

Sutton Courtenay Parish Council's (SCPC's) responses to clarification requests from Andrew Ashcroft (Independent Examiner)

Please note Sutton Courtenay Parish Council's responses in red text 6/9/2023

Sutton Courtenay Neighbourhood Development Plan

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear and concise vision for the neighbourhood area. It is underpinned by a series of background documents which directly inform some of the policies.

The presentation of the Plan is very good. The difference between the policies and the supporting text is very clear. The Plan makes good use of various high-quality maps.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification both with the Parish Council and with the District Council.

The comments made on the points in this Note will be used to assist in the preparation of the examination report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

Questions for the Parish Council

I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

Policy SC1

This policy has generated a significant degree of commentary from the District Council and the development industry. The latter part of this note provides an opportunity for the Parish Council to comment on individual representations. However, for the purpose of this policy please can the Parish Council comment on the following matters:

- the weight which it has given to the contents of the Didcot Garden Town Delivery Plan;

Whilst not an adopted Planning document, the Didcot Garden Town Delivery Plan, the plan, and its contents were endorsed by Vale of White Horse District Council (VoWHDC) at a joint Scrutiny Committee meeting on 5th and 6th October 2017, with South Oxfordshire District Council (SODC).

A further review of the Plan took place by the Scrutiny Committee on 23rd – 24th 2022, whereby some of the projects were reduced in scale or removed.

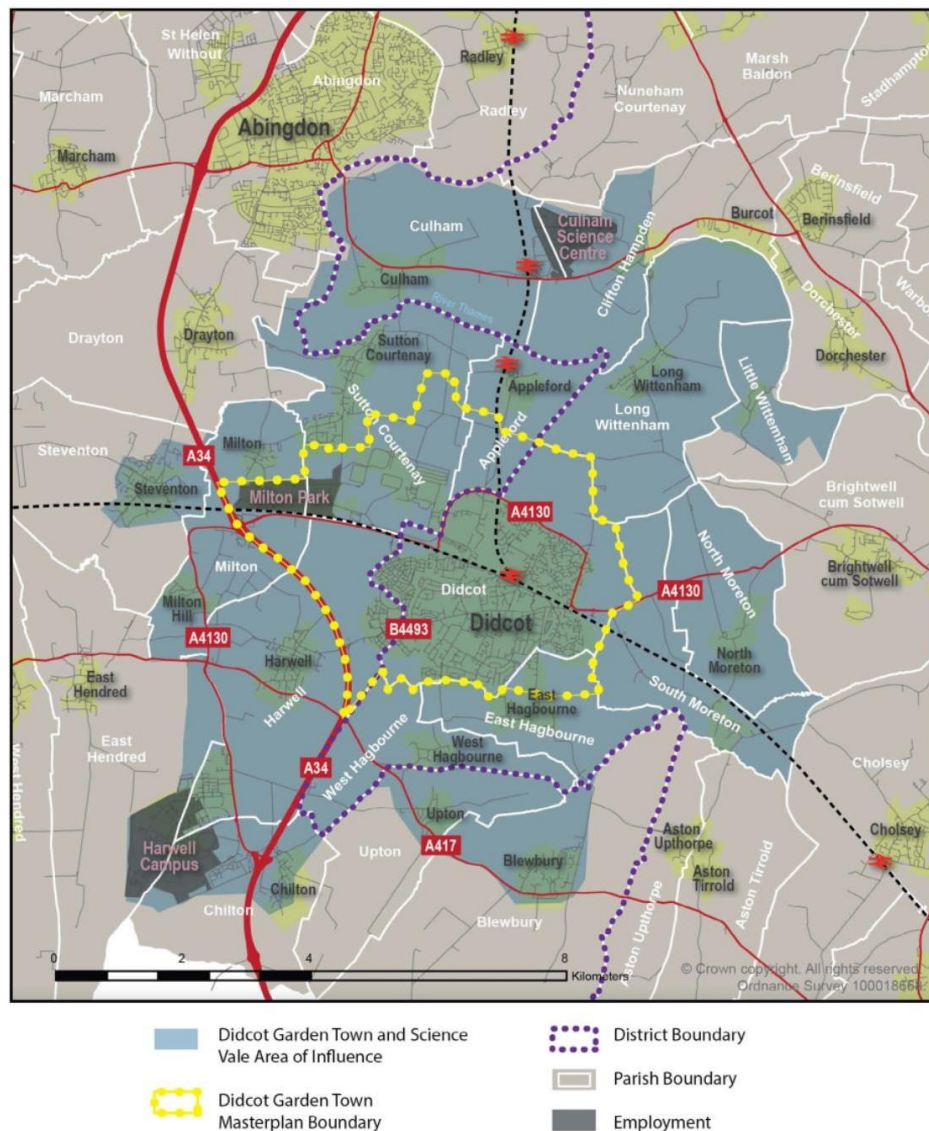
Therefore, whilst the original plan holds no weight in planning terms, it does highlight the direction in which both District Councils are intending to develop the area and how they envisage the surrounding villages being influenced by the development.

In this regard, as the Garden Town Delivery Plan covers both Local Authority (LA) areas, both Adopted Local Plans have been reviewed in the preparation of Sutton Courtenay Neighbourhood Plan (NP).

The Plan Area clearly falls within the 'Zone of Influence' as defined in Appendix 6 of the Adopted SODC Local Plan 2035 below.

Appendix 6

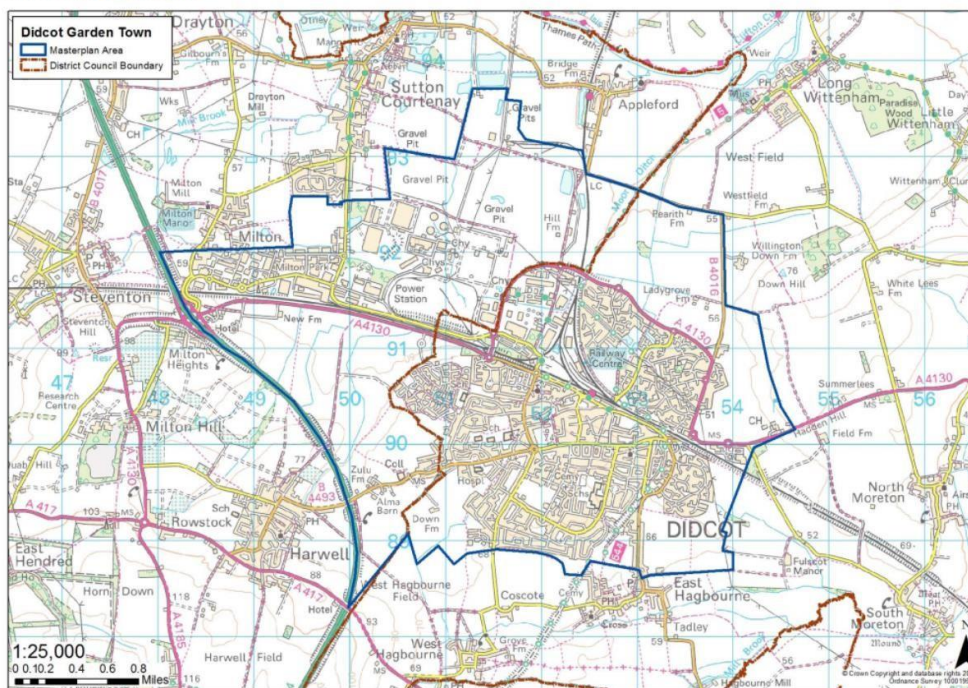
Didcot Garden Town Boundaries



Equally, Core Policy 16b: of the Adopted VOWH Local Plan: Didcot Garden Town, sets out:

Proposals for development within the Didcot Garden Town Masterplan Area, as defined on the Adopted Policies Map and shown by Figure 2.8, will be expected to demonstrate how they positively contribute to the achievement of the Didcot Garden Town Masterplan Principles (Figure 2.7)

Figure 2.8: Didcot Garden Town Masterplan area



Within Figure 2.7 of the Local Plan, the Didcot Garden Town Masterplan Principles, it is key to note in Section 2 on Local Character that:

“The Garden Town will establish a confident and unique identity, becoming a destination in itself that is distinctive from surrounding towns and villages whilst respecting and protecting their rural character and setting.”

[our underlining]

It goes on to deal with heritage matters and refers to the area adjacent to the masterplan area:

“Heritage – the Garden Town will conserve and enhance heritage assets, both designated and non-designated, within and adjacent to the development area. This includes the Scheduled Monuments of the settlement sites north of Milton Park and east of Appleford and any archaeological remains and historic landscapes and / or landscape features identified in the Oxfordshire Historic Environment Record, the

Oxfordshire Historic Landscape Character Assessment, other sources and / or through further investigation and assessment.”

Paragraph 2.118 of the Local Plan states:

“The Garden Town Masterplan Area does not form a development boundary for Didcot and will include substantial areas of formal and informal open space and green infrastructure. The important separation between the surrounding villages, including for example Sutton Courtenay, will continue to be protected from development.”

[our underlining]

The detailed assessment provided within this NP, highlights why the separation from neighbouring settlements is important, but it should be noted that the same applies to the designated and non-designated heritage assets through preserving and enhancing their setting. As such, therefore it is clear that our proposed NP policy is in line with the Local Plan policies.

The village of Sutton Courtenay is a historic settlement, which should not be lost or subsumed by Didcot / Milton Park. This is recognised by not only this Delivery Plan, but also in the Local Plan (policy 16b), and the landscape policy as referenced below.

This is also supported by the analysis work undertaken to support the Garden Town Delivery Plan. This work is extensive and comprehensive in examining the relationship between the proposed expansion and the existing settlement. It is key that this evidence is considered with regard to the proposed NP policy. Pages 302 and 303 (Chapter 8), show the key constraints and add in regard to Neighbouring Villages:

“Didcot is surrounded by a necklace of villages rich in both history and character. The masterplan aims to maintain the integrity of these places by proposing appropriate ‘green buffers’”

It is also clear from the Didcot Garden Town principles for policy, that these principles were taken through into the Adopted Local Plans. This clearly illustrates that the contents of document are not merely to be overlooked, simply because, as a whole it was not adopted as a Supplementary Planning Document (SPD).

In Chapter 10.4 the Didcot Garden Town area of influence boundary, in which Sutton Courtenay is largely located, although a small area to the south and some land to the east falls within the Garden town masterplan boundary itself (as shown in Appendix 6 to the SODC Local Plan above) is described:

“...The boundary follows parish boundaries where possible because these are long established and widely understood, but it has been necessary to deviate from these in

order to capture specific sites or villages which are considered to influence, or be influenced by, the garden town.

The detailed explanation of the boundary, starting at the south and working clockwise, is as follows:

...The boundary again deviates from Milton parish to include the village of Steventon for which Didcot acts as the service centre. To the north of Steventon, the boundary cuts back east to again trace the parish boundaries of Milton, Sutton Courtenay and Culham. Incidentally, the boundary also follows the River Thames at the north which forms a natural geographical boundary.”

It highlights that the area of influence and masterplan areas have been carefully considered and were subject to public consultation between 2016 and 2017.

The contents of the plan can be found below:

<https://www.southoxon.gov.uk/south-oxfordshire-district-council/business-and-economy/garden-communities/didcot-garden-town/didcot-garden-town-delivery-plan/>

This NP policy has been designed to work alongside the Local Plan policy in defining an area which provides an area to create an essential visual and physical gap between areas of development, in line with the Local Plan.

- the extent to which the overall effect of the proposed Green Gaps is a de facto Green Belt;

A Green Belt would imply a more strategic approach than is proposed here, as this is locally specific and as identified in the Local Plan (as above).

The Green Gaps are specifically designed around retaining the individual character of Sutton Courtenay as a separate settlement rather than the prevention of urban sprawl or development.

It is considered that the Neighbourhood Plan is the most appropriate place in which to examine the landscape and setting of the settlement area. As can be seen from the original Garden Town Masterplan, which can be seen in detail on pages 340 -341 (Chapter 9) or below, the proposed green gaps, have taken the masterplan proposals as a starting point, and examined the local context in more detail, thereby proposing a slightly different (smaller) area of green gap than that considered in the masterplan.

This approach is compliant with Local Plan policy and is a ‘Local Gap’ in nature, as it does not seek to extend outside of the Plan Area or make any other reference to ‘gaps’ elsewhere.



