

# Headington Neighbourhood Plan

## The Neighbourhood Planning (General) Regulations 2012 – Regulation 16 Representation Form

Headington Neighbourhood Forum has prepared a Neighbourhood Plan. The plan sets out a vision for the future of Headington and planning policies which will be used to determine planning applications locally alongside Oxford's Local Plan.

Copies of the Headington Neighbourhood Plan and supporting documents are available to view on the City Council's website: [www.oxford.gov.uk/HeadingtonPlan](http://www.oxford.gov.uk/HeadingtonPlan)

### All comments must be received by 4pm on Friday 7<sup>th</sup> October

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)
- Print this form and post it to us: FAO: Planning Policy Team, Oxford City Council, St. Aldate's Chamber, 109-113 St. Aldate's, Oxford, OX1 1BX

#### How to use this form:

Please complete Part A in full, in order for your representation to be taken account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	MARTIN SMALL
<b>Address</b>	HISTORIC ENGLAND EASTGATE COURT 195-205, HIGH STREET GUILDFORD
<b>Postcode</b>	GU1 3EH
<b>Telephone</b>	01483 252040
<b>Email (USE CAPITALS)</b>	MARTIN.SMALL@HISTORICENGLAND.ORG.UK
<b>Organisation (if applicable)</b>	Historic England
<b>Position (if applicable)</b>	Principal Adviser, Historic Environment Planning
<b>Date</b>	4 <sup>th</sup> October 2016

#### **DATA PROTECTION**

We will make your comments available to the public on paper at our Council offices, Bury Knowle Library and will also publish them on our website.

We cannot accept anonymous comments. However, if you wish us to remove all personal details except your name and non-specific address (e.g. Oxford) before publishing your comments, please tick this box:

<b>Do you wish to be notified of the following? (tick as appropriate)</b>	
Local Planning Authority's Decision under Regulation 19 in relation to the neighbourhood plan, to 'make' (or adopt) the Plan under Section 38A(6) of the 2004 Act	X

# Part B - DETAILS OF YOUR COMMENT

To which part of the document does your representation relate?

Page		Section	6	Policy	
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Do you support, oppose, or wish to comment in this part of the Plan? (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

Please give details of your reasons for support/ opposition, or make comments here:

When commenting on the Draft Reg 14) version of the Neighbourhood Plan we commented that Section 6 refers to *'the range of issues that the Headington community faces'*, but that these were not identified specifically in the Plan nor was there any indication of how or where these have been identified. We considered that the identification of these issues (and how they were identified) would provide justification (or an "audit trail") for the policies of the Plan. We note that this remains the case.

(Continue on a separate sheet if necessary)

What improvements or modifications would you suggest?

Although it is not a basic condition that a neighbourhood plan contains such an "audit trail", we still consider that setting out what the specific issues faced by the Headington community are and how or where they have been identified would make the Plan more robust.

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

# Part B - DETAILS OF YOUR COMMENT

To which part of the document does your representation relate?

Page		Section	10	Policy	
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Do you support, oppose, or wish to comment in this part of the Plan? (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

Please give details of your reasons for support/ opposition, or make comments here:

We welcome Section 10, which addresses our previous comment that the Vision as set in Section 9 is a vision for the Neighbourhood Plan rather than for Headington itself. However, we note that the Plan still does not set out early on a spatial portrait of Headington based on the Character Assessment, explaining its historical development, its relationship to Oxford and its current characteristics, such as the designated heritage assets in the Plan area, including the three designated Conservation Areas within, or partly within, the Plan area. We accept though, that this is not essential to meet the basic conditions.

(Continue on a separate sheet if necessary)

What improvements or modifications would you suggest?

That the Plan sets out early on a spatial portrait of Headington based on the Character Assessment, explaining its historical development, its relationship to Oxford and its current characteristics, such as the designated heritage assets in the Plan area, including the three designated Conservation Areas within, or partly within, the Plan area.

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

# Part B - DETAILS OF YOUR COMMENT

To which part of the document does your representation relate?

