

# Berrick Salome Neighbourhood Plan - publicity period

## Response 1

### Respondent Details

Information	
<b>Respondent Number:</b> 1	<b>Respondent ID:</b> 115044411
<b>Date Started:</b> 28/04/2019 10:44:15	<b>Date Ended:</b> 28/04/2019 10:52:36
<b>Time Taken:</b> 8 mins, 21 secs	<b>Translation:</b> English
<b>IP Address:</b>	<b>Country:</b> United States

Q1. Are you completing this form as an:
Individual

### Your comments

<p>Q2. You can provide your comments on the Berrick Salome 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. If you wish to provide evidence and any supporting documents to support/justify your comments, there is a facility to upload your documents below. After this stage, the opportunity for further comments will be only at the request of the examiner.</p>
<p>This objection relates to policy BER 1 and the inclusion of part of a field within the settlement boundary at Rokemarsh. See attached file for details. The inclusion of the site within the proposed settlement boundary is not justified in the plan and is contradicted by the methodology used to draw the boundary.</p>

Q3. You can upload supporting evidence below
<ul style="list-style-type: none"><li>File: Objection to policy BER1 by Liam Tiller.pdf</li></ul>

<p>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.</p>
<p>The part of a field detailed in the attached file should be removed from the settlement boundary at Rokemarsh.</p>

### Public examination

<p>Q6. The majority of examinations are expected to be through written representations, however the examiner will decide whether there is a need for a public examination. Please indicate below whether you think there should be a public examination on the Berrick Salome Neighbourhood Plan:</p>
<p>Don't know</p>

### Your details and future contact preferences

## Objection to Policy BER 1 in the submitted Berrick Salome Parish Neighbourhood Plan from Liam Tiller

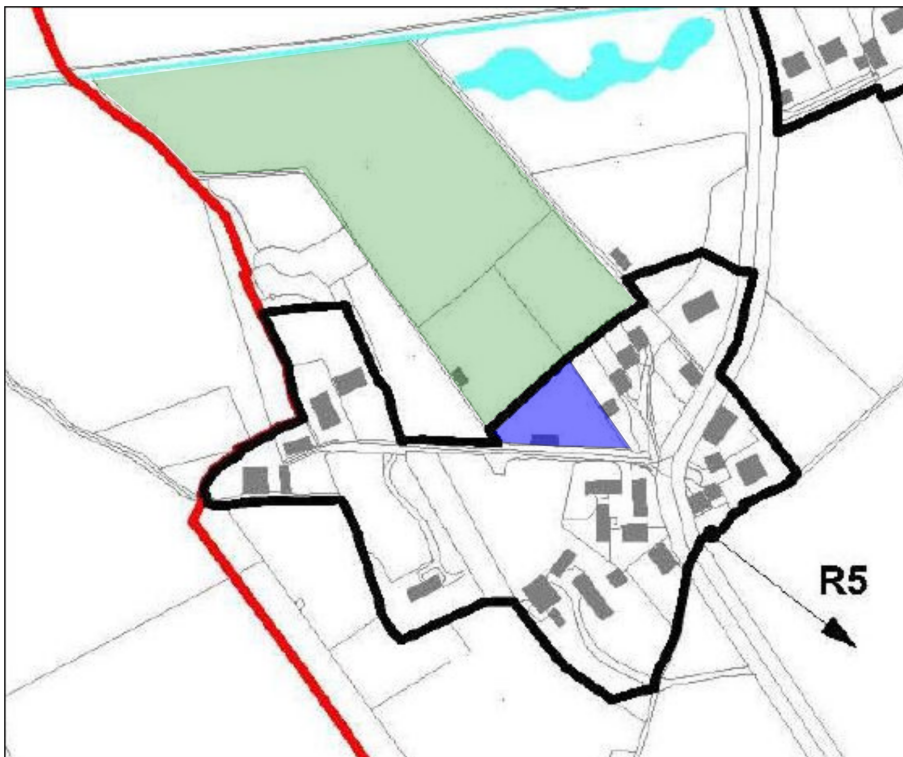
1. This objection relates to policy BER 1 and the inclusion of part of a field within the settlement boundary at Rokemarsh.

### The Site

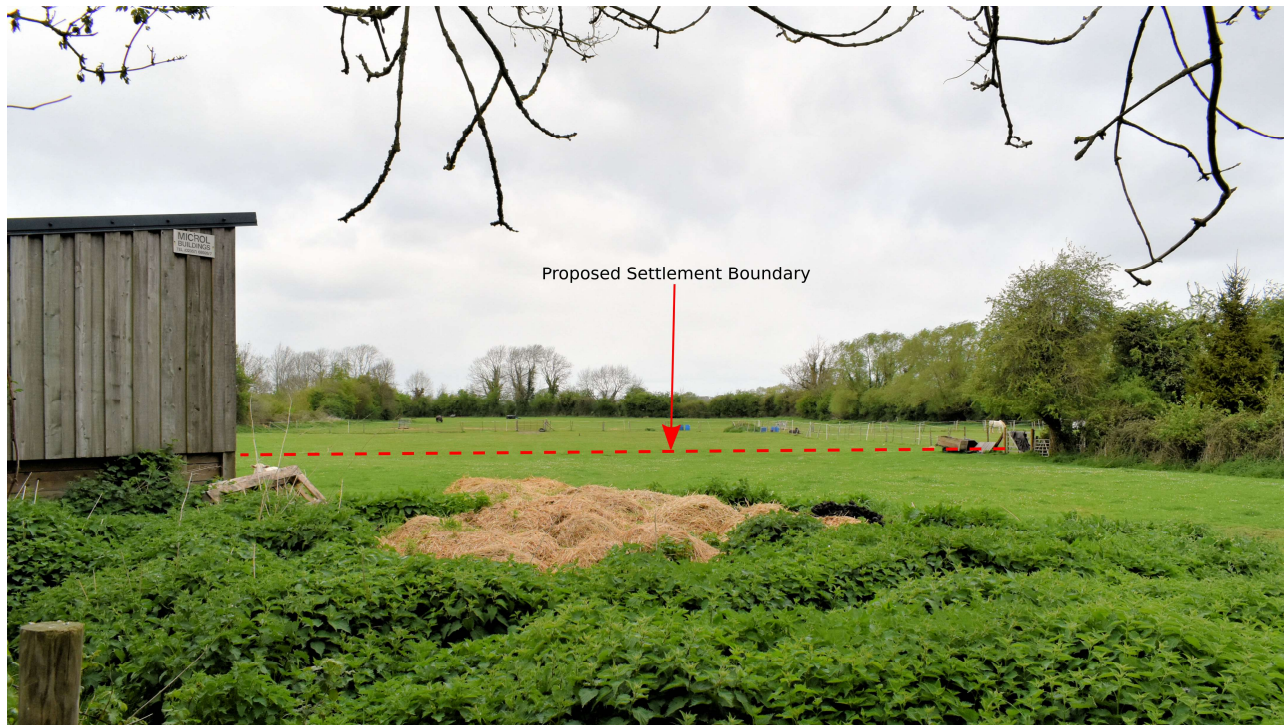
2. The land is to the north of the lane, known as Journey's End Lane, which runs west from Harrow Corner. The land is part of a much larger field used for horse grazing, and contains a stable. The objection site is marked in blue and the rest of the field in green on Plan A (below).

3. Photograph 1 (on the next page) shows the view north from Journey's End Lane with the approximate line of the proposed settlement boundary shown in red. It will be seen that there is no existing boundary where the settlement boundary is proposed.

### PLAN A



Photograph 1



### The Objection

4. The NPPF makes it clear that policy choices in plans need to be justified.<sup>1</sup> The Plan gives no justification for including the objection site within the settlement boundary of Rokemarsh.

5. Paragraph 5.7 of the Plan (page 25) says: '[the settlement boundaries are] ...formed by buildings, which have a clear functional relationship to the settlement'. Paragraph 5.8 says: '[the settlement boundaries] also reflect plot boundaries where they are clearly defined in the street-scene or within the landscape, e.g. mature trees/hedges, boundary walls/fences'.

6. It is obvious that this justification makes no case for including the objection site within the settlement boundary of Rokemarsh, in fact it does the opposite. The boundary of the land in question is not marked on the ground by any boundary. I questioned the inclusion of this land within the settlement boundary with a member of the neighbourhood plan group. He seemed to be under the impression that the map showed that there was a house on the site. In fact the building on the site is a stable. My previous objection is included in the Plan's Consultation Statement on

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<sup>1</sup> [www.gov.uk/guidance/national-planning-policy-framework/3-plan-making](http://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making) (paragraphs 35 and 36).

page 53 of the consultation statement ID 14/12b, Parishioner W. The NP Team Response is 'We've applied the boundary criteria across all settlements consistently'.

7. This reply is not a reasoned justification of why the site, which conflicts with justifications in the plan, is included.

### **Conclusion**

8. In the absence of a sound justification for including the objection site it should be removed from the settlement boundary of Rokemarsh in the Plan.

