

# East Challow Neighbourhood Plan - publicity period

## Response 1

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

7.21 and 7.22 Environment Policies

We strongly support the aim to expand the green corridor along Woodhill Brook.

The Plan would benefit from an additional Policy to "Protect and Enhance Watercourses and Ponds". The importance of Woodhill Brook seems to have been generally overlooked in this plan and that of the Wilts and Berks Canal to have been underestimated. As a tributary to the Childrey Brook and River Ock, Woodhill Brook makes up an important part of the freshwater network in the Thames Catchment. The brook has good potential to form links between priority habitat or as a corridor for priority species (esp water vole present in the River Ock, Childrey Brook, Wilts and Berks canal and nearby Letcombe Brook). Letcombe Brook and The River Ock along with Childrey Brook and the Wilts and Berks canal makes up an important part of the Upper Thames Water Vole Key Area as identified by BBOWT. Woodhill Brook could also contribute to that key area.

VWHDC Core Policy 46 Conservation and Improvement of Biodiversity - "The level of protection and mitigation should be proportionate to the status of the habitat or species and its importance individually and as part of a wider network".

The additional policy could seek to ensure the protection and enhancement of watercourses and ponds by ensuring they are protected from agricultural pollution (run off) and that they are protected from any additional development by suitable buffer zones. Such a policy could also be used to prioritise Biodiversity Net Gain funding opportunities towards the enhancement of these freshwater assets and the important species they support.

As mentioned in the Draft Plan, "minor waterways exist but are poorly maintained or polluted". In the section relating to Community Aspiration, comment O states "Establish Childrey and Woodhill Brooks as green biodiversity channels connecting up to the River Ock. Such a policy would help deliver such an aspiration.

At present both waterways provide important roles in terms of wildlife corridors but are heavily impacted by agricultural activities. Their enhancement (such as improvement in water quality, they are both presently eutrophic) would enable them to support greater biodiversity further enhancing the greater freshwater network of the Thames Catchment.

### Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the East Challow Neighbourhood Plan:

No, I do not request a public examination

### Your details and future contact preferences

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

<b>Title</b>	Mr
<b>Name</b>	[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## Response 2

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Individual

### Your comments

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I fully and wholeheartedly support the East Challow Neighbourhood Plan.

East Challow has been a settlement since the Iron Age, and possibly since the Bronze Age or earlier, with strong Roman connections such as the site of a villa and the obelisk. Positioned right on the edge of the Area of Outstanding Natural Beauty, with features such as the Wiltshire and Berkshire Canal, the Neighbourhood Plan has been meticulously researched, and planned with sensitivity and balance to both the needs of future developments, and preserving not only the character of the village, but the biodiversity and green spaces that are highly important to villagers to ensure the village retains its long held identity, and does not get consumed by the ever increasing march of Wantage and Grove.

This Neighbourhood Plan is important to ensure that the recent overdevelopment that has seen a unsustainable increase of population of over 60% in the last 10 years (see Census from 2011 vs 2021) despite a reduction in social and public amenities that has been a significant detriment to the village, is no longer allowed to run rampant and damage the village still further.

This has been an important and exhaustive piece of work, and I urge you to approve this plan.

Q4. If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

I am in full support of the neighbourhood plan.

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<b>Title</b>	Mr
<b>Name</b>	Steve Gillott
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
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## Response 3

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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Dear Sir/Madam

Vale of White Horse District Council has worked to support East Challow Parish Council in the preparation of their neighbourhood plan and compliments them on a thoughtful and comprehensive plan.

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

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

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

Yours faithfully

[REDACTED]  
Planning Policy Officer (Neighbourhood Planning)

Q3. You can upload supporting evidence here.

- File: 2022-12-20 Reg 16 Response East Challow\_.pdf - [REDACTED]

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Policy and Programmes

**HEAD OF SERVICE: HARRY  
BARRINGTON-MOUNTFORD**



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20 December 2022

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

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Yours faithfully

[REDACTED]

[REDACTED]

**Planning Policy Officer (Neighbourhood Planning)**

Ref.	Section/Policy	Comment/Recommendation
1.	Page 6 paragraph 2.3	<p>We recommend the removal of the word 'landscape' from 2.3 to provide clarity to the sentence and prevent repetition:</p> <p>Community access to the local rural landscape will have been enhanced <del>landscape</del> through improvements in footpaths and other public rights of way (PROW).</p>
2.	Page 7 Principles	<p>Principles 3 and 4 read as if they were NDP Policies rather than principles, particularly due to their use of 'should' rather than the aspirational aims and use of the word 'ensure' in other principles. To provide clarity – i.e., that these are principles rather than policies, we recommend the following amendments:</p> <p>Principle 3 <b>To ensure</b> <del>F</del>urther housing development <del>should</del> <b>benefits</b> the local population either directly or indirectly and development <del>should</del> <b>reflects</b> the housing needs of the local population (i.e. those residing in the Plan Area).</p> <p>Principle 4 <b>To ensure</b> <del>R</del>esidential development <del>should</del> <b>respects</b> and, where possible, <del>aligns</del> with the vernacular architecture in the village and Plan Area.</p>
3.	Page 13 3.7.3	<p>The plan period of VWHDC LPP1 and LPP2 concludes in 2031 but did not commence in 2022; we therefore recommend the following amendments to ensure precision of dates:</p> <p>3.7.3 The Plan was developed with the intended duration from 2022 to 2031, <b>to ensure as much alignment as possible with</b> <del>thus coinciding with the duration</del> <b>plan period</b> of the adopted Vale of White Horse Local Plan (<del>p</del><b>Parts 1 &amp; 2</b>), <b>from 2011-2031</b>.</p>
4.	Page 34 5.9.1	<p>This paragraph refers to the Oxfordshire Plan 2050.</p> <p>We recommend that this reference is deleted as the Oxfordshire Plan 2050 work programme has now ended. Please see the <a href="#">website</a> for details.</p>



5.	Page 36 para 7.2.1	<p>We recommend a minor amendment to ensure clarity of meaning, there is no context regarding 'the development' mentioned otherwise:</p> <p>7.2.1 East Challow is a large rural village which has a strong sense of its identity separate to that of Wantage (Figures 23) and Grove (Figures 24 and 25) with which it lies in close proximity. This sense of separate identity was demonstrated in the initial Village Meeting and the Community Survey (Appendix 4) carried out in June 2017. At the meeting the comment was made that "A number of villagers raised concerns about the impact of <del>the</del> <b>[proposed new]</b> development on the village. One particular concern was that a proposed new development effectively meant that East Challow would effectively connect the village with Wantage and Grove."</p>
6.	Page 37 para 7.2.2	<p>Our Landscape Officer has commented that land described as a 'sparse' landscape, (and that depicted in the photograph at Figure 26) are unlikely to be 'relatively rich in terms of biodiversity', unless there is evidence highlighting this. We therefore recommend the following amendments to 7.2.2:</p> <p>However, these rural parts of the Plan Area comprise a mixture of intensively farmed arable land and grassland/pasture some of which comprises an interesting landscape (Figure 26) which, although sparse, will <del>be relatively rich in terms of biodiversity (Figure 26) and which</del> act as a buffer for the AONB.</p>
7.	Page 44 - Policy L1	<p>Our Development Management Team commented that the draft NDP objectives, principles and table on pages 44 and 45 'seek to maintain the separation of East Challow, particularly from Grove and Wantage and this has been a key objection by residents and the Parish Council in response to planning applications e.g., Fullers Grove and the policy wording may not achieve in practice what seems to be an important principle and objective of the NDP'. They suggested that additional wording is provided to reflect the aim to maintain that separation.</p>

		<p>We note that the made <a href="#">Berrick Salome Neighbourhood Plan</a> Policy BER1 - Settlement Boundaries and Infill Development addresses a similar issue, to ensure that proposals do not unacceptably detract from the separation of two villages. We therefore recommend the following amendments, to ensure the policy provides clarity, to ensure that a decision maker can apply it consistently and with confidence when determining planning applications; and also to provide consistency with the NDP and its objectives as a whole (particularly objective 1, p45):</p> <p>New development should respect the rural landscape setting of the neighbourhood area and the distinctive physical separation between the settlements of East Challow, and Wantage/Grove which contributes to the separate identity of these settlements.</p> <p><b>Development proposals between East Challow and Wantage/Grove should conserve the open and tranquil character of the intervening landscape and its views. Proposals which would either individually or cumulatively, unacceptably detract from the separation between East Challow and Wantage/Grove will not be supported.</b></p> <p>Subject to proposals complying with other policies in the development plan, new residential development will be supported where:</p> <ul style="list-style-type: none"> <li>• It comprises sustainable development within the existing built area of East Challow; or</li> <li>• It is allocated in the <del>Vale of White Horse Local Development Plan, currently in the Local Plan Parts 1 or 2;</del> or</li> <li>• In the case of open countryside, it is limited to that which is considered appropriate development for the open countryside as set out in the development plan and national planning policy.</li> </ul>
8.	Page 45 - Policy L2	As described in our Regulation 14 comments, we recommended the third paragraph of L2 is amended as follows, to provide clarity for decision-makers:

