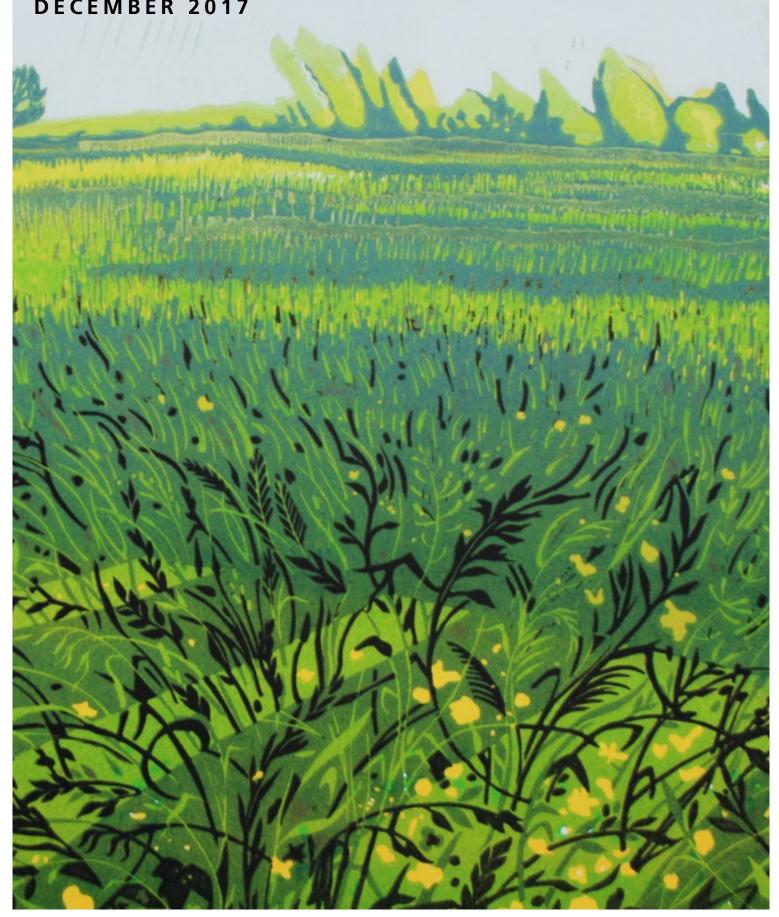
Radley Neighbourhood Plan, 2018–2031 Basic Conditions Statement

RADLEY PARISH COUNCIL: DECEMBER 2017



INTRODUCTION

Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990, as inserted by Schedule 10 of the Localism Act 2011, requires that a Neighbourhood Development Plan (NDP) must meet the following basic conditions.

- (i) Having regard to **national policies and advice** contained in guidance issued by the Secretary of State, it is appropriate to make the NDP.
- (ii) The making of the NDP must contribute to the achievement of sustainable development.
- (iii) The making of the NDP must be in general conformity with the strategic policies in the development plan for the area, in this case the Vale of White Horse District Council (VWHDC) Local Plan Part 1: Strategic Sites and Policies. December 2016.
- (iv) The making of the NDP does not breach, and is otherwise compatible with EU obligations.
- (v) The prescribed conditions are met.

This statement is prepared by Radley Parish Council (RPC) in support of its draft Radley Neighbourhood Plan (RNP), and addresses these requirements in four sections as follows.

- Section 1 describes the legal context and coverage.
- Section 2 shows how the RNP will contribute to sustainable development (ii above).
- Section 3 demonstrates how RPC relates to the NPPF and the VWHDC Local Plan Part 1 (i and iii above).
- Section 4 demonstrates compatibility with EU obligations (iv above).

The prescribed conditions (v. above) are not relevant to the Radley Neighbourhood Plan as they apply only where the plan is likely to have a significant effect on a European site or European offshore marine site¹, neither of which exist in the Neighbourhood Plan area or its immediate vicinity.

¹ As defined in the Conservation of Habitats and Species Regulations 2012 and the Offshore Marine Conservation (Natural Habitats, etc) Regulations 2007.