Land use

	Didcot Station
	Community centres and retail
	Residential areas (existing)
	Residential areas (consented, or with resolution to grant)
	Residential areas (proposed)
	Employment (existing)
	Employment (proposed)
	Science Vale and Didcot Growth Accelerator enterprise zone sites
	Education
	Healthcare
	Recreation and leisure
	Science Vale sites
	Major car parks

Landscape

Refer also to landscape plan for further detail in chapter 8.2.3

	Park, formal garden, play, amenity and cemetery
	Publicly accessible natural green space
	Allotments, community garden, and city farm
	Proposed green buffer around necklace of villages
	Orchard
	Water/ wetland
	Woodland
	Green corridor
	Garden Line

- the extent to which the approach taken is in general conformity to the strategic policies in the development plan;
As set out above, it is considered to be in conformity with the strategic policies of both Adopted Local Plans, and in particular Policy 16b of the VoWH Local Plan: Delivery of the Didcot Garden Town

In addition, the landscape policy is of particular relevance, and the following extract from the Adopted Local Plan is pertinent to Sutton Courtenay and the application of NP policies:

“Core Policy 44: Landscape

The key features that contribute to the nature and quality of the Vale of White Horse District’s landscape will be protected from harmful development and where possible enhanced, in particular:

- ii. important landscape settings of settlements...***
- iv. areas or features of cultural and historic value***
- v. important views and visually sensitive skylines, and***
- vi. tranquillity and the need to protect against intrusion from light pollution, noise, and motion.***

Proposals will need to demonstrate how they have responded to the above aspects of landscape character and will be expected to:

- vii. incorporate appropriate landscape proposals that reflect the character of the area through appropriate design and management;***
- viii. preserve and promote local distinctiveness and diversity and, where practical, enhance damaged landscape areas.”***

It is considered from the evidence presented in the NP and the Local Plan policies, in addition to the Didcot Garden Town Delivery Plan that there is a substantive need to protect the landscape setting of Sutton Courtenay.

This is also clear from previous Local Plans such as the Local Plan 2011 Policy NE9 – Lowland Vale (identifies areas of damaged landscape including all of the sand and gravel excavation land on the eastern side of Sutton Courtenay between the Village and Appleford) and Policy NE11 – Areas for landscape enhancement (policy aimed at encouraging the repair, restoration, and enhancement of this damaged landscape).

The area is extremely distinctive, with a significant number of heritage assets including numerous Grade II* and Grade I buildings, which far exceed the number that one would expect in such a small area.

Work has been undertaken to highlight important views and to look at tranquillity mapping in the area, and again, the gap between Didcot and Sutton Courtenay needs to allow for a meaningful break to ensure there is no severe harm from pollution sources.

It is considered that the proposed NP policies represent an appropriate landscape response including to enhance the damaged landscape areas as a result of minerals and waste working.

- the extent to which the approach taken is strategic (rather than parish-based) in nature. The Plan proposes a locally based approach, which only affects the Plan area. A large area of the Parish has been removed from the coverage of NP as this is covered by a Local Development Order (Milton Park) as well as the power station site, in addition to land covered by areas of mineral and waste operations. The Plan therefore recognises this remit and includes policies which are restricted to those appropriate areas of land qualifying for locally specific policies.

There are several overlaps between the proposed Green Gaps and the proposed Local Green Spaces (as identified in Policy SC5). Please can the Parish Council expand on how it addressed this overlap in the preparation of the Plan. In addition, how would it anticipate that the District Council would implement the policy in the areas with both designations when the effects of the two policies are different?

These are two separate designations, and whilst the LGS designation effectively limits development to that akin to a Green Belt policy, this does not preclude all development. In such cases, any proposed development would also need to accord with the Green Gaps policy and not affect the integrity of the gap and the physical and visual separation of settlements or the distinctive nature of settlement character.

For example, if the land designated LGS2, were to come forward for an outdoor recreational use, this would be appropriate under the LGS designation. However tall structures or elements which could undermine the gap between settlements would not be permissible.

In this regard, it is seen that the policies could operate effectively alongside each other.

It should also be noted that the proposed gaps follow the settlement areas as established and not parish boundaries. They also follow field patterns and more identifiable and defensible hedgerow and field boundaries rather than arbitrary lines on a plan. Each has been considered to represent a logical placement in the context.

Whilst the various proposed Green Gaps and the Local Green Spaces are shown in their individual background documents and on Figures 6.3 and 6.11 the overlaps are difficult to interpret given the lack of clarity of some of the maps and the different scales of the two figures. I can see that the map on page 39 of the Countryside and Green Gap Assessment attempts to address this position. However, its scale and lack of detail do not have the clarity required by the NPPF for a development plan document. Please can the Parish Council produce a plan (of A3 size) to show these overlaps. If necessary, I am happy for the District Council to help on this matter.

See attached 'Appendix 1: Sutton Courtenay NP LGS and Gaps Plan'

Policy SC5

In general terms this is a good policy which is underpinned by Local Green Spaces Assessment. The final part of this note provides an opportunity for the Parish Council to respond to the representations which have commented on the proposed designations.

Policy SC8

In general terms, this is a good policy which has been designed to be applied proportionately. To what extent does the Parish Council consider that the various criteria are necessary given the way in which they overlap with the contents of the Joint Design Guide?

The Joint Design Guide is not locally specific, whereas the Sutton Courtenay Design Code is much more detailed, following a detailed contextual analysis.

If the wording of the policy is to be altered, the aim is that it is sufficiently robust and requires that proposals are in accordance with the Sutton Courtenay Design Code, which was prepared having acknowledged the content of the Joint Design Guide.

The Parish is concerned that they have had numerous developments in recent years which are generic and poor quality. These do not reflect the local vernacular nor are they based in an understanding of the local context, but merely on standard developer house types and layouts.

It is key to note that this development has been permitted with the previous Design Guide and now the Joint Design Guide in place.

Policy SC9

I understand the purpose of the policy. However, is it in general conformity with the contents of Core Policy 4 of the adopted Local Plan?

If it is in general conformity, should it be applied proportionately (as is the case with Policy SC8) to avoid placing an onerous burden on the development of smaller schemes (such as the development of a single dwelling on an infill plot)?

The aim of this policy is generally for where it relates to schemes of 5+ new dwellings and this could be clarified.

Notwithstanding the above, the Parish is also concerned regarding the incremental loss of smaller dwellings. Many are being lost to large replacement dwelling scheme or cumulative infill developments, where the original small dwelling is demolished for a number of much larger properties.

Policy SC10

This is an excellent policy which is underpinned by the Character Assessment and Design Code. In the round it is a first-class local response to Section 12 of the NPPF.

However, should it be applied proportionately (as is the case with Policy SC8) to avoid placing an onerous burden on the development of domestic or other minor schemes?

The aim is for high quality for all types of development, but where it relates to smaller proposals it should be applied proportionally, but still maintain these standards.

