

East Hagbourne Neighbourhood Plan

Comments of East Hagbourne Parish Council on the Reg 16 consultation representations.

This document reports our comments on the representations from Carter Jonas for Mr & Mrs Drewe. Comments on other representations are reported separately.

Carter Jonas for Mr & Mrs Drewe re Western Village Fields

Points made in the representation

Comments of East Hagbourne Parish Council are shown in blue italics.

NOTE: Mr & Mrs Drewe own land in Western Village Fields and in Coscote Fields

1.0 Introduction

1.2 Mr & Mrs Drewe are pleased to note that their very serious concerns about the lack of justification for the extensive Local Green Spaces of the pre-submission EHNP have been considered and that these have been reviewed and significantly reduced.

Noted, thank you.

Notwithstanding this, the landowners do not support the designation of their land – now referenced in the EHNP as (part of) the Western Village Fields – as a Local Green Gap in the proposed policy VC1b. It is considered that the designation of the land as a Local Green Gap is not sufficiently justified, and as such does not meet the basic conditions.

1.4 As a matter of general presentation it would also have been helpful for reference, in consultations and later planning application considerations, for the EHNP to include paragraph numbers.

We did consider this, but found it impractical in conjunction with the existing section/subsection layout.

2.0 The basic conditions and national policy

Good background information

3.0 Local Green Gap policies

3.1 Mr & Mrs Drewe object to the inclusion of their land – part of the Western Village Fields – as one of the identified Local Green Gaps (“Green Gaps”) in the submitted EHNP.

There is also a more general concern about the approach to identifying the Green Gaps, their form and overall function. The justification for the Green Gaps has its basis in a document that is not a planning document. .

We presume this reference is to the Didcot Garden Town Delivery Plan. This is not the evidence base for our NP: the evidence informing the Green Gaps is primarily the East Hagbourne Green Buffer Assessment (Appendix 10). This assessment was carried out by independent landscape consultants using a rigorous methodology and following the guidance in the DGT Delivery Plan.

3.2 There are references to the Didcot Garden Town Delivery Plan in the submitted EHNP and its supporting documentation. As at the previous consultation, it is highlighted that such references to, and reliance upon, the ‘Delivery Plan’ are inappropriate in planning policy at this time because the ‘Delivery Plan’ is not a development plan document . . .

As noted above the DGT Delivery plan has not been used as strategic policy in the NP, rather a study inspired by it has been used as the evidence base.

3.3 . . . It is considered, therefore, that references to the ‘Didcot Garden Town Delivery Plan’ should be reserved for supporting text of the EHNP only;

We agree, DGT does not appear in any policy wording

The ‘Delivery Plan’ should not be used as justification for policies or supporting evidence to the EHNP; *As noted above, we rely on our own expert studies (not publicly examined, I'm afraid).*

and, a review of the EHNP should be committed to as and when the Didcot Garden Town Local Plan process is commenced.

We will follow SODC guidance for review and updating of our plan.

3.5-3.10 Green Gaps as a proxy for Green Belt

3.5 . . . The concern regarding an attempt at a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name . . . now presents itself in response to the proposed Green Gaps.

We refer to the comments under 3.8

3.7 The purpose and function of identifying 'boundary' lines for the Green Gaps, on Figure 5, is unclear

. . .

We agree that the boundaries of the Green Gaps need to be clear and unambiguous, also that the existing description of VC1a could be improved. We have suggested, elsewhere in this document, some improved wording.

3.8 It is noted that the proposed VC1 policies do not preclude development on the identified Green Gaps . . .

We agree that the Green Gap policies do not preclude appropriate development and this itself illustrates that they are not an attempt to create a "Green Belt by another name". The assembly of NP policies set out criteria against which planning applications can be evaluated, alongside the policies of the Local Plan.

. . Mr & Mrs Drewe have no intention to make such proposals on the Western Village Fields at this time, however, in order for them to be able to manage their land in an appropriate way it is not considered reasonable that restrictive policies be placed upon them. It is considered that this could be contrary to NPPF paragraph 28 as referred to above.

As noted above, appropriate development is not precluded by a Green Gap. However, Western Village Fields are close to the historic village and it is appropriate that this should be considered in any future planning application.

It is also noted that the proposed 'safeguarding' area for the "Didcot Southern Spine Road" proposed in the South Oxfordshire Local Plan has the potential to conflict with the 'Costcote Fields' Local Green Gap and this tension is not resolved or even engaged with in the EHNP.

It is correct that this is not referenced in the NP. Inappropriate building on that land could compromise safeguarding, however a Green Gap policy does not.

3.9 Whilst the distinction between Local Green Spaces and Local Green Gaps – and their particular roles in national policy – is described on page 25 of the EHNP, it should be made clear that the function of the latter, and the subsequent policies in the EHNP, are specifically not able to explicitly preclude all development.

Comment noted, however the existing words say just that "The (Local Gap) policies do not seek to prevent development or open land uses that may otherwise be suited to a countryside location, but to ensure that proposals do not result in the integrity of the gaps being undermined"

Conservation of heritage assets; their significance and setting.

3.11 The East Hagbourne Conservation Area is referred to in the supporting text of two of the VC1 policies. The fact that it is not referred to in the other two VC1 policies provides further evidence for the confused nature and purpose of the Green Gaps as identified at paragraph 3.7 above.

The supporting text describes the characteristics of each Green Gap - in fact, they are treated as separate policies precisely to allow their individual characteristics to be described. The Conservation Area is referenced in Policies VC1b and VC1d, because these lie adjacent to the CA. The other two Green Gaps do not.

4.0 Policy VC1b – Western Village Fields Local Green Gap

4.2 There is no need to 'protect' the Western Village Fields to avoid the merging of settlements, and as has been clearly articulated in the supporting evidence to the EHNP, the disused railway line creates a "visual and physical barrier" that is a strong edge to East Hagbourne. The significance of the Western Village Fields to the rural setting of East Hagbourne is not convincingly made. . . .

The Local Green Gap policies are intended to prevent coalescence between the communities of East Hagbourne, Coscote and Didcot and to protect the distinctive individual characters and settings of these communities. It is the latter objective that dominates here. The importance of the site lies not in its distinctive features but in its tranquil character, providing a setting for the church/manor complex and foreground to the views from the railway embankment (see picture from Appendix 2, below).

The East Hagbourne Green Buffer Assessment (Appendix 10) noted that the area is vulnerable to development and structures would disrupt scenic views of the village and rural context. It rated the value of the area as substantial and its sensitivity as major.



From Appendix 2, figure 23

4.4 The need for any of the Local Green Gaps is not wholly convincing, they appear to be an arbitrary and blunt approach to managing change that would become out-of-date with changes in circumstance such as the review of Local Plans or indeed the loss of a five (or three) year supply of housing land.

We agree that this is a difficult aspect of planning to manage. We acknowledge that our initial proposals for Local Green Spaces were not always the best approach and have worked hard, including commissioning a new study, to respond to comments from you and others and come up with a better approach. We do not believe that remaining silent about the value to the community of these open country areas - value sustained by the efforts of farmers including Mr & Mrs Drewe - is desirable or is a wasted effort. We support the efforts of Didcot Garden Town to bring these issues forward and we believe the Green Gap policies are important to safeguard the setting of our own community.

4.5 Reviewing each of the other Green Gaps in turn:

- Lower End Field Local Green Gap is primarily concerned with landscape views, which are protected by other policies, but where it refers to the gap between East Hagbourