

# Cholsey Parish Council



## Cholsey Neighbourhood Plan

# Feedback Report - SODC

## November 2017

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## Feedback Report

This document presents the feedback Cholsey Neighbourhood Plan (CNP) has received to its Pre-submission consultation with the statutory bodies, various landowners and the general community during its 7 week process.

The names of respondents are held as a separate list to protect individuals anonymity.

The second column records the comments received. The right-hand column records CNP's reply including references to the relevant Neighbourhood Plan policies which have been adjusted where the comment has highlighted an opportunity to improve the Plan.

CNP thanks all those who responded for their constructive and helpful comments which have allowed us to significantly improve the Cholsey Neighbourhood plan.

Page or para	SODC comments	Neighbourhood Plan Steering Group (NPSG) response
Page 9 Final para	<p>If the Examiner is satisfied that the plan is acceptable, then a referendum will be held at which all residents on the electoral roll in the parish can vote on whether the plan should be brought into force.</p> <p>The examiners recommendations are not legally binding. It is the role of the district council to consider the examiner's recommendations and determine if the plan should proceed to a local referendum.</p> <p>Please review this text to ensure it is factually accurate</p>	<p>Change to</p> <p>If the Examiner is satisfied that the plan is acceptable, then SODC, having considered the examiner's response, will decide whether the plan should proceed to a local referendum at which all residents on the electoral roll in the parish can vote on whether the plan should be brought into force.</p>
Page 11 Bullet 3	<p>Missing 'and' between Local Plan and the South Oxfordshire Core Strategy.</p>	<p>Agree change generally conform to the strategic policies of the adopted Local Plan and the South Oxfordshire Core Strategy</p>
Page 11	<p>SODC are in the process of making a new plan, the Local Plan 2033, which has reached the preferred options stage. In order to future proof our plan we are also trying to ensure it meets the requirements of the emerging SODC Local Plan 2033 as far as they are known, even though this is not a legal requirement.</p> <p>Paragraph 009 ref ID 41-009-20160211 of Planning Practice Guidance advises neighbourhood planning groups to take account of the reasoning and evidence informing the local plan process and encourages the preparation of complementary plans. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by an emerging Local Plan.</p>	<p>Agree change</p> <p>SODC are in the process of making a new plan, the Local Plan 2033, which has reached the preferred options stage. In order to future proof our plan we are also trying to ensure it meets the requirements of the emerging SODC Local Plan 2033 as far as they are known, this will enable the plan to conform with Planning Practice Guidance.</p>

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Page 11	<p>If passed at a local referendum, the neighbourhood plan will be adopted by SODC as the plan which must be used to determine planning applications in the Parish.</p> <p>The recently enacted Neighbourhood Planning Act makes neighbourhood plans part of the development plan once they have passed the referendum. The district council is still required to go through a process of confirming that the plan should remain in force or removing it from the development plan.</p> <p>Please review this section to reflect the latest changes brought by the Neighbourhood Planning Act.</p>	<p>Agree change If passed at a local referendum, the neighbourhood plan will be used immediately for determining planning applications in the Parish and will be formally adopted by SODC at the earliest opportunity.</p>
Page 21	<p><u>First bullet point</u></p> <ul style="list-style-type: none"> <li>support a locally appropriate level of housing growth in the village, to create a compact village form and to use land efficiently, whilst also restricting development in the open countryside beyond the village boundary shown on Map 4 and the Proposals Map</li> </ul> <p>You should only seek to restrict inappropriate development.</p>	<p>Agree change support a locally appropriate level of housing growth in the village, to create a compact village form and to use land efficiently, whilst also restricting inappropriate development in the open countryside beyond the village boundary shown on Map 4 and the Proposals Map</p>
Page 21	<p><u>Bullet point 6</u></p> <ul style="list-style-type: none"> <li>minimise the adverse effects of car travel, particularly congestion at peak times, discourage parking and speeding, which makes our roads less attractive for other users by: <ul style="list-style-type: none"> <li>making walking, cycling and public transport more attractive options for local journeys and ensuring new developments contribute to the network of routes available</li> </ul> </li> </ul> <p>New development will contribute towards mitigating their own impact. There is an opportunity to clarify what contribute to the network of routes available means. For example, does it mean adding, improving or both?</p>	<p>Agree change making walking, cycling and public transport more attractive options for local journeys and ensuring new developments mitigate their impact by contributing to the network of routes available both by adding new routes where practical and by making existing routes more attractive and practical to use, this may include road crossing facilities.</p>

