

CUMNOR PARISH  
NEIGHBOURHOOD  
DEVELOPMENT PLAN

SEPTEMBER 2020

CONSULTATION STATEMENT

Published by the Cumnor Parish Council in accordance with the Neighbourhood Planning  
(General) Regulations 2012 (as amended)

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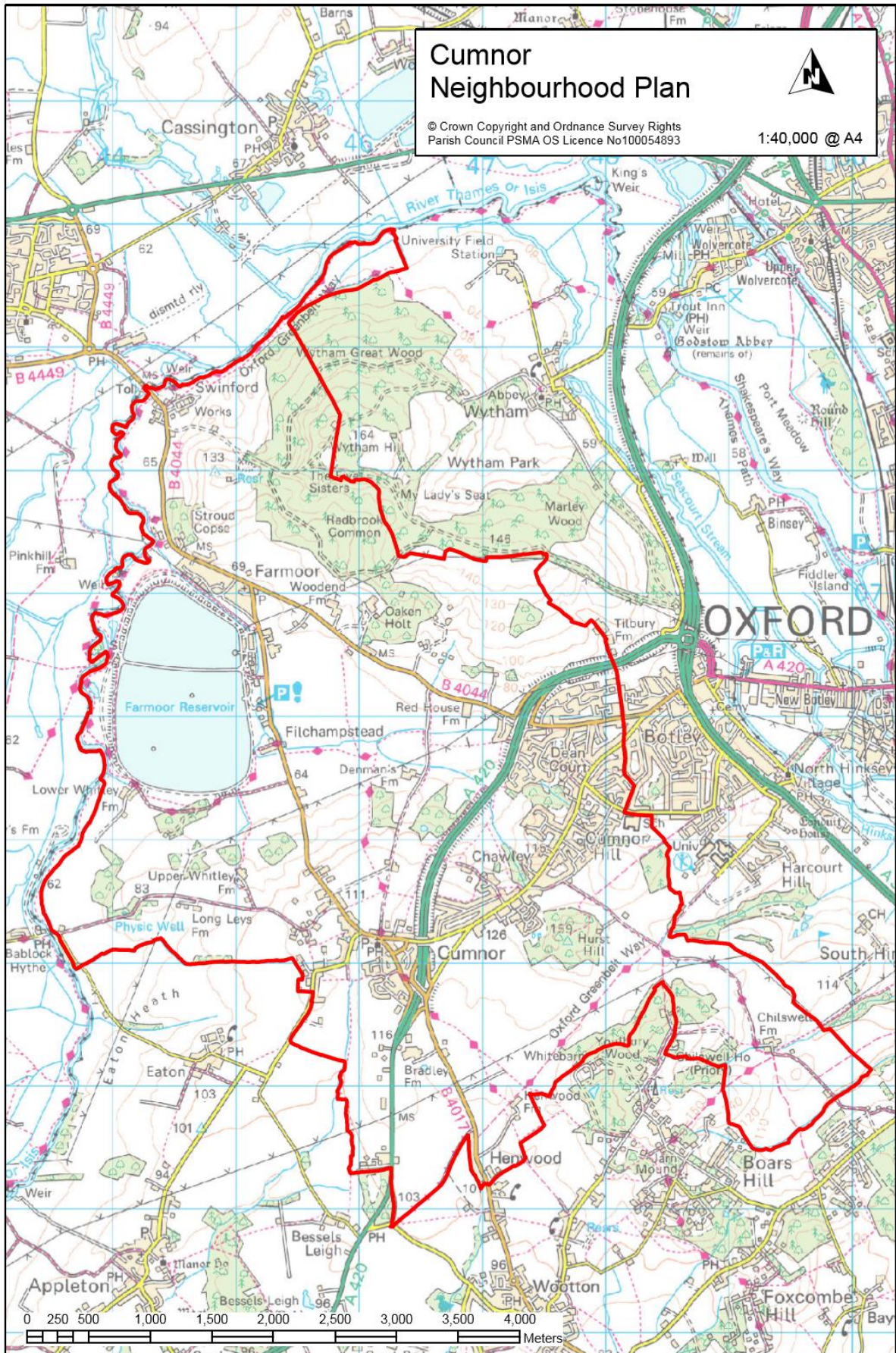
# 1. INTRODUCTION

