

Andrew Ashcroft

Independent Examiner

Ardington and Lockinge Neighbourhood Development Plan

17th August 2026

Dear Andrew,

Examiner's Clarification Note

Thank you for your Clarification Note of 29 July – we appreciate the pace and thoroughness of your approach to the examination of our draft Plan and are greatly encouraged by your Initial Comments. We have worked hard to ensure that all aspects of the Plan are based on views expressed by the community during its preparation and are pleased that this comes across to an independent, expert reviewer.

We have reviewed all the comments arising from the latest (section 16) consultation and have indicated the responses we would like to adopt (subject to your own guidance) on the attached schedule, which also summarises our reasons for each proposed response. We hope you find this helpful.

You raised a number of questions for the Parish Council, which we respond to in the order that you have adopted.

Policy AL1

Having been clear about the distinctive separate identities and physical separation of the settlement areas within the parish, we felt a non-prescriptive approach was right in the context provided by the other policies within the Plan (including defining a settlement boundary for the largest single settlement area, the village of Ardington itself).

Policy AL6

The relationship between the settlements and the surrounding countryside is a critical feature of the key views identified by residents and reflected in the Plan, which seeks to be positive but non-prescriptive about their protection.

Policy AL7

The community is proud and protective of its existing community facilities and is keen to protect and, where possible, enhance them for the benefit of future generations.

Policy AL8

The “management plans” we refer to are the planned land management activities undertaken by the owners, occupiers and managers of the farmland, woodland, water courses and other land areas that are such a distinctive feature of our parish. These are not intended to

encompass wider national or regional management strategies per se although these should be consistent with and encompass broader policies.

Policies AL9/AL10

We think the combination the District Council is suggesting is actually for Policies AL10 and AL11. We welcome the clarifications in much of the revised wording proposed by the District Council and would like to adopt it. We believe, however, that the separation into two policies is helpful and would like to retain this approach. We have set out a detailed response on the attached schedule.

Policy AL12

We also found the proposed clarifications and revised wording suggested by the District Council helpful in expressing the intent of our draft policy and would like to adopt much of the revised wording. Again, full details of our response are included in the attached schedule.

Monitoring and Review

We recognise the importance of monitoring and review in maintaining the Plan's usefulness and continuing value and have tried to strike a balance between robustness and practicality for those who will have to carry out these functions.

We would of course be pleased to help with any other points of clarification or explanation to assist you with your Examination.

With thanks for your commitment in helping us complete this substantive piece of work for our community

Your sincerely

James Vane-Tempest

Chairman

Ardington and Lockinge Parish Council

Ardington and Lockinge Neighbourhood Plan

Responses to the comments received under the Regulation 16 Publicity Period

Org. No.	Organisation	Code	Comment	Ardington & Lockinge Parish Council Response
1	Ardington House Ltd	AH1	We have no proposed changes to the wording of the policies and consider the Plan ready to proceed.	No action needed.
2	Network Rail	NR1	No policies within the plan look to impact on the operational railway however the Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway.	No action needed.
3	Thames Water	TW 1	In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5-year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text: PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT <i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i> <i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i>	The Lockinge Estate needs to be referenced as the water supplier in the Plan area, and Thames Water to be referenced for wastewater management, with both needing to be consulted before development.

		TW2 Policy AL4 - Water Efficiency/Sustainable Design We support the reference to sustainable use of water in Policy AL4, but this needs to be strengthened. The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy. Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels. Proposed policy text: <i>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</i>	A modified (and reduced) text drawing on the proposed wording from Thames Water will be placed in the supporting text for Policy AL4 in section 6.4 of the Neighbourhood Plan, indicating that development should be designed to be water efficient.
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		TW3 Comments in relation to Flood Risk and SUDS. The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. The Neighbourhood Plan should include a specific policy on SuDS in line with the following hierarchy: <i>Developers should ensure that surface water run-off is managed as close to source as possible in line with the following drainage hierarchy:</i> <i>1.store rainwater for later use</i> <i>2.rainwater infiltration to ground at or close to source</i> <i>3.rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)</i> <i>4.discharge rainwater direct to a watercourse</i> <i>5.controlled rainwater discharge to a surface water sewer/drain</i> <i>6.controlled rainwater discharge to a combined sewer</i> <i>It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.</i>	Design Code AL.SD05 already includes a hierarchy for wastewater storage and disposal.
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		TW4	Development Sites There are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing. We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed	No action needed.
4	National Highways	NH1	No comments	No action needed.
5	Historic England	HE1	At this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. <i>Comment: Two pages of "advice are provided as below.</i>	No action needed.
6	Natural England	NE1	Natural England does not have any specific comments on this draft Neighbourhood Plan. <i>Comment: Two pages of "advice are provided as below</i>	No action needed.
7	Vale of White Horse District Council	VDC1	Paragraph 2.3.6 (Page13): We recommend the following changes are made to the second sentence to ensure it accurately reflects the statutory process: <i>Once 'made' (i.e. approved following at referendum), this Neighbourhood Plan will also form a part of the Local Development Plan.</i>	Agreed.

		VDC2	The Vision (Page 19): On the 25 March 2026, the Government brought into force Two sections (S.98 and S.99) of the Levelling-up and Regeneration Act 2023(LURA). Section 99 of the LURA amended the Basic Conditions that Neighbourhood Plans must satisfy, removing the requirement for the Neighbourhood Plan to be in general conformity with the development plan and replacing it with a requirement for the Neighbourhood Plan to not prevent housing development which is proposed in the development plan from taking place. The Vision for the Neighbourhood Plan includes references to the superseded basic condition as this was the relevant basic condition at the time the plan was drafted. We recommend the 'Vision' is amended to reflect this change to the basic conditions. There is also no requirement for a Neighbourhood Plan to comply with the strategic policies of a neighbouring district. We believe the intent here was to make reference to emerging policies in our Joint Local Plan; however, as this Plan has not yet been adopted, the relevant local plan for Ardington and Lockinge is the Vale of White Horse Local Plan 2031 Parts1 and 2. To avoid any confusion and to align the text more closely with the Basic Conditions we recommend the text is modified as follows: <i>To create a Neighbourhood Plan for the Parish of Ardington and Lockinge that includes policies based on the outcomes of community engagement and consultation, is in general conformity with has regard to strategic policies in the Development Plan for the district and has regard to national planning policies and guidance. compliance with the core strategies set out in the relevant South and Vale Joint Local Development Plan</i>	Agreed.
		VDC3	The Aim (Page 19): As mentioned above in regard to the Basic Conditions updates to avoid any confusion we recommend the 'Aim' is amended to ensure it accurately reflects the latest legislation. We recommend a series of modifications to the 'Aim' to reflect the updates to the basic conditions, to amend references to 'core strategies' to 'strategic policies and objectives' for clarity, and to remove references to the South Oxfordshire Local Plan as this is not the relevant local plan for Ardington and Lockinge. <i>To create a Neighbourhood Plan for the Parish of Ardington and Lockinge that includes policies based on the outcomes of community engagement and consultation, and compliance with that is aligned with and supports the strategic policies and objectives of the Development Plan for the district. the core strategies set out in relevant South and Vale Local Development Plan.</i>	Agreed.
		VDC4	Figure 6: Location of settlements in Parish (Page 22): It is unclear what the different elements shown on Figure 6 represent without the inclusion of a key. For clarity and accuracy, we therefore recommend that the figure is amended to include a key.	The red rings highlight the various settlements, which are labelled. No key is needed.