		<p><del>Proposals should reflect the characteristics which define the special character of the AONB, and the individual landscape character areas, including: As appropriate to their nature and scale, development proposals should:</del></p> <p>We also recommend amending points 1 to 12 to reflect the above comment and its tense, for clarity: e.g. amend 'conserving' to 'conserve', 'protecting' to 'protect', etc; and, to ensure consistency, include full stops at the end of each numbered point, as some are missing.</p>
9.	Page 48 - Policy L3	<p>Our Landscape Officer has highlighted that this policy would be difficult to apply with clarity and consistency, with, on the one hand, support being given to development proposals that '<i>recognise and respond positively to the various important views</i>' but in the same paragraph '<i>safeguarding</i>' the views. We therefore recommend the word 'safeguarding' is removed for clarity:</p> <p>Development proposals should preserve or enhance the local character of the landscape and, through their design, height and massing, should recognise and respond positively to the various important views, <del>safeguarding</del> and, where practicable, enhancing them. Development proposals which would have a significant adverse impact on an identified important view will not be supported. The Neighbourhood Plan identifies the following important views which are drawn from the Landscape Character Assessment and Parish Character Appraisal and are shown at Figure 30:</p>
10.	Page 56 – Policy HO1 – Ensuring that further development benefits the existing local population and reflects the needs of the parish	<p>We highlighted in our Regulation 14 comments that developments on any site should meet the need of the whole district unless the site is a rural exception site, where consideration will be given to a specific housing need. We therefore recommended that this policy is reworded to make reference to 'district-wide need' as well as identified local needs, for clarity:</p>

		<p><b>Proposals for residential development should have regard to both the district-wide need and the local housing need as identified in the East Challow Housing Needs Survey.</b></p> <p><b>Where appropriate, proposals should make provision to meet:</b></p> <ul style="list-style-type: none"> <li><b>– the needs of first time buyers and young people (first homes)</b></li> <li><b>– the needs of older people or those with disabilities including new homes that are suitable or capable of adaptation to facilitate lifetime independent living.</b></li> </ul> <p><del>In all new housing developments preference will be given to proposals which fulfil the requirements of the local community, delivering a well-balanced mix of housing types, including needs identified in the East Challow Housing Needs Survey 2020. The identified requirements include providing housing that are suitable for young people ('Starter Homes' or 'First Homes'), supported accommodation for those with disabilities, retirement homes, shared ownership and homes to rent from social landlords.</del></p> <p>To also ensure clarity and consistency, we recommended amending the title of the policy to '<i>Policy HO1 - Local Housing Needs</i>'</p>
11.	Page 61 - Policy D1 – Alignment of development with the vernacular architecture and density in the village and parish	<p>We recommend the following changes for clarity:</p> <ol style="list-style-type: none"> <li>1. Have regard to the VWHDC <b>Joint</b> Design Guide, the Parish Character Appraisal including local character areas, and the Design Code, where appropriate reflecting the local vernacular in the historic parts of the village (including Main Street and Letcombe Hill). New major development should be subject to an agreed Design Code specific to the site, with an agreed overall palette of materials (based on this appraisal or subsequent later appraisals) and suitable house types. Reliance on standard house types and generic designs which do not represent the area are to be avoided; and</li> </ol>

		6. Provide <b>necessary infrastructure to facilitate the delivery of fibre</b> Broadband to the edge of each development plot; and
12.	Page 68 – Policy E1 and Page 69 Policy E2. Development of New Businesses in the Plan Area.	<p>Policy E1:</p> <p>This policy offers support for development that meet a set of requirements. The requirements listed may not always directly relate to the development and/or in some cases while related, may not be fairly and reasonably related in scale and kind to the development - for example, the delivery of super-fast broadband is outside of the control of developers and the delivery of cycle paths may be unduly onerous depending on the nature, scale and location of the development proposed.</p> <p>We note that the plan makes use of the terms “fibre” and “superfast” in relation to broadband and we recommend that references are made consistent with the connection that is aspired to be achieved, in order to ensure clarity and prevent ambiguity.</p> <p>Policy E2:</p> <p>As highlighted in our Regulation 14 comments, Clause 4, which requires that proposals resulting in the loss of existing businesses through change of use/redevelopment should be accompanied by an employment skills and training plan, is beyond the scope of a neighbourhood plan and therefore should be deleted.</p> <p>Regarding meeting access needs, our Development Management Team commented it is currently not clear whether this relates to ‘vehicular, or accessibility for people with a disability, or both. We believe this relates to vehicular access and for clarity we suggest alternative text.</p> <p>Our Development Management Team recommends that the phrase ‘Such businesses must enable reversion to residential use’ is deleted, because permitted development rights can allow conversion to other uses. Additionally, the use of ‘reversion’ indicates that a business was formerly in residential use, which may not be the case.</p>

		<p>Finally, we recommend the requirements for existing and new business development in policies E1 and E2 are combined to provide consistency, leaving policy E2 to cover the loss of existing businesses.</p> <p>We therefore recommend the following changes:</p> <p><u>Policy E1. General Development of Businesses <b>(Existing and New)</b> in the Plan Area</u></p> <p>Proposals to develop existing businesses in the Plan Area, including those within the W&amp;G Estate and Grove Business Park, will be supported and are particularly encouraged where, <del>all of</del> as appropriate to their nature, scale and location, <b>they positively respond to the following conditions principles are met:</b></p> <ol style="list-style-type: none"> <li>1. The development is appropriate to the locality having regard to the requirements of the Neighbourhood and Local Plan and the Design Code for the Plan.</li> <li>2. The development contributes to achieving a transition towards zero carbon activity using <del>solar panels and other forms of energy generation</del> renewable energy sources, better insulation of buildings and installation of charging points for electric vehicles and <del>fibre broadband to the edge of the premises.</del></li> <li>3. The development provides <b>necessary infrastructure to facilitate the delivery of</b> superfast broadband <del>to the business and provides support to provision to other neighbouring businesses.</del></li> <li>4. <b>The development Pprovidinges appropriate connections to active modes of transport including</b> cycle paths <del>access to industrial sites from the village and other local villages, developments, and settlements.</del></li> <li>5. <b>The development makes appropriate contributions</b> <del>Provide support towards improved transport links including more frequent bus services to Grove and improved rail services from Grove.</del></li> </ol>
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		<p>2. The site is not suitable for alternative business uses; and</p> <p>3. The site has been marketed for business purposes at a realistic price for a period not less than 12 months and with no proceedable offers.; <del>and</del></p> <p><del>4. Such proposals are accompanied by an employment skills and training plan which sets out how the developer intends to mitigate the loss of employment impacts that are directly attributable to the redevelopment of the site</del></p>
13.	Page 76 – Para 7.14.4 and Page 77	<p>This paragraph refers to the Oxfordshire Plan 2050.</p> <p>We recommend that paragraphs/sentences referring to the Oxfordshire Plan and its work are deleted as the Oxfordshire Plan 2050 work programme has now ended. Please see the <a href="#">website</a> for details.</p>
14.	Page 77 - Policy CL1	<p>We understand the objective of this policy is to support development proposals for local renewable and low carbon energy generation that help move towards reduced and zero carbon emissions as well as energy self-sufficiency.</p> <p>It is not clear why development proposals should be expected to meet criteria ‘a’ and ‘b’. The first sentence in the second paragraph does not relate to development proposals for energy generation and would be better placed in policy CL2 which encourages innovative approaches to construction. The remainder of the paragraph repeats criterion ‘b’ and should be deleted to avoid duplication. We therefore recommend the following modifications:</p> <p>Support will be given to renewable and low carbon energy generation proposals that:</p> <p><del>a.</del> are led by, or meet the needs of, the East Challow parish community; <del>and</del>.</p> <p><del>b.</del></p> <p><b>Development proposals are encouraged to</b> create opportunities for co-location of energy producers with energy users, in particular heat, and facilitate renewable and low carbon energy innovation.</p>



		<p><del>Development proposals are encouraged to secure a proportion of their total regulated energy from decentralised and renewable or low carbon sources.</del></p> <p><del>Development proposals are also encouraged to create opportunities for co-location of energy producers with energy users and facilitate renewable and low carbon energy innovation.</del> When considering such proposals, regard will be given to the wider benefits of providing energy from renewable sources, as well as the potential effects on the local landscape and environment, including any cumulative impact of these proposals.</p>
15.	Page 78 - Policy CL.2	<p>We recommend addressing low carbon buildings instead of just homes to expand the reach of this policy. We also recommend moving the first sentence of paragraph 2 of Policy CL1 into this policy.</p> <p><u>Policy CL2. Innovative Approaches to Construction</u> Development proposals are encouraged to explore innovative approaches to the construction of low carbon <del>homes</del> <b>buildings</b> which demonstrate sustainable use of resources and high energy efficiency levels</p> <p><b>Development proposals are encouraged to secure a proportion of their total regulated energy from decentralised and renewable or low carbon sources.</b></p> <p>Proposals which seek to provide new homes with installed electric vehicle charging points will be encouraged.</p>
16.	Page 84 Policy FP2. Existing Footways and Cycle Routes	<p>We highlighted in our Regulation 14 comments that (what is now) the penultimate sentence to this policy is overly onerous and should be removed. We suggest alternative wording to help achieve the objective of the text proposed to be deleted.</p> <p>Our Equalities Officer has commented that acknowledgement of accessibility is important, for example, 'new footpaths need to be wide enough for wheelchair users or those with walking aides'. NPPF paragraph 92 explains plans should 'achieve healthy, <b>inclusive</b> and safe places'. We therefore recommend additional text to help achieve this.</p>

		<p>We also recommend a minor amendment to the last (new) sentence, because amending shall to 'should' provides further clarity (i.e. that provision should be made for the crossing points unless there is a very good reason not to have these):</p> <p>Support will be given to proposals that improve and extend the existing footpath and cycle path network, allowing greater access to new housing, the village centre, green spaces and the open countryside. <b>Footpaths should be accessible for wheelchair users and those with walking aides.</b>  <del>The loss of existing footpaths and cycle paths will be resisted.</del></p> <p><b>New development should protect the existing rights of way network and its ambiance. Where public footpaths or cycleways are routed or realigned through new development, they should be designed sensitively to retain their attractiveness.</b></p> <p>Where the Wantage Western Relief Road crosses the route of existing PRoWs, provision <del>shall</del> <b>should</b> be made for suitable pedestrian / cycle crossing points.</p>
17.	<p>Page 85 and 86 Policy FP3. Maintenance of the Wilts and Berks Canal and Associated Infrastructure</p> <p>Policy FP4 – Maintenance of the route and alignment and infrastructure of</p>	<p>We highlighted in our Regulation 14 comments that LPP2 currently safeguards a continuous route corridor for the restoration of the Wilts and Berks Canal, using the historic line wherever possible. Therefore, there is strong policy protection as any proposals will need to demonstrate that the cultural, historic and natural environment will be protected and enhanced, with no overall adverse effect, and that potential impacts on ecology, landscape, flood risk, water resources (abstraction) and water quality have been fully assessed and taken into account.</p> <p>Within development policy 32 of LPP2, there is also consideration of infrastructure and this ensures that development protects the integrity of the canal corridor's alignment and its associated structures.</p>

	the Wilts and Berks Canal	Therefore, although we recognise the importance of the Wilts and Berks canal to the local community, there is already a strong policy on the restoration and protection of the canal. National Planning Policy sets out that policies should serve a clear purpose and duplication should be avoided.
18.	Page 88 – Policy P1	<p>Our Development Management Team has recommended that the words “<i>to ensure that overspill on-street parking does not occur</i>” are removed, because on street parking is outside the control of the planning service.</p> <p>They also recommended that clause 2 is amended to “<i>Proposals should not lead to a reduction in <b>existing designated</b> on- or off-street parking</i>”. This would provide clarity, because the policy does not seem to be aimed at retaining opportunist on street parking but more at retaining parking lay-by’s (e.g., beside the A417).</p> <p><u>Policy P1. Parking Facilities.</u>  All development proposals should have regard to the following matters:  1. Proposals should meet Oxfordshire County Council’s parking standards, providing sufficient parking for residents and visitors <del>to ensure that overspill on-street parking does not occur.</del>  2. Proposals should not lead to a reduction in <b>existing</b> on- or off-street parking.  3. Provision of electric vehicle charging cabling shall be encouraged so that each new dwelling / apartment has direct access to charging facilities.</p>
19.	Page 92 - Environment Policy EV2 - Biodiversity	<p>We highlighted in our Regulation 14 comments a recommendation for Policy EV2 to reflect the Environment Act 2021 which requires all new development to deliver a minimum of a 10% net gain in biodiversity. For precision, we therefore recommend the following amendments:</p> <p>Proposals should be accompanied by surveys which assess the impact of the development on local biodiversity. Development proposals will be expected to demonstrate how they will provide a net gain in biodiversity and, where feasible, habitats and species, <b>and should seek to deliver a minimum biodiversity net</b></p>

		<b>gain of 10%, having regard to the requirements of section 15 of the National Planning Policy Framework.</b> <del>on the site, over and above the existing biodiversity situation.</del>
20.	Appendix 6	<p>Our Infrastructure Team have noted that the Community Facilities Assessment at Appendix 6 sets out priorities for infrastructure improvements, identified through the assessment of each site/facility and supported by the evidence provided within the document. The examiner may wish to invite the NDP group to build on the work undertaken, as the Infrastructure Team recommend 'developing a prioritised table/list of more specific project proposals which clearly set out the scope of each project, anticipated cost of delivery, identified funding sources, feasibility and an indication of whether the projects are required to be delivered in the short, medium or long term. Infrastructure projects identified and prioritised would require a reasonable prospect of delivery'.</p> <p>They have also highlighted the point that 'in considering funding sources it should be noted that S106 obligations may only be used to address/mitigate direct impacts of development, including the provision of infrastructure'.</p>
21.	Appendix 11 – Non designated heritage assets Page 410	<p>We highlighted in our Regulation 14 comments that 'non-designated heritage assets (now numbered 11-15) within the curtilage of the church all date from prior to July 1948 and are therefore protected by the national designation of the church. We would therefore recommend removing these from Appendix 11 to avoid presenting them as undesignated'. We continue to recommend these changes, for clarity and to prevent ambiguity.</p> <p>[As stated, a wealth of information is accessible from the church's listing from Church Care; any further information on the items listed can be added to the church listing through 'enriching the list' (accessible by the link below) which would inform any relevant future applications.]</p>

22.	Appendix 11 Page 410	The Historic England link is broken. We recommend amending to <a href="https://historicengland.org.uk/listing/the-list/list-entry/1048593">https://historicengland.org.uk/listing/the-list/list-entry/1048593</a>
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#### Typographical / Presentational Amendments:

Ref.	Section/Policy	Comment/Recommendation
1.	Page 2	There are a number of 'track change' underlines remaining on the contents page (e.g. in front of 4.8 and 4.9) that need to be removed and 5.6 is set out differently to neighbouring lines; please amend this for overall consistency.
2.	Page 7	We recommend insertion of a comma at 2.8 :  Evidence was gathered, including the earlier community surveys and initial plan.
3.	Page 8 2.11	We recommend the following amendments to 2.11 to provide clarity:  The rationale for a plan is to avoid rapid change which would create problems in community well-being <del>and</del> <b>or</b> for infrastructure provision and to preserve something of value for future residents.
4.	Page 11 3.5.1	We recommend rewording this sentence for clarity:  contains the market town of Faringdon and several larger villages, <b>including</b> of which East Challow is <del>regarded as such</del> (see Figure 2).
5.	Page 12 3.6.1	We recommend the addition of full stops after points 5 and 6 for consistency.
6.	Page 13	We recommend the following amendment for consistency with other titles:  adopted Vale of White Horse Local Plan ( <del>p</del> <b>P</b> arts 1 & 2).
7.	Page 20	We recommend the correction of a minor typographical error:  Figure 9. View of arable land taken from Woodhill Lane looking north- east with Grove business park at far left.
8.	Page 24	We recommend the correction of a minor typographical error:

		Figure 14. The former Nalder manufacturing works (now residential properties), an example of limestone construction.
9.	Page 26	We recommend the correction of a minor typographical error:  Apart from the 12-14th century church, <b>and</b> the early 20th century non-denominational Mission, most of the remaining buildings are private dwellings, including the Old School.
10.	Page 31	Insert missing full stop at the end of principle 1.
11.	Page 35	Insert missing full stops at the end of principles 7, 10, 11 and 12.
12.	Page 36 Para 7.1	We recommend presenting the list of documents as a bullet point list, for ease of reference.
13.	Page 44 table	Under the row 'Justification from evidence base' add a full stop at the end of the paragraph; and under the row 'Policy supported' amend as follows for consistency with other titles: Local Plan <del>P</del> part 2...
14.	Page 62 table	Under the row 'Policy supported' amend as follows for consistency with other titles: Local Plan <del>P</del> part 2...
15.	Page 64	Remove unnecessary full stop  These are also noted in the Character Appraisal (Appendices 2 and 11).
16.	Page 65	Under the row 'Policy supported' amend as follows for consistency with other titles: Local Plan <del>p</del> Part 1 Core Policy 39
17.	Page 69	Under the row 'Policy supported' amend as follows for consistency with other titles: Local Plan <del>p</del> Part 1 Core Policy 28
18.	Page 70	Under the row 'Policy supported' amend as follows for consistency with other titles: Local Plan <del>p</del> Part 1 Core Policy 28
19.	Page 70	We recommend a minor rewording, for clarity:  expanding its facilities for <b>Reception</b> -year <del>zero</del> children.
20.	Page 76	Insert space between 'by2030'.
21.	Page 77	Under the row 'Justification from evidence base' amend as follows for consistency with other titles: key policy 41 in Local Plan <del>p</del> Part 1
22.	Policy CL2 Page 78	Insert full stops at the end of both paragraphs.