1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Cumnor Parish Neighbourhood Development Plan 2019 – 2031. The legal basis of this Statement is provided by Section 15 (2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:

- Contain details of the persons and bodies that were consulted about the proposed Neighbourhood Development Plan;
- Explain how they were consulted;
- Summarise the main issues and concerns raised by the persons consulted; and
- Describe how those issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

## **Neighbourhood Plan Area Designation**

1.2 Cumnor Parish Council ('the Parish Council') has prepared a Neighbourhood Development Plan ('Cumnor NP) for the area designated by the local planning authority, The Vale of White Horse District Council (VoWHDC), in January 2017 (see Plan A below).



*Plan A: Cumnor Designated Neighbourhood Area*

## 2. THE CONSULTATION PROCESS

### Timeline of events

- 2.1 The timeline of events below demonstrates the evolution of the Cumnor NP.
- 2.2 Ongoing communications and feedback have been undertaken through regular updates via face to face meetings, the Cumnor Parish News, Facebook, Twitter, email and quarterly newsletters to a distribution group made up of 120 residents. The Parish Council has received and noted minutes and a monthly update from its Neighbourhood Plan Steering Group. Minutes of Steering Group meetings are published on the Parish Council website and can be found at <https://cumnorparishcouncil.org.uk/archive>

### 2016

- The Parish Council decides to begin the process of developing a Neighbourhood Plan in April 2016 and resolves to set up a Neighbourhood Development Plan Steering Group.
- Council members of the Steering Group attend several meetings and Neighbourhood Planning events.
- The Parish Council submits an application to designate a Neighbourhood Area to VWHDC on 9 August 2016. (see Appendix A).
- First public meeting held 7 September 2016 attended by 25 members of the public, VoWHDC and Community First Oxfordshire to discuss potential scope of Cumnor NP.
- Steering Group Terms of Reference approved in October 2016 and revised throughout the project (see Appendix C)
- Second public meeting held 12 November 2016 attended by approximately 120 members of the public and Community First Oxfordshire to recruit members of the public for involvement in the preparation of the Cumnor NP.

### 2017

- Neighbourhood Area for Cumnor Parish designated 12 January 2017 (see Appendix A).
- Steering Group roles agreed, website published (now archived), new material added to Cumnor Parish Council website (see <https://cumnorparishcouncil.org.uk/archive>) and social media pages established (Twitter and Facebook) (see Appendix B).
- Publication of first newsletter February 2017
- Working Groups created in February 2017 to undertake Character Assessments , a separate Local Green Spaces Working Group to audit local green spaces and prepare The Big Survey (see <https://cumnorparishcouncil.org.uk/archive> ).
- Steering Group meets with VoWHDC officers on 8/3/2017 and 22/8/2017.
- Additional Working Group created in September 2017 to gather evidence on the Economy and Infrastructure.
- Working Groups continue to gather evidence and prepare The Big Survey providing regular updates via the Cumnor Parish News, Facebook, Twitter and quarterly newsletters to the distribution group.

### 2018

- The Big Survey invitation was published in January 2018 (see Appendix D) which invited residents to complete a survey by 9 February 2018. More than 1000 residents respond.
- The outcome of The Big Survey was published in July 2018 (see Appendix E).
- Steering Group Terms of Reference revised July 2018 (see Appendix C)
- The Steering Group commission a number of evidence reports and refine the Vision and Objectives in response to the Big Survey throughout 2018.
- The Steering Group invite officers of VoWHDC to attend their meetings. VoWHDC officers attend on 10/5/2018 and 14/11/2018.
- The Steering Group commission planning consultants, Urban Vision, in October 2018 to assist with formulating neighbourhood plan policy and identify gaps in evidence base.

