

Radley Neighbourhood Plan Second Consultation Draft, September 2017

**ANALYSIS OF COMMENTS RECEIVED,
AND RPC'S RESPONSE.**



Policy/ issue	Respondent	Comment	RPC Response
<p>PP1-3 Sites for development</p>	<p>Gardner Planning on behalf of Arnold White Estates</p>	<p>The D2 [December 2017] NP makes no changes to housing allocations: Radley is set to contribute just 25 additional homes to meet its share of District and Oxford needs, when it is a recognised key sustainable settlement in the important Abingdon and Oxford Fringe Sub-Area and part of the Oxford-Milton Keynes-Cambridge Growth Area.</p> <p>There is still no supporting evidence that ‘reasonable alternatives’ have been investigated. There is no adequate explanation of the process which arrived at the identification of the two housing sites of the ‘old coal yard’ and the ‘central allotments’. The Sustainability Appraisal does not consider ‘reasonable alternatives’ to these sites as required, looking only at the ‘Radley Lakes’ environmental improvement proposals, and stating:</p> <p>“5.1.3 More specifically still, this part of the report presents information regarding the consideration of reasonable alternative policy approaches to the Radley Lakes area, in the south of the plan area - see Figures 5.1. Planning for the Radley Lakes area is of central importance to the achievement of RNP objectives (iv) and (v), as discussed further below.</p> <p>“What about other plan issues?</p> <p>“5.1.4 Whilst the plan will set policy to address a range of other thematic issues through development management policy, these policy areas have not been a focus of alternatives appraisal, and hence are not discussed further here, within Part 1 of the report (but are a focus of Part 2).</p> <p>The ‘thematic issues’ are environmental, not land use or site-specific issues. This lack of evidence and examination of reasonable alternatives seems contrary to Government Planning Practice Guidance:</p> <p>PPG 040 Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan.</p> <p>PPG 042 A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. Guidance on assessing sites and on viability [is provided - see PPG].</p> <p>[This is an extract from the full text. More material on the need to identify more housing sites in the area is contained in the introductory sections of Gardner Planning’s evidence].</p>	<p>The planning authority has not identified any need to find sites for additional housing in Radley, either through Part 2 of the Local Plan or the Neighbourhood Plan, and RPC sees no case to allocate more sites through the NP in the absence of such guidance. The Parish Council’s view is that the development already planned under the Local Plan Part 1 is more than enough for the community to absorb.</p> <p>The identification of two small sites where development will be supported is not driven by a concern to provide more housing in the village. The old coal yard has been an eyesore for many years and development may present the only real prospect of getting it improved. The allotment site has potential as a central site for a larger village shop or other community facilities, which might perhaps combined with some housing development.</p> <p>On the need to consider alternatives for development of the old coal yard site, the VWHDC Screening Opinion concluded: “our opinion is that there will be good potential for RPC to develop appropriate policy, in consultation with VoWH District Council and other interested parties (including Historic England), which ensures that significant negative effects are avoided or fully mitigated. On this basis, it does not seem likely that significant effects will result from policy for this site. Equally, it is difficult to envisage any benefit to examining the emerging policy approach, and alternatives, through a formal SEA process”.</p> <p>On the proposal to support possible development of the allotment site, the VWHDC Screening Opinion concluded that: “As this site is located within the built up area, there is a degree of existing policy support for development. As such, the effect of the NP will not be to ‘allocate’ the site, in the strict sense.”</p>
<p>PP1-3 Sites for development</p>	<p>VWHDC</p>	<p>This policy supports development, subject to a set of criteria. Of key concern are the deliverability of the site, deliverability of the policy and Green Belt policy. Recommendation is to reword the policy and supporting text to be in line with the available planning evidence base, to ensure that the Basic Conditions are met.</p>	<p>Agree the principles set out. We consider that the Basic Conditions are met as noted in relation to the individual sites in the Basic Conditions Statement and below.</p>

<p>PP1: Old coal yard site</p>	<p>VWHDC</p>	<p>The site may not be deliverable because of Green Belt policy and other issues, such as contamination. However, a policy that provides support for development from the community, where a planning application will address these and other issues is acceptable. Planning Policy 1 identifies the Old Coal Yard site, which is within Green Belt, as a ‘Smaller Housing Opportunity’ on page 17 and suggests a figure of 20-25 homes between that and the allotments site in the village, which is also identified in the plan. A Basic Condition that neighbourhood plans must meet is “having regard to national policies and advice...it is appropriate to make the plan”. The National Planning Policy Framework (NPPF) sets out Green Belt policy and also the types of development that may be acceptable within Green Belt. Aerial photography shows the majority of the site is concrete flooring bounded by concrete slabs, which would have been used to store coal and other materials. There are concrete slabs partially dividing the site, with some small outbuildings or containers and small piles of material being stored. There appears to be one barn/workshop type building with a corrugated roof to the south of the site. There is a short access road into the site from the east, just to the north of two houses. There are trees to parts of the north-eastern and parts of the southern boundaries of the site. The site is within the Oxford Green Belt. In general terms, Green Belt is intended to keep land permanently open, whilst also allowing some proposals to come forward in ‘very special circumstances’. In those circumstances the potential harm to the Green Belt must be demonstrably outweighed by other considerations. Paragraphs 89 and 90 explain that the local planning authority should regard the construction of new buildings as inappropriate in Green Belt, and where there are exceptions to this. Proposals for new housing is not specifically stated as being an exception. However, it is possible that development may be acceptable where it is the limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. This would need to be demonstrated by robust evidence at the planning application stage, if the neighbourhood plan is not supported by that evidence. Additionally, Thrupp Lane is a Byway Open to All Traffic (BOAT). In the supporting text to Planning Policy 1, the plan does not set out what is meant by ‘satisfactory management of traffic’. In other sections of the neighbourhood plan the closure of Thrupp Lane is proposed and it can be inferred that this is the intention. The deliverability of this requirement is not clear and may impact the deliverability of the policy. Additionally, the views of Oxfordshire County Council (OCC) Highways on this point are not clear. Additionally, the following change is required, if there is evidence: Replace: “the development should accord with a masterplan which minimises any sense of intrusion into the Green Belt” with “Evidence is provided to demonstrate the proposed development is in accordance with local and national policy on Green Belt”.</p>	<p>This site is in Green Belt. RPC is relying on the Local Plan Core Policy 13 exception for ‘the partial or complete redevelopment of previously developed sites’ in indicating support for its development. Some changes to the text have been made to make the intention clearer.</p>
<p>PP1: Old coal yard site</p>	<p>Radley College</p>	<p>The plan proposes, on page 17, the development of the Old Coal Yard. This site is in Green Belt and it would seem that this is at odds with the plan’s statement and general policy to protect Green Belt around Radley Village. It also seems at odds with statements on connectivity.</p>	<p>As a brown field site, this site falls within one of the categories of site where development may be appropriate under Local Plan CP 13 and our own PP.3.</p>
<p>PP1: Old coal yard site</p>	<p>OCC</p>	<p>The draft neighbourhood plan also indicates support for housing on the Old Coal Yard on Thrupp Lane. In respect of transport, it will be necessary to ensure that the site has appropriate access onto the highway and that the traffic generation can be accommodated safely.</p>	<p>PP.1 already contains a condition aimed at ensuring that the traffic consequences are acceptable. The wording however has been amended to make it clearer.</p>

PP2: Central allotment site	VWHDC	Allotments are protected by legislation that is not related to planning. Councils are required to provide allotments if it is considered there is demand and may only develop existing allotments if suitable alternatives can be found.	We are aware of the legislation to protect allotments and have drafted the policy to conform with the legislative requirements.
CA1: central allotments site	VWHDC	This community action may be more useful as supporting text, which will be examined in support of a planning policy, to support PP2. Any community action could be reworded to state the parish council's intention. Recommend including the current CA1 text as supporting text for the policy. Consider a new community action that states: Radley Parish Council will consider the redevelopment of the central allotments site with reference to the relevant neighbourhood plan requirements.	RPC considers that the CA as it stands reflects the action to which it wishes to commit better than the proposed redraft. A sentence has been added to the supporting text to clarify the intention to develop the site only if it will deliver overall benefit to the community.
Sites for development - the case for Radley south	Gardner Planning on behalf of Arnold White Estates	<p>[The full case for Radley South was made in representations to the December 2016 draft.] The sustainability of Radley as a settlement and its suitability for making a meaningful contribution to the housing shortfall, of the Abingdon and Oxford Fringe Sub-Area and the un-met needs of Oxford, has been demonstrated in Section 2 above.</p> <p>Radley is a sustainable settlement with its own station and ready access to Oxford by rail. It is acknowledged in the Cabinet Report (7.8.15) that Radley is one of the “most sustainable larger village” having “excellent public transport links to Oxford, with a railway station”. This was endorsed by the LP Part 1 Inspector: Radley is “a ‘larger’ village with local services, including a station with direct trains to Oxford, Didcot and London”.</p> <p>The merits of Radley South were set out in the D1 Report, and remain entirely valid. The sustainability of Radley, and its ability to contribute to the growth needs of the area, are matters not addressed by the Neighbourhood Plan. The merits of the Radley South site, and the contributions it would make are not recognised: housing needs, including affordable housing; the realisation of the Radley Lakes proposals; the provision of a village hall and recreational hub; improved access to Thrupp Lane.</p>	RPC remains opposed to development on the South Radley site on the grounds set out in line 3 above and because the site is in Green Belt.
Sites for development - the historic environment	Historic England	<p>To reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment we suggest that the plan could provide more information on how Landscape Character and Historic Landscape Character makes an important contribution to the overall historic environment of Radley Parish. Characterisation may also be used to model other aspects, such as change (or constancy), present and past activity levels, and the sensed qualities of place, such as sound and smell.</p> <p>A local characterisation study can help inform location and detailed design of proposed new development, identify possible townscape or landscape improvements and establish a baseline against which to measure change. A local landscape character assessment would also be useful to consider the sensitivity of the landscape to accept change as a matter of principle that should be established before a site is allocated or supported for development and without having included this in your evidence it is still unclear how the principles of identifying sites outlined for development have been reached.</p> <p>However, in its absence we would understand and support further assessment to inform the supported development sites that have been identified with regards to how they will evolve with regards to their exact development area, layout and nature of the proposed development. This further assessment should include potential impacts on the historic environment and can also identify potential sites for the other outcomes sought in the plan such as a new village hall and playing fields and cemetery. It could also lead to a positive landscape strategy to strengthen and enhance the pattern of landscape features which make up the distinct historical/landscape character of the parish and protect and maintain the significance of landscape patterns and features that have been inherited from earlier layers of landscape use.</p>	<p>RPC does not believe there is a need for further assessment work at this stage in relation to the impact of the proposed development sites on the historic environment.</p> <p>Very substantial amounts of work have been undertaken and published by the two strategic site developers to fulfil the Local Plan requirement to prepare a character study which considers the structure and history of the settlement within which the sites are located, the character of the landscape, the streets and spaces and the built form. Work undertaken by RPC would duplicate these studies.</p> <p>For the old coal yard site, Historic England have welcomed the site specific requirements in PP1 which require a conservation management plan agreed with the County Archaeologist before any development is agreed. This will happen if and when a planning application arises. With reference to possible development of the allotment site, there are no implications for the historic landscape nor for archaeological remains given its setting and relatively recent use for landfill. As for commissioning work to look at potential sites for a new village hall and playing fields from a historic environment perspective, no deliverable alternatives to the existing site have been identified.</p>

