

Cholsey Parish Council



Cholsey Neighbourhood Plan

2nd Reg14 Submission Feedback Report - Statutories

Spring 2018

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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 third 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 no.	April 2018 Comment or changed suggested	CNP steering group comments Text to change in CNP in red
13 – 29 46 - 49	<p>Historic England</p> <p>We welcome paragraphs 13 - 29 on the historical development of Cholsey. We also welcome the references to character and the history of Cholsey in the Vision, although we are disappointed not to see a specific reference to heritage assets and we would suggest “conserving” to “preserving” as recognising that some carefully managed change could be beneficial to the parish (as, indeed, implied by the last sentence of the first paragraph in section 3). We also welcome the second bullet point of paragraph 49 relating to heritage assets as part of the CNP strategy.</p>	<p>Change agreed</p> <p>The vision is by nature a short statement and it is difficult to encompass every aspect in detail. The strategy sets out more detail on the matters to be covered.</p> <p>Para 46</p> <p>Our vision is for Cholsey to continue to thrive, meeting the changing needs of the community whilst preserving conserving the distinctive character, landscape, and setting of the village that has evolved over eleven centuries of history.</p>
	<p>We note the references to character in the vision and in the first two paragraphs of section 3 and in the strategy, but is there any analysis or published description of that character? We note the Built Environment Assessment, which we welcome, but this is a gazetteer of designated heritage assets in the parish, not a character assessment.</p> <p>Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan as characterisation studies can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.</p> <p>The appendix to this letter contains links to further information on characterisation. We would be pleased to offer further information on this matter.</p>	<p>There is no published description of the whole village. The Historical Background section (paras 13 to 29) describes the development of the village to the present day and the Environment section (paras 183 to 194) describes the historic assets in more detail. This section does identify where improvement would be beneficial.</p>

Page 34 Policy CNP H1a	<p>We have assessed the proposed housing sites against our records of designated heritage assets. The western extremity of site CHOL1 & CHOL7 appears to be within the setting of the Grade II Duxford and The Willows and site CHOL10 is within the Grade II Registered Historic Park and Garden of Fairmile (either Maps 6 and 7 or their titles appear to be transposed).</p> <p>We therefore welcome the requirement for an appropriate setting for the listed buildings in the vicinity of site CHOL1 & CHOL7 in Policy H1a. Site CHOL10 is a redevelopment of existing buildings with the historic parkland, so hopefully the allocation of the site for housing will be an opportunity to enhance the parkland.</p>	<p>The masterplan for CHOL1 and 7 shows a considerable buffer area in front of the line of listed buildings, which fronted the old Wallingford Road in order to help conserve the context for the historic buildings.</p> <p>The site Fairmile Hospital has been intensively redeveloped in order to secure the funding to redevelop the listed buildings. CHOL10 is part of this redevelopment area. A comprehensive plan for the parkland areas has been implemented as part of the original redevelopment.</p> <p>Information from the HER is reproduced in paras 13 – 29.</p> <p>OCC (including the archaeological adviser) has commented on the draft plan</p> <p>This is included in Policy CNPE3</p>
Policy CNP H2 and CNP E3	<p>The Historic Environment Record and the South Oxfordshire District Council's Archaeological adviser should be consulted for any records of or potential for non-scheduled archaeological remains and the Oxfordshire Historic Landscape Character Assessment checked for any historic landscape features on site CHOL1 & CHOL7.</p> <p>We would welcome an additional criterion in Policy CNP H2 requiring development within the village boundary to conserve or enhance the significance of heritage assets (or not to harm the significance of heritage assets).</p>	
Policy CNP H5	<p>We welcome the sixth and thirteenth bullet points of Policy CNP H5. However, we are not convinced that the policy quite satisfies the requirement of paragraph 58 of the National Planning Policy Framework, which states “...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.” In addition, as queried above, is there that “understanding and evaluation” of Cholsey’s defining characteristics”?</p>	<p>We have provided an evaluation of the historic environment in the village at paras 185 to 194.</p> <p>Existing development in Cholsey is very varied and we did not see any great value in describing each small enclave in detail. As much as anything it is the rural context and extensive tree cover that give the village its special rural character. This is described in the environment section.</p>
Policy CNP H8 and CNP E3	<p>We would welcome an additional criterion in Policy CNP H8 requiring extensions to existing homes to maintain the significance and any historic or architectural features of historic houses (unless Policy CNP E3 is amended as we suggest).</p>	<p>This is included in Policy CNPE3. We cannot see where alterations to Policy CNP E3 are proposed.</p>

Policy CNP E3	<p>We welcome Policy CNP E1, Objective EO5 and paragraphs 184 to 194. As regards paragraph 184, the National Planning Policy Framework requires local planning authorities to set out in their local plans a positive strategy for the conservation and enjoyment of (and a clear strategy for enhancing) the historic environment rather than neighbourhood planning bodies in Neighbourhood Plans.</p> <p>However, we nevertheless welcome such consideration in Neighbourhood Plans, and we therefore welcome, in principle, Policy CNP E3 and its supporting text as being in accordance with the National Planning Practice Guidance advice to “<i>put broader strategic heritage policies from the local plan into action at a neighbourhood scale</i>”.</p> <p>We think it would be helpful to say a little more about the conservation area; e.g. when was it designated? Has the designation been reviewed? What is its special interest (the reason for designation)? Is there a character appraisal and/or a management plan for the conservation area? (This could identify the factors that detract from the special interest, character and appearance of the Conservation Area and a management plan could set out actions to address those factors).</p>	<p>Understood</p> <p>We believe that SODC will have such a strategy and that neighbourhood plan policies will operate alongside this.</p> <p>Unfortunately SODC have published very little information about the Cholsey Conservation Area and no Management Plan has been prepared. The information at para 189 is the best we have available.</p>
Paras 185 - 194	<p>We note the supporting evidence includes the “Built Environment Assessment”, which we welcome, although it is really a list of the designated heritage assets in the parish rather than an “assessment” as such. There could be an assessment of the spatial distribution of the listed buildings, or of their condition, or what they illustrate about the historical development of the parish. Other than the buildings being listed and therefore to be retained, are there any implications for the Neighbourhood Plan arising from their presence e.g. areas where new development would be inappropriate? The design, materials and form of new development?</p>	<p>Paras 185 – 194 provides an assessment of the spatial distribution of historic assets, the special importance of certain areas and the condition of buildings where relevant.</p>
Para 190	<p>Is the condition of heritage assets in the parish an issue? Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II buildings outside London. Has there been a survey of the condition of grade II buildings in the Plan area or has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive street-works etc? (We note the references to detractors from the character and enjoyment of the centre).</p>	<p>We have identified at para 190 some buildings where we believe the condition of the buildings is an issue. There has not been a comprehensive survey of local buildings so this view is just surmised from an external assessment.</p>
	<p>Is there a list of locally important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. Have the Oxfordshire Historic Environment Record and Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance?</p>	<p>There is no list of locally important buildings. OCC has been consulted on the draft plan.</p> <p>The plan includes information to guide decisions where this is relevant.</p>

	<p>The National Planning Practice Guidance states “... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions”. We consequently welcome paragraph 194 for its information about archaeology in the Plan area.</p>	Noted	
	<p>Finally, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base, perhaps by inputting to the preparation or review of a conservation area appraisal, the preparation of a comprehensive list of locally important buildings and features, and/or a survey of Grade II listed buildings to see if any are at risk of neglect, decay or other threats.</p>	<p>The steering group has sought volunteers from the community to help with the plan. At this stage close to submission it is unlikely that we will have the opportunity for a further study. It is nevertheless something that we can prepare on an ongoing basis to support the implementation of the plan.</p>	
	<p>Oxfordshire County Council</p> <p>The Publication South Oxfordshire Local Plan indicates that 175 further homes is the target for the NDP.</p> <p>The second draft neighbourhood plan no longer proposes an allocation of some 250 houses on the site known as CHOL2 as in the first draft, but instead proposes allocations for some 189 homes as follows (Policy CNP H1): • CHOL1 and part of CHOL7 combined – Wallingford Road – 165 homes • CHOL 10 Fairmile – 14 homes (ref P17/S3730/FUL) • CHOL 9 Boshers Yard A329 and Papist Way – 10 homes These numbers are additional to the 60 homes approved at Celsea Place on CHOL3 (P15/S0262/O and P17/S0875/RM) and other commitments.</p>		
	<p>Education - Given the constraints on local primary school capacity and shortage of early years provision noted in our previous August 2017 response, we appreciate the proposed reduction from 250 additional homes to 189.</p> <p>We have no further comments in addition to those made in our earlier response on the first draft in August 2017</p>	Noted	
	<p>Minerals - Sites CHOL1 and CHOL7 are within a Minerals Safeguarding Area and would sterilise deposits of sand and gravel. However, in view of the constraints on these sites and adjoining land imposed by existing housing and other sensitive built development, the development of these sites for housing would not significantly increase the sterilisation of mineral resources that are realistically available for potential working. Therefore, notwithstanding policy M8 of the adopted Minerals and Waste Local Plan: Part 1 – Core Strategy, no objection is made to proposed site allocation on the grounds of minerals safeguarding policy.</p>	Noted	

	<p>Public transport -</p> <p>As mentioned in our response last year, there are two trains per hour in both directions, from early to late most days, making Cholsey well connected to Reading, London, Didcot and Oxford. Encouraging good sustainable access to the train station is important to reduce the reliance on car journeys.</p> <p>A bus service currently exists linking Cholsey to Wallingford and Benson (#136). Contributions from some additional housing will assist in funding the bus service, but this does need to become commercially viable rather than depending on Section 106 receipts. The bus service currently operates during the day Monday-Saturday – a bus timetable is available at https://www.thames-travel.co.uk/routes/136</p> <p>There is also a limited bus service connection to Goring (#133) run by Going Forward buses - a bus timetable is available at http://www.goingforwardbuses.com/the-133/</p> <p>The County Council will seek that all sites contribute to the main bus service and that there be suitable bus stops within 400m of the site. Additional or improved bus stops may be required.</p>	Noted – see change below
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<p>Transport re Site Allocations -</p> <p>Our comments in respect of the application P17/S3730/FUL which relates to 14 additional homes and other uses on the Fairmile site (CHOL10) are available online and do not need to be repeated in this response. Our response dated 12 January 2018 confirms no objection subject to some matters of detail.</p> <p>We have no objection in principle to the allocation of CHOL9 for 10 homes. A key issue will be the suitability of the access and the width of the street carriageway. We expect that our transport response to any application on this site would also seek improvements to the bus stop, contributions to public transport, a travel plan and car and cycle parking.</p> <p>The proposed allocation for 165 homes at CHOL1 and CHOL7 will require more detailed consideration given the size of the development. We note that the Policy CNP H1a includes a number of transport requirements (copied below), but we have not considered those in detail. We would refer to our public comments in respect of P16/S3607/FUL, which was refused in May 2017, and the Inspector's decision dated 16 March 2018, which approved the application on appeal and includes a legal agreement. This allows for 68 homes on part of the site. It appears from the masterplan contained in the draft neighbourhood plan that the development would incorporate that approved in the appeal decision.</p> <p>Policy CNP H1a 86. Proposals on the adjoining sites CHOL1 and CHOL7 shall be in accordance with the Masterplan and shall provide or ensure that: - access via an improved junction at the East End Farm CHOL1 access to the Wallingford Road to include a ghost island and 15m separation between Goldfinch Lane and the improved East End Farm access - footpath and cycle links through the site linking Wallingford Road to Caps Lane and Ilges Lane - traffic calming on the Wallingford Road</p>	<p>We understand that there is no longer a requirement for a ghost island and this has been removed</p> <p>Change Para 86 CNP H1a</p> <p>Proposals on the adjoining sites CHOL1 and CHOL7 shall be in accordance with the Masterplan and shall provide or ensure that:</p> <ul style="list-style-type: none"> - access via an improved junction at the East End Farm CHOL1 access to the Wallingford Road to include a ghost island and 15m separation between Goldfinch Lane and the improved East End Farm access - footpath and cycle links through the site linking Wallingford Road to Caps Lane and Ilges Lane - traffic calming on the Wallingford Road - Appropriate contributions to public transport provision, for bus stop improvements - A travel plan and adequate car and cycle parking
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	<p>Transport Policies -</p> <p>We support the specific recognition of transport matters and objectives TO1, TO2, TO3, TO4 and TO5. We have not reviewed the specific areas of concern noted in paragraphs 259 and 260. We support Policy CNP T1 and Policy CNP T2 although would prefer T1 to refer to 400m rather than 500m as 400m is the County's standard:</p> <p>Policy CNP T1 270. New developments should connect to, and where possible, improve Cholsey's walking and cycling network. Where appropriate traffic calming, new junction arrangements and dedicated cycle and pedestrian paths should be provided. Proposals for over 10 homes should be within 500/ 400m of a bus or rail stop.</p> <p>Policy CNP T2 284. Proposals which improve public transport facilities, increase disabled provision and secure off-road car and cycle parking provision for rail users at Cholsey Station will be supported and encouraged. Proposals should be designed to minimise their impact on the AONB.</p> <p>Pledge T6 seeks the imposition of appropriate speed limits and traffic calming measures. Whether these will be possible will depend on funding for detailed investigation and delivery. The legal agreement for P16/S3607/FUL allows for some traffic calming in the form of speed cushions along Wallingford Road.</p>	<p>Whilst the NDP encourages the use of public transport, the 500m bus stop distance recognises the greater difficulty of providing close access in rural settlements where buses also have limited route options.</p>
	<p>Public Health - We fully support the inclusion of the statement "to improve the health and wellbeing of the community" within the overarching Neighbourhood Plan Strategy objectives.</p>	Noted
	<p>Archaeology - It appears that Policy CNP E3 provides adequate policy protection for archaeological heritage assets within the neighbourhood plan area.</p>	Noted
	<p>Natural Environment - We welcome the consideration of our comments last year and the strengthening of policy CNP E1 on biodiversity gain and development.</p>	Noted
	<p>Thames Water</p>	
	<p>General Comments - The 2nd Draft of the Neighbourhood Plan does not appear to have taken into account our comments made in August 2017. A copy of our previous response is attached for information and we would request that the corrections highlighted in our previous response are included in future versions of the Neighbourhood Plan.</p>	
<p>P23</p> <p>Para 49</p> <p>final</p> <p>bullet</p>	<p>Change requested by Thames Water</p>	<p>ensure that development does not worsen the extent and frequency of flooding events in the village by siting new development away from areas liable to flood, and to work with infrastructure providers to ensure essential facilities can be improved upgraded.</p>

Para 221	Change requested by Thames Water	<p>The older parts of Cholsey village have combined sewer pipes, this means both surface water and foul water are taken to the plant</p> <p>All systems in Cholsey including the older parts of the village are designed to take only foul water, not surface water. Thames will not support surface water connections which are proposed into the foul system.</p>
Para 223 bullet 2	<p>In the section which starts "SODC have prepared a Water Cycle Study. The second bullet points states: "11 wastewater treatment works, including Cholsey, will need improvements to prevent deterioration to receiving watercourses"</p> <p>This is incorrect the SODC Water Cycle Study states that there are 5 Sewage Treatment works that may need upgrades to accommodate the predicted growth. Therefore we would like to request this is amended to correctly reflect the detail contained in the WCS.</p>	<p>Page iv of the Water Cycle Study says</p> <p>The impact of the future Proposed Scenario was assessed at all 11 WwTWs.</p> <p>Improvements to wastewater treatment are likely to be required at all treatment works except Goring, in order to prevent deterioration to the quality of the receiving watercourse. We will change 11 to 10.</p> <p>Para 223 bullet 2 11 10 wastewater treatment works,....</p>
	We support Policy CNP13 and its requirement for All proposals except those for minor developments to include a water and wastewater impact assessment. We all support the requirement for all new development to be designed to Building Regulations water consumption standard for water scarce areas of 110 litres per person per day.	Noted
Para 223	<p>In relation to the text in Section 223, the SWOX area is one of 'serious water stress' it is considered that this wording should be used in place of 'a water scarce area'.</p> <p>With regard to the comment that 'none of the wastewater treatment receiving watercourses meet Good Ecological Status' it is understood that this is only in relation to phosphorous being present downstream from the works.</p>	<p>South Oxfordshire is in a serious water stress searree (SWOX), ...</p> <p>This information is taken from the SODC Water Cycle Study. This is changed to make it clearer.</p> <p>Para 223 bullet 3 none of the wastewater treatment receiving watercourses meets Good Ecological Status for Phosphorus, and several also fail for BOD.</p>

	With regard to the comment that 'increased effluent discharges do not pose a significant risk of increasing flooding', the impact of increased effluent flows and the increased risk of flooding will be assessed when and if the flow permit of a WwTW is increased or when a treatment capacity upgrade is planned.	As Cholsey WwTW is being upgraded now we assume that this assessment has been undertaken.
	With regard to comment that the 'sewerage system capacity in Cholsey is inadequate for the level of growth', further assessment will be required to determine the full impact once there is greater certainty on the location, scale and phasing of growth.	We believe this is a fair reflection of the situation and of the comments provided for the larger sites. This information is provided in the CNP, it is not clear why this assessment cannot be undertaken now.
	CHOL9 Boshers Yard corner of A329 and Papist Way On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. The comments are based on the assumption that foul flows will be connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the public sewer.	Noted
	CHOL 1 and & East End Farm together with Land West of Wallingford Road The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer is encouraged to liaise with Thames Water at an early stage to discuss the scale and phasing of development and the associated infrastructure requirements. Failure to do so could increase the risk of phasing conditions being sought on any approval to ensure that adequate capacity exists ahead of the occupation of development. The comments are based on the assumption that no surface water flows will be discharged to the public sewer	Noted
	CHOL 10 Fairmile On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. The comments are based on the assumption that foul flows will be connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the public sewer.	Noted

Para 166	In addition, since there are a number of protected species and areas of ancient woodland present within the boundaries of the Parish, it may be worthwhile to refer to advice pertaining to these designations whilst reviewing the Neighbourhood Plan. Please see the sections entitled 'Priority and protected species and habitat' and 'Ancient woodland and veteran trees' in Annex A for further information and advice.	<p>The proposals in the neighbourhood plan should not directly affect these areas, there are existing policies in the development plan which provide protection for protected species and ancient woodland. We see no need to repeat these in the neighbourhood plan.</p> <p>Add to para 166 There are a number of protected species and areas of ancient woodland within the Parish, policies in the South Oxfordshire Local Plan protect these and should be consulted.</p>
	Natural England	
Para 168	<p>In our review of the Cholsey Neighbourhood Plan – Draft – Reg. 14 pre-submission we have a few comments to make:</p> <p>Section 4.4; we recommend the inclusion of an additional policy which encourages the incorporation of high quality green infrastructure along cycle routes and foot paths, where possible. This would not only contribute to Objective TO1 of the Neighbourhood Plan which states that 'Cholsey's roads and paths should be attractive and encourage non-car travel', but would also help to improve habitat connectivity within the area.</p> <p>Policy CNP E1; we recommend an addition which ensures that new developments planned on land in current or recent agricultural use submit a soil survey as part of an application, and that this survey is taken into account so as to avoid loss of BMV (Best and Most Versatile; grades 13a) agricultural land in spatial planning. Loss of this resource must be avoided.</p>	<p>Changes to paras 168 and 169 proposed to make clearer the requirements for biodiversity and to enable agricultural land quality to be assessed.</p> <p>Policy CNP E1</p> <p>Delete from para 168 All proposals for development should demonstrate how they will ensure a net gain in biodiversity.</p> <p>Add - The loss of good agricultural land should be avoided, all proposals on current or recently used agricultural land should submit a soil survey</p> <p>Add para 169 All proposals for development should demonstrate how they will ensure a net gain in biodiversity. Important areas of green infrastructure should be protected and enhanced and where possible linked to other green infrastructure areas. New cycle and footpath routes should incorporate high quality green infrastructure.</p>

	<p>We would also like to draw your attention to the recently produced Neighbourhood Plan for Benson, in South Oxfordshire provides an excellent example. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording relating to the Environment, Green Space and Biodiversity is exemplary. We recommend that you consider this document, when reviewing yours.</p>	<p>We have looked at the Benson Neighbourhood Plan and have included elements of their policy relevant to our plan. The policies in any plan need to have a consistent approach and style we have therefore not used the Benson policy verbatim.</p>
	<p>Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final local plan include:</p> <p>Policies supporting the provision of connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change.</p> <p>Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure;</p> <p>Policies referring to Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;</p> <p>Strategic Environmental Assessment and Habitats Regulation Assessment Where Neighbourhood Plans could have significant environmental effects; they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance here.</p>	<p>A change to para 169 is proposed above to ensure Green Infrastructure is linked where practical. We believe that it is more appropriate that SODC specify the Biodiversity Measure for development proposals to ensure a consistent approach across the district.</p>
		<p>A Sustainability Appraisal has been prepared to accompany the CNP</p>

	<p>Best and most versatile agricultural land and soils Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in Natural England's Technical Information Note 049.</p> <p>Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.</p> <p>Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.</p>	<p>The Agricultural Land Classification was one of the constraints used in our site assessment.</p>
	<p>National Grid</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high voltage overhead powerlines and high-pressure gas pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • 4YG Route – 400kV from Moulsoford Down substation in South Oxfordshire to Didcot substation in Vale of White Horse • FM07 Charlgrove to Barton Stacey <p>From the consultation information provided, the above overheads powerline and underground pipeline does not interact with any of the proposed development sites.</p>	<p>Noted</p>

	Gas Distribution – Low/Medium Pressure Whilst there are no implications for National Grid Gas Distribution's Intermediate/High Pressure apparatus, there may however be Low Pressure (LP)/Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com	Noted
	Environment Agency We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1. On this basis we have no detailed comments to make in relation to the Plan at this stage. Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can complement other objectives such as enhancing green spaces.	Noted

South Oxfordshire District Council		CNP steering group comments Text to change in CNP or other document in red
Page or para no.	Comment or changed suggested	
Page 3 Foreward	Neighbourhood plans can identify and allocate sites for new development including housing, employment, business use, leisure and other forms of development. Allocating sites is one of the most powerful, but also most controversial	Noted

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	<p>aspects of neighbourhood planning. You should expect challenge and controversy but there are also many benefits, including bringing forward sustainable development to meet local needs and providing new infrastructure and services for the benefit of the community.</p> <p>The site assessment process is vital to evidence that the sites selected for allocation are the most appropriate – that they are in the most sustainable location, they are in conformity with the strategic policies of the Local Authority's Local Plan and that there is a good prospect that they will be developed.</p> <p>This process will also allow you to 'tell the story' of how the sites that are chosen for allocation were selected, and why others were not.</p>	
	<p>In our view, to robustly demonstrate to the community and to landowners and developers who may be promoting other sites that are not chosen to be allocated, the basis on which the decisions were reached, you should clarify the following points:</p> <ul style="list-style-type: none"> • The harm of developing CHOL2 as proposed by the developers. • How does the development of CHOL2 fail to establish the communities wishes and the evidence that supports this. • What is the evidence that the proposal at CHOL2 will put severe pressure on services, including the primary school and medical facilities, and that this pressure cannot be mitigated by the proposed development. • It would be helpful if you could clarify how the 650 new homes figure was arrived at. <p>The council's previous pre-submission consultation response highlighted that: <i>"The council is not convinced that the community aspirations set out in the neighbourhood plan, particularly securing of a local health facility</i></p>	<p>Following your previous advice we have removed the explanation for our site choices from the CNP. The site assessment document sets out the reasons for our site choices in more detail, the Chairman's Foreword was only intended to be a short summary to set the scene for this second consultation.</p> <p>We will ensure that these questions are addressed in the Site Assessment document.</p> <p>OCC has agreed that Cholsey Primary School and Cholsey Pre-school will be expanded on their current site and that expanded facilities will be available in 2019. Some funding for this has already been sought through developer contributions, future development will also be expected to provide funding.</p> <p>Cholsey pavilion is a good central location with car parking on site. Improving and consolidating community facilities on this</p>

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	<p><i>and preschool and the expansion of the primary school, can be successfully funded/delivered by the level of growth promoted.</i></p> <p><i>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”.</i></p> <p>It would be helpful if you could clarify how the current approach responds to these issues.</p>	<p>site would be an efficient way of meeting the village needs. The Happy Hub children centre currently operates from the changing facilities in the Pavilion. Our view is that CIL money could be used to make the premises fit for purpose for the Happy Hub and to provide changing facilities close to the playing pitches. We are only seeking to achieve a satellite surgery in Cholsey; as yet neither the CCG nor the medical practice has agreed that this can happen. Space for health facilities was included in the new Cholsey pavilion when it was built.</p>
	<p>Finally, 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>The council previously highlighted that: “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) the Cholsey neighbourhood plan 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 note that the numbers now proposed a less ambitious than those</p>	<p>We believe that the CNP approach follows the overall strategy in the existing development plan and that in the emerging local plan and that it is in general conformity with both plans. Both the development plan and the emerging local plan, which is at an advanced stage, propose a proportionate growth approach for the market towns and larger villages, with the emerging local plan advocating 15% growth. The CNP more than achieves this and in fact over the emerging local plan period 2011 to 2033 Cholsey will actually grow by around 45%. Wallingford will also grow by more than the 15% advocated.</p> <p>One of the reasons for setting out 15 year local plans is to enable infrastructure providers to plan their provision accordingly. We understand (and are already seeing) that the major funding for infrastructure will be directed to those areas where major growth is proposed i.e. Science Vale and the new or expanded settlements e.g. leisure provision funding from Wallingford is directed to Berinsfield. We would also expect that SODC in preparing the district’s overall strategy should be aware of infrastructure constraints and should be planning to</p>

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	<p>submitted in your first pre-submission version. In our view, this will severely impact on the longevity and effectiveness of your plan.</p> <p>You should consider how the prospect of having to carry out an early review of your neighbourhood plan, should it be rendered out of date by the emerging local plan, may affect and potentially disenfranchise the local community. In our view, every effort should be made to produce a long lasting plan.</p>	<p>help overcome these as most infrastructure providers plan at a more strategic level and are reluctant to work with NP groups. We and the local community have strong concerns about future education, health, water and waste water provision locally. OCC response to the CNP supports the proposals for around 200 new homes since that together with windfalls is all the expanded primary school can accommodate.</p> <p>There is strong concern about the capacity of Wallingford Secondary School, despite requests for information we have not been informed how secondary education will be expanded to cope. SODC are already receiving objections to new planning applications based on the limited capacity of the medical practice, despite significant pressure we have not been informed how medical services will be expanded. The limited water supply and needs for wastewater improvements should be well understood by the council through the Water Cycle Study work. Wallingford itself is one of the best preserved mediaeval towns in the country and has a very constrained historic centre, the council has not demonstrated how the town can cope with the pressures imposed by the scale of development currently anticipated within its catchment without detriment to the important historic fabric and to air quality.</p> <p>It appears that SODC are putting undue pressure on the parish council and steering group to allocate a particular site, this is not the district council's role and in our view would result in unsustainable development requiring residents to travel considerable distances to access services. The steering group has prepared a plan which will be effective in achieving our</p>

