Dear Mrs Wilson,

SOUTH OXFORDSHIRE DISTRICT COUNCIL - CORE STRATEGY - IMPLICATIONS OF THE NPPF ON NEWNHAM MANOR, CROWMARSH GIFFORD - SHLAA SITES CR06 & CR07

Savills is instructed by Gladedale to submit the following representations in response to your e-mail dated 3 April 2012 and your subsequent letter of 23 April 2012. These requested our views on the implications of the National Planning Policy Framework (NPPF) on the emerging South Oxfordshire Core Strategy.

The comments set out in this letter refer specifically to development in and around Crowmarsh Gifford. We have not considered the implications of the NPPF on the Core Strategy as a whole.

Conserving & Enhancing Natural Environment

Section 11 of the NPPF refers to how the planning system can contribute to the natural and local environment. Paragraph 116 states major developments within Areas of Outstanding Natural Beauty should only be permitted in exceptional circumstances where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- The need for 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, development elsewhere outside the designated area, or meeting the need for it in some other way,
- Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Whilst it is recognised the AONB is an important factor in determining the location of housing developments the Core Strategy needs to recognise that not all parts of the AONB have equal importance or character value and those sites which demonstrate exceptional circumstances should be allowed. Notwithstanding this, it is accepted that developments which are sensitively designed together with appropriate landscaping are capable of blending into the wider landscape with relatively little harm; in some cases development can help improve featureless/ characterless areas.

This approach therefore needs to be incorporated within the Core Strategy to make it consistent.
Presumption in Favour of Sustainable Development

We do not consider that the current version of the Core Strategy adequately reflects the presumption in favour of sustainable development set out in the NPPF.

It is recognised that the Core Strategy is based on the principles of sustainability. However the NPPF sets out an amended definition for sustainable development, based on a three stranded approach including environmental, economic and social criteria. Each one being mutually dependant on each other. This revised approach needs to be incorporated within the Core Strategy to make it consistent.

Given the above, we consider that it would be appropriate for the model policy as set out on the Planning Portal and reproduced in your letter of 23 April 2012 to be included within the Core Strategy.

The model policy replicates the criteria set out at Paragraph 14 of the NPPF and is therefore entirely consistent with the underlying aims and objectives of the NPPF.

Yours sincerely

Arron Twamley
Associate