Uffington and Baulking Neighbourhood Plan

CONSULTATION STATEMENT: APPENDIX 5

External Bodies' Comments on 6-week Pre-Submission Plan

Note: References in the **Comments** column reflect the concepts and draft policies of the Plan at the time of the consultation event. References in the **Responses** column refer to the final NP report.

NFA = No Further action required

Date	Organisation	Comments	Response
26Jun18	Oxfordshire County Council	We have reviewed the draft Uffington and Baulking neighbourhood plan and note that no allocations are proposed. You have undertaken your own housing needs assessment and identified a need for 19 additional dwellings to 2031, which you envisage coming forward in accordance with policies drafted. The County Council has no objections to this.	Noted
		Heritage – Archaeology The draft plan does not contain any reference to the historic environment beyond Conservation Areas, Listed Buildings and Scheduled Monuments. We would strongly urge that the historic environment is considered and given due regard within the plan. We would suggest a policy on the following lines. Policy HE – The Historic Environment: 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.	Included within text of section 4.8.6 together with reference to national and Local plan policies
		Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2012).	Non-designated assets included within section 4.8.6 and policy H4

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		Minerals The paragraph on Fuller's Earth (4.2.4 – 2) should be updated as follows: "2. Fuller's earth: around Baulking there are nationally important deposits of Fuller's Earth, a highly absorbent clay used in a range of products. A major extraction operation to the east of the village began in the 1970s but this deposit of Fuller's earth has now been fully exploited and, since 2012, the site has been restored with woodland planting and a large body of water. It is anticipated that Fuller's earth resources in the wider Baulking-Uffington-Fernham area will be are safeguarded in the adopted Oxfordshire Minerals and Waste Local Plan Part 2 1 – Core Strategy (policy M8), when it is published September 2017." Footnote 18 should be updated, as follows: "Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy published adopted 12th September 2017. Part 2 (Site Allocations) out for consultation Feb/Mar 2018 in preparation; adoption expected November 2020." **Car Parking** Policy S2A in section 8.7 states: "All new developments must provide sufficient off-road car parking, integrated into the landscape". Parking provision will need to be in compliance with Oxfordshire County Council's Residential Road Design Guide.	Text and footnotes in section 3.2.4 updated to reflect this advice This advice and references now incorporated in policy S3
22Jun18	Historic England	The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.	Noted

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		We welcome the brief description of the historical development of Uffington and Baulking in sub-sections 2.4 and 5.6. However, we would welcome a slightly fuller description, particularly given the very rich archaeological interest of Uffington parish, perhaps with reference to the Oxfordshire Historic Environment Record and Historic Landscape Character Assessment (to which we return below).	Noted. See below
		We note from paragraph 3.7 that protection of heritage has been identified as a land use planning issue. Is the condition of heritage assets in the parish an issue? Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II listed secular buildings outside London. Has a survey of the condition of grade II buildings in the Plan area been undertaken?	Comment added in section 4.4 including ref to museum repairs
		Has there been any or is there any ongoing loss of character, particularly within the Conservation Areas, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc?	Comment added in section 5.2.1
		We welcome the reference to protecting heritage assets in the Vision, although we would prefer "conserved and enhanced" as being a little more positive and proactive.	
		We also welcome Objective 3, but we suggest that it either be "*to conserve and enhance the built and historic environment of our parishes*" or, preferably, that there be an additional objective: "*To conserve and enhance the historic environment of our parishes and the significance and special interest of the heritage assets therein, both designated and non-designated*". Not all historic features are built, and the National Planning Policy Framework refers to both, with a specific definition of the historic environment, so the terms "*built environment*" and "*historic environment*" are not interchangeable.	NFA. No changes to Vision or Objectives should be made at this stage Main text wording amended to reflect these points where possible
		We note that the list of evidence in paragraph 3.10 is not intended to be complete, but we would hope that the National Heritage List for England, the	