Policy SC11

Is the first part of the policy necessary given that it describes a development management/monitoring matter rather than a land use policy?

In the second part of the policy what would be defined as 'quiet' recreation? Might this matter be better addressed as a criterion in the policy or in the supporting text?

Is the policy intended to apply generally throughout the neighbourhood area or more particularly to the Bridge Farm Quarry (as described in paragraph 9.2.33)?

This policy generally applies to land to the east of Sutton Courtenay but could be applicable to any land which has been used for waste or minerals operations. The first part of the text could be considered as supporting text.

The objective of quiet recreation is for non-motorised and low noise level activities, which could be a criterion of the policy.

Policy SC12

Is the final part of the policy supporting text (describing the process to be followed) rather than a land use policy?

The latter part of the text could be considered as supporting text.

Policy SC13

In the round this is a good policy. I saw the importance of the identified community facilities during the visit.

I am minded to recommend that the order of the two parts of the policy is reversed to provide clarity about its effect. Does the Parish Council have any comments on this proposition?

The reversal of the policy would not affect the objectives and the Parish Council would support this.

Policy SC14

In general terms this is a good policy

However how would 'a significant improvement' be defined? Is this element of the policy necessary given that the associated works would naturally result in a significant improvement of the facilities provided?

Does the second bullet point of the second part of the policy conflict with the criteria included in Policy SC13?

The aim of this policy is to secure a replacement of a better standard than the current facility.

There is potential that the hall could be relocated elsewhere and be of a smaller scale than currently exists and offer less floorspace and amenity benefits.

Equally, the original hall was built in the 1960s, when the village was considerably smaller. The current facilities is now no longer appropriate for the needs of the current population, which is again set to increase with the future housing allocation

The Parish Council does not consider that the second bullet point of the second part of policy SC14 conflicts with the criteria included in Policy SC13. A key objective of the NP is to seek to ensure the provision of social amenities meets the demands of a growing village. Should the village hall amenity be relocated, the site on which it is currently located is in parish council ownership and has the potential to be repurposed for the benefits of the growing village. The site currently also includes historic allotments, tennis court and a scout hut and storage facility.

Question for the District Council

Is the preparation of the emerging Joint Local Plan still proceeding to the timetable as described in the Local Development Scheme?

The Council has approved [an updated Local Development Scheme](#) in September 2023. A timetable for the Joint Local Plan can be found on page 10 and 11 of the document.

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan?

With regard to the Green Gaps, many of the responses question the landscape assessment and the evidence base in this regard. Rather than respond individually, the Parish Council is content that the work undertaken has been prepared by landscape professionals. Where this is contrary to the information contained within the responses below, this is considered to be a matter of professional difference and ultimately the Parish considers that work undertaken is based on a comprehensive analysis of the Plan Area.

The aim of the Green Gap policy SC1 is in part to determine where the visual boundaries are to enable the appropriate separation of settlements.

Where the responses relate to individual potential housing allocation sites, the NP does not seek to comment on the appropriateness of these sites nor allocate further housing.

It is considered that the Plan Area will continue to substantially contribute to the housing numbers for the District, both within the current Local Plan policy remit, and in addition to current Local Plan allocation for approx. 220 homes.

The Plan Area has been subject to approx. 350+ new homes (this has increased since NP was written and submitted) in the last ten years. To allocate further development would be risking the successful integration of those new properties and the potential loss of character, which has already been eroded by low quality new housing, which does not reference the local character of the area.

The Plan has been prepared in relation to the community responses in surveys, in person consultation events etc, as set out in the Consultation Statement. At every stage, the community have confirmed that further strategic scale development over and above that already proposed would not be supported. This however does not mean that the Plan is not positively prepared, as the policies support those of the Adopted Local Plan which allow for development and propose the strategic site.

I would find it helpful if the Parish Council commented on the representations from:

Mark Doodes Planning (Responses 5 and 7);

In addition to the above, the sites in question are considered necessary to prevent linear sprawl to the west and a resulting coalescence with Drayton. There are few gaps remaining between the two settlements and should be protected as per the reasons set out above.

The Plan proposes a comprehensive approach to Gaps as discussed above and to omit one for flood reasons would not be appropriate or consistent.

Cauldwell and Sons (response 8);

In addition to the above, it should be noted that the Steering Group amended the boundary of the LGS following the Pre-Submission consultation comments from VoWHDC.

Although the recommendation was to discuss the designation with the landowner in more detail, it was latterly considered, that as a fishing lake site, LGS designation would not conflict with the designation as it would still allow for outdoor recreation related development which would be compatible with the current use.

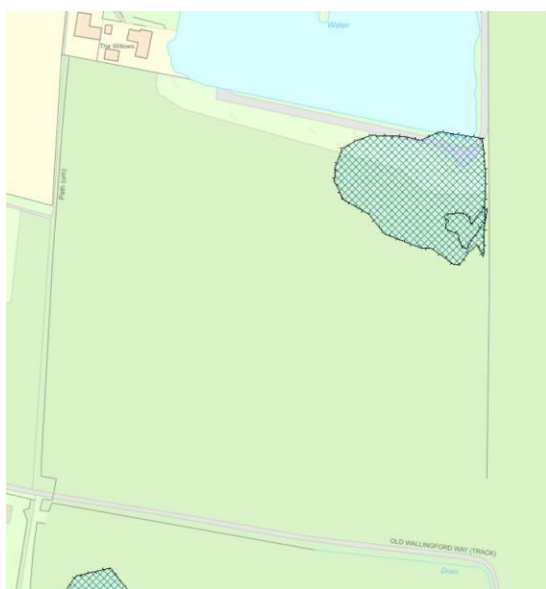
With regard to the clarity of the criteria and methodology for assessment, a higher resolution copy of the LGS matrix is attached as 'Appendix 2: Sutton Courtenay NP LGS Matrix.'

Victoria Land (Responses 9 and 10);

In addition to the above, and notwithstanding the highlighted plans below, it is visibly clear in these instances that there is a distinction between the agricultural fields and garden land in this location, such that the residential area can clearly be demarcated on more detailed plans.

With reference to any flooding issues, the Plans are produced from the Parish Online GIS system which references GIS data from numerous sources, including the Environment Agency flood maps. These are regularly updated and the content is essentially up to date. Therefore, the plan provided at the time of writing, may subsequently be updated over time. This can be revised as necessary.

Nevertheless, it should be noted that such flood maps are not always accurate and local evidence is often more up to date. In this regard, photos of flood events have been provided in the evidence base and reproduced below.



Cross Trees Farm – historic flood outline (current EA maps)



Cross Trees Farm Looking towards Cross Trees Farm over the field to its east, February 2020



Cross Trees Farm – Current aerial image overlaid onto OS base from Parish Online highlight the nature of the site as open countryside and not residential or garden land.



Long Barn - It is visibly clear that there is a distinction between the agricultural fields and garden land in this location.

Roebuck Land (Response 15);

In addition to the general responses above:

LG2 Site response – it is considered that the proposed designation does not conflict with or cover the highway. Irrespective of this, one exception to a Local Green Space designation, is the ability for the Highway Authority to carry out infrastructure and highway improvements as necessary. This designation would not prevent this.

With regard to flooding, the Plans are produced from the Parish Online GIS system which references GIS data from the Environment Agency flood maps. These are regularly updated, and the content is essentially up to date. Therefore, the plan provided at the time of writing, may subsequently be updated over time. This can be revised as necessary.

The location of the Green Gap reflects the Local Plan need for a landscaping scheme alongside the eastern boundary of the site, where the hedgerow and brook exist. This policy merely reaffirms the Local Plan Allocation which requires:

- An appropriate settlement edge should be incorporated into the design of the eastern boundary.
- Retain and enhance existing vegetation to boundaries.
- Create a new landscape structure, building on existing landscape features.
- Integrate existing hedges.
- Contribute towards redressing the identified partial Green Infrastructure deficit in Sutton Courtenay

and reflects application proposals submitted at the time of writing – see below for proposed land use plan as submitted for P21/V2682/O.



The NP does not contradict the Local Plan, nor does it indicate that the site should not be allocated, as suggested.

Oxfordshire County Council (Response 16);

Where there are any outstanding errors or factual inaccuracies which have occurred due to the passage of time, the Parish is happy for these to be addressed.

The Parish would be keen for a heritage policy to be inserted as suggested.

With regards Minerals and Waste, most comments relate to updating old information which we accept. However, one comment is to delete paragraph 2.3.4. If we do that, we lose the map in the Figure labelled Figure 2.2: Inset Map: Sutton Courtenay, Oxfordshire Minerals and Waste Local Plan, 1996. As this figure seems to be the only map of the waste site that shows the land is meant to be restored to agricultural land, we would like to retain it but clarify that the 1996 Strategy is out of date.

Bloor Homes (Response 17);

In addition to the general responses above:

The Plan was subject to numerous phases of consultation, including in-person consultation events (September 2022) to then update the 2018 survey, which was open to all as set out in the Consultation Statement. It is disputed that consultation has been insufficient. The respondent fails to note that the NP was prepared during COVID restrictions and has endeavoured to engage as meaningfully as possible in the circumstances.

As soon as in person events were encouraged, this form of consultation was resumed. This was open to all and advertised for anyone to attend and not just limited to residents.

No stages have been skipped in the process, and this is seen as an attempt to undermine the community responses to the preparation of this plan.

The Parish Council is confused at the statement that the Regulation 14 Plan is no different to that of the Regulation 16 plan. The Consultation statement clearly sets out the representations and changes made as a result.

As above, this plan does not comment on whether or not the housing site put forward would be suitable, this is for the LPA, who have previously refused applications on this site.

MEPC (Response 18);

It should be noted, as stated previously that the LDO area has been excluded after discussions with the District Council and not as a Steering Group decision. The boundary has been drawn at the request of the LPA.

MEPC have not been excluded from any consultation and have engaged throughout the process as per the consultation statement. As the LPA requested that the site not be included within the Plan Area and for the Plan not to include any policies which would affect the Milton Park site.

The boundary for the LGS has been amended following previous comments at Pre-Submission Stage as shown from the extract below:



Figure 6.11 Plan of Local Green Spaces proposed for designation

FCC Environment (Response 19).

As per OCC amendments and previous general points

The District Council proposes a series of revisions to certain policies and the supporting text in the Plan. Does the Parish Council have any comments on the suggested revisions?

It would appear that some of the responses repeat that of the Pre-Submission comments and does not revisit those changes made as a result.

With particular regard to the District Council's comment #2 with reference to our Green Gap Policy SC1 (Page 36 of the document) maps were updated where required and slight amendments to text were made to reflect the NP area following the Vale's comments under the Reg 14 consultation.

We believe we have modified parcel A4a to remove the area within the LDO. If it can be demonstrated that this requires further amendment this can be done.

With regard to Green Gaps, in addition to the general comments already made above, we note that the District Council is concerned that many of the proposed gaps are too large. Furthermore, the District Council considers that only parcels A4a and A3j are appropriate to identify as Green Gaps 'as these are single fields separating the built-up edge of Sutton Courtenay from neighbouring Milton and the industrial estate'.

In its suggested alternative policy wording the District Council states that a 'physical and visual separation' should be maintained that this is 'not unacceptably diminished' and that individually or cumulatively development proposals should 'not compromise the physical and visual separation between settlements'.

We would agree that these two parcels do indeed represent the only remaining physical gaps between Sutton Courtenay and the 'Milton Park Industrial Estate', and between Sutton Courtenay and Milton Village. However, although these areas provide a physical separation between settlements, the visual separation has already been compromised, in particular by the recent construction of a large warehouse - sited on land to the northwest of the Didcot A site and by the new housing developments along Sutton Road in Milton Village.

In order to ensure that this is not repeated with respect to other parts of the settlement boundary, the Parish Council engaged landscape professionals to provide expert guidance in determining where the visual boundaries lie so as to enable the appropriate separation of settlements. We consider that the proposed Green Gaps are the minimum required to achieve the objective of ***both*** physical and visual separation.

We accept the District Council's comment on Key Views that 2, 9, 10 and 15 are missing from Fig 6.7. Please find attached 'Appendix 3: Key View location maps REVA' which contains an updated Figure 6.7 as well as three inset maps should the Examiner wish to have a detailed view of where those views overlap and are difficult to see.

Additional Comment from Sutton Courtenay Parish Council

We also noted that the view triangles for Key Views 1, 5, 8, 18 and 20 do marginally stray over land outside the NP boundary. The section for each view arrow that falls outside the area (in all cases) is very small. If required, we will adjust.

However, the origin point for Key View 5 falls within our boundary.

