



County Hall
New Road
Oxford
OX1 1ND

Chalgrove Neighbourhood Plan Committee
By email: info@chalgrove-parish.org.uk

Copy: planning.policy@southoxon.gov.uk

Attn: Jo Murphy

Director for Planning and Place
– Susan Halliwell

5 June 2017

Dear Chalgrove Neighbourhood Plan Committee

Chalgrove – Pre-Submission Draft Neighbourhood Plan

Thank you for the opportunity to comment on your draft Neighbourhood Plan at this stage before you finalise your Plan for Submission. As you were unable to give us an extension of time, I am sending these comments now.

Chalgrove is one of the larger villages in South Oxfordshire. The South Oxfordshire Local Plan Second Preferred Options, consulted on to May 2017, proposes a strategic allocation adjacent to the existing village at Chalgrove Airfield, within the Neighbourhood Plan area. This allocation, if adopted, suggests some 3,000 houses will be built in this location. On this basis, the Local Plan consultation draft suggests no need for additional housing in Chalgrove village itself, although 236 houses would meet a target of 15% growth in the village between 2011 and 2033.

Your draft Neighbourhood Plan proposes to allocate one site (H1 Option A West of Marley Lane) for some 200 dwellings. There is a current application on this site - P17/S0094/O for up to 200 dwellings, a building for community use (D2 Use), open space, a sustainable drainage system, and associated infrastructure. It is expected that this will be taken to Committee on 14th June 2017 with a recommendation for approval.

We are aware that another option for allocation (H1 Option B East of Chalgrove) was subject to an application P16/S4062/O for some 120 dwellings but this was refused on 26 April 2017. At the time of writing an appeal has not been lodged.

Attached are some comments from the County Council. These are officer comments made in good faith but do not restrict our ability to raise matters at the formal Submission stage of your Neighbourhood Plan. Our principal concern is that the draft Plan does not deal with the effects of the proposed strategic allocation. We recommend that the Neighbourhood Plan group seek advice from South Oxfordshire District Council on their position with regard to the Neighbourhood Plan and Chalgrove Airfield and whether the proposed strategic site will continue to be treated as part of the Neighbourhood Plan area.

Yours sincerely

Lynette Hughes
Senior Planning Officer

Email: Lynette.Hughes@oxfordshire.gov.uk
General Email: southandvale@oxfordshire.gov.uk





ATTACHMENT – COMMENTS FROM OXFORDSHIRE COUNTY COUNCIL CHALGROVE DRAFT NEIGHBOURHOOD PLAN – JUNE 2017

Transport Strategy

Chalgrove Airfield

1. The draft plan does not provide for development at Chalgrove Airfield. Without development at Chalgrove Airfield the implications for transport are substantially different from those identified in the Local Plan. We have concerns over this approach as issues are not addressed in the Neighbourhood Plan at this stage which are likely to be important if Chalgrove Airfield is allocated (for example the potential realignment of the B480, traffic impacts on Chalgrove village etc).

Proposed Allocation

2. An outline planning application is in progress for the single site allocated for development within the draft pre-submission Neighbourhood Plan (Land West of Marley Lane: Application P17/S0094/O). This application has been amended: an initial Transport objection was lodged (based upon swept path analysis, access widths, access offset and an associated road safety audit), but subsequent iterations of the application have dealt with initial concerns and the County no longer has a highways objection. It is understood that the application is likely to be brought to Committee on 14th June for resolution and that the Parish Council is supportive of the application.

Walking, Cycling, Shared Space and Traffic Calming

3. Policy H5 (page 35) deals with Walking and Cycling. The County Council supports aspirations to improve walking and cycling links. Any deficiencies in the local network away from allocated development sites could potentially be addressed using CIL money (the portion that the parish will receive). Improving walking and cycling links could be added to table 4 in the document. Table 4 on page 41 contains no reference to aspirations for transport-related improvements. If seeking to spend CIL contributions on any transport measures they should be included in this table.
4. Page 38 suggests shared space/traffic calming measures. Further work would be required to look at the issues in the village and whether shared space and/or traffic calming would be an appropriate solution.

Education

Summary

5. The application in respect of 200 new homes on the site proposed for allocation in this Plan have been assessed to generate demand for 11 children qualifying for free nursery education (under current statutory entitlement), 55 primary pupils and 37 secondary pupils. In addition there is a statutory duty to ensure there is sufficient childcare to enable parents to take up or

remain in work. These numbers will impact on the existing schools and nurseries, but may be insufficient numbers to make expansion worthwhile financially.

6. Both primary and secondary education provision for Chalgrove need to be considered in the context of the large-scale growth proposed in the recent SODC Local Plan consultation for Chalgrove Airfield, which also lies within the school's designated area. Whilst it is noted that the Neighbourhood Plan opposes this allocation, if it is nonetheless approved, it would significantly change the potential education solutions and opportunities in this area.
7. The Neighbourhood Plan group may wish to consider including policies supportive of the expansion and/or creation of early years, childcare and primary education facilities.

Detailed comments

Primary education

8. Chalgrove Primary School is a 1 form entry school, admitting up to 30 children per year and with a total capacity of 210 places (excluding the nursery). As of January 2017 the school has 178 children on roll; the school therefore has 32 spare places overall, but some year groups are full. At this moment, it therefore does not have sufficient capacity to meet the expected needs of the proposed scale of development. However, birth rates have slowed in recent years, resulting in lower primary school intakes. If this trend continues, the school may be able to accommodate the scale of housing growth indicated. Inevitably, there is uncertainty over future birth rates.
9. Should Chalgrove Primary School have insufficient capacity to meet the needs of local population growth, its current site area indicates it has the potential to expand. However, for reasons of effective class organisation, it would need to expand to 1.5 form entry, i.e. by 50%. To sustain pupil numbers at 1.5 form entry level would require a higher scale of housing growth than that currently proposed for the village. There is, therefore, a real risk that the proposed scale of growth exceeds the school's current capacity without making expansion sustainable.
10. If the proposed strategic allocation to Chalgrove Airfield is approved, it would be expected to include its own primary school(s). However, strategic planning of primary school provision across the area could provide an opportunity for the existing primary school to also expand to 1.5 or 2 forms of entry, which would offer benefits to the financial sustainability of the school, and also allow for significant new accommodation to be provided.

Secondary education

11. Chalgrove lies within the designated area of Icknield Community College, a 5 form entry 11-16 school in Watlington, admitting up to 140 children per year and with a total capacity of 700 places. As of January 2017 the school has 611 children on roll, with spaces in most year groups (although numbers fluctuate and the school admitted over its admission number for 2016, and has allocated more places than its admission number for September 2017 arrivals, indicating growing demand for places at the school).

12. While it currently, therefore, has 89 spare places, more than the expected pupil generation from the proposed scale of housing growth within the Chalgrove Neighbourhood Plan, this number is expected to fall over the coming years. Moreover, the school serves a large designated (catchment) area, and will also be affected by the significant scale of development underway and proposed at neighbouring settlements such as Benson and Chinnor, as well as at Watlington itself. The school does not have sufficient current capacity to meet the cumulative needs of development within its designated area.
13. If the proposed Chalgrove Airfield strategic development is not approved, it would be expected that Icknield Community College would need to expand on its current site and continue to serve Chalgrove.
14. If, however, the proposed Chalgrove Airfield strategic development is approved, then the combined impact of all the currently proposed scale of growth, in addition to the existing population, within Icknield's designated area would exceed the expansion potential of the school's site, but would not make a new secondary school on Chalgrove Airfield sustainable without threatening the viability of Icknield Community College.
15. If the proposed Chalgrove Airfield allocation is approved, a strategic solution will be necessary to provide secondary education across the area. To this end, the County Council in its comments on the Local Plan Preferred Options has suggested the possibility of the existing Icknield Community College being relocated to Chalgrove Airfield, if that strategic allocation is confirmed, to enable it to expand. This would bring benefits to the financial sustainability of the school, and enable it to widen its curriculum offer, most notably by extending its age range to include sixth form education, which is not viable at the school's current size. It would also enable complete replacement of the school's accommodation.

Early education and childcare

16. Early education and childcare provision in Chalgrove is currently delivered by Chalgrove Primary School's nursery class, The Oxford Nursery and one childminder. The scale of housing growth proposed in this application in isolation should be able to be accommodated by these existing providers, based on past take up of available places. However, if local housing growth is greater than that currently envisaged in this Plan, then additional early years and childcare capacity would be required in order to meet the needs of the increased population. The Neighbourhood Plan may, therefore, wish to consider including policies supportive of the expansion and/or creation of early education and childcare facilities.

Public Health

17. Although protecting health and wellbeing are fundamental needs of any community and the majority of the plan's objectives have direct health implications, neither the Vision nor the Objectives overtly make the case for development maintaining or improving the health and wellbeing of people living, working and visiting Chalgrove. Key public health points to consider including in the vision and objectives and highlighting in the policies that follow would include encouraging the development of an environment which:
 - *provides opportunities for people to be more active* - this could be used to reinforce the case for Policy H5 Walking and Cycling. In addition to maximising the integration of new

development with the existing community and ensuing that new developments do not exacerbate existing traffic problems, specific reference could be made to the need for developing/upgrading walking and cycling infrastructure around schools (which often generate significant amounts of local traffic), and on routes from peripheral carparks to schools and other amenities that could be used for ‘park and stride’ initiatives. This could also be used to support the need for publically accessible open space, recreation grounds and design considerations, such as permeable street layouts that avoid cul-de-sacs.

- *provides opportunities to make healthier food choices* - this could be linked to the need to support local shops and retain/expand allotment provision.
- *fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness* – this could be used to make the case for multi-functional community facilities, green infrastructure and public realm. In addition to helping to maximise potential for physical integration between the existing fabric of Chalgrove and new development sites, creating spaces that bring people together will support mental wellbeing/community spirit. Creating an environment that allows people to be more active will also protect and enhance mental health and wellbeing.
- *enables people to maintain their independence for longer* - this could be used to reinforce the case for Objective 4 to ensure that new homes accommodate the existing and future needs of local residents and Policy H5 concerning the development of walking and cycling infrastructure that will enable older people to independently access local shops and amenities without having to rely on private transport. Similarly this could also be applied to the design of public realm, such as step free access, the provision of benches and the replacement of footpath styles with accessible gates.

18. The above are supported by NPPF paragraphs 7, 35, 50, 69, 156 and the PPG ‘Health and Wellbeing’ chapter.

Environmental Strategy

19. We welcome the focus on enhancing the biodiversity within the parish and the recognition of the value of the waterways and support proposals for new development to enhance (provide a net gain), in biodiversity.
20. The enhancement of biodiversity and natural green spaces in and around the town, in addition to the formal green spaces / play areas, could usefully be included within the list of CIL projects.
21. The neighbourhood plan team should note the progress that has been made on the revised SODC Green Infrastructure Strategy (in draft) as a source of further information on green infrastructure (GI) opportunities.
22. There is now strong evidence on the benefits of green infrastructure for people and communities. We welcome the support given to identifying and protecting existing green space and support efforts to provide new green infrastructure, of many different forms, within the neighbourhood plan area and new developments in particular.

24 May 2017
Our ref: 808

CHRISTIAN
LEIGH

Jo Murphy, Clerk
Chalgrove Parish Council
c/o 13 Laurel Close
Chalgrove
Oxfordshire
OX44 7RE

Chartered Town Planner

Leigh & Glennie Ltd
6 All Souls Road, Ascot,
Berkshire, SL5 9EA
Telephone: 01344 297094
Fax: 01344 628961
mail@christianleigh.co.uk

www.christianleigh.co.uk

Dear Ms Murphy

Chalgrove Draft Neighbourhood Development Plan: Pre-Submission version (April 2017)

I act on behalf of the owners and occupiers of Rofford Manor, Rofford Manor Cottage, on Rofford Lane, and at Rofford Hall, Rofford Hall Cottage, 1 & 2 Rofford Hall Studio, Rofford Lodge and Rofford Farm Cottage , Little Milton, which lie to the north west of Chalgrove. I write to set out their comments on the above document.

My clients welcome the document in setting out a vision for Chalgrove village, which is based on an understanding of what makes the village have its own unique character and community spirit. They also welcome the recognition that the village has to change in the coming years to accommodate a suitable level of new housing and employment development, to ensure that services and facilities are enhanced in the village, and that this is achieved whilst protecting the character of the village and its landscape setting.

Within the above framework of objectives, the Draft Neighbourhood Plan rejects the idea of a strategic site allocation at **Chalgrove Airfield (p22-23 of the Plan)**. My clients concur with the Plan's opposition to such an allocation, for the same reasons as stated in the Plan.

However, my clients object to the proposed allocation of housing as **Policy H1 Land West of Marley Lane**. This draft Policy states that the site is '*better related to the village, has the capacity to be designed in a way that integrates it into the village*' and '*performs satisfactorily*' in terms of walking and cycling to the village. Those statements are strongly contested on the following grounds.

Impact on character, countryside and landscape

The draft allocation is for a ribbon development that represents a westwards 'drift' of housing out from the compact centre of Chalgrove. It is a spread of housing that goes along the main road, with simply no relationship to the village at all, and so represents a rural-based but suburban housing estate of the scale and layout that is reminiscent of past ideas that led to poorly-thought out sprawling schemes on the edges of villages. This can be seen in an extract from the site plan submitted with the current planning application on the land:



Member of the Royal
Town Planning Institute

Directors:
Christian Leigh BSc(Hons)
MPhil MRTPI
Jane Glennie BA(Hons)



This form of development bears no relationship to the character of Chalgrove or the wider countryside. The proposal has not been informed by any clear response to its setting, and in fact would only make sense if the larger Airfield site is developed, as can be seen in the other plan submitted by the applicants for the current scheme on the land:



The Character Appraisal that accompanies the draft Neighbourhood Plan describes this approach to the village as pleasantly rural, and the land does form an open and clear countryside setting when approaching the rectilinear form of the village. Furthermore, the SODC Landscape Capacity Study (2015) did not assess this site: the assessment was of the smaller 2.1ha site first shown as a ‘Community Identified Site’ in the draft Chalgrove Neighbourhood Plan, May 2014 (referred to as Site CHAL1 in the 2015 Landscape Study). The Landscape Study found development should be further considered on this land but – most importantly – in fact on a smaller area of the site. The Study said:

‘It is recommended that CHAL 1 is considered further as a site option on landscape and visual grounds. The developable area is slightly reduced to limit the impact on the rural approach into, and past, Chalgrove and soften the edge of the village opposite the allotments.’

Thus, instead of slightly reducing the area of land as recommended, the 2017 draft Neighbourhood Plan has in fact greatly increased the proposed allocation. This clearly has an *‘impact on the rural approach into, and past, Chalgrove’*. The Sustainability Appraisal (2017) that accompanies the draft Neighbourhood Plan has not undertaken a systematic appraisal of the likely significant effects on the landscape arising from the proposed larger Marley Lane

allocation compared to the likely effects arising from alternative sites for allocation. Such an assessment of the effects and necessary mitigation is required by the SEA Regulations.

The draft allocated site is largely within areas shown as Flood Zones 2 and 3, with development in Flood Zone 1. The Environment Agency has objected to development on the land. This is a further key objection to the site that derives from the inherently unsuitable nature of this parcel of land on the western approach to the village.

The allocation of this large area of land – much bigger than originally identified as suitable for Chalgrove, would thus be harmful to the village and the countryside.

Impact on sustainable development objectives and traffic generation

This pattern of development would also create a pattern of unsustainable dependence on the private car. The new housing would, at its furthest point, be over a mile from the centre of the village. That is over a 20 minute walk, or an (unlikely) 15 minute ride by the hourly bus service, but only 3 minutes by car: it is clear the new residents would choose to use their car over other means of transport. The site specific policies at page 27 of the draft Neighbourhood Plan do not provide any requirement to improve public transport, cycling or pedestrian provision; indeed, the references are only to making car movement convenient. And, indeed, the current planning application on the land makes no reference to improving sustainable transport measures.

Furthermore, the draft Neighbourhood Plan does not appraise whether the larger Policy H1 Marley Lane allocation is a sustainable location for housing in relation to transport, and nor does the accompanying Sustainability Appraisal (2017). The SA assesses other matters that concern sustainability, but there is no assessment in Table 6.3 of whether any draft allocated site is well-located to give a choice of alternative travel means and so how that will affect the environment, climatic factors and human health in the short, medium and long term, nor is there any appraisal of necessary mitigation measures arising from potential allocation of a housing site.

All such assessment is required under the SEA Regulations, and further required by PPG: Transport Evidence Bases in Plan Making and Decision Taking, which states that local planning authorities must '*undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan*' (paragraph 001). The PPG continues to say that (paragraph 004):

An assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:

- *as part of the initial evidence base in terms of issues and opportunities*
- *as part of the options testing*
- *as part of the preparation of the final submission*

Paragraph 008 says that the impact of land allocations must be considered in assessing the transport implications of Local Plans and says that '*An assessment of the impacts of the proposed additional land allocations can be initiated once initial potential allocations have been determined*'. There is detailed guidance on the assessment that must be undertaken.

None of the above has been undertaken in the preparation of the draft Neighbourhood Plan in relation to the Marley Lane site, or any others. As stated earlier, my clients are concerned with regards to the SODC draft Strategic Allocation for the Airfield, largely on the basis of the

sustainability implications for such a large housing development unrelated to Chalgrove that will be serving Oxford and leading to a great increase in traffic on the local roads; Chalgrove Parish share those concerns.

The proposed allocation of 200 houses on the western side of Chalgrove – the Oxford side of the village – gives rise to the same fears for my clients. The remoteness of the site from the village centre, with convenient access to the main road (as noted, ironically that is the only traffic-related requirement set out in the draft Neighbourhood Plan) will realistically lead to this new allocation just being housing serving Oxford. And, ironically again, unlike the Airfield ideas the Marley Lane allocation in fact simply has no measures to improve sustainability and increase the mode of transport options. That is a serious failing of the proposed allocation and, as mentioned above, a defect in the assessment process of the sites and the preparation of the draft Plan.

The preferred allocation

My clients do not object to the area of land that was first proposed for allocation at Marley Lane. As noted, the original area of land first shown as a ‘Community Identified Site’ in the draft Chalgrove Neighbourhood Plan, May 2014 was the well-contained Marley Lane/High St/B480 triangle, and land to the south of that. In fact, the 2017 draft Neighbourhood Plan is accompanied by the publication of a ‘Site Criteria’ document (May 2016), and that document indicates that it was the original Community Identified Site as the that has been appraised:

CHAL 1 - Land west of Marley Lane



This smaller site shown as Site 1 above would be a more reasonable allocation for this side of the village:

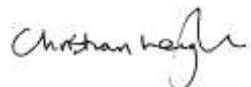
- It would not encroach into the open countryside as a ribbon form of development. The allocation would be consistent with the findings of the 2015 Landscape Study.
- It would lead to housing closer to the village centre which is a walkable distance from services, unlike the westernmost end of the larger site.
- It would not be a very large allocation on the Oxford side of the village which would serve as a dormitory allocation for the City.
- Thus, there would not be any conflict with the SEA requirements and the PPG.

Conclusions

Whilst there is much to support in the draft Neighbourhood Plan, my clients consider the allocation of the large H1 site for 200 houses to be fundamentally flawed. It is not based on a robust assessment of the impact upon the countryside or sustainable development objectives. It will lead to a spread of housing that simply becomes a dormitory to Oxford, with the landscape harm and risks from flooding.

A fair and comprehensive assessment of the alternatives for Chalgrove is needed, to identify the smaller area of land at Marley Lane, along with alternative sites for housing.

Yours sincerely,



Christian Leigh
cc Mrs Desmond, SODC



Chalgrove Parish Council
13 Laurel Close
Chalgrove
Oxfordshire
OX44 7TE

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB
T: 01260 288800
F: 01260 288801
www.gladman.co.uk

By Email: info@chalgrove-parish.org.uk

5th June 2017

Dear Sir / Madam,

Re. Chalgrove Neighbourhood Plan: Pre-submission consultation

This letter provides the response of Gladman Developments Ltd (hereafter referred to as "Gladman") to the current consultation held by Chalgrove Parish Council (CPC) on the pre-submission version of the Chalgrove Neighbourhood Plan (CNDP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

Gladman would like to offer our assistance in preparing the draft neighbourhood plan and invite the Parish Council to contact us in this regard.

Development Plan

The current Development Plan relevant to the preparation of the CNDP consists of the South Oxfordshire Core Strategy, which was adopted by the Council in December 2012 covering the period to 2027, and the saved policies of the South Oxfordshire Local Plan 2011.

Emerging South Oxfordshire Local Plan 2033

South Oxfordshire District Council (SODC) is currently preparing a new Local Plan which will set out the strategy for delivering sustainable growth in the District to 2033. A further round of consultation on the Second Preferred Options commenced on 29th March 2017 and ran until 17th May 2017. A Call for Sites exercise was also consulted upon by the Council during the same timeframe as the Second Preferred Options consultation and Gladman submitted the 'Land off Monument Road' site as part of this consultation.

The emerging Neighbourhood Plan needs to have due regard to the emerging Local Plan and should aim to be in general conformity with it.

Oxford City's Unmet Need

Public bodies have a Duty to Co-operate on planning issues that cross administrative boundaries.

One of the key issues identified in the 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) is how to address the unmet housing need arising from Oxford City. In order to address this issue the Oxfordshire Growth Board agreed to establish a working group with the aim of reaching agreement between the Local Authorities on the level of unmet housing need of Oxford City together with an appropriate apportionment that

could then be taken forwards through the Local Plans for each District. This programme is called the Post SHMA Strategic Work programme.

The working group commissioned a study to identify what the unmet need of Oxford is. This concluded that the unmet need totalled 15,000 dwellings over the emerging Plan period. This unmet need figure has yet to be tested.

On 26th September 2016, the five Authorities that make up the Oxfordshire Growth Board (OGB) (Cherwell, Oxford, Vale of White Horse, South Oxfordshire and West Oxfordshire) met to discuss the apportionment of Oxford City's unmet housing need and to sign a Memorandum of Understanding (MoU) to this effect.

Prior to the meeting, papers (CD11.3) were published which recommended the following apportionment in addition to their own identified needs:

- Cherwell – 4,400 dwellings
- Oxford – 550 dwellings
- South Oxfordshire – 4,950 dwelling
- Vale of White Horse – 2,200 dwellings
- West Oxfordshire – 2,750 dwellings

At the meeting SODC declined to sign the MoU and expressed concerns about the evidence base used to inform the proposed apportionment, their ability to meet their own housing needs, and whether the City itself could actually accommodate more dwellings than it suggests.

The redistribution of Oxford's unmet need has yet to be resolved.

Given the uncertainty of Oxford City's housing needs and the 1,200 dwellings that is still to be agreed, the CNDP should seek to be aspirational and growth orientated so that it can assist the Council in meeting full objectively assessed needs for housing.

Chalgrove Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the CNDP as currently proposed. It is considered that some policies do not reflect the requirements of national policy or guidance nor are they supported by the necessary evidence needed to justify their inclusion within the Plan and should therefore be revisited prior to progressing the Plan to examination.

The Parish Council have made some effort to make the plan consistent with the emerging South Oxfordshire Local Plan (SOLP). However there are still a number of conflicts which need to be addressed prior to submission to ensure that the plan meets the tests for soundness.

The plan-period

The CNDP states that the plan '*has a 16-year time frame in line with South Oxfordshire District Council Local Plan time frame 2016 to 2032*'. This is factually incorrect as the plan-period for the emerging SOLP (from anticipated adoption) is 15 years from 2018 to 2033.

As discussed above, it is a basic condition that the CNDP complies with the spatial strategy for the district. As advised by the PPG, a draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition, and although a draft neighbourhood plan is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the considerations against which the neighbourhood plan is tested. The emerging CNDP should therefore clearly reflect the plan-period set out within the emerging SOLP.

This also underscores the volatility of the current planning policy context within the district, and for this reason we would urge the Council to 'futureproof' the CNDP by planning positively for sustainable development through including additional housing land/reserve sites and allowing for the necessary flexibility so that the plan is not superseded by the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004 which states that:

'If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).'

We recommend that prior to submission, the Parish Council should consider the plan-period for the CNDP, as well as the potential implications that this may have for the objectives and policies of the plan.

Policy C1 – Development Within the Built-up Area

Gladman object to the use of defining a built up edge if this would preclude the delivery of sustainable development to meet identified housing needs. Gladman consider that the proposed policy would actively restrict sustainable growth opportunities despite the clear need in both the local and wider housing market area.

The Framework is clear that sustainable development should go ahead without delay in accordance with the presumption in favour of sustainable development. The use of a settlement boundary to define the built up area in the manner proposed will act to arbitrarily restrict suitable and sustainable development from coming forward and does not therefore accord with the positive approach to growth required by the Framework.

To better accord with the requirements of the Framework, Gladman recommend that Policy C1 is modified to ensure a consistent approach to the presumption in favour of sustainable development. The following wording is put forward for the Parish Council's consideration:

"When considering development proposals, the Chalgrove Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Chalgrove Neighbourhood Plan will be supported particularly where they provide:

- New homes including market and affordable housing to meet identified housing needs; or
- Opportunities for new business facilities through new or expanded premises; or
- Infrastructure to ensure the continued vitality and viability of the neighbourhood area.

Development adjacent to the built up area will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.

Development of land not adjacent to the built up area will be classified as countryside. Appropriate development outside and not adjacent to the built up area would be: Agriculture, forestry, recreation grounds, sports pitches, flood alleviation, wildlife conservation area, wildflower meadow and allotments."

Policy C2 – Design and Character

This policy states that '*the form and scale of buildings should reflect the neighbouring properties. Buildings should be a maximum of 2-storeys in height (based on a residential storey of 3 metres)*'.

Gladman are supportive of policies that seek to ensure that new development responds positively to setting and in particular the scale and form of surrounding built form. However, the current wording of this policy has the potential to have the unintended consequence of stifling the variety of form and legibility within new developments. For example, careful use of varying building heights is often used to provide identity to layout and to frame key views along streets. A rigid requirement for all buildings to be a particular height therefore limits the range of tools available to architects and urban designers in creating quality spaces.

It is our view that this policy would be more effective by removing the requirement for buildings to be a maximum of 2-storeys in height. The policy could instead retain the requirement for new development to be of a form and scale that reflects their surroundings, which would be sufficient to achieve Objective 2 – '*to ensure that new housing development is in character with the village*'.

Further, this policy also requires all development proposals to be in accordance with the South Oxfordshire Design Guide. Gladman is concerned that this would require all development proposals to incorporate principles of design guidance which are non-statutory in nature. As such, it is recommended that the wording of this policy is modified to that of 'support' rather than a requirement which could have adverse effects on development viability.

In addition, this policy sets out a requirement to protect and enhance views into and out of the village and have sensitivity to preserving the views to and from the AONB. Whilst the general thrust of this policy is supported, it is not clear what evidence, if any, has been prepared to support the key views shown in Map 2 'Chalgrove Village Views'. These matters are considered in detail through the planning application process, which attaches great importance to views of the AONB in accordance with national planning policy. This map is not supported by evidence and is not necessary, therefore we would recommend that this is not included in the submission CNDP.

Housing – Land at Chalgrove Airfield

As highlighted above, neighbourhood plans are required to be in 'general conformity' with the strategic policies contained in the adopted Development Plan. However, the PPG also highlights the need to take account of the direction for growth contained in emerging Local Plans and makes clear that 'although a draft neighbourhood plan or Order is not tested against policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.¹

This means that if and when the CNDP is submitted for examination, the independent examiner will need to be satisfied that the CNDP has taken active consideration of the direction taken in the emerging SOLP and does not seek to undermine, the overall strategy set out in the emerging SOLP.

In addition, it is important to note that if the CNDP is progressed prior to the adoption of the SOLP, the SOLP can effectively supersede the CNDP where there is significant conflict with the overall spatial strategy, which could significantly undermine the CNDP in the future. It is therefore important that a positive and integrated approach is taken that is consistent with the emerging SOLP.

The emerging SOLP currently proposes to allocate 'Land at Chalgrove Airfield' for 3,000 new homes (Policy STRAT9), which will help to address the District's objectively assessed housing needs within the plan-period, as well as partially addressing the unmet needs arising from neighbouring Oxford City.

The CNDP currently rejects the emerging allocation and is therefore inconsistent with the emerging SOLP. Gladman appreciates the strong feelings that there may be regarding the redevelopment of Chalgrove Airfield. However, it is evident that the CNDP cannot be considered to be have sufficient regard to the emerging SOLP as it currently stands.

Given these significant differences, we recommend that the Parish Council work more closely with the SODC to achieve an integrated policy, as the current approach risks the CNDP failing at examination, or being superseded soon after adoption by the SOLP.

Furthermore, we recommend that the CNDP works to positively identify additional housing land to contribute towards the delivery of housing in the short-term until the Chalgrove Airfield site begins to deliver. This will ensure that the Council can meet its objectively assessed housing needs and demonstrate the five year supply of housing required by national planning policy.

¹ PPG Paragraph: 009 Reference ID: 41-009-20160211

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI

VAT Registration No. 677 6792 63

Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567

Site Submission

The Parish Council will be aware of the ongoing promotion of the site at 'Land off Monument Road, Chalgrove' for residential development. Gladman consider that development of this site would represent a sustainable extension of Chalgrove and make a significant contribution towards meeting the need for market and affordable housing, as well as delivering wider community infrastructure benefits.

The site, which is identified in the CNDP as 'Site 8', extends to approximately 12 hectares and is located to the north of the main built-up area of Chalgrove, to the east of the emerging allocation at Chalgrove Airfield, and is therefore well located for access to key services and facilities.

As identified within the CNDP Site Assessment document (May 2016), the site is relatively flat and well screened by vegetation and hedgerow along the site boundaries, with the landscape setting mostly defined by the B480 and Monument Road. The site is also located in an area of low risk of flooding from rivers and surface water. The assessment notes the proximity of the Chalgrove Historic Battlefield, however this only affects a small portion of the site we are confident that any potential impacts could be carefully mitigated as part of any development proposal. This approach is consistent with that taken by SODC in respect of the Airfield site which also includes part of the Battlefield.

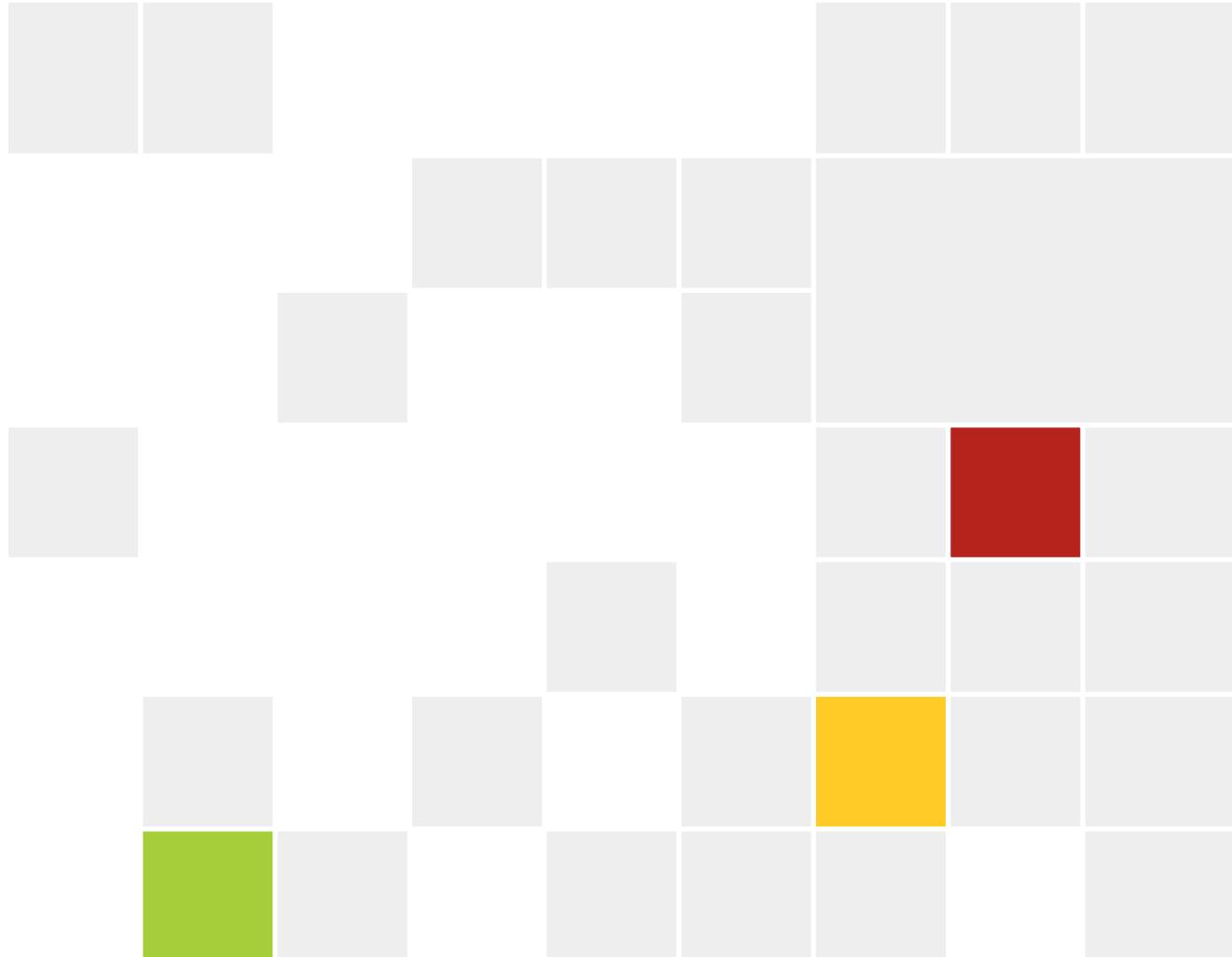
Gladman consider that the site should be included in the Chalgrove Neighbourhood Plan as it provides a sustainable location for future growth, consistent with the requirements of the Framework which make clear that development that is sustainable should proceed without delay, in accordance with the presumption in favour of sustainable development.

I hope that you have found these representations to be constructive. Should you wish to discuss the contents of this response please do not hesitate to contact me.

Yours faithfully,

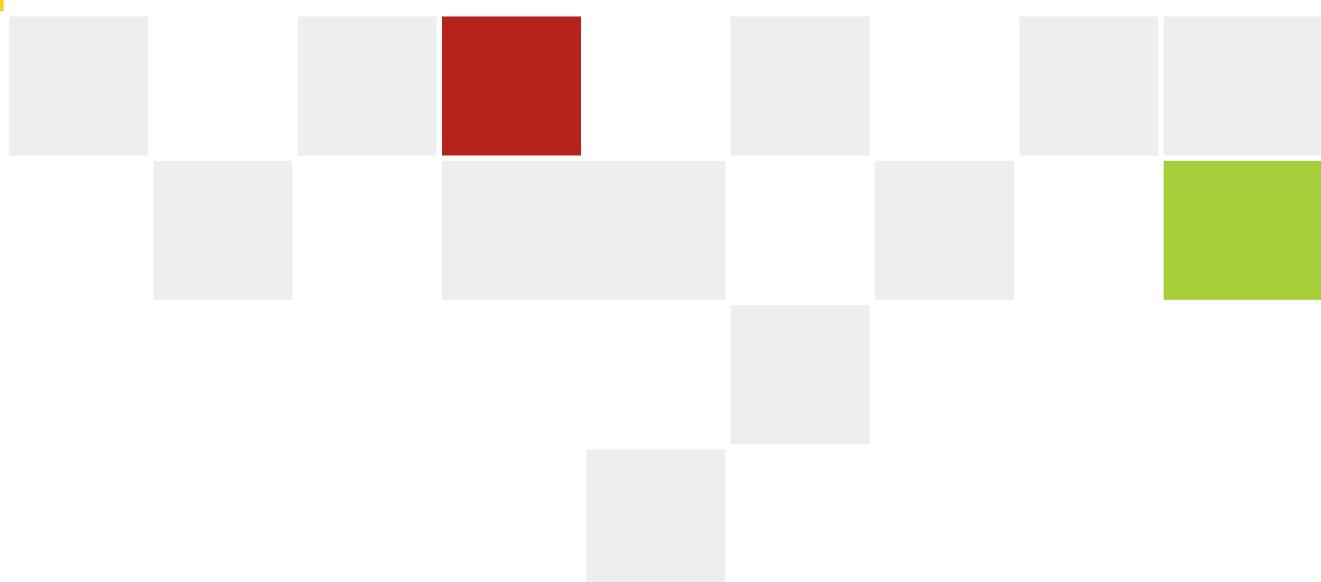
John Fleming

Policy Planner
Gladman Developments Ltd



Land east of Chalgrove

Representations to the Pre-Submission Chalgrove
Neighbourhood Plan April 2017



Boyer

Report Control

Project:	Land east of Chalgrove
Client:	Wates Developments Ltd
Reference:	13.151
File Origin:	Z:\Project Folders\13.151 Top of Town Field, Chalgrove, Oxfordshire\4 Boyer Planning\4.02 Reports\Neighbourhood Plan 2017\170516 Neighbourhood Plan Representations.docx
Primary Author	Mandy Owen
Checked By:	Mike Newton

Issue	Date	Status	Checked By
1	22.5.17	Final	Mike Newton

TABLE OF CONTENTS

1. Introduction	2
2. Legal and Policy Context	3
3. Chalgrove Neighbourhood Plan Evidence Base	6
4. Response on Specific Policies of the Pre-Submission Version of the Chalgrove Neighbourhood Plan	11
5. Land east of Chalgrove	16
6. Summary and Conclusions	25

APPENDIX

Appendix One – Site Location Plan: Land east of Chalgrove

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Wates Developments Ltd in response to the Pre-submission Chalgrove Neighbourhood Plan ‘Regulation 14’, as prepared by Chalgrove Neighbourhood Plan Steering group.
- 1.2 Wates Developments Ltd ('Wates') control land located to the immediate east of the village (Site Location Plan included at Appendix 1 for reference). The site is considered suitable for new residential development.
- 1.3 This response to the Pre-submission version of the Chalgrove Neighbourhood Plan (CNP) contains particular comments on the following policies, assessed against the relevant legal requirements and planning policy context outlined in Section 2:
 - Policy C1 – Development within the built-up area
 - Policy C2 – Design and Character
 - Policy H1 – Housing Site Allocations
 - Policy H3 – Home Working
 - Supporting Statement – Flooding
 - Supporting Statement – Business Development
 - Supporting Statements
- 1.4 Wates welcome the opportunity to comment on the CNP and would be happy to discuss the content of these representations if considered helpful.

2. LEGAL AND POLICY CONTEXT

The Scope of the Examination

- 2.1 It must be demonstrated that a Neighbourhood Plan conforms to the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (TCPA 1990).
- 2.2 It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the basic conditions. These are set out in Schedule 4B paragraph 8(2) TCPA 1990. In order to meet the basic conditions, the making of the Neighbourhood Plan must:
 - Be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan (see below); and
 - Not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 2.3 Regulations also require that a Neighbourhood Plan should not be likely to have a significant effect on a European Site or a European Offshore Marine Site either alone or in combination with other plans or projects.
- 2.4 In examining the Plan the Independent Examiner is also required to establish that the Neighbourhood Plan:
 - Has been prepared and submitted for examination by a qualifying body;
 - Has been prepared for an area that has been properly designated;
 - Includes development that is excluded development (it cannot);
 - Relates to only one Neighbourhood Area; and
 - Contains only policies that relate to the development and use of land.

National Planning Policies and Guidance

- 2.5 As set out above, there are basic conditions that the Neighbourhood Plan must have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.
- 2.6 Paragraph 16 of the National Planning Policy Framework (NPPF) relates to neighbourhood planning and states that: "*The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:*"
 - *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*

- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and*
 - *identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.”*
- 2.7 Paragraph 184 also reiterates the need for Neighbourhood Plans to be aligned with the strategic needs and priorities of the wider local area and states that: “*...Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan ... Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.*”
- 2.8 Further guidance on the basic conditions that a draft neighbourhood plan must meet if it is to proceed to referendum is also provided in the National Planning Practice Guidance (NPPG).
- 2.9 The Neighbourhood Plan must give sufficient clarity to enable a policy to fulfil the development management role that it is intended to do; or have due regard to Guidance. For example, the NPPG states that (Paragraph: 041; Reference ID: 41-041-20140306):

“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. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

- 2.10 The NPPG confirms that a neighbourhood plan can allocate sites for development but explains that, in order to do so, “*...A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria*” (Paragraph: 042 Reference ID: 41-042-20140306).
- 2.11 In this regard, there also has to be evidence to support the particular policy/policies, notwithstanding that they may represent a strong and well-intentioned aspiration or concern of the local community. In this regard the NPPG states that (Paragraph: 040; Reference ID: 41-040-20160211):

“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. 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 or the proposals in an Order.

A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body...

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.”

The Development Plan – Strategic Policies

- 2.12 It is a basic condition that the Neighbourhood Plan must be in general conformity with the strategic policies of the development plan for the area. The development plan for the neighbourhood plan area currently comprises the saved policies of the South Oxfordshire District Council Local Plan 2011 (2006) and Core Strategy (2012).

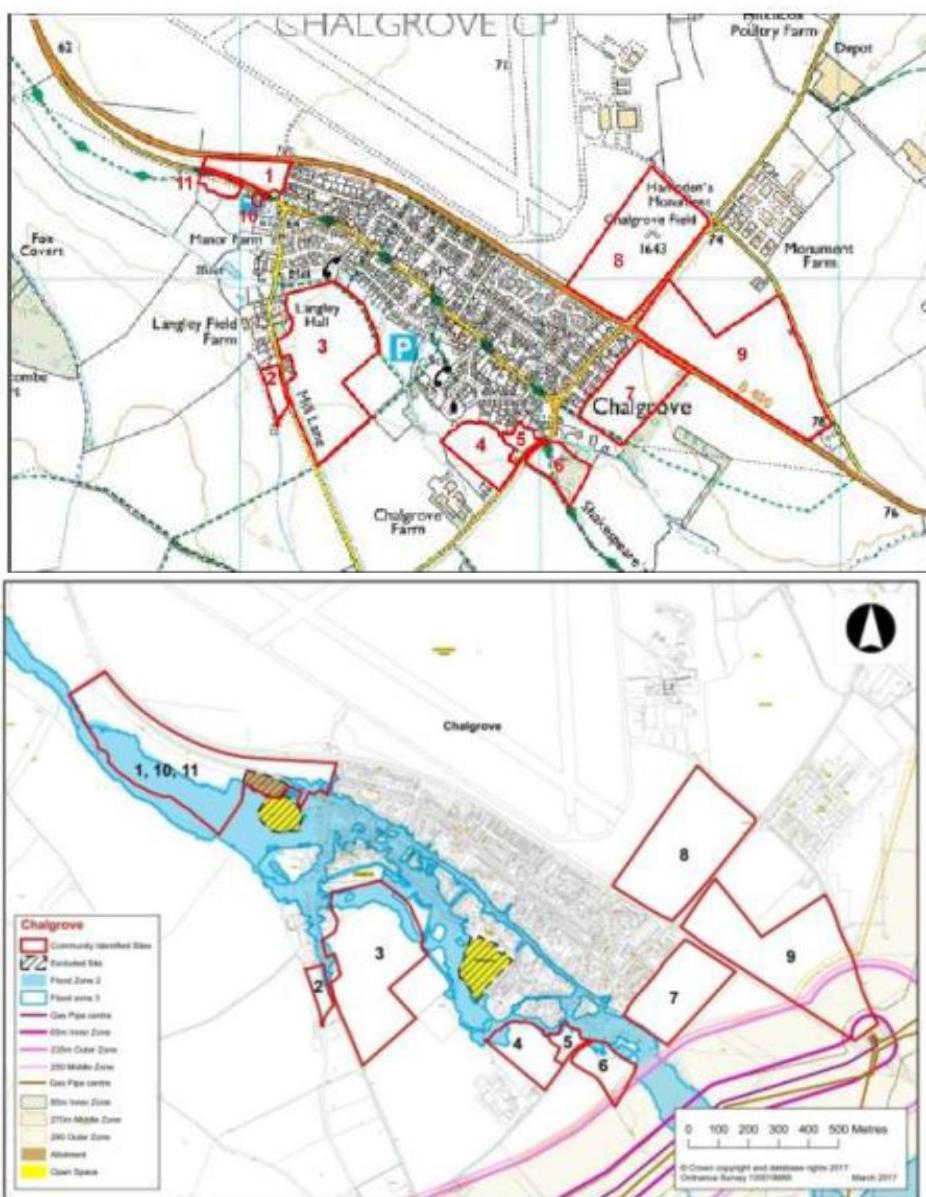
3. CHALGROVE NEIGHBOURHOOD PLAN EVIDENCE BASE

- 3.1 The CNP is supported by a number of documents which form the evidence base for the Neighbourhood Plan. Such documents include site assessment, the Sustainability Appraisal, the Scoping Report and Flood Risk reports. We have fundamental concerns that the evidence base does not support the NP policies, particularly the policy relating to the allocated site. The various flaws within the evidence base are set out below.

Chalgrove Neighbourhood Development Plan Site Criteria – May 2016

- 3.2 As highlighted in Section 2, when allocating sites within a neighbourhood plan, “*...A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria*” (Paragraph: 042 Reference ID: 41-042-20140306).
- 3.3 The latter of these is set out in the ‘Site Criteria’ document. This document assesses the 11 potential sites for inclusion within the CNP against pre-defined criteria. The criteria includes matters such as deliverability, landscape impact, visual quality, heritage and culture, ecology, transport implications and proximity to village amenities. The Scoping report explains that the criteria were defined through consultation with residents.
- 3.4 The principle of establishing criteria and assessing each of the potential sites against the criteria is supported, as it follows the guidance within the NPPG.
- 3.5 We have a number of substantial concerns with this document, which are discussed below.
- 3.6 The first concern with the assessment is that sites 1, 10 and 11 are assessed as three individual sites. However, from relatively early in the CNP preparation, these three sites were combined to form a single site at the western end of the village. Despite this, the document provides no assessment of the three combined sites and the cumulative impact of these sites against the criteria. This is a flaw and an omission in the document.
- 3.7 Furthermore, sites 1, 10 and 11 (which could accommodate approximately 80 dwellings) were subject to consultation, assessments and a public vote until mid-2016 when the site significantly changed to form a larger site measuring 19.7ha and which extends away from the village by 1km. This now forms the draft allocated site within CNP. Figure 1 below shows the original site area for sites 1, 10 and 11 and the now allocated sites 1, 10 and 11. The fundamental difference of the sites are clear to see.

Figure: 1 Comparison of sites 1, 10 and 11



- 3.8 The draft allocated site is not included, assessed or referenced at all within the Site Criteria document. However, it forms the only draft allocation within the CNP. The guidance within the NPPG states that sites should be assessed against clearly identified criteria but this has not been the case. Rather, the CNP allocates a site which has not be assessed against the criteria during the site selection process and which was only introduced late in the process, thereby bypassing the original shortlisting of sites and public votes.
- 3.9 This document, forming part of the evidence base does not comply with guidance within the NPPG.