Sites for development - the natural environment	Natural England	In our review of the Radley Neighbourhood Plan we note that there are designated sites within and near the Neighbourhood Plan area and the Plan does allocate additional sites for development, comprising approximately 20-25 new residential units, on top of the 900 units already proposed through the Local Plan. Sugworth Site of Special Scientific Interest (SSSI), which lies within the Plan area, is designated for its geological interest and none of the developments proposed within the Neighbourhood Plan are likely to impact on its interest features. Culham Brake SSSI, which lies roughly 460m outside of the Plan area, is a small area of willow carr and is seasonally flooded by the Thames. Whilst this designated site is hydrologically linked to the Thames, Policy PP.15 of the Neighbourhood Plan ensures that development will result in no increase in runoff through appropriate use of sustainable drainage systems. Therefore, we do not believe that the development proposed within the plan will result in significant impacts on these designated sites.	Conclusion noted. No new action required.
PP3: Green Belt - supporting text on page 19.	VWHDC	Although the two may coincidentally be broadly the same in practical terms, the 'built-up area' of the village and the Green Belt boundary are different. Therefore it is not appropriate to define the built-up area of the village as the area that is inset from the Green Belt. The plan is unlikely to be in general conformity with the local plan, which does not include boundaries, and therefore is unlikely to meet the Basic Conditions. Recommend deleting the second sentence of the paragraph 'A geographical boundary' on page 19 and any other references to defining a geographical boundary.	Agree that is wrong to treat the built-up area and inset area as synonymous. The comment about the Local Plan not including boundaries is not understood; it includes boundaries of many different kinds. The wording of this para has been revised for greater clarity about our intentions.
PP3: Green Belt	VWHDC	Green Belt is a strategic matter and the extent of the Green Belt is set by national planning policy. Local planning authorities should establish Green Belt boundaries in their Local Plans, which set the framework for Green Belt. Currently Green Belt boundaries cannot be changed or prevented from changing by neighbourhood plan policies. Specifically Core Policy 13: The Oxford Green Belt sets the extent of the Green Belt around Radley, based on The Green Belt Review of 2014. It is recommended that the policy is deleted along with any references in the supporting text.	It is recognised that this policy does not say anything different from the strategic policy set out in Local Plan CP13, but it is nevertheless included in the Plan to underline its great importance at the parish level. The wording has been slightly revised to more closely reflect that in CP 13.

PP4: Housing size and type at larger sites	VWHDC	<p>This policy of the RNP does not seek to deliver allocations for homes. It seeks to ensure that Major Development proposals for homes meet the needs of those living in Radley, neighbouring areas and Oxford City. RNP also seeks to deliver housing to meet the needs of those seeking to move into Radley for jobs in the wider area. The ambition to support the needs of Radley residents and to also support economic growth is recognised. However, this policy is unlikely to be found to be in general conformity with the Local Plan, including for the reasons set out below. The council are developing an approach to delivering the unmet need for Oxford City in the Part 2 plan and this is a matter for examination in public, anticipated to begin later in 2018. Additionally, housing requirements for ‘larger sites’ (with reference to the strategic housing sites) within the neighbourhood area are also set out in this RNP policy – with supporting evidence in an additional paper called Housing Requirements for the Radley Strategic Sites (2016). The Part 1 plan sets out strategic requirements throughout the plan and RNP must be in general conformity with those requirements. Therefore PP4 is unlikely to meet the Basic Conditions. This is because Core Policy 22 adopts a flexible approach to the implementation of housing mix and requires that a mix of dwelling types and sizes are delivered according to the latest SHMA guidelines, unless an alternative approach can be demonstrated. This should be through the Housing Register or where proven to be necessary for viability reasons. The Site Development Templates also require that a suitable mix of housing is delivered in accordance with CP22 and CP24. A change to the policy is recommended to meet the basic conditions by removing those elements that are likely to not be in general conformity with the strategic policies of the local plan, whilst ensuring there is sufficient flexibility in decision making. It is also recommended that those aspects of the policy that repeat the Local Plan need not be included. Additionally, the choice made in the final neighbourhood plan should take account of the latest and up-to-date evidence of housing need and proportionate, yet robust evidence should be provided in support of the final policy. Recommend: Revising the policy wording to say: ‘Developers submitting housing development proposals are encouraged to take account of the evidence of demand from Radley residents and their families.’ Consider preparing a supporting paper demonstrating those requirements that is not solely focussed on the strategic housing sites.</p>	<p>RPC considers that PP4 is in general conformity with Local Plan Core Policy 22. Our reasons are set out in Annex 3 to the Consultation Statement.</p> <p>The draft Local Plan Part 2 clearly states that the Radley development sites will be expected to play a part in meeting Oxford City’s unmet housing needs. This is a local parish circumstance which in our view justifies a refinement to the district-wide CP22. RPC also considers it reasonable that local parish evidence of housing need, as revealed through RPC’s rigorously conducted May 2016 survey, should be taken into account in deciding the housing mix on Radley sites.</p> <p>We emphasise that we are not proposing that these two pieces of local evidence should replace the VWHDC-area SHMA as the principle guideline for housing mix, but simply that they should also be taken into account. Recent development management decisions have confirmed that the VWHDC SHMA guidelines need not be followed rigidly on a site-by-site basis when other evidence points to modest departures.</p> <p>The revised wording proposed by VWHDC is too weak and nebulous to have impact through through the development management process.</p>
PP4: Housing size and type at larger sites	Barton Willmore	<p>Barton Willmore comment in detail on the RPC survey of housing needs and question its relevance to Plan policy; their comments are recorded in a separate document. They also comment on the relevance of the SHMA figures for Oxford City and conclude: “We do not consider the Oxford City SHMA guidelines should be referenced within this policy, nor indeed the NP in general. Policy PP4 should be re worded to reflect the multiple factors which determine the appropriate housing mix for large strategic sites, which includes character of the area, nature of the site, market factors in addition to evidence of need.”</p>	<p>Barton Willmore’s full comments on this issue and RPC’s response are set out in Annex 3a to the Consultation Statement. RPC does not accept their view that RPC’s survey of local housing need and the Oxford City SHMA guidelines should not be referenced in PP4.</p>

<p>PP4: Housing size and type at larger sites</p>	<p>Redrow</p>	<p>Redrow support the principle of using the most up to date evidence on housing needs to guide the mix of size and type of dwellings proposed on new sites. Caution should however be used in rigidly applying the results from the Strategic Housing Market Assessment (SHMA) and local housing need surveys to new developments. The assessments provide snapshots of need which must be balanced by other factors including design, viability and community turnover considerations. For example, providing over 50% of the housing mix as 1 or 2 bedroom dwellings would result in a much higher turnover of the housing stock and lead to problems with community cohesion and integration. The commentary within the latest Oxfordshire SHMA specifically states at Paragraph 7.35, “we do not strongly believe that such prescriptive figures should be included in the plan making process and that the ‘market’ is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time”.</p> <p>The housing mix at the South of Kennington site has been the subject of extensive pre application discussions with officers at the VoWH District Council. We are confident that it strikes the right balance in providing for local housing need and delivering a good quality design that will encourage the residents to establish strong roots with in the existing communities at Kennington and Radley.</p>	<p>RPC welcomes Redrow’s support for the principle of drawing on all relevant evidence in determining the housing size mix at development sites.</p> <p>RPC is not happy with Redrow’s proposed housing mix for the south Kennington site and does not accept its arguments about high turnover households and social cohesion. These arguments are being pursued in the context of the Redrow planning application and do not affect the principle of what is said in PP4.</p>
<p>PP5: Self build</p>	<p>VWHDC</p>	<p>Support for Self-build homes – defined as dwellings built or completed by (or commissioned by) an individual or association of individuals to be occupied as homes by those individuals – is welcomed.</p>	<p>Support noted</p>

<p>Section 4.2: Creating a heart to the village</p>	<p>Barton Willmore</p>	<p>We note that on page 23 of the NP under ‘issues which need addressing’ point v comments that: “there was some enthusiasm within the community to bring more of the facilities together on one site in order to create a stronger ‘heart’ to the village.” We also note that in section 4.4.2 of the NP it is commented that: “... responses revealed considerable support for a way forward which would give Radley village a stronger natural centre, with community facilities grouped together there.”</p> <p>Notwithstanding this, the NP concludes that ‘Radley’s geography does not lend itself to achieving this’. Instead the NP advocates the improvement of the various facilities in their current locations. We consider this to be a key point, as the various facilities within Radley are located sporadically around the village. The geography of Radley has evolved and indeed is not a typical spine road settlement.</p> <p>Notwithstanding this, the church and primary school are located adjacent to each other. We consider that these co-located uses pave the way for the creation of a central ‘heart to the village’. Good cohesion will likely stem from the centrality of services, enabling people to gather in one location. It is considered that there is currently a real opportunity to achieve this goal and desire of the residents. We note that the Parish survey results demonstrate that 75% of those surveyed stated that they would use the village shop ‘more’ or ‘about the same’ if it was moved to the Church Road location.</p> <p>Unfortunately the NP appears to dismiss the idea of the village hall and playing field re-location to a site alongside the church and primary school, by stating that the development would have ‘little prospect of obtaining planning permission’. Pre-application advice, to our knowledge, has never been sought in this regard from the District Council and we would suggest that this point should be tested, before the assertion is made within the NP. We also note that the NP states on page 25: “The May 2016 consultation showed substantial opposition {32% of respondents) to the current Radley College proposal... It is noted that the questionnaire survey results of May 2016 also indicated that 37% of respondents stated that the village hall and playing fields should be moved. This could be regarded as more substantial support, when considered in relation to the above.</p> <p>The NP also comments on page 27 that ‘RPC considers that retaining the facilities on the current site at Gooseacre is the best option currently on offer’. Whilst we are aware that there has been significant discussion on this topic in the past, there is no evidence to suggest that a detailed assessment of the current site, an assessment of future demand pressures on the village hall and playing fields and a detailed assessment of the previously proposed site has ever been conducted by the Parish Council. It is suggested that more transparency is required in relation to this issue and potentially further consideration is required, prior to the adoption of the NP, to ensure any potentially future options are not overlooked.</p>	<p>Barton Willmore make no points that have not been taken into account by RPC in reaching their view on this matter, and no further amendments to this policy are proposed.</p> <p>Their clients, Radley College, are based at the northern edge of the village and hence likely to see more benefits in focussing services at that end of the village. The evidence from our survey is that many residents do not share their view.</p> <p>Barton Willmore have misrepresented some of our survey findings, consciously or otherwise. On shop use, 61% of respondents said that they would use the community shop about the same if it were moved to a location near the primary school, 14% said they would use it more often and 25% said they would use it less. 80% of those who said they would use it less were frequent users as against only 40% of those who would use it more. The move would thus be likely to result in a significant loss of trade for the shop (which is why the Shop Management Committee do not support the proposed move).</p>
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<p>CA.3 Location of Radley village hall and playing field</p>	<p>Radley College</p>	<p>We note the plan makes a positioning statement that the Village Hall and playing fields should remain at Gooseacre. This is despite earlier surveys (conducted separately by the College and by the Neighbourhood Planning Group) showing a majority of those expressing a view, supporting the proposal for a relocation adjacent to an enlarged Primary School, with funding freed up to pay for a new Village Hall.</p> <p>Accordingly, while we are pleased the plan is now open to a possible change of circumstances (“RPC would review this position if there were changed circumstances...”), we are disappointed that it does not show as much flexibility towards this proposal coming forward again at a later date as it could (the requirement for “overwhelming support” being an implausible expectation for change, and not as quantifiable as “majority support”). We note specifically the comment that the Plan considers there would be “little prospect of obtaining planning permission” for the alternate proposal - but query whether advice has been received on this, or whether the point has been tested - given the real possibility we believe of strong support in favour (which addresses the possibility of creating a heart for the village), and the potentially greater funding certainty this would offer.</p> <p>Notwithstanding the above, if the Village Hall remains at Gooseacre, the College would be happy to work with the Parish Council on future plans. It is our view, however, that any increase in Village Hall footprint and parking area (the need for which is recognised) should not be to the detriment of having full sized playing fields for the community.</p>	<p>Views noted but no change in drafting proposed.</p> <p>We re-iterate that 32% of those responding to our May 2016 household survey were opposed to moving the hall and playing fields and 37% were in favour. Of those living in the sub-area closest to the current location, a clear majority (54%) were opposed to the move.</p> <p>The move would involve ‘inappropriate development’ on two separate sites in Green Belt and we do not believe that there are ‘very special circumstances’ to justify this. It would thus conflict with Local Plan CP 13 and our own PP.3. In view of these policy conflicts and the substantial local opposition to the move, RPC Radley is not minded to support it.</p>
<p>PP6: Facilities on NW Radley site. PP7: Facilities on S Kennington site PP9: Primary healthcare</p>	<p>VWHDC</p>	<p>Requirements for strategic sites are set out in the Site Development Templates. Core Policies 8 (Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area), 15 (Spatial Strategy for South East Vale Sub-Area) and 20 (Spatial Strategy for Western Vale Sub-Area) explain that the strategic site allocations will be brought forward through a masterplanning process involving the community, Local Planning Authority and the developer. The Core Policies go on to state that the sites should meet any requirements set out in the Site Development Templates. The Site Development Templates comprise two parts; general requirements (section two) and site specific details (section three). These parts highlight the issues that should be addressed in detail at the planning application stage and should be read together. A masterplanning process will be carried out on the strategic sites. Strategic sites are also required to contribute towards health care and leisure provision, where appropriate, in accordance with the requirements of the IDP.</p>	<p>As noted in the supporting text in the Plan, we are aware of the Local Plan documents referred to here and are proposing nothing which is inconsistent with them. Within the framework set out in the Local Plan documents, these policies aim to ensure that local concerns and priorities are also taken into account in planning for the strategic sites.</p> <p>Local Plan CP 8 requires master planning for the strategic sites where development proposals ‘are in accordance with the Development Plan taken as a whole’, which will of course include the made Neighbourhood Plan. Master planning is subject to the Development Plan and not vice versa. Please see also Annex 3 to the Consultation Statement.</p>
<p>PP6: Facilities on NW Radley site</p>	<p>Barton Willmore</p>	<p>Comments were made previously in relation to this policy, during the initial NP consultation. Whilst we note the policy wording has been amended, we consider that the currently proposed wording in relation to the location of a playground on the North West Radley site is unnecessary and open to subjective interpretation. The location of a playground should be established through an informed masterplanning exercise and addressed as part of the planning application process which is currently underway. Our client confirms that the appropriate provision will be made, however its precise form and location are yet to be determined.</p>	<p>RPC considers that the precise form and location should take account of the wider Radley context and as such it is a proper subject for the NP.</p>
<p>PP.7: Facilities on South Kennington site</p>	<p>Kennington PC</p>	<p>Thank you for the opportunity to comment on The Neighbourhood Plan for Radley. Kennington Parish Council welcomed and supported the proposal for the community room in the South Kennington development, and also the proposed changes to the cycle track.</p>	<p>Support noted.</p>

PP7: Facilities on South Kennington site	Redrow	The policy indicates that the site should provide a playground and land for a shop and community room. The policy within the VoWH Local Plan refers purely to residential use and does not require the provision of retail or community facilities. Redrow's proposals for the site reflect the local consultation responses and include a new play area and public open space, along with the provision of a retail unit in the south west corner of the site closest to Radley village. The proposals do not include a community room, however the Community Infrastructure Levy (CIL) is being introduced from 1 November 2017 and community facilities are included on the Regulation 123 list, which means they are intended to be paid for through CIL.	The facilities referred to in this policy reflect the aspirations of local people and are not in any way inconsistent with strategic policies in the Local Plan. As such, they are a proper subject for the NP. The NP aims to cover facilities required to be financed both through CIL and s 106. The table in Part 5 of the draft Plan sets out which source we expect to apply to which items. In the case of on-site community facilities there appears to be some inconsistency between what VWHDC have said in the Regulation 123 list and what they have said in their concurrent Supplementary Planning Document on developer obligations. Pending any resolution of that we believe it is reasonable to seek developer funding of a community room.
Community facilities	Gardner Planning on behalf of Arnold White Estates	The relocation of the Village Hall and playing field is clearly contentious, and has been an on-going problem since 2008, as recorded on pp 19, 21 of the Draft1 NP. The existing site is owned by Radley College and leased to RPC. Playing fields to the south are on land owned by clients of AWEL. After considering two proposals by owners of the land (Radley College and AWE on behalf of the owners of the playing field) to provide improved facilities, these are rejected in favour of 'retaining the facilities on the current site' (without further detail and without decisive comment on third party land ownership) and to support additional provision outside the village on the North Abingdon site	AWEL and Radley College's proposals are dependent on permission to develop more housing on Geen Belt land and are rejected for those reasons.
PP9: Primary healthcare	Oxfordshire Clinical Commissioning Group	The comments we made back in January 2017 still stand. These were: "Any development over 200 units would impact locally on health service delivery. The CCG would look to provide new facilities or support the existing provision for your area to expand. To support this increase the CCG would look for CIL or Section 106 funding to support this important infrastructure development to ensure the health needs of the local population are met." Please note we are aware of the housing growth in the area and are working closely with both South Oxfordshire and Vale of White Horse District Council's to ensure that the primary health care needs of the existing and new population are high on the planning agenda and in-line with the National Planning Policy Framework.	OCCG's support for new or expanded facilities is welcome.
PP9: Primary healthcare	Barton Willmore	The development of the North West Radley site will make the appropriate contributions in accordance with the Vale's adopted CIL Charging Schedule, Planning Obligations SPD and in consultation with the District Council. No evidence has been provided to advocate and substantiate the need for a new surgery. In the absence of either, the wording of this policy is considered unsubstantiated.	We are not proposing a new surgery but simply sufficient expansion of facilities to meet the extra demand. The evidence from our household survey is that delays in getting appointments are already a major concern which the increase in population is likely to exacerbate. The CCG agree that there is a need for more surgery provision. Whilst the boundary between CIL and s.106 funding of health facilities is not clear-cut, RPC recognise that the wording in the September NP draft is not appropriate now that the CIL regime is in place and it has been amended accordingly.
PP9: Primary healthcare	Redrow	The policy states that the site should either provide land for a new surgery or contribute to new or expanded facilities elsewhere. Redrow are open to the principle of mitigating the impacts of the proposed development through a contribution to primary healthcare. The appropriate level of contribution will be determined through the planning application process.	Noted

CA.8 Primary education	Radley College	The plan comments on page 29 that “Radley College have expressed willingness in principle to contribute towards achieving this, including through use of nearby land in their ownership”. For the avoidance of doubt, we would wish to clarify that the College is committed to supporting the growth of the primary school but, as an independent charity with its own charitable objects, the College’s ability to support this financially is limited and would be a matter for its trustees. However, as an education provider, and with experience of building design and delivery, we would look to play a role together with other relevant stakeholders, including OCC and the Diocese. We would also note that, in the absence of the College’s proposal for the development of Gooseacre being supported, the College has less room for manoeuvre financially beyond meeting its S106 and CIL obligations when the development of Radley North West comes forward.	Noted. This sentence has been deleted.
CA.8 Primary education	OCC	Radley Primary School and Early Years Provision. We acknowledge that our comments on the first draft have been considered and that there have also been comments from Radley Primary School itself. The planning application for the North West Radley development has sharpened the focus on the need to expand the school to 1 form entry and our comments on that application reflect that. It could be that the need for expansion of the school could be more specifically dealt with in the Neighbourhood Plan, for example by a policy indicating support for this.	The support of RPC for expansion of the school is already contained in CA.8. As the CA presses for a high quality solution going beyond the normal requirement, a Community Action is more appropriate than a Planning Policy.
CA.9 Nursery education	OCC	St Swithun’s Primary School and Early Years Provision. We acknowledge that our comments on the first draft have been considered and amendments have been made recognising that St Swithun’s Primary School has been recently expanded to 2 forms of entry and should cater for expected development in Kennington. Community Action 9 is unchanged from the earlier draft (then CA8) that “RPC will press for and support the expansion of nursery facilities at St Swithun’s primary school.” We noted in our earlier comments that the available early years provision in the Kennington and South Hinksey ward currently just meets the need of the local population, but additional capacity would be required to meet additional demand for places created by housing developments. We therefore support this Community Action	Support noted.
CA.9 Nursery education	Radley Primary school	With regard to C9 on page 30 the governors and I are in support of this section being expanded to include the nursery facilities at Radley Primary so that the section reads: C9 Nursery facilities - Radley Parish Council will press for and support the expansion of nursery facilities at St Swithun’s and at Radley Primary School.	Support noted. Support for nursery provision at Radley primary is expressed in CA8. The headings for CA8 and 9 have been changed for greater clarity about their coverage.

<p>PP10 and CA 10: Radley Lakes strategy</p>	<p>VWHDC</p>	<p>Officers appreciate the issues in this area and the vision set out in the neighbourhood plan to tackle them. This policy has generated a significant amount of discussion between the neighbourhood planning group, the County Council and other stakeholders. The landowner has not been party to those discussions directly. In particular, the legal, environmental and planning constraints in this area are significant, as are the limitations of neighbourhood plans in solving them. All of which has been discussed previously.</p> <p>The policy is currently unlikely to meet the basic conditions, including the requirement to have regard to national policy and to be in general conformity with the local plan. Additionally, the legal tests for neighbourhood plans that must be met are significant. The recognition of these constraints and attempt to prepare a neighbourhood plan with them in mind is recognised and understood. The policy is unlikely to meet the basic conditions and the following risks are highlighted:</p> <ul style="list-style-type: none"> • The neighbourhood plan appears to cover a County Matter by proposing development that may prejudice a minerals/quarry permission. • A review of minerals permissions (ROMP) is being carried out by the County Council and the outcome is unknown. • It may be possible to reword the neighbourhood plan to avoid County Matters, but this generates a further, and no less significant, risk that the development being proposed is not compatible with national and Local Green Belt policy. This includes permanent industrial development on a green field site in the Green Belt. • Road infrastructure is considered “not inappropriate” in the Green Belt. The neighbourhood plan should address the evidence base that would be required to demonstrate this was the case. It may be that this could include policy wording to allow this to be addressed at the planning application stage, where evidence would need to be provided. • There is a high-level of uncertainty about the extent of brownfield - or previously developed land - in the Radley Lakes area. • There are restoration conditions attached to the minerals permissions. • Various temporary planning permissions also exist in this area. • There is some uncertainty if the policy can be delivered because the legal tests to close, or ‘downgrade’, a B.O.A.T are significant and this may not be achieved. BOAT legislation is separate to planning legislation. <p>The views of Oxfordshire County Council, as Highways and Minerals authority, are sought. Recommend preparation of a masterplan for the area, which sets out how the area should change. This could be included as a community action. Elements of the draft neighbourhood plan that meet the basic conditions could still be included as policy.</p>	<p>As these comments recognise, a great deal of time, research and discussion has gone into developing this policy, which we consider now meets the Basic Conditions. Our reasoning is set out in a paper attached at Annex 4 to our Consultation Statement.</p>
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<p>PP10 and CA 10: Radley Lakes strategy</p>	<p>OCC</p>	<p>Transport Strategy. The draft neighbourhood plan proposes the creation of a new access from the industrial sites to Audlett Drive. There are many potential issues which would need to be overcome to pursue such a new road, including but not limited to:</p> <ul style="list-style-type: none"> - Acquiring land - Mineral extraction and existing minerals consents - Road adoption - Impacts on other parts of the road network - Land conditions, drainage etc - Green Belt - Flooding noting that much of the area is in Flood Zones 2 and 3 - Funding. <p>The cross-boundary implications have to be fully considered given that the proposed junction of such a road would be on the edge of the Radley Neighbourhood Plan area and impact on Abingdon residents. The County Council does not have funding or the resources to pursue this project. It is considered that the text, for example on pages 40 and 55 will need to be reviewed. The County Council also has concerns that Planning Policy 11, which seeks that development support the achievement of the Radley Roads Strategy, may need revision.</p>	<p>RPC does not underestimate the difficulties in achieving its goals for the Radley Lakes area but considers that setting out its long-term vision is an important and necessary first step.</p> <p>Recognising that the strategy cannot be achieved through planning mechanisms alone, CA 10 commits RPC to take action with landowners and other stakeholders to prepare a masterplan for the area.</p> <p>PP 10 is carefully drafted to support the policy objectives in a way which does not conflict with the Basic Conditions and other legal requirements.</p> <p>Annex 4 to the Consultation Statement addresses OCC concerns and arguments in detail.</p>
<p>PP10 and CA 10: Radley Lakes strategy</p>	<p>OCC</p>	<p>Countryside access. Thrupp Lane is in part a Byway Open to All Traffic (BOAT). While the plan’s ambition to create a safer walking and cycling route along Thrupp Lane could be supported by the County Council in principle, it can only be without prejudice to the requirement for the County Council to assert and protect lawful rights of access for all classes of user on public rights of way. The draft neighbourhood plan suggests closure of Thrupp Lane to vehicular traffic at a point south of the Old Coal Yard. The County Council cannot indicate any support for a proposal to close the BOAT. The outcome of a process to downgrade, close or divert a Byway Open to All Traffic (BOAT) cannot be guaranteed. The process alternatives are:</p> <ul style="list-style-type: none"> - s116/117 of the Highways Act via OCC where the BOAT would be need to be deemed by a Magistrates Court to be unnecessary (where stopping up). Application may also be made to the Magistrates Court to divert the BOAT to a “nearer or more commodious” route. - Where associated with planning, under s257 TCPA via Secretary of State. 	
<p>PP10 and CA 10: Radley Lakes strategy</p>	<p>OCC</p>	<p>Minerals. Revisions have been made to the draft Plan and Planning Policy 10 taking on board some of the County’s comments made earlier. However, we consider that development in this area will be limited as a result of the Green Belt designation and the neighbourhood plan appears to cover a County Matter by proposing development that may prejudice a mineral permission.</p> <p>Parts of the area are subject to a Review of Minerals Permissions (ROMP). The ROMP area refers to the outlined areas shown on the Thrupp Farm and Thrupp Lane drawings below. [See OCC’s original text for these maps, which are not reproduced here.]</p> <p>While Planning Policy 10 recognises the County Matters, it is important that the policy does not include a provision about development that is ‘excluded development’. For comparison, the judgment on the Faringdon Neighbourhood Plan could be referred to, where it was found that the provisions of that Plan complied with the law because the allocation could only take effect after both restoration and aftercare activities at the quarry had been completed. In the case Faringdon, the restoration and aftercare was due in a much shorter timescale, and the site was not in the Green Belt.</p>	

		<p>The outcomes sought in 4.6.2 and Planning Policy 10 refer to the possibility of new access and limited commercial use. There are a number of reasons why the policy will be ineffective at achieving that goal: - The current mineral permissions allow for working of some areas up to 2042, with restoration by 2043 and a five year aftercare condition. This would go well beyond the plan period. Any application for the permanent retention of the industrial uses on the site would affect the restoration of the quarry, and by virtue of Schedule 1 Part 1(h) of the Town and Country Planning Act 1990, would be a County Matter. As a County Matter the development would therefore be excluded under part 61K of the Localism Act 2011. Though there is a possibility of the site being restored earlier if a prohibition notice is made and confirmed it would still have restoration and aftercare conditions.</p> <p>- Some land including the Curtis Yard site is subject to a restoration condition. The National Planning Policy Framework defines previously developed land as specifically excluding “land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures”. Proposals for permanent industrial development would therefore be a departure from the development plan.</p>	
PP10 and CA 10: Radley Lakes strategy	Gardner Planning on behalf of Arnold White Estates	<p>Whilst this is a central proposal there is still no explanation within the NP of ‘delivery’, ‘funding’, or ‘viability’. Also, nor is there still no such explanation for the equally important new access road to Audlett Drive, Abingdon to relieve Thrupp Lane. Clearly, this would be an expensive project and there would be many other calls on funds raised by way of S106 and CIL. However, with only modest housing proposals, that funding would be also modest. Funds derived from the other two strategic sites would surely be directed to Abingdon and Kennington. The important contribution which could be made by an additional housing site at Radley South is not mentioned.</p>	RPC’s proposals for funding are in Part 5 of the Plan. Some s.106 funding for the Radley Lakes strategy has already been secured.
PP10 and CA 10: Radley Lakes strategy	Natural England	We approve of the proposals relating to the enhancement of the Radley Lakes area for biodiversity	Noted. No new action required.

PP10: Radley Lakes	Environment Agency [The EA did not respond to the September consultation but commented on the revised Radley Lakes text in July 2017. The next column sets out comments sent by Clark Gordan, Planning Specialist, Sustainable Places (Thames), EA dated 27 July. The full email chain is with other responses on the website.]	Priscilla, thank you for sending through the revised chapters of the NP and the summary in your e-mail and similarly thank you William for your thoughts on the revisions made to the Plan. I am pleased to say that our concerns with regard to any 'allocation' of the John Curtis site and the proposed new road have been allayed by the revisions. I feel that the changes made indicate that the proposals for these matters are much more 'ambitious' for the NP now, rather than being formal allocations. The policy and accompanying text are now 'general' enough so as to address our previous concerns on these matters. We are pleased that the NP policy (PP.11) [which became PP10 in the September consultation draft] specifically links to the requirements of the of the Local Plan policy covering flood risk (CP42). I agree that should a developer or landowner come forward with proposals for redevelopment of any commercial/industrial areas within the NP area, or with more detailed proposals for a new link road to Audlett Drive, then it will be for them to demonstrate that any proposals are compliant with any Sequential and Exception Test requirements and any other flood risk requirements in national or local policy. Overall then, we are pleased that these changes have been made and we can support the current text without a need for any further flood risk assessment. I hope our position helps you to move forward with the Plan. If you have any further queries, please do not hesitate to contact me.	RPC welcomes this helpful response.
PP10 and CA 10: Radley Lakes strategy	RWE Generation	RWE Generation supports the strategy for the Radley Lakes area set out in the current consultation draft Neighbourhood Plan. The area as a whole is large enough to accommodate a combination of nature conservation and quiet recreation, and we recognise that the greatest benefits will be obtained if the Radley Lakes area is managed in a coordinated way in accordance with an agreed master plan. As we pointed out during our discussion, part of the success of the restoration and aftercare effort so far is down to the protection of the filled lagoon areas from disturbance and in particular keeping dogs out, which is important given the number of ground-nesting birds which use the restored ash lagoons. As the draft Neighbourhood Plan correctly identifies, the key to successful implementation of the proposed strategy is the provision of alternative road access from Audlett Drive, to solve the Thrupp Lane traffic problem and facilitate regularising the existing industrial and commercial land uses for the longer term.	Support noted
PP10 and CA 10: Radley Lakes strategy	RWE Generation	One of the challenges going forward is to control and eliminate the antisocial activities which continues to occur in the area (principally motorbike scrambling, 4 wheel drive vehicle misuse and fly-tipping) which, if they continue uncontrolled, will hinder progress towards achieving the strategy's objectives. While we agree that positive management of the area for quiet recreation in particular will help to discourage by increasing the presence of responsible members of the community, physical obstructions in strategic places can also help, particularly to control 4 wheel drive access and fly-tipping.	This point will be taken into account in implementation
CA11: Roads policy/ Thrupp Lane	VWHDC	Reword the community action. Replace: "the parish council will work with" with "the parish council will approach".	RPC does not see the case for this change.

PP11. Roads	VWHDC	The views of Oxfordshire County Council as the Highways Authority are sought on this matter. We have previously recommended a wider contributions policy is developed and have suggested that Policy 4.5A in Faringdon Neighbourhood Plan is a good example that recently passed examination. Recommend developing a contributions policy, where it can be demonstrated that this meets the Basic Conditions.	RPC considers that requirements for developer contributions can best be understood and assessed when set in the policy context to which each one relates. However, they are also brought together in Part 5 of the Plan on funding, which includes a table showing all policies with financial implications and how we expect to fund them, and sets out the circumstances in which we are looking for a contribution under s.106 or CIL.
PP11. Roads	Highways England	Highways England will continue to work closely with Oxfordshire County Council and partners to establish the deliverability of and to inform the business case to improve the A34 Lodge Hill Junction to provide south facing slips. We have no objection in principle to the proposal, however, it needs to be demonstrated there would not be a detrimental impact to the safe and efficient operation of the A34 from an improved junction.	Noted.
PP11. Roads. South Kennington site policies	Redrow	<p>The policy refers to the Radley Roads Strategy and the supporting text recommends a number of works to Kennington Road that should be provided by the development of the South of Kennington site. There is reference to the preferred strategy from Radley Parish Council being for a new roundabout at the end of Sugworth Lane to access the site. However, the entrance to Sugworth Lane is beyond the site's southern boundary and therefore this option is not possible.</p> <p>A Transport Assessment has been produced in support of the planning application and Redrow are committing to the following highway improvements:</p> <p>Signal controlled pelican/puffin crossing between the existing footpath on the western side of Kennington Road and the Pebble Hill bus stops.</p> <p>Pedestrian and cycle crossing between existing footpath/ cycleway on western side of Kennington Road and upgraded footway/cycleway through the site along the alignment of the existing public right of way.</p> <p>Gateway feature at the entrance to the 30mph zone to slow traffic on Kennington Road approaching from the south.</p> <p>Financial contribution towards the enhancement of the local public transport service.</p> <p>This comprehensive package of improvements will mitigate the impacts of the proposed development and improve the pedestrian, cycle and public transport experience for existing residents.</p>	The transport mitigation requirements for the South Kennington site are currently being discussed in the development management process for the site. RPC's position remains as set out in the draft NP, which allows some flexibility as to the best solutions.
PP11. Roads. Kennington Road	OCC	Kennington Road. The exact locations and type of any required traffic calming or crossings will be assessed as part of the South Kennington planning application	Noted
PP11. Roads. Sugworth Lane	OCC	Sugworth Lane. The County Council will undertake a holistic overview of Sugworth Lane to determine what changes may be required in light of housing growth in the area and the Lodge Hill slip roads project.	Noted. This overview needs to be incorporated into the development management process for the North-West Radley and South Kennington strategic housing sites so developer contributions can be secured.
PP11. Roads. White's Lane/ Foxborough Rd junction	Gardner Planning on behalf of Arnold White Estates	This Report supports all the Draft NP's policies and proposals. The new roundabout junction for Whites Lane, Foxborough Road and Thrupp Lane is especially supported but, again, there is no explanation about delivery/funding etc. Again, the important contribution which could be made by an additional housing site at Radley South is not mentioned.	RPC agree that development on the S Radley site might contribute to an improved junction but that is not sufficient reason to support it.

<p>PP11. Roads. White's Lane/ Foxborough Rd junction</p>	<p>Radley Village Shop</p>	<p>White's Lane/Foxborough Road junction. Like RPC, Radley Village Shop would favour a roundabout as the chosen solution to the redesign of the White's Lane/Foxborough Road junction. We feel a roundabout would make it easier for vehicles going to the shop (customers and deliveries) to enter Foxborough Road to reach the shop than a junction with Foxborough Road as the minor arm (the same applies to their reverse journey by this route). Any improvements to the junction that make it easier and safer for pedestrians and cyclists to enter and leave the Foxborough Road (and thus visit the shop) would be welcome. Whatever design is chosen, we believe it is vital that there is clear signage at the White's Lane/ Foxborough Road junction indicating the route to the centre of Radley and including specific mention of Radley Village Shop. Our passing trade is an important element of the shop's takings and such signage would alert potential customers from outside the village to the shop's existence.</p>	<p>Comments noted</p>
<p>Bus services</p>	<p>OCC</p>	<p>35 Bus Route. All strategic sites in this area will be required to contribute on a per dwelling basis towards increasing the frequency of the bus route through Radley from three to four buses per hour.</p>	<p>Noted</p>
<p>PP12: Cycling and walking [This comment appears under heading 'Roads' but is actually about the cycling and walking strategy.]</p>	<p>Barton Willmore</p>	<p>Whilst no comments are made specific to the policy wording, we note that the supporting text under section 4.8.1 comments on the need to make walking and cycling to the station a more convenient option. In terms of planning, and in relation to the NW Radley site, we consider that this has been achieved via sustainable pedestrian and cycle links from the proposed development to the station. However, we would also note that the parking restraint at the station further encourages the use of walking and cycling links. At the bottom of page 41 we note that, in relation to a suggested cycle link from the North Abingdon site to the centre of the village, the NP states the following: "It has otherwise received broad support, including from the County Council, and in RPC's view has strong planning merits." (our emphasis). From our understanding of the discussions which took place on this issue we would note that, whilst the County Council were keen to explore the issue further, once it was advised by the College that deliverability was not possible due to land constraints, the County Council no longer pursued this option. For clarity, we feel it is important that the chronology is a little more detailed to respect these discussions.</p>	<p>RPC believe the wording is accurate, but accept that the paragraph is unnecessary and have deleted it.</p>
<p>PP12. Cycling and walking. Cycle track from N Abingdon site.</p>	<p>Radley College</p>	<p>We have previously commented on cycle path strategy, and acknowledge that this is a difficult area to build a reasonable fact base on - the Neighbourhood Plan acknowledges in a number of places that "commuter" cyclists tend to favour roads over paths in a number of instances. Specifically, we would comment, in relation to the diagram on page 42 of the plan that, as a result of the approved application for the Abingdon North strategic site, that there will be investment in delivering Paths F and improving Path D, and, as such, we feel that it would be wrong to promote the possibility of Path E. We are pleased the plan acknowledges our previously raised concerns in any event at the deliverability (on a working farm) of path E, but feel now that this should not be included in the plan.</p>	<p>Comments noted. RPC continue to believe that the case for route E is strong, and that it should be included in the Plan alongside the alternative Route F. It is accepted that the landowners prefer Route F, which is now incorporated in the legal agreement for the North Abingdon site, and accordingly it is the route likely to be delivered.</p>
<p>PP12. Cycling and walking. Cycle track from N Abingdon site.</p>	<p>OCC</p>	<p>The County Council has secured the cycle route labelled as 'option F' on map 10 as part of the North Abingdon development mitigation package.</p>	<p>The support of OCC in achieving this is very welcome</p>

PP12. Cycling and walking. Cycle track from south Kennington site	Redrow	<p>The policy refers to the Radley Cycling and Walking Strategy which requires on-site and off-site improvements to cycletracks and footpaths.</p> <p>Redrow are proposing to upgrade the existing footpath that runs through the site to a hard surface footway and cycleway linking Sandford Lane and Kennington Road. Dropped kerbs and signage will also be installed to provide a means of crossing Kennington Road to link with the existing footway and cycleway that runs alongside Kennington Road to Radley. There will also be a new footpath through the woodland area to the north of the site to provide an additional link to Sandford Lane. With CIL in place from November 2017, funds from the development could also be used for improving the strategic cycleways and footpaths as indicated on the Regulation 123 List. These proposed works are considered appropriate in the context of the development of the site and the CIL Regulations.</p>	<p>RPC believe that to mitigate the traffic effects of the South Kennington housing site a cycletrack to the station is required running by the railway line and that the developer should deliver the part of the track which is in the same ownership as the housing site. This position is supported by OCC. These proposals are currently being discussed in the development management process for the South Kennington site, and RPC's position remains as set out in the draft NP. The wording of PP.12 has been amended to clarify that the requirement to fund off-site cycle infrastructure relates to the mitigation of transport impacts and to remove a duplication of wording in respect of cycle storage.</p>
PP12. Cycling and walking. Cycle track from south Kennington site	OCC	<p>The draft neighbourhood plan proposes a realignment of Sustrans Route 5 north of Radley along the western edge of the railway. The County Council is in discussions with the developers of both the South Kennington and North West Radley development sites in order to pursue this.</p>	<p>The support of OCC in seeking this is very welcome.</p>
PP12. Cycling and walking. Path 8	OCC	<p>The draft neighbourhood plan proposes a realignment of White's Road and a change of junction priority with Foxborough Road. The County Council is pursuing necessary changes with the NW Radley housing development. The scheme will include walking and cycle infrastructure improvements including a convenient crossing on White's Road, and improvements to 'Path 8'.</p>	<p>The support of OCC in seeking this is very welcome</p>
PP12. Cycling and walking. Thrupp Lane.	OCC	<p>While the Thrupp Lane route is designated as part of the National Cycle Network, connecting Radley to Abingdon and beyond, other routes between Radley and Abingdon should not be overlooked – particularly via White's Lane, possibly Path 8 and then Audlett Drive or Radley Road. With Radley Road traffic calmed and Audlett Drive benefitting from off-carriageway cycle provision throughout, these routes are important options for journeys to Abingdon from both the existing village and development site. A journey to Abingdon from the White's Lane / Church Road junction is in the region of 2km shorter via White's Lane, Path 8 and Radley Road than the equivalent Sustrans route 5</p>	<p>RPC agree that the Sustrans route along Thrupp Lane is not the best route for most commuter cyclists from Abingdon. It is however important for leisure users going to Radley Lakes and for those using the Sustrans network for longer cross country trips.</p>
PP12. Cycling and walking. Catering for walkers and those with disabilities.	OCC	<p>We consider that the supporting text to policy PP12 (cycling and walking) could note that cycle tracks should also be designed to cater for walkers and users with disabilities too.</p>	<p>The supporting text already says that cycle tracks should be suitable for a range of users including walkers and those on mobility scooters.</p>
PP12. Cycling and walking. Green infrastructure	Natural England	<p>We also recommend that new development contributes to the provision of high quality green infrastructure along pedestrian and cycle routes both within the new development itself, and as a means of integrating new developments with existing green and built infrastructure. This would not only serve to make these routes more attractive, but would also go a small way to improving habitat connectivity within the landscape and facilitating species movement in response to climate change. Policy PP.12, which relates to the improvement of cycling and pedestrian routes, would be a suitable place to include this measure. Please refer to Annex A for examples of green infrastructure which could be included in a new development.</p>	<p>RPC agree with Natural England about the importance of green infrastructure, including corridors, and this reflected in CA.16, which supports Local Plan policy CP45. Walking/cycling routes are only one means of achieving this, and in practice a limited one, and we do not agree that a specific mention in PP.12 is warranted.</p>

PP13: connectivity	VWHDC	Please see comments on strategic sites under PP6 & 7 above. The policy also appears to be overly restricted to strategic sites. Recommend considering how wider development across the neighbourhood area could be encouraged to contribute to meeting the aim of the plan.	This policy is intended to influence the strategic sites. Our reasons for taking the view that NP has a role promoting local priorities for the strategic sites within the Local Plan context are set out in Annex 3 to the Consultation Statement. Whilst no other development of similar size is expected in the NP area over the Plan period, it is accepted that - should it happen - the policy should apply equally and the wording has been broadened accordingly to include all largescale development.
PP13: Connectivity - pedestrian/cycle link from NW Radley site. [These comments appear under the heading 'cycling and walking' but actually relate to the text on 'connectivity'.]	Barton Willmore	<p>Whilst no comments are made specific to the policy wording, we note that the supporting text under section 4.8.1 comments on the need to make walking and cycling to the station a more convenient option. In terms of planning, and in relation to the NW Radley site, we consider that this has been achieved via sustainable pedestrian and cycle links from the proposed development to the station. However, we would also note that the parking restraint at the station further encourages the use of walking and cycling links.</p> <p>At the bottom of page 41 we note that, in relation to a suggested cycle link from the North Abingdon site to the centre of the village, the NP states the following: "It has otherwise received broad support, including from the County Council, and in RPC's view has strong planning merits." (our emphasis).</p> <p>From our understanding of the discussions which took place on this issue we would note that, whilst the County Council were keen to explore the issue further, once it was advised by the College that deliverability was not possible due to land constraints, the County Council no longer pursued this option. For clarity, we feel it is important that the chronology is a little more detailed to respect these discussions.</p>	RPC note that BW are not arguing here with PP13 itself, but at RPC's interpretation of what the text means for the NW Radley strategic site. Our view remains that a pedestrian/ cycle link from the south of the site through to the existing housing is necessary to deliver good connectivity and integrate the communities.

<p>PP13: Connectivity - pedestrian/cycle link from NW Radley site.</p>	<p>Radley College</p>	<p>The plan refers to concerns around Village connectivity. Specifically on page 17, this is referenced with respect to current development plans and also in the separate section on connectivity on page 44.</p> <p>As a general comment, the nature of the Village and the way it has evolved is for it not to have a traditional straight spine road (or high street). Thus, Church Road and Foxborough Road effectively form a crescent or arc trajectory, and are also connected by St James Road. Lower Radley meanwhile is not connected save for via the railway bridge. Furthermore, the separate locations of the Village Hall (as it is at present), the Church and adjacent Primary School, and the Station/Bowyers Arms, effectively form three focal points - with the Village shop differently sited again!</p> <p>If options to relocate any of these key components of a cohesive village are excluded, then the starting point for creating good connectivity is a challenging one. But for residents in much of Radley the distances involved are already far greater than will be delivered in the Radley North West development, given its centrality - indeed having the Church and primary school at one end of this site ensures integration with the Village. While it is reasonable for the Neighbourhood Plan to comment generically on these issues, it is a concern if it goes too far into adopting a position on the planning documents for the Radley North West strategic site. At the date of writing, these are going through the planning process (and the proposed site has followed the set planning parameters). It is reasonable to assume (albeit not certain) that the application will be determined by the Vale before the Neighbourhood Plan is adopted. It would therefore seem unfortunate if the Neighbourhood Plan, as written, then creates contradictions with plans subsequently approved.</p> <p>While suggestions have been made of creating connections between the North West site and other parts of the Village, it is not clear that residents surrounding these possible connections - possibly in cul de sacs - would embrace them, nor that they would be useful, attractive and well-lit passageways. Also, the distance concerned were there to be a connection to Foxborough Road would be quite significant, and therefore potentially unattractive.</p> <p>We therefore feel that specific assertions regarding connectivity between the Radley North West strategic site and the Village should be the preserve of the planning process for this site.</p>	<p>We agree that the layout of the village as it is must be the starting point for consideration of how best to integrate the new development. However, the shortcomings of the current layout in terms of connectivity is no reason to give up on promoting the best possible connections between the new development and the existing housing. This is a very important component of local design and it is in our view right that the NP should seek to tackle it.</p> <p>Our comments on the relationship between the NP and development management processes for the strategic sites are included in Annex 3 to the consultation statement.</p>
<p>PP13: Connectivity</p>	<p>Barton Willmore</p>	<p>In relation to the currently submitted application, Barton Willmore on behalf of Radley College have submitted a detailed response to Radley Parish Council's objection in this regard, as stated above. This was submitted to the District Council on 3rd October, 2017 and was also accompanied by a Technical Note prepared by our client's transport consultants Cole Easdon, which is appended to this letter. We would note as the overarching and most pertinent point, that the allocation for North West Radley does not require the provision of a link to the south of the site.</p> <p>Notwithstanding this, our response demonstrates beyond all reasonable doubt that the need for a southern access from the North West Radley site was never considered a requirement by the District Council and therefore was never discussed. Moreover, the accompanying Technical Note demonstrates that no real and significant benefit would arise from introducing such a link.</p> <p>Whilst we seek not to repeat the comments of our response in this letter, we trust that the response appended will be given due consideration in relation to the Neighbourhood Plan consultation. For the avoidance of doubt the text within section 4.9.1 and 4.9.2 of the NP should be revisited and should not make reference to a southern pedestrian/cycle link from the North West Radley site.</p>	<p>RPC remains committed to seeking the provision of a cycle/ pedestrian link from the south east corner of the North West Radley site to one of the existing residential roads in order to promote connectivity with the existing community. Our comments on Barton Willmore's technical note are on the website.</p> <p>The draft NP text on this matter has not been changed.</p>

PP13: Connectivity - pedestrian/cycle link from NW Radley site.	Radley Village Shop	As expressed in our statement to the consultation by the Vale of White Horse District Council on the recent planning application for the North West Radley strategic site, Radley Village Shop fully supports PP.13 Connectivity and, in particular, the Parish Council's efforts to bring about integration of the North West Radley strategic site with the existing community and village amenities like the shop.	Support noted
PP13: Connectivity. South Kennington site	Redrow	This policy relates to the access to the strategic sites, including South of Kennington. The supporting text indicates a preference for the site to be accessed opposite Sugworth Lane, however as mentioned this is not possible as the site allocation does not extend that far south. The proposed strategy for site access is for two junctions onto Kennington Road, to ensure good connectivity through the development and avoid the creation of a long dead-end road. The access points have been designed by a specialist transport consultant to ensure they are safe and effective. The pedestrian and cycle provision has been outlined under the section above.	The draft NP allows some flexibility on the access to the site and RPC have no difficulty in principle with the approach being proposed by Redrow
PP13: connectivity	Radley Primary school	With regard to section 4.9 'Village Connections and subsection 4.9.2 Outcomes Sought' and the North-West Radley housing site, we ask that the word 'safe' is inserted before 'pedestrian crossing' so that the section reads: There should be vehicle access onto White's Lane, pedestrian/cycle and possibly car access from the north of the site onto Church Road, and pedestrian/cycle access from the south of the site towards the station and pub. There should be a safe pedestrian crossing between the site and the primary school.	RPC completely agrees that the pedestrian crossing should be of the type best suited to securing safe crossing in the particular context of Church Road. RPC will promote ongoing discussion between the developers, the primary school governors, OCC's transport officers and VWHDC planning officers to secure delivery of the safest crossing arrangements in the most suitable location.
PP14: railway station	VWHDC	Please see comments on strategic sites under PP6 & 7 above. The policy also appears to be overly restricted to strategic sites. Recommend considering how wider development across the neighbourhood area could be encouraged to contribute to meeting the aim of the plan.	See response on PP6 & 7 above.
PP14: railway station	Barton Willmore	As discussed previously in this letter, the development of the North West Radley site will make the appropriate contributions in accordance with the Vale's adopted CIL Charging Schedule, Planning Obligations SPD and in consultation with the District Council. The policies within the NP should reflect this, which policy PP.14 does not currently do. Specifically we refer to page 45 of the NP and the bullet point which states the following: "The station is not sufficiently well linked to strategic housing sites by cycle and walking tracks to make cycling/walking a convenient and safe option in preference to the car." This appears to refer to all the strategic housing sites and we would therefore object to this generalisation. As stated above, it is considered that the NW Radley strategic housing site is sufficiently well linked and has been designed to account for these linkages.	PP14 requires developers to contribute to improved facilities at the station to help deal with the increased demand generated and is in our view justified. The view that the developer's current plans for cycle links from the NW Radley site towards the station are adequate (which RPC do not accept) is not relevant to PP.13, which is concerned with facilities at the station.
PP14: railway station	OCC	The draft neighbourhood plan proposes cycle parking improvements at Radley Station. The County Council has met with Great Western Railway (GWR) on site to discuss the potential options, and GWR is currently working up a scheme. The County Council is securing contributions from the major housing development sites in the area specifically for cycle parking at the station.	This action by OCC is very welcome
PP14: railway station	Redrow	This policy requires developers of the strategic sites to contribute to improving facilities at Radley Station, particularly increasing the cycle storage. Redrow are willing to consider making an appropriate contribution towards cycle storage facilities at the station, but would first welcome further discussion on the potential for Network Rail or Great Western Rail to finance.	RPC believe that the developers should finance the additional cycle storage capacity required as a consequence of the strategic sites, especially as cycle/rail use will mitigate the traffic consequences of the developments

PP.15: surface drainage	Thames Water	Thames Water support Policy PP.15. We would however request the deletion of the words in square brackets below in order to ensure the policy remains robust “Development will be permitted where it is demonstrated that surface water drainage will not add to the existing site runoff or cause any adverse impact to neighbouring properties and the surrounding environment. [Unless it can be shown to be unnecessary] 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 towards the landscaping and biodiversity of the sites and provision should be made for their future maintenance.”	Deletion of the words in square brackets would appear to depart from the new policy announced by the Government on 18 December 2014. However the wording has been amended to read ‘unless demonstrated to be inappropriate’ so it reflects more precisely the wording in the new policy.
PP.15: surface drainage	Redrow	A detailed Flood Risk Assessment and Drainage Strategy have been prepared to support the planning application for the South of Kennington site. Together these demonstrate that an appropriate surface water drainage strategy, using SUDS techniques, can be implemented that will ensure run-off rates are no greater than the greenfield rate. The site design includes two attenuation basins that contribute towards the overall landscaping strategy. An appropriate management regime will be put in place for their ongoing maintenance.	This accords in principle with the proposed NP policy
PP16: sewerage	Thames Water	Thames Water support Policy PP.16 and the amendments made following our consultation response earlier this year.	Support noted
PP16: sewerage	Redrow	The Drainage Strategy also provides full details of the foul water drainage solution and has been prepared in consultation with Thames Water.	RPC do not accept that the detail currently provided on sewerage is adequate and understands that consultation with TW is ongoing, but this is not an issue about the NP policy
PP16: sewerage	Barton Willmore	Currently the first sentence of the policy states the following: “Development of the strategic sites will be permitted where it can be demonstrated that adequate sewerage infrastructure capacity exists both on and off the site... “ As the Parish are aware, in relation to the NW Radley site this has been mitigated via the solution proposed by Thames Water. We therefore consider it would be more accurate to also include text such as, ‘or can be mitigated’ for clarification.	The current wording of PP16 has been agreed with Thames Water and should stand. We agree that development should be allowed if adequate mitigation is in place.
PP.17: Historic Environment	Historic England	Following our previous comments made 10/02/2017 we welcome the amendments that have been made to the plan in response to our comments and are pleased to see the introduction of the description of the historic development of the parish in section 14.13.1 and note that it has split into sections on archaeology and listed buildings. We are pleased to see that the local community consider the need to maintain the parish’s scheduled monuments as being important and welcome the introduction of general policy PP17 and the site specific PP1 for the Old Coal yard site, and we note that the SEA finds that the plan will have no significant effect from a heritage perspective.	Welcome noted.
PP.17: Historic Environment	Redrow	Extensive archaeological evaluation work has already taken place at the South of Kennington site which has highlighted the parts of the site with potential archaeological interest and this work has been shared with the County Council Archaeology team. A programme of archaeological investigation and recording would be implemented following approval of the planning application .	This appears consistent with the proposed NP policy

Historic Environment: proposed additional coverage	Historic England	<p>In addition we would also recommend that two additional Community Actions for Lower Radley and Radley College could be included:</p> <p>Lower Radley is a small nucleated settlement characteristic for its range and pattern of listed farmstead and residential buildings and open space associated with the farming heritage of the area. RPC will work together with Radley History Group to undertake a character assessment exercise to further explore the significance of Lower Radley with regards to providing more detailed understanding of its distinctive character.</p> <p>Grade II* Radley Hall (now Radley College) is a successful and thriving private school situated in a former designed estate landscape. RPC will work with Radley College to identify surviving landscape features and ensure the significance and character of the parkland is maintained.</p>	<p>Radley History Club has already undertaken and published important work on Lower Radley's heritage and is about to engage on a project with Radley College to record the history of the College buildings and parkland. RPC warmly supports these initiatives. However, in the interests of keeping the Neighbourhood Plan and follow-up commitments to manageable levels, RPC is concerned to limit the number of Community Actions incorporated in the Plan, concentrating on issues where new action is required that is central to achievement of the Plan's objectives.</p>
CA.16 Natural Environment	Natural England	<p>We note the omission of a standalone Policy relating to the protection and enhancement of biodiversity across the Parish (as opposed to community actions). In particular we wish to highlight the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Whilst 'biodiversity gain' is referred to in the supporting text in Section 4.13 (The Natural and Historic Environment), no such measure is included in Policy and as such may not be enforceable. Please ensure that a development policy within the plan includes wording to ensure that "all development results in a biodiversity net gain for the parish". For instance such a policy would apply to the North-West Radley strategic development, which has the potential to result in the loss of an area of deciduous woodland located within the site boundary, and would ensure that any unavoidable loss of this priority habitat is adequately mitigated or compensated for.</p> <p>Furthermore, we recommend that a Policy is included within the Plan which makes provisions for the following measures detailed in Section 4.13 of the plan:</p> <ul style="list-style-type: none"> - 'Existing hedgerows and tree belts are retained and where possible enhanced in developing the North-West Radley and South Kennington strategic housing sites, and in all other development; - 'Opportunities are taken for the active promotion of Green Infrastructure and biodiversity gain particularly in the Radley Lakes area' 	<p>As explained in the draft NP text, RPC notes that these requirements are already laid down in Local Plan Core Policies 44 (Landscape), 45 (Green infrastructure) and 46 (Conservation and Improvement of Diversity). We do not consider that a NP Planning Policy which simply re-iterated the terms of the Local Plan policies would achieve anything useful. Community Action 16 shows our support through committing RPC to working to ensure these policies are fully respected in all developments in the parish.</p>
Local Green Space designations	Natural England	<p>Local Green Space designations may afford extra protection to open areas valued by members of the community, and can be designated through the neighbourhood plan process. The current plan document states that the 2016 consultation revealed 'great local concern...to safeguard specific small areas of unspoilt nature' and 'other local areas rich in wildlife that are specially valued by local residents'. As such, it may be appropriate to include policies which designate these valued areas as Local Green Spaces. Further information on Local Green Space designation can be found here.</p>	<p>Consideration was given to Local Green Space designation for a couple of sites in the parish but it was concluded that they did not meet the criteria.</p>
Additional natural environment recommendations	Natural England	<p>Further Recommendations</p> <ul style="list-style-type: none"> - Policies related to Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A; - Development sites should be assessed for 'Best and most versatile (BMV) agricultural land' (Grades 1-3a). Policies related to the mapping of land proposed for development should be included in the Plan. Loss of this resource must be avoided. Please see Annex A for further information. 	<p>The measure of biodiversity net gain is covered by the Local Plan policy.</p> <p>The Plan contains no proposals for development of agricultural land other than the sites allocated under the Local Plan.</p>

Landscape, biodiversity and green space	OCC	As noted in our comments on the first draft, we support the attention that is given to landscape, biodiversity and green space issues and welcome the support that is given to the need to actively seek biodiversity gain associated with new development. Our earlier comment noting that Local Wildlife Sites are designated by Thames Valley Environmental Records Centre, not the County Council, was not included in the summary and the error remains on page 33, footnote 1. The reference “by Oxfordshire County Council” should be deleted from the sentence on Local Wildlife Sites because these sites are identified by Thames Valley Environmental Records Centre on behalf of all local authorities in Oxfordshire, not specifically the County Council.	Support noted. Apologies for the continued error on TVERC, which has been corrected in the latest draft
Front cover	VWHDC	<p>A neighbourhood plan must specify the period for which it is to have effect. It is common practice to align the period of a neighbourhood plan with that of the emerging local plan for the area. The Vale of White Horse Local Plan covers the period up to 2031. Recommend including the date for which the plan is to have effect on the front cover and, where applicable, ensure this is consistent throughout the plan.</p> <p>Using common practice, it is recommended to align the period for which the neighbourhood plan is to have effect with the district’s local plan – up to 2031.</p>	Agreed and incorporated in revised draft.
Section 1.4. Local Plan context	Barton Willmore	We are encouraged that reference to opposing the Local Plan proposals have been removed from section 1.4 of the NP. Consequently the tone of the lead in to this section of the NP takes on more positive tone and our client welcomes this change.	In fact, the text still indicates that we expressed opposition to the Local Plan proposals through its preparatory stages.
Section 2.2. Vision and objectives	Radley College	While there are areas of the plan we do not agree with, the College is committed to working with the broader neighbourhood, and residents and communities within it, to ensure good outcomes in the development of Radley Village. As such, we recognise the role the College plays both as a significant landowner and employer. It is important to place on record that we feel our objectives are fully aligned - namely to ensure Radley Village is a thriving and successful village which the community can be proud of, and with the infrastructure to support - and surpass - its needs. At the heart of this, we view the Church, Village Hall and playing fields, station (and other transport links) as well as the Village pub, the Village shop and the College Sports Centre, as component parts of a successful Radley Village. We also support the goals of good design and connectivity, albeit have a different interpretation on the latter, after considering distances and connections in detail, which we comment on below.	Views noted. No amendments called for.

<p>Section 2.2. Vision and objectives</p>	<p>Barton Willmore</p>	<p>We note that the following text has been removed from section 2.2 of the NP: “RPC believes that the proposed new housing could make Radley an even better place to live...” We would like to see this reference to the positive potential of the now adopted housing allocations within the Radley NP area reintroduced.</p> <p>The NW Radley development in particular will create a stronger sense of place to the village and will bring with it, via the Community Infrastructure Levy and Section 106 contributions, much needed improvements to the services and infrastructure within the village. As section 1.4 of the submitted Design and Access Statement details, the development will help redefine the village edge. The current north-western village edge provides a ‘dented interface’ to the countryside, as a result of previous disaggregated development. The proposed development will redefine this edge adjacent to White’s Lane, completing the village enclosure and improving its interface with the countryside. Moreover, financial contributions via CIL which will come forward as a result of the development will improve existing village services, notwithstanding the improved connection already planned as part of the development. Notwithstanding the comments the NP makes in relation to the development, it is considered that the development brings with it significant benefits and it is further considered that these should be noted within the NP, in order to demonstrate positive and proactive planning.</p> <p>We note that in relation to section 3.2 of the NP, the wording has been amended to remove reference to the Local Plan proposals not being in the best interests of the village and this is welcomed by our client. However, the record of the NP’s resistance to the allocation of strategic sites through the various stages of the Local Plan process remains. We question the relevance of this text remaining, and would advocate an approach where by the NP actively seeks to help shape to Radley in line with the Local Plan. We therefore reiterate comments previously made that the current tenor of this section generally does not positively pave the way for successful collaborative working in the future.</p>	<p>RPC does not share many of Barton Willmore’s views about the benefits of their NW Radley site proposals for the wider community, and does not see the draft NP as the right place for a critique of the proposals. RPC’s views on their proposals will be set out in response to their planning applications.</p>
<p>Part 2: Vision and objectives</p>	<p>CEG</p>	<p>CEG fully supports the principle of Neighbourhood Planning, and through discussions with the Parish Council on the outline planning application, have sought to support the Parish Council in addressing matters of local concern and interest.</p> <p>We support the Neighbourhood Plan Vision and related Objectives, and in particular the welcome to be given to the arrival of new local residents. Planned development at North Abingdon will make a significant contribution towards the Vision’s aspiration for improved and expanded social, community and physical infrastructure.</p> <p>The full response goes on to detail the respects in which CEG’s proposals deliver the six objectives set out in the Plan. This can be found on the Radley Village website.</p>	<p>CEG’s general support is welcome, as is their proposed contribution towards a new cycle track towards Radley station and their proposed financial contribution towards delivering the Radley Lake strategy.</p> <p>It is noted, however, that their response to RPC’s representations on housing mix was disappointing, and their proposals fail to provide for the proportion of smaller dwellings that we would like to see.</p>
<p>Part 2: Vision and objectives</p>	<p>OCC</p>	<p>Public Health We note that our earlier comments have been taken on board and support the definition and inclusion of health and well-being within the key objectives and the subsequent interweaving of health and wellbeing considerations throughout the plan</p>	<p>Support noted</p>
<p>Part 5: Funding</p>	<p>Barton Willmore</p>	<p>In line with the above we reaffirm that our client will make the appropriate contributions in accordance with the Vale’s adopted CIL Charging Schedule, Planning Obligations SPD and in consultation with the District Council. For the avoidance of doubt our client has not confirmed to any ‘voluntary contributions’ beyond this. Any exceptions to this would be a matter for Radley College, but their inclusion with the NP (CA.8) is considered premature at this stage.</p>	<p>Noted. This comment has been amended to indicate that: (i) Radley College is required to provide the land for primary school expansion free of charge under the terms of the VWHDC Infrastructure Delivery Plan; (ii) while the College have offered no further contribution to the work at this stage, further financial support would be welcome.</p>

Contributions	Radley College	For the avoidance of doubt, the College will make contributions in line with the requirements of the relevant planning policies. It would not be appropriate for the College to commit to additional contributions, but exceptions would of course be considered on their own merits and should not be assumed.	Noted. There is a very commendable history of the occupants of the College site, including the College themselves, making voluntary financial contributions to the village of which they are part and RPC hope that this will continue.
Suggested health check	VWHDC	Neighbourhood planning is a positive tool for communities to help shape development in their area. The area that Radley Neighbourhood Plan covers is most of the parish of Radley (albeit one strategic housing site was not included in the neighbourhood area but is within the parish), which includes the village of Radley and surrounding land. Oxford Green Belt is a notable planning designation in the neighbourhood area, with the village inset. Seeking independent advice from a suitably qualified professional on whether the neighbourhood plan will meet the Basic Conditions is strongly recommended. Two options that could be considered are to seek the views of an examiner or consultant or to carry out a health check on your plan. A health check gives valuable independent insight into whether a neighbourhood plan is expected to meet the Basic Conditions and helps to inform the final submission plan. Neighbourhood plan health checks are often available from consultants and separately an independent service that was set up by various professional bodies. A health check is still recommended for Radley neighbourhood plan and should inform the decisions taken to prepare final submission plan.	RPC has had detailed discussions over many months with county and district professional officers and have carefully assessed evidence from national guidance, other adopted NPs, Inspectors' Reports, court cases and other sources to ensure that our Plan is Basic Conditions compliant. We have found there is considerable scope for different interpretations of aspects of the requirements, not least because the practice of Neighbourhood Planning is relatively new. For these reasons, we have decided to move straight to independent inspection stage without the further delay and expense of a formal healthcheck. We note further that we have benefitted from the advice offered by Bluestone Planning, commissioned by VWHDC to review our policies immediately prior to submission of this Plan. Their comments and our response are submitted as Annex 2 to the Consultation Statement.
Basic Conditions	VWHDC	Neighbourhood plans must meet the Basic Conditions. All of these can be found in paragraph 65 of national guidance: https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum . One of these states that the "neighbourhood plan must be in general conformity with the strategic policies contained in the development plan". Up to date strategic policies are set out in the local plan, which consists of the recently adopted Local Plan 2031: Part 1 (Part 1 plan) and will be followed by the emerging Local Plan 2031: Part 2 (Part 2 plan). All of the Part 1 plan is considered to be strategic, which will be supplemented by strategic policies in the Part 2 plan. Development management policies will also be set out in the Part 2 plan. More information on the progress and expected timetable for the submission, examination and adoption of the Part 2 plan is set out on our website. A neighbourhood plan cannot prepare policies for areas – including sites – outside of the designated neighbourhood area and must be in general conformity with the requirements for those within it. 'Site requirements' are set out in Core Policy 22 (CP22), CP24 and the general and individual site templates in appendices. All of these are considered to be strategic and cover key matters for each site, with specific reference to evidence base documents, which are all available on our website. Any neighbourhood plan must be in 'general conformity' with those site requirements, unless planning evidence can robustly demonstrate that a more suitable and viable alternative can be required in policy and delivered. It is recommended, as early as possible, to carefully consider how RNP meets the Basic Conditions and why.	RPC is aware of (i) national guidance on neighbourhood Planning, (ii) the contents of the Local Plan 2031 Part 1, (iii) the associated site templates for the strategic sites within Radley Parish and (iv) the content of the VWHDC Infrastructure Delivery Plan as it affects those sites, and has taken all these documents into account in drafting the Neighbourhood Plan. The draft Local Plan Part 2 has also been considered but is not thought to include any strategic policies which impact directly on Radley. For reasons set out in detail in supporting text in the Plan itself, and in the Basic Conditions statement submitted with this Plan, we consider that the draft Plan is in general conformity with strategic policies in the Local Plan, including those which relate to the strategic sites. The relationship between the NP policies and the Local Plan requirements for the strategic sites is further considered in Annex 3 to our Consultation Statement.

Evidence base	VWHDC	<p>A neighbourhood plan should be supported by a proportionate (in the work required) and robust (to withstand scrutiny) planning evidence base.</p> <p>The three core evidence base documents are the Basic Conditions Statement, Consultation Statement and Environmental Report (SEA or SA report). These should be the primary method of demonstrating how RNP meets requirements, to help pass the examination and ensure it can be made part of the development plan. Other evidence base documents may be submitted for examination where they have been prepared and lend support to RNP. The volume of these extra documents should be within reason, so as not to unnecessarily delay examination. It is also worth considering how these evidence base documents are referenced for clarity in the document and to support clarity in decision making. On page 45 of RNP, traffic surveys are referenced with no author, for example.</p> <p>Consider preparing the evidence base documents for the neighbourhood plan, with time to be amended before submission following comments from stakeholders and any health check.</p>	<p>The Environmental Report was published alongside the pre-submission draft NP in September 2017 but no comments were received over the consultation period or subsequently. Early drafts of the BCS and Consultation Statement were sent to Vale officers in advance of the September 2017 formal consultation but again no feedback was received.</p> <p>We are formally submitting three key consultation documents in addition to the three core evidence base documents in support of the Plan. These are two spreadsheets (including this one) recording responses to our two Regulation 14 consultations and a report of our May 2016 consultation. Other documents to which the NP refers are listed in Appendix 2 to the Plan. Links to all the documents listed are provided on our website so that they are readily available if further interrogation of the evidence base is required. Links to most of these documents have been available on the website since before the first pre-submission consultation.</p>
Gas and electricity supply	National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p>	Noted.
Stakeholder engagement	Radley College	<p>We have previously commented on our disappointment at there not being collaborative focus groups with other Village stakeholders. We, however, acknowledge that every effort has been made to ensure that each stakeholder, including the College, has itself had an opportunity to participate bilaterally in the process, and we thank the Neighbourhood Planning Committee for this. We do feel an opportunity may have been missed for this to be more inclusive although are aware of some attempts to address this on specific projects. The College remains ready to engage as appropriate with other stakeholders - bilaterally or multilaterally - on matters raised in the plan.</p>	Noted. RPC believe that the College's earlier comments greatly underestimated the extent of engagement.
Local roads and pavements	Radley resident	<p>Well done. My conclusion is ---- bring on the houses, the village needs the developers cash to upgrade all that is potentially desired !! My personal response is safe passage around the village for children and adults with buggies and mobility aids is of major concern ---eg Foxborough Road. Cars entering Church Road at its narrowest point with children coming and going to school is Unbelievable !</p>	Views noted.