Page		Section		Policy	GSC1
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Do you support, oppose, or wish to comment in this part of the Plan? (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

Please give details of your reasons for support/ opposition, or make comments here:

We welcome the addition of "historic or cultural significance" in clause 2 of Policy GSC1.

(Continue on a separate sheet if necessary)

What improvements or modifications would you suggest?

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

**Part B - DETAILS OF YOUR COMMENT**

**To which part of the document does your representation relate?**

Page		Section		Policy	CIP1
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**Do you support, oppose, or wish to comment in this part of the Plan?** (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

**Please give details of your reasons for support/ opposition, or make comments here:**

We previously suggested that the character and identity policies may need to be redrafted to be clear development management policies in accordance with: paragraph 041 of the National Planning Practice Guidance which states "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications".

We welcome the redrafting of Policy CIP1 to reflect this requirement .

(Continue on a separate sheet if necessary)

**What improvements or modifications would you suggest?**

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## Part B - DETAILS OF YOUR COMMENT

To which part of the document does your representation relate?

Page	Section	Policy	CIP2
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Do you support, oppose, or wish to comment in this part of the Plan? (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

Please give details of your reasons for support/ opposition, or make comments here:

We previously suggested that the character and identity policies may need to be redrafted to be clear development management policies in accordance with paragraph 154 of the National Planning Policy Framework which states "...Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to the development proposal should be included in the plan" and paragraph 041 of the National Planning Practice Guidance which states "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications".

Policy CIP1 has been redrafted to reflect this requirement but clauses 1 and 2 of Policy CIP2, as currently drafted, are more aspirations than planning policies.

(Continue on a separate sheet if necessary)

What improvements or modifications would you suggest?

Clauses 1 and 2 be redrafted to be clear development management policies i.e. be reworded to include "New developments will only be permitted where....." (as in Policy CIP1).

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## Part B - DETAILS OF YOUR COMMENT

**To which part of the document does your representation relate?**

Page	Section	Policy	CIP4
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**Do you support, oppose, or wish to comment in this part of the Plan?** (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

**Please give details of your reasons for support/ opposition, or make comments here:**

We continue to welcome and support the policies on character and identity as being in accordance with paragraph 58 of the National Planning Policy Framework, which states *"...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics."*

We particularly welcome, in principle, Policy CIP<sub>4</sub>, although we consider that the policy should be rewritten to include reference to designated heritage assets and non-designated archaeological remains (neither of which are identified in the Oxford Heritage Asset Register), the significance of heritage assets (what is important about them), to protect locally important heritage assets that have yet to be added to the OHAR and to recognise that an asset need not be part of a development proposal to be affected.

In addition, we previously suggested that the policies may need to be redrafted to be clear development management policies in accordance with paragraph 154 of the National Planning Policy Framework which states *"...Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to the development proposal should be included in the plan"* and paragraph 041 of the National Planning Practice Guidance which states *"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications"*.

(Continue on a separate sheet if necessary)

**What improvements or modifications would you suggest?**

We suggest that Policy CIP<sub>4</sub> be reworded e.g.: *"Where the significance of a heritage asset, either designated or non-designated, would be affected by a development proposal, that development proposal will only be permitted where it addresses the conservation and enhancement of the significance, character, setting and any special architectural or historic features of significance the asset may possess."*

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## Part B - DETAILS OF YOUR COMMENT

To which part of the document does your representation relate?

Page		Section		Policy	
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Do you support, oppose, or wish to comment in this part of the Plan? (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

Please give details of your reasons for support/ opposition, or make comments here:

We have previously noted that it would be helpful if the Plan contained some more background information on the non-designated heritage assets of the Plan area; the National Planning Practice Guidance states "...where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of *archaeological interest* to guide decisions."

There is significant archaeological interest within the Plan area, including the recorded Roman period pottery kilns recorded at the Churchill Hospital site and around Old Headington, an Anglo-Saxon cemetery at Stephen Road and the medieval archaeology of Old Headington and Headington Quarry villages and the quarries themselves. The Oxford Historic Environment Record should contain information on these sites.

(Continue on a separate sheet if necessary)

What improvements or modifications would you suggest?

The addition to the Plan of some more background information on the non-designated heritage assets of the Plan area.

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.