Chalgrove Neighbourhood Development Plan Sustainability Appraisal Environmental Report – April 2017

- 3.10 The summary to this document sets out its purpose, which is to set out '*how the principles of sustainable development have been considered throughout the plan-making process*'. As with the Site Criteria document, we consider the Sustainability Appraisal (SA) to be flawed.
- 3.11 Map 2.1 in the SA is stated on page 10 to be taken from the SODC SHLAA 2013 and added to with the additional potential sites for inclusion in the NP. Map 2.1 includes the 19.7ha site, even though this does not feature within the Site Criteria assessment document. Furthermore, the SHLAA includes 'CHAL1' which is the smaller, original site. The larger 19.7ha site is not included in the SHLAA and at no stage has it been assessed by SODC. This map in the SA is therefore incorrect in stating that the base data is from the SHLAA.
- 3.12 Section 5 of the report sets out the consultation responses from the Environment Agency, Natural England and Historic England. The SA does not state which date they were consulted. However, the Scoping Report sets out a timeframe which suggests that such consultation responses were sought in Autumn 2015, which means it likely refers to the original site size, not the 19.7ha site now forming the draft allocation. No evidence is provided to demonstrate that the Environment Agency, Natural England and Historic England have been consulted on the draft allocation site.
- 3.13 It is noted on page 31 of the Sustainability Appraisal that the CNP group visited each of the 11 potential sites in 2014 and presented findings and assessments to the public in November 2014 and residents were asked to rank the sites by preference. This led to the shortlist of sites 1, 10 and 11 (combined) and site 7. Of course, the combined sites 1, 10 and 11 that were assessed at that time, and which the public voted on, bear very little resemblance to the draft allocation which measures 19.7ha. This is evidenced in Figure 1 of these representations. As such, the draft allocated site has not been subject to the same level of scrutiny as the other sites which have been considered and the draft allocation is not based on any robust evidence or assessment.
- 3.14 During 2016, flood remodelling was undertaken which demonstrated that part of sites 10 and 11 were located within flood zone 3. The SA then notes that as a result of this, sites 1, 10 and 11 were merged and a developable area identified within flood zone 1. It is assumed that it was at this point that additional land was incorporated within site 1, 10 and 11 in order to provide 200 dwellings within flood zone 1. This means that every consultation and assessment undertaken up to this stage on site 1, 10 and 11 are irrelevant and that the new larger combined site 1, 10 and 11 was taken forward with no previous assessment or consideration.
- 3.15 Section 6 of the SA explores reasonable alternatives. However, there has been no assessment undertaken on the option of the original site known as 1, 10 and 11 (i.e. which could accommodate approximately 80 dwellings) and site 7 which can accommodate 120 dwellings. This is a logical alternative to consider as these two sites were the shortlisted sites and would provide the 200 dwellings which are required through the Neighbourhood

Plan. The lack of consideration of this option is an omission and a flaw, especially given that the Pre-submission Neighbourhood Plan set out a scenario whereby both sites could accommodate development.

- 3.16 This scenario is set out in policy H1 – Housing Site Allocations which states “*Should the planning application for Site H1 option B for up to 120 homes be granted approval prior to the NDP being made we would support development of 80-100 homes at Site H1 option A to provide the total proposed level of acceptable growth of 200 homes*”. It is thus a significant flaw that such an option has not been considered.
- 3.17 Tables 6.3 and 6.5 of the SA set out assessments on all potential sites (table 6.3) and a comparison between the two sites of 1, 10 and 11 and site 7 (table 6.5). Table 6.3 attributes separate scores to sites 1, 10 and 11 whereas table 6.5 considers them as a single site. This is not a consistent approach and undermines the assessments undertaken in the document.
- 3.18 In the assessments undertaken in table 6.3, it is not clear whether it is the original site 1, 10 and 11 referred to, or the larger 19.7ha site. Some of the answers between the tables differ for site 1, 10 and 11, which suggests that the two different sized sites have been considered. For example, a criteria within table 6.3 is to ‘ensure that any new development does not place people and property at risk of flooding or exacerbate flood issues’. The score for each site of 1, 10 and 11 was a double positive score. However, for the same criteria in table 6.5, the score for 1, 10 and 11 is negative. This suggests that between these two assessments the different sized sites were considered. This evidence lacks clarity and consistency and fails to comply with guidance in the NPPG.
- 3.19 There is also inconsistency between the two tables in the way that Site 7/H1B is scored. Regarding the same flooding category ‘Ensure that any new development does not place people and property at risk of flooding or exacerbate existing flooding issues’, Table 6.4 provides a score of ‘positive’ to site 7 whereas table 6.5 provides a score of ‘double negative’. Once more this demonstrates the lack of consistency and lack of robustness in the assessments made.

Scoping Report – July 2015

- 3.20 The Scoping Report is dated July 2015 and as such sets out the consultation undertaken, but only until mid 2015. As such there is no clear timeline provided in any of the evidence base documents for the consultation taken after this date.
- 3.21 All references to potential sites within this document show the original site 1, 10 and 11, without the enlargement to form the 19.7ha site. This means that the Scoping Report makes absolutely no reference to the draft allocated site and as such cannot be considered as robust evidence to support the CNP.

Conclusion

- 3.22 The flaws within the evidence base have been assessed. To conclude, a situation has arisen whereby the only site proposed for allocation in the CNP has not been subject to the same site selection process as all other potential sites, and has not been subject to the same consultation. Sites 1, 10 and 11 have increased from a collective size of approximately 2.3ha to 19.7ha at a late stage in the process and the evidence base simply does not support this.
- 3.23 Paragraph 040 of the NPPG requires that “*...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*”. For the reasons set out above, there has been no “*proportionate, robust evidence*” provided, or prepared, to support the draft housing allocation. As it stands, it is therefore considered that the CNP does not sufficiently have regard to national planning policy guidance and thus fails the basic condition requiring the same. In addition the flawed Sustainability Appraisal means that the EU obligations set out in the Strategic Environmental Assessment (SEA) Directive, transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004, have not been complied with and the basic condition is, accordingly, not satisfied.
- 3.24 The flawed Sustainability Appraisal also means that it cannot be demonstrated that the basic condition requiring the plan to contribute to sustainable development has been satisfied.

4. RESPONSE ON SPECIFIC POLICIES OF THE PRE-SUBMISSION VERSION OF THE CHALGROVE NEIGHBOURHOOD PLAN

- 4.1 This Section sets out our comments on several of the proposed CNP policies and supporting text, based on the relevant legal requirements and planning policy context outlined in the previous Sections.

Policy C1 – Development Within the Built-up Area

- 4.2 This policy defines the built up area as “*the boundaries of permanent, non-agricultural buildings located around the edge of the village, where such properties are directly connected to the village’s main, singular form*”.
- 4.3 There is no map provided to visually portray the built-up-area and we consider the definition provided is not sufficiently clear and could be open to imprecise interpretation by the decision maker.
- 4.4 This therefore conflicts with the guidance contained within Paragraph: 041 of the NPPG that “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications...*” A map should be provided to ensure there is no ambiguity.

Policy C2 – Design and Character

- 4.5 This policy sets out design criteria which new developments must abide by. We consider this is overly prescriptive.
- 4.6 The NPPF discusses ‘good design’ in section 7. In particular paragraph 60 states:
- “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles”*
- 4.7 The criteria within Policy C2 attempts to restrict building heights, provides only limited building materials that would be appropriate and defines building lines and boundary treatments. Such requirements fail to allow for originality or initiative through design, contrary to paragraph 60 of the NPPF.
- 4.8 To rectify this non-compliance, we suggest that the requirements within the policy are removed, or they are downgraded to design guidelines rather than requirements in order to allow for design initiative in accordance with national policy.

Policy H1 – Housing Site Allocations

Housing Requirement

- 4.9 As highlighted in Section 2, there is no legal or policy requirement for the CNP to be examined against the policies in an emerging Local Plan. It is only necessary to demonstrate that the CNP is in general conformity with the strategic policies of the adopted local plan, although the evidence base for the emerging Local Plan is still likely to be relevant in terms of informing the strategy.
- 4.10 The NPPG also advises that, where a Neighbourhood Plan comes forward before an up-to-date Local Plan is in place, the neighbourhood plan should “*deliver against the objectively assessed evidence of needs*” (Paragraph: 04; Reference ID: 3-040-20140306). In order to comply with the first basic condition, the housing strategy proposed must therefore seek to deliver against SODC’s objectively assessed evidence of needs.
- 4.11 SODC’s latest evidence on housing need is set out within the Oxfordshire SHMA (2014). The SHMA sets out an OAN for the district, which is a range between 725-825dpa. As the SHMA provides no breakdown in figures within the District, the CNP has therefore adopted the emerging Local Plan figure of 200 dwellings for Chalgrove (as set out in table 5g of the Second Preferred Options Local Plan). It should be noted that the emerging Local Plan suggests that larger villages increase by 15%, which actually provides a figure of 236 dwellings for Chalgrove. The emerging Plan states that only the 200 dwellings are required due to the proposed strategic allocation at Chalgrove Airfield. However, due to the current stage of the Local Plan, and the requirement for it to be examined, the draft allocation cannot be assumed to be final. If the Airfield was removed as a strategic allocation, the number of dwellings required to be accommodated within Chalgrove would therefore increase to 236 dwellings. This would mean that the CNP did not accommodate for all necessary dwellings.
- 4.12 Furthermore, we have significant concerns regards the proposed housing targets set out in the emerging Local Plan; however it is acknowledged that this is a matter for the Local Plan Examination rather than the CNP. Without prejudice, the comments contained herein are therefore based on the proposed target of 200 dwellings within the CNP. As, according to the timeframe of the CNP group, they anticipate that the CNP will be made prior to the Local Plan being adopted however, it would be very unfortunate if a subsequent increase in housing numbers allocated to Chalgrove in the Local Plan was to render the CNP out-of-date very shortly after it was made.

Site Allocation

- 4.13 This policy sets out the draft allocation at Site G1A (Marley Lane) for 200 dwellings. We have already set out in detail the flaws in the site selection process and the lack of robust evidence which supports this allocation.

- 4.14 Whist this is not a substantial point, two paragraphs within the supportive text to policy H1 are duplicated (starting with “*To demonstrate how this site will be developed in accordance with the NP policies on design...*”). One of the paragraphs should be deleted.
- 4.15 The final paragraph of supportive text states that the proposal to allocate Site H1 Option A (formerly known as sites 1, 10 and 11) was identified through a public meeting in October 2016. It is imperative to note that this public event was the first time the enlarged site had been introduced to the public and it had not progressed through the site selection process with assessments against criteria and early public consultation. There is some doubt as to whether members of the public were fully aware of the extent that the site had changed at this public consultation event. The earlier stages of assessments and consultation should have been undertaken on the new enlarged site to ensure that a robust process has been followed and to ensure there has been sufficient consideration of the potential impacts of the site.
- 4.16 Site specific criteria for the draft allocated site are also provided as a sub-category to Policy H1 and are set out on page 27 of the CNP. These criteria simply relate to the proposed Masterplan as submitted with the planning application at Land West of Marley Lane. We have a number of concerns regarding the draft allocated site. These are briefly set out below as we consider them material considerations in the appropriateness of the site for allocation.
- Integration with Chalgrove: from a mid-point of the site, there is a 1km distance to reach the village store, post office or village hall. However, it must be taken into account that proposed dwellings towards the west of the site would be approximately 1.6km from services such as the post office. This undermines the integration of the site with the remainder of the village;
 - The site extends 1km away from the village, thereby elongating the village of Chalgrove significantly. This fails to ensure that the local distinctiveness of the village is maintained through the allocated site and fails to adhere to the setting of Chalgrove;
 - South Oxfordshire District Council commissioned a Landscape Capacity Study, including a further document entitled ‘Landscape Capacity Assessment for Sites on the Edge of the Larger Villages’. These studies assess the ‘original’ Marley Lane site but no further assessment has been undertaken on the current application site which has increased in size to 19.7ha. The potential landscape impact of this site, which encroaches into the countryside, is substantial and yet the Council’s own Landscape Study has not assessed this;
 - The development would result in the loss of a significant amount of vegetation and hedgerows throughout the site which would erode the rural character of the site. This would substantially alter the character of the site and be harmful to the wider area;
 - The scheme would result in a significant re-alignment to the western end of the High Street. The extent of the alterations can be seen on drawing number TE/1291/320A,

submitted within the Road Safety Audit with the planning application for the development of the site. However, other than this drawing, limited information has been provided to demonstrate what works this would involve and how disruptive this would be to residents of Chalgrove. The alterations to the road layout will require a stopping up application, which is likely to lead to some delay before works can commence. It is likely that services and utilities run under the High Street, and the alteration to the layout of the road will require the realignment of these utilities/services. We also consider that the extent of road realignment will have significant impacts on the landscape and the setting of the site and the village.

- 4.17 We consider the concerns above to be highly important, and the concerns solely relate to the 19.7ha site, whereas they may not have been relevant for the original sites 1, 10 and 11. As such, this highlights the need for a robust assessment to be undertaken on the larger site. However, this has not been forthcoming and instead the site forms the draft allocation without any robust assessment having been undertaken. This fails to comply with the NPPF's requirement for '*proportionate and robust evidence*'.

Policy H3 – Home Working

- 4.18 This policy is not specific to Chalgrove and duplicates existing Core Strategy policy CSEM1 (Supporting a successful economy). It should therefore be deleted.

Flooding – Supporting Statement

- 4.19 The CNP does not include a policy on flooding, as ultimately it is the responsibility of the Environment Agency. Therefore, the supporting statement simply states that "*development will only be permitted where it can be demonstrated that the site is not subject to flooding or likely to add to flooding problems in the village*". This appears at odds with the draft allocated site, of which 59% of the entire site is within flood zones 2 and 3. It cannot be demonstrated therefore that the site does not flood. This simply adds to the arguments already raised within these representations that the draft allocation is not based on robust consideration of criteria.

Supporting Statement – Business Development

- 4.20 This supporting statement sets out that business uses at an appropriate scale will be encouraged.
- 4.21 Emerging Policy EMP1 of the SODC Second Preferred Options Local Plan includes a requirement for Chalgrove (through its NP), to identify an employment area of 2.25ha. The CNP has not done this.
- 4.22 As highlighted previously, there is no legal or policy requirement for the CNP to be examined against the policies in an emerging Local Plan. It is only necessary to demonstrate that the CNP is in general conformity with the strategic policies of the adopted local plan. That said, it would be unfortunate for the made CNP to become out-of-date as soon as the Local Plan were adopted.

4.23 We suggest therefore that the CNP seeks to identify potential employment space.

Supporting Statements

- 4.24 Supporting statements, rather than policies, are provided in relation to flooding, biodiversity, heritage assets, archaeological sites and business development. The CNP notes that such statements are provided when there are no commensurate policies for those topics.
- 4.25 It is not clear what weight these supporting statements should be given in the decision making process. They clearly should be given less weight than the proposed policies, but then it is not clear how they should be applied.
- 4.26 The NPPG Paragraph: 041 of the NPPG that “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications...*” Unfortunately this is not the case for these supportive statements. We suggest that either they are deleted or formed into relevant polices in order to comply with national policy.

5. LAND EAST OF CHALGROVE

- 5.1 Land east of Chalgrove, also known as CHAL 7 or, within the Pre-submission CNP, H1 option B was one of the two shortlisted sites for inclusion within the CNP. However, it does not form an allocated site.
- 5.2 A planning application (ref: P16/S4062/O) for up to 120 dwellings was recommended for approval at Planning Committee on 24th April 2017 but was overturned by members and refused on three grounds. Two grounds relate to the lack of a signed S106 agreement and the other relates to the impact on the countryside and village, which we consider unfounded with scope to overcome the concerns.
- 5.3 This section sets out a brief overview of the site, and raises a number of concerns we have with the assumptions made during the site selection process.

Site Context

- 5.4 The site comprises 7.45ha of land located to the south-east side of Chalgrove at the edge of the village, within the administrative boundary of South Oxfordshire District Council. The site itself is bounded by houses from Farm Close and Chiltern Close to the west, the B480 to the north, The Grange of Berrick Road to the south and agricultural land to the east.

Policy Designations

- 5.5 In planning policy terms the site is located on the edge of the settlement of Chalgrove. It does not fall within any policy designation such as Green Belt or Area of Outstanding Natural Beauty (AONB) and as set out in SODC's recent Landscape Capacity Assessment, the site is of low landscape value, its character is influenced by modern housing to the west and has a high capacity to accommodate housing development.

Site Description

- 5.6 The site comprises of one field which is currently used for arable farming. The site is bordered by a tree belt along the eastern boundary of the site as well as a fence separating the field to the B480. Hedges separate the houses and gardens of Farm Close and Chiltern Close to the west and the Grange of Berwick Road to the south.
- 5.7 Topography within the site slopes upwards to the north of the site away from a brook which is located along the southern boundary and which runs through the centre of the village.

Neighbourhood Plan Site Assessment

- 5.8 Section 3 of these representations have set out our concerns with the site selection process and with the documents which form the evidence base for the CNP. In addition, our response to Policy H1 (the allocated site) sets out the concerns we have with the allocation of that site. These matters shall not be repeated again.

- 5.9 It is, however, pertinent to comment upon the specific site assessments, as set out in Section 6 of the SA, particularly the assessment in table 6.5. A number of criteria have been identified here and site H1 option B has been attributed a range of scores (including positive, neutral and negative). There are a number of scores which we do not agree with and where it is not clear how such judgement has been made.
- 5.10 Table 6.5 directly compares sites 1, 10 and 11 to site 7. Whilst we are only commenting on the judgements made in relation to site 7, this does not mean that we support the judgements made in assessment to sites 1, 10 and 11. Where relevant, we have referred to information submitted with the planning application and consultation responses in order to provide additional information to help inform the CNP when making the necessary alterations to the plan prior to submitting it to SODC. While it is appreciated that some decisions were made before the planning application was submitted for both sites, new evidence can now be used to help inform a final assessment on both sites, especially as the site selection process is so flawed.

Table 1 – Analysis of CNP Table 6.5

Sustainability Objectives	Score	Comments	Suggested Score
Ensure development provides the number, type and tenure of homes that the community needs, while maximising those opportunities for those with local connections	+	We agree with the score attributed here	+
Identify suitable development sites for a minimum of 82 homes initially, changed to 200 following the SHMA	+	We agree with the score attributed here	+
Ensure that any new development does not cause or exacerbate road safety issues, including safe parking	--	Site 7 would not give rise to any safety issues. A roundabout from the B480 would ensure safe access for vehicles. There would also be pedestrian access from the south-west corner of the site and incorporate two zebra crossing leading directly from the site to the northern side of Monument Road. Oxfordshire County Council (OCC) confirmed through their consultation response to the application that they have no objection to the proposals and are satisfied that both accesses would provide safe access into the site. There is sufficient space on site to provide adequate levels of	+

		<p>parking. The planning application proposed 309 parking spaces, compared to the 267 spaces required by OCC. The score of double negative is therefore unjustified.</p>	
Ensure footpaths and cycle paths are provided and retained wherever possible	--	<p>It is unclear how a double negative score has been provided here given that the existing footpath running along the south of the site would be retained and enhanced with improved surfacing. This would be a direct improvement on the current situation. This footpath links the village to the wider countryside. In addition, pedestrian/cyclist access could be provided to the north of the site, with a pavement along the B480 to ensure safe access to the village. These accesses were shown in the planning application, and raised no objections from any consultees.</p> <p>It should be noted that table 6.3 of the SA attributes site 7 a positive score regarding this same criteria.</p>	++
Ensure that any new development does not place people and property at risk of flooding or exacerbate existing flooding issues	--	<p>A score of double negative is simply incorrect in this case. The location of the site to the top of the village allows a unique opportunity to reduce flood risk within Chalgrove village. SUDs would be used to hold back water during times of flooding, thereby reducing the quantity and velocity of water within Chalgrove Brook. This would reduce the risk of flooding downstream during periods of heavy rainfall. During the application stage, the Environment Agency and the Council's drainage officer have raised no objection to the proposals.</p>	++
Encourage the use of sustainable urban drainage systems	0	<p>The site has the potential to incorporate a range of SUDS, including attenuation basins, swales and permeable paving and therefore should be attributed a greater score than neutral. SUDS were shown within the planning application (including attenuation tanks, swales and permeable paving) and no objections were raised from specialist consultees. In regards to the sites ability to meet this sustainability</p>	++

		objective, we consider this should be attributed a double positive.	
Conserve and enhance the water environment	0	We agree with the score attributed here as the opportunities to enhance the water environment has not yet been assessed.	0
Avoid low density development	0	It is not clear from this criteria what constitutes low density development as the definition is ambiguous. The application on this site demonstrated that 120 dwellings can be provided at a density of 29dph. Given that SODC Core Strategy policy CSH2 requires developments not to have a density of lower than 25dph, it is considered that the site clearly has the ability to avoid low density development and should be attributed positive scores. At the same time, to ensure that the development is in keeping with Chalgrove, the density of 29dph is similar to the densities within the village.	++
Ensure developments are safe and integrated into the community	-	This site would have safe access into the village which would integrate the site with the village. While there is only one vehicular access into the site from the B480, there is an existing footpath running along the south of the site which would provide pedestrian/cycle access into the village (this access will be discussed elsewhere in these representations). This existing access, which would be improved by a new surface, coupled with the proximity of the site to key services within the village render this site capable of being safe and well-integrated with the village.	+
Ensure developments have access to local services	0	The site would provide easy access to local services through either the pedestrian/cycle routes from the north of the site, or the existing route along the south-west of the site. From the middle of the site, services such as the school, post office, pubs and village hall range in distance from 705-865m away, which is within easy walking distance. This criteria should not be given a neutral score, but a	+

		positive score.	
To continue to provide and protect open spaces and sports recreation facilities and provide additional facilities where possible	0	The development of this site would have no impact on the existing public open space within Chalgrove. In addition, the site has the potential to provide new public open space and provide children's play space. The recent application demonstrated that 2.7ha of open space could be provided along with a number of children's play spaces. As such, the site is clearly capable of meeting this sustainability objection and should be attributed a positive response.	+
Detailed developer drainage strategies to be produced and agreed in liaison with Thames Water; with infrastructure in place prior to development being occupied	0	We agree with the score attributed here. While my client could commit to agreeing a drainage strategy with Thames Water, this cannot be determined until later in the planning process.	0
Ensure that new development is of a high quality design and reinforces local distinctiveness	0	We agree with the score attributed here as this criteria cannot be ensured until a later stage in the planning process.	0
Encourage renewable energy technologies within new development wherever possible	0	The site is capable of using renewable energy technologies. The use of such technologies would be determined at a more detailed stage in the planning process. However, at this stage we agree with the score.	0
Conserve and enhance biodiversity and encourage the provision of new habitats	+	The site provides ample opportunity to maintain and enhance biodiversity. An ecology assessment has been taken for the site, which noted that the ecological value within the site was limited to the vegetation around the boundaries. This vegetation would be retained and there would be opportunities to enhance the ecology and biodiversity through positive management of existing vegetation and the planting of native trees and hedgerows.	++
Conserve and enhance the heritage of Chalgrove, including	0	The allocation/development of this site would have no impact on heritage assets within Chalgrove. Similarly, regarding archaeology, it	0

archaeological heritage		was determined by the OCC archaeologist that there would be no adverse impact. While there would be no adverse impacts on heritage or archaeology, the development of the site would not be enhanced and we therefore agree with the natural score given.	
-------------------------	--	---	--

- 5.11 As is demonstrated in the table above, we disagree with the scores attributed to site 7 and in many places consider the site to have been marked down based on incorrect assumptions. The final column in the table provides a more accurate score for the site. In some places, where the assessment is simply incorrect, such as a double negative in response to flood risk, we suggest that the CNP Steering Group look at evidence, and responses from OCC in order to accurately assess this matter. At present, we do not consider that the assessment of site H1 option B is a fair portrayal and some of the assessments certainly do not appear to be based on a robust evidence base.
- 5.12 Table 6.6 of the SA sets out a summary of reasons for why sites 1, 10 and 11 form the draft allocation, in comparison to H1A Site 7. This is below, with our commentary on the conclusions reached. It should be noted that these comments refer specifically to the two applications submitted for the sites, rather than being based on the assessments carried out as part of the CNP preparation, presumably because there has been no assessment undertaken on site H1A combined sites 1, 10 and 11.
- 5.13 Please note that table 6.5 defines the site as Option H1B whereas table 6.6 refers to the same site as HIA b site 7. Whilst this lacks consistency, both references refer to the same site.

Table 2 – Analysis of CNP table 6.6

HIA combined sites 1, 10 and 11	H1A Site 7	Our comments
The site is a natural approach to the village. The proposed 2 vehicular entrances on to the B480 and sufficient vehicular and pedestrian entrances on to the High Street will provide easy access to the village facilities. Development on this site will be more easily	The site is isolated from the village with one vehicular access on to the B480 and one additional footpath proposed. The footpath comes out on to a dangerous bend; the proposal to have pelican crossings at this point is not supported by the Parish Council or the CNDP. Due to its isolated	There is no evidence to support the assumption that the existing footpath is located on a 'dangerous bend', other than public perception. There is a good safety record of the local highway network at this point and only light pedestrian and vehicular traffic flows. As part of the planning application for the site, speed surveys were undertaken along this part of the road which revealed that no cars exceed the speed limit. Nonetheless, in light of the concerns raised, the planning application proposed two zebra crossings to provide safe access. OCC raised no

integrated into the village and will therefore be more sustainable	location and lack of pedestrian access development on this site could become an isolated community with very limited interaction with the village, with residents simply driving out onto the B480 and away, will therefore be less sustainable.	concerns to this suggestion, and have not highlighted any concern with the safety of crossing here. The proximity of the site to key facilities and services must also be considered. Bus stops are 30m away on Monument Road, and services such as the post office and village hall are only 705m away. The majority of key facilities are significantly closer to H1A site 7 than they are to 1, 10 and 11.
3.6 hectares of the 8 hectares proposed for the development is unused land owned by the MOD	All of the proposed site is agricultural land	It is clear from the evidence base (for example page 36 of the SA) that none of the potential sites for inclusion within the CNP are classified as high agricultural value.
Proposed open space is 10 hectares of riverside meadow. In addition, the lower housing density allows more open space to be included in Flood Zone 1 particularly the play areas which can then be more accessible to proposed housing.	Proposed open space is 2.7 hectares	H1A site 7 is 6.4ha in size (or 7.4ha in the application due to the inclusion of highways for off-site works). In accordance with SODC Planning Obligations SPD (2016), 0.74 ha of open space is required. The site is clearly over providing by over 3x the required quantity. The open space would also be excellent quality which could be used all year round. While 10ha of open space is proposed within H1A site 1, 10 and 11, this open space would be located within flood zones 2 and 3 and for significantly parts of each year would be waterlogged and unusable. The amount of open space should not undermine the quality and usability of the open space, yet the assessment does not take this into consideration in the slightest.
Benefits of larger open space are: i) It results in a less cramped housing layout ii) It encourages a healthy lifestyle with a spacious area for walking, jogging, fitness stations, and cycling iii) It provides a significant area for increasing biodiversity within the application site iv) It enhances the setting of the ill-defined Shakespeare's Way, a National Trail		i) the amount of open space in H1A combined sites 1, 10 and 11 does not result in a less cramped development. The 10ha of open space is located at the south of the site within the flood zones. This leaves all 200 dwellings to be located in an area which equates to only 40% of the site. The Design and Access for the site notes that densities will reach 45dpa, which is wholly out of

v) It separates the proposed housing from the open countryside beyond the Chalgrove Brook, which reduces the landscape and visual impact of the proposals on the surrounding area	<p>keeping with Chalgrove.</p> <p>ii) Once again it is imperative to note that the 10ha of open space will not be useable during times of heavy flooding due to its location within flood zones 2 and 3. This will not contribute to the object to encourage a healthy lifestyle. The existing public footpath along the south of site 7 would be retained and improved and it leads into the countryside to the immediate east of the site. This would encourage walking and cycling.</p> <p>iii) While there may be some scope to improve biodiversity within the 10ha of open space, this will be limited due to the high likelihood of it to flood. Ecological enhancements are possible through H1A site 7, but it appears such opportunities have not been factored into this site comparison exercise.</p> <p>iv) the Shakespeare's Way trail does not run through site 7 so the use of this in site comparisons is wrong.</p> <p>v) we would not consider the 10ha of open space a 'beneficial' buffer between housing and the countryside, we would consider it an absolute necessity. The development would take the form of ribbon development and significantly extend Chalgrove village by encroaching into the countryside. In fact, the proposed development spreads west from the village by approximately 1km and contains no natural buffer to either the south or west. The open space is therefore fundamentally necessary to attempt to protect the setting of Chalgrove from the surrounding countryside.</p> <p>H1A site 7 does not require such a buffer. The site extends no further east from Chalgrove Village than the existing tree belt along the eastern elevation of the site and is located adjacent to the Grange along the southern boundary and dwellings along the western boundary. The existing tree belt provides a natural</p>
---	---

		<p>buffer which protects the views of the site and the village from the countryside.</p> <p>The consideration of both sites here does appear to skew the results in favour of the draft allocated site and we are not satisfied that an impartial or fair comparison has been undertaken.</p>
Flooding - Sites 1,10 and 11 are downstream from the village any run off will have less impact	Flooding - Site 7 is upstream from the village any run off will have greater impact	<p>These conclusions are very basic and miss the opportunities for improvement that can arise.</p> <p>The position of site H1A 7 upstream from the village provides an opportunity to reduce flood risk within the village. The proposed drainage system (which is supported by OCC) incorporates Sustainable Drainage Systems (SUDS) (including swales, attenuation basins and tree pits). These will capture and store rainfall runoff across the site until it is released slowly into Chalgrove Brook. The slow release of runoff from the site would reduce the speed and volume of water in Chalgrove Brook, thereby reducing the risk of flooding within the village.</p>

- 5.14 Table 2 above, and the extent of assessment and justification of choice of the preferred site, demonstrates the overall approach to site selection within the CNP, which is wholly flawed and lacks robustness. The outcome and assessments made are highly simplistic and appear to skew the outcome towards the draft allocated site. This is inappropriate given the site selection process has not been followed for the enlarged sites 1, 10 and 11.
- 5.15 Once more, such assessments demonstrate that the evidence base for the CNP is flawed and not robust or proportionate. As such the CNP fails to comply with national guidance and as such does not comply with the basic conditions.

6. SUMMARY AND CONCLUSIONS

- 6.1 These representations have been prepared by Boyer on behalf of Wates Developments Ltd in response to the Regulation 14 Pre-submission Consultation of the Chalgrove Neighbourhood Plan, as prepared by Chalgrove Parish Council.
- 6.2 For the reasons detailed within the preceding sections, it is concluded that the making of the CNP will not meet the basic conditions.
- 6.3 It is concluded that too many of the policies contained therein do not have appropriate regard to national policies. Overall we have concerns with 4 out of 10 of the policies and all five supportive statements. Some of these policies we have suggested should be amended, and some deleted in their entirety.
- 6.4 The main issues identified in these representations are as follows:
 - Fundamental flaws in the evidence base underpinning the site allocation within policy H1 with a lack of evidence supporting the draft allocated site;
 - Assumptions made during the site selection process which have skewed the final selection of sites, specifically in relation to H1A site 7; and
 - A number of draft policies do not have sufficient regard to national policy and should be amended, either in relation to their content or their status in order to avoid ambiguity and in order to ensure compliance;
- 6.5 Given the concerns raised herein regarding the suitability of the submitted evidence base for the proposed site allocation, it is considered that it would be inappropriate to submit the CNP to SODC at this time due to the lack of "*proportionate, robust evidence*" upon which to base such a submission. The lack of evidence supporting the CNP means that the CNP fails the basic condition requiring sufficient regard to national planning policy guidance. The CNP, as currently prepared, will also breach EU obligations and not provide for or contribute to sustainable development. The corresponding basic conditions are also, therefore, not satisfied.
- 6.6 Given the fundamental flaws with the CNP's preparation to this point the whole site selection process and sustainability appraisal need to be undertaken again. Only then will it be possible for a new pre-submission draft CNP to be prepared, which we are confident should provide for the allocation of Wates Developments Limited's site.

APPENDIX ONE – SITE LOCATION PLAN: LAND EAST OF CHALGROVE

1:1000

NOTES:

DO NOT SCALE. USE FIGURED DIMENSIONS ONLY.
 All dimensions to be checked on site.
 All drawings to be read in conjunction with engineer's drawings. Any discrepancies between consultants drawings to be reported to the Architect before any work commences.
 The Contractor's attention is drawn to the Health & Safety matters identified in the Health & Safety plan as being potentially hazardous.
 These items should not be considered as a full and final list.
 The Work Package Contractor's normal Health & Safety obligations still apply when undertaking constructional operations both on and off site.
 Ayre Chamberlain Gaunt take no responsibility for the location of legal boundaries indicated on this drawing and advise a separate drawing be completed by a specialist surveyor in order to establish exact boundaries.
 DWG files provided for information only. Refer to PDF record.
 The copyright of this drawing is held by Ayre Chamberlain Gaunt Ltd. Not to be used for any purpose without consent.

SITE BOUNDARY

ACGARCHITECTS.CO.UK

Ayre Chamberlain Gaunt
 14a London Street
 Basingstoke
 Hampshire, RG21 7NU
 +44 (0)1256 411 450
 mail@acgarchitects.co.uk

**AYRE
CHAMBERLAIN
GAUNT**

PROJECT

LAND EAST OF CHALGROVE
 CHALGROVE

DRAWING TITLE

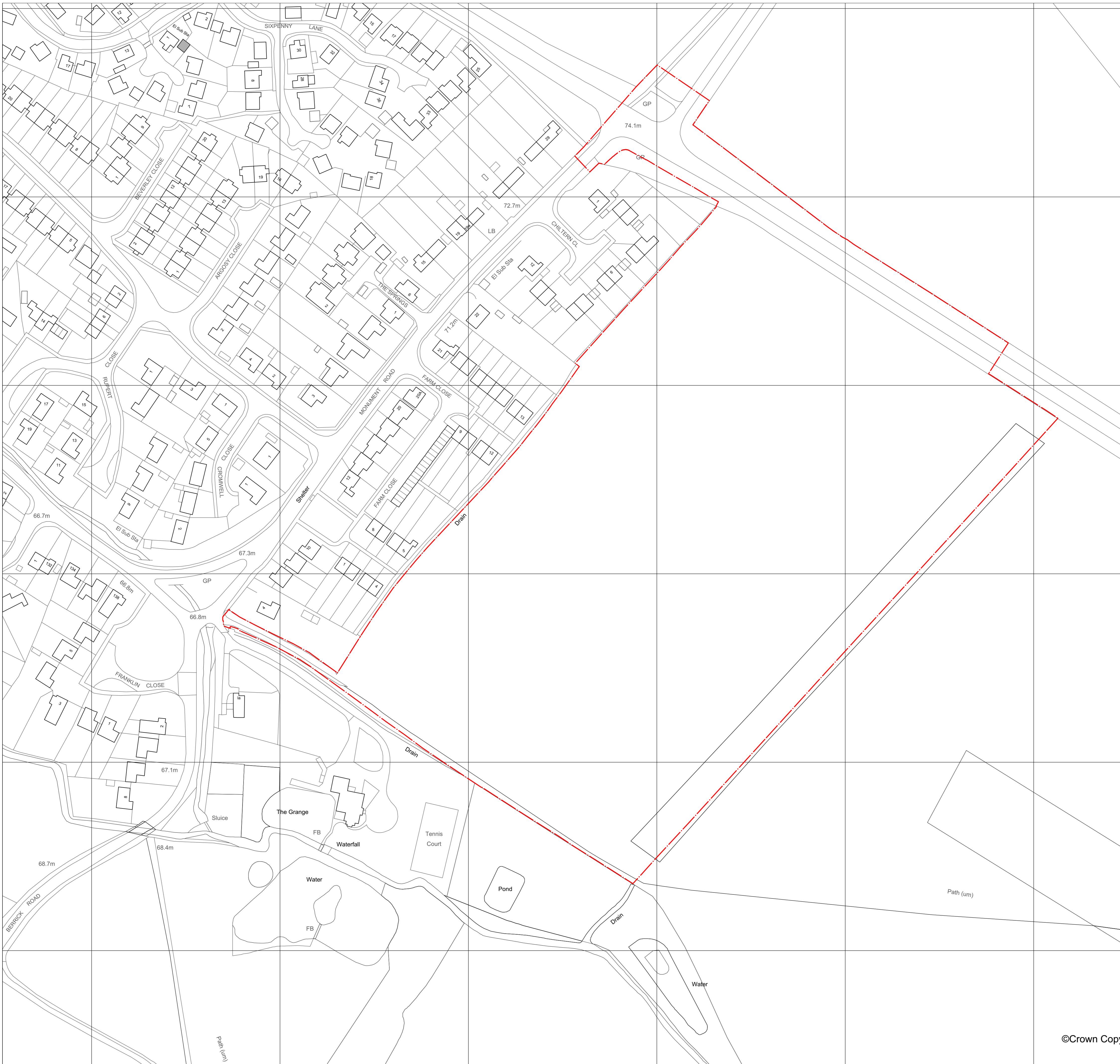
EXISTING LOCATION PLAN

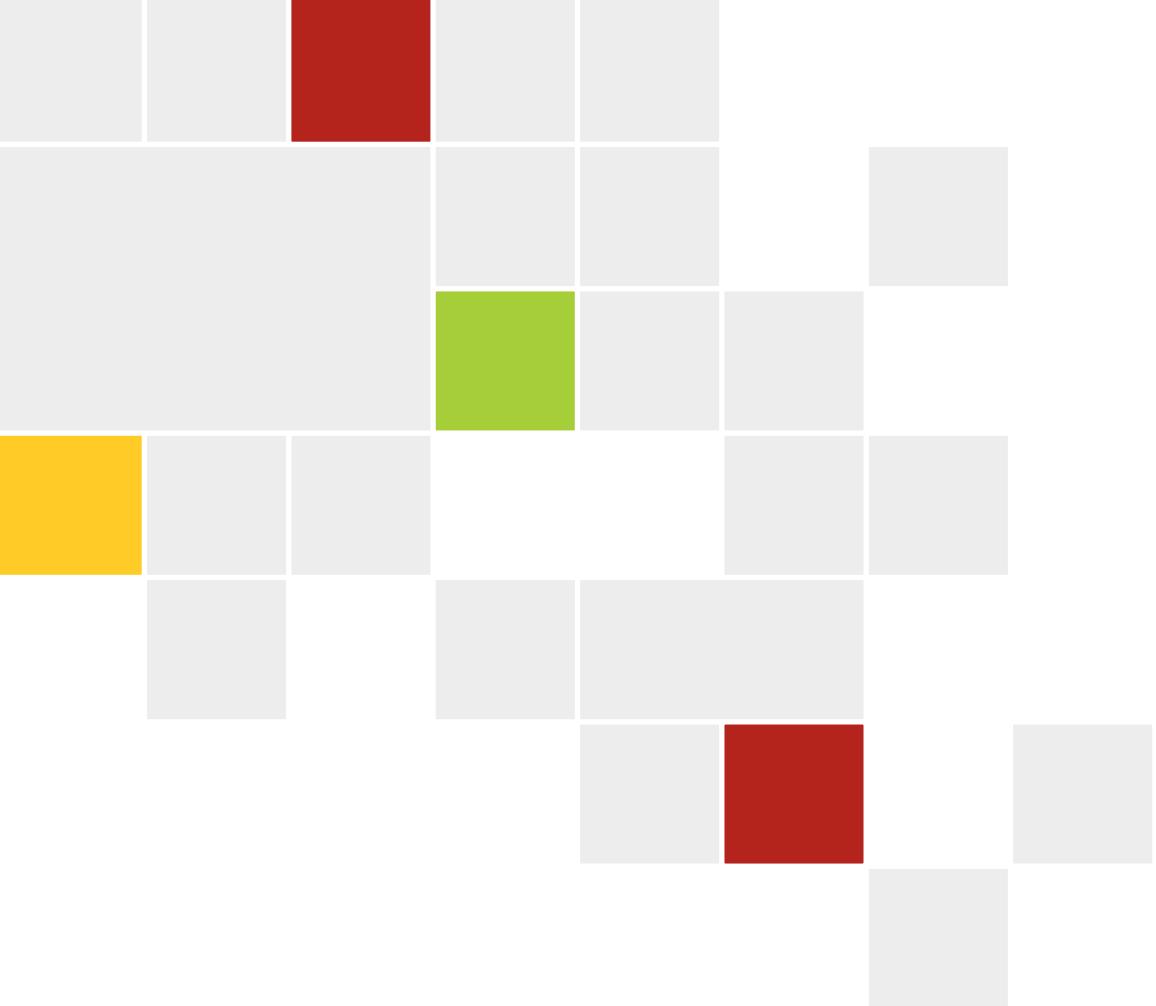
REV	DATE	NOTES
A	7/1/16	OUTLINE PLANNING APPLICATION

DRAWN BY	CHECKED BY
RB	DA

JOB NO.	STATUS
227	PLANNING

DRAWING NO.	REV
227_PLN_001	A





Boyer

Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

Planning services

HEAD OF SERVICE:ADRIAN DUFFIELD



Listening Learning Leading

Jo Murphy

By email only:

info@chalgrove-parish.org.uk

Cc: Jacky Nabb

jackynabb2@aol.com

Contact officer: Hannah Guest

hannah.guest@southandvale.gov.uk

Tel: 01235 422600

Textphone users add 18001 before you dial

5June 2017

Dear Ms Murphy

Chalgrove Neighbourhood Development Plan - Pre-Submission Consultation

Thank you for giving the Council the opportunity to comment on your NDP.

Having now seen a complete draft, along with some of the evidence, we are able to offer formal advice compiled from across the Council, under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Section/Policy	Comment	Recommendation
1 1.0 Introduction <u>Paragraph 6</u> Once the Plan has been made (following a successful referendum) the CNDP will from part of South Oxfordshire District Council's Local Plan.	<u>Paragraph 6</u> The South Oxfordshire District Council's local plan is one of a series of documents which alongside neighbourhood plans forms part of the Development Plan for the District.	<u>Paragraph 6</u> Amend text to read: Once the Plan has been made (following a successful referendum) the CNDP will from part of South Oxfordshire District Council's Development Plan.
2 3.1Setting the scene <u>Paragraph 3</u> The village architecture reflects its history. Although there are many modern buildings, there are also 35 listed buildings within the village, a much higher figure than villages of the same size.	<u>Paragraph 3</u> The Council's Conservation Officer has advised that 35 listed buildings in a village the size of Chalgrove is average in terms of villages within South Oxfordshire.	<u>Section 3.1/Paragraph 3</u> Delete end of sentence to read: The village architecture reflects its history. Although there are many modern buildings, there are also 35 listed buildings within the village.
3 Table 1 – List of Policies and Supporting Statements	<p>Policy C2 that requires development proposals to reflect and enhance the character of Chalgrove, reinforce local distinctiveness and create a sense of place will also help deliver objective 1.</p> <p>Policy H1 that allocates land to the West of Marley Lane for 200 dwellings will also help deliver objective 4.</p>	<p>Insert 'C2 – Design and Character' into column adjacent to objective 1.</p> <p>Insert 'H1 – Housing Site Allocation' into column adjacent to objective 4.</p>
4 Policy C1 – Development Within the Built-	<u>Paragraph 1</u>	<u>Paragraph 1</u>

<p>up Area</p> <p><u>Paragraph 1</u></p> <p>Within the built-up area of Chalgrove and/or sites allocated for development in policy H1 applications for development will normally be permitted, provided, the development conforms to other policies in this Plan</p> <p><u>Justification</u></p> <p><u>Paragraph 1</u></p> <p>It is important to maintain the form and character of the village and to ensure that new development does not compromise this. The policy does not define a boundary on a plan but is descriptive. It also does not restrict development on the edge of the built up area if this is in keeping with the village character. The policy makes it clear that infill development within the built-up area should not normally be an issue provided it conforms to other policies in the Plan.</p> <p><u>Paragraph 2</u></p>	<p>To ensure that this policy is not considered 'out-of-date' on adoption of the South Oxfordshire Local Plan, the policy should refer to sites allocated within the South Oxfordshire Local Plan as well as the CNDP.</p> <p>'Normally' and 'not normally' introduces a vagueness which doesn't fit with the legal prominence given to planning policies when making decisions. The word makes it difficult for decision makers to apply the policy consistently.</p> <p><u>Justification</u></p> <p><u>Paragraph 1</u></p> <p>It is important that neighbourhood plans use positive language to ensure that changes which could improve and enhance the neighbourhood plan area are not discouraged.</p> <p><u>Paragraph 2</u></p>	<p>Within the built-up area of Chalgrove and/or sites allocated for development in policy H1 of the CNDP and/or the South Oxfordshire Local Plan applications for development will be supported.</p> <p><u>Justification</u></p> <p><u>Paragraph 1</u></p> <p>Amend text to read:</p> <p>It is important to maintain and/or enhance the form and character of the village and to ensure that new development contributes to this. The policy does not define a boundary on a plan but is descriptive. It also does not restrict development on the edge of the built up area if this is in keeping with the village character. The policy makes it clear that infill development within the built-up area should not normally be an issue provided it conforms to other policies in the Plan.</p> <p><u>Paragraph 2</u></p>
--	--	--

	<p>The aim is to encourage small scale development that does not extend development into the open countryside in a manner or form that will compromise its setting as a village in the open countryside. Development within the village (provided it accords with other policies) can help to promote community cohesion. This does not mean that the conservation area or historic fabric of the village can be compromised.</p>	<p>You identify later in the plan that some existing community facilities, such as the post office, have been at risk of closure. New development within the village can also help to support existing facilities.</p>	<p>The aim is to encourage small scale development that does not extend development into the open countryside in a manner or form that will compromise its setting as a village in the open countryside. Development within the village (can help to promote community cohesion and support existing facilities. A careful balance should be pursued to ensure that the conservation area or historic fabric of the village is not compromised.</p>
5	<p>Policy C2 – Design and Character</p> <p><u>Final paragraph</u></p> <p>All proposals must protect and enhance views into and out of the village, set out on Map 2, and have sensitivity to preserving the views to and from the AONB.</p> <p><u>Justification</u></p> <p><u>Paragraph 3</u></p> <p>A policy on design is considered essential to manage both the allocated sites and any small-scale proposal including redevelopment of a single house on a large plot into multiple housing. This</p>	<p><u>Final paragraph</u></p> <p>For reasons of clarity state where Map 2 is located within the document.</p> <p>It is only appropriate to use 'must' where the requirements of the policy are compulsory in all circumstances. When dealing with the protection of views the use of must may be considered overly restrictive and unduly onerous.</p> <p><u>Justification</u></p> <p><u>Paragraph 3</u></p> <p>The National Planning Policy Framework clearly states that "planning policies and decisions should not attempt to impose architectural styles or particular tastes". It is not clear what you mean by a 'traditional approach', and although this is set out in your justification this could be considered as not</p>	<p><u>Final paragraph</u></p> <p>Amend text to read:</p> <p>All proposals should protect and enhance views into and out of the village, set out on Map 2 (overleaf), and have sensitivity to preserving the views to and from the AONB.</p> <p><u>Justification</u></p> <p><u>Paragraph 3</u></p> <p>Clarify what is meant by a 'traditional approach'. If the objective of this sentence is to require a traditional building style then remove the sentence.</p>

	<p>policy is not intended to create a copybook approach to design or limit innovation in the type or range of development. Any departure from the traditional approach where this is identified as important within a character area will need to demonstrate why this should be set aside.</p>	<p>having regard to national policy. You should consider whether the NDP would be raising unrealistic expectations within the community.</p>	
6	<p>5.3 Housing – Introduction</p> <p><u>Paragraph 3</u></p> <p>The emerging Local Plan Preferred Options 1 indicated that the village could plan for an increase of 10% on current stock plus 82 identified in the Local Plan giving a suggested allocation of 193.</p>	<p>The introduction to the housing section only refers to housing site allocations (Policy H1) and does not make reference to any of the other policies set out in this section, e.g. H2 – Dwelling Mix, H3 – Homeworking etc.</p> <p><u>Paragraph 3</u></p> <p>For reasons of clarity the submission plan should refer to the Preferred Options 2 consultation and the expected housing numbers (15% growth).</p> <p>It would also aid understanding to clarify that the initial 82 were identified in the Core Strategy rather than the Local Plan so that people do not confuse the Core Strategy allocation with the emerging Local Plan.</p>	<p>Introduce the other policies in this section.</p> <p><u>Paragraph 3</u></p> <p>Amend text to read</p> <p>The emerging Local Plan Preferred Options 2 consultation document indicated an expected level of growth for the village of 15% resulting in 236 houses over the plan period. However, Chalgrove is also identified as a community where a strategic allocation has been made (Chalgrove Airfield) and subsequently while the plan provides a number for the neighbourhood plan to use as a starting point it does not require the village to deliver any additional development beyond the</p>

	<p><u>Paragraphs 6-11</u> During the process of developing the CNP,... if this kind of development goes ahead.</p> <p><u>Paragraph 13</u> The adopted District Council Core Strategy identified that CNDP should plan for 82 dwellings. In order to achieve this 11 sites were identified from the SHLA and subsequent enquiries to local landowners. Following a detailed site assessment, which included a Strategic Flood Risk Assessment (SFRA), the Land west of Marley Lane and the Land east of Chalgrove were identified as possible sites, with the land west of Marley Lane as the preferred option; this was supported by community consultation.</p> <p><u>Paragraph 15 (bullet points)</u></p>	<p><u>Paragraphs 6-11</u> These paragraphs regarding the Parish Council's objection to the strategic site at Chalgrove Airfield are negative in tone and do not add any value to the CNDP. It is likely that the Examiner will remove them.</p> <p><u>Paragraph 13</u> There is no mention of the steering group undertaking a 'call for sites' - that is asking landowners whether they would like their land considered for development as part of the neighbourhood plan-making process. Was a 'call for sites' undertaken? If so, please refer to it. This is standard practice for local plan-making.</p> <p><u>Paragraph 15 (bullet points)</u></p>	<p>strategic allocation.</p> <p><u>Paragraphs 6-11</u> Replace paragraphs 6-11 with: The emerging SODC Local Plan has identified Chalgrove Airfield, a site adjacent to the village, as a preferred strategic site of the District Council for the delivery of 3,000 new homes. The Parish Council and many residents object to this strategic allocation on sustainability and highway grounds.</p> <p><u>Paragraph 13</u> Refer to the 'call for sites' process if undertaken.</p>
--	---	---	---

<ul style="list-style-type: none"> • H1 option A (combine sites 1, 10 and 11) • H1 option B (site 7) <p>Paragraph 16 These sites performed most favourably in the site assessment, with H1 option A performing more favourably than H1 option B. Accordingly, H1 option A was selected as the site to be allocated for housing development in the CNDP.</p> <p>Paragraph 17 The comparative assessment identified that a combination of sites (1, 10 and 11) could be combined to create a potential development site capable of delivering the level of growth identified by the Strategic Housing Market Assessment (SHMA), the latest and up-to-date evidence of housing need. Other sites identified whilst being capable of development are not well related to the built-up area or to village amenities and would lead to the creation of separate enclaves within the village. The lack of school capacity and the resultant need for pupils to travel out of catchment give further weight to the</p>	<p>For reasons of clarity refer to these site options also by name.</p> <p>Paragraph 16 How did these sites perform in the Sustainability Appraisal? Refer to this.</p> <p>Paragraph 17 Reference to combining sites 1, 10 and 11 is repeated.</p> <p>The SHMA sets out several different growth scenarios. This evidence has been used to inform the emerging Local Plan. It is the emerging Local Plan that sets out the level of growth that the Council intend to deliver.</p>	<p>Paragraph 15 (bullet points)</p> <p>Amend text to read:</p> <ul style="list-style-type: none"> • H1 option A (combine sites 1, 10 and 11) – Land West of Marley Lane • H1 option B (site 7) – Lane east of Chalgrove <p>Paragraph 16 Add text regarding how the sites performed in the Sustainability Appraisal.</p> <p>Paragraph 17 Amend text to read: The comparative assessment identified that a combination of sites 1, 10 and 11 could create a potential development site capable of delivering the level of growth identified in SODC's emerging Local Plan, which is based on the Strategic Housing Market Assessment (SHMA), the latest and up-to-date evidence of the district's housing need.</p>
--	--	---

	<p>argument that to deliver more homes could lead to socially separate housing estates.</p> <p><u>Paragraphs 14 and 17</u> Two references to a 'comparative assessment'.</p>	<p><u>Paragraphs 14 and 17</u> Is the comparative assessment referred to the site assessment? This needs to be clarified.</p>	<p><u>Paragraphs 14 and 17</u> Clarify which assessment is being referred to.</p>
7	<p>Policy H1 – Housing Site Allocations</p> <p><u>Sentence 1</u> Land is allocated at Site H1 option A to the West of Marley Lane and as identified on the proposals Map 4 for 200 dwellings unless it can be demonstrated within a detailed masterplan that a higher or lower number is appropriate and provided the development meets other relevant policies of this Plan and the South Oxfordshire Core Strategy.</p> <p><u>Sentence 2</u> Should the planning application for Site H1 option B for up to 120 homes be granted approval prior to the NDP being made we</p>	<p>Policy H1 only makes one housing site allocation.</p> <p><u>Sentence 1</u> It is not clear when reading the policy where to locate Map 4.</p> <p>To ensure that the adoption of the emerging Local Plan doesn't make the policy out of date make reference to the Development Plan rather than the Core Strategy. The made CNDP will also form part of the development plan.</p> <p><u>Sentence 2</u> Government Guidance advises that a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient</p>	<p>Policy H1 – Housing Site Allocation</p> <p><u>Sentence 1</u> Relocate Map 4 so that it comes directly after the policy before the justification.</p> <p>Land is allocated at Site H1 option A to the West of Marley Lane and as identified on the proposals Map 4(below) for 200 dwellings unless it can be demonstrated within a detailed masterplan that a higher or lower number is appropriate and provided the development meets other relevant policies within the Development Plan.</p> <p><u>Sentence 2</u> Remove sentence from policy.</p>

<p>would support a development of 80-100 homes at site A to provide the total proposed level of acceptable growth of 200 homes.</p> <p><u>Justification (and Introduction – paragraph 18, bullets 1-3)</u></p> <p><u>Paragraph 8</u> To demonstrate how the site(s) will be developed in accordance with the NP policies on design, character, mix etc. applicants will be encouraged to engage with the Parish Council to agree a master plan or design code for the allocated site. This is consistent with the Core Strategy</p>	<p>clarity that a decision maker can apply it consistently and with confidence when determining planning applications. The policy as written is unclear and uncertain. There also does not appear to be a robust justification for limiting the number of homes built in the village to 200 (see comments below).</p> <p><u>Justification (and Introduction – paragraph 18, bullets 1-3)</u></p> <p>It is not clear why 200 homes represents a reasonable rate of growth. Issues regarding flooding, sewer capacity and school capacity are set out at paragraph 18 of the introduction but there is nothing to suggest that these issues cannot be addressed/mitigated. In fact the information provided regarding the sewer capacity suggests that upgrade works would need to take place once more than 140 dwellings are built. Therefore, in order to accommodate the 200 homes allocated in the plan Thames Water would need to undertake the upgrade works.</p> <p><u>Paragraph 8</u> This paragraph repeats text set out in paragraph 5.</p>	<p><u>Justification (and Introduction – paragraph 18, bullets 1-3)</u></p> <p>Strengthen your justification as to why 200 homes represents a reasonable rate of growth for Chalgrove. Make reference to any objective technical evidence that would support this and the findings of the Sustainability Appraisal.</p> <p><u>Paragraph 8</u> Delete.</p>
---	--	---

	<p>and emerging Local Plan for developments of this scale. This master plan should be subject to community consultation and be assessed for conformity with the Local Plan and Neighbourhood Plan policies and principles. Once permission has been granted the site(s) will be considered to be within the built-up area of the village.</p>		
8	<p>Site Specific Policies</p> <p><u>Bullet (i)</u> Site H1 A is allocated for 200 dwellings, subject to the following:</p> <ul style="list-style-type: none"> (i) The proposed development conforming to the policies contained in the Chalgrove Neighbourhood Plan and the South Oxfordshire Local Plan; and (ii) The follow site specific requirements <p><u>Bullets (a) and (g)</u> a) The site consists of 19.7 hectares, of which 8 hectares of developable land in flood zone 1 is proposed for 200 dwellings</p>	<p>For reasons of clarity this policy should have a policy number like the other policies.</p> <p><u>Bullet (i)</u> For reasons of clarity it would be easier to refer to the Development Plan, which includes both the Chalgrove Neighbourhood Plan and South Oxfordshire Local Plan (and extant Core Strategy while in place).</p> <p><u>Bullets (a) and (g)</u> For reasons of clarity it would be useful to illustrate these sites/areas on a map.</p>	<p>Add title to policy – Policy H1A – Land to the West of Marley Lane</p> <p><u>Bullet (i)</u> Site H1 A is allocated for 200 dwellings, subject to the following:</p> <ul style="list-style-type: none"> (i) The proposed development conforming to the policies contained in the Development Plan; and <p><u>Bullets (a) and (g)</u> Identify the developable land and land allocated for allotments on a site plan.</p>

	<p>g) No housing development to take place on the land allocated for allotments in the High Street adjacent to the Doctor's Surgery</p> <p><u>Bullet (iii)</u> Chalgrove Parish Council would welcome proposals that make provision for open market housing to be made available for sale to local residents for a period of three months prior to the release into the open market.</p>	<p><u>Bullet (iii)</u> As this bullet is not a requirement of the policy (and cannot be) it would be more appropriately placed within the supporting text or as a separate statement. Keeping this criterion within the policy is likely to raise unrealistic expectations within the community.</p>	<p><u>Bullet (iii)</u> Remove bullet from policy and place within supporting text or as a separate statement.</p>
9	Map 4	<p>Map 4 relates to Policy H1 and not the site specific policy. For reasons of clarity this needs to be relocated.</p> <p>How was this map produced? If you have taken it from the internet you will need copyright. The District Council can provide a map but not with an aerial base.</p>	<p>Relocate Map 4 so that it comes directly after the policy before the justification.</p> <p>Check and reference source of map or instruct SODC to prepare a new map on an OS base.</p>
10	<p>Policy H2 – Dwelling Mix</p> <p><u>Justification</u> <u>Paragraphs 1-3</u> The Local Plan policy of delivering affordable housing... Affordable housing identified in the Local Plan for South Oxfordshire will be delivered through the</p>	<p><u>Justification</u> <u>Paragraphs 1-3</u> These three paragraphs address affordable housing and do not provide a justification for Policy H2, which deals with Housing Mix.</p>	<p><u>Justification</u> <u>Paragraphs 1-3</u> Relocate text to a more relevant part of the plan or reformat page so that it is clear that this text deals with affordable housing.</p>

<p>Neighbourhood Plan.</p> <p><u>Paragraph 2</u></p> <p>Furthermore, to reduce the risk of out-commuting because people from outside Chalgrove are allocated properties, it is considered appropriate to prioritise the allocation of affordable housing to local people or those moving to the village for employment.</p> <p><u>Paragraph 3</u></p> <p>The Parish Council expects applications for planning permission for new housing to engage with it to demonstrate how the policy for Affordable Housing identified in the Local Plan for South Oxfordshire will be delivered through the Neighbourhood Plan.</p> <p><u>Paragraph 4</u></p> <p>The mix of dwellings should be proportionate to the range and mix of housing within the village and district, should not be dominated by one or two market types and reflect the housing</p>	<p><u>Paragraph 2</u></p> <p>This section of the justification suggests that people moving into Chalgrove from outside the village are more likely to work outside the village than people that already live within Chalgrove - Do you have evidence to support this assumption? Your justification for Policy H3 – Home Working explains that a higher percentage of Chalgrove residents travel 40km or more to work compared to both national and county figures. This undermines your justification to prioritise the allocation of affordable housing to local people.</p> <p><u>Paragraph 3</u></p> <p>This paragraph is unclear and confusing.</p> <p><u>Paragraph 4</u></p> <p>As correctly identified earlier in this paragraph the mix of dwellings should reflect the range and mix of housing within the village and district. Therefore, developers should take account of the housing</p>	<p><u>Paragraph 2</u></p> <p>Reconsider and rewrite the justification for prioritising the allocation of affordable housing to local people.</p> <p><u>Paragraph 3</u></p> <p>The Parish Council encourages applicants and developers to demonstrate clearly as part of planning application how they intend to deliver affordable housing that meets the policies of the development plan.</p> <p><u>Paragraph 4</u></p> <p>The mix of dwellings should be proportionate to the range and mix of housing within the village and district, should not be dominated by one or two</p>
--	--	--

<p>needs findings of the 2014 CNDP community questionnaire.</p> <p><u>Community endorsement</u></p> <p><u>Paragraph 5</u></p> <p>Given that over 80% (2014 Chalgrove Neighbourhood Plan Community Questionnaire) of the people who said they wanted a new home live in Chalgrove at the moment, Chalgrove Parish Council would welcome proposals for housing on the allocated sites that make provision for open market housing to be made available for sale to local residents for a period of three months prior to release onto the open market</p>	<p>needs findings of the 2014 CNDP community questionnaire and the Strategic Housing Market Assessment.</p> <p><u>Community endorsement</u></p> <p><u>Paragraph 5</u></p> <p>Who was the community questionnaire distributed to? If more than 80% of the questionnaires were distributed to people living in Chalgrove then you would expect more than 80% of the people responding to live in Chalgrove. It would probably be more useful to refer to the percentage of the population of Chalgrove looking for a new home in Chalgrove.</p>	<p>market types and reflect the housing needs findings of the 2014 CNDP community questionnaire and Strategic Housing Market Assessment.</p> <p><u>Community endorsement</u></p> <p><u>Paragraph 5</u></p> <p>Refer to the percentage of the population of Chalgrove looking for a new home in Chalgrove rather than the percentage that responded to the questionnaire.</p>
---	---	--

11	<p>Policy H4 – Residential Parking</p> <p>Proposals for new residential development, including extensions, should provide adequate parking provision in line with the parking standards set out in the Local Plan. In order to achieve this:</p> <ul style="list-style-type: none"> • Priority should be given to the provision of on-plot parking solutions that adequately meet current and likely future needs. Where on-plot parking solutions cannot be achieved or are inappropriate the reasoning for this should be set out in the supporting Design and Access Statement and an alternative should be formally designed into a proposed scheme and should discourage informal, anti-social parking from occurring. • On-street parking solutions for visitors should be formally designed into a proposed scheme and should discourage informal, anti-social parking from occurring. 	<p>The two requirements as set out in the policy are not easily applied to extensions as the current policy requires.</p>	<p>Proposals for new residential development should provide adequate parking provision in line with the parking standards set out in the Local Plan. In order to achieve this:</p> <ul style="list-style-type: none"> • Priority should be given to the provision of on-plot parking solutions that adequately meet current and likely future needs. Where on-plot parking solutions cannot be achieved or are inappropriate the reasoning for this should be set out in the supporting Design and Access Statement and an alternative should be formally designed into a proposed scheme and should discourage informal, anti-social parking from occurring. • On-street parking solutions for visitors should be formally designed into a proposed scheme and should discourage informal, anti-social parking from occurring. <p>Proposals for extensions will be supported where they maintain the amount of on-plot parking spaces and does not rely on on-street parking.</p>
----	---	---	---

