>

30	Page 59 – Policy Ti1: Infrastructure Priorities	<p>Core Policy 7 in the Local Plan 2031 Part 1 discusses the requirement on new development to provide supporting infrastructure and services. Neighbourhood plans should not repeat local plan policy.</p> <p>A neighbourhood plan can highlight the projects it wishes contributions to go towards, however it cannot be enforceable within a policy. CIL is a budgetary decision made by the appropriate council and it is therefore not possible for a neighbourhood plan policy to direct those contributions to certain infrastructure. The Examiner in the Uffington and Baulking examination recommended that their policy be deleted as it was not a policy and identified the ways in which the Parish Council and the Parish Meeting will apply the local elements of either Section 106 agreement monies or the CIL. The examiner's report can be found here.</p> <p>We recommend that this policy is deleted and moved to a community action.</p>
31	Page 59 – Policy TI2: Sustainable Transport	To ensure the policy has the required flexibility we recommend you replace 'must' with 'should'.
Ref.	Section/Policy	Comment/Recommendation
		Evidence needs to be provided to support the recognised congestion points listed in the policy.

32	<p>Page 60 – Policy TI13: Cycle Route</p> <p>227. Where directly related to the development, financial contributions may be sought via legal agreement towards the improvement of the B4044 cycle route.</p>	<p>This policy effectively seeks to safeguard land for the B4044 cycle route, it is important that the policy is supported by appropriate and robust evidence.</p> <p>It is not clear how financial contributions could be sought towards the improvement of the B4044 cycle route if the cycle route is not there yet. To ensure the policy has to necessary flexibility to deal with this we suggest 'where appropriate' is added to the policy text.</p>
33	Page 62 – Policy TI5: Digital Connectivity	To ensure the policy has the required flexibility we recommend you replace 'must' with 'should'.
34	General	<p>Comment from our Affordable Housing Officer:</p> <p>It is evident from the survey that Cumnor parish would like affordable housing particularly for the people of Cumnor. It is therefore advised that the parish to look at exploring a rural exception site or a community land trust (CLT) with the aim of providing affordable housing to the residents of Cumnor which will remain affordable in perpetuity.</p>

35	General	<p>Comment from our Conservation and Design Officer:</p> <p>I would like to commend them on the excellent Local List of Heritage Assets evidence base they have created. It is a thorough document that is well presented and clear; it really adds to the heritage policies they have written. They should ensure this document is easily accessible and linked directly to the Neighbourhood Plan.</p>
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Important Views Report – November 2019

Ref.	Section/Policy	Comment/Recommendation
36	Whole document	On the whole this document is well presented and clearly sets out the views with a description and picture. There are a few pictures missing for views 19, 22, 28 and 31 and for
Ref.	Section/Policy	Comment/Recommendation
		<p>completeness and to allow the reader to see all the views it would be beneficial to include these.</p> <p>All identified views should be from public rights of way or areas available to the general public. It is not clear if all the views are from publicly accessible points, therefore this should be clarified. It could be something incorporated into the methodology.</p>

37	Map 1 Important Views in Cumnor Parish	We appreciate that views don't just stop at the edge of the parish, however the neighbourhood plan can only have effect within the designated neighbourhood area. Therefore, the plan cannot affect those views which have been identified outside of the designated neighbourhood area.
38	View 5	It is not clear if the picture matches the description provided. For example, the description talks about the foreground being 'highly colourful, with green and yellow arable fields and red farm buildings against the blue sky', this does not appear to be what the picture for view 5 shows.

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