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<p>Page 21</p>	<p><u>Bullet point 7</u></p> <ul style="list-style-type: none"> <li>Improve the level of facilities and services the community enjoy particularly: - to secure the expansion of the primary school as some children have had to attend</li> </ul> <p><u>Bullet point 7</u></p> <p>Paragraph: 045 Reference ID: 41-045-20140306 of Planning Practice Guidance encourages neighbourhood planning groups to consider what infrastructure is needed to support development and ensure that their neighbourhood can grow in a sustainable way.</p> <p>In doing so, consideration should be given to:</p> <ul style="list-style-type: none"> <li>how any additional infrastructure requirements might be delivered</li> <li>what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery</li> </ul> <p>The council is not convinced that the community aspirations set out in the neighbourhood plan, particularly securing of a local health facility and preschool and the expansion of the primary school, can be successfully funded/delivered by the level of growth promoted.</p> <p>With regards to the securing local health facilities and preschool, it would be helpful if the neighbourhood plan identified suitable sites, and if possible, sought to deliver it as part of a wider package alongside proposed residential development. This would involve clarifying how the proposed facilities would be funded.</p> <p>We encourage you to review this option with landowners/developers to avoid placing unrealistic pressures on the cost and deliverability of that development</p>	<p>Plans for the expansion of the primary school are already in place and money has been secured from other recent developments in the village as well as contributions expected from allocations in this plan.</p> <p>The health facility is only intended to be a small satellite facility from Wallingford Medical Practice and would not be a full surgery. This is not intended to be a free to use facility. More information is being sought from the CCG on the scale of any facility.</p> <p>All these facilities are intended to be on the allocated housing site as set out in Policy CNPH1. The plan allows flexibility for the developer to determine the precise location within the site.</p> <p>Extensive discussions have taken place and are continuing with the landowners/developers of the proposed housing site CHOL2 regarding these community aspirations; no indication has been given that the proposals are not viable.</p>

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Page 23	<p>The Local Plan attaches great weight to the protection and improvement of the urban and rural environment of South Oxfordshire, the quality of life which residents and visitors enjoy, their amenity and the conservation of its natural and created resources. This means precluding development which destroys, unacceptably damages or pollutes the environment. The Local Plan distinguishes clearly between the countryside and the built-up areas and aims to focus most development within the built up areas of the District. The plan aims to protect and strongly resist development within the countryside, particularly those areas of special qualities such as the best and most versatile agricultural land, Areas of Outstanding Natural Beauty, Strategic and Local Gaps. The loss of wildlife habitats and corridors is also resisted, together with harm to heritage assets and their setting. Enhancement of the countryside through good management is encouraged. The Local Plan aims to encourage high standards of design and sufficient infrastructure wherever new development is permitted.</p> <p>The Development Plan directs development to the most sustainable locations. The council's emerging Local Plan continues to focus new development in Science Vale for major development at Chalgrove and Berinsfield, and at market towns and larger villages commensurate with their size and capacity. Notably, Cholsey is one of the most sustainable villages in the district.</p> <p>National and local policies only seek to resist inappropriate development within open countryside. It is important to clarify this statement.</p>	<p>Propose change The Local Plan distinguishes clearly between the countryside and the built-up areas and aims to focus most development within the built up areas of the District. The plan aims to protect and strongly resist inappropriate development within the countryside,</p>
Page 24/25 Para 6	<p>The District Council has yet to finally determine in its emerging Local Plan, how it will meet its objectively assessed housing need over the plan period. The second Preferred Options consultation document 2017 indicates that it will maintain the spatial strategy of the Core Strategy in focusing housing and economic development on the main towns of the District, and then distribute growth across its rural areas in relation to the hierarchy status of its villages.</p>	<p>The neighbourhood plan sets out to achieve the level of growth that the latest iteration of the South Oxfordshire Local Plan 2033 suggests.</p>