		VDC5 Figure 8 (Page 28): We are aware that, following comments made by the District Council at the Regulation 14 consultation, the qualifying body has provided further clarity on the methodology used to define the proposed settlement boundary. This additional information is welcomed. However, notwithstanding this additional explanation, the Council remains concerned that in several locations the proposed settlement boundary has been drawn very broadly, resulting in the inclusion of areas of undeveloped land that do not form part of the built-up area of the settlement. We note that the explanation for the drawing of the settlement boundary provided in the appendices sets out that certain areas have been included within the settlement boundary for the explicit purposes of supporting future development, specifically those areas to the north of the playground and to the south of Westfield House. Additionally, other large areas of open space on the edge of the settlement are included. Settlement boundaries are effective in distinguishing the built-up area of a settlement from the surrounding countryside. Core Policy 4 of the Vale of White Horse Local Plan Part 1 sets out that within smaller villages, which Ardington is, limited infill may be appropriate within the existing built areas of these settlements and that development in the open countryside will not be appropriate unless specifically supported by other relevant policies as set out in the Development Plan or national policy. Additionally, associated policies AL2 and AL3 of the Neighbourhood Plan sets out that within the defined settlement boundary, development proposals will be supported provided they constitute infill or the redevelopment of previously developed land, and outside of the boundary, development will not be appropriate unless specifically supported by other relevant policies as set out in the development plan or national policy. It is therefore unclear why these areas have been included within the settlement boundary, particularly those identified in the evidence base as being suitable for development. The inclusion of these areas appears inconsistent with the relevant development plan policies, as development in these locations would not constitute infill development and these areas instead relate more closely to the surrounding countryside. We therefore recommend that the settlement boundary is amended to exclude these areas. If the intention is to support development in these locations, this should be pursued through a clear and transparent policy mechanism, supported by appropriate evidence and justification, such as the allocation of specific sites for development. The council would be happy to work with the parish council should the examiner consider it is necessary to refine the proposed boundaries to ensure that they contain only that land which can be considered part of the built-up area of the settlement and exclude land which is undeveloped or whose use is more closely related to the countryside. We would also be happy to work with the group on allocating sites for development. It should be noted that Vale of White Horse District Council is currently working with South Oxfordshire District Council to prepare a new Local Plan, the Joint Local Plan (JLP), which is currently at examination. The emerging JLP proposes a revised settlement hierarchy, with some settlements changing their position within it. Ardington is currently classified as a Smaller Village in Core Policy 3 of the Vale of White Horse Local Plan Part 1. Core Policy 4	The methodology for defining the settlement boundary for Ardington is described in section 2.3 of the Evidence Base. The position of the settlement boundary considered various factors including the boundary of the Conservation Area, and the proposal was explicitly reviewed and approved by the community through successive consultations conducted under the appropriate Regulations, including the consideration of alternative options. The selected boundary option allowed for some limited infill. In order to address the points raised by VOWHDC, an expanded explanation of the reasons for the variations to the boundary of the Conservation Area will be provided in section 2.3.3 of the Evidence Base. The new JLP mentioned by VOWHDC will be from 2031-2041. The scope of the Local Plan for that period will have to be reconsidered in the context of local government reform and the creation of the
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			of the Plan supports limited infill development within smaller villages. Policy SP2 of the emerging JLP classifies Ardington as a Tier 4 settlement and proposes to limit infill development to settlements within Tiers 1–3 of the new settlement hierarchy. In response to a question submitted by the Inspectors during the initial hearings last year regarding potential conflicts between the JLP and Neighbourhood Plans, the Councils confirmed that, where a settlement boundary exists in a Neighbourhood Plan for a settlement outside of Tiers 1–3, Policy SP2 of the JLP would supersede that boundary once the JLP is adopted. As Ardington will fall outside of these tiers, if the Inspectors accept the Councils' proposed approach, the settlement boundary would be superseded at that point. Where there is a conflict between a Local Plan and a Neighbourhood Plan, the most recently adopted plan takes precedence, but only in respect of the specific area of conflict. Neighbourhood plan policies that do not conflict with the most up-to-date development plan policies continue to carry weight. The Joint Local Plan does not prohibit Neighbourhood Plans for settlements outside of the settlement hierarchy from being reviewed and updated with evidence to demonstrate that development beyond that planned for in the JLP would be appropriate. However, it is likely that robust evidence would be required to justify a settlement boundary in such circumstances. We would be happy to work with the qualifying body in the future to explore how a review of the plan could respond to the Joint Local Plan, should this be necessary.	Ridgeway Council, which may alter the categorization of settlement Tiers and the development context assigned to them. VOWHDC presents insufficient justification to modify the boundary at Regulation 16. Reconsideration of the boundary would require a repeat of the consultation with the community, which has already expressed a clear view.
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		VDC6 Policy AL2 Ardington Settlement Boundary (Pages 29): We recommend that the policy is restructured to distinguish between the criteria that establishes the principle of development within the settlement boundary, and those that relate to the detailed assessment of development proposals. At present, all criteria are presented as a single list of requirements that proposals must satisfy in order to be supported. This approach risks making the policy unnecessarily rigid. We recommend splitting the policy up as follows to provide a clear distinction between the acceptability of development in principle, and the detailed considerations that should inform the design and assessment of proposals, subject to their scale nature and location: <i>The Neighbourhood Plan defines a settlement boundary for the village of Ardington as shown in red in Figure 8. Development proposals within the settlement boundary will be supported provided that they:</i> <i>a) constitute infill or redevelopment of a previously developed site;</i> <i>b) achieve high-quality design reflecting the recommendations of the Ardington and Lockinge Design Code and the District Councils' Joint Design Guide;</i> <i>c) are in accordance with relevant policies in the Local Development Plan.</i> As appropriate to their scale, nature and location, development proposals within the settlement boundary should: <i>a) reflect the character of the built environment in relation to height, scale and mass of the proposed building, which should be proportionate and sympathetic to the scale of neighbouring buildings;</i> <i>b) conserve the significance of heritage assets and their wider setting;</i> <i>c) do not unacceptably harm the existing amenity of neighbouring properties;</i> <i>d) do not harm the quality of the local environment; and</i> <i>e) take account of the North Wessex Downs National Landscape Management Plan.</i>	Agreed.
		VDC7 Figure 7 Location of Open Countryside (Pages 26): For clarity and accuracy, we recommend including a key within Figure 7 to clearly distinguish between land that falls within the settlement boundary and land that is considered to be open countryside.	Figure 7 is already adequately labelled.

		VDC8	Figure 9: Map of Key Views (Page 35): The view arrows for some of the Key Views appear to extend over land outside of the designated neighbourhood area boundary. As Neighbourhood Plan policies can only apply within the designated neighbourhood area, development proposals outside the neighbourhood area will not be subject to the policies contained within the Plan. As such, these views which look outside or begin outside the neighbourhood area boundary should either be modified so that they are contained within the neighbourhood area or deleted. For clarity and consistency, key views that have been excluded from the evidence base and policy (e.g. Viewpoint 18) should be removed from the map. For clarity and accuracy, we also recommend including a key within Figure 9.	View 19 on the border of the plan area and is the only one which extends significantly beyond the Plan boundary, and it was identified because of that broader span. The map will be adjusted to show that the spot is within the plan area. Even though it is unrepresentative, the scope of View 19 could be modified to stop at the plan boundary. The views that were not prioritized (1, 2, 11, 18) will be highlighted in a different colour in Figure 9. A key will be added to define the colours.
		VDC8a	Policy AL5 Energy Efficiency (Page 33): We recommend including a sentence to account for proposals which would unacceptably affect the significance of heritage assets and/or their settings: <i>Development proposals for energy efficiency and renewable energy measures affecting a designated or non-designated heritage asset, or its setting, should be designed and implemented so as to avoid unacceptable harm to that significance, having regard to the relevant national and local heritage policies.</i>	Agreed.