Liam Tiller  
27 April 2019

Q8. How your personal details will be used Responses to the publicity period will be forwarded to the independent examiner. This will include comments, names and contact details and is required by Part 5, Regulation 17 of the Town and Country Planning (Neighbourhood Planning) Regulations 2012. We have received assurance that the data will be kept securely and not used for any other purpose. The examiner will retain the data until after we decide whether or not to adopt the plan and the deadline for a Judicial Review has passed. This is six weeks after a decision notice has been published. Vale of White Horse District Council will hold the data for up to six years after a decision notice has been published. Representations submitted by individuals will be published on our website alongside their name. No other contact details will be published. Representations submitted by businesses or organisations will be published in full, including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection) (\* denotes mandatory question)

<b>Title</b>	Mr
<b>Name</b>	Liam Tiller
<b>Job title (if relevant)</b>	
<b>Organisation (if relevant)</b>	
<b>Organisation representing (if relevant)</b>	
<b>Address line 1</b>	
<b>Address line 2</b>	
<b>Address line 3</b>	
<b>Postal town</b>	
<b>Postcode</b>	
<b>Telephone number</b>	
<b>Email address</b>	

## Response 2

### Respondent Details

Information	
<b>Respondent Number:</b> 2	<b>Respondent ID:</b> 115603168
<b>Date Started:</b> 03/05/2019 12:15:38	<b>Date Ended:</b> 03/05/2019 12:22:31
<b>Time Taken:</b> 6 mins, 53 secs	<b>Translation:</b> English
<b>IP Address:</b>	<b>Country:</b> United Kingdom

Contact Details
<b>Name</b> Sir/Madam
<b>Email</b> annelankester@nhs.net

Q1. Are you completing this form as an:
Organisation

### Your comments

Q2. You can provide your comments on the Berrick Salome 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. If you wish to provide evidence and any supporting documents to support/justify your comments, there is a facility to upload your documents below. After this stage, the opportunity for further comments will be only at the request of the examiner.

Thank you for asking the Oxfordshire Clinical Commissioning Group (OCCG) to comment on the Berrick Salome Neighbourhood Plan. The OCCG commissions health services for all those registered with an Oxfordshire GP. The OCCG made comments regarding the plan back on the 2nd January 2019. These were sent direct to the Parish Clerk and these remain our current comments and our noted below for reference:

Dear Chris,

Many thanks for asking the Oxfordshire Clinical Commissioning Group (OCCG) to respond under Regulation 14 on your draft NP.

The OCCG commissions health services for all those who are registered with an Oxfordshire GP. The current direction of travel for the OCCG is for Practices to work as Neighbourhoods with around a 30K-50K registered population, this encourages sustainability and more locally commissioned services.

Looking at our records your Parish comes under a couple of these Neighbourhoods, as I would presume some of your residents are either registered with the Mill Stream Practice in Benson or the Watlington/Chalgrove Practice.

I have read your draft NP with much interest and was glad to note the mention of 'promoting healthy lifestyles' to the community by encouraging use of the bridleways and footpaths, therefore, reducing shorter car journeys were possible.

You may find it useful to view the Oxfordshire Joint Strategic Needs Assessment (JSNA) Report found on the OCC website, which provides information about Oxfordshire's population and the factors affecting health, wellbeing, and social care needs.

Please do let me know if you have any queries in relation to our response or if you would like any further information at this stage.

Many thanks, Anne

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.

N/A

## Public examination

Q6. The majority of examinations are expected to be through written representations, however the examiner will decide whether there is a need for a public examination. Please indicate below whether you think there should be a public examination on the Berrick Salome Neighbourhood Plan:

No, I do not request a public examination

## Your details and future contact preferences

Q8. How your personal details will be used Responses to the publicity period will be forwarded to the independent examiner. This will include comments, names and contact details and is required by Part 5, Regulation 17 of the Town and Country Planning (Neighbourhood Planning) Regulations 2012. We have received assurance that the data will be kept securely and not used for any other purpose. The examiner will retain the data until after we decide whether or not to adopt the plan and the deadline for a Judicial Review has passed. This is six weeks after a decision notice has been published. Vale of White Horse District Council will hold the data for up to six years after a decision notice has been published. Representations submitted by individuals will be published on our website alongside their name. No other contact details will be published. Representations submitted by businesses or organisations will be published in full, including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection) (\* denotes mandatory question)

<b>Title</b>	Mrs
<b>Name</b>	Anne Lankester
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## Response 3

### Respondent Details

Information	
<b>Respondent Number:</b> 3	<b>Respondent ID:</b> 118390189
<b>Date Started:</b> 04/06/2019 08:23:06	<b>Date Ended:</b> 04/06/2019 08:32:41
<b>Time Taken:</b> 9 mins, 35 secs	<b>Translation:</b> English
<b>IP Address:</b>	<b>Country:</b> United Kingdom