SECTION 1: LEGAL CONTEXT AND COVERAGE

The draft Radley Neighbourhood Plan 2018 -31 (RNP) is prepared and submitted by Radley Parish Council, which is a qualifying body under the Localism Act 2011.

The draft RNP relates to the whole of Radley parish with the exception of an area of land to the west of the parish which forms part of the North Abingdon strategic site, allocated for housing under the VWHDC Local Plan Part 1. The Neighbourhood Plan area was designated by VWHDC on 15 June 2015. The parish and RNP area boundaries are shown on a map on the inside front cover of the draft RNP.

The draft RNP specifies the period covered by the RNP as 2018-31. The end-date has been chosen to coincide with the end-date for the VWHDC Local Plan Part 1.

The draft RNP includes two types of policy: planning policies designed to help the local planning authority decide planning applications; and community actions which are policies requiring action or advocacy on the part of RPC, most often working with others. It is intended that the two types of policy should work together to promote sustainable development in the area. This statement deals only with the planning policies as these are the policies against which conformity with the Basic Conditions must be judged.

SECTION 2: CONTRIBUTION TO SUSTAINABLE DEVELOPMENT

The National Planning Policy Framework (paragraph 16) says that the presumption in favour of sustainable development means that neighbourhoods should:

- i. develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
- ii. plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.
- i. Supporting strategic needs identified in the Local Plan. The VWHDC Local Plan Part 1 contains proposals for the construction of 510 new dwellings on strategic housing sites in the RNP area, and a further 390 within the parish outside the RNP area. These homes will contribute to the housing needs of the area and to a strengthening of the wider local economy by providing homes to support the job growth. The larger part of the annual supply of new housing which the Strategic Housing Market Assessment estimates to be needed in the Vale of White Horse district is required to support committed economic growth².

RNP supports these proposals by identifying policies relevant at the parish level which will contribute to the effective delivery of the strategic housing sites. These are set out in detail in tables 1(a) to 1(c). They include policies dealing with local roads and access, cycle and pedestrian routes, meeting local housing needs, providing community facilities and infrastructure, access to the station, protecting local archaeology and the natural environment, and promoting connectivity between the new and existing communities.

ii. Planning to support local non-strategic development. RNP also contains policies for local development which are independent of the strategic housing sites identified. These include the identification of two smaller sites where development may be supported if certain prior conditions are met, and a planning framework for future land-use in the Radley Lakes area in the south of the parish. More detail is again in table 1(a) to 1 (c).

Paragraph 7 of the National Planning Policy Framework identifies three dimensions to sustainable development: economic, social and environmental. Tables 1(a) - 1(c) below list the policies which support each of these dimensions. Many of the policies contribute to more than one dimension.

Table 1(a). RNP and delivering economic sustainability				
NPPF definition	Contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.			
Relevant RNP planning policies	PP 10 (e) Radley Lakes. This supports permanent industrial development on brownfield land in the Radley Lakes area if access, flooding, nature conservation and landscape issues can be resolved.			
Commentary	The main RNP contribution to building a competitive economy comes indirectly through support for new housing in the RNP area, which in turn is needed to support the growth of the wider local economy – see general comment above.			