		VDC9 Policy AL6 Key Views (Page 36): The last sentence of Policy AL6 as currently written refers to development proposals having a “significant adverse impact on an identified important view”. This wording could be interpreted as seeking to prevent any noticeable change within a view, regardless of whether that change would adversely affect the characteristics that make that view important. We recommend that the policy instead focuses on the impact of development on the character and significance of the identified views. This approach would provide greater flexibility for decision-makers to assess the effect of development on the qualities that contribute to the importance of a view, whilst continuing to protect valued landscapes’ characteristics: <i>Development proposals which would have a significant adverse impact on the local character of an identified important view (listed above) will not be supported.”</i> <i>We also recommend including a clear reference, with a direct hyperlink, to the location of the justification and photographs for the key views within the policy or supporting text, to ensure it is evident where this information can be found within the appendices.</i> The supporting text and evidence base accompanying the Neighbourhood Plan do not clearly explain what is significant about each of the identified views, or what qualities justify their inclusion. We recommend that further justification is included within section 3.2.7of the Evidence Base to clearly set out the views significance and the characteristics that demonstrate why it is worthy of designation.	The proposed new text for the policy is accepted. Paragraphs 7.1.1-7.1.4 explain the method for selecting the 19 most significant views. The community identified the views in the Evidence Base, and the most significant were selected based on weight of community support for each one. In other words, the community’s subjective choices were placed on an objective scale.
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		VDC10 Policy AL7 Community Spaces and Landmarks (Page 38): We recommend a series of modifications to this policy to bring additional clarification and to ensure it can be applied consistently in decision-making. The phrase “loss of value to the community” is subjective and may be difficult to assess consistently. Additionally, the viability test in the final sentence may not be appropriate for all assets identified, especially those which do not operate as commercial or income-generating facilities. We recommend a modification to better align with the wording found in the Vale of White Horse Local Plan Part 2. We also recommend additional modification to ensure that the policy brings the clarity required by the NPPF: <i>The following facilities and landmarks, as identified on Figure 10, are recognized as important community assets:</i> <i>Neighbourhood Plan recognizes community assets and facilities in the following locations to which public access is permitted by the landowner. These assets are (Figure 10):</i> <i>a) The Allotments, Ardington</i> <i>b) Playing Fields, Ardington</i> <i>c) Community Woodlands, Ardington</i> <i>d) Millennium Stones (in Community Woodlands)</i> <i>e) East Lockinge Allotments</i> <i>f) Parkinsons.me Garden, West Lockinge</i> <i>g) Community Orchard</i> <i>Proposals to improve access to or enhance the use of such spaces will be supported.</i> <i>Development proposals that would result in the loss of an identified community asset will only be supported where it can be demonstrated through appropriate, detailed and robust evidence that</i> <i>1. It would lead to a significant improvement of the asset, or the replacement of the asset with one equally convenient to the local community,</i> <i>2. Where relevant, the asset is no longer economically viable for the established use, or</i> <i>3. The asset is no longer required.</i> <i>Where proposals are developed that involve a recognized community asset, there will be a presumption against any proposals that would lead to a loss of value to the community, unless it can clearly be demonstrated that the operation of the asset, or the ongoing delivery of the community value of the asset, is no longer financially viable.</i>	Agreed.
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		VDC11 Policy AL10 Impact on Leisure Facilities and Policy AL11 Enhancement of Leisure Facilities (Page 46): We recommend combining these two policies together to reduce duplication as they largely cover the same issues. We recommend a series of modifications to this new combined policy to ensure it brings the clarity required by the NPPF by separating it into two sections, one which supports development that enhances existing leisure facilities, and one which resist their loss outside of specific circumstances. It is unclear what is meant by “appropriate locations” or how decision-makers would be expected to respond to this. We recommend a modification to set out that new leisure facilities will be supported where they are located close to the community and do not result in unacceptable harm to the character of the area. We also recommend modifications to better align with the wording found in the Vale of White Horse Local Plan Part 2 and recommend additional modification to ensure that the policy brings the clarity required by the NPPF: <i>Development proposals that enhance, expand or improve the viability of an identified community leisure facility or identified village hub, as set out in paragraphs 8.2.1 and 8.2.2 will be supported. Development proposals for new leisure facilities in locations that are accessible to the local community and do not result in unacceptable harm to the character of the area will be supported, particularly where they enhance the special character of the Conservation Area and/or the North Wessex Downs National Landscape.</i> <i>Development proposals that would result in the loss of an identified leisure facility or identified village hub will only be supported where it can be demonstrated through appropriate, detailed and robust evidence that:</i> <i>1. It would lead to a significant improvement of the asset, or the replacement of the asset with one equally convenient to the local community,</i> <i>2. Where relevant, the asset is no longer economically viable for the established use, or</i> <i>3. The asset is no longer required.</i> All proposals should accord with the other relevant policies of this Neighborhood Plan and the Development Plan. <i>if they either enhance the viability of an existing community leisure facility or identified village hub (see section 8.2.1 and 8.2.2), or if they provide an acceptable replacement, provided they conform to the Land Use Policies (Policies AL1, AL2, and AL3) will not have an unacceptable impact on the local character of an identified important view (Policy AL6). Enhancement of existing leisure facilities or development of new leisure facilities in appropriate locations of the Parish will be encouraged, especially where it enhances the special character of the Conservation Area and/or the NWDNL”</i>	Policy AL10 and AL11 will be kept separate, but modifications will be made to the text to include aspects suggested by VOWHDC. A table is provided separately with the revised form of words for the two policies.
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		VDC12 Policy AL12 Commercial Development (Page 47): We recommend a series of modifications to this policy to ensure it brings the clarity required by the NPPF and can be applied consistently in decision-making. It is unclear what is meant by development being “appropriate to the existing local economy” in criterion a, and how this would be assessed in practice. Additionally, we consider the focus on Use Class E may result in other forms of appropriate commercial development from being excluded. We recommend that the policy instead sets out that new commercial development should be appropriate to the scale and character of the parish. Criterion b requires development to be accessible by non-car modes. Whilst this objective is supported, the policy should recognize the rural nature of the parish and the practical limitations that may affect travel choices in some locations. We recommend that this requirement should be applied proportionately. Criterion e as currently drafted is overly restrictive. Core Policy 43 of the Vale of White Horse Local Plan sets out that development proposals should avoid the best and most versatile agricultural land, unless it is demonstrated to be the most suitable choice from reasonable alternatives. It is unclear why a more restrictive approach which blocks development on these lands would be appropriate. We recommend the policy is modified to follow the approach established in the Local Plan. We recommend modifying the requirement for proposals to “comply with” the Ardington and Lockinge Design Code and the District Council’s Joint Design Guide. The NPPF is clear that design codes are intended to guide and inform the design process rather than operate as inflexible compliance documents. Paragraph 139(a) states that planning authorities should give significant weight to development proposals which “reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes”. The use of the phrase “must comply” risks introducing an unnecessarily rigid approach that is inconsistent with the NPPF’s emphasis on using design codes to guide the design of proposals, whilst allowing sufficient flexibility to respond to the characteristics and constraints of individual sites. We therefore recommend that this wording is replaced by “demonstrate how the proposal responds to” as this would better reflect the role that the NPPF expects design codes to play whilst ensuring the documents remain an important consideration in the design and assessment of development proposals. We also recommend removing the specific reference to paragraph numbers in the NPPF as this document is periodically updated and these references may become outdated during the plan period. We also recommend a series of modifications to bring the clarity required by the NPPF to and to ensure that the policy can be applied consistently during decision making. Our Economic Development Team note the relatively large number of jobs within the parish, the support for the Lockinge Estate within the Neighbourhood Plan and the positive support for businesses and employment, including positive measures to attempt to alleviate concerns around impact of traffic on the local area. On the basis of the above, we recommend the following modifications: <i>Development proposals for employment uses will be supported where they contribute to the diversification and sustainability of the local rural economy and are appropriate to the scale, character and setting of the parish.</i> <i>As appropriate to their scale, nature and location, employment development proposals for employment uses should:</i>	Agreed.