23.	Page 83	<p>We recommend the following typographical amendments:</p> <p>Both <b>the</b> Landscape Character Assessment (<b>Aa</b>ll character areas include or are bordered by PRoW) and the Parish Character Appraisal (Green Infrastructure and Open Space) identify the PRoW in the Plan Area (Appendices 1 and 2).</p>		
24.	Page 84	<p>Under the row ‘Policy supported’ amend as follows for consistency with other titles:</p> <p>Local Plan <b>p</b>Part 1 Core Policy 37 Local Plan <b>p</b>Part 2 Development Policy 31</p> <p>The link to the Oxfordshire Health and Well-being Strategy is broken, as it does not pick up all of the letters in the link. For clarity, we recommend amending this to <a href="https://www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf">https://www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf</a></p> <p>The text spacing looks inconsistent in the ‘Justification’ row below and we recommend correcting this to ensure accessibility for those with visual impairments.</p> <table><tr><td>Justification from evidence base</td><td><p>The Oxfordshire Health and Well-being Strategy (<a href="https://www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf">www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf</a>) emphasises the importance to physical and mental well-being of activity including active transport.</p><p>The 25 year Environment Plan (<a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a>) aims to increase access to the countryside for local populations.</p><p>The Landscape Character Assessment (Appendix 1) highlights the importance in maintaining access to the rural landscape by maintaining</p></td></tr></table>	Justification from evidence base	<p>The Oxfordshire Health and Well-being Strategy (<a href="https://www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf">www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf</a>) emphasises the importance to physical and mental well-being of activity including active transport.</p> <p>The 25 year Environment Plan (<a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a>) aims to increase access to the countryside for local populations.</p> <p>The Landscape Character Assessment (Appendix 1) highlights the importance in maintaining access to the rural landscape by maintaining</p>
Justification from evidence base	<p>The Oxfordshire Health and Well-being Strategy (<a href="https://www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf">www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointhwbstrategy.pdf</a>) emphasises the importance to physical and mental well-being of activity including active transport.</p> <p>The 25 year Environment Plan (<a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a>) aims to increase access to the countryside for local populations.</p> <p>The Landscape Character Assessment (Appendix 1) highlights the importance in maintaining access to the rural landscape by maintaining</p>			
25.	Page 85	<p>Insert a full stop after: ...are shown in detail in the Footpaths and PRoW survey (Appendix 7).</p>		

26.	Page 85	<p>Under the row 'Policy supported' amend as follows for consistency with other titles:  Local Plan <del>p</del><b>P</b>art 1 Core Policy 35  Local Plan <del>p</del><b>P</b>art 2 Development Policy 31</p> <p>Insert a full stop after Objective 9: To improve and expand existing footways and cycle routes).</p>
27.	Page 86	<p>Under the row 'Policy supported' amend as follows for consistency with other titles:  Local Plan <del>p</del><b>P</b>art 1 Core Policy 45</p> <p>Insert a full stop after Objective 10: Protect the canal corridor as a recreation and wildlife habitat.</p>
28.	Page 87	<p>Under the row 'Policy supported' amend as follows for consistency with other titles:  Local Plan <del>p</del><b>P</b>art 1 Core Policy 45.</p>
29.	Page 90	<p>Remove the space between wet and land for consistency with the rest of the wording:  7.21.5 The Plan Area also has areas of wet-land and potential wetland</p>
30.	Page 91	<p>Insert a full stop after  Objective 12: To maintain and enhance the existing green corridors and their relationship with the natural environment.</p>
31.	Page 92	<p>Remove capital letter:  It is also supported by the Local Plan Part 1 Core Policies 45-46 (<del>S</del>seeking a net gain...</p>
32.	Page 93	<p>Insert a full stop in clause q for consistency with the other clauses</p> <p>q) A safe footpath to the W&amp;G estate and the convenience shop at Mellor's Garage from the village centre.</p>
33.	Page 94	<p>Appendices list – remove full stop for consistency with the rest of the list:</p> <p>Appendix 11. Non-Designated Heritage Assets.</p>



## Response 4

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from SSE. Please see below:

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

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

### Your details and future contact preferences

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

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	Network Connections Planning Engineer
<b>Organisation (if relevant)</b>	Scottish and Southern Electricity Networks
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	1 Woodstock Road
<b>Address line 2</b>	Yarnton
<b>Address line 3</b>	-
<b>Postal town</b>	Kidlington
<b>Postcode</b>	OX5 1NY
<b>Telephone number</b>	-
<b>Email address</b>	[REDACTED]@sse.com

## Response 5

### Respondent Details

[Redacted]	
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Historic England. Please see below:

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

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

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

Please do contact me, either via email or the number above, if you have any queries.'

### Your details and future contact preferences

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

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	Historic England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Canon Bridge House
<b>Address line 2</b>	25 Dowgate Hill
<b>Address line 3</b>	-
<b>Postal town</b>	London
<b>Postcode</b>	EC4R 2YA
<b>Telephone number</b>	-
<b>Email address</b>	[REDACTED]@HistoricEngland.org.uk

[REDACTED]

[REDACTED]

## Response 6

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from The Coal Authority. Please see below:

'Thank you for your notification below regarding the East Challow Neighbourhood Plan Consultation.

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As Vale of White Horse District Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.'

### Your details and future contact preferences

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

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Planning and Development Manager
<b>Organisation (if relevant)</b>	The Coal Authority
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	200 Lichfield Lane
<b>Address line 2</b>	Mansfield
<b>Address line 3</b>	-
<b>Postal town</b>	-
<b>Postcode</b>	NG18 4RG
<b>Telephone number</b>	-
<b>Email address</b>	planningconsultation@coal.gov.uk

## Response 7

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Thames Water.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 12-12-22 Thames Water.pdf - [REDACTED]

### Your details and future contact preferences

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

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





E: [REDACTED]@thamewater.co.uk  
M: +[REDACTED]

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

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

12 December 2022

## Vale of White Horse District – East Challow Neighbourhood Plan 2022-2031 Submission Version

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

### **Paragraphs 7.14.5-7.14.6 Comments on Water Supply and Wastewater/Sewerage Infrastructure**

We support paragraphs 7.14.5 - 7.14.6 as they are in line with our previous representations. However, we consider they should be strengthened in line with the following:

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

As mentioned in paragraph 7.14.6, Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. The website referred to at footnote 16 has been updated and the following should be used:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy to support paragraphs 7.14.5-7.14.6. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

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

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

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

#### **Water Efficiency/Sustainable Design**

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Policy CNP13 part 252 should be updated as follows:

***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

## **Comments in relation to Flood Risk and SUDS**

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

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in

helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

## **Development Sites**

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

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

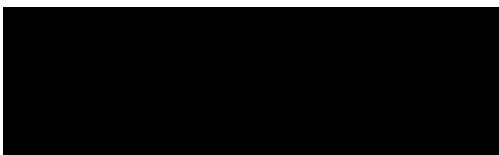
It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may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

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

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

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

Yours faithfully,





Thames Water Property Town Planner

## Response 8

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from National Highways. Please see below:

'Thank you for inviting National Highways to comment on the above Consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34.

We have reviewed the above consultation and have 'No Comments'.

Please send any future correspondence relating to spatial planning issue to our team's inbox at: [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk)

### Your details and future contact preferences

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

<b>Title</b>	■
<b>Name</b>	■■■■■
<b>Job title (if relevant)</b>	Assistant Spatial Planner (Area 3)
<b>Organisation (if relevant)</b>	National Highways
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Bridge House
<b>Address line 2</b>	Walnut Tree Close
<b>Address line 3</b>	-
<b>Postal town</b>	Guildford
<b>Postcode</b>	GU1 4LZ
<b>Telephone number</b>	-
<b>Email address</b>	■■■■■@nationalhighways.co.uk

## Response 9

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

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Response received via email from Network Rail.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 16-12-22 Network Rail.pdf [REDACTED]

### Your details and future contact preferences



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

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	Town Planning Technician Wales and Western
<b>Organisation (if relevant)</b>	Network Rail
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	1st Floor
<b>Address line 2</b>	Bristol Temple Point
<b>Address line 3</b>	-
<b>Postal town</b>	Bristol
<b>Postcode</b>	BS1 6NL
<b>Telephone number</b>	-
<b>Email address</b>	[REDACTED]@networkrail.co.uk

**Whiteley, Rosalynn**

---

**From:** [REDACTED]@networkrail.co.uk>  
**Sent:** 16 December 2022 10:11  
**To:** Planning Policy S&V  
**Subject:** East Challow NDP

---

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

---

OFFICIAL



Network Rail  
1<sup>st</sup> Floor  
Bristol Temple Point  
Bristol  
BS1 6NL

My Ref: P/TP21/

Your Ref:

Date: 16 December 2022

**TOWN AND COUNTRY PLANNING ACT 1990 (as amended)**

**APPLICATION NO:**

**PROPOSAL: East Challow Neighbourhood Development Plan**

Dear Sir/Madam,

Thank you for consulting us on the East Challow NDP. This email forms the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Level Crossings

**Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.**

There is one level crossing just outside the plan area which could be affected by development:

1. Public Bridleway known as Grove (MLN1)

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that *"...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway"* (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Yours Sincerely,



Town Planning Technician Wales and Western

\*\*\*\*\*  
\*\*\*\*\*

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If you have received this email by mistake, please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.