Q1. Are you completing this form as an:
Organisation

### Your comments

<p>Q2. You can provide your comments on the Berrick Salome 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. If you wish to provide evidence and any supporting documents to support/justify your comments, there is a facility to upload your documents below. After this stage, the opportunity for further comments will be only at the request of the examiner.</p>
<p>Thank you for your consultation on the above dated and received by Natural England on 15th April 2019.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>

### Your details and future contact preferences

Q8. How your personal details will be used Responses to the publicity period will be forwarded to the independent examiner. This will include comments, names and contact details and is required by Part 5, Regulation 17 of the Town and Country Planning (Neighbourhood Planning) Regulations 2012. We have received assurance that the data will be kept securely and not used for any other purpose. The examiner will retain the data until after we decide whether or not to adopt the plan and the deadline for a Judicial Review has passed. This is six weeks after a decision notice has been published. Vale of White Horse District Council will hold the data for up to six years after a decision notice has been published. Representations submitted by individuals will be published on our website alongside their name. No other contact details will be published. Representations submitted by businesses or organisations will be published in full, including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection) (\* denotes mandatory question)

<b>Title</b>	-
<b>Name</b>	Sharon Jenkins
<b>Job title (if relevant)</b>	Technical Support Adviser
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<b>Organisation representing (if relevant)</b>	-
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<b>Address line 3</b>	-
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<b>Telephone number</b>	0300 060 3900
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# Response 4

## Respondent Details

Information	
<b>Respondent Number:</b> 4	<b>Respondent ID:</b> 118391291
<b>Date Started:</b> 04/06/2019 08:37:03	<b>Date Ended:</b> 04/06/2019 08:46:54
<b>Time Taken:</b> 9 mins, 51 secs	<b>Translation:</b> English
<b>IP Address:</b>	<b>Country:</b> United Kingdom

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Berrick Salome 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. If you wish to provide evidence and any supporting documents to support/justify your comments, there is a facility to upload your documents below. After this stage, the opportunity for further comments will be only at the request of the examiner.

Berrick Salome Parish – Submission Neighbourhood Plan  
Comments to be forwarded to independent Examiner

Thank you for your email on 15 April 2019 inviting Oxfordshire County Council (OCC) to comment on your Submission Draft Neighbourhood Plan.

OCC continues to support in principle the ambition of Berrick Salome Parish Council to adopt a Neighbourhood Plan.

Our comments follow those provided at the pre-submission draft stage in January 2019. We note that our comments have been copied into the Consultation Statement and on page 37 of that statement there is a response. As our previous comments are already available in that format we have not copied them again, as the information and advice contained in them can be used in the Examiner's considerations.

We note that our advice was incorporated in Policy BER8 Managing Traffic relating to traffic calming measures and pedestrian refuges. We also note, your neighbourhood plan has been updated to reflect the submitted version of the Local Plan's classification of Berrick Salome as a 'smaller village' and Roke as an 'other village', both allowing for infill development.

We do not have any additional comments in response to your Submission Draft Neighbourhood Plan.

We do not request a public examination. We seek to be kept informed of any decisions on this neighbourhood plan.

## Public examination

Q6. The majority of examinations are expected to be through written representations, however the examiner will decide whether there is a need for a public examination. Please indicate below whether you think there should be a public examination on the Berrick Salome Neighbourhood Plan:

No, I do not request a public examination

## Your details and future contact preferences

Q8. How your personal details will be used Responses to the publicity period will be forwarded to the independent examiner. This will include comments, names and contact details and is required by Part 5, Regulation 17 of the Town and Country Planning (Neighbourhood Planning) Regulations 2012. We have received assurance that the data will be kept securely and not used for any other purpose. The examiner will retain the data until after we decide whether or not to adopt the plan and the deadline for a Judicial Review has passed. This is six weeks after a decision notice has been published. Vale of White Horse District Council will hold the data for up to six years after a decision notice has been published. Representations submitted by individuals will be published on our website alongside their name. No other contact details will be published. Representations submitted by businesses or organisations will be published in full, including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection) (\* denotes mandatory question)

<b>Title</b>	-
<b>Name</b>	Venina Bland
<b>Job title (if relevant)</b>	Planner
<b>Organisation (if relevant)</b>	Oxfordshire County Council
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	County Hall
<b>Address line 2</b>	New Road
<b>Address line 3</b>	-
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX1 1ND
<b>Telephone number</b>	-
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## Response 5

### Respondent Details

Information	
<b>Respondent Number:</b> 5	<b>Respondent ID:</b> 118392388
<b>Date Started:</b> 04/06/2019 08:47:37	<b>Date Ended:</b> 04/06/2019 08:51:23
<b>Time Taken:</b> 3 mins, 46 secs	<b>Translation:</b> English
<b>IP Address:</b>	<b>Country:</b> United Kingdom

Q1. Are you completing this form as an:
Organisation

### Your comments

<p>Q2. You can provide your comments on the Berrick Salome 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. If you wish to provide evidence and any supporting documents to support/justify your comments, there is a facility to upload your documents below. After this stage, the opportunity for further comments will be only at the request of the examiner.</p>
<p>Thank you for inviting Highways England to comment on Berrick Salome Neighbourhood Plan.</p> <p>Highways England 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 Highways England 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.</p> <p>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.</p> <p>We have reviewed the above consultation and have no comments.</p>

### Your details and future contact preferences

Q8. How your personal details will be used Responses to the publicity period will be forwarded to the independent examiner. This will include comments, names and contact details and is required by Part 5, Regulation 17 of the Town and Country Planning (Neighbourhood Planning) Regulations 2012. We have received assurance that the data will be kept securely and not used for any other purpose. The examiner will retain the data until after we decide whether or not to adopt the plan and the deadline for a Judicial Review has passed. This is six weeks after a decision notice has been published. Vale of White Horse District Council will hold the data for up to six years after a decision notice has been published. Representations submitted by individuals will be published on our website alongside their name. No other contact details will be published. Representations submitted by businesses or organisations will be published in full, including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection) (\* denotes mandatory question)

<b>Title</b>	Mrs
<b>Name</b>	Beata Ginn
<b>Job title (if relevant)</b>	Assistant Spatial Planning Manager
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<b>Organisation representing (if relevant)</b>	-
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<b>Address line 2</b>	Walnut Tree Close
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<b>Postal town</b>	Guilford
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<b>Telephone number</b>	+44 (0) 300 470 1118
<b>Email address</b>	Beata.Ginn@highwaysengland.co.uk

## Response 6

### Respondent Details

Information	
<b>Respondent Number:</b> 6	<b>Respondent ID:</b> 118539670
<b>Date Started:</b> 05/06/2019 13:44:13	<b>Date Ended:</b> 05/06/2019 13:53:21
<b>Time Taken:</b> 9 mins, 8 secs	<b>Translation:</b> English
<b>IP Address:</b>	<b>Country:</b> United Kingdom

Q1. Are you completing this form as an:
Organisation

### Your comments

<p>Q2. You can provide your comments on the Berrick Salome 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. If you wish to provide evidence and any supporting documents to support/justify your comments, there is a facility to upload your documents below. After this stage, the opportunity for further comments will be only at the request of the examiner.</p>
Please see attached.

Q3. You can upload supporting evidence below
<ul style="list-style-type: none"><li>File: 2019-06-05 Berrick Salome Reg 16 Response - FINAL.pdf</li></ul>

<p>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.</p>
As above.

### Your details and future contact preferences

Planning services

**HEAD OF SERVICE: ADRIAN DUFFIELD**



Listening Learning Leading

**Contact officer: Robyn Tobutt**

Robyn.Tobutt@southandvale.gov.uk

Tel: 01235 422600

5 June 2019

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

South Oxfordshire District Council has worked to support Berrick Salome Parish Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan review.

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 Berrick Salome Neighbourhood Development Plan (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

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

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

Robyn Tobutt  
**Planning Policy Officer (Neighbourhood)**



Please note the **yellow highlighted** text shows our recommended changes to the text.