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	<p>The second preferred options document suggests that the amount of housing in larger villages should grow by around 15%. Although not clearly specified it appears from the figures in the South Oxfordshire Housing Background Paper that the 15% figure is in addition to commitments from previous plans.</p> <p>To provide a more accurate picture of the strategic context, this section should refer to the proposed strategic allocations. References to the Science Vale would benefit from a little more detail.</p> <p><u>Paragraph 6</u></p> <p>The Development Plan directs development to the most sustainable locations. The council's emerging Local Plan continues to focus new development in Science Vale for major development at Chalgrove and Berinsfield, and at market towns and larger villages commensurate with their size and capacity.</p> <p>Cholsey is one of the most sustainable villages in the district. The evidence informing the Local Plan process indicates that Cholsey has capacity for approximately 649 dwellings, mainly down to one site (Land north of 12 Celsea Place) which has been identified to have capacity for 443 dwellings.</p> <p>The council is concerned that the capacity of Cholsey to grow in a sustainable manner has been partially overlooked and excessively constrained. This may as a result, impact on your ability to fulfil some of your neighbourhood plan's aspirations, particularly the delivery of identified priority infrastructure/facilities.</p> <p>We would like to offer the council's assistance in reviewing the level of growth proposed. We believe that as one of the most sustainable villages in the district, Cholsey can do more to help ensure that the neighbourhood plan's aspirations and needed facilities are delivered.</p>	<p>Within South Oxfordshire there is more capacity than the council proposes to use, merely because a theoretical capacity exists on a crude analysis does not mean it is appropriate to use every piece of land. To do so ignores cumulative impacts on communities and the capacity of infrastructure to support growth. Cholsey will grow by around 43% between 2011 and 2033 far beyond the 15% growth identified in the emerging local plan. This will impact on local services and structures supporting the village.</p> <p>OCC has advised that the capacity of the primary school, even with the proposed expansion, cannot support a significantly higher level of growth. Health services are also under severe strain with limited capacity for growth on the existing site. The CCG is extremely resistant to a separate or satellite surgery in Cholsey.</p> <p>Whilst there may appear to be further capacity in Cholsey it is not necessarily the most sustainable option to build further homes where infrastructure and</p>



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	<p>Please review the proposed level of growth and how the aspirations of the neighbourhood plan will be delivered, particularly the identified facilities needed to support the sustainable growth of Cholsey.</p>	<p>services cannot easily be provided locally.</p> <p>Cholsey is closely surrounded by two AONBs and has a sensitive landscape context. SODC HELAA and capacity assessments do not take account of this constraint. SODC's own landscape capacity assessment for CHOL2 does not support the housing figure suggested.</p> <p>The neighbourhood plan seeks to interpret the communities views and aspirations within the strategic planning context. The level of growth suggested by SODC is beyond that which the community has indicated they would support.</p>
	<p><u>Built Up Area Boundary</u> Cholsey is a single settlement with strong development pressures. There is a clear need for a distinction between the built up village area where certain forms of development are likely to be appropriate and the countryside, where protection and enhancement of the environment are most important. Defining the Built-up Area Boundary is a logical way of applying Government advice and strategic policy at the local level. The Built-up Area Boundary and related policies provide the basis for development management decisions to:</p>	<p>Advice noted – additional information has been added.</p>

