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Dear Radley Parish Council

Radley Neighbourhood Development Plan – Pre-submission Consultation

Thank you for sending us your draft neighbourhood development plan as part of your pre-submission consultation and thank you to those who have given their time to prepare the draft. We are supporting the delivery of good quality neighbourhood plans that pass examination and are based on proportionate and robust evidence. We share the ambition to have a good quality neighbourhood plan made for Radley Parish.

Having seen the full draft plan, we are able to offer guidance under our duty to support neighbourhood plans. The technical guidance contained below is intended as a positive contribution to preparing your neighbourhood plan but should not be interpreted as the District Council's formal view about whether the plan meets the Basic Conditions and relevant legislation.

Yours sincerely,

William Sparling

Senior Planning Policy Officer (Neighbourhood)

Vale of White Horse District Council

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POSITIVE ABOUT DISABLED PEOPLE

INVESTOR IN PEOPLE

<u>Introduction</u>

1. This is the Vale of White Horse District Council's response to the Radley Neighbourhood Plan Pre-submission consultation. It is prepared under our 'duty to support' neighbourhood planning, which is to provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan. Our response is intended to support the delivery of good quality neighbourhood plans, based on proportionate and robust evidence.

2. Following the pre-submission consultation, we will continue to work with Radley Parish Council in supporting them to write a plan that delivers the aims of the wider community and is successful at examination. Our shared desire is to achieve a plan that is successful at examination and can be made. The parish council may wish to consider an independent health check of their plan before final submission to the district council, a service which is offered by some planning consultants.

3. Neighbourhood Plans must contain planning policies relating to the development and use of land. They must meet the Basic Conditions and all other relevant legislation to be made. For clarity, the Basic Conditions are:
   - Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the plan.
   - The making of the plan contributes to the achievement of sustainable development.
   - The making of the plan is in general conformity with the strategic policies contained in the development plan for the area.
   - The making of the plan does not breach and is otherwise compatible with EU obligations.
   - Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan.

4. The guidance below is provided at an officer level and should not be interpreted as the District Council's formal view about whether the plan meets the Basic Conditions and all other relevant legislation. The comments are not comprehensive and the views of the statutory consultees, Oxfordshire County Council, residents and businesses, landowners and any other stakeholders should be taken into account and the plan revised accordingly. Changes may subsequently affect other aspects of the plan and these should be carefully considered.

5. To communicate our response in a simple and positive way, our comments are written in two ways. Firstly, our broad comments on the plan as a whole and secondly more specific comments set out in a table format. The table contains an identification number for each comment, a copy of the relevant segment of plan, our comments, and finally a recommendation where possible.

6. Neighbourhood planning provides a powerful set of tools for communities to shape development in their area and is supported by Vale of White Horse District Council. We recognise the right of parish and town councils to prepare neighbourhood plans that subsequently become part of the development plan for the district. Neighbourhood plans should be based on proportionate and robust evidence and a steer should be sought from people and businesses within the wider area for which they are written.

7. Our aim is to support the creation of neighbourhood plans that pass examination and can be made, by meeting the Basic Conditions and all other relevant legislation. To do so, our support service meets the 'duty to support' requirements and we provide ongoing guidance to all groups preparing a neighbourhood plan. Additionally, each plan is assigned a lead officer within the planning policy team, who acts as a main contact for the plan within the district council.

8. As the responsible authority for SEA in the district, we have put in place measures to screen plans for their SEA requirements. We determine if SEA is required using all information available to us and consult the three statutory bodies on our opinion, before publishing a SEA Statement. This also involves a screening questionnaire, which neighbourhood planning groups must fill out.

Broader comments on the draft plan

9. This section of the response provides broader comments on the pre-submission draft of the Radley Neighbourhood Plan.

10. We recognise the hard work that has gone in to producing the draft neighbourhood plan. It is clear that significant work has been carried out to engage with a wide range of people and local stakeholders, including landowners and developers. We especially recognise the hard work that has gone in to engaging with the wider community through numerous questionnaires and events.