\*\*\*\*\*  
\*\*\*\*\*

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## Response 10

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

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Response received via email from Natural England.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 16-12-22 Natural England.pdf [REDACTED]

### Your details and future contact preferences

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<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Sustainable Development Lead Adviser
<b>Organisation (if relevant)</b>	Natural England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Red Kite House
<b>Address line 2</b>	Howberry Park
<b>Address line 3</b>	Crowmarsh Gifford
<b>Postal town</b>	Wallingford
<b>Postcode</b>	OX10 8BD
<b>Telephone number</b>	-
<b>Email address</b>	██████████@naturalengland.org.uk

## Whiteley, Rosalynn

---

**From:** [REDACTED]@naturalengland.org.uk>  
**Sent:** 16 December 2022 10:35  
**To:** Whiteley, Rosalynn  
**Subject:** East Challow Neighbourhood Plan- Regulation 14 Submission

---

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

---

Dear Rosalynn

Application ref: East Challow Neighbourhood Plan- Regulation 14 Submission

Our ref: 412999

Thank you for consulting Natural England on the East Challow Neighbourhood Plan- Regulation 14 Submission . We have no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully

[REDACTED] - Sustainable Development Lead Adviser  
Thames Solent Team  
Natural England

Red Kite House  
Howbery Park  
Crowmarsh Gifford  
Wallingford  
Oxfordshire  
OX10 8BD

My normal working hours are 9am-3pm Monday to Friday

0300 060 3900

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

██████████ - Sustainable Development Lead Adviser  
Thames Solent Team  
Natural England

Red Kite House  
Howbery Park  
Crowmarsh Gifford  
Wallingford  
Oxfordshire  
OX10 8BD

My normal working hours are 9am-3pm Monday to Friday

0300 060 3900

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

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# Response 11

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Agent

## Your comments

<p>Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email from National Grid.</p> <p>Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 22-12-22 National Grid.pdf - [REDACTED]</li></ul>

## Your details and future contact preferences

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

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	Director
<b>Organisation (if relevant)</b>	Avison Young
<b>Organisation representing (if relevant)</b>	National Grid
<b>Address line 1</b>	Central Square South
<b>Address line 2</b>	Orchard Street
<b>Address line 3</b>	-
<b>Postal town</b>	Newcastle upon Tyne
<b>Postcode</b>	NE1 3AZ
<b>Telephone number</b>	-
<b>Email address</b>	<a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a>



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NE1 3AZ

T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

[avisonyoung.co.uk](http://avisonyoung.co.uk)

Our Ref: MV/ 15B901605



16 December 2022

Vale of White Horse District Council  
[planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)  
**via email only**

Dear Sir / Madam

**East Challow Neighbourhood Plan - Regulation 16 Consultation  
November – December 2022  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

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

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

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

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

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

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



### **Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:

[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

### **Further Advice**

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**[REDACTED], Director**

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

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

**[REDACTED], Town Planner**

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

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[REDACTED]

[REDACTED]

**Director**

**0191 269 0094**

**[REDACTED]@avisonyoung.com**

**For and on behalf of Avison Young**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

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

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

## Response 12

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Oxfordshire County Council.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 22-12-22 OCC.pdf - [REDACTED]

### Your details and future contact preferences

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

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

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

**District:** Vale of the White Horse

**Consultation:** East Challow Neighbourhood Plan 2022 – 2031 (Submission Document)

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**Annexes to the report contain officer advice.**

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**Overall View of Oxfordshire County Council**

The County Council supports the Parish in its ambition to update their neighbourhood plan.

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

**Officer's Title:** Principal Planner

**Date:** 22 December 2022

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

**District:** Vale of White Horse

**Consultation:** East Challow Neighbourhood Plan 2022 – 2031 (Submission Document)

**Team:** South and Vale Locality

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

**Officer's Title:** Principal Planner

**Date:** 16/12/2022

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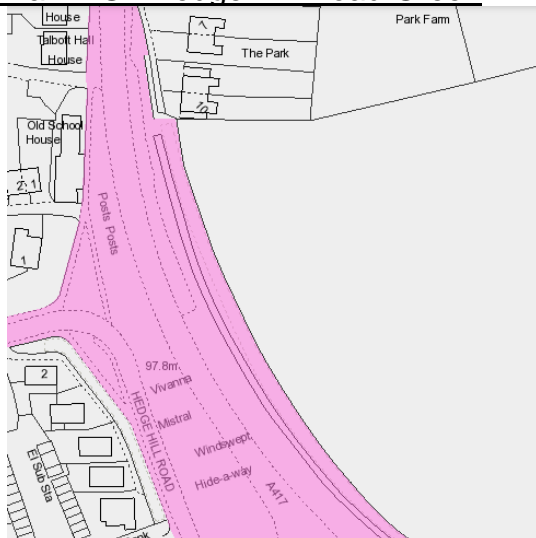
## **Strategic Comments**

The County Council would re-iterate at this submission stage of the Neighbourhood Plan, their objection to Hedge Hill Road Green (LG7) and Letcombe Hill Green (LG8) to being designated as Local Green Spaces. This objection has been raised in October 2021 via letter (see Annex 2) and in our response to the pre submission neighbourhood plan in December 2021. It is therefore disappointing to have to re-iterate this objection at the submission stage of this plan.

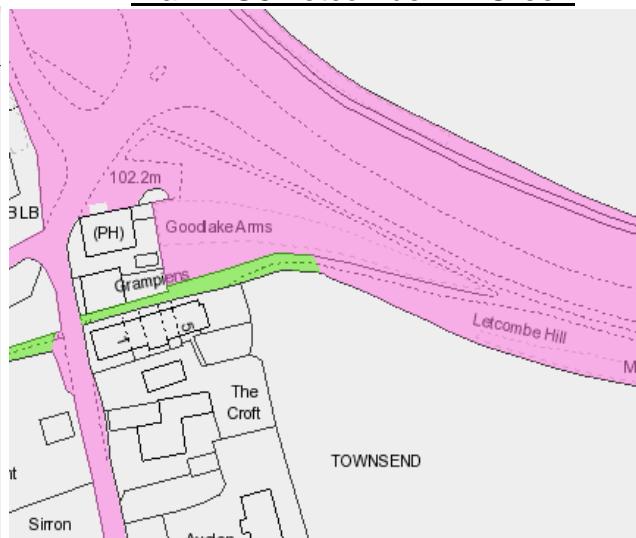
### **L4 Local Green Spaces (and Appendix 9 Local Green Spaces)**

Oxfordshire County Council were informed, as the landowners, on 24<sup>th</sup> September 2021 via an emailed letter, that Hedge Hill Road Green (LG7) and Letcombe Hill Green (LG8) were proposed to be designated as Local Green Spaces. The County Council do own a large part of these two sites, but not the entirety of either. However, both Hedge Hill Road Green (LG7) and Letcombe Hill Green (LG8) are wholly part of the maintained highway (they are within highway land and the County Council is the relevant Highway Authority).

**Plan: LG7 Hedge Hill Road Green**



**Plan: LG8 Letcombe Hill Green**



The plans above show the extent of maintained highway (shaded pink). This information can be found directly on the mapping tool on this webpage: [Map of streets we maintain | Oxfordshire County Council](#)

Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way.

Oxfordshire County Council responded with an emailed letter (contained in Annex 2) on 8<sup>th</sup> October 2021, stating that LG7 and LG8 should not be designated as Local Green Spaces due to the fact they are part of the maintained highway. We would again take this opportunity to request that these two sites; LG7 and LG8 are not designated as Local Green Spaces due to the reasons outlined above. Therefore, the County Council objects their inclusion as Local Green Spaces in the pre-submission East Challow Neighbourhood Plan.

Appendix 9 Local Green Spaces notes that for LG7 Hedge Hill Road Green and LG8 Letcombe Hill Green the owners for both sites have been contacted but doesn't record that their majority owner does not agree to their designation.

**District:** Vale of White Horse

**Consultation:** East Challow Neighbourhood Plan 2022 – 2031 (Submission Document)

**Team:** South and Vale Locality

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

**Officer's Title:** Transport Planner

**Date:** 14/12/2022

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## **Transport Strategy Comments**

We note that our comments on the pre-submission version have been addressed and incorporated into the submission version.

There is additional wording in the submission version that we would like to comment on:

### **Policy FP2. Existing Footways and Cycle route** (page 84)

*Where the Wantage Western Relief Road crosses the route of existing PRowS, provision shall be made for suitable pedestrian / cycle crossing points*

### **Community Aspirations** (page 93)

*v) Wantage Western Relief Road - provision to be made for shared cycle / pedestrian paths along the route of the relief road to ensure access by a range of means to Grove and the re-opened railway station.*

OCC Comment: The Wantage Western Relief Road is safeguarded in the Vale of White Horse Local Plan 2031 Part One. There are no plans to deliver the relief road at this time, however, if requirements for it and the delivery mechanisms have been identified, then the requests made in the policy and community aspirations above would be considered in line with policies set out in the OCC's Local Transport and Connectivity Plan.

### **Community Aspirations** (page 93)

*u) Creation of a pedestrian/cycle route to Grove Business Park along Woodhill Lane.*

OCC Comment: The creation of this pedestrian/cycle route would provide a good link between East Challow and Grove Business Park, however, Woodhill Lane is not within Highway and the PRow does not cover the entire length of Woodhill Lane. Therefore, although it is a good idea there could be challenges with its deliverability as third-party land acquisition would be necessary.

## **ANNEX 2**

Councillor Paul Barrow  
East Challow Neighbourhood Plan Steering Group  
[Paul.Barrow@whitehorsedc.gov.uk](mailto:Paul.Barrow@whitehorsedc.gov.uk)

County Hall  
New Road  
Oxford  
OX1 1ND

Copy: [REDACTED] [@southandvale.gov.uk](mailto:[REDACTED]@southandvale.gov.uk)  
[REDACTED] [@southandvale.gov.uk](mailto:[REDACTED]@southandvale.gov.uk)

8<sup>th</sup> October 2021

Dear Councillor Barrow,

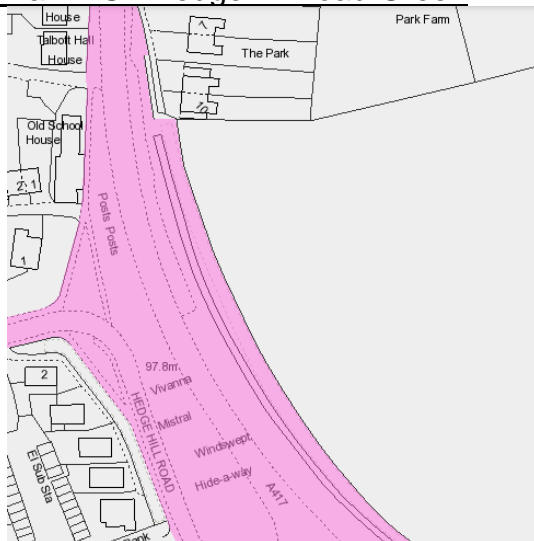
**East Challow Parish – Neighbourhood Plan – Potential Sites for Local Green Space Designation: Hedgehill Road Green (LG7) and Letcombe Hill Green (LG8)**

Thank you for your email and letter received on 24<sup>th</sup> September.