Page or para	SODC comments	Neighbourhood Plan Steering Group (NPSG) response
	<ul style="list-style-type: none"> <li>• <u>define</u> those areas within which planning permission will normally be granted for new development, subject to other planning policies</li> <li>• <u>ensure</u> new development is sustainable</li> <li>• <u>enable</u> the best use to be made of existing and future services</li> <li>• <u>provide</u> a useful tool to protect against inappropriate development</li> <li>• <u>preserve</u> the setting of Cholsey by protecting the surrounding countryside from unnecessary development</li> </ul> <p>The boundary is important in setting a distinction between Cholsey's built form and the surrounding countryside. It is not simply a means of showing the limits of existing development, as some developed areas lie outside it and some undeveloped areas lie within it.</p> <p>The principles used in defining the Built Up Area Boundary are:</p> <ul style="list-style-type: none"> <li>• <u>the</u> <u>main</u> <u>existing</u> <u>residential</u> <u>and/or</u> <u>commercial</u> <u>areas</u></li> <li>• <u>on</u> <u>the</u> <u>edges</u> <u>of</u> <u>the</u> <u>village</u>, <u>where</u> <u>planning</u> <u>permission</u> <u>has</u> <u>already</u> <u>been</u> <u>granted</u> <u>for</u> <u>housing</u></li> <li>• <u>other</u> <u>land</u> <u>on</u> <u>which</u> <u>housing</u> <u>may</u> <u>be</u> <u>acceptable</u>.</li> </ul> <p>We have not included the following within the Built-Up Area Boundary:</p> <ul style="list-style-type: none"> <li>• <u>school</u> <u>playing</u> <u>fields</u>, <u>recreation</u> <u>grounds</u> <u>and</u> <u>allotments</u>, <u>where</u> <u>these</u> <u>adjoin</u> <u>the</u> <u>rural</u> <u>area</u></li> <li>• <u>groups</u> <u>of</u> <u>isolated</u> <u>houses</u> <u>or</u> <u>other</u> <u>buildings</u> <u>where</u> <u>infilling</u> <u>or</u> <u>intensification</u> <u>of</u> <u>development</u> <u>would</u> <u>not</u> <u>be</u> <u>acceptable</u></li> <li>• <u>land</u> <u>within</u> <u>the</u> <u>curtilage</u> <u>of</u> <u>dwelling</u> <u>houses</u> <u>which</u> <u>adjoin</u> <u>the</u> <u>rural</u> <u>area</u>, <u>where</u> <u>'back-land'</u> <u>development</u> <u>would</u> <u>not</u> <u>be</u> <u>acceptable</u>.</li> </ul>	

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	<p>Although, boundaries provide a useful guide for <u>decision making</u>, it is not intended that planning permission within the Built-Up Boundary will automatically be granted, as all proposals must have regard to all other planning policies.</p> <p>The <u>Brightwell-cum-Sotwell</u> Neighbourhood Development Plan (<u>BcSNDP</u>) has fairly recently passed examination. The <u>BcSNDP</u> proposed a Built-up Area Boundary similar to the one proposed in the Cholsey NDP.</p> <p>It is important to highlight that the examiner of the <u>BcSNDP</u> has made it very clear in his report that the proposed settlement boundary responded to a unique set of issues that exist within the particular context of <u>Brightwell-cum-Sotwell</u>.</p> <p>Should you wish to pursue this policy, it is important that you are able to demonstrate the following:</p> <ul style="list-style-type: none"> <li>• You have followed a robust process/methodology to draw the proposed boundary.</li> <li>• That the proposed boundary is drawn in a logical and consistent manner.</li> <li>• The boundary should only be used to restrict inappropriate development in the open countryside.</li> <li>• The plan is capable of delivering an appropriate level of development, commensurate with the capacity and sustainable nature of Cholsey.</li> </ul> <p>The boundary will not prevent small sites from coming forward - The CNP identifies that such sites will continue to come forward and make an important contribution.</p> <p>Please review this section and ensure that you have an appropriate evidence base and robust justification.</p>	