11. We are supporting the preparation of Radley Neighbourhood Plan with written informal officer comments on technical elements of the emerging plan. We have also met with representatives from the neighbourhood planning steering group (a sub-committee of Radley Parish Council) to discuss the neighbourhood plan and make recommendations on technical elements of the draft. We look forward to continuing those discussions.

12. We also recognise the work that has gone in to revising the most recent iterations of the plan in such a short space of time and the significant progress that has been made. Most recently, we have discussed in the plan's emerging policies in detail and some of the supporting text, along with the need to submit certain evidence base documents. This has been to support the group in preparing a successful plan, whilst also understanding and respecting the desires of the wider

community following the community engagement that has been undertaken to date.

13. One of the Basic Conditions that a Neighbourhood Plan must be tested against is whether the making of the plan is compatible with European Union obligations, including requirements under the SEA Directive. The aim of the SEA directive is:

> *"to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment".*

Screening is stage A in Government's six stage approach to SEA for Neighbourhood Plans. If it is determined through Screening that SEA is not required, than plan makers need not concern themselves with subsequent stages of the SEA process.

14. We are currently screening the plan for whether Strategic Environmental Assessment (SEA) is necessary. We are assessing whether there is the potential for the plan's policies to have significant environmental effects. We will be sharing our SEA Screening Opinion with the parish council for comments followed by the statutory bodies. Following their comments we will prepare a SEA Screening Statement with our views. When the Neighbourhood Plan is submitted to the District Council for examination, a full SEA Report or SEA Statement saying that SEA is not required, must be submitted.

15. We recommend that the key documents to support the submission of the Neighbourhood Plan are completed as soon as possible. This is the main way the independent examiner will come to a view on the Neighbourhood Plan. We recognise the extra workload that this generates for volunteers in the short term and the Parish Council's desire to proceed quickly. We are happy to comment on the key documents as they are drafted. During the pre-submission consultation we received a first draft Basic Conditions statement, although we were not specifically asked to comment on the draft at this stage.

16. The key supporting documents are; Basic Conditions Statement (setting out in detail how the plan meets the Basic Conditions); Consultation Statement (setting out in detail how the community and stakeholders have been consulted and how the neighbourhood plan has responded to those comments); SEA statement or a full SEA report.

17. We recommend the structure and content of the plan is edited to avoid repetition, to achieve consistency and clarity, and to support the decision making process. The layout and structure of the draft plan is generally very good and we recognise the recent work to improve the distinction between policy and

community action. The objectives matrix on page 13 is also commended for its clarity.

18. An initial set of recommendations on structure and layout are below that separates; the vision and objectives; a description of the plan's preparation and discussions that have taken place; and the current legal and policy context.

19. We recommend:
    - Section 1.4 'Vision and Objectives' being a standalone section to support clarity in decision making for future planning applications.
    - Section 1.1 'The Legal Context' and the second and third paragraph of Section 1.4 'The Vale of White Horse Local Plan,' are merged to create a 'legal and policy context' section.
    - In doing so, paragraph one of Section 1.4 could be moved to 'Part 3 Developing the Plan'.
    - Section 2.1 'The Purpose of the Neighbourhood Plan' could also be moved to Part 3 because it largely describes why the Parish Council Decided to prepare a neighbourhood plan, or this could become a Foreword.
    - Section 2.3 Treatment of Cross Boundary Matters, which discusses how these matters were considered in the development of the plan, could be moved to Part 3.

20. We recommend including a reference to Local Plan Part 2 (if the detail is known before submission) to compliment the section on Local Plan Part 1.

21. We recommend reducing the amount of description of process in Part 3 and increasing the discussion on what was found out and how this support the plan's preparation including vision, objectives and policy. Part 3 of the plan is already very helpful and shows the process of the plan's development. It demonstrates the hard work that has gone into producing the draft plan. The Parish Council may wish to consider moving some of this finer detail to the consultation statement to reduce the length of the final plan. It would also be preferable to see more detail of what was said or found out, rather than only a description of what was carried out. It is recognised that some of this detail is contained in some of the policy sections.

22. Part 4 contains the neighbourhood plan's policies. The vision, objectives, supporting text and planning policies will be independently examined and these are subject to the Basic Conditions test. Land use policies should be clearly differentiated from Community Actions and any associated supporting text. We welcome the inclusion of the helpful objectives matrix on page 13 to show how the plan's policies flow from the objectives. We also recognise the effort to separate the Planning Policies from Community Actions by numbers and lettering and this is helpful.

23. We recommend that the Community Actions are very clearly distinguished in the document. Any non-planning content must be very clearly distinct from land-use policies. This is a land-use planning document. We recommend that all supporting text in the document directly supports the vision, objectives and subsequently land-use planning policy by providing context and/or justification. Any supporting text relating solely to the inclusion of Community Actions should be deleted or must be separated clearly from that which supports the land-use policies of the document. Community actions and text should move to an appendix, for example.

24. We recommend that the sections called "What the plan aims to achieve" are retitled and reworded and the tense of the text carefully revised. Currently, this could be confusing in the planning application decision making process by seemingly introducing new aims throughout the document. The content as supporting text is good, but could be reworded to provide supporting context or justification, rather than as aims.

25. Clear mapping throughout the plan creates clarity and supports decision making. We recommend:
    - That the basis of all maps are Ordnance Survey and we can advise on suitable scales.
    - Including an overall 'policies map,' which sets out all of the planning proposals in the neighbourhood plan.
    - That all of the maps in the draft neighbourhood plan should be displayed on a full page and clearly labelled with the neighbourhood area boundary, north arrow, scale bar, title, key and policy references.
    - That text supporting the maps should be on the same or an adjacent page.
    - That a more detailed map of the built up area should be included in the appropriate location within the plan.
    - That all appropriate designations should be included on maps, set at an appropriate scale.

We also recommend including;

- Proposed sites for development, community facilities, all historical and environmental designations.
- Each policy proposal should also be clearly mapped.

Radley Lakes Strategy

26. The "Radley Lakes" area has a long and complicated planning history. The plan sets about tackling many of the problems in the area through a combination of planning policy and community actions. We recognise and commend the parish council's ambition to find a planning solution for the area. The plan's vision makes reference to realising "the mixed-use potential for the Radley Lakes area" with an associated objective to achieve "a solution to the access problem which is currently inhibiting the development of the Radley Lakes area to deliver maximum

community benefit". The supporting text provides a good level of detailed justification.

27. The approach of the plan is to reduce traffic along Thrupp Lane by closing the southern section. This would then necessitate a new road link from the industrial estate to either Audlett Drive or Barton Lane. This is a central aspect of the strategy and it is clear from the plan's vision, objectives and supporting text for the section that this is the case. To do so, the plan seeks to provide the JCSL industrial estate with permanent permission if the new road link is delivered – a final option for which is not yet decided, with a number of options still possible.

28. The content of this section is good but would benefit from redrafting to tease out the key issues and the key points of the strategy in land-use terms – ie the delivery of improved access and possible permanent industrial permissions on the JCSL site. The supporting justification should be drafted in such a way that the land-use policies have clear supporting text and justification.

29. We recommend separating the Community Actions and supporting text by including them in an appendix to the plan. It should be clearly recognised in the supporting text that the neighbourhood plan makes an important and significant contribution to the improvement of the 'Radley Lakes' area, through both planning policies and separate community actions. The planning policies can be accompanied, and amplified, by community actions. However, it must be made clear that although linked, planning policies are not relying on community actions to be delivered.

30. At the present time the draft of this section is not clear and should present a final option (which might well be to present a broad solution, with finer details decided upon in the future) and the wording should be carefully selected. The plan should be worded in a way that is clear and concise and not open to wide interpretation about various possibilities.