Ref.	Section/Policy	Comment/Recommendation
1.	Front cover	The plan period needs updating to '2019-2034'.
2.	Page 9 – Paragraph 2.3	It says '45% of parishioners', however this statistic is taken from the Neighbourhood Plan Survey, therefore we recommend this is amended so that it reads ' <b>45% of respondents to the survey</b> '. This more accurately reflects the results.
3.	Page 9 - Footnote	Formatting at the bottom of the page.
4.	Page 12 – Paragraph 2.28	It says '57% of parishioners', however this statistic is taken from the Neighbourhood Plan Survey, therefore we recommend this is amended so that it reads ' <b>57% of respondents to the survey</b> '. This more accurately reflects the results.
5.	Page 13 – Paragraph 2.32	It says '90% of parishioners', however this statistic is taken from the Neighbourhood Plan Survey, therefore we recommend this is amended so that it reads ' <b>90% of respondents to the survey</b> '. This more accurately reflects the results.
6.	Page 14 – Paragraph 2.41	Remove the first full stop in this paragraph.
7.	Page 18 – Paragraph 3.10	We recommend that the emerging Local Plan is referred to as the 'final publication version 2 <sup>nd</sup> ' at this stage. This is to reflect that the plan is subject to change until it has been through examination and adopted.
8.	Page 21 – Paragraph 3.25	When referring to listed buildings the correct terminology should be used, Grade I, Grade II or II*. We therefor suggest 'Grade 2' is replaced with ' <b>Grade II</b> ', and 'Grade 2*' is replaced with ' <b>Grade II*</b> '.
9.	Page 24 – Paragraph 5.6	<p>The final sentence of this paragraph could be rewritten to better reflect the consideration of the development framework in decision making.</p> <p>We suggest:</p> <p><b><i>'Planning applications that are within the neighbourhood area will be considered against the neighbourhood plan policies, as well as any relevant South Oxfordshire development plan policies and the NPPF.'</i></b></p>
10.	Page 25 – Policy BER1 Settlement Boundaries & Infill Development	This policy includes all the settlements in the neighbourhood area, including Rokemarsh. However, as the supporting text to the policy acknowledges Rokemarsh is not listed in the