<p><u>Justification</u></p> <p><u>Paragraph 1</u></p> <p>Ensuring that new development adequately caters for the needs of new residents is important. In particular, it is important to ensure that on street parking is minimised by making proper provision for cars within the development. The number of cars currently parked on street in Chalgrove causes problems across the village but in particular in areas of the High Street and in the Closes. This demonstrates the importance of new developments in these areas, or having an impact on these areas, making adequate provision for off street parking and not adding to the problem.</p> <p><u>Paragraph 2</u></p> <p>To satisfy Policy H4 the Parish Council would like to engage with developers on the delivery of off street car parking provision in problem areas of the village. The expectation is that car parking space provision should be linked to the number of bedrooms being provided. In Chalgrove, this is justified because of the high levels of car ownership (see Table 3 below) and</p>	<p><u>Justification</u></p> <p><u>Paragraph 1</u></p> <p>If designed properly, on street parking is an effective and efficient parking solution that adds vitality to the street-scene. In terms of visitors parking it is the most convenient and effective solution. Where on street parking is not designed properly into a housing scheme it can result in anti-social parking. Therefore, minimising on street parking is likely to lead to more problems than ensuring that it is properly designed.</p> <p><u>Paragraph 2</u></p> <p>The CNDP does not include a specific parking standard. Therefore new developments will have to conform to the District Council's parking standards. You should, therefore, consider whether this would be raising unrealistic expectations within the community.</p> <p>In terms of visitors parking, on-street parking provides the most convenient and effective solution.</p>	<p><u>Justification</u></p> <p><u>Paragraph 1</u></p> <p>Ensuring that new development adequately caters for the needs of new residents is important. In particular, it is important to ensure that proper parking provision is made for both residents and visitors within a development, including well designed on-street parking. The number of cars currently parked on street in Chalgrove causes problems across the village but in particular in areas of the High Street and in the Closes. This demonstrates the importance of new developments in these areas, or having an impact on these areas, making adequate provision for off-street parking and/or including well designed on-street parking.</p> <p><u>Paragraph 2</u></p> <p>To satisfy Policy H4 the Parish Council would like to engage with developers on the delivery of off street car parking provision in problem areas of the village. In Chalgrove, this is justified because of the high levels of car ownership (see Table 3 below) and the inadequate provision of public transport. This results in a need for a</p>
--	--	--

<p>the inadequate provision of public transport. This results in a need for a car for employment, leisure, social and domestic use. Visitor parking is also required to ensure that residential roads are kept free of parked vehicles.</p>	<p>Requiring developers to provide both residents and visitors parking on-plot is likely to significantly impact the viability of a residential scheme, as the density of the scheme is lowered and the land is used less efficiently. National policy does not allow plans to place policy burdens and/or obligations of such a scale that their ability to be developed viably is threatened.</p>	<p>car for employment, leisure, social and domestic use. An adequate amount of well-designed visitor parking is also required to discourage inappropriate parking.</p>
<p>Paragraph 3</p> <p>The Parish Council will work with the District and County Councils to produce a local parking standard for Chalgrove. This will address on and off site parking and the use of garages. Where garages are provided these should be large enough to accommodate a large family car. Whilst there is a shift from requiring maximum standards to minimum standards of provision in new schemes, the standards are not applied robustly or consistently. The policy is therefore, intended to make the standards for Chalgrove simple.</p>	<p>Paragraph 3</p> <p>The CNDP cannot place requirements on the District and County Councils. It is unlikely that the District Councils will prepare parking standards for a single village. This could be addressed by the neighbourhood plan provided there is evidence to support the required standards.</p>	<p>Paragraph 3</p> <p>Delete first and second sentences, to read:</p> <p>Where garages are provided these should be large enough to accommodate a large family car. Whilst there is a shift from requiring maximum standards to minimum standards of provision in new schemes, the standards are not applied robustly or consistently. The policy is therefore, intended to make the standards for Chalgrove simple.</p>
<p>Paragraph 4</p> <p>The need for appropriate off road parking provision is an important issue for residents. It helps to improve road safety as well as improve the appearance of the street scene. More successful</p>	<p>Paragraph 4</p> <p>Developers are not required to address existing problems. They are only required to mitigate any impacts of their development. You should, therefore, consider whether this would be raising unrealistic expectations within the community.</p>	<p>Paragraph 4</p> <p>The need for appropriate off road parking provision is an important issue for residents. It helps to improve road safety as well as improve the appearance of the street scene. More</p>

	<p>developments have at least two off road spaces plus a garage. New development also has the potential to alleviate existing parking problems by incorporating off road parking for adjacent properties.</p> <p>Existing developments in the village demonstrate the need for off street spaces. Ensuring that new development adequately caters for the needs of new residents is vital. In particular, it is important to ensure that on street parking is minimised by making proper provision for cars within a development.</p>	<p>See comments above.</p>	<p>successful developments have at least two off road spaces plus a garage. Existing developments in the village demonstrate the need for off street spaces. Ensuring that new development adequately caters for the needs of new residents is vital. In particular, it is important to ensure that adequate provision for off-street parking and/or well-designed on-street parking is provided in every development.</p>
12	<p>Flooding statement</p> <p>Proposals for new residential development will only be permitted where it can be demonstrated that the site is not subject to flooding or likely to add to flooding problems in the village.</p>	<p>This statement has been written as a requirement. You should consider whether this would be raising unrealistic expectations within the community.</p>	<p>Reword statement (below is an example for your consideration) -</p> <p>The Parish Council support new residential development where it can be demonstrated that the site is not subject to flooding or likely to add to flooding problems in the village.</p>

	<p><u>Supporting text</u></p> <p><u>Paragraph 5</u></p> <p>Because of the extensive areas of flood risk (see Map 5, below), and the potential impact of surface water run-off, the Neighbourhood Plan will require details of drainage and water retention to be submitted from the outset. Whilst not required it is considered that only a full application will be sufficient in sensitive areas.</p>	<p><u>Supporting text</u></p> <p><u>Paragraph 5</u></p> <p>National policy requires development to be directed away from areas at the highest risk of flooding. When determining planning applications local planning authorities have to ensure that flood risk is not increased elsewhere.</p> <p>Developers are already required to submit a foul drainage analysis as part of a full planning application and in an area liable to flood or sites with an area over 1 hectare a site specific flood risk assessment is required.</p> <p>It is not clear from this text who requires the details or who they should be submitted to.</p> <p>You should consider whether this would be raising unrealistic expectations within the community.</p>	<p><u>Supporting text</u></p> <p><u>Paragraph 5</u></p> <p>Because of the extensive areas of flood risk (see Map 5, below), and the potential impact of surface water run-off, the Parish Council encourages details of drainage and water retention to be submitted with all applications from the outset.</p>
13	<p>5.4 Community, Services and Facilities</p> <p><u>Introduction</u></p> <p><u>Paragraph 1</u></p> <p>Community infrastructure will be secured through Section 106 of the Planning Act or the Community Infrastructure Levy (when in place).</p>	<p><u>Introduction</u></p> <p><u>Paragraph 1</u></p> <p>The Community Infrastructure Levy was adopted by the Council in 2015 and came into force in April 2016.</p>	<p><u>Introduction</u></p> <p><u>Paragraph 1</u></p> <p>Community infrastructure will be secured through Section 106 of the Planning Act and/or the Community Infrastructure Levy.</p>

	<p><u>Paragraph 2</u></p> <p>Essential infrastructure required on a development site or immediately adjacent to it will be secured through S106 agreements. It is important for the environmental impact of new developments to consider the cumulative effect of the housing applications on overall capacity for all local services and infrastructure and ensure that sufficient water/sewerage/ transport/health facilities will be available in a timely manner.</p> <p><u>Paragraph 3</u></p> <p>On-site provision depends on scale but given the significant extent of the proposed allocation relative to the village this is likely to include community buildings, on-site maintenance of public open space, drainage, landscaping or other specialist provision. Infrastructure adjacent to the site is likely to include highway and traffic calming that is required to mitigate a development.</p>	<p><u>Paragraph 2</u></p> <p>This sentence is unclear and confusing.</p> <p><u>Paragraph 3</u></p> <p>Paragraph 122 of the CIL Regulations sets out the tests that a planning obligation has to meet in order to be delivered by a Section 106 agreement. Although the provisions made through a Section 106 agreement will relate to the scale of the development they are not dependent on it. All other provisions are included within the CIL charge.</p>	<p><u>Paragraph 2</u></p> <p>Essential infrastructure required on a development site or immediately adjacent to it will be secured through S106 agreements. It is important when planning new developments that the cumulative environmental impacts are considered, in particular their effect on the overall capacity of local services and infrastructure and to ensure that sufficient water/sewerage/ transport/health facilities will be available in a timely manner.</p> <p><u>Paragraph 3</u></p> <p>The exact site specific obligations provided by a development will likely reflect the scale of the development proposed and will be determined by the CIL regulation tests. The provisions sought could include community buildings, on-site maintenance of public open space, drainage, landscaping, highway improvements or other specialist provision.</p>
14	<u>Policy CF1 – Community Infrastructure</u>		

	<p><u>Levy</u></p> <p><u>Table 4</u></p> <p><u>Justification</u></p> <p><u>Paragraphs 2 & 3</u></p> <p>The full project list with indicative costing is in Table 4 - Project List for Developer Funding. The project proposals will be developed into specific projects that will be costed and phased and will be secured either through Community Infrastructure Levy (CIL) or S106, where this is directly related to a development proposal.</p> <p>Where possible projects may attract CIL or Section 106 funding, however, other sources of funding (grants and/or donations) will also be investigated.</p>	<p><u>Table 4</u></p> <p>For reasons of clarity this would be best located directly under Policy CF1 before the justification.</p> <p><u>Justification</u></p> <p><u>Paragraphs 2 & 3</u></p> <p>Whether a project receives Section 106 funding is dependent on it meeting the CIL regulation tests. The CIL spending strategy which is currently being prepared by the Council will set out how projects can obtain CIL funding. It may be worth noting that once the neighbourhood plan is made the Parish Council will receive 25% of the CIL payments made and could use this to fund some of the projects that are identified.</p>	<p><u>Table 4</u></p> <p>Relocate table directly under Policy CF1 before the justification.</p> <p><u>Justification</u></p> <p><u>Paragraphs 2 & 3</u></p> <p>Delete paragraph 3 and amend paragraph 2 to read:</p> <p>The full project list with indicative costing is in Table 4 - Project List for Developer Funding. The project proposals will be developed into specific projects that will be costed and phased and will be secured, where possible, either through Community Infrastructure Levy (CIL) or S106, where this is directly related to a development proposal. Other sources of funding (grants and/or donations) will also be investigated</p>
15	<p><u>Biodiversity – Supporting Statement</u></p> <p>The Parish Council supports the development management process that requires that applications for development must maintain and enhance the current biodiversity of Chalgrove.</p>	<p><u>Biodiversity – Supporting Statement</u></p> <p>It is not the development management process that requires applications to maintain and enhance biodiversity it is the policies within the Local Plan.</p>	<p><u>Biodiversity – Supporting Statement</u></p> <p>The Parish Council supports the District Council's Local Plan policies that required development to maintain or enhance biodiversity in the district.</p>
16	<u>Heritage Assets - Supporting Statement</u>	<u>Heritage Assets - Supporting Statement</u>	<u>Heritage Assets - Supporting Statement</u>

	<p>The Parish Council supports the development management process which requires development to conserve and enhance the heritage assets of the Parish and their setting, including maintaining settlement separation.</p> <p>In particular the Parish Council wishes to highlight the nationally Listed Buildings and sites of architectural significance, local distinctiveness & character and historic importance (see list in Appendix 2)</p> <p>The Parish Council is concerned that inappropriate extensions or revisions to Listed properties and other properties that, while not Listed, make a contribution to the character of the area and will not be supported.</p>	<p>It is not the development management process that requires applications to conserve and enhance the heritage assets it is the policies within the Local Plan.</p> <p>The final paragraph is unclear and confusing.</p>	<p>The Parish Council supports the District Council's Local Plan policies which require development to conserve and enhance the district's heritage assets and conservation areas for their historical significance and special character, including their settings and the separation of historic settlements.</p> <p>In particular the Parish Council wishes to highlight the nationally Listed Buildings and sites of architectural significance, local distinctiveness & character and historic importance (see list in Appendix 2)</p> <p>Remove third paragraph</p>
17	<p><u>Archaeological Sites - Supporting Statement</u></p> <p>The Parish Council supports the development management process that requires that any development on previously undeveloped land must allow for the investigation and the preservation of archaeological remains and protect recognised sites of archaeological importance.</p>	<p><u>Archaeological Sites - Supporting Statement</u></p> <p>It is not the development management process that requires applications to allow for the investigation and the preservation of archaeological remains and protect recognised sites of archaeological importance, it is the policies within the Local Plan.</p> <p>This requirement applies to land where sites or deposits of archaeological interest are known, orsuspected to exist and not to all previously</p>	<p><u>Archaeological Sites - Supporting Statement</u></p> <p>The Parish Council supports the District Council's Local Plan policies that require, where sites or deposits of archaeological interest are known, orsuspected to exist,for the investigation and the preservation of archaeological remains and protection of recognised sites of archaeological</p>

		undeveloped land.	importance.
18	<p><u>Implementation and Monitoring</u></p> <p><u>Five Year Review</u></p> <p>Chalgrove Neighbourhood Plan will be reviewed every five years. Review of policies will be led by Chalgrove Parish Council. The purpose of review will be primarily to assess the extent to which the objectives have been achieved in practice and the contribution of the policies and projects contained within it towards meeting those objectives; and secondly to rectify any errors and omissions. Where major amendments or additions are needed that cause significant public concern, a public consultation will be undertaken, to be sure that 50% or more of respondents to a consultation with residents accept the changes.</p>	<p><u>Implementation and Monitoring</u></p> <p><u>Five Year Review</u></p> <p>A review of the neighbourhood plan would likely have to go through the same processes and procedures as the original neighbourhood plan. This includes community engagement during the drafting of proposed changes to the plan all the way to a formal pre-submission consultation. Reviewing a neighbourhood plan may also include a new local referendum. To avoid undertaking additional consultation the support of the community could be sought as part of the normal process.</p>	<p><u>Implementation and Monitoring</u></p> <p><u>Five Year Review</u></p> <p>Chalgrove Neighbourhood Plan will be reviewed every five years. Review of policies will be led by Chalgrove Parish Council. The purpose of review will be primarily to assess the extent to which the objectives have been achieved in practice and the contribution of the policies and projects contained within it towards meeting those objectives; and secondly to rectify any errors and omissions.</p>
19	Appendix 1 – Important Green Spaces	For reasons of clarity it would be useful to relate these to the map in the Character Assessment	<p><u>Appendix 1 – Important Green Spaces</u></p> <p>Number green spaces in list and link to map in Character Assessment</p>
20	Site Assessment	This document is made up of the site questionnaires that were completed for each site and additional information regarding flooding. It also includes photos and site plans. The document illustrates that each site has been assessed consistently. There is no	Incorporate the sites assessment information into the Sustainability Appraisal report as an appendix.

		introduction or conclusion to the document so it feels more like an appendices than a stand-alone document.	
21	Character Assessment	There is a lot of very detailed information within this document. It is clear that a lot of time has been spent in gathering data and it is very pleasing and informative to read. The design section at the end of the document clearly sets out the features that contribute positively to the local character and identity of Chalgrove and what developers should do in order to reflect these positive features in the design of their developments and meet the community' expectations. The list of positive features and design criteria provide a strong link between this assessment and Policy C2 of the CNDP.	None.
22	Sustainability Appraisal Report (incorporating SEA Environmental Report)	<p>This is a well written and structured report.</p> <p>All aspects of the plan (objectives, housing numbers and policies) have been tested against the sustainability objectives with the exception of the vision.</p> <p>The assessment of housing numbers set out at Table 6.1 is supposed to be an objective assessment of solely the two growth options 1) 200 dwellings or 2) more than 200 dwellings. This should not relate or be influenced by specific site options.</p>	<p>Test the plan vision against the sustainability objectives.</p> <p>Reassess the two growth options set out in Table 6.1 so that the assessment is objective and not related to any specific site options.</p>

	<p>The mitigation of significant adverse effects has not been considered fully. Table 6.4 simple sets out which sites perform better against each sustainability objective and assumes mitigation to be met by choosing the sites that perform the best. The SEA regulations require the identification of measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. The assessment should, therefore, identify whether there is appropriate mitigation for each negative assessment result.</p> <p>No reasonable alternatives have been considered with regards to the plan policies.</p>	<p>Identify appropriate mitigation for each negative assessment result or explain why the negative impact cannot be mitigated. These mitigation measures could be recorded in the assessment tables.</p> <p>Identify reasonable alternatives for the plan policies and test them against the sustainability objectives or explain why there are no reasonable alternatives for consideration.</p>
--	--	---