Vale of White Horse District Council Comments on the Pre-submission (Reg. 14) Draft of Radley Neighbourhood Plan

	Section of Radley Neighbourhood Plan	Comment	Recommendation
1	Title page	The title page must include the period for which the plan applies. This is a requirement.	Include the plan period 2017-2031 on the front cover, as shown in section 1.3 on page 4.
2	Section 1.2: 'With the exception of the central village, which is inset…'	A slight change in wording to create consistency between the local plan's terminology and the neighbourhood plan would be useful. This is to aid clarity in decision making.	We recommend rewording to say: "With the exception of the existing built-up area of Radley Village, which is inset…. And in accordance with the Strategic Policies of the Local Plan…".
3	All of section 1.2:	The description of Radley here would be well supported by a map, although references to maps shown later in the document, are noted.	Please see the recommendation on mapping in paragraph 25 above. We recommend including a map to support the description of Radley Village.
4	Section 1.3 beginning: 'The designated neighbourhood plan area…'	For clarity, the description would be better placed alongside the map of the neighbourhood area. This is for clarity.	Place the description of the neighbourhood area and the relevant map together.
5	Section 1.3: 'The neighbourhood plan covers the period up to 2031 in line with the current VWHDC Local Plan'	The date the plan covers must be on the front cover.	Delete this sentence and include the dates on the front cover.

6	Part 2 – Vision and Objectives	The vision and objectives are excellent. However, this section could be redrafted to make the section more concise. This would provide further clarity in the support of future planning applications and monitoring of the Neighbourhood Development Plan.	We recommend considering how the vision and objectives could be made more concise.
7	Part 4.1 General "This part of the NP sets out formal policies on twelve subject areas of particular importance to the Plan's objectives."	Grouping the plan into fewer themes would help locate the relevant policies quickly. It will also support comprehensive decision making by including similar policies together. Supporting text may also be reduced where there is repetition or overlap. This is a suggestion to help support decision making for future planning applications. The cycling, walking and roads section could be redrafted into a connectivity section, for example.	We recommend considering how the policies could be grouped into fewer sections where possible.
8	Part 4.1 General "3. Policies"	Please see the paragraphs 19 and 20 above. The document will be independently examined, as a whole. The exception to	We recommend rewording this section to include text from the paragraphs above and amending the structure of the plan as recommended in paragraphs 19 and 20 above.

		this is where community actions are clearly distinct from land-use policy.	
9	Part 4.1 General "In a very few instances a Neighbourhood Plan policy partially or wholly repeats what is anyway in the Local Plan".	We recognise the view that a coherent narrative is important. However, the neighbourhood plan should not repeat what is contained in the Local Plan.	We recommend rewording this section for accuracy and deleting anything in the neighbourhood plan that repeats the Local Plan. Suggested wording: "~~In a very few instances a Neighbourhood Plan policy partially or wholly repeats what is anyway in the Local Plan.~~ The neighbourhood plan does not need to repeat what is anyway in the Local Plan. Where necessary, references are made to the relevant sections of the Local Plan to provide a coherent narrative".
10	Part 4.2 Sites for Development	There are a number of sites discussed in the plan which are of importance. They are a combination of strategic allocations in Local Plan Part 1, strategic transport proposals, allocations in the neighbourhood plan for housing development, and potential sites for development introduced through the neighbourhood plan. All of this information can reasonably be included	We recommend including a table (or another available format to provide further clarity) at the beginning of this section setting out the sites of relevance along with their current status and description. We recommend including an adjacent OS map to support this. We also recommend revising the sections supporting text, following these changes, to remove repetition.