Table 1(b). RNP and delivering social sustainability				
NPPF definition	Support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being			
Relevant RNP planning policies	PP.1 Old coal yard site. Development on the old coal yard to the west of Thrupp Lane will be supported where listed criteria are met.			
	PP.2 Central allotments site. Development of the central allotments by the railway bridge will be supported where listed criteria are adequately addressed.			
	PP.4 Housing size and type. Decisions on the mix of dwelling size and type on largescale housing sites should take account of evidence of local demand as well as the district-wide SHMA.			
	PP.5 Self build. Provision of plots for self-build will be supported.			
	PP. 6 Facilities on the North-West Radley site. The North West Radley site should include a playground positioned so as best to complement existing provision.			
	PP. 7 Facilities on the South Kennington housing site. The South Kennington site should include a playground and should reserve a space for a shop and a community room.			
	PP.9 <u>Primary healthcare</u> . Developers of largescale housing sites should, in consultation with the relevant Clinical Commissioning Groups, explore opportunities to provide new or expanded primary healthcare facilities.			
	PP. 10 <u>Radley Lakes</u> . Policy supports development subject to conditions designed to promote the strategy to create an area of nature conservation and quiet recreation.			
	PP.11. <u>Roads</u> . New development should support the achievement of the Radley Roads Strategy which includes measures to promote road safety.			
	PP.12 Cycling and walking. New development should support the Radley Cycling and Walking Strategy			
	PP.13. Connectivity. Good quality and convenient 'inward' pedestrian and cycle access to village facilities and amenities should be provided at the strategic sites to promote connectivity to the established village and its facilities.			
Commentary	 These policies contribute to social sustainability by: helping to meet local housing needs through the provision of evidence on needs within the parish to inform the mix of development at the strategic sites; and by identifying two small sites where further housing development will be supported if stated criteria are met. Requiring developer involvement in the provision of new or improved community facilities, a shop and healthcare services. Contributing to the health and well-being of the community through measures to support cycling and walking, to promote local opportunities for recreation in the Radley Lakes area and to support the provision of play areas on the new sites. Promoting 'connectivity' between the new housing and central village facilities to secure an integrated and supportive community. Promoting improvements to the road network to improve road safety. 			

Table 1(c).	RNP and delivering environmental sustainability			
NPPF definition	Contribute to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.			
Relevant RNP planning policies	PP.3. <u>Green Belt</u> . Inappropriate development in the Green Belt will not be approved except in very special circumstances.			
	PP.10 <u>Radley Lakes</u> . Policy supports development subject to conditions designed to promote the strategy to create an area of nature conservation and quiet recreation.			
	PP.12 <u>Cycling and walking.</u> New development should support the Radley Cycling and Walking Strategy			
	PP.13. Connectivity. Good quality and convenient 'inward' pedestrian and cycle access to village facilities and amenities should be provided at the strategic sites to promote connectivity.			
	PP. 14 <u>Radley station</u> . Developers should contribute to the cost of measures to improve facilities at Radley station.			
	PP.15 <u>Surface drainage</u> . This policy requires that development should not add to surface water run-off and hence increase the risk of flooding.			
	PP. 16 Sewerage. This policy requires that the impact of development on sewerage infrastructure should be investigated and the developer should pay for any improvement which may be necessary.			
	PP. 17 <u>Historic Environment</u> . This policy sets out steps to be taken in determining applications for sites with archaeological interest.			
Commentary	 These policies contribute to environmental sustainability by encouraging cycling, walking and the use of the train service; promoting the development of the Radley Lakes area as a centre for nature conservation; affirming support for the protection of the Green Belt; requiring development to address surface water run-off and local sewerage issues; requiring that potential archaeological deposits are investigated before development takes place. 			

SECTION 3: RELATIONSHIP WITH NATIONAL PLANNING POLICIES AND THE LOCAL PLAN.

The basic conditions require that the Plan must have appropriate regard to national policies and advice, which can be found in the National Planning Policy Framework (NPPF). The Plan must also be in general conformity with the strategic policies in the VWHDC Local Plan. Delivery of each of these requirements is demonstrated policy by policy in Table 2 on the following pages.

Table 2: RNP policies related to policies in the NPPF and VWHDC Local Plan Part 1

Radley Neighbourhood Plan Planning Policy

Relevant policies contained in the National Planning Policy Framework (NPPF)

Conformity with policies in VWHDC Local Plan Part 1: Strategic Sites and Policies. December 2016

References are to Core Policy (CP) numbers

PP.1 Old coal yard site.

Development on the old coal yard to the west of Thrupp Lane will be supported where the following criteria are adequately addressed.

- The development should provide satisfactorily for the mitigation of transport consequences and directly or indirectly enhance the safety and amenity of Thrupp Lane.
- The scheduled monument (archaeological remains) on the west side of the site should be protected through a conservation management plan agreed with the County Archaeologist.
- The development should be in accord with a master plan which minimises any sense of intrusion into the Green Belt and restores a rural character free of dereliction. The masterplan should include measures for locating development to the east of the site, for retention of tree belts and for the removal of hard standings and remedying contamination issues.
- Arrangements for sewerage should be agreed with Thames Water.

