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Mr A Ashcroft
c/o Planning Policy
South Oxfordshire District Council
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By email only: planning.policy@southoxon.gov.uk

20th April 2018

Dear Mr Ashcroft

RESPONSE TO WARBOROUGH & SHILLINGFORD NEIGHBOURHOOD PLAN EXAMINER HEARING NOTE. STATEMENT SUBMITTED ON BEHALF OF WELBECK LAND.

- 1.1 The following statement is submitted on behalf of Welbeck Strategic Land II LLP (Welbeck Land), in response to Warborough & Shillingford Neighbourhood Plan Hearing Note (29th March 2018) – revised on 6th April 2018.
- 1.2 Welbeck Land controls land on the edge of Warborough and Shillingford, as shown on the plan contained at **Appendix 1** (referred to in the emerging Neighbourhood Plan as 'Plough Field').
- 1.3 An outline planning application (reference P17/S4437/O) for up to 110 new homes and associated infrastructure was submitted to South Oxfordshire District Council on 18th December 2017 and is currently pending determination.

Will the development of the site contribute towards the achievement of sustainable development in the neighbourhood area?

- 1.4 It should be recognised that the village is a sustainable location for development and benefits particularly from the close proximity to major settlements including Abingdon-on-Thames, Didcot, Oxford and Reading and the many services and facilities.
- 1.5 We note that there is currently planning consent for 29 dwellings on land at Six Acres and, notwithstanding the emerging Local Plan objectives for Warborough and Shillingford to expect delivery of 5%/10% growth (22 - 44 additional dwellings) over the plan period to 2033. The current consent would amount to approximately 6% growth. We believe that in view of the period to 2033 (15 years), there should be provision for additional development during this period.
- 1.6 There is also considerable concern that the plan has not positively engaged with the opportunities to plan for the sustainable growth of Warborough and Shillingford. The level of services available in Warborough and Shillingford is recognised in the plan including:

- The primary school.
- Village Post Office and shop.
- A pub.
- The Church.
- The Green and Hammer Lane play areas.
- The village hall.

- 1.7 Not planning appropriately for Warborough and Shillingford, risks not only the continued vitality and vibrancy of the community and its facilities (which is identified as a concern within the draft Neighbourhood Plan), but also increases the risk of unplanned growth in less sustainable locations, or in places not yet allocated in the Warborough and Shillingford plan if the district council cannot maintain the relevant land supply for houses. There is an even greater risk of this where proposed site allocations within the Local Plan context cannot be delivered.
- 1.8 There has been limited growth in the village over the last 20 years, which according to the Sustainability Appraisal amounts to only 6 dwellings (1.5%). Given the very real need for new affordable homes, and to help support existing services and facilities in the Parish, there needs to be a step change in the delivery of new homes, which can be achieved by allocating more sites in the Neighbourhood Plan.

Has the site selection process been robust and evidence-based?

- 1.9 Notwithstanding the context set out above, the Neighbourhood Plan assessment of sites is not robust and does not evaluate the site options in an objective and consistent manner. The submitted Neighbourhood Plan therefore fails to meet the first basic condition as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.
- 1.10 The Neighbourhood Plan does not meet the first basic condition as it fails to follow the advice contained within the Planning Practice Guidance: Paragraph: 040 Reference ID: 41-040-20160211 which necessitates that (excerpt):
- “Proportionate, robust evidence should support the choices made and the approach taken.”*
- 1.11 Policy H2 of the Submission Neighbourhood Plan allocates the Six Acres site for housing development. The rationale underpinning the allocation of the Six Acres site is set out in the Neighbourhood Plan Sustainability Appraisal Report.
- 1.12 Six Acres is the only site that has been assessed in the Sustainability Appraisal (SA). The SA states that “the Six Acres site performed better than all others, comparatively, in sustainability testing.”
- 1.13 The site assessment for Six Acres concludes that it is suitable for development. However, it is unclear why the site scored significantly better than other comparable sites, such as Plough Field. In our view, a *proportionate and robust* approach to the sites assessment has not been applied and the omission of the Plough Field lacks robust justification, as demonstrated at **Appendix 2**.

Concluding Comments

- 1.14 For the reasons given above, the Neighbourhood Plan and its evidence fails to meet the first basic condition.
- 1.15 It is considered that the process in identifying suitable sites for housing within the Neighbourhood Plan has not been undertaken robustly. This is shown by the Neighbourhood Plan allocating the Six Acres site for development on the basis that the site has the least constraints and would have a limited impact. This statement demonstrates that this is not the case and therefore, a more detailed consideration of the other options within the Village should be explored, particularly Plough Field, which is entirely suitable as a sustainable residential extension to the village.

- 1.16 Whilst we consider that Plough Field is a more suitable site, given the overall level of housing need, smaller sustainable settlements such as Warborough and Shillingford can and should accommodate further housing development to help sustain local services and facilities and to improve issues of affordability, matters recognised in the Neighbourhood Plan that require addressing.
- 1.17 In order to comply with the basic conditions the Neighbourhood Plan would be required to revisit its assessment of sites. The assessment of sites must be *proportionate* and *robust*, and the conclusion should be to allocate Plough Field for development.

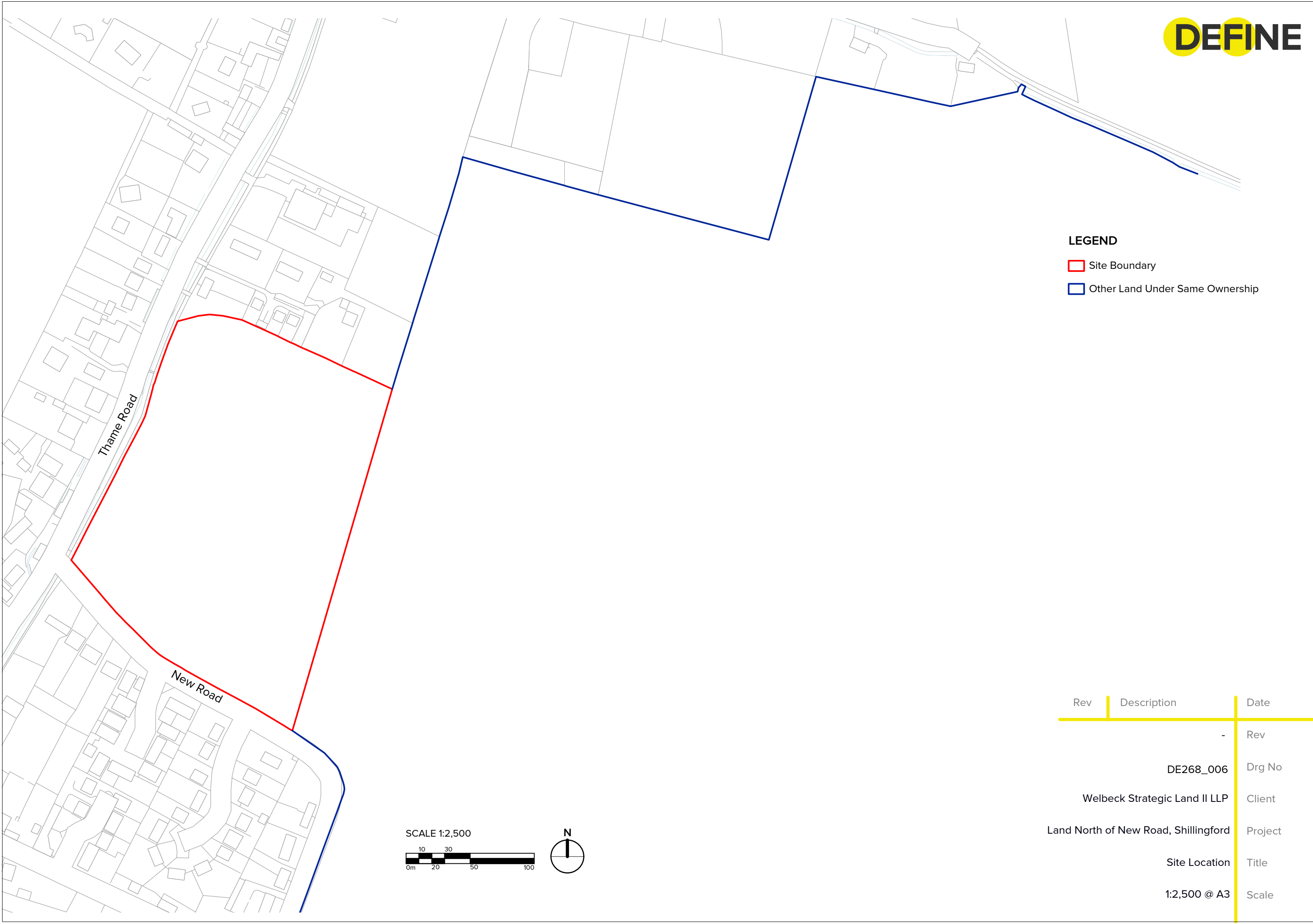
Yours sincerely,



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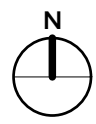
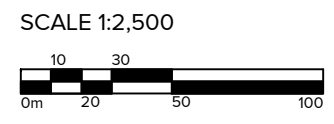
Appendix 1 – Site Plan



LEGEND

- Site Boundary
- Other Land Under Same Ownership

Rev	Description	Date
-		Rev
	DE268_006	Drg No
	Welbeck Strategic Land II LLP	Client
	Land North of New Road, Shillingford	Project
	Site Location	Title
	1:2,500 @ A3	Scale



**Appendix 2 – Comments on
Technical Site Assessment
Report**

Appendix 2: Shillingford Site Assessment Comparison

		Six Acres Site		Plough Field Site		Carter Jonas Comments on behalf of Welbeck Land
Heritage & Culture	Is the site in the greenbelt?	No		No		No comments.
	Does the site include any designated heritage assets – listed buildings, archaeological features?	A field evaluation was undertaken in summer 2017 (30 trenches, 20m long; report provided to SODC Planning) and confirmed the site has no archaeological significance.		Many fields locally have had significant archaeological finds discovered when gravel extraction was threatened and documented in local surveys reviewed as part of the SASR; in this field, especially: expect significant archaeological value. Archaeological digs appear to have taken place in 2017, but no results have been shared with the NP.		<p>A Heritage Assessment was submitted to accompany the planning application (December 2017) for Plough Field. The County Archaeologist has since confirmed that he has no objection, subject to conditions. Both the submitted Heritage Assessment and the County's consultation response are publicly available via the Council's online planning application portal.</p> <p>The archaeological evaluation for Six Acres recorded a small number of archaeological features. These features will require further investigation and recording ahead of any development and a condition for a programme of archaeological mitigation will need to be attached to any planning permission. It is therefore inaccurate to say that the site has no archaeological significance.</p>
	Are there any other features of local historic interest?	None identified		Part of historic 'Plough field' which previously held a world ploughing championship, which is commemorated with a statue on the site.		The proposed development will not result in the physical loss or loss of appreciation of the monument as its 60m to the south-east of the site. Although the proposed development will result in the loss of agricultural land associated with this local pastime, it will not prevent future events in the surrounding agricultural landscape.
	Is it immediately adjacent to any designated	Archaeological Assessment by Thames Valley Archaeological Services' report recognises the sensitivity of the Conservation area and quote: "several listed buildings		Not adjacent to any listed buildings or Conservation Area, but a valued main road entrance to the nearby Warborough Conservation area		How can it be that Six Acres and Plough field both score the same for this? Where is the evidence demonstrating that development on the Plough Field would have an equal impact on the Conservation Area and listed buildings? As per the

	<p>heritage assets or areas (e.g. Conservation area)?</p>	<p>and a Conservation Area lie close by. The development proposal will need to be sympathetic to the character of the area or enhance the settings of these listed buildings.” Detailed mitigation has been proposed to reduce potential harm to heritage assets. This has been carefully considered as part of the NP process. To provide additional rigour, the NP process has drawn on specific observations from the planning application (see Appendix 6.5.4 Heritage Impact Assessment, Bidwell’s Heritage Impact Statement Appendix 6.5.3 and Historic England response 6.5.2) and concludes that, if the site is suitable in principle, any scheme should:</p> <ul style="list-style-type: none">• further mitigate visual and landscape impact on adjacent Conservation areas and listed buildings by providing buffer zones (north eastern and western boundaries) with additional landscaping, and a design appropriate for adjacent listed cottage-type buildings.• use materials, designs and layout to reflect the best of the rural village character across the site with particular reference to the Character Assessment and design policies. See below for impact on views, ecology and arboriculture, landscape		<p>tracked change comments in the Sustainability Assessment Report Appendix 2 – Technical Site Assessment Report, we are concerned that the assessment of the proposed allocation is somewhat “light” compared to the assessment of other sites, such as Plough Field.</p> <p>In the conservation officer’s comments on the planning application for Plough Field, she does not believe that any listed buildings would be detrimentally harmed by development on the site. She also considers that there would be minor and limited harm to the conservation area as a result of development that erodes some of the open approach to the rural settlement. This would be no more than less-than-substantial harm, as per the tests of paragraph 134 of the NPPF and would be very much at the lower end of the spectrum of harm given the separation and lack of direct impact to designated assets,</p>
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Carter Jonas

		and rural character concerns.			
	Does it have any significant cultural associations e.g. with significant local events or people?	No		Part of historic 'Plough field' which previously held a world ploughing championship, which is commemorated with a statue on the site.	Where is the evidence to demonstrate that the site has a significant cultural association with significant local events and people? The event was one off and took place over 30 years ago. The statue would remain in place. The development will give community access through the village green, allotments and new public footpath walk. The area would thus become an area for residents to take ownership of.
Landsc ape/Rur al Charact er & Quality (Close View)	Are there attractive natural features (e.g. trees, hedgerows, water), landform, buildings or structures on site that contribute to local landscape/rural character?	Mature trees and an overgrown hedge offer screening of the view perpendicular to the A329/Warborough ditch and path with a gap at the site entrance. The Eastern side has a thick tree/ shrub boundary to gardens and fields, screening inward and onward views to the Chilterns (carefully considered in Community Views in the Character Assessment). Flanking gardens and school have views into the site. There are glimpses to the site between listed buildings from The Green South, and the site is important to the setting of adjacent listed buildings. This flat plot is unmaintained and has ragwort present. Throughout the NP consultation and historic village consultations, the site has been identified locally as having potential but has concerned some adjacent residents. The site's location at the centre of the village could present opportunities to meet village and plan objectives but needs to be handled sensitively given its proximity to the		Large prominent landscape form creating the separation between the villages as well boundary to the surrounding rural fields. Some hedges have value; eastern hedge provides a minimal visible boundary. Existing important landscape and natural features could be retained and building orientation could be sensitive to prevailing patterns of built up from and grain of landscape. Any scheme that could offer an appropriate transition from settlement edge to wider countryside should be explored in detail.	It is unclear why the landscape assessment for Six Acres has scored significantly better than the Plough Field. Where is the evidence to support the landscape assessment of sites? A Landscape and Visual Impact Assessment (LVIA) has been prepared for the Plough Field and submitted to accompany the current planning application (December 2017). The LVIA has assessed the area including the site at national, county and district levels. The LVIA shows that there is scope for the Proposed Development of the site to be in accordance with relevant policies in that it has the potential to: <ul style="list-style-type: none"> – respond to its landscape and visual context; – have regard to the landscape character of the setting of the site; – have regard to the setting of listed buildings and conservation areas; – provide a high-quality design; – have minimal impact on the open nature, rural character and visual amenity of the Green Belt and wider countryside; – enhance the existing landscape structure; – respect the setting of AONBs; – enhance local distinctiveness;