Protocol for responses

I would be grateful for responses and the information requested by 6 September 2023. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I would be happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please could it come to me directly from the District Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner



Sutton Courtenay Neighbourhood Development Plan

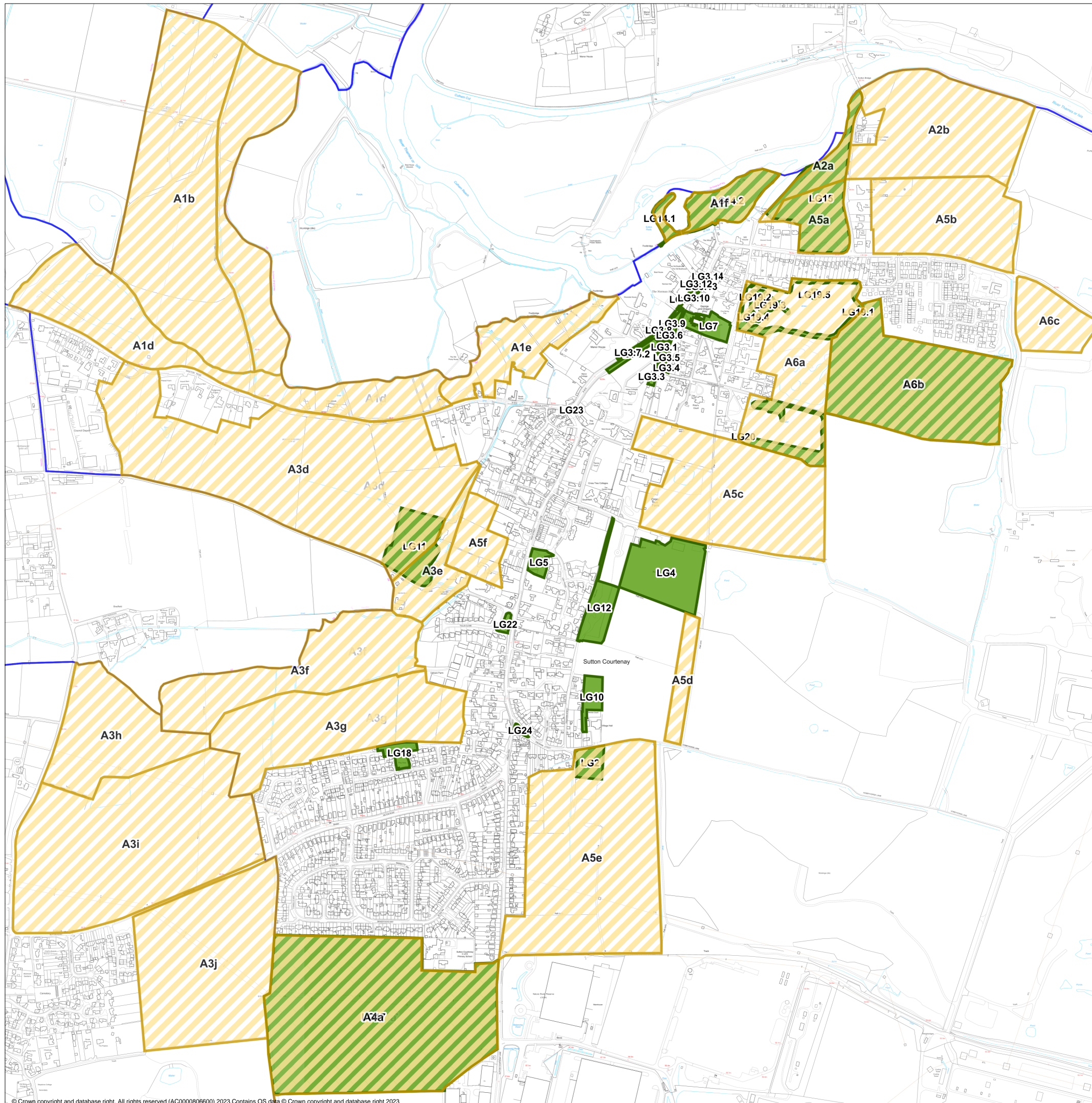
14 August 2023

Appendix 1: Sutton Courtenay NP Local Green Space and Gaps Plan

Sutton Courtenay Neighbourhood Plan -

Map of Green Gaps and Local Green Space Designations

-  Green Gap Designation
-  Green Gap and Local Green Space Designation
-  Local Green Space Designation



Appendix 2: Sutton Courtenay NP Local Green Space Matrix

Sutton Courtenay Neighbourhood Plan Local Green Spaces Assessment

	Name of site (as popularly known)	NPPF 1 - Close proximity to community (yes/no)	NPPF 2 - Demonstrably special to a local community					Total (out of 23)	NPPF 3 - Extensive Tract of land? (yes/no) size	Ownership - Owner aware? (yes/no)	Is this site allocated for any other use (yes/no)	Public access (yes/no)	Total out of 27	%	Recommendation	Comments
			Beauty/ Amenity value score	Recreation score	Historical score	Tranquillity score	Wildlife score									
LG-1	The Millennium Common, off Church Mill Road	Y	4	4	2	3	3	16	N	Y	N	Y	20	74%	Designate	
LG-2	Site of former Catholic church, Hobbyhorse Lane	Y	4	1	1	4	2	12	N	Y	N	N	15	56%	Designate	Scores highly in beauty and amenity value / tranquillity and wildlife
LG-3	The Green, Church Street	Y	5	3	4	3	2	17	N	Y	N	Y	21	78%	Designate	
LG-4	Old Wallingford Way Recreation Ground	Y	3	5	2	4	1	15	N	Y	N	Y	19	70%	Designate	
LG-5	Green space, Lady Place and High Street	Y	4	4	3	3	1	15	N	Y	N	Y	19	70%	Designate	
LG-6	Communal garden for residents of Lady Place	Y	4	1	3	4	2	14	N	Y	N	N	17	63%		Private communal garden space and conditions on permission prevent redevelopment as use is for amenity in connection with the properties
LG-7	All Saints' Churchyard, The Green	Y	4	2	5	4	3	18	N	Y	N	Y	22	81%	Designate	
LG-8	The Cemetery, Old Wallingford Way	Y	4	2	2	3	1	12	N	Y	N	Y	16	59%	Designate	Unless any associated buildings are required?
LG-9	Sutton Courtenay Village Hall tennis court, Hobbyhorse Lane	Y	1	4	1	3	0	9	N	Y	N	Y	13	48%		Covered by alternative designation or adequate means of protection - Recreation facility
LG-10	Allotments	Y	3	1	2	4	2	12	N	Y	N	N	15	56%	Designate	Just over threshold, but sufficient to designate given use
LG-11	Mill Lane	Y	4	3	2	5	2	16	N	Y	N	Y	20	74%	Designate	
LG-12	Land south of cemetery	Y	4	3	2	4	2	15	N	Y	N	Y	19	70%	Designate	
LG-13	Harwell Rd/ hobbyhorse Lane	Y	2	2	1	3	1	9	Y	Y	N	Y	12	44%		Score is significantly lower than threshold with it also being an extensive tract of agricultural land