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Para 2	<p>Page 3- Chairman's Forward – A change of approach – Paragraph: We believe that by negotiation and using the two sites together we can achieved a much better scheme than that which is currently at appeal. Please replace "achieved" with "achieve"</p> <p>We would suggest that the paragraph is changed to: If the Examiner is satisfied that the plan is acceptable, 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 may vote on whether the plan should be brought into force. If more than 50% of those who vote say 'YES', then the plan will be used to help determine planning applications in the parish.</p>
Page 11 Figure 1	<p>Agreed July 2018- Inspector Examiner</p> <p>September 2018- The Council make the decision to progress to Referendum</p> <p>October 2018' October/December 2018- Adoption-If passed at the referendum the plan forms part of the Development Plan immediately, SODC then make the decision whether the plan remains part of the Development Plan.</p>

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Para 8	<p>If passed at a local referendum, the CNP will be used immediately for determining planning applications in the parish. SODC is required post the referendum to decide whether or not the plan should be made (Adopted).</p> <p>And also add: There are narrow circumstances where the local planning authority is not required to make the neighbourhood plan and this is when it is considered there would be a breach or otherwise would be incompatible with, any EU or human rights obligations.</p>	<p>Agreed</p> <p>If passed at a local referendum, the CNP will be used immediately for determining planning applications in the parish and will be formally adopted by SODC at the earliest opportunity. SODC is required post the referendum to decide whether or not the plan should be made (Adopted).</p> <p>add: There are narrow circumstances where the local planning authority is not required to make the neighbourhood plan and this is when it is considered there would be a breach or otherwise would be incompatible with, any EU or human rights obligations.</p>
Page 13	Please change to 'four sections' as there are only sections 1-4 listed below	Agreed This plan is divided into four five section
Map 3	This map is out of date.	Agreed – update map
Para 53	Change all 'Local Plan' in this paragraph to 'Development Plan'.	<p>...The neighbourhood plan must be in general conformity with the strategic policies of the current Development Local Plan.</p> <p>Our policies must reflect these policies and should plan positively to support them. The neighbourhood plan should not promote less development than is set out in the Development Local Plan, nor undermine its strategic policies.</p>
Para 54	Add 'open' countryside	<p>Not agreed</p> <p>We have used the wording in the NPPF para 55</p> <p>To use the word 'open' would introduce ambiguity about the nature of the countryside.</p>
Para 55	Change to: The development plan for South Oxfordshire District Council currently comprises:	<p>Not agreed</p> <p>This is clear that the development plan that applies to the parish and is therefore applicable to the CNP is as set out.</p>
Para 56	Change 'Local Plan' needs to be changed to 'Development Plan' as this will	<p>...The CNP will also replace some non-strategic Development</p>

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Para 59	be the case until policies are replaced by the emerging local plan. We would advise that this section is omitted. It is not clear what evidence justifies the assertion that the affordable housing policy won't change.	Local Plan policies as they relate specifically to this Parish. ... We have used the evidence in the publication version of the emerging Local Plan 2033. Change wording to: The affordable housing policy framework is well-established and is unchanged in the emerging Local Plan 2033 not likely to change in respect of the proportion of overall numbers required per scheme.
Para 64	Change 'Local Plan' to 'Development Plan' We suggest paragraph 64 is amended to include the following: 'There is no requirement to review or update a neighbourhood plan. However, policies in the neighbourhood plan may become out of date, for example if they conflict with policies in the Local Plan that are adopted after the making of the neighbourhood plan. In such cases the more recent plan policy takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust. To reduce the likelihood of the neighbourhood plan becoming out of date once a new Local Plan is adopted, communities preparing a plan should take account of the latest and up-to-date evidence of housing need.'	Not agreed We have tried hard to frame the CNP in simple ideas and language in order that the community will understand it and not be put off reading it. Whilst we agree that the suggested paragraph is technically correct we think that it is unduly long, alters the style of the document and introduces concepts such as precedence and material considerations that the community is not familiar with. We believe that we have taken account of the latest and up-to-date evidence of housing need and have explained this in the plan. We will in any event potentially need to review the status of the plan if the non-strategic policies proposed which are different to the emerging local plan's policies are successful through the examination and 'adoption' process. To set out all these nuances is likely to make the plan inaccessible to most of the community.
Para 70	We would suggest that this point is amended to: 'Development which consolidates the built form of the village and is in accordance with all the relevant Development Plan policies will be supported and encouraged, however proposals that are inappropriate	The point about 'open' countryside is covered on para 54 above. As with the comment on para 64 above we believe the suggested wording is trying to make the plan read like a Local Authority document, this is not required of neighbourhood

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	forms of development within an open countryside location and are not in line with the relevant Development Plan policies will not be supported.'	<p>plans which should be prepared by the community for the community. The wording should nevertheless be clear and unambiguous. We hope the compromise wording below achieves this.</p> <p>Development which consolidates the built form of the village is allowed and is in accordance with all the relevant policies will be supported and encouraged, but proposals for inappropriate development spreading over the countryside surrounding the village not in line with relevant policies will not be supported.</p>
Para 79	<p>Bullet 1 Add a capital to 'p' to SODC Local plan Bullet 2 Add a capital 'T' to 'there is a need'</p>	<p>Bullet 1 - SODC Local Plan Bullet 2- There is a need ...</p>
Para 83	<p>Please be aware that you should also note and consider the policy direction of the emerging Local Plan 2033 which identifies that a density of at least 30 dwellings per hectare is required not 25. Failure to address this conflict may result in the policy being modified or being rendered out of date by the emerging Local Plan, once it is adopted.</p> <p>If the policy is to remain in the plan, it would be worth identifying and providing robust evidence to why the density is needed to be lower than the Emerging Local Plan.</p>	<p>The policy direction of the emerging Local Plan is acknowledged in para 83 (we will make the source clear) and justification is then provided for our own approach. It is not clear what SODC are expecting here?</p> <p>We note from the emerging Local Plan understand that SODC in the emerging local plan at policy DES 8 are looking to achieve a higher minimum density of at least 30 dwellings per hectare.</p> <p>The density suggested in the emerging local plan is not justified by any evidence, whereas the CNP sets out comparative densities in Cholsey. Whilst Policy DES8 in the emerging local plan suggests all new development should meet this density, the lower case text in para 9.25 suggests this may only apply to strategic allocations and in the towns which we consider to be the right approach. Para 9.25 suggests that special consideration will be given in conservation areas and the</p>