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		<p>Conservation Area and scale. Because of other non-linear development off the Thames Road within 200 meters of the site (eg Green Lane, Gravel Lane, The Green South, Henfield View) together with the recent extension of school premises to the south east combined with the growth of the woodland to the east all contributing to creating a closed-in, flanked site, it can be argued that development of this site would not be deemed out of character but has concerned some adjacent residents. Although controversial, there is an argument that a development of high design quality, in keeping with the surrounding homes in the more densely populated centre area of the village and including a significant buffer zone to the north, would be a positive contribution to the character of the village (whilst retaining trees and improving valuable hedgerows identified in the recent local survey). If suitable in principle, valuable hedgerows and trees, identified through formal investigation, should be retained.</p>		<ul style="list-style-type: none"> – provide enhancements to green infrastructure; – provide public open space; – have a limited effect on the visual appearance of the settlement, notably in views from the east; and – provide a robust and defensible boundary to the settlement edge of Shillingford. <p>It is considered that the Proposed Development would respond positively to policies at a national and district level which focus on landscape and townscape character and local distinctiveness; visual impact; design quality, notably at the urban-rural interface; the retention and enhancement of existing landscape features; the setting of listed buildings and conservation areas; and with no detrimental effect on the function of the surrounding Green Belt. As a result, it is considered that the Proposed Development on the site would be successfully integrated into its landscape/townscape setting in the context of these policies.</p> <p>The Council’s Landscape Architect has confirmed that LVIA methodology complies with the prevailing guidance and best practice. They also acknowledge the benefits of the proposed green infrastructure, and the opportunity to achieve a high quality of design, including a landscaped edge to the village.</p>
	<p>Does the site contain any features that detract from local character?</p>	<p>Yes. This land is not maintained, farmed or used and, it is argued, is an inconsistent void near the centre of the village where housing is relatively dense. It offers no community amenity.</p>	<p>This open field adds to the more traditional character of Warborough by differentiating it from the modern structures in Shillingford. Positive boundary management of existing boundary vegetation and additional planting along the east could be explored. Further details would be required.</p>	<p>Where is the evidence which assesses Six Acres as an “inconsistent void near the centre of the village” and how has the assessment concluded that the site offers no community amenity? How has the assessment resulted in such a difference in scoring between the sites?</p>

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	<p>What would be the likely effect of development on local character – harm, enhance or stay more-or-less the same?</p>	<p>The site's location at the centre of the village could present opportunities to meet village and plan objectives but needs to be handled sensitively given its scale. As per HE comments (6.5.2): "It is clear that there would be some change in the character of the conservation area as the development would be visible from Thame Road. A change need not necessarily mean harm. This end of the village does not have a strongly defined rural edge (development continues some way to the south) nor are there important views out over the site from the conservation area or into the area from the site." Previous planning schemes have been denied because of heritage impact and argued that this site is 'edge of settlement'. However, the recent addition of the preschool buildings, the continued growth of perimeter greenery and the flanking woodland have eroded this argument. If developed, the site must minimise harm to heritage assets, add value to the village and enhance overall village character to meet plan objectives. The current master plan gives confidence that a scheme on the site can mitigate harm to heritage assets and be assimilated in the village form. The Consultation process has consistently raised the potential of this site to deliver potential benefits to the village. Opportunities raised by residents are:</p>	<p>This large flat open field adds to the more traditional farming character of the area, separating Warborough by differentiating it from more modern structures in Shillingford. Positive boundary management of existing boundary vegetation and additional planting along the east could be explored. Further details would be required.</p>	<p>Why is the assessment for Six Acres so positive, given concerns about impact on the character of the village and its conservation area?</p> <p>Has the Neighbourhood Plan considered whether the opportunities mentioned for Six Acres could equally apply to other site being promoted?</p>
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		<ul style="list-style-type: none"> • An opportunity to enhance overall village character • Deliver community facilities in a central location • Specialist housing If the site is suitable in principle, the scheme will ensure: • the set back of houses from the main road / footpath • best examples of village architecture to ensure a positive impact • a landscaped buffer zone adjacent to the northern listed buildings and Thame Road Conservation Area • siting of community facilities are located away from adjacent residences • Avoidance of street lighting • Adherence to 'Dark Sky' standards for exterior lighting. 				
Views (In/Out/Through)	Is the site visible from surrounding public roads paths and open spaces?	Flat site. Flanking buildings on north and south boundaries limit inward views (noting these personal views would be impacted). Together with visibility and vegetation and the angle of the main road, views from public streets and paths would be minimally impacted. There are glimpses across the site from the Green South between Listed Buildings (see Community Views in WSNP Character Assessment, wire Visual Impact Assessment and HE comments 6.5.2) Schemes should provide details on tree protection and		Visibility varies around the site, but because of the sites' very large size, topography & vegetation + bends of the main road around the site, it is generally deemed visible eg from the A4074 and A329. Any development would be significantly noticeable from the surrounding walks e.g. Millennium Walk: "development within visually exposed landscapes such as ... the open flat farmland will be highly prominent" SODC Character Assessment Access arrangements would involve removing the existing hedge which is on the edge of the road, further exacerbating visibility issues.		Where is the evidence to back up the claim that the site is "generally deemed visible" and that it would be "significantly" noticeable from the surrounding walks? How has the assessment arrived at its conclusions? The Council's Landscape Architect does not raise objection to the application has confirmed that LVIA methodology complies with the prevailing guidance and best practice.

		landscaping enhancement plans. Mitigation strategies (e.g. for traffic) should not compromise existing screening.			
	Is the site on a ridge or otherwise prominently located within important views in to or out of the village?	Flat site. The site has dense construction on north and south boundaries which limit inward views. The 90° main A329 & footpath views would be minimally impacted because of hedging and trees and proposed setbacks; views from rural footpaths, beyond the hedgerows, would be minimally impacted with current layout proposals; the view from the preschool would be affected; layout proposals should limit impact. (Discussed by HE in 6.5.2). Any development should retain valuable trees and hedges and enhance planting schemes; proposal to have inward green space view, and a potential onward Chiltern glimpse from the Conservation Area through the entrance should be considered. Area through the entrance should be considered.		The site is on a flat parcel of land, with significant prominence when viewed particularly to/from the Chiltern hills and from the Wittenham Clumps.	Where is the evidence which demonstrates the impact the Plough Field site would have when viewed from the Chiltern Hills and Wittenham Clumps? How would the Six Acres site be any less visible? How has the assessment arrived at its conclusions? Where is the evidence? The Council's Landscape Architect does not raise objection to the application has confirmed that LVIA methodology complies with the prevailing guidance and best practice.
	What would be the likely effect of development on views - harm, enhance or stay more-or-less the same?	The street scene of the flat site runs parallel to a straight main road and has a strong existing landscaping barrier that could be further enhanced (and not be disrupted) by development or traffic access arrangements. There are buildings flanking both sides and strong landscaping around other boundaries. The inward view at the gap in the hedge will provide a view of new, high quality housing; a new		This site forms an important 'entrance' view to W&S from the Shillingford roundabout and the road at that point clearly defines the boundary between the village and the surrounding farmland of which this field forms a part. It is very visible from the surrounding countryside & walks. Construction across the site north to south would completely remove Chiltern views from the Thame Road/footpath and would impact inward views of the village from the A4074 and footpaths. Development here would significantly harm views.	Where is the evidence which considers the site to form an important "entrance view" to the village? Where is the assessment of harm and how has it concluded that development at Six Acres would have a positive effect but development on Plough Field would have a negative effect.