This is a brownfield site in the Green Belt close to Radley village, accessed by Thrupp Lane. A small part of the site is in a Scheduled Monument.

This policy is consistent with

- the Core Planning Principles (paragraph 17 NPPF), and in particular the requirement for "the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value".
- the rules for 'Protecting Green Belt land' (paragraph 79-92 NPPF) which include "limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land)" as an exception to the rule that the construction of new buildings should be regarded as inappropriate.
- the requirements for 'Conserving and enhancing the historic environment' (paragraphs 126-141 NPPF) which indicate that development involving substantial harm to a scheduled monument should be avoided (paragraph 132 NPPF).

This policy conforms with:

- CP 13 (The Oxford Green Belt), which echoes the terms of paragraph 89 of the NPPF (see second bullet in previous column) in making derelict land an exception to the rule against development in the Green Belt.
- CP 39 (the Historic Environment), which seeks to ensure the conservation and where possible the enhancement of heritage assets.

While this policy does not formally allocate the land for development as envisaged under CP 4 (Meeting our Housing Needs), it conforms with that policy's requirements that development may be permitted outside the existing built area of larger villages where it is adjacent to or well-related to the existing built area and delivers necessary supporting infrastructure.

PP.2 Central allotments site

Development of the central allotments by the railway bridge will be supported where the following criteria are adequately addressed.

- Appropriate measures should be taken to remedy any contamination issues or instability from previous land uses and the main sewer under the site should be adequately protected.
- A suitable replacement allotment site should be provided by the Parish Council which is of at least equivalent quality and is located at reasonable convenience to the community.
- Radley Village Shop should be given an option to occupy part of the site.

This site is within the built-up area of the village, inset from the Green Belt, and is in a highly sustainable location near the station, bus route, pub and existing village shop. It is a possible location for a larger village shop.

This policy is consistent with the Core Planning Principles (paragraph 17 NPPF). In particular it aims to:

- 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs';
- 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable';
- support local strategies to 'deliver sufficient community and cultural facilities and services to meet local needs'

It also accords with the requirement that development sites are suitable for their new uses taking account of ground conditions and land instability (paragraph 121 NPPF).

This site is within the built-up area of the village on 'inset' land which is not in the Green Belt. Development is thus consistent with CP 4 (Meeting our Housing Needs) which states a presumption in favour of sustainable development within the existing built-up area of Larger Villages, of which Radley is one. CP13 (The Oxford Green Belt) does not apply.

PP.3. Green Belt

The Green Belt round Radley will be protected to maintain its openness and permanence. Inappropriate development outside the strategic housing sites and the Green Belt 'inset' area will not be supported except in very special circumstances.

This policy echoes paragraphs 79 and 89 of the NPPF (Protecting Green Belt land) to preclude inappropriate development in the Green Belt.

This policy is in the same terms as CP 13 (The Oxford Green Belt) and precludes inappropriate development on land designated as Oxford Green Belt except in very special circumstances. It is included in RNP to reinforce the policy and underline its importance to the local community.

PP.4 Housing size and type at largescale sites

Decisions on the mix of dwelling size and type on largescale housing sites should take account of the Oxfordshire SHMA size mix guidelines for both the Vale of White Horse District and Oxford City. They should also take account of the evidence of demand from Radley residents and their families, and of the guideline figures for housing for older people, set out in RPC's paper Housing Requirements for the Radley Strategic sites.

Paragraphs 47-55 of the NPPF (Delivering a wide choice of high quality homes) require inter alia that local planning authorities should

- 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community';
- 'identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand' (paragraph 50).

It is consistent with this requirement that decisions on housing mix should take account of up-to-date

CP 22 (Housing Mix) requires that the mix of dwelling types and sizes should be in accordance with the VWHDC current SHMA. The SHMA includes a suggested percentage distribution for 1 to 4+ bedroom dwellings but also says that in applying these guidelines to individual sites 'regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level'. This policy identifies two additional sources of local