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		Oxfordshire Historic Environment Record and the Oxfordshire Historic Landscape Character Assessment have all been used as evidence.	
		We particularly welcome the production of the Characterisation Study as we consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.	This reference has been made
		We also welcome sub-sections 4.2.2 and 4.2.3. Again, the Oxfordshire Historic Landscape Character Assessment could provide useful information. We welcome the identification of the five scheduled monuments in the Plan area in sub-section 4.3.	Noted
		Did the Landscape Capacity Study referenced in sub-section 4.4 include the historical significance – the "time-depth" - the landscape? Whilst we understand the intent of Policy L1, we suggest that, as a land use policy, it should explain the circumstances in which planning permission will be granted or refused. The National Planning Practice Guidance that "*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications*".	Policy L1 altered to clarify criteria for development approval in context of LCS table 3
		We consider that, particularly given our comment above, it would be useful for the Plan to include a policy to protect important views, although it would need to be based on a clear understanding of what is important in the view and why it is important and be clear as to whether any loss of the view would be unacceptable or if a partial loss might be acceptable.	NFA. Treatment of 'valued views' which are enjoyed by the public has been debated fully in consultations. See text in section 3.5. for current position. Public views are specifically referenced in policy H4
		We welcome the reference to heritage assets and historic landscape features in Policy L2, but heritage assets are more than landscape or visual receptors and understanding the impact on the significance of the assets (i.e. what is	The requirement to carry out an historic impact assessment under certain conditions is now embedded in policy

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		important about them) and the appreciation of that significance is a specialism in its own right which may well require a separate historic impact assessment. We welcome sub-section 5.3 on the Conservation Areas in the Plan area but consider that it would also be helpful to say what their special interest (the reason for designation) is. We welcome the statement that the District Council intends to carry out a full appraisal of the Uffington Conservation Area in the near future with the assistance of the Parish Council; ideally this should be done before the next stage of the Plan is published in order to be able to inform that next stage. An appraisal for the Baulking Conservation Area would also be helpful – perhaps community volunteers could undertake this, using the experience gained assisting the District Council undertake the appraisal for Uffington? The appendix to this letter also contains links to some helpful toolkits and we would be pleased to offer further advice. We welcome sub-section 5.4 on the listed buildings in the Plan area. Is there a list of locally-important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. Have the Oxfordshire Historic Environment Record and Oxfordshire Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance? The National Planning Practice Guidance states "… *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. … In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions".* We welcome Policy H4, although we would like to see scheduled monuments	H4B NFA. At the time of CA designations in the early 70s, an appraisal case is not recorded. Hence the intention to carry out a new appraisal in Uffington. Noted This suggestion regarding the value of non-designated assets has been taken up in the text (section 4.8.6) aiming also to clarify definitions in policy H4A Ref to scheduled monuments included in policy H2C

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		in addition to Conservation Areas and listed buildings. We would like to see requirements in Policy H5 for the change of use of redundant rural buildings to conserve and enhance significance, if listed or within the setting of a listed building or scheduled monument, and to retain features of architectural or historic significance. We welcome Policies D1 and D2 and sub-sections 6.2 and 6.3.as paragraph 58 of the National Planning Policy Framework states "*…neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics*." We consider that the Vale Design Guide and Reference Documents B (Characterisation Study) and E (J. Cooper's study of the character of houses in Uffington), provide the requisite "understanding and evaluation". We welcome the consideration given to Conservation Areas in Policy D5 and to historical assets and their setting in Policy EE4. Finally, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base, perhaps by inputting to the preparation or review of a conservation area appraisal, the preparation of a comprehensive list of locally important buildings and features, or a survey of grade II listed buildings to see if any are at risk from neglect, decay or other threats.	Reference to historical aspects of buildings subject to change of use has been incorporated in H2B Noted
15May18	Sport England	It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.	Sport England policy references included in section 3.8

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25Jun18	Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made. In our review of the Uffington and Baulking Neighbourhood Plan we have a few comments to make: **Objectives**- We would like to remind you of your commitments to the environment as set out in the NPPF and also The Vale of White Horse Local Plan 2031. While the Local Plan covers environmental objectives and policies for the district, environmental objectives at the neighbourhood level are a good opportunity to define local priorities for biodiversity conservation and enhancement, and to think about identifying key habitats, species and opportunities to improve habitat connectivity and green infrastructure. Please consider including the example objectives below which can be tailored to the plan area: ▪ To maintain and enhance biodiversity in the neighbourhood plan area, with a goal towards providing a net gain of biodiversity for all development proposals. ▪ To create, protect, enhance and manage green infrastructure and networks of biodiversity. ▪ To plan for biodiversity at a landscape-scale, and safeguard and enhance connectivity of local ecological networks. **Policies-** Following on from the suggested environmental objectives, we suggest creating a new set of environmental policies. You could add "Environment" amongst the 5 other focus topic areas (Landscape & Heritage; Housing; Design; Economy & Employment; and Sustainability & Infrastructure). We have provided a list of suggestions to include in the policies and linked them to the relevant legislation for ease of reference: ▪ **Net gain of biodiversity**: Please ensure that any development policy in your plan includes wording to ensure "all development results in a biodiversity	NFA on amendments to objectives as cannot be changed at this stage. Policies S1A and B added to strengthen and clarify biodiversity objectives where development takes place and emphasises opportunities for developing and improving wildlife corridors NFA. Focus groups now disbanded

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		net gain for the neighbourhood plan area". All development proposals should maintain and enhance existing on-site biodiversity assets, and provide for wildlife needs on site, where possible. Where appropriate, on-site enhancements such as new roosting features for bats or nesting features for birds should be incorporated into the fabric of development. Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are in Annex A. For further reference please see paragraph 109 of the NPPF, and Sect 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act).	NFA. NP works within those National and Local policies which seek to maintain and enhance biodiversity assets. No obvious need for additional local NP policies
		▪ **Green infrastructure (GI):** Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure. Development proposals required to provide on-site green infrastructure must provide Green Infrastructure management plans, with proposals including funding for the long-term management of the assets. For further reference please see paragraph 114 of the NPPF.	NFA. Plan area is well provided with green space, ranging from the AONB and the downs, 4 allocated Local Green Spaces, the recreation ground and the sports field, allotments, Baulking Green, a generous network of footpaths and bridleways etc
		▪ **Connectivity:** Building on what was touched upon in Policy D3 in the Plan, proposals for development should provide wildlife corridors that allow wildlife to move from one area of habitat to another. Where ecologically relevant, fences and walls are encouraged to incorporate features that allow dispersal of wildlife through areas of green space and gardens. We recommend keeping green space within villages and across developments in order to maintain connectivity of wider ecological networks. Green spaces in built-up areas also help the health and wellbeing of residents. For further reference please see paragraphs 113 and 117 of the NPPF.	See policy S1B described above
		▪ **Brownfield land:** We recommend mentioning favouring developing on brownfield sites over greenfield sites, provided the brownfield land is not of high environmental value. Removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. For further reference please see paragraphs 110 and 111 in the NPPF.	See policy EE2 re use of brownfield land for commercial use. Also policy H2B and section 4.8.4 re use of brownfield land for housing

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		▪ **Priority habitats and species:** Planning policies should promote the preservation, restoration and re-creation of priority habitats, and promote the recovery of priority species populations. Please consult Annex A for guidance on how to find priority species and habitats in the Uffington and Baulking neighbourhood area. For further reference please see paragraph 117 of the NPPF. ▪ **North Wessex Downs AONB:** We note that the southern portion of Uffington parish is within North Wessex Downs AONB. We would like to commend you on your policies ensuring any development proposals in the Plan area will conserve and enhance the natural beauty of the AONB. We guide you towards paragraphs 115 and 116 of the NPPF for further reference on development in AONBs. We would also like to reference Policy L2 by reaffirming that development proposals brought forward for allocated sites are required to have independent LVIA in line with the Guidelines for Landscape and Visual Impact Assessment (V3) May 2013 (or as replaced). ▪ **SSSIs:** We would like to remind you of legal, national and local plan policy protection for the two SSSIs in the neighbourhood plan area (White Horse Hill SSSI and Fernham Meadows SSSI). Please see paragraph 118 of the NPPF, and relevant sections of the Wildlife and Countryside Act 1981, and the Countryside and Rights of Way Act 2000. It might be possible to identify opportunities to buffer or link SSSIs through habitat creation. ▪ As the neighbourhood plan does not allocate any sites for development, we have no specific comment to make on this matter.	Noted Policy L2 requires a Landscape Assessment for all developments and a formal LVIA using latest guidelines for larger developments Noted
1Aug18	Chair Governors, Uffington School	Suggest revised text on intake of children to primary school from catchment area	Revised text incorporated