		glimpse of the Chilterns is also possible.			
Movement	Are there any designated pedestrian or cycle routes across the site?	No		No	No comments.
	Is the site used informally by local people as a short cut?	Local feedback suggest that dogs are walked on the site, with access through a gap in the hedge on the Thame Road and via a footpath accessing Quaker Lane. This path is part of Footpath 7, last shown on the 1953 Definitive Map. It was originally used by Quakers to access their meeting house (demolished). CPRE and OCC have both investigated and agree that this part is still a public path as there is no evidence that it has been extinguished. OCC state: 'I have looked at the Parish Claim, Definitive Maps and Statements, and the 1965 Extinguishment Order which extinguished part of Footpath 7. It appears that the remaining section of Footpath 7 was not included in the 1968 Definitive Map and Statement, or subsequent revisions (1999 and 2006). I cannot find any other Order extinguishing the remaining section so it must have been missed off in error.' It has been gated and is currently locked. A recent adverse possession claim by an adjacent neighbour has been withdrawn.		Villagers access the site at the 'Plough' entrance to walk through to the village green or surrounding countryside. Formalising this could offer a village amenity if incorporated into existing footpath network.	Why is this element of the assessment for Plough Field not positive given that the proposals include improving an informal footpath on its eastern boundary?

<p>Ecology & Wildlife</p>	<p>Are there significant habitats on site e.g. wetland, wildflower meadows, woodland?</p>	<p>Ecological assessment provided: no significant ecology on site. Reptile survey provided. This will need to be resolved at the detailed stage if the site is suitable in principle</p>	<p>Unknown</p>	<p>Plough Field is formed of arable land, with boundary species poor and species rich hedgerows. A preliminary ecological appraisal of the site was submitted in December 2017 to accompany the planning application submission. The Council's ecologist has no objection to the application, subject to conditions. Information on ecology was provided at the public exhibition held in December 2016. We have received no additional requests for further information to be shared with the NP committee.</p>
	<p>Does the site form a link within a wider network of habitats?</p>	<p>Ecological assessment received: no significant ecology on site. Reptile survey completed. This will need to be resolved at the detailed stage if the site is suitable in principle</p>	<p>Unknown</p>	<p>Plough Field is formed of arable land, with boundary species poor and species rich hedgerows. A preliminary ecological appraisal of the site was submitted in December 2017 to accompany the planning application submission. The Council's ecologist has no objection to the application, subject to conditions. Information on ecology was provided at the public exhibition held in December 2016. We have received no additional requests for further information to be shared with the NP committee.</p>

	Is the site used by protected species such as bats, badgers or amphibians ?	Ecological assessment received: no significant ecology on site. Reptile survey completed. Various wildlife reported by neighbours including worms, bats etc. This will need to be resolved at the detailed stage if the site is suitable in principle Ecological assessment received: no significant ecology on site. Reptile survey completed. Various wildlife reported by neighbours including worms, bats etc. This will need to be resolved at the detailed stage if the site is suitable in principle	Bats sighted by several neighbours. Mitigation could be provided (but has not been proposed).	It is not robust to simply say "bats sighted by several neighbours" and then score the site adversely. Why should a site be scored negatively just because bats have been sighted? Plough Field is formed of arable land, with boundary species poor and species rich hedgerows. A preliminary ecological appraisal of the site was submitted in December 2017 to accompany the planning application submission. The Council's ecologist has no objection to the application, subject to conditions.
	Flooding Impact	Flat site with no reported issues e.g. runoff or groundwater (no flooding issues in flanking school site). A soakaway test conducted in 2017 indicates no issues.	Partially in flood plain; loss of ploughed furrows will considerably diminish water absorption. A scheme could avoid parts of site but proposals would have to be scrutinised. Sustainable urban drainage should be used to mitigate against surface water flooding and would have to be in keeping with rural landscape. Water ground levels vary tremendously throughout the year, and raise very quickly when the Thames is in flood (which is 650 meters away across this gravel-underlain floodplain.) Significant concern; requires further investigation.	Where is the evidence to support this assessment?
Traffic Impact Transport Links	Does site access present any road safety concerns?	Site lines are in excess of guidelines and do not require tree works. Local concerns remain and require: i) yellow lines to prevent on street parking for school (whilst noting that this allows school bus loading) ii) traffic calming survey for the village (funded by the developer via a S106)	Site lines for 30mph are easily achieved with removal of the hedge. This is very close to the dangerous Plough bend, just off A4074. Await traffic survey and further investigation.	It is unclear why Six Acres has scored better than Plough Field. A Transport Assessment was submitted to accompany the planning application (December 2017) for Plough Field. The County Highways Authority has since confirmed no objection, subject to conditions. Both the submitted Transport Assessment and the County's consultation response are publicly available via the Council's online planning application portal.