Ref.	Section/Policy	Comment/Recommendation
		<p>settlement hierarchy in the Core Strategy 2012, nor is it acknowledged as a settlement in the emerging Local Plan 2011-2034, or Settlement Assessment Background Paper 2018.</p> <p>Policy CSS1 in the Core Strategy sets out the overall strategy for the district. It identifies appropriate development in towns, larger villages, smaller villages, other villages, and outside the towns and villages. Given Rokemarsh is not identified in the settlement hierarchy, it falls within the 'outside the towns and villages' category. Policy CSS1 identifies that <i>'outside the towns and villages, and other major developed sites, any change will need to relate to very specific needs such as those of the agricultural industry or enhancement of the environment'</i>.</p> <p>This is also in line with the emerging Local Plan 2034, in which Policy STRAT1 identifies that <i>'protecting and enhancing the countryside and particularly those areas within two AONB and Oxford Green Belt by ensuring that outside of the towns and villages any changes relate to very specific needs such as those of the agricultural industry or enhancement of the environment'</i>.</p> <p>The Settlement Assessment Background Paper 2018, which forms part of the evidence base for the emerging Local Plan lists Rokemarsh as a settlement not in the hierarchy (Appendix 7), where it states <i>'the following settlements have been considered through the settlement assessment, however following the methodology outlined in this report they were not considered suitable location for development and have not been included in the hierarchy'</i>.</p> <p>Given the position of Rokemarsh in the adopted Core Strategy and the consideration of the settlements outcome in the recent Settlement Assessment Background Paper 2018 informing the emerging Local Plan (2034), the settlement of Rokemarsh is not considered a sustainable settlement capable of sustaining development.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>The inclusion of Rokemarsh in BER1 and the settlement boundary drawn around it is in conflict with the adopted development plan and emerging local plan and this may encourage development in an unsustainable location.</p> <p>National Planning policy does not prohibit neighbourhood plans from promoting more development than set out in the strategic policies for the area. However, having reviewed the evidence supporting the neighbourhood plan, we are not convinced that this is the intention.</p> <p>Appendix A1 in the evidence base documents provides an explanation for the settlement boundary around Rokemarsh, it states:</p> <p><i>'Rokemarsh is a small settlement which has a concentration of houses around a triangle and a number of houses extending down a lane. It is on the edge of The Parish and with planned developments in <u>Benson the boundary has been drawn tight to ensure that there is as much countryside and space between Rokemarsh and Benson as possible so that it maintains its individual identity. Similarly, to the north the boundary cuts through the garden of Ten Trees to maintain a landscape gap between Roke and Rokemarsh</u>'.</i></p> <p>It appears that the purpose of the proposed boundary around Rookemarsh is to maintain the separation of Rookemarsh, Benson and Roke.</p> <p>As explained above, the council is concerned that the proposed boundary in Rookemarsh will conflict with Policy CSS1. We are also concerned that it may fail to act as an appropriate mechanism to deliver the objectives of the plan.</p> <p>As such, we suggest that the proposed boundary in Rookemarsh is removed and instead, a local gap policy is introduced.</p> <p>A local gap policy could be worded as follows:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>'Any proposals for development within the identified Gap as shown in Figure XX should not, either individually or cumulatively, unacceptable detract from the character and/or scale of the gap between Rokemarsh and Benson and should conserve the open and tranquil character of the landscape and its views.'</i></p> <p>To support the policy, maps should be produced to identify the areas covered by the policy.</p>
11.	Page 25 – Supporting text – Paragraphs 5.7-5.11	The supporting text will need updating to reflect the changes to the policy.
12.	Page 26/28 - Maps	The maps will need updating to reflect the changes to policy BER1.
13.	Page 29 – Policy BER2 Design	<p>This policy contains three sets of bullet points and spans over two pages, it is very repetitive and could be clearer.</p> <p>The NPPG requires that neighbourhood plan policies are clear and unambiguous, therefore we propose the Examiner considers making a number of modifications to BER2. Our recommendations are as follows:</p> <p>The first paragraph which starts <i>'A large part of The Parish...'</i> and finished <i>'within the wider countryside'</i>, is text that could be within the supporting text. Within this paragraph 'Grade 2' should be replaced with <b>'Grade II'</b>.</p> <p>The first set of bullet points cover similar areas as the paragraph that starts <i>'Proposals must show clearly how the scale...'</i> and finished <i>'... as defined in the adopted Character Appraisal'</i>. We suggest that the bullet points might be better suited in the supporting text or character appraisal, given they are setting out what the local character is derived from.</p> <p>From the second set of bullet points, criteria IX and XI are effectively repeating the same point, with IX focused on driveways and sustainable drainage systems, and XI focused on hardstanding. The NPPF requires that policies are concise. We suggest that XI is deleted and the wording of IX amended as such:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>'Permeable surfaces on driveways and hardstanding and use of sustainable drainage systems that can connect directly to an existing or new wet environment wherever possible;'</i></p> <p>The paragraph that starts <i>'Buildings should be considered...'</i> and ends <i>'...by roof forms and chimneys'</i>, is text that we suggest is moved to the supporting text or into the character appraisal.</p>
14.	Page 31 – Paragraph 5.12	<p>In this paragraph it says, <i>'All proposals...should demonstrate via a Design and Access Statement...'</i>. The requirement for the Design and Access Statement is an administrative issue and it might not be required on all applications, we therefore suggest that <i>'where appropriate'</i> is inserted into the text.</p>
15.	Page 32 – Policy BER3 Entry Level Homes	<p>Saved Policy H10 in the Local Plan 2011 is the rural affordable housing on exception sites policy. This sets out the criteria for considering rural exception sites.</p> <p>The supporting text in the South Oxfordshire Local Plan 2011 sets out that, <i>'the planning authority must be convinced of the need for affordable housing in a particular village and be satisfied that the housing provided would be available at a price which local people could afford'</i> (paragraph 5.48). This situation is the same in the emerging Local Plan 2034.</p> <p>To align with national and local policy we suggest <i>'need in the District'</i>, is replaced with <i>'need in the village'</i> in the first sentence.</p> <p>Criteria i and ii are effectively repeating points which the NPPF discusses when talking about entry-level exception sites in paragraph 71.</p> <p>Criteria iii The identified Important Views do not prevent development from coming forward. The location of a site within a Conservation Area also does not prevent development from coming forward. There are statutory tests for considering development affecting Conservation Areas and the impact of development should be focused on harm. Similarly, the impact on views should</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>be focused on harm. We suggest this criterion is reworded:</p> <p><i>'The development of the site does not cause significant harm to the identified Important Views or harm to any designated heritage assets.'</i></p> <p>Criteria iv Subject to the changes in 10., update to remove Rokemarsh.</p> <p>We recommend that the final sentence of the policy is deleted as it does not have regard to the NPPF or local policy. The policy is based on local need, therefore restricting it to one site during the plan period is not appropriate. The first sentence of the plan identifies when this type of development is appropriate – 'should there be an established need in the village' – therefore this final sentence would conflict with this.</p>
16.	Page 32 – Paragraph 5.15 - 5.17	<p>Paragraph 5.15 Update this paragraph to refer to local need, as opposed to South Oxfordshire's need.</p> <p>Paragraph 5.17 This paragraph talks about the restrictive nature of BER3, this will need updating subject to the changes above being made.</p>
17.	Page 33 – Policy BER4 Important Views	<p>We suggest that the wording of the final paragraph is improved to make it less restrictive. We suggest that instead of focusing on development proposals that 'are located within or immediately adjoining', that the focus is shifted to development proposals that '<i>have an adverse impact</i>' on the views.</p> <p>Our recommendation from the pre-submission consultation remain, we suggest the following wording:</p> <p><i>'Development proposals should preserve or enhance the local character of the landscape and not have a significant adverse impact on the identified Important Views.'</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Our comments remain the same from the pre-submission consultation, in that we are concerned that the evidence supporting the policy is not currently sufficient to justify some of the views identified. Although the character appraisal in the evidence base talks about views throughout the appraisal and there is a section titled 'Important Views', the evidence base does not identify why these views are important. The text that sits alongside the images in the plan does not explain why the views are important, it factually explains what the views are of, for example 'view south across horse paddocks and stabling'.</p> <p>A large majority of the views are from public highways, looking over field boundaries. We think that more explanation needs to be provided setting out why these views are important and why they deserve the additional protection afforded to them through policy BER4.</p> <p>We are concerned that some of the views as shown by arrows on the map do not accurately relate to the views identified in the images. We therefore recommend that the map is reviewed to ensure that the arrows which represent the views are accurately related to the images.</p>
18.	Page 36 – Policy BER5 Local Green Spaces	<p>The final sentence of the policy seems incomplete, we suggest that it reads:</p> <p><i>'New development will not be permitted on land designated as Local Green Space except in very special circumstances.'</i></p>
19.	Page 36 – Paragraph 5.20	<p>We suggest that paragraph 101 of the NPPF is also referred to as this paragraph also relates to Green Space designations. It should read:</p> <p><i>'... in accordance with paragraph 99, 100 and 101 of the NPPF.'</i></p>
20.	Page 38 – Policy BER7 Community Facilities	<p>Our comments from the pre-submission consultation remain unchanged:</p> <p>We recommend that the list of community facilities is moved to the supporting text, rather than being in the policy. This will help to futureproof the plan.</p>