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		AONBs, our view is that this statement should also apply to villages in rural areas. It is difficult to see how this density requirement is compatible with other policies in the plan requiring that proposals have regard to local character.	
Map 5	We would like to highlight that the master plan may wish to have regard to the site 'Land off Blackalls Drive' as it is currently being promoted for development and has a current outline planning application P18/S0139/O that is currently pending consideration. If planning permission is granted you may wish to demonstrate how it would be integrated to the master plan.	We think it would be confusing to include details of an undetermined application on the plan, particularly as the parish council is not supporting that proposal. If permission is granted we feel it would be better addressed by an amendment at the examination stage.	
Policy CNP H1	Remove the 'c' in front of 10.	The c is intended to denote circa or around, in view of the shape of this site it is difficult to be precise about the number of homes that can be accommodated. - Boshers Yard corner of A329 and Papist Way (CHOL9) around e around 10 homes	
Para 34 Policy CNP1a	This aspect of the policy could be perceived as being overly restrictive. Is there any justification for the requirement of the at least a 5m buffer? Neighbourhood planning examiners tend to delete arbitrary buffers that are not robustly justified. We would suggest the buffer requirement is either omitted or altered to be less restrictive. We would suggest the text is amended to: It is suggested there should be new fencing and at least a 5m of buffer planting between all homes in Rothwells Close and the new development in order to ensure (please add reasons).	This buffer area has been freely offered by the potential developers of the site. The buffer will improve the relationship between the existing homes in Rothwells Close and the new development and will provide green infrastructure connecting green spaces. Para 84 add Most of the homes in Rothwells Close are bungalows or chalet bungalows and most have extremely short rear gardens, there is a strong concern amongst residents that development on CHOL1 will be unduly close and overbearing, resulting in overlooking and loss of amenity. Whilst the proposed separation distances in Policy CNP H6 will assist in achieving a good relationship between the homes the developer has offered to provide the 5m buffer and this is a considerable	

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		comfort to residents in Rothwells Close. Additionally the buffer will provide an area of important green infrastructure which will connect green space areas to east and west.
Para 34 Policy CNP H1a	<p>This policy is considered overly restrictive and unduly onerous.</p> <p>It is noted that the separation distances specified later in the CNDP are not in accordance with the distances set out in the SODC Design Guide.</p> <p>Design policies in the adopted Development Plan and in our emerging Local Plan provide sufficient clarity and the necessary flexibility which enables the decision maker to apply the planning balance.</p>	<p>We do not believe this policy is unduly onerous. The separation distances in the South Oxfordshire Design Guide have not been justified by any evidence, whereas we have provided comparative distances for existing development in Cholsey. We believe the Guide's separation distances are more appropriate to urban areas and are not appropriate in a rural village context. It is difficult to see how a single approach can be applied universally across a district with both clearly urban and rural areas, we suggest a variable approach. We have seen evidence in recent planning applications of proposals being allowed using the design guide distances and do not believe this takes account of local character. The CNP has looked at the character of development around the village and identified comparative areas, with very few exceptions the character of Cholsey is more spacious with trees, landscaping and biodiversity to maintain a rural character and soften its impact on the wider landscape than the design guide proposals allow.</p> <p>The proposed policy provides a clear and unambiguous approach for Cholsey; it still enables decision makers to apply a 'planning balance'. Difficulty most frequently arises with proposals in existing gardens, the NPPF makes specific provision for policies to resist inappropriate development of garden land, and this CNP policy seeks to achieve that. 'Cramming' new development in small spaces is an area of strong concern to the community who feel it insidiously chips away at the village character and is also detrimental to health, well being and biodiversity.</p>

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Para 87 Policy CNP H1b	<p>Please be aware that you should also note and consider the policy direction of the emerging Local Plan 2033 which identifies that a density of at least 30 dwellings per hectare is required not 25. Failure to address this conflict may result in the policy being modified or being rendered out of date by the emerging Local Plan, once it is adopted.</p> <p>If the policy is to remain in the plan, it would be worth identifying and to provide robust evidence to why the density is needed to be lower than the Emerging Local Plan.</p>	This is covered in the comments on para 83
Para 89	The NPPF also seeks in paragraph 15 to ensure that housing is rural areas is sited where it will help maintain the vitality of the rural community.... Please change 'is' to 'in'	Agreed The NPPF also seeks in paragraph 15 to ensure that housing in is rural areas is sited
Para 98 Policy CNP H2	<p>We consider this policy to be overly restrictive and unduly onerous and does not have an acceptable threshold.</p> <p>The Adopted Local Plan 2011 identifies:</p> <p>Policy D4 All new dwellings should be designed and laid out so as to secure a reasonable degree of privacy for the occupiers. Development will not be permitted if it would unacceptably harm the amenities of neighbouring properties through loss of privacy, daylight or sunlight.</p> <p>Policy H16: Infill Development Proposals for housing on sites within the built-up areas of the towns and villages will be permitted provided that: i) an important open space of public, environmental or ecological value is not lost, nor an important public view harmed; ii) if the proposal constitutes backland development, it would not create problems of privacy and access and would not extend the built limits of the settlement; and iii) it does not conflict with other policies in the Development plan.</p>	<p>The scale of development proposed in the CNP is set out in Policy CNP 1 and does not need to be repeated here.</p> <p>The policies quoted from the saved Local Plan 2011 have a relatively short shelf life and the matters covered in saved policy H16 are not included in the emerging Local Plan, we are therefore finding it difficult to resolve this dilemma. The NPPF makes specific provision in para 53 for policies on inappropriate development of residential gardens, we do not see that reflected in the emerging local plan policy.</p> <p>We agree the policy wording taken together with the Built Up Area Boundary was ambiguous and hope that the amended wording resolves any difficulty.</p> <p>The policy wording has been amended to</p> <p>The village Built-up Area Boundary is defined on the Proposals Map. Permission will be granted for new homes on infill sites and other land which lies within the village Built-up Area</p>