This paper draws on the responses to a housing requirements survey undertaken by RPC in May 2016 and is available as a supporting document to the draft RNP.	evidence of demand from within Radley itself and of the SHMA projections for neighbouring Oxford City as well as the percentage distribution identified in the VWHDC-wide SHMA projections.	evidence of need, as such complementing and broadly conforming with CP 22. CP 26 (Accommodating Current and Future Needs of an aging population) requires the provision of dwellings for older people on the strategic sites and other suitable locations. This policy complements this policy by identifying guideline figures for the proportion of housing needed for older people, drawn from RPC's survey of local housing needs.
PP.5 <u>Self build</u> Provision of plots for self-build will be supported.	Paragraph 50 of the NPPF requires authorities to plan for new housing to reflect local demand. In accordance with this requirement, this policy reflects evidence from the Radley housing survey showing demand for self-build.	There is no policy for or against self-build in the Local Plan Part 1.
PP. 6 <u>Facilities on NW Radley site</u> The North-West Radley housing site should include a playground positioned so as to complement existing provision in the village.	Paragraph 70 of the NPPF requires that planning policies should plan positively for the provision of community facilities and paragraph 73 requires policies to take account of evidence of need for open space, sports and recreational facilities (Promoting healthy communities). This policy promotes those requirements.	This policy conforms with CP 37 (vii) (Design and Local Distinctiveness) which requires that all proposals for new development address the needs of all in society by incorporating mixed uses and facilities.
PP. 7 Facilities on South Kennington housing site The South Kennington housing site should include a playground and should reserve a space for a shop and a community room.	This policy promotes the requirements in paragraphs 70 and 73 of the NPPF as described above	This policy conforms with CP 37 (vii), as above.
PP. 8 Replacement sites and buildings Where replacement sites or buildings are needed for community facilities, they should, unless in situ construction make this impracticable, be ready before the old facilities are removed.	This policy responds to a concern expressed during public consultation and is not inconsistent with policies the NPPF.	This policy responds to a concern expressed during public consultation and is not inconsistent with strategic policies in the VOWH Local Plan.

PP.9 Primary healthcare

Developers of largescale housing sites should, in consultation with the relevant Clinical Commissioning Groups, explore opportunities to provide new or expanded healthcare facilities to meet the need generated by the additional development on those sites.

This policy is consistent with paragraph 70 of the NPPF (Promoting healthy communities), which requires that planning policies should plan positively for the provision of community services.

There is no policy in the VOWH Local Plan Part 1 relating to healthcare services but the need for developer support for local primary care provision is anticipated in the updated Infrastructure Delivery Plan, December 2016, p 59.

PP.10 Radley Lakes

10. a) This policy applies to the Radley Lakes area, as defined in Map 7. As minerals and waste are a county matter outside the scope of the Neighbourhood Plan, the policy does not apply to minerals or waste activities or to development which might prejudice compliance with planning conditions applying to such activities.

10.b) For any development in the area to be supported it must:

- comply with Local Plan policy CP13, which sets out limited circumstances in which Green Belt development might be justifiable
- avoid detriment to the wider landscape within which the site sits, and be accompanied by appropriate levels of landscape planting and natural screening necessary to achieve this;
- comply with Local Plan policy CP42, which requires a site-specific flood risk assessment for all development in Flood Zone 2 and 3 and for appropriate mitigation and management measures to be implemented;
- avoid detriment to the ecology of the Conservation Target Area, and incorporate appropriate off-site mitigation and enhancement necessary to achieve this;
- include appropriate transport mitigation.

10.c) Development which directly promotes nature conservation and/or quiet recreation in the area will be supported, subject to the criteria at b). This policy has regard to a number of policies in the NPPF including:

- 'Protecting Green Belt land'. Paragraph 81 of the NPPF requires planning authorities to plan positively to enhance the beneficial use of the Green Belt, by improving a damaged area, enhancing the landscape, providing an opportunity for outdoor recreation and enhancing biodiversity. Paragraphs 87-90 sets out circumstances in which development in the Green Belt may be permissible. Annex 4 to the Consultation Statement sets out the arguments demonstrating that the possible development foreseen within this policy falls within the scope of what is permissible;
- 'Conserving and enhancing the natural environment'. Paragraph 109 requires that the planning system should provide net gains in biodiversity where possible and protect and enhance valued landscapes;
- 'Promoting sustainable transport'. Paragraph 32 requires that plans should take account of whether safe and suitable access to a site can be achieved:
- 'Meeting the challenge of climate change and flooding'. Paragraph 103 requires that development is appropriately flood resilient and resistant.