		<p>iii) no street lighting (to respond to light pollution concerns)</p> <p>iv) careful pedestrian route safety considerations, whilst minimising conservation area impact (the entrance to the site is in the Conservation Area).</p> <p>A detailed transport Statement must accompany full planning application. This is a matter of detail that will need to be resolved if the site is suitable in principle.</p>			
	Is there impact on traffic flow?	Near facilities and public transport links. Siting an appropriate school car park on site would alleviate school street parking/traffic issues, further opportunity to improve if accompanied by schemes such as traffic calming. This will need to be clarified at the detailed stage if the site is suitable in principle or taken forward as a project by the Council.		Scale = significant impact. Because of the volume and curves of the A329, there would likely mean moderate to significant traffic flow impact to village lanes with existing significant traffic/on street parking issues. Village-wide traffic calming and management would be required.	Where is the evidence to back up claims that there would likely be moderate to significant traffic flows impact on village lanes? Plough Field is closer to existing bus services to Reading and Oxford but this is not taken into account in its assessment, it would seem but it is identified as a positive for Six Acres. There appears to be inconsistency in approach to assessment the sites.
	Impact on current parking issues	Recent Women's Institute car school car park survey showed maximum number of cars parked on the road is 42, regularly. Siting of a fit-for-purpose car park on site adjacent to the school site with direct access to the school would improve this situation.		Because of the size of this development, a significant Increase in traffic would further impact village routes where issues are significant.	Where is the evidence to demonstrate that there would be a "significant increase in traffic" as a result of the Plough Field being developed? It is unclear why Six Acres has scored significantly better than other sites. The Transport Assessment demonstrates that the level of trip generation would have a negligible impact on the operation of the adjacent highway network. The site offers pedestrian and cycle routes to connect to existing footpaths, including offering a connection to St Laurence primary school (250m north of the site) and Warborough village.

					Therefore, very few additional car trips are expected as a result of the development.
	Distance to bus stop	0.8km walk to bus stop will require 1 road crossing (south bound) or 2 (north bound)		0.5km Walk to bus stop will require 1 road crossing (south bound) or 2 (south bound)	Why has Plough Field scored worse than Six Acres under distance to bus stop? Where is the evidence to support this?
	Are there existing pedestrian routes	Yes. Paths wide, paved and set back from the road. No road crossings required for school and pub. 1 crossing for Church, 2 for shop (both with crossing bollards). There is a public right of way in the northern part of the site which joins Quaker Lane. Nearby residents are concerned about it being used.		Yes. Paths wide, paved and set back from the road. No road crossings required for school and pub. 1 crossing for Church, 2 for shop (both with crossing bollards). Proposed links to Thame Road foot path and New Road crossing (perhaps with bollard) should be offered	No comments.
Village Amenities	Distance to Village Shop/PO/Church/Sch	0.3 shop; 0.1 school; 2 (bollard) crossing to shop; school adjacent		Including a link to footpath in NW corner: 0.6 shop; 0.3 school; 2 (bollard) crossing to shop; school - no crossings	Village amenities are within a reasonable and safe walking distance of the Plough Field also. Why has Plough Field scored worse than Six Acres? Although now superseded by the NPPF, Planning Policy Guidance Document PPG13: Transport outlines that walking is the most important mode of travel at the local level and 'offers the greatest potential to replace short car trips, particularly under 2 kilometres'. For both sites, local facilities are within a 2km walking distance from the site.
Suitability	Constraints	Constraints: None, although it is adjacent to a Conservation Area		Shillingford is next to the Thames and this land is partially within the flood zone.	Why is being adjacent to a Conservation Area not considered to be a constraint? The site is included in the South Oxfordshire Strategic Housing and Employment Land Availability Assessment (October 2017) (SHELAA number 1023) as suitable, available and achievable for residential development. It indicates that the site has capacity for 111 dwellings over the next 10 years and that the site is capable of starting to deliver new homes within the first 6 years. Why has the Neighbourhood Plan concluded something different?

	Consistent with Local Plan	Addresses Neighbourhood Plan objectives and is capable of being made consistent with the emerging Local Plan. CONCLUSION: NO KNOWN CONSTRAINTS THEREFORE SUITABLE.	The local plan (SODC Core Strategy, 2012) guides (objective 3.8) that we should 'recognises the need to take into account all aspects of climate change and minimise the risks and effects of flooding'. Larger scale development that is not consistent with current Local Plan strategy or emerging strategy without compromising Neighbourhood Plan objectives. CONCLUSION: CONCERNS DUE TO FLOOD ZONE	Clarification required on how the sites relate to the Local Plan and why Six Acres has scored better than other sites. Assessment appears to be inconsistent. The masterplan for the Plough Field has been designed around the gas main and its easement area.
	Physical factors (access, flood, contamination)	Consultation evidence submitted gives confidence that the cumulative residual traffic impact of the proposed development is not 'severe' in the context of the National Planning Policy Framework, and therefore the local Highway Authority should be able to provide a positive recommendation of support for the proposed development. CONCLUSION: SUITABLE IN PRINCIPLE	Because parts of this site sit inside the flood plain and because of the extreme sensitivity of residents to flooding, there are significant concerns. Concern about access. The site has a large gas main running East/West underground. CONCLUSION: CONSIDERABLE CONCERNS	A detailed Flood Risk Assessment of the site has been prepared and submitted to accompany the current planning application (December 2017), which provides the evidence to demonstrate that the site would not be affected by fluvial flooding from the adjacent watercourse during the 1 in 100 year plus 25% climate change event or the 1 in 1000 year event. This is essentially the equivalent to the site being located in fluvial Flood Zone 1, the area at lowest risk of flooding.
	Accessibility to services and facilities (public transport shops, education & health services)	Central location. Longer term, school capacity concern if another site develops first. (see 14.2) CONCLUSION: SUITABLE IN PRINCIPLE	Central location. This large site would exceed the capacity of the local school and strain the road infrastructure CONCLUSION: CONSIDERABLE CONCERNS	Where is the evidence to back these assertions up?
	Impacts on national and local	Impact mitigation available and proposed (see detailed Site Assessment, above)	The site is on a flat parcel of land, with significant prominence when viewed particularly to/from the Chiltern hills and from	Where is the evidence to demonstrate how the site is significantly prominent when view from Chiltern hills and Wittenham Clumps.