## 2019

- The Steering Group continues to meet and prepare policies for the Cumnor NP throughout the year and identifies evidence gaps
- A Business Survey invitation was published in May 2019 (see Appendix F) which invited businesses in Cumnor to complete a short survey.
- The results presented to the Steering Group in the form of an Economic Activity paper (see Appendix F).
- A Draft Cumnor NP is discussed with officers of VoWHDC 1 August 2019 and informed a screening opinion, the final statement published in October 2019 (see Appendix G).

## 2020

- A six-week Pre-Submission Plan consultation commences on 3 January 2020 until 14 February 2020.
- Virtual meeting with VoWHDC officer 10/9/2020

## **Public and Stakeholder Consultation**

2.3 The Neighbourhood Plan Steering Group has been keen to ensure that the plan provides local residents with a voice as to how their community should grow and be sustainable, whilst continuing to be the strong and vibrant community that exists today.

2.4 Engaging with the community included:

- Holding local events
- Sign-up sheets placed in local shops
- Regular updates in the Cumnor Parish News
- Inviting local groups and organisations to comment
- Paper surveys
- Online surveys – as a supplementary method with the primary method being paper based
- Workshops
- Regular Steering Group Meetings
- Regular updates to the Parish Council
- Face to face meetings with VoWHDC

using the following communication channels:

- Social media – Twitter, Facebook
- Neighbourhood Plan and Parish Council Website
- Local media – Cumnor Parish News - a 48-page magazine, published 10 times a year with a 1300 copy print run. The magazine has 1100 subscriptions, and is additionally sold in 5 local shops and civic locations. Every other year the December issue is distributed to every household in Cumnor Parish
- Flyers/Posters on noticeboards, in shops, community areas, and Churches
- Flyers/Posters posted through every door (2760 households)
- Email (Statutory Consultees in particular and an email distribution list of residents who signed up)
- Parish Council Meetings
- Banners displayed throughout the parish (see photograph below)



2.5 The Steering Group's approach to community engagement can be broadly summarised as shown below:

September 2016 Initial Public Meeting	November 2016 Public Meeting	Ongoing	February 2018 Cumnor Parish Big Survey	January 2020 Consultation Events
<ul style="list-style-type: none"> <li>• 26 invited stakeholders</li> <li>• Mix of landowners, community reps &amp; residents</li> <li>• Facilitated by Community First Oxon</li> </ul>	<ul style="list-style-type: none"> <li>• Open to all</li> <li>• 120 attendees</li> <li>• Facilitated by Community First Oxon</li> </ul>	<ul style="list-style-type: none"> <li>• Monthly article in Cumnor Parish News (distribution 1600 copies)</li> <li>• Quarterly newsletter to distribution group (120 people)</li> <li>• Regular updates &amp; requests for help via Twitter &amp; Facebook</li> </ul>	<ul style="list-style-type: none"> <li>• Sent to every household (2760 in total)</li> <li>• 1003 responses (36% of households)</li> </ul>	<ul style="list-style-type: none"> <li>• Cumnor Old School 4th Jan 2020</li> <li>• Dean Court Community Centre 11th Jan 2020</li> <li>• Farmoor Village Hall 11th Jan 2020</li> <li>• Hard copies available at Botley Library, Farmoor Stores &amp; Dean Court Community Centre</li> </ul>

2.6 In April 2016 the Parish Council agreed to develop a Neighbourhood Development Plan as the way of positively engaging with planning bodies and developers. The Parish Council set up a Steering Group made up of Parish Councillors and local residents, including local landowners. This group coordinated two initial public meetings in September (26 people) and November 2016 (120 people). Both of these events were facilitated by Community First who provided factual guidance and enabled the Steering Group to understand early concerns and issues in the community.