		in the neighbourhood plan and our recommendations are for clarity and to help locate relevant information quickly.	
11	4.2.2 What the NP Aims to Achieve Section beginning: "The NP aims to do three things…"	The supporting text should say what the plan's policy does by providing context and supporting justification, rather than what it aims to do and this should be of direct relevance to the section.	We recommend rewording this section to provide detailed context and justification.
12	Map 3 Sites and Opportunities for Development	This map is very helpful.	Please see recommendation on mapping, as detailed in paragraph 25 above.
13	4.2.3 Policies Section beginning: "PP. 1Development on the Old Coal..."	Each planning policy should be clearly titled.	We recommend including the following title for the policy: "Old Coal Yard Site to the West of Thrupp Lane".
14	4.2.3 Policies Section beginning: "PP.1 Development on the Old Coal..."	The planning policy is supportive of development in the Green Belt. Given the local plan's policies, which are correctly highlighted in the document, it is not clear whether this can be delivered. The plan supports housing development on a site of an Old Coal Yard, which is relatively open. It is	We recommend revising this policy wording based on the responses of landowners, County and statutory consultees.

		recognised that the policy includes the possibility of a masterplan to avoid intrusion into the Green Belt. The policy also says that this site should deliver improvements to Thrupp Lane. Careful consideration should be given to the justification of this policy and consultation with relevant stakeholders and landowners. The policy and supporting text as drafted may appear to allocate a housing site in the Green Belt. The neighbourhood plan should be drafted to demonstrate how key constraints have been considered.	
15	4.2.3 Policies (page 16) Section beginning: "PP.2 Development of the current allotments…"	Each planning policy should be clearly titled.	We recommend including the following title for the policy: "Central Allotments Site to the West of the Railway"
	4.2.3 Policies (page 16)	The relationship of this policy with the local plan is very clear and references are made to the relevant Local	We suggest the following example policy wording as a starting point for further discussions:

	"PP.2 Development of the current allotments by the rail bridge will be supported where the following criteria are adequately addressed: Appropriate measures are taken to remedy any contamination or instability from previous land uses and the main sewer under the site is adequately protected; A suitable replacement allotment site is provided by the parish council which is of at least equivalent quality and is located at reasonable convenience to the community; The village community shop is given an option to occupy part of the site".	Plan policies. The parish council may wish to consider introducing flexibility in this policy to secure provision of allotments that would allow this site to be developed in the future. We also recommend including references to the viability of the site, especially regarding the Village Community Shop being allowed to occupy part of the site. Please see NPPF Paragraph 173 as a starting point.	Development on the Central Allotments Site to the West of the Railway will be supported where the following criteria are adequately addressed: • appropriate contamination and stability mitigation measures are completed from previous land uses; • replacement provision of allotments is made, of at least of equivalent quality and where this provision would be located at reasonable convenience to the community; • appropriate developer contributions are made in accordance with Radley Neighbourhood Plan Policy (if applicable); • the Village Community shop is given an option to occupy part of the site.
16	4.2.3 Policies (page 16) Section beginning: "CA. 1 RPC, as owner…"	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from land-use policy. The parish might also wish to consider moving this community action to supporting text for the plan's policies.	We recommend moving this community action (along with any supporting text) to a separate appendix.

17	4.2.3 Policies (page 16) Section beginning: "PP. 3 The Green Belt round Radley…"	Repetition of existing planning policy is unnecessary and should be deleted. This repeats the National Planning Policy Framework and Local Plan policy.	We recommend deleting this policy.
18	4.3 Housing Mix	There is some interesting discussion and information provided in the Context and What the NP Aims to Achieve Sections. The section could be improved by rewording to remove repetition and create clarity between text on the Local Plan, SHMA, Radley survey and the neighbourhood plan.	We recommend redrafting this section to achieve consistency with other policy sections of the plan and to create clarity between text on evidence bases and supporting detail for policies.
19	4.3 Housing Mix 4.3.1 Context "The Oxfordshire Strategic Housing Market Assessment (SHMA) provides an estimate of needs across the Vale, differentiating between market and affordable housing and by size of dwelling".	The SHMA is considered the most up-to-date evidence to support the local plan, and is thus referenced in Policy. It has also been through examination and is now considered robust.	We recommend that the supporting text is updated and a separate paragraph.
	4.3.1 Context The section beginning:	More detail of the findings could be included succinctly here to support decision making.	We recommend including more detail of key findings here.