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			a) Provide opportunities be appropriate to the existing local economy, and primarily focused upon providing workspace for existing or new small-scale businesses, including small-scale commercial, office, service and rural enterprise uses in use Class E (commercial, offices and services); b) be located and designed to maximise opportunities for access by walking, cycling and public transport, where practicable sustainably located so that they are accessible by non-car modes; c) avoid adverse impact to conserve and enhance the special qualities of the NWDNL; d) avoid unacceptable harm to heritage/ local biodiversity/key views; e) avoid the unnecessary loss of not be located on the best and most versatile agricultural land (except where it forms part of the conversion of existing buildings); f) not involve the loss of a residential dwelling unless appropriately justified; g) demonstrate how the proposal responds to comply with the Ardington and Lockinge Design Code and the District Councils' Joint Design Guide amenity principles so as not to cause nuisance to adjoining residential properties; h) comply with paragraph 116 of the National Planning Policy Framework to avoid unacceptable impact on highway safety or cause severe cumulative impacts on the road network that could not be mitigated; and i) comply with Policy AL9 to protect dark night skies.	
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		VDC13 Policy AL13 Business in Residential Properties (Page 48): As with the above policy, we recommend modifying the requirement for proposals to “comply with” the Ardington and Lockinge Design Code and the District Council's Joint Design Guide. The use of the phrase “must comply” risks introducing an unnecessarily rigid approach that is inconsistent with the NPPF’s emphasis on using design codes to guide the design of proposals, whilst allowing sufficient flexibility to respond to the characteristics and Constraints of individual sites. We therefore recommend that this wording is replaced by “demonstrate how the proposal responds to” as this would better reflect the role that the NPPF expects design codes to play whilst ensuring the documents remain an important consideration in the design and assessment of development proposals. We also recommend removing the specific reference to paragraph numbers in the NPPF as this document is periodically updated and these references may become outdated during the plan period. We also recommend a series of modifications to bring the clarity required by the NPPF to and to ensure that the Policy can be applied consistently during decision making: <i>Development proposals to extend existing residential properties to create workspaces for businesses will be supported, provided they:</i> <i>a) comply with the relevant Neighbourhood Plan and Development Plan policies;</i> <i>b) demonstrate how the proposal responds to comply with the Ardington and Lockinge Design Code and the District Councils’ Joint Design Guide amenity principles so as not to cause nuisance to adjoining residential properties;</i> <i>c) c) comply with paragraph 116 of the National Planning Policy Framework to avoid unacceptable impact on highway safety or cause severe cumulative impacts on the road network that could not be mitigated.</i>	The existing wording doesn’t use ‘must’, and the proposed wording doesn’t improve the Policy.
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		VDC14 General Comment: There is no specific heritage policy within the plan. However, the Design Code demonstrates a strong focus on heritage matters, including a clear and informative introduction on the settlement history and an overview of its current heritage assets. This usefully highlights key features such as listed buildings and the Ardington and East Lockinge conservation area. Notwithstanding this, it is recommended that the Plan includes a dedicated heritage policy to provide clear and consistent decision-making support. We recommend a new policy based on Policy BS8 in the adopted Beckley and Stowood NDP, with appropriate reference to the Design Code, as detailed below: <i>Policy ALXX Preservation of Heritage</i> <i>The parish's designated historic heritage assets and their settings, both above and below ground, including Listed buildings, scheduled monuments and conservation areas, will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.</i> <i>The effect of a development proposal on the significance of a non-designated heritage asset should be taken into account in determining the planning application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken having regard to the scale of any harm or loss and the significance of the heritage asset. Development proposals should have regard to the Development Plan, the Joint Design Code and the Ardington and Lockinge the Design Code.</i>	The heritage aspects are already covered in Design Code AL.01. It is inappropriate to introduce a completely new policy without consultation with the community.
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		VDC15 Design Code: The District Council welcomes the preparation of a Design Code for Ardington and Lockinge and the document will assist applicants and decision makers in understanding the distinctive qualities of the parish. However, we do have concerns regarding some of the codes within this document. Specifically, throughout the document there is repeated use mandatory wording, such as “must”, in regard to design. Whilst mandatory wording is appropriate in principle where it reflects statutory requirements or other objective planning requirements, or where it relates to requirements which are evidence-based, locally justified and capable of consistent application through the development management process, some of the mandatory requirements within the Design Code relate to matters of architectural preference or detailed design judgement rather than fundamental design requirements. Specific examples of this include CodeAL.01 which sets out that development proposals within the setting of listed buildings “<i>must preserve and enhance the significance of the asset.</i>” This requirement exceeds the expectations established by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that “in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority...shall have regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which It possesses.” Paragraph 202 of the NPPF sets out that heritage assets “should be conserved in a manner appropriate to their significance...”. As there is no requirement for development affecting a listed building to provide enhancement, and no evidence provided as to why a locally bespoke approach would be appropriate, we recommend amending the wording along the following lines: <i>New development within the setting of a listed building, as identified above, should must preserve and enhance the significance of the heritage asset, including its setting, and where appropriate should take opportunities to better reveal or enhance that significance.</i>” We recommend that this document is reviewed and updated to distinguish more clearly between mandatory requirements and guidance. The District Council would be happy to provide the Examiner with a list of all recommended modifications to the Design Code if helpful and would be happy to work with the qualifying body to identify alternative wording. Our Equalities Team also recommend that the Design Code gives further consideration to the provision and integration of play areas and clear wayfinding and recommend considering the Inclusive Mobility Guide.	All uses of ‘must’ in the Design Code were reviewed under Regulation 14 and have now been reviewed again. Five instances of ‘must’ will be changed to ‘should’, including in Code AL01. The 26 remaining uses of ‘must’ in the Design Code are predominantly for mandatory requirements. A table of usage of verbs ‘must’ ‘should’ etc. in the Neighbourhood Plan and the Design Code is provided separately, showing that ‘must’ is used for less than 10% of the verbs, which is not overly restrictive. The children’s play area in Ardington and Public Rights of Way are addressed by the Parish Council outside the context of the Neighbourhood Plan and Design Code.
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		VDC16	General comment: Our Climate and Biodiversity Team note the clear regard for climate change and nature recovery within the Plan and Design Code, with codes which give consideration to low and net zero carbon buildings, electric vehicle charging points, sustainable drainage systems and flood resilience and the conservation of key habitats as key examples	No action needed.
		VDC17	General Comment: Our Infrastructure Implementation and Funding Team have recommended that the qualifying body may wish to build on the work undertaken by developing a prioritized table/list of more specific project proposals which clearly set out the scope of each project, anticipated cost of delivery, identified funding sources, feasibility and an indication of whether the projects are required to be delivered in the short, medium or long term. Producing a list will ensure that, when funding becomes available, the community is ready with an established list of priorities and proposals for the funding to be used on. It is also beneficial for the District Council and other bodies to know which projects have genuine community support and also encourages transparency and fairness. The District Council would be happy to support the qualifying body in undertaking this work.	No development projects are foreseen so no table can be produced.
		VDC18	General comment: Our Equalities Team have recommended that the Plan includes more explicit guidance and protection for the protected characteristics to ensure the community areas are accessible to the public and a priority to design. This could be achieved through the Neighbourhood Plan's Design Code by including specific guidance relating to accessibility, safety and ease of movement for all users. Incorporating such guidance would support the delivery of well-designed places while helping to ensure that equality considerations are embedded in the design process.	Development will only comprise individual houses (infill) proposed by single landowners without the need for generalized accessibility.
8	Oxfordshire County Council	OCC1	Section 2.2 County Policy: Under the 'Council Policy' section, the plan states " <i>OCC is the Minerals and Waste Planning Authority for the plan area</i> ". We recommend that this section be updated to note that OCC is also the Highway Authority for the plan area too. Additionally, we would also recommend referring to the LTCP and the Movement and Place Plan Programme (MAP Plan), specifically the recently adopted Science Vale MAP Plan which this plan falls within.	Agreed.
		OCC2	Policy AL4: While the policy refers to the Vale of White Horse District Council's (VoWHDC) target to achieve a carbon neutral district by 2045, it would also be useful if the plan referred to OCC's Local Transport and Connectivity Plan (LTCP) which also expresses targets of a net zero transport network by 2040. While this policy discusses the target of carbon neutrality with regards to new developments, the mention of carbon neutrality in relation to car parking and the shared net-zero ambitions, would make the LTCP a good point of reference also. Relevant policies from the Science Vale MAP Plan should also be referenced.	Agreed.