Ref.	Section/Policy	Comment/Recommendation
21.	Page 38 – Paragraph 5.23	We recommend that in the sentence, <i>'It identifies a number of buildings in The Parish that form an essential part of life'</i> , the word <i>'building'</i> is replaced with <i>'facilities'</i> . This is to reflect that not all the community facilities are buildings, for example the allotments.
22.	Page 39 – Policy BER8 Managing Traffic	<p>This policy is currently restrictive and could be better worded to guide development positively.</p> <p>We recommend that the policy text is deleted and replaced with the following wording:</p> <p><i>'Development proposals will be supported provided that, where appropriate, they make the necessary contributions to mitigate their impact on the highway network.'</i></p> <p><i>'Improvements to the highway network in the Parish should be in keeping with the character of the area, and where possible avoid urbanising highways infrastructure.'</i></p>
23.	Page 40 – Policy BER9 Walking, Cycling and Riding	<p>The first bullet point We suggest 'must' is replaced with <i>'should'</i>.</p> <p>Third bullet point We suggest that this bullet point is reworded as follows:</p> <p><i>'it is located in an area which facilitates and where possible encourages walking, cycling and riding to access the Parish.'</i></p>
24.	Page 41 – Policy BER10 Supporting Water Infrastructure	<p>Criteria ii This criteria is repeating a point already raised in BER2 Design. We recommend that this point is only raised once in BER2 as it is more in keeping with the design policy.</p> <p>Criteria iii This criterion is not achieving anything beyond criterion i. The NFFP is clear that plans should <i>'serve a clear purpose, avoiding unnecessary duplication of policies'</i> (para 16). We therefore recommend that this criterion is deleted from the policy.</p>
25.	Page 41 – Paragraph 5.33	The second paragraph states that BER10 <i>'requires proposals to be accompanied by a site-specific assessment...'</i> . However, this is not the case and therefore we advise that this sentence is deleted.



Ref.	Section/Policy	Comment/Recommendation
26.	Page 44/45/46/47 – Appendix 1: Drawing of settlement boundaries	This appendix is duplicating information that is in the evidence base document.
27.	Page 48/49 – Appendix 2: Settlement Boundary Assessment Guidance	This appendix is duplicating information that is in the evidence base document.
28.	Page 48/49 - Appendix	<p>We suggest that that the evidence base report is included as an appendix to the neighbourhood plan.</p> <p>The evidence base document contains the character appraisal, information on the green spaces, and information on the important views. It is important that this information can be easily linked to the policies they support, for example the character appraisal is important for the interpretation of BER2.</p> <p>This would also address the duplication issue above.</p>

Q8. How your personal details will be used Responses to the publicity period will be forwarded to the independent examiner. This will include comments, names and contact details and is required by Part 5, Regulation 17 of the Town and Country Planning (Neighbourhood Planning) Regulations 2012. We have received assurance that the data will be kept securely and not used for any other purpose. The examiner will retain the data until after we decide whether or not to adopt the plan and the deadline for a Judicial Review has passed. This is six weeks after a decision notice has been published. Vale of White Horse District Council will hold the data for up to six years after a decision notice has been published. Representations submitted by individuals will be published on our website alongside their name. No other contact details will be published. Representations submitted by businesses or organisations will be published in full, including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection) (\* denotes mandatory question)

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