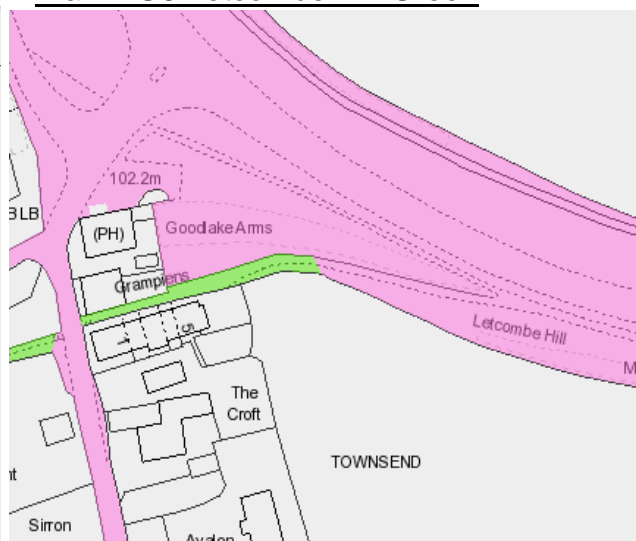
The County Council do own a large part of the above sites, but not the entirety of either. However, both Hedgehill Road Green (LG7) and Letcombe Hill Green (LG8) are wholly part of the maintained highway (they are within highway land and the County Council is the relevant Highway Authority). Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way.

The plans below show the extent of maintained highway (shaded pink). This information can be found directly on the mapping tool on this webpage: [Map of streets we maintain | Oxfordshire County Council](#)

Plan: LG7 Hedgehill Road Green



Plan: LG8 Letcombe Hill Green



Your letter of 24<sup>th</sup> September sought our views on the proposed designation of these two sites as Local Green Spaces. **The County Council's view is that these two sites, Hedgehill Road Green (LG7) and Letcombe Hill Green (LG8), should not be designated as Local Green Spaces due to the fact they are part of the maintained highway.**

It is hoped that there is enough time for these two sites to be removed from consideration for Local Green Space designations before planned East Challow Neighbourhood Plan pre-submission consultation in November. If these two sites were shown as Local Green Spaces designations within the draft Neighbourhood Plan, then unfortunately the County Council would have to object to this for the reasons above. I have copied in two colleagues from the Neighbourhood Planning Team who I hope can advise you further on this point.

I hope this helps and please be assured that the County Council supports the Parish in its ambition to prepare a neighbourhood plan and looks forward to receiving the further details of the plan's pre-submission consultation in due course. For further details explaining County services relevant to neighbourhood planning please see: [Neighbourhood planning guide | Oxfordshire County Council](#)

Yours sincerely

[Redacted Signature]

[Redacted Name]

**Planner**

Email: [Redacted] [@oxfordshire.gov.uk](mailto:[Redacted]@oxfordshire.gov.uk)

General Email: [PlanningInOxfordshire@oxfordshire.gov.uk](mailto:PlanningInOxfordshire@oxfordshire.gov.uk)

## Response 13

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

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Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from the Wilts & Berks Canal Trust.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 22-12-22 Wilts & Berks Canal Trust.pdf [REDACTED]

### Your details and future contact preferences



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

<b>Title</b>	-
<b>Name</b>	[REDACTED]
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	Wilts & Berks Canal Trust
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Dauntsey Lock Canal Centre
<b>Address line 2</b>	Dauntsey Lock
<b>Address line 3</b>	-
<b>Postal town</b>	Chippenham
<b>Postcode</b>	SN15 4HD
<b>Telephone number</b>	-
<b>Email address</b>	[REDACTED]@wbct.org.uk

\_\_\_\_\_

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## **East Challow Neighbourhood Plan 2022 – 2031 Submission Version April 2022**

### **Comments from: Wilts & Berks Canal Trust**

Address: Dauntsey Lock Canal Centre, Dauntsey Lock, Chippenham, SN15 4HD

Contact: [REDACTED] – for [REDACTED], Head of Planning for WBCT

E-mail: [REDACTED]@wbct.org.uk

Telephone: 01865 862671; Mobile: [REDACTED]

### **Background to Comments**

The objectives of the WBCT are to protect, conserve and improve the route of the Wilts & Berks and North Wilts Canals, and branches, for the benefit of the community and environment, with the ultimate goal of restoring a continuous navigable waterway linking the Kennet and Avon Canal near Melksham, Wiltshire, the River Thames near Abingdon, Oxfordshire and the Thames and Severn Canal near Cricklade, Wiltshire. The aim is to create a sustainable and bio-diverse blue and green corridor that provides a host of attractive life style and economic benefits to our communities and to visitors, as well as providing a safe and welcoming habitat for wildlife.

The Wilts & Berks Canal is a major heritage restoration project which includes some new lengths of canal where the original route is now inaccessible. A Restoration Strategy for the Completion and Future Development of the Wilts & Berks Canal has been produced and is supported by all the local authorities along the line of the canal through the Wiltshire Swindon and Oxfordshire Canal Partnership. Already several kilometres of canal and canal towpath have been restored. Work is ongoing along the canal and completed works include a new connection to the River Thames just south of Abingdon. The length of the canal through the Vale of White Horse is recognised and protected in the Vale of White Horse Local Plan, Policy DP32: The Wilts & Berks Canal.

The restoration of the Wilts & Berks Canal is a major green and blue infrastructure scheme which will provide significant environmental, recreational, community and economic benefits right across the Vale of White Horse District and beyond. Canal restoration provides a route for cycling and walking, an enhanced environmental resource, opportunity for increased biodiversity, an increased and attractive leisure space and is of general benefit to creating healthy communities. The work of restoration is a focus for community participation and development enabling a wide range of people to engage in positive activities, which can be continued in on-going maintenance. We believe that restoration of the canal will bring significant benefits for the local communities along its length, including East Challow.

The Wilts & Berks Canal passes through the middle of East Challow Parish, and the plan area, and the WBCT has been active in enhancing and maintaining aspects of this section of the canal and promoting its restoration in the long term. We therefore

have a keen interest in the planning of the Parish and any prospective development that may affect the canal.

## **Comments on Pre-Submission Version**

In December 2021, WBCT submitted comments on the East Challow Neighbourhood Plan 2021 – 2031 Pre-Submission Version. Those comments are attached as an annex to this response.

Our comments are included in the Consultation Statement, Volume 2 Appendices, at pages 87 to 91. However, this does not show the whole of our submitted comments; it only includes the first three pages listing those parts of the plan we support. It does not include pages 4 and 5 which gave our comments on what we saw as an omission from the plan and some other comments where we suggested rewording. We note that no changes have been made to the plan in response to these comments and it would seem that pages 4 and 5 of our response may not have been taken into consideration.

## **Comments on the Submission Version**

### **Support for the Plan**

We are pleased to note that the East Challow Neighbourhood Plan recognises the importance of the Wilts & Berks Canal as a green corridor and its historic, cultural, recreation, wildlife and carbon absorption value; and that it is broadly supportive of restoration of the canal and recognises this would provide additional benefits to the parish and village, in particular from tourism.

WBCT generally supports the Submission version of the Neighbourhood Plan. In line with our earlier comments, we particularly support the following parts of it:

Page 33, paragraph 5.7.2, Principle 10.

Page 34, paragraph 5.9.2.

Page 34, paragraph 5.9.3, Principle 12.

Page 35, Objectives 5, 9, 10 and 12.

Page 35, Objective 9.

Page 42, paragraph 7.2.9.

Page 45, Policy L2; in particular the inclusion of Point 9.

Page 48, Policy L3; in particular the inclusion of points 3, 4 and 5.

Page 50, Policy L4; in particular the inclusion of LG-2 Canal East and LG-3 Canal West.

Pages 81 to 83, paragraphs 7.16.5 to 7.16.9.

Page 83, Policy FP1; in particular the requirement that new developments should integrate with the current green infrastructure network.

Page 84: Policy FP2.

Page 85, Policy FP3: in particular we welcome the statement that the Wilts and Berks Canal is regarded by the Parish as a recreation area and a wildlife habitat; and we strongly support the requirement that all new development should ensure that its value to the community for these purposes is maintained and enhanced.

Page 86, Policy FP4: in particular we strongly support the requirements that “New development should avoid conflicting with the historic route of the Wilts and Berks Canal unless an alternative alignment of the canal can be provided as part of the development”; and that “Development should avoid impacting adversely on the infrastructure of the Canal”; and we welcome the change in wording of the final sentence, as suggested in our comments on the pre-submission version.