2.7 These ideas, including a Draft vision and priorities were tested with the community in the Big Survey 2018 using the channels listed previously. Over 1000 responses was received, a 36% return rate which is considered extremely good compared to the usual rate of response for surveys of this type (5-10%). With regard to the priorities, the consultation established the community's order of priorities as follows:

1. Protecting and enhancing local green spaces
2. Developing policies to ensure that infrastructure grows in line with population growth (although this was the third priority for residents in Cumnor Village)
3. Maintaining and enhancing the character of our areas (although this was the second priority for residents in Cumnor Village)
4. Positively supporting community facilities

2.8 Additionally, the survey highlighted the main issues were:

#### Housing and development

- Need for 1,2 and 3-bedroom properties
- Lack of affordable housing and housing for key workers
- Concerns over infill and back garden development

#### Travel and transport

- Insufficient car parking in some areas
- Speeding traffic is a problem
- People don't feel safe walking or cycling in the Parish
- Concerns about air quality and traffic noise

#### Local Amenities



- Existing amenities are valued, varied and well used

#### Green spaces, footpaths and environmental issues

- Green spaces and footpaths are well used and valued
- Concerns about aircraft noise and groundwater flooding

2.9 The Neighbourhood Plan Steering Group presented the findings to Cumnor Parish Council at its meeting on Monday 2 July 2018. A final version was sent to residents on the email distribution list, VoHWDC, Oxfordshire County Council (OCC) and Council members. Banners around the parish, posters in Council noticeboards, and article in Cumnor Parish News and Social Media were also used to advertise where the survey results could be viewed.

2.10 In addition to the Big Survey undertaken with the community, a Business Survey was undertaken in 2019 to validate the findings to date. Building on the VoWHDC list of 59 business rate payers in the Parish in the third quarter of 2018, the Steering Group sourced email addresses of 62 businesses in the parish. An online survey link was sent via emails and the information on how to complete the survey was published on the Neighbourhood Plan and Parish Council website and newsletters. A 20% return rate was recorded. The main issues highlighted were:

- Cumnor is a good location for small businesses with the semi-rural location and local facilities (e.g. pubs for business meetings) generally appreciated
- Biggest infrastructure need is good high-speed broadband throughout the whole parish
- Heavy reliance on car transport by employees and clients.

2.11 The engagement process aimed to involve as many local people as possible throughout the various consultation stages so that the Plan was shaped and informed by the views and knowledge of local people and other stakeholders. The Steering Group sought to engage with as wide a range of people as possible, using a variety of approaches and communication and consultation techniques. The results of activities were fed back to local people and available to read (in both hard copy and via the website) as soon as possible after the consultation events.

2.12 Throughout the process the Steering Group has also engaged with VoWHDC to seek advice and guidance through correspondence and face to face meetings.

#### **Pre-Submission Consultation Process**

2.13 The Pre-Submission Plan was published as per the Neighbourhood Planning (General) Regulations 2012 Part 5 Regulation 14 (a), through the channels outlined above, and to the list of organisations as per Neighbourhood Planning (General) Regulations 2012 Part 5 Regulation 14 (b) – see Table A on page 12 for the list of consultees. Copies of the Pre-Submission Plan were sent to VoWHDC as per Neighbourhood Planning (General) Regulations 2012 Part 5 Regulation (c).

2.14 The consultation period lasted for 6 weeks. 75 residents attended the three drop-in events held in the Old School in Cumnor Village, Dean Court Community Centre and

Farmoor Village. 112 responses were received to the online questionnaire, including direct responses to the Google poll and emails. These have been collated into a single summary attached as Appendix H.

### **3. PRE-SUBMISSION FEEDBACK SUMMARY**

3.1 The Pre-Submission Plan consultation generated comments from a number of organisations, including VoWHDC, and the local community. The local community enthusiastically supported the main objectives of the plan.

3.2 The Steering Group assessed each of the 112 responses (each responder having the opportunity to answer and comment on x questions) and identified 93 answers requiring further consideration, of which 66 could be considered by the Group alone with the remaining 27 requiring additional outside professional assistance. Although the comments have not challenged the fundamental principles of the Plan, they have required time to consider how to make those changes.