		OCC3	Policy AL7: This policy expresses the importance of maintaining community spaces and landscapes. Referral to the adopted Science Vale Movement and Place (MAP) Plan , which the parish of Ardington and Lockinge falls into the boundary of, would be important. The plan discusses the need to uphold key community spaces with the goal of enhancing public realm and creating a sense of place in settlement centres within the MAP Plan area.	'Science Vale' is an unfamiliar reference in Ardington and Lockinge, and a reference to the MAP Plan will need a full explanation of its relevance. This would change the scope and focus of Policy AL7 without meaningful benefit for the Neighbourhood Plan
		OCC4	Glossary: Following reference to the LTCP and <i>Science Vale MAP Plan</i> , if included, we would suggest the inclusion of the two policies into both the 'Glossary' and 'Relevant Policies' section of this Neighbourhood Plan.	LTCP will be included. The Science Vale Map Plan is not relevant (see OCC3).
		OCC5	We suggest the Neighbourhood Plan include a line on the LLFA's Section 19 Flood Investigation reports, ensuring these are checked against any proposed development site. These can be found on the Oxfordshire Flood Toolkit .	Agreed. The Flood Toolkit should be referred to in Section 6, and a comment added that there are no Section 19 reports for the Plan area to date.
		OCC6	The NP makes no reference to groundwater flood risk. Whilst there are no publicly available flood risk maps for groundwater, we may hold further information on this flood risk type and may be able to advise further, including locations or other sources of information. As such flooding from the groundwater source could be included in the NP and if needed linking to the groundwater page on the Flood Toolkit .	Reference will be made in Section 6 that there is no likelihood of groundwater flooding in the settlements in the Plan area.
		OCC7	There is no reference within the document to the Strategic Flood Risk Assessment which is the evidence base for the local plan.	Agreed. See also the response to OCC8.