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	<p>The Emerging Local Plan 2033 Policy identifies:</p> <p>Policy DES6: Residential amenity</p> <p>Development proposals should demonstrate that they will not result in significant adverse impacts on the amenity of neighbouring uses, when considering both individual and cumulative impacts, in relation to the following factors: i) loss of privacy, daylight or sunlight; ii) dominance or visual intrusion; iii) noise or vibration; iv) smell, dust, heat, odour, gases or other emissions; v) pollution, contamination or the use of / or storage of hazardous substances; and vi) external lighting.</p> <p>We would suggest that Policy CNP H2 is amended to conform with the Adopted and Emerging Local Plan.</p> <p>Please consider amending the policy wording to: New residential development in Cholsey will be focused in the (insert number) proposed housing allocations, which will deliver a minimum of (insert number) dwellings. In-fill development, which reflects the scale and character of the village, will be supported within the built-up area of Cholsey where it accords with the policies of this Plan and the Development Plan for the district.</p>	<p>Boundary 14 provided that any proposal accord with policies in the Development Plan and:</p> <ul style="list-style-type: none"> • an important open space of public, environmental or ecological value is not lost, nor an important public view as set out in document - Cholsey Views Assessment harmed • the proposal would not create problems of noise, privacy and access, for example by creating a narrow side access to the rear, and would not extend the built limits of the settlement; • does not create problems of privacy or nuisance to existing neighbouring properties for example by creating a narrow side access to land at the rear • maintains the general character and appearance of the area • does not extend the built limits of the settlement
Para 99	<p>We would advise that Point 99 is omitted completely and replaced with:</p> <p>Proposals for residential development outside of the built-up area of Cholsey will only be supported if they are necessary or suitable for a countryside location and consistent with local development plan policies.</p>	<p>Change para 99 to Outside the village Built-up Area Boundary proposals for new homes will only be supported where they satisfy the special circumstances identified in the National Planning Policy Framework* for sustainable development in rural areas. *NPPF para 55</p>
Para 122	<p>There is a small discrepancy in this section. It states that the plan agrees with the design guide objectives but then later the plan proposes different</p>	<p>We do not believe there is a discrepancy, we support the design guide objectives but we have a difference of opinion about how</p>

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	<p>housing spacing distances.</p> <p>We would also advise that you should avoid specifying that 'All development proposals should explain in the Planning Statement how they have met with all the objectives of the design guide, and where they have not, to provide reasons for an alternative approach.</p> <p>Your purpose would be better served by encouraging all development proposals to meet the objectives of the design guide rather than explain how they do it.</p>	<p>they are achieved in respect of housing separation distances.</p> <p>We want to encourage people to sue the design guide and believe it would be useful to understand how proposals meet the design guide objectives rather than have a bland statement that they do, in the same way that a neighbourhood plan must demonstrate how it meets the basic conditions. It may be that there are good reasons for a different approach and we are open to understanding that. We do not believe that this is an onerous requirement and can easily be encompassed in the Design and Access Statement.</p>
Para 129 and 131	<p>The separation distances for new homes that are specified and referred to within the NDP are more restrictive and onerous than those set out in the SODC Design Guide.</p> <p>Please be aware that you should also note and consider the policy direction of the Development Plan. Failure to address this conflict may result in the policy being modified or being rendered out of date by the emerging Local Plan, once it is adopted.</p>	<p>This matter has been covered in the response to para 34</p>
Para 137Policy CNP H5	<p>Bullet 8</p> <p>This part of the policy is contradicting your other policies through having different separation distances than the ones set in the South Oxfordshire Design Guide.</p>	<p>This matter has been covered in the response to para 122</p>
Para 138 CNP H6	<p>Paragraph 59 of the National Planning Policy Framework states that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. As worded, the policy is considered overly prescriptive and unduly onerous.</p>	<p>The policy relates to density, massing and layout of development and is a relevant matter for the CNP to consider. SODC includes separation distances in their design guide and the emerging plan refers to the use of this in the emerging local plan policies. It is perverse to suggest the policy in the CNP is overly prescriptive and onerous when SODC's own documents include requirements on exactly the same matter.</p>

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Para 168 CNP E1	<p>This policy should be omitted.</p> <p>Paragraph 115 of the NPPF identifies:</p> <p>Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.</p> <p>Paragraph 116 of the NPPF identifies:</p> <p>Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> ● the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; ● the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and ● any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. <p>The Emerging Local Plan also identifies through Policy ENV1: Landscape and Countryside of the:</p> <p>The district's landscape, countryside and rural areas will be protected against inappropriate development and where possible enhanced.</p> <p>i) Planning permission will only be granted for major development*</p>	<p>We understand the concern with the proposed policy and have used the policy in the emerging local plan as a base, in order to reflect local circumstances and information this is inevitably different to the emerging policy.</p> <p>Policy CNP E1 Para 167</p> <p>Cholsey's landscape, countryside and rural areas will be protected against inappropriate development and where possible enhanced, development will only be permitted:</p> <p>i) which supports small scale economic growth provided it conserves and enhances the landscape, countryside and rural areas</p> <p>j) where it protects or enhances:</p> <ol style="list-style-type: none"> a. key views of importance as set out in the document Cholsey Views Assessment b. the function and use of green spaces identified in document Cholsey Open Space & Recreation and new spaces created in new developments c. The landscape setting of the AONBs d. the attractive landscape setting of Cholsey taking account of the Cholsey Neighbourhood Plan, the Oxfordshire Historic Landscape characterisation Project and where appropriate, by landscape, visual impact assessment and AONB management plans; e. local landscape features such as trees (including individual trees, groups of trees and woodlands), hedgerows, watercourses and water bodies that contribute to locally distinctive landscapes, amenity and biodiversity or have important historical value;

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	<p>in the Chilterns and North Wessex Downs Areas of Outstanding Natural beauty (AONB) in exceptional circumstances and where it can be demonstrated to be in the public interest</p> <p>ii) Development which supports economic growth in rural areas will be supported provided it conserves and enhances the landscape, countryside and rural areas</p> <p>iii) Development will only be permitted where it protects or enhances:</p> <p>a. the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains;</p> <p>b. the attractive landscape setting of settlements or the special character and landscape setting of Oxford. Design must conform to the South Oxfordshire Design Guide, "made" Neighbourhood Development Plans, the Oxfordshire Historic Landscape Characterisation Project and where appropriate, by landscape, visual impact assessment and AONB management plans;</p> <p>c. local landscape features such as trees (including individual trees, groups of trees and woodlands), hedgerows, watercourses and water bodies that contribute to locally distinctive landscapes, amenity and biodiversity or have important historical value;</p> <p>d. the landscape setting and positive features of rivers and riverbanks. Outside settlements, proposals for mooring stages will not be permitted. Proposals for posts, earthworks or facing river banks with piles and planking will not be permitted. Where it is necessary to protect a riverbank from erosion, the protective measures must be designed to maintain and enhance the special character of the river and its environment.</p> <p>Policy CNP E1 is overly restrictive and conflicts with the NPPF in regards to development in the AONB. The policy as worded lacks the nuanced regard</p>	<p>f. the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains, the Ridgeway and Thames Paths. Outside settlements, proposals for mooring stages will not be permitted. Proposals for posts, earthworks or facing river banks with piles and planking will not be permitted. Where it is necessary to protect a riverbank from erosion, the protective measures must be designed to maintain and enhance the special character of the river and its environment</p> <p>Para 168</p> <p>All proposals for new development which affect features in bullets ii a to f 1-to-4 above must submit a Landscape Visual Impact Assessment (LVIA) following the Guidelines for Landscape and Visual Impact Assessment (3rd edition) with the application.</p> <p>All proposals for development should demonstrate how they will ensure a net gain in biodiversity.</p> <p>The loss of good agricultural land should be avoided, all proposals on current or recently used agricultural land should submit a soil survey</p> <p>Add para 169</p> <p>All proposals for development must achieve a net gain in biodiversity, preferably on the development site. Important areas of green infrastructure should be protected and enhanced and where possible linked to other green infrastructure areas.</p>