3.3 The Parish Council appointed experienced neighbourhood planning consultants, O'Neill Homer Ltd, in July 2020 to advise it on how to complete this task. It reviewed the 27 comments and made the following recommendations:

- Remove numbering of paragraphs from policies but retain it for interpretations etc. - policies should stand clear
- Use the language of the local authority used - 'should' rather than 'must', unless there was a good reason to disagree
- Produce policies maps to show where policies apply, both across the Parish and to specific parts of it
- Design areas could be better described - currently design is spread across eight draft policies
- Make policies stronger where necessary and incorporate the work done on identifying non designated heritage assets
- Take out what is repeated from NPPF and instead quote NPPF – but do not attempt to repeat it using different language and sharpen technical language
- Rethink affordable housing quota as current draft would most likely result in rejection by Inspector as not in line with NPPF. Better utilise extensive evidence of lack of affordable housing in a wider range of policies
- Important Views cannot extend beyond parish, those that go over boundaries will need to be removed/limited to within Parish
- Revisit small Local Green Spaces (LGS) areas - advice is that current draft is likely to be rejected at the examination stage as too many LGS proposed and some are too small. A more concise evidence-based list is needed balanced against previous VoWHDC 'Plan Part 1' attempt to remove Green Belt for development.
- Examine and propose ways of incorporating Quiet Area Designations (QAD) into LGS policies

3.4 The recommendations were discussed at Steering Group meetings in July 2020 which resulted in some amendments and further recommendations (see Appendix I). The Steering Group reviewed the amendments and recommendations in July, August and September 2020 and the following modifications were made which are reflected in the submission version of the Cumnor NP, including the creation of a Policies Map and Insets:

- Policy LGS1 – The policy wording has been revised to incorporate old Policy LGS2 and amended to reflect the true effect of designation. The list of designations has been reviewed against the NPPF tests and resulted in the removal of some spaces.
- Policy QA1 – The policy wording has been revised to incorporate old Policy QA2 and amended to reflect identification of candidates for designation. The list has been reviewed against the criteria for designation and resulted in 3 proposed Quiet Areas.
- Policy DBC1 – The policy now incorporates old Policy DBC2, the rural part from old Policy DBC3, part of old Policies DBC4 and RES1 and design elements from old Policy RNE1.
- Policy DBC2 – The policy wording has been revised and re-numbered (old Policy DCB3).
- Policy DBC3 – The policy wording has been revised and re-numbered (old Policy DBC4).
- Policy DBC4 – The policy wording has been revised and re-numbered (old Policy DBC5).
- Policy DBC5 – This is a new policy to identify Lower Cumnor Hill/Third Acre Road as an Area of Special Local Character, which is therefore regarded as a non-designated heritage asset.
- Policy DBC6 – The policy wording has been revised to accommodate comments received.
- Policy DBC7 – The policy wording has been revised and re-numbered (old Policy RNE4). The views identified were limited to those within Parish.
- Policy RNE1 – The design elements from the policy have been deleted and are now covered in a new Policy DBC1 (as outlined above). The policy wording has been revised to focus on green infrastructure as a whole.
- Policy RNE2 – The policy wording has been revised and the Steering Group agreed to accommodate the majority of comments. Where comments recommended that Clause E applies to major development only, the Steering Group consider that there is a strong evidence base to make this a requirement for all development and the policy therefore reflects this.
- Policy RNE3 – deleted due to repeating national and local policy requirements.
- Policy RNE4 – moved into the design section of the plan's policies (now Policy DCB7)
- Policy RES1 – The policy wording has been revised and re-numbered (old Policy RES2). Old policy RES1 incorporated into new Policy DBC1 (as outlined above).
- Policy RES2 – The policy wording has been revised and re-numbered (old Policy RES3).
- Policy EBC1 – The policy wording has been revised to identify a list of facilities and align it with local plan policy. Old Policy EBC1 deleted due to repeating national and local policy requirements.
- Policy EBC2 – The policy wording has been revised and re-numbered (old Policy EBC3).
- Policy EBC3 – The policy has been re-numbered (old Policy EBC4).
- Policy TI1 – The policy wording has been revised and re-numbered (old Policy TI2). Old policy TI1 has been moved to the community action part of the plan.
- Policy TI2 - The policy wording has been revised and re-numbered (old Policy TI3).
- Policy TI3 - The policy wording has been revised and re-numbered (old Policy TI4).
- Policy TI4 - The policy wording has been revised and re-numbered (old Policy TI5).