		OCC8	There are no Flood Risk maps included in the NP and these may aid the reader visualise flood risk hotspots across the area. The NP may benefit from a section on Flood Risk where maps could be included such as the Risk of Flooding from Surface Water (RoFSW), Risk of Flooding from Rivers and Seas (RoFRS) and Historic Flooding maps could be included, highlighting the areas where risk is highest. The Flood Zone map from the Flood Map for Planning could also be included as this contains undefended modelled outlines, or defended where they are greater, alongside records of historic flooding either via the recorded flood outlines or historic flood outlines map. This might be worth checking with the Environment Agency as this is their data.	Section 6 will be expanded to cover flood risk and SFRA, noting that the Plan area includes no flood risk hotspots, and only one area of potential flood risk being at the Ardington Water Mill.
		OCC9	The LPA should assure themselves that the NP meets its own policies.	No action needed. VOWHDC has done that.
		OCC10	The NP could refer more fully to the National Standards for Sustainable Drainage Systems, as well as the OCC Local Standards and Guidance for SuDS, as a signposting exercise for further guidance on the requirements to drain surface water from new developments	No action needed. As per the response to Comment TW3, Design Code AL.SD05 already includes a hierarchy for wastewater storage and disposal.
		OCC11	The Minerals and Waste Policy team requests that reference to the Minerals and Waste Local Plan is deleted from the text as only the Core Strategy is currently part of the development plan. We welcome reference to County Matter Planning.	Agreed.
		OCC12	Policy AL4 – Resource and Access, an additional point should include: development should prioritise active travel, including safe walking and cycling routes connecting settlements and facilities.	Agreed
		OCC13	Policy AL7 – Community Spaces and Landmarks, consider adding a sentence which confirms the health benefits of such spaces e.g. these spaces contribute to physical activity, mental wellbeing, social cohesion, and access to locally grown food.	The health benefits are obvious and don't need to be stated in a Neighbourhood Plan
		OCC14	In the section which includes Policies AL10 and AL11, a simple addition needs to be added to reinforce the health benefits of protecting and improving leisure facilities: facilities play a key role in supporting healthy lifestyles and reducing social isolation.	The health benefits are obvious and don't need to be stated in a Neighbourhood Plan.