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<p>Paras, 1, 3, 4, 5</p>	<p><u>National and Local Strategic Policy</u></p> <p><u>Paragraph 1</u> National policy requires that enough housing is provided to meet the objectively assessed needs for the area<sup>4</sup>. Working together, all the councils in Oxfordshire have prepared an Oxfordshire Strategic Housing Market Assessment (SHMA)<sup>5</sup> that identifies the housing needs for the county and for each district.</p> <p><u>Paragraph 3</u> SODC will sub-divide the new SHMA housing figure into allocations for individual areas in the district in the South Oxfordshire Local Plan 2033. The Local Plan 2033 second Preferred Options stage of the plan indicates that larger villages should grow by around 15% over the plan period 2011 to 2033, and that development in larger villages should be proportional, appropriate and dependent on existing infrastructure.</p> <p><u>Paragraph 4</u> However, the emerging Local Plan 2033 policy H4 identifies that, 'A minimum of 1,122 homes will be collectively delivered through Neighbourhood Development Plans and Local Plan site allocations at the Larger Villages.' Three larger villages Berinsfield, Chalgrove and Wheatley, will have strategic housing allocations made through the Local Plan 2033. These three villages will not deliver an additional 15% growth above the strategic allocations. The emerging local plan also indicates that those villages with significant constraints such as the AONB or flood plains may not be able to deliver 15% growth. Finally it indicates that two villages, Chinnor and Benson, already have commitments which meet their 15% growth requirement.</p> <p><u>Paragraph 5</u> The emerging local plan proposes draft allocations at two larger villages not preparing neighbourhood plans. At Nettlebed the council proposes 39 new homes against a</p>	<p>This section has been updated</p>

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	<p>requirement for 60, and at Crowmarsh Gifford they propose allocations for 250 new homes against a requirement for 134. As the neighbourhood plan is moving forward faster than the Local Plan 2033, we are working closely with South Oxfordshire to ensure that the number of homes provided in Cholsey is sufficient to meet the requirements for our area.</p> <p><u>Paragraph 1</u></p> <p>National policy requires that enough housing is provided to meet the objectively assessed needs for the housing market area.</p> <p><u>Paragraph 3</u></p> <p>The first highlighted section is incorrect and should be omitted.</p> <p>The Local Plan 2033 second Preferred Options proposed that larger villages should grow by around 15% over the plan period 2011 to 2033.</p> <p><u>Paragraph 4</u></p> <p>The three larger villages (Berinsfield, Chalgrove and Wheatley) with strategic housing allocations made through the Local Plan 2033 are not expected to deliver an additional 15% growth.</p> <p><u>Paragraph 5</u></p> <p>Crowmarsh Gifford has recently been designated as a neighbourhood area and the local community is in the process of preparing a neighbourhood plan.</p> <p>For clarity, please replace the words 'the area' with 'the housing market area' in paragraph 1.</p>	

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	<p>Please omit the first sentence in paragraph 3 and replace the term 'indicates' with 'proposed'.</p> <p>In paragraph 4, please replace 'will not deliver' with 'are not expected to deliver'.</p> <p>Please update paragraph 5 to reflect Crowmarsh Gifford's neighbourhood area status.</p>	<p>This section has been updated and the commentary removed</p>
Pages 30 and 31	<p>Commentary on unsuitable sites is unnecessary and detracts from the plans' positive approach. You could improve this section by focusing on the site selection process and the suitability of your preferred option.</p> <p>The commentary on East End Farm site (CHOL1 for 68 homes) suggests that if permission is granted before the neighbourhood plan is finalised a reduced allocation on CHOL2 will be sought. The council is concerned a reduced allocation may detract further from Cholsey's capacity to grow sustainably and impact on the delivery of some of the neighbourhood plan's aspirations.</p> <p>Please review this section and omit commentary on unsuitable sites from the plan.</p> <p>Please see comment and recommendation Ref 5 and 7</p>	
Policy CNPH 1	<p>Cholsey is one of the most sustainable villages in the district. The evidence informing the Local Plan process indicates that Cholsey has capacity for approximately 649 dwellings, mainly down to this site (Land north of 12 Celsea Place) which has been identified to have capacity for 443 dwellings.</p> <p>The council is concerned that the capacity of Cholsey to grow in a sustainable manner has been partially overlooked and excessively constrained. This may as a result, impact on your ability to fulfil some of your neighbourhood plan's aspirations, particularly the delivery of identified priority infrastructure/facilities.</p>	<p>See comments on capacity above.</p> <p>A site map of allocated sites and a <del>masterplan</del> for the major sites will be added.</p> <p>We believe the council has miscalculated densities on the sites identified. In most areas of the village densities are significantly lower than the</p>