	<p>environment features</p>	<p>CONCLUSION: NEUTRAL</p>	<p>the Wittenham Clumps and a defining landscape form separating the villages of Warborough and Shillingford. Facilitates a Key Community View, as per Character Assessment. Part of historic 'Plough field' which previously held a world ploughing championship, which is commemorated with a statue on the site. Fiercely protected when threatened with gravel extraction because of archaeological and historic value. No mitigations proposed.</p> <p>CONCLUSION: CONCERNS</p>	<p>Where is the evidence justifying the importance of the view?</p> <p>How does the site separate the villages of Warborough and Shillingford?</p> <p>What does it mean by "fiercely protected when threatened with gravel extraction because of archaeological and historic value?"</p> <p>Significant enhancements proposed as part of the submitted planning application have been overlooked.</p>
	<p>Environment Impacts on residents and neighbouring areas</p>	<p>Impacts on nearby residents' amenity is a risk that needs to be evaluated in detail if the site is considered suitable in principle. Plan policies will need to consider how to influence proposals to ensure that they address amenities, for example: density (currently modest in relation to SODC guidelines), layout (car park near school to avoid noise and intrusion for adjacent residences), elderly (quiet), architecturally-sensitive low housing near (but set back from) adjacent listed buildings with a landscaped screened buffer zone, sensitive layout for pre-school to avoid overlooking and directly adjacent high fencing, avoidance of street lighting, 'dark sky' exterior lighting on residences and low level footpath lighting (for the school path), setbacks and additional landscape screening and avoidance of junction lighting for Thame Road neighbours.</p>	<p>Because parts of this ploughed field site sit inside the flood plain and because of the sensitivity to flooding (and the possibility that by developing here, infiltrateable, floodable land reduces and therefore the risk of flooding existing, already vulnerable, houses is increased), there are significant concerns. Concerned about traffic impact. Unknown sewerage capacity: awaiting Thames Water response. Septic approach unacceptable in flood plain. The site has a large gas main running East/West underground. There is a gas reducer station in Orchard Close and the main is part of the Southern Gas Network. It is checked from a helicopter.</p> <p>CONCLUSION: CONSIDERABLE CONCERNS</p>	<p>A detailed Flood Risk Assessment of the site has been prepared and submitted to accompany the current planning application (December 2017), which provides the evidence to demonstrate that the site would not be affected by fluvial flooding from the adjacent watercourse during the 1 in 100 year plus 25% climate change event or the 1 in 1000 year event. This is essentially the equivalent to the site being located in fluvial Flood Zone 1, the area at lowest risk of flooding.</p> <p>We are concerned that the Neighbourhood Plan Steering Committee have not adequately engaged with other site promoters as it has seemingly done with the site promoters of Six Acres.</p>

		<p>Unknown sewerage capacity: awaiting Thames Water response.</p> <p>CONCLUSION: NEUTRAL. VIA CONSULTATION THE POTENTIAL DEVELOPER HAS PROVIDED GOOD INFORMATION ON MITIGATION ON THE IMPACT ON LOCAL FEATURES THIS WILL REMAIN NEUTRAL UNTIL THE OUTLINE PLAN HAS BEEN DEBATED.</p> <p>Impacts on the adjoining Conservation Area, heritage assets and residents' amenities have been carefully evaluated and are detailed in the above Site Assessment (heritage and views). The proposals have had the benefit of a full planning application process, which has provided hundreds of pages of details, including reports from heritage experts and statutory consultee responses, on a particular scheme for this site. The allocation process should not stipulate a allocation process to limit a final design scheme, we are confident that one can be achieved which will mitigate impact on local features</p>			
Availability	Is the village's preferred housing mix available?	<p>Consultation has provided a positive response from Rectory Homes. It is a matter of detail to be debated if the site is determined suitable in principle. This should be capable of being managed by the NP policies. Rectory Homes have indicated intention to provide the majority of dwellings as 2/3 bed houses, in</p>		<p>Unknown - In this assessment will consistently assess an unknown as negative until landowner provides evidence</p> <p>CONCLUSION: CONSIDERABLE CONCERNS UNTIL LANDOWNER PROVIDES EVIDENCE</p>	<p>When has the Neighbourhood Plan Group sought information from the developer? We are concerned that the Neighbourhood Plan Steering Committee have not adequately engaged with other site promoters as it has seemingly done with the site promoters of Six Acres.</p> <p>Information was provided at the public exhibition held in December 2016. As of December 2017 all</p>