Scoring Criteria:

Beauty

Score	Required Attributes
1	Limited visual attractiveness, limited variety of natural features, provides a limited contribution to the setting of the local area.
2	Good visual attractiveness, limited variety of natural features but of a good quality, provides a good contribution to the setting of the local area.
3	Good visual attractiveness, variety of natural features of a good quality, provides a good contribution to the setting of the local area.
4	Very good visual attractiveness, good variety of natural features and of a good quality, provides a very good contribution to the setting of the local area.
5	Excellent visual attractiveness, excellent variety of natural features and of good quality, provides an excellent contribution to the setting of the local area.

Historic

Score	Required Attributes
0	The site meets none of the sub-criteria
1	The site meets one of the sub-criteria
2	The site meets two of the sub-criteria
3	The site meets three of the sub-criteria
4	The site meets four of the sub-criteria
5	The site meets all of the sub-criteria
Sub-criteria	
	Site is located within an area of high archaeological potential .
	Site makes a positive contribution to the setting of a locally listed building .
	Site makes a positive contribution to the setting of a nationally listed building .
	Site makes a positive contribution to the setting of a scheduled ancient monument .
	Site makes a positive contribution to the setting of a conservation area .

Recreation

Score	Required Attributes
0	Site has no public access and is therefore considered to have no/very limited recreational value.
1	Site is accessible to the public if an entrance fee is paid/or site is privately accessible to a limited group of people.
2	Public access but no evidence submitted of informal or formal use, no notable recreation facilities, and no information provided/evidence of frequent use .
3	Public access, evidence of good range of informal uses , some limited facilities and/or information provided on/evidence of reasonably frequent use .
4	Public access, evidence of good range of informal and formal uses, good facilities (fair condition and range) and/or information on/evidence of frequent use .
5	Public access, evidence of a good range of informal and formal uses, excellent facilities (good/excellent condition and range) and information on/evidence of frequent use .
Additional weight to be added if no other similar spaces are within 800m (10 mins) of the space being assessed to ensure that spaces which are more isolated but provide recreational value are recognised for their importance.	

Tranquillity

Score	Required Attributes
1	Major and constant disturbance. The site is heavily affected by a main road/or by neighbouring uses with regular disturbance. Total lack of self-containment and screening.
2	Frequent disturbance. The site has some disturbance by a main and/or multiple roads and/or by neighbouring uses with regular disturbance. Limited self-containment and screening.
3	Some disturbance. The site is located on a major and/or minor road with some neighbouring uses causing disturbance. Limited self-containment and screening. Scale of site may mean there are undisturbed parts.
4	Limited disturbance in at least part of site, e.g. site is located within residential area with low levels of noise and visual intrusion from associated residential or recreational activities. Degree of self-containment and screening limit noise disturbance in site.
5	No notable sources of disturbance. No visual or audible intrusion. High degree of self-contain limit noise and disturbance.

Wildlife

Score	Required Attributes
1	None or limited evidence submitted in relation to wildlife observed on the site, and the open space is not in, or in close proximity to any designated area of ecological significance. There is however an assumed level of wildlife value to the site (habits or species).
2	Good evidence submitted in relation to wildlife observed on site but open space is not in or close proximity to any designated area of ecological significance.
3	Good level of evidence submitted in relation to wildlife on site, and open space is located in close proximity to, or is designated as, an area of local ecological importance of Local Nature Reserve.

	Name of site (as popularly known)	NPPF 1 - Close proximity to community (yes/no)	NPPF 2 - Demonstrably special to a local community					Total (out of 23)	NPPF 3 - Extensive Tract of land? (yes/no) size	Ownership - Owner aware? (yes/no)	Is this site allocated for any other use (yes/no)	Public access (yes/no)	Total out of 27	%	Recommendation	Comments
			Beauty/ Amenity value score	Recreation score	Historical score	Tranquillity score	Wildlife score									
LG-14	Sutton Pools	Y	5	3	4	5	3	20	N	Y	N	Y	24	89%	Designate	
LG-15	Riverside Meadow	Y	3	3	2	4	2	14	N	Y	N	Y	18	67%	Designate	
LG-16	Field bordered by Cross Trees Farm to east of High St	Y	3	0	4	4	1	12	N	Y	Y	N	14	52%		Planning permission granted
LG-17	Kelaarts Field	Y	3	3	3	3	3	15	N	Y	N	Y	19	70%	Designate	
LG-18	Asquith Park LEAP	Y	2	4	1	3	2	12	N	Y	N	Y	16	59%	Designate	Recommend designate with the reed bed area
LG-19	Land to the west of the Millenium Common	Y	4	1	3	4	2	14	N	Y	N	Y	18	67%	Designate	Important setting to the Conservation Area. Current permissive access welcomed. Would recommend talks with Club to ascertain future options to agree final boundary
LG-20	Land to the south-west of the Millenium Common	Y	3	1	2	4	2	12	N	Y	N	Y	16	59%	Designate	Important to the setting of the Conservation Area
LG-21	Tyrrell's Way green space	Y	3	2	1	4	1	11	N	Y	N	Y	15	56%		A small space unlikely to be developed due to outlook of buildings
LG-22	Green space bordered by High St, Mill Lane and Tullis Close	Y	3	2	3	4	1	13	N	Y	N	Y	17	63%	Designate	
LG-23	Triangle at junction of Brook St, Church St and High St	Y	2	2	4	2	1	11	N	Y	N	Y	15	56%	Designate	
LG-24	Triangle at junction of Frilsham St and High St	Y	3	2	2	3	2	12	N	Y	N	Y	16	59%	Designate	
LG-25	Land at The Norman Hall	Y	5	0	4	2	1	12	N	Y	Y	N	14	52%		No public access or visibility - Covered by alternative designation or adequate means of protection - Conservation Area (inc trees) although individual TPOs could be considered. Also setting of Grade I Listed building
LG-26	Land at The Abbey	Y	5	0	4	2	2	13	N	Y	N	N	16	59%		No public access - Covered by alternative designation or adequate means of protection - Conservation Area (inc trees) although individual TPOs could be considered. Also setting of Grade II* Listed building
LG-27	Land at Priors Court	Y	4	0	2	5	1	12	N	Y	Y	N	14	52%		No public access - lawful use as garden

The scoring system is the number of accumulated points in the NPPF 2 section, plus 1 point for each relevant yes/ no questions in NPPF1 and NPPF3, plus whether it is allocated for any other use and whether it has public access. The only question that does not receive points is whether the owner is aware. Therefore a site can gain an additional 4 points further to the scoring given in the NPPF2 questions.