## Changes Sought to the Plan

### Omission of Policy on Restoration of the Wilts & Berks Canal

On page 10 of Appendix 2 to the Plan, East Challow Parish Character Appraisal, it is stated: “The restoration of the canal is understood to be a key priority for residents and consideration should be given to future improvements in Neighbourhood Plan policies”. We very much welcome this statement and would expect to see it reflected in the Plan. However, the principles, objectives and policies of the submission version of the Plan do not seem to include explicit support for restoration of the canal, beyond safeguarding of the route and infrastructure. We therefore wish to see changes made to the Plan to include policy support for restoration of the canal to a fully navigable waterway, including where opportunities arise for this to be done as part of or in conjunction with development of adjacent or nearby land. This could be done by the following changes to principle 10, objective 10 and policies FP3 and FP4:

**Principle 10** (paragraph 5.7.4, page 33) – change to: “To ensure that the historic Wilts and Berks Canal, a part of which passes through the parish, is maintained in terms of structural integrity and relevant infrastructure for its historic and cultural value, as a biodiverse corridor and for recreational purposes, and that its restoration to a navigable waterway is promoted and enabled.”

**Objective 10** (paragraph 6.2.1, page 35) – change to: “To protect the canal corridor as a recreation and wildlife habitat, and to support and encourage restoration of the Wilts and Berks Canal to a navigable waterway.”

**Policy FP3** – change to: “The Wilts and Berks Canal is regarded by the Parish as a recreation area and a wildlife habitat and restoration of the Canal to a navigable waterway is strongly supported. All new development should ensure that its value to the community for these purposes is promoted, maintained and enhanced.”

**Policy FP4** – insert a new sentence between the first and second parts of the policy: “Development should be compatible with and complimentary to future restoration of the Canal to a navigable waterway and, where possible, should enable and contribute to its restoration.”

**Paragraph 7.16.9 (page 83) – potential benefits of development to canal restoration**

We consider that the first part of this paragraph should be amended to make it clear that the section of canal that has been ‘restored’ in Swindon in conjunction with development is largely a newly constructed section of canal on a new canal alignment, rather than a restoration of the original canal. This is why it may appear that there has been less emphasis on biodiversity in that location.

In South Swindon, Wichelstowe, the canal restoration is a mix of restoring the old route and building a new route forming part of a major diversion to the south of the town. WBCT restored part of the old route, starting over 20 years ago, some of it being in the Wichelstowe development area and some outside. All canal construction in the last 15 years has been by the Wichelstowe project developer. This includes a total length of about 3.4km of which only 800m is the original canal line. The biodiversity of the canal is considered as a part of the environmental mitigation and improvement for the whole project of over 4000 houses. This includes a 5m wildlife corridor and waterside planting along the canal. It should however be borne in mind that the original planning consent was gained in 2013 when biodiversity requirements were less than now.

We therefore wish to see the following rewording of paragraph 7.16.9:

“The Wilts and Berks Canal Trust recognises the potential benefits to canal restoration of housing and other built development as has taken place in south Swindon, Wichelstowe, where a new section of functioning waterway on a new canal alignment has been constructed in conjunction with the surrounding new development. In this urban context, provision for biodiversity has been considered and made as part of an overall package of environmental mitigation for the whole development project, including a 5m wildlife corridor and waterside planting along the canal. Further canal restoration and any new canal construction will need to include provision for increased biodiversity in line with current legal and planning policy requirements. The restoration and operation of canals as functioning waterways across the UK has shown that restored canals have benefits for both recreation and tourism and increased biodiversity.”

We wish to be notified of the Council’s decision on whether to formally adopt the Neighbourhood Plan.

22.12.2022

**East Challow Parish Council**

**East Challow Neighbourhood Plan 2021 – 2031 Pre-Submission Version  
Consultation November 2021**

**Response from: Wilts & Berks Canal Trust**

Address: Dauntsey Lock Canal Centre, Dauntsey Lock, Chippenham, SN15 4HD

Contact: [REDACTED] – for [REDACTED], Head of Planning for WBCT

E-mail: [REDACTED]@wbct.org.uk

Telephone: 01865 862671; Mobile: [REDACTED]

Thank you for giving the Wilts & Berks Canal Trust (WBCT) the opportunity to comment on the East Challow Neighbourhood Plan 2021 – 2031 Pre-Submission Version. As you are aware, the Wilts & Berks Canal passes through the middle of East Challow Parish and the WBCT has been active in enhancing and maintaining aspects of this section of the canal and promoting its restoration in the long term. We therefore have a keen interest in the planning of the Parish and any prospective development that may affect the canal.

**Background to Comments**

The objectives of the WBCT are to protect, conserve and improve the route of the Wilts & Berks and North Wilts Canals, and branches, for the benefit of the community and environment, with the ultimate goal of restoring a continuous navigable waterway linking the Kennet and Avon Canal near Melksham, Wiltshire, the River Thames near Abingdon, Oxfordshire and the Thames and Severn Canal near Cricklade, Wiltshire. The aim is to create a sustainable and bio-diverse blue and green corridor that provides a host of attractive life style and economic benefits to our communities and to visitors, as well as providing a safe and welcoming habitat for wildlife.

The Wilts & Berks Canal is a major heritage restoration project which includes some new lengths of canal where the original route is now inaccessible. A Restoration Strategy for the Completion and Future Development of the Wilts & Berks Canal has been produced and is supported by all the local authorities along the line of the canal through the Wiltshire Swindon and Oxfordshire Canal Partnership. Already several kilometres of canal and canal towpath have been restored. Work is ongoing along the canal and completed works include a new connection to the River Thames just south of Abingdon. The length of the canal through the Vale of White Horse is recognised and protected in the Vale of White Horse Local Plan, Policy DP32: The Wilts & Berks Canal.

The restoration of the Wilts & Berks Canal is a major green and blue infrastructure scheme which will provide significant environmental, recreational, community and

economic benefits right across the Vale of White Horse District and beyond. Canal restoration provides a route for cycling and walking, an enhanced environmental resource, opportunity for increased biodiversity, an increased and attractive leisure space and is of general benefit to creating healthy communities. The work of restoration is a focus for community participation and development enabling a wide range of people to engage in positive activities, which can be continued in on-going maintenance. We believe that restoration of the canal will bring significant benefits for the local communities along its length, including East Challow.

## **Support for the Plan**

We are pleased to note that the East Challow Neighbourhood Plan recognises the importance of the Wilts & Berks Canal as a green corridor and its historic, cultural, recreation, wildlife and carbon absorption value; and that it supports the restoration of the canal and recognises the additional benefits this would provide to the parish and village, including from tourism.

WBCT generally supports the Pre-Submission version of the Neighbourhood Plan. We particularly support the following parts of it:

**Page 32, para. 5.7.2, Principle 10:** To ensure that the historic Wilts and Berks Canal, a part of which passes through the parish, is maintained in terms of structural integrity and relevant infrastructure for its historic and cultural value, as a biodiverse corridor and for recreational purposes.

**Page 33, para. 5.9.2:** Recognition that the Wilts & Berks Canal is an important green corridor and is a popular walking route for local people.

**Page 33, para. 5.9.3, Principle 12:** To ensure that the Plan Area preserves and enhances its natural environment and landscape, particularly maintaining and increasing natural green corridors for recreation, biodiversity and carbon absorption.

**Page 34, Objective 5:** To protect and maintain the historic and heritage assets of the Plan Area.

**Page 34, Objective 9:** To improve and expand existing footways and other rights of way and cycle routes.

**Page 34, Objective 10:** To protect the canal corridor as a recreation and wildlife habitat.

**Page 34, Objective 12:** To maintain and enhance the existing green corridors and their relationship with the natural environment.

**Page 40, para. 7.2.9:** Recognition that the Wilts & Berks Canal is important as a green corridor for recreation, biodiversity, carbon sequestration and as a contributor to mental and physical well-being for the local population that should be maintained.

**Page 43, Policy L2:** Ensuring that the Village Remains a Part of an Essential Rural Landscape. We support the inclusion of Point 9: "Protecting and enhancing the special, often wooded, character of the Wilts and Berks Canal corridor" as one of the characteristics of the parish that development proposals should reflect.

**Page 45, Policy L3:** Preservation of Important Views and Vistas. We support the inclusion of points 3, 4 and 5: “Views from the Wilts and Berks Canal corridor ...” as being important views that should not be significantly adversely impacted.

**Page 47, Policy L4.** Local Green Spaces. We support the inclusion of LG-2 Canal East and LG-3 Canal West as areas to be designated as Local Green Spaces.

**Page 72, para. 7.16.3:** Recognition that the Wilts & Berks Canal currently provides local residents with a valuable footpath for recreation purposes, forming a section of the Vale Way. and a corridor for wildlife.

**Page 73, para. 7.16.4:** The statement that the Wilts and Berks Canal Trust intends to restore the canal between Swindon and Abingdon and that this would provide additional benefits to the parish and village from tourism.

**Page 73, para. 7.16.5:** Recognition that there are some original infrastructure elements relating to the canal still remaining.

**Page 73, para. 7.16.6:** Recognition that canal restoration can produce both tourism benefits and increased biodiversity; and the statement that maintenance and improvement of the canal is a key aim for the community, in line with Principle 10 and Objective 10.

**Page 73, Policy FP1:** Integration of Public and Community Transport with Community Facilities and Green Infrastructure. We particularly support the requirement that new developments should integrate with the current green infrastructure network.

**Page 74: Policy FP2:** To Improve and Expand Existing Footways and Cycle Routes.

**Page 75, Policy FP3:** Maintenance of the Wilts and Berks Canal and Associated Infrastructure. We welcome the statement that the Wilts and Berks Canal is regarded by the Parish as a recreation area and a wildlife habitat. We strongly support the requirement that all new development should ensure that its value to the community for these purposes is maintained and enhanced.