The Local Plan does not contain any area-based policies directed at the Radley Lakes area, but there are relevant generic policies with which this policy is in general conformity:

- Per CP46 (Conservation and Improvement of Biodiversity) indicates that 'opportunities for biodiversity gain, including the connection of sites, large scale habitat restoration, enhancement and habitat re-creation will be actively sought with a primary focus on Conservation Target Areas'. The Radley Lakes area is almost all in a Conservation Target Area.
- CP13 (the Oxford Green Belt) defines when development in the Green Belt may not be inappropriate in the same terms as paras 87-90 of the NPPF. Annex 4 to the Consultation Statement sets out the arguments showing that the possible development foreseen within this policy falls within the scope of what is permissible;
- CP33 (Promoting Sustainable Transport and Accessibility) supports improvements to the road network which improve safety.

10.d) Development which creates new or revised access routes to or through the area will be supported, subject to the criteria at b) if it, directly or indirectly:

- improves the safety and amenity of access to the area by pedestrians and cyclists; and
- contributes to the promotion of nature conservation and quiet recreation in the Radley Lakes area.

10.e) Any other development will be supported only if it meets the criteria at b); and

- · is confined to currently built-up land;
- is served by a suitable and safe access route that avoids conflicts between vehicles accessing the site and pedestrians and cyclists accessing the wider area.

This is a carefully worded policy which supports certain types of development in the Radley Lakes area provided strict conditions are met. Development which directly promotes nature conservation and/or quiet recreation is supported provided it conforms with Green Belt policies, protects the landscape and local ecology, complies with flood risk requirements and provides for appropriate transport mitigation. The development of a new or improved access road is supported subject to the same conditions and provided it also promotes RPC's wider objectives for the area. Finally, the policy supports development on brownfield sites in the area subject to the same conditions and provided they are served by a suitable and safe access route.

PP.11. Roads

New development should support the achievement of the Radley Roads Strategy and provide, financially or in kind, for the mitigation of the effects of the development on the roads network.

The Radley Roads Strategy provides for local road improvements to mitigate the impact of development at the strategic housing sites and to improve safety on Thrupp Lane. These include improvements to the White's Lane/ Foxborough Road junction, additional safety measures on the Kennington Road alongside the South Kennington site, traffic calming and speed restrictions on Sugworth Lane and support for a new access road towards Audlett Drive to carry commercial traffic to and from the Radley Lakes area.

Paragraph 32 of the NPPF (Promoting Sustainable Transport) requires that plans and decisions should take account of whether safe and suitable access to sites can be achieved for all people.

The policy conforms with CP 33 (Promoting Sustainable Transport and Accessibility) which commits to actively seeking to ensure that the impacts of development on the local road network are is minimised. The site templates in Appendix A of the Local Plan Part 1, Strategic Sites and Policies and in the supporting Infrastructure Delivery Plan set out more detailed requirements for the two strategic sites. The Radley Roads Strategy is consistent with these requirements, but policies are set out at a more detailed local level.

PP.12 Cycling and Walking

New development should support the achievement of the Radley Cycling and Walking Strategy as follows.

- On site: new development should deliver those stretches of cycle tracks which pass through the sites; provide secure cycle storage; and incorporate good quality pavements for pedestrians and mobility scooters, with dropped kerbs onto roadways.
- Off site: where necessary to mitigate the transport impacts of the development, contributions should be made to new and improved cycletracks and pavements to link the development to Radley station and other key village facilities.

This policy promotes the Core Planning Principle (paragraph 17 of the NPPF) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.

The policy conforms with CP 35 (Promoting Public Transport, Cycling and Walking) which sets out policies for cycling and walking, including both onsite and off-site measures.

PP.13 Connectivity

Access to largescale housing developments should be designed so as to be safe, to integrate the village as a community and to avoid unnecessary car use. Vehicle access should be 'outward facing' onto, or towards, the main through route. There should additionally be good quality and convenient 'inward' pedestrian and cycle access to village facilities and amenities and to existing communities.