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	<p>for the economic and social well-being of the area and should be amended or omitted.</p> <p>The policy also seeks to impose a requirement as to what documents must be submitted with a planning application. According to the examiner of the Benson NDP (available here), this is not something that a neighbourhood plan policy can do. The documents which must accompany planning applications will be set out in the District Council's Local Validation Checklist.</p> <p>We would also highlight that it is not necessary for all proposals to demonstrate how they will ensure a net gain in biodiversity. The NPPF identifies in paragraph 109:</p> <p>The planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; 	<p>New cycle and footpath routes should incorporate high quality green infrastructure.</p> <p>We cannot find this reference.</p> <p>The government's recently issued 25 Year Environment Plan 'A Green Future' referenced in the CNP sets out in its first policy that it will 'embed 'an 'environmental net gain' principle for development, including housing and infrastructure.</p> <p>Our view is that our policy is therefore in line with current government policy</p>
Para 181	<p>This paragraph speculates about a potential proposed development which is not proposed by the neighbourhood plan. This paragraph should be omitted.</p>	<p>The paragraph will be amended to: We understand that a p Proposal s for a large scale development adjoining the River Thames that will marina (over 300 moorings) is being explored on land adjoining the bypass. We are concerned that a development of this scale will involve substantial disruption during construction and that in the longer term it will be harmful to the tranquil riverside environment, landscape setting of the AONB and local biodiversity and should</p>

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		be avoided. Proposals Also that it will result in conflicts with and hazards for other boat users locally particularly the large number of non-powered craft which use this section of the Thames should also be avoided. Rowing and kayaking are healthy forms of recreation and are an important recreation resource for the local community.	
Policy CNP E2	We are not clear if this is a policy. If so, it should be enclosed in a box like all the other policies.	Agreed Place policy box around CNP E2	
Para 195 Policy ENP E3	Please amend to : Proposals within the Cholsey Conservation Area or its setting and those affecting a listed building, registered historic park garden, archaeological remains or its/their setting must identify the special interest, character, appearance, importance and significance of the heritage asset and contribution to those of the setting for example by using Historic England advice 36.	Agreed Proposals within the Cholsey Conservation Area or its setting and those affecting a listed building, or registered historic park garden, or archaeological remains or its/their setting must identify the special interest, character, appearance, importance and significance of the heritage asset and contribution to those of the setting for example by using Historic England advice.	
CNP I3	The policy seeks to impose a requirement as to what documents must be submitted with a planning application. According to the examiner of the Benson NDP, this is not something that a neighbourhood plan policy can do. The documents which must accompany planning applications will be set out in the District Council's Local Validation Checklist. The highlighted section is overly restrictive and should be omitted. It is noted that the policy already requires "New developments to provide appropriate facilities for water supply and sewage disposal". Proposals for new development in Cholsey will not be supported until existing surface water flooding and sewage issues are resolved with infrastructure providers.	We have not found the reference in the Benson examination documents. Removal of highlighted para agreed. Proposals for new development in Cholsey will not be supported until existing surface water flooding and sewage issues are resolved with infrastructure providers.	
CNP I6	The policy currently is only applicable to the services/community facilities identified in graph 1. We would suggest that this is amended as follows:	Change policy to: Proposals that result in the loss of an essential community facility or service , including those in Graphic 1, through change	

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	<p>Proposals that result in the loss of an essential community facility or service, through change of use or redevelopment, will not be permitted unless:</p> <ul style="list-style-type: none"> i) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities; ii) it has been determined that the community facility is no longer needed; or iii) in the case of commercial services, it is not economically viable. <p>Appropriate, detailed and robust evidence will be required to satisfy the above criteria. The council will require the independent assessment of this evidence.</p>	<p>of use or redevelopment, will not be permitted unless:</p> <ul style="list-style-type: none"> i) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities; ii) it has been determined that the community facility is no longer needed; or iii) in the case of commercial services, it is not economically viable. <p>Appropriate, detailed and robust evidence showing where relevant that there has been a comprehensive and sustained marketing campaign for at least one year at a realistic price and in a manner to encourage a sale for the existing use will be required to satisfy the above criteria. Independent assessment of this evidence will be required.</p> <p>Add to para 228 Where the change of use of a public house is sought it is recommended that a public house use the CAMRA Public House Viability Test.</p>
CNP I9	<p>Neighbourhood planning policies should be locally specific and add detail/aid the interpretation of national and strategic local policies.</p> <p>This policy is less detailed than our existing and emerging policies. We have raised this issue before and consider this issue has not been satisfactorily addressed, therefore we recommend this policy is omitted.</p>	<p>Agreed Delete policy CNP I9</p>
CNP I11	<p>Paragraph 19 of the National Planning Policy Framework sets out the government's commitment to ensure that the planning system does everything it can to support sustainable economic growth. <i>Planning should</i></p>	<p>Paragraph 28 of the NPPF promotes sustainable new development in rural areas. It would in our view be inappropriate and unsustainable to encourage large-scale</p>

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	<p><i>operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</i></p> <p>Paragraph 28 states that Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. It encourages neighbourhood plans to support the sustainable growth and expansion of all types of business and enterprise.</p> <p>To conform with national policy, it is important that the neighbourhood plan does not take a more restrictive approach by only supporting small scale business uses.</p> <p>We recommend omitting 'small scale' from the policy wording.</p>	<p>economic growth in rural areas <u>which would require large amounts of in-commuting to attract a suitable workforce, difficulty in accessing suitable infrastructure or cause harm to the rural environment.</u> The neighbourhood plan is supportive of economic growth at a sustainable level; we believe the policy is clearly worded to achieve this.</p> <p>CNP I11Proposals for small scale business uses in or adjacent to the village will be supported where they meet other policies in thisthe Development Plan.</p>
CNP I13	<p>Please amend the policy to read:</p> <p>Small scale proposals for local tourism will be supported, provided they are also in accordance with the relevant policies in the Development Plan.</p> <p>The provision of appropriate signage and a permanent display to enhance The Dame Agatha Christie Trail and to direct visitors to village facilities is particularly encouraged.</p>	<p>Agreed</p> <p>Small scale proposals for local tourism will be supported, provided they meet other policies in this plan are also in accordance with the relevant policies in the Development Plan. The provision of in-particular appropriate signage and a permanent display to enhance The Dame Agatha Christie Trail and to direct visitors to village facilities is particularly encouraged.</p>
CNP ED1 and ED2	<p>Policies need to be enclosed into a policy box to be consistent with the rest of the plan.</p>	<p>Agreed</p> <p>Enclose CNP ED1 and 2 in policy boxes</p>

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

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