		<p>addition to providing a percentage of dwellings as a 60+ retirement mews (for example 8 out of 36 in February 2017).</p> <p>CONCLUSION: SUITABLE</p>			<p>information was publically available via the Council's online planning application portal. Furthermore, no attempts have been made to obtain information from Welbeck Land or its agents.</p>
	Is the village's affordable housing available?	<p>Consultation has provided a positive response from Rectory Homes. It is a matter of detail to be debated if the site is determined suitable in principle. SEE ABOVE</p> <p>CONCLUSION: SUITABLE</p>		<p>Promoter has proposed 40%, but no details, for example, about elderly homes.</p> <p>CONCLUSION: CONCERNS UNTIL DETAILED EVIDENCE PROVIDED</p>	<p>Is Six Acres committed to providing elderly homes? What evidence does the Neighbourhood Plan Group have to demonstrate that they have been willing to engage with the applicant? It is unclear why Plough Field has scored worse than Six Acres.</p>
	Is the village's required dwelling number available?	<p>The capacity of the site will depend on design and other detailed factors. This will need to be addressed if the site is considered suitable in principle. Consultation has resulted in Rectory Homes sharing that they plan for 36 houses (February 2017). This number is above the village requirements where 88% of residents wanted fewer than 30 houses. This is a small village and there are concerns about the strain on local facilities and school</p> <p>CONCLUSION: SOME CONCERNS.</p>		<p>82-86 houses discussed at public event held by a promoter, but this will not be fixed until detailed planning (which this promoter will not be seeking). this is larger than village requires. The site is 11.1 acres, and so the extent of the developable land may increase.</p> <p>CONCLUSION: CONSIDERABLE CONCERNS</p>	<p>It is unclear why Plough Field has scored worse than Six Acres. The site can deliver the village's required dwellings numbers and more and so should be scored positively.</p>
	Timescale (meets SODC requirements)	<p>Rectory Homes hold an option agreement with the Westwell Alcock families which has requirements for Rectory Homes to submit a planning application as soon as reasonably practicable. Intention to exercise the option 'without delay' and thereafter develop the site following the grant of an implementable planning permission by SODC. Mid-sized local</p>		<p>No stated development plan.</p> <p>CONCLUSION: CONSIDERABLE CONCERNS UNTIL LANDOWNER PROVIDES EVIDENCE</p>	<p>As per representations to the Local Plan and Neighbourhood Plan, Welbeck Land have entered into a Promotion Agreement with the landowner and have confirmed that the site is available now and could come forward for development within a 5 year period, subject to obtaining planning permission. Why has Plough Field scored worse than Six Acres? Where is the evidence to back up this assessment?</p>

		<p>developer with appointed architect; land studies complete.</p> <p>CONCLUSION: SUITABLE</p>			
Achievability	Economically Viable	<p>Landowner: The Westwell Alcock families– Developer: Rectory Homes Ltd. Rectory Homes is a medium sized house builder based in Haddenham and operates in the local housing market.</p> <p>CONCLUSION: NEUTRAL.</p>		<p>Development costs would have to factor in additional flood mitigation and protection of archaeological assets, which may reduce developable area. Landowner: Steven Cook – Nominated representative: Welbeck Land are a London based consultancy who describe themselves as having developed a particular expertise and reputation for unlocking complex planning and funding situations, to maximise potential. Once planning is passed they sell to house builders. Considerable concerns as house builder is unknown at this stage.</p> <p>CONCLUSION: CONCERNS</p>	<p>Where is the evidence which considers the achievability of the site?</p>
Other Factors to be considered	Disruption	<p>2 years to complete project from site preparation to completion of new homes. Site is central to the village and near the school where traffic is already problematic. Requires mitigation strategy if site suitable in principle.</p> <p>CONCLUSION: SOME DISRUPTION</p>		<p>No stated development plan. Site location means that A4074 construction traffic (closest arterial road) can avoid the centre of the village, although because of site size, volume is a concern.</p> <p>CONCLUSION: SOME DISRUPTION</p>	<p>Why has Plough Field scored worse than Six Acres - rationale unclear?</p>
	Timescales	<p>24 months stated development plan.</p> <p>CONCLUSION: ACHIEVABLE</p>		<p>No stated development plan but expected to be longer than other sites because of size, flood and mitigation around the gas main.</p> <p>CONCLUSION: CONCERNS</p>	<p>As above, via representations to the Local Plan and Neighbourhood Plan, Welbeck Land hold an option on the land and have confirmed that the site is available now and could come forward for development within a 5 year period, subject to obtaining planning permission.</p>
	Barriers (e.g. legal issues,	<p>If potential access solution requires school participation, then there are unknown legal issues, but these</p>		<p>This is understood to be an archaeological site (site of Roman Road), detailed investigation would be required. Mineral</p>	<p>Where is the evidence that suggests that there is a Roman Road on the Plough Field?</p>

	contaminati on)	<p>possible legal issues are unlikely to prove a barrier. Mineral resource - possible Mineral Planning Authority involvement (highly unlikely extraction sites cannot be built this close to houses/schools, need to find the facts/reference).</p> <p>CONCLUSION: MINIMAL BARRIERS</p>	<p>resource - possible Mineral Planning Authority involvement.</p> <p>CONCLUSION: CONCERNS</p>	<p>How has the assessment come to the conclusion that legal issues surrounding access are unlikely to prove a barrier? It is acknowledged that they need to find the facts and therefore it is unclear how the site has scored better than Plough Field.</p>
		<p>CONCLUSION: GREEN Suitable in principle as the site is well located at the centre of the village with few constraints other than scale and adjacent listed houses. It most closely aligns with the planning strategy as it is a more sustainable site and has the potential to deliver plan objectives and community needs if developed sensitively.</p>	<p>CONCLUSION: RED Unsuitable in principle as the site is of a scale that could change the character and role of the village within the SODC planning strategy identifying Warborough and Shillingford as a smaller village. The site is an important landscape form defining the separation between the two villages and is in a sensitive location on the edge of the village where the transition from rural to village/urban is delicate. Development of the site would be difficult to integrate into the existing village and would compromise a key community view. Additional constraints include flood plain, Grade 1 agriculture land classification, archaeology and heritage impacts.</p>	<p>Where is the evidence to support all these claims?</p>