	"The main findings were:"		
20	4.3 Housing Mix

4.3.2 What the NP Aims to Achieve

Section called:

"Relationship with the Local Plan" | The section could be reworded to include text under this heading. Otherwise it should be deleted. | We recommend redrafting section 4.3 to achieve consistency with the other sections of the plan. |
| 21 | 4.3 Housing Mix and Tenure

PP.4 "The mix of tenure and size on housing sites should take appropriate account of the evidence of demand from Radley residents and their families, and of the guideline figures for housing for the older people, set out in Housing Requirements for the Radley Strategic Sites, September 2016"

PP. 5 "The provision of plots for self-build on the strategic housing sites will be supported" | This section of the neighbourhood plan seeks to deliver housing development with a mix and tenure reflecting the needs of those living in Radley, nearby Kennington and Abingdon and those who may wish to move to the area. The specific need and method of doing so is not identified in the plan. Policies relating to housing supply should also take account of the latest evidence of housing needs. The Strategic Housing Market Assessment (SHMA) is correctly referenced early on and Local Plan policies CP22 and CP24 are quoted. Additionally, a housing needs survey has been carried out | We recommend the following:

• Carefully considering the scope of this section to either broaden the policy to include all of the neighbourhood area and amend the wording of the justification accordingly, or remain focussed on the strategic sites and amend the wording of the justification accordingly (more specific recommendations are below).
• Carefully considering the scope of the supporting text. This will be examined and should provide context and/or justification for the planning policies only.
• Separating planning policy from community action and move the community actions to an appendix.
• We recommend considering the scope of this policy in more detail to deliver the plan's desired aims for this section. |

to identify some need for Radley. The justification highlights the importance of mobile homes in Radley and a community action covers these sites. The planning policy only covers the strategic sites in the neighbourhood area. The policy PP.4 is relatively narrow in its focus. The policy confusingly focuses on both "housing sites" and "Radley Strategic Sites". Clarity is required on whether the policy is attempting to cover all housing development in the neighbourhood area, specific sites, or only the strategic sites. Given that the aims of the plan are relatively wide and opportunities for development on various sites are highlighted in the plan there is also an opportunity to create policy covering not only the strategic sites, but housing requirements for the neighbourhood area. The parish council may also wish to expand this policy to cover	A recent example from a neighbourhood plan with similar aims and that passed examination is included below. This policy is however broader in scope than the current Radley draft. *Proposals for housing development should be in accordance with the character of the areas and to meet the needs of current and future households in <town> including home workers. Proposals for housing development incorporating ==bungalows== and opportunities for ==self-build== schemes will be encouraged provided they accord with the design principles of the Development Plan.*

		character, scale and design (see the Design Guide SPD) subject to appropriate wording and suitable evidence to meet their aims. The plan's policy should also consider viability, or be worded in such a way as to be flexible, rather than restrictive. A reference to Local Plan Part 2 or the emerging housing strategy could be considered for inclusion in the justification.	
22	4.3.3 Policies PP. 4	Each planning policy should be clearly titled.	We recommend including the following title for the policy: "Housing Type, Tenure and Mix"
23	4.3.3 Policies PP.5	This policy, supporting self-build plots could be incorporated into a broader policy covering housing in the neighbourhood area. The focus is currently restrictive to the strategic housing sites and the parish council could consider widening the remit of this policy. This would support the plans objectives and need highlighted in the supporting text. Please see	We recommend the following example text: "The provision of plots for self-build will be supported".