**Page 76, Policy FP4:** Maintenance of the Route and Alignment and Infrastructure of the Wilts and Berks Canal. We strongly support the requirements that “New development should avoid conflicting with the historic route of the Wilts and Berks Canal unless an alternative alignment of the canal can be provided as part of the development”; and that “Development should avoid impacting adversely on the infrastructure of the Canal”.

However, we are not sure of the practicality of the final part of this policy: “Where impacts are unavoidable the infrastructure should be removed and reused in any alternative alignment of the Canal”. Where diversions and new alignments of the canal are needed, we aim to build to a higher standard, meeting current safety and construction requirements, and the inclusion of historic infrastructure from the original canal line may not be compatible with this. We therefore request that the final sentence be reworded: “Where impacts are unavoidable the infrastructure should be removed and where possible and practical reused in any alternative alignment of the Canal”.



## **Omission from the Plan**

On page 10 of Appendix 2 to the Plan, East Challow Parish Character Appraisal, it is stated: "The restoration of the canal is understood to be a key priority for residents and consideration should be given to future improvements in Neighbourhood Plan policies". We very much welcome this statement and would expect to see it reflected in the policies of the Plan. However, the policies of the pre-submission plan do not seem to include explicit support for restoration of the canal, beyond safeguarding of the route and infrastructure. We therefore ask that, in drafting of the next (submission) version of the Plan, consideration is given to the inclusion of a policy supporting restoration of the canal to a fully navigable waterway, including where opportunities arise for this to be done as part of or in conjunction with development of adjacent or nearby land. This could be done by the amendment of an existing policy, e.g. policy FP3 or FP4. We would be happy to be involved in discussing possible wording of such a policy.

## **Other Comments:**

**Paragraph 7.16.4:** The first weblink in this paragraph does not work because there is a break in the word Abridged.

**Paragraph 7.16.6:** We would like the first part of this paragraph to be amended to make it clear that the section of canal that has been 'restored' in Swindon in conjunction with development is largely a newly constructed section of canal on a new canal alignment, rather than a restoration of the original canal. This is why it may appear that there has been less emphasis on biodiversity in that location.

In South Swindon, Wichelstowe, the canal restoration is a mix of restoring the old route and building a new route forming part of a major diversion to the south of the town. WBCT restored part of the old route, starting over 20 years ago, some of it being in the Wichelstowe development area and some outside. All canal construction in the last 15 years has been by the Wichelstowe project developer. This includes a total length of about 3.4km of which only 800m is the original canal line. The biodiversity of the canal is considered as a part of the environmental mitigation and improvement for the whole project of over 4000 houses. This includes a 5m wildlife corridor and waterside planting along the canal. It should however be borne in mind that the original planning consent was gained in 2013 when biodiversity requirements were less than now.

We suggest the following rewording of this paragraph:

"The Wilts and Berks Canal Trust recognises the potential benefits to canal restoration of housing and other built development as has taken place in south Swindon, Wichelstowe, where a new section of functioning waterway on a new canal alignment has been constructed in conjunction with the surrounding new development. In this urban context, provision for biodiversity has been considered and made as part of an overall package of environmental mitigation for the whole development project, including a 5m wildlife corridor and waterside planting along the canal. Further canal restoration and any new canal construction will need to include provision for increased biodiversity in line with current legal and planning policy requirements. The restoration and operation of canals as functioning

waterways across the UK has shown that restored canals have benefits for both recreation and tourism and increased biodiversity.”

23.12.2021

## Response 14

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the East Challow Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Blenheim Strategic Partners.

Please see attachments.

Q3. You can upload supporting evidence here.

- File: 22-12-22 Blenheim A.pdf - [REDACTED]
- File: 22-12-22 Blenheim B.pdf - [REDACTED]

### Your details and future contact preferences

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

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Head of Planning
<b>Organisation (if relevant)</b>	Blenheim Strategic Partners
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	The Estate Office
<b>Address line 2</b>	Blenheim Palace
<b>Address line 3</b>	-
<b>Postal town</b>	Woodstock
<b>Postcode</b>	OX20 1PP
<b>Telephone number</b>	-
<b>Email address</b>	██████████@blenheimstrategic.com

22<sup>nd</sup> December 2022

Planning Policy Team  
Vale of White Horse District Council  
Abbey House  
Abbey Close  
Abingdon  
OX14 3JE  
Sent via email only: [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)

Dear Sir/ Madam,

### **East Challow Neighbourhood Plan Submission version consultation (Regulation 16)**

On behalf of Blenheim Strategic Partners, please find enclosed a representation in response to the consultation on the submission version East Challow Neighbourhood Plan in accordance with Regulation 16 The Neighbourhood Planning (General) Regulations 2012.

### **The site**

Blenheim Strategic Partners have an interest in land at Bablakes, East Challow (SHELAA reference EACH06). The site to which this submission relates is located to the west of King Alfreds School and to the south of Challow Road, a Location Plan of the site can be found in Appendix 1. The site comprises 13.02 hectares of land – made up of agricultural land with a large barn in the north of the site.

### **Response to the Regulation 16 Consultation**

Blenheim Strategic Partners strongly supports neighbourhood planning and its role in strengthening the ability of communities to plan for themselves and as such, make the following comments:

As worded, Policy L3 does not meet the basic conditions.

There is no national or local policy requirement for all development to preserve or enhance the character of the landscape. Whilst of course, development should respect local character and should respond positively to its attributes, Policy L3 imposes vague and ambiguous requirements on all development without any evidence to demonstrate that these requirements are deliverable. The Policy conflicts with Paragraph 16 of the National Planning Policy Framework (the Framework), which requires plans to be deliverable. The approach is also contrary to national guidance, which requires policies to be clear and concise, not vague and ambiguous.

Further, there is no substantive evidence to demonstrate that it is necessary or even possible for development to meet the requirements of Policy L3 in the above regard. The Policy thus imposes planning obligations which fail to have regard to – and conflict with – Paragraph 57 of the Framework.

There is no substantive information in respect of what a “*significant adverse impact*” is. As well as being vague and ambiguous, contrary to national guidance, this part of Policy L3 fails to make it evident as to how a decision maker should react to development proposals. As set out, this part of the Policy is open to wide interpretation and there is no guidance as to how significance, adversity or impacts might be judged, who by, or on what basis. Policy L3 does not meet the basic conditions in this regard.

Views change annually, seasonally, monthly, daily and even hourly. The Plan provides photographs essentially showing open spaces and greenery. If it is the intention of the plan to simply sterilise such land from development, it should seek to designate the land as such. Instead, Policy L3 seeks to impose a wholly vague and ambiguous approach to preventing development which would have an unmeasurable and wholly subjective impact on “*important views*.” There is wholly insufficient information in respect of how all development might safeguard or enhance “*important views*” and no information to demonstrate that such an approach would be deliverable, having regard to Paragraph 57 of the Framework.

Whilst to some degree, specific aspects relating to outlook can form part of a comprehensive landscape and visual impact assessment, simply affording subjective levels of protection to subjective “*views*” does not result in a precise or deliverable planning policy. For the reasons set out above, such an approach conflicts directly with national guidance and policy; and it places an obstacle in the way of the Neighbourhood Plan’s contribution to the achievement of sustainable development.

As worded, Policy L3 does not meet the basic conditions and the Neighbourhood Plan cannot proceed to Referendum without modification to the Policy.

Notwithstanding all of the above, it is clear that plan-makers are rightly seeking to protect the special and distinctive qualities of the Neighbourhood Area. It is possible for landscape character to be protected and for locally recognised views to be recognised and afforded status through land use planning policies in a way that meets the basic conditions and to achieve this, a change to Policy L3 along the following lines is suggested:

- **Delete the first paragraph of Policy L3 and replace with “*Development proposals must respect landscape character and must respect and respond positively to identified important views.*”**

In the above way, Policy L3 can be modified in a way such that it can meet the basic conditions and provide a positive land use planning framework that achieves local aspirations in an appropriate, lawful, manner in respect of local character, landscape and identified views.

## **Concluding Comments**

Blenheim Strategic Partners have an interest in land at Bablakes, East Challow to which this submission relates are committed to working with both East Challow Parish Council and Vale of White Horse District Council on the delivery of high-quality residential development that meets the aims and objectives of both the emerging joint Local Plan 2041 for South Oxfordshire and Vale of White Horse District Councils and the East Challow Neighbourhood Plan.

It is our view that the submission version East Challow Neighbourhood Plan fails to meet the Basic Conditions for the following reasons:

- Policy L3 is not clear and unambiguous, and therefore, does not provide a clear framework for where development will be considered acceptable – fails to have regard to national policy and does not meet Basic Conditions

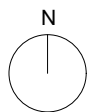
This representation is submitted in the spirit of ensuring that the Neighbourhood Plan meets the basic conditions. Blenheim Strategic Partners recognises the important role that the East Challow Neighbourhood Plan will have as part of the Development Plan for the Neighbourhood Area and looks forward to its success at referendum.

I trust the above is clear and we look forward to receiving confirmation that the submission has been received in due course. Should you have any questions regarding the enclosed information, please don't hesitate to contact me.

Yours faithfully,

Blenheim Strategic Partners

## **Appendix 1 – Location Plan**



0 10 20 30 40  
SCALE

Title	
Land part of Bablakes Farm, East Challow	
Scale: —	1:2,500 @ A4
Date: —	09/01/2020
Drawn by: —	RF
<b>BLENHEIM</b> STRATEGIC PARTNERS	