In designating an area as Local Green Space it is proposed that if an area achieves over 60% of the points available, then it would be considered automatically for designation. If it scores over 50% and highly against at least three criteria, it should also be designated.

Alternatively, if an area scores over 45% and highly against at least one criteria, it will also be considered for designation due to its specific value.

If an area scores below 45% then it will not be considered for designation unless it can be combined with an adjacent, highly scoring site.

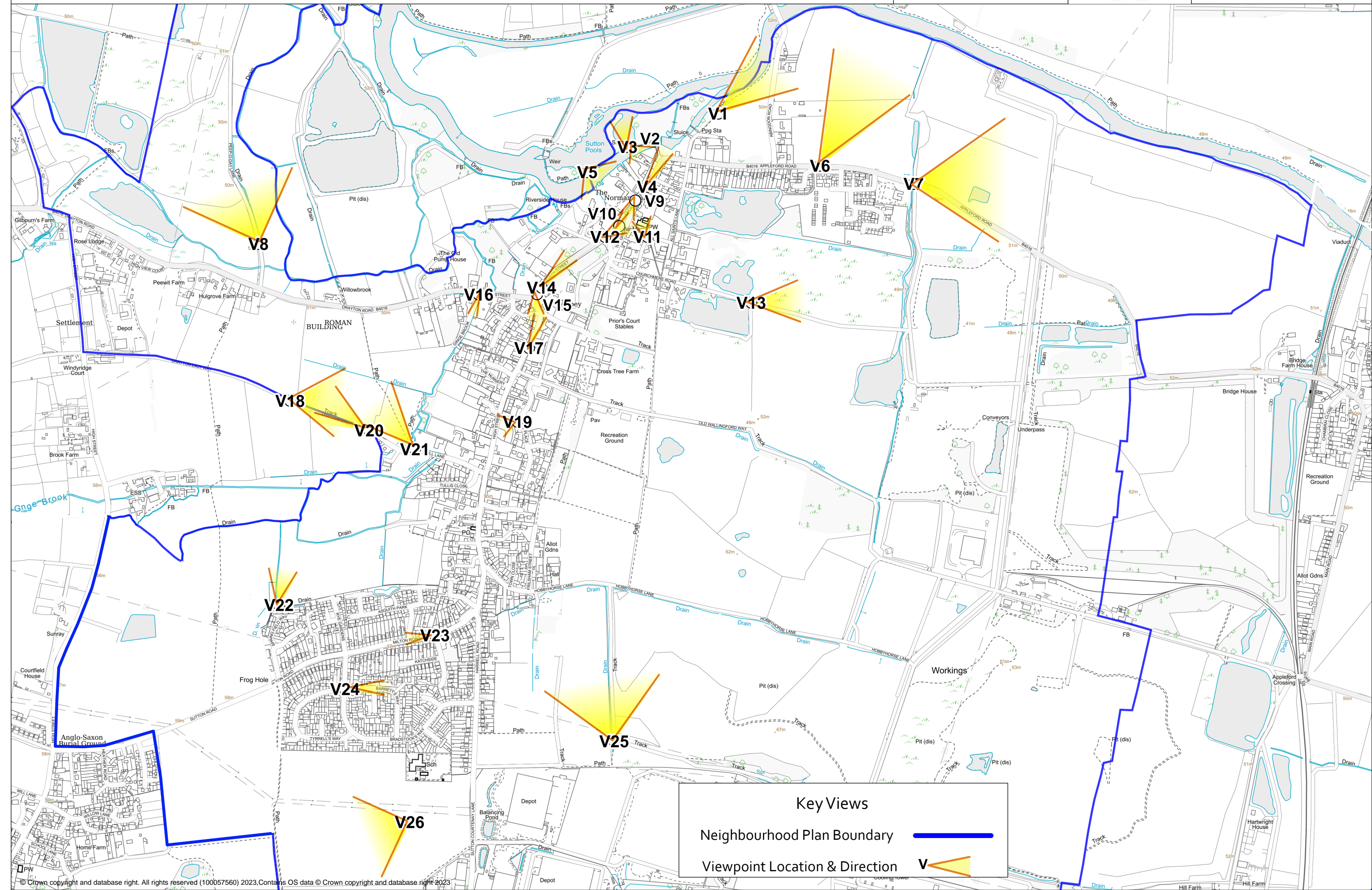
Where an area has been allocated for another use, it cannot be designated as a LGS.

In the comments section where is discusses the potential for applying for a Tree Preservation Order on a site, it should be noted that each application is assessed individually. Orders should be used to protect selected trees and woodlands if their removal would have a significant negative impact on the local environment and its enjoyment by the public. Each tree is assessed for a range of characteristics including:


- size and form;
- future potential as an amenity;
- rarity, cultural or historic value;
- contribution to, and relationship with, the landscape; and
- contribution to the character or appearance of a conservation area


Recommendation in this document does not mean that trees would warrant further protection, without assessment by a qualified arboriculturalist.

Appendix 3: Key Views location maps REVA





Key Views

Neighbourhood Plan Boundary 

Viewpoint Location & Direction 

Key Views - Inset 1

Neighbourhood Plan Boundary 

Viewpoint Location & Direction 

V5

V3

V2

V4

Suices

The Wharf

Wharf Barn

LB

The Fish (PH)

The Barn

Boat House

Coniston

50.8m

SR

Def

SR

Def

FB

FB

FB

FB

43

41

35

31

25

23


26


20

12

14

Key Views - Inset 2

Neighbourhood Plan Boundary 

Viewpoint Location & Direction 

V9

51.4m
+

George
(PH)

V10 War
Meml

Path (um)

Path (um)

50.7m

V12

The
Green

V11

House

Key Views - Inset 3

Neighbourhood Plan Boundary

Viewpoint Location & Direction

Drain

50.8m

50.4m

V14

V15

The Abbey

The Abbey

BROOK STREET

East Wilden

GP

Barn

The Croft