		OCC15	Appendix 3: Monitoring and Review Framework: While the targets and indicators are supported, we wish to see the incorporation of some health-specific ones such as those which measure the use of green spaces, walking and cycling uptake, and the retention or improvement of existing community assets	Such health indicators would be too resource-intensive for the Parish to measure.
		OCC16	It is recommended that references to the Digital Infrastructure are strengthened by: • Expanding Policy AL4 to clarify expectations for high-quality, future-proofed digital infrastructure (e.g. Gigabit capable fibre connectivity and 5G Stand Alone mobile connectivity where available) • Recognising digital infrastructure as a key enabler of: rural economic growth, home working and local employment, and sustainable development outcomes • Ensuring that support for any the construction of any new telecommunications infrastructure (particularly for mobile connectivity) is explicitly stated: facilitate early provision of high-quality connectivity, rather than retrofitting • Considering reference to digital infrastructure within supporting text for: employment and business policies, and sustainable development objectives	Policy AL4 is adequate and non-prescriptive. Landowners have facilitated installation and upgrading of digital infrastructure by the relevant service providers.

Changes to Policies AL10 and AL11

Current Neighbourhood Plan Policies	Modified Neighbourhood Plan Policies	VOWHDC Proposed Merged Policy
Policy AL10 – Impact on Leisure Facilities Development proposals will be supported if they either enhance the viability of an existing community leisure facility or identified village hub (see section 8.2.1 and 8.2.2), or if they provide an acceptable replacement, provided they conform to the Land Use Policies (Policies AL1, AL2, and AL3) will not have an unacceptable impact on the local character of an identified important view (Policy AL6).	Policy AL10 – Impact on Identified Leisure Facilities Development proposals will be supported if they either enhance, expand or improve the viability of an existing identified community leisure facility or identified village hub (see section 8.2.1 and 8.2.2). A development proposal that would result in the loss of an identified leisure facility or village hub will only be supported where it can be demonstrated through appropriate, detailed and robust evidence that: 1. the identified facility is no longer economically viable for the established use; or 2. the identified facility is no longer required; or 3. the identified facility is replaced with one equally convenient to the local community, provided it conforms to the Land Use Policies (Policies AL1, AL2, and AL3) and will not have an unacceptable impact on the local character of an identified important view (Policy AL6).	Policy AL10/11 – Impact on Leisure Facilities and Enhancement of Leisure Facilities Development proposals that enhance, expand or improve the viability of an identified community leisure facility or identified village hub, as set out in paragraphs 8.2.1 and 8.2.2 will be supported. Development proposals for new leisure facilities in locations that are accessible to the local community and do not result in unacceptable harm to the character of the area will be supported, particularly where they enhance the special character of the Conservation Area and/or the North Wessex Downs National Landscape. Development proposals that would result in the loss of an identified leisure facility or identified village hub will only be supported where it can be demonstrated through appropriate, detailed and robust evidence that: 1. It would lead to a significant improvement of the asset, or the replacement of the asset with one equally convenient to the local community, 2. Where relevant, the asset is no longer economically viable for the established use, or 3. The asset is no longer required. All proposals should accord with the other relevant policies of this Neighborhood Plan and the Development Plan.
Policy AL11 – Enhancement of Leisure Facilities Enhancement of existing leisure facilities or development of new leisure facilities in appropriate locations of the Parish will be encouraged, especially where it enhances the special character of the Conservation Area and/or the NWDNL.	Policy AL11 – Enhancement of Leisure Facilities Development proposals for enhancement of existing leisure facilities or development of new leisure facilities in appropriate locations of the Parish that are accessible to the local community and do not result in unacceptable harm to the character of the area will be supported will be encouraged, especially particularly where it they enhance the special character of the Conservation Area and/or the NWDNL	

Ardington & Lockinge - Use of Verbs

Policy/ Code	Title of Policy / Code	Must	Should – (sub- clauses)	Could/ Can	Supported (Not)	Required (Not)	Encouraged (Not)
Neighbourhood Plan							
1	Separation of Settlements		2				
2	Ardington Settlement Boundary	1	2				
3	Outside the Ardington Settlement Boundary				1		
4	Resources and Access		1				
5	Thermal Efficiency		1				
6	Key Views		2				
7	Community Spaces and Landmarks				1		
8	Conservation of Key Habitats		1				
9	Dark Night Skies		3				
10	Impact on Leisure Facilities				1		
11	Enhancement of Leisure Facilities						1
12	Commercial Development		1		(1)		
13	Businesses in Residential Properties				1		
	Neighbourhood Plan Total	1	13	-	4 (1)	-	1
Design Code							
01	Heritage	1	2	2			
02	Building Forms		10	1			
03	Materials and Colour Palette	1	4	2			
04	Boundaries and Means of Enclosure		7	2	(2)		
05	Windows, Porches and Doors	1	13		2		
06	Surfacing	1	6	3	(1)	1	(1)
07	Private & Community Amenity Space		10	1		1	
08	Lighting		4	3		2	
SD01	Low and Net Zero Carbon Buildings	4	6			1	1
SD01	Renewable Energy & Passive Solar Gain/Shading		1				1
SD03	Rainwater Usage and Recycling		5	1			
SD04	Watercourses and Bodies of Water		3	1			
SD05	Sustainable Drainage Systems and Flood Resilience	2	4	1	3		
HH01	Front Extensions & Porches		1 (10)				
HH02	Side Extensions		1 (12)				
HH03	Rear Extensions		1 (7)				
HH04	Garages & Outbuildings	1	10		(2)		
HH05	Replacement Dwellings		1 (12)				
IN01	General Principles Infill Sites		1 (6)				
IN02	Siting, Density and Layout		1 (8)				
IN03	Building lines & Setback		1 (5)				
IN04	Services and Utilities	5	7	2			
LS01	General Principles Larger Developments		1 (9)				
LS02	Density & Layout	3	2		(1)		
LS03	Integrating Development into the Landscape	2	6				
LS04	Scale, Height, Massing & Enclosure		5	2			1
LS05	Natural Light Aspect and Privacy	1	5				
LS06	Trees	2					
LS07	Hedgerows	2	3		(1)		
	Design Code Total	26	121 (69)	21	5 (7)	5	3 (1)