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	<p>We would like to offer the council's assistance in reviewing the level of growth proposed. We believe that as one of the most sustainable villages in the district, Cholsey can do more to help ensure that the neighbourhood plan's aspirations and needed facilities are delivered through this site allocation.</p> <p>It would be helpful if there <u>was</u> a map identifying the site allocation in the supporting text, in close proximity to the policy text.</p> <p>Policy CNP H1 sets out a <u>maximum density which matches the minimum 25 dwellings per hectare required by Policy CSH2 from the adopted Core Strategy.</u></p> <p>Policy CSH2 aims to promote sustainable development by promoting the efficient use of land and to meet needs for smaller and more affordable homes, particularly where there are good public transport links. The proposed density combined with the large landscaping buffer proposed may not achieve efficient use of land, potentially creating a basic conditions issue for the neighbourhood plan. It may also compromise the viability of the development.</p> <p>The council has noted that the proposed density is lower than the density observed in built up areas surrounding the site (please see appendix 2). This may not only fall short from achieving efficient use of land but it could also conflict with the existing character of the area.</p> <p>To comply with National Planning Practice Guidance (Paragraph: 048 Reference ID: 41-048-20140306) you should engage landowners and developers and ensure there is robust evidence demonstrating that the pressures on the cost and deliverability of the development, arising from the requirements of Policy CNP H1, are realistic and appropriate.</p>	<p>25homes/ha we are proposing, evidence is included in the revised plan. A density of 30 homes/ha may be appropriate in more urban settlements and urban extensions. Cholsey is a rural settlement in a sensitive landscape location. Landscape evidence has been commissioned and this recommends the buffer areas proposed to ensure new housing does not harm the setting of the AONBs and the wider landscape.</p> <p>The proposed policy DES8 in the emerging local plan is internally inconsistent in specifying a density of 30 homes/ha and that proposals should take account of local character. The proposed allocation and policy requirements <u>has</u> been discussed with the developers.</p>

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	Please review and amend the policy wording to address the concerns raised by the council.	
All policies	It would be helpful to the user if the policies were put in boxes. This would help to further distinguish policy text from supporting text.	Noted
Page 33	<p>This section explains that the neighbourhood plan has only looked to allocate sites of 10 homes or more. Whilst these allocations will meet the major requirement identified for the village there will continue to be small sites promoted for new housing.</p> <p>It then highlights that such small sites have been supported by the community and add to the variety and choice of homes available. However, the council is concerned that the tightly drawn proposed settlement boundary will not be able to accommodate the small sites which may come forward during the plan period, particularly when the requirements of Policies CNP H5 and CNP H6 are considered.</p> <p>To overcome this issue, it is important that your evidence base can demonstrate that your policies are not overly restrictive and unduly onerous.</p> <p>Please review the text, approach and evidence base to address the concerns raised by the council.</p>	<p>There are a number of small sites within the built up area boundary which could come forward and we are confident Cholsey will continue to contribute windfall development.</p> <p>Policy H5 has been clarified so that the requirements are appropriate to the site context and scale of development.</p>
Policy CNPH 2	<p>Outside the village boundary and the identified new housing sites any new development or change which does not meet these criteria will need to relate to special circumstances as identified in National Planning Policy</p> <p>Please see comment and recommendation Ref 8.</p> <p>The policy refers to important spaces and important views. These appeared to have been identified on a separate document. It would be helpful if the neighbourhood plan directed the reader to where the special spaces and views are identified.</p>	<p>Noted</p> <p>CNPH2 amended</p> <p>does not spoil an important open space of value to the community nor a space of environmental or ecological value, nor an important public view as set out in document - Cholsey Views Assessment</p>



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If you wish to raise any queries regarding this document or what it includes, please contact the Cholsey Neighbourhood Plan Team using the details below:

Email: [info@cholsey-plan.com](mailto:info@cholsey-plan.com)

Phone: 01491 652255 (Cholsey Parish Council)

If you would like to make a complaint please write to:

The Cholsey Neighbourhood Plan Team

Cholsey Parish Council, 31 Station Road, Cholsey, Wallingford OX10 9PT