## 4. INDEX TO APPENDICES

Appendix A – Neighbourhood Planning Area Designation Application

Appendix B – Digital media used for consultation

Appendix C – Steering Group Terms of Reference

Appendix D – Cumnor Parish Big Survey Questionnaire

Appendix E – The Big Survey Results

Appendix F – Business & Community Facilities Report (including economic activity survey)

Appendix G – Screening Statement

Appendix H – Summary of Regulation 14 representations

Appendix I – Recommendations to respond to Regulation 14 representations

## 5. TABLE A REGULATION 14 CONSULTEES

	Statutory Consultation Bodies	Organisation
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Oxfordshire County Council
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Oxfordshire County Council
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	South Oxfordshire District Council Vale of White Horse District Council
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Northmoor Parish Council Stanton Harcourt Parish Council Bessels Leigh Parish Meeting South Hinksey Parish Council Wootton Parish Council Wytham Parish Meeting North Hinksey Parish Council Sunningwell Parish Council Eynsham Parish Council Appleton with Eaton Parish Council
(c)	the Coal Authority;	The Coal Authority
(d)	the Homes and Communities Agency;	Homes England
(e)	Natural England;	Natural England

(f)	the Environment Agency;	Environment Agency
(g)	the Historic Buildings and Monuments Commission for England	Historic England
(h)	Network Rail Infrastructure Limited (company number 2904587);	Network Rail
(h)	Network Rail Infrastructure Limited (company number 2904587);	Network Rail
(i)	a strategic highways company - any part of whose area is in or adjoins the neighbourhood area; (ia) where the Secretary of State is the highway authority for any road in the area of a local planning authority any part of whose area is in or adjoins the neighbourhood area, the Secretary of State for Transport;	Highways England
(j)	the Marine Management Organisation(6);	Marine Management Organisation
(k)	<b>any person -</b>	
(i)	to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and	BT
(ii)	who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	EE
(ii)	who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	Three
(ii)	who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	EMF Enquiries - Vodaphone & O2
(l)	<b>where it exercises functions in any part of the neighbourhood area —</b>	
(i)	a clinical commissioning group established under section 14D of the National Health Service Act 2006;	Oxfordshire Clinical Commissioning Group
(ia)	the National Health Service Commissioning Board;	NHS England
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	Wood Plc (on behalf of National Grid)
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	National Grid
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	Cadent
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	Scottish and Southern Energy Power
(iii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	UK Power Networks
(iv)	a sewerage undertaker; and (v)a water undertaker;	Thames Water - Developer Services

<p>(m) (n) (o) (p) (q)</p>	<p>voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area; bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area; bodies which represent the interests of different religious groups in the neighbourhood area; bodies which represent the interests of persons carrying on business in the neighbourhood area; and bodies which represent the interests of disabled persons in the neighbourhood area.</p>	<p>Bikesafe Cumnor Pre-School Cumnor School Willow Cottage Nursery School Hill End Outdoor Matthew Arnold School Cumnor Minors Botley Boys &amp; Girls Cumnor Cricket Club Cumnor House Care Home Chawley Grove Care Home Oxford Care Home Oakenholt Care Home Shrublands St Michael's Church, Cumnor St Andrews' Church, Dean Court St Mary's Church, Farmoor United Reformed Church, Cumnor Oxford Sailing Club Farmoor Reservoir Farmoor Fishery Cumnor Players Cumnor Historical Society Cumnor Garden Club Cumnor Memories Café Farmoor Photography Club Cumnor Conservation Group Little Fishes Playgroup Cumnor Village Hall Cumnor Old School Dean Court Community Centre Farmoor Village Hall Wytham Woods</p>
	<p>Businesses, Land owners and their representatives</p>	<p>various</p>