This policy promotes the requirement in paragraph 61 of the NPPF (Requiring Good Design) that "planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment".

CP38 (Design Strategies for Strategic and Major Development Sites) requires developers to prepare master plans which inter alia show how the development will 'integrate with the surrounding built, natural and historic environments, in particular maximising existing and potential movement connections and accessibility to encourage walking, cycling and use of public transport'. The site templates in Appendix A contain some more detailed requirements. This policy supports these principles at the local level.

PP.14 Radley Station Developers of the largescale housing developments should contribute to the costs of measures to improve facilities at Radley station and in particular to increased secure cycle storage.	This policy promotes the Core Planning Principle (paragraph 17 of the NPPF) to actively manage patterns of growth to make the fullest possible use of public transport. The existence of Radley station was a significant factor in the choice of Radley parish as a location for 3 strategic sites.	This policy is consistent with CP 35 (Promoting Public Transport, Cycling and Walking) which encourages a modal shift towards public transport. The railway station is a particularly important public transport facility in Radley and this policy is designed to promote its use.
PP.15 <u>Surface drainage</u> Development will be permitted where it is demonstrated that surface water drainage will not add to the existing site run-off or cause any adverse impact to neighbouring properties and the surrounding environment. Unless demonstrated to be inappropriate, sites should incorporate Sustainable Urban Drainage (SUDs), with run-off rates no greater than greenfield sites. SUDs where possible should be designed so as to contribute to landscaping and biodiversity of the sites and provision should be made for their future maintenance.	This policy has regard to the requirement in paragraph 103 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) that development is appropriately flood resilient and resistantand gives priority to the use of sustainable drainage systems.	CP42 (Flood Risk) contains policies on surface drainage including SUDs. The supporting Infrastructure Delivery Plan provides for the developers of the strategic sites to contribute towards upgrades of the sewerage network. These policies are consistent, but contain additional detail, reflecting the problems encountered in Radley and the importance of their resolution.
PP.16 Sewerage Development will be permitted where there is adequate sewerage infrastructure both on and off the site to serve the site and no problems will result for existing users. In the case of largescale housing developments, the developer should fund a Drainage Survey and Report, covering the whole area served by the outfall sewer, to a specification agreed with Thames Water. Where a problem is revealed and no improvements are programmed by Thames Water, the developer must demonstrate that these will be resolved prior to any occupation of the development, and fund any measures which are attributable to the load created by the development.	The NPPF does not refer specifically to sewerage but paragraph 162 (Infrastructure) requires plan makers to work with other authorities and providers inter alia to assess the quality and capacity of infrastructure for wastewater and its treatment.	

PP.17 Historic Environment

Applicants for development should review the Historic Environment Record for the area and where any heritage assets might be affected should submit a statement describing their significance and specifying measures to safeguard them. Where the proposed site has potential to contain archaeological deposits a desk based assessment, and where necessary a field evaluation, should be carried out. The County Archaeologist should be consulted on the method of assessment and on any mitigation required.

This policy draws on the requirements in paragraph 128 of the NPPF (Conserving and enhancing the historic environment) which sets out steps to be taken in determining applications for sites with archaeological interest.

CP39 (Historic Environment) provides in several respects for protection of the historic environment, but is mainly directed at buildings rather than archaeology. Given the importance of archaeology in the NP area this policy has been added drawing from the requirements of the NPPF (see previous column).

SECTION 4. EUROPEAN UNION OBLIGATIONS

In a statement dated 13 April 2017, the VWHDC Head of Planning notified Radley Parish Council that a Strategic Environment Assessment would be required in respect of Radley Neighbourhood Plan. The conclusion arose from concern that the Plan had potential for significant effects on a Local Wildlife Site in the Radley Lakes area. A Strategic Environmental Assessment was accordingly commissioned from AECOM Infrastructure and Environment UK Ltd and their report is submitted alongside the draft Plan. It finds that the proposals in the Plan perform well in terms of a range of sustainability objectives, with no major draw-backs highlighted.

There are no proposals in the RNP which would trigger requirements in EU habitats and species legislation, nor other EU obligations of which we are aware.

RPC December 2017