		the recommendation for PP. 4 above.	
24	4.3.3 Policies CA.2	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.
25	4.4 Community Facilities 4.4.1 Context Section called: Existing Facilities		We recommend this description closely accompanying Map 4.
26	4.4 Community Facilities 4.4.1 Context Section called: Existing Facilities and Map 4	This map is very helpful in locating the facilities in Radley.	We recommend including this as a OS map.
27	4.4 Community Facilities 4.4.3 Policies and Community Actions	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy. Planning policies and community actions (and their respective	We recommend separating planning policy and their supporting text from Community Actions and supporting text. Community actions should be included in a separate appendix. We recommend clear titles for each planning policy and community action.

		supporting text) should be separated and clearly titled. Community actions should be in a separate appendix.	
28	4.4 Community Facilities 4.4.3 Policies	We commend the neighbourhood plan's attempt to plan for better community facilities in Radley. Considering what the plan seeks to deliver, we feel that a broader policy would best placed to deliver the plan's aims. CA.3-PP.8 could all be replaced by this type of policy.	We recommend carefully considering the aims of the section and expanding the scope of the policy and supporting text to achieve the plan's aims. We recommend the neighbourhood plan clearly defines a list of community facilities. We recommend carefully considering the deliverability of community facilities in relation to the viability of housing sites. We welcome the opportunity to discuss this further.
29	4.4 Community Facilities 4.4.3 Policies PP. 9	This can reasonably be included if the policy gives sufficient flexibility when subject to the 'material considerations' test. To be included this text should be supported by a clear planning justification about continuity and importance of availability of facilities in the supporting text.	We recommend including planning justification to support this policy. We recommend rewording the policy. We welcome further discussions on this policy.

30	4.5 Primary Education and Healthcare 4.5.3 Policies CA. 7 and CA.8	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix. We recommend clear titles for each.
31	4.5.3 Policies PP. 10	To better meet the aims of this section, this policy could be delivered through a developer contributions type policy.	We recommend moving this policy to a 'developer contributions' policy along with other community facilities. We recommend incorporating the supporting text with the community facilities section.
32	4.6 Radley Lakes Area 4.6.1 Context		We recommend including a detailed OS map of the key features of the area, alongside this section.
33	4.6 Radley Lakes Area 4.6.1 Context		We recommend including a detailed OS map of the key sites and designations alongside this section.
34	4.6.2 What the neighbourhood plan aims to achieve Section called: Other industrial and commercial uses "…and largely unlawful way".		We recommend deleting this wording.
	4.6.3 Policies CA.7	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate and coloured box following the planning policy.

35	4.6 Radley Lakes Area 4.6.3 Policies PP. 11	The neighbourhood plan cannot set a presumption against development because it is contrary to the NPPF and LPP1. We suggest that this policy will fail the Basic Conditions. The references to enforcement action should be deleted because it is not a land-use policy.	We recommend deleting this policy because it does not meet the Basic Conditions.
36	4.6.3 Policies Section beginning: "PP. 12	This policy is supportive of permanent industrial and commercial development, if a satisfactory access route is created and where landscaping and screening preserves the character of the adjacent lakes. The plan's ambition is to close the southern section of Thrupp Lane and create a new access road to Audlett Drive or Barton Lane. It is not yet clear if this is deliverable and more consideration is needed on evidence or changes to wording. The views of the statutory consultees are also being sought through the SEA process and pre-submission consultation and	We recommend redrafting this policy based on the outcome of SEA Screening. We welcome the opportunity to discuss this further.

		will provide further clarity for future iterations of the plan.	
37	4.7 Roads 4.7.1 Context The section beginning: "The main problems identified in preparation…"		We recommend including a detailed OS map of the key issues of the area, alongside this section.
38	4.7.2 What the Plan Aims to Achieve: A Roads Strategy for Radley		We recommend including a detailed OS map of the key issues of the area, alongside this section.
39	4.7.3 Policies PP.13 "New development should support…"	The plan is not clear on how this will be delivered and the policy attempts to collect funding for delivering the 'Radley Roads' strategy. It may currently be too restrictive or onerous on contributions from 'any' development. References should be made to viability.	We recommend considering how this could be incorporated into a contributions type policy or combined with the cycling and walking strategy.
40	4.7.3 Policies CA. 10	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.
41	4.8 Cycling and Walking 4.8.3 Policies	Each planning policy should be clearly titled.	We recommend including the following title for the policy:

			"Cycling and Walking"
	PP.14		
42	4.8 Cycling and Walking 4.8.3 Policies PP.14	The policy attempts to encourage connectivity and collect funding for contributions to improve cycling and walking in Radley.	We recommend considering how this could be incorporated into a contributions type policy or a broader connectivity policy.
43	4.8.3 Policies CA. 11	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.
44	Section 4.9 Village Connectivity 4.9.3 Policies PP. 15	This policy attempts to create specific access arrangements for the strategic housing sites. Core Policy 37 and 38 already provide a list of requirements for developers to consider and meet, before any development(s) will be approved. Consideration on viability should also be highlighted. The Emerging Local Plan states detailed masterplans and design and access statements must be submitted to the LPA for approval. Consequently, this	We recommend redrafting this policy to include sufficient flexibility in decision making if the aims are not already delivered by Local Plan policies. References should also be made to viability. Consideration should also be given to combining some aspects of this policy with a broader connectivity (cycling, walking and roads) policy.

		policy may oppose detailed masterplans as the viability and topography of the site may affect the development(s) design, access and movement.	
45	Section 4.10 Radley Station Access 4.10.3 Policies CA. 12	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.
46	Section 4.10 Radley Station Access 4.10.3 Policies PP. 16	Planning Obligations may only constitute a reason for granting planning permission if they meet the tests that are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Local Authorities need to ensure that the combined total impact of such requests does not threaten the viability of the sites and scale of development identified in the development plan.	We recommend incorporating this policy into an overarching infrastructure/community funding policy listing the projects you may wish to fund.

		It is possible that CIL contributions may be sought and used to deliver much needed infrastructure requirements to the local area.	
47	Section 4.11 Surface Water Drainage and Sewerage 4.11.3 Policies PP. 17 PP. 18	There are already a number of provisions and requirements in place, either through National Policy and Guidance or Building Regulations, for developers. This is to ensure that, where necessary, they can meet technical standards aligned to planning applications in relation to flooding. Major applications have to submit a detailed flood risk assessment, highlighting how development will either incorporate or mitigate against existing and future flooding. Consultation will also take place with the Local Water Authority, Utilities Company and the Environment Agency, to ascertain any problems and/or possible future	We recommend that the neighbourhood plan's policies are deleted because they do not meet the Basic Conditions. We recommend revising the plan's objectives and supporting text to take account of what is deliverable in a neighbourhood plan. Additionally, the Local Plan currently seeks to ensure the provision of infrastructure and it is not necessary to replicate policies already found elsewhere in a Local Plan. Therefore, it is not necessary to include this type of policy in order to meet the Basic Conditions.

		outcomes that may arise from the development. As such, it may not be practicable for all development to provide a drainage strategy. The wording in the neighbourhood plan is currently too onerous and restrictive on development and we suggest it does not meet the basic conditions.	
48	Section 4.11 Surface Water Drainage and Sewerage 4.11.3 Policies CA. 13	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.
49	4.12 Digital Connectivity CA. 14	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.
50	4.13 Conserving the Natural Environment 4.13.3 Policies CA. 15 and CA. 16	Community actions can be included to amplify the land-use policy. However, each community action should be clearly titled and distinct from the land-use policy.	We recommend moving this community action (along with any supporting text) to a separate appendix.

51	Part 5 Funding the Plan	Each planning policy should be clearly titled. At first glance this could be taken for how the plan itself was written.	We recommend calling this section "Funding the Plan's Proposals" for clarity. We also recommend including more detail in this section.
52	Part 6 Implementation	The SEA process requires the district council to monitor certain proposals in the plan.	We recommend redrafting this section following the outcome of SEA Screening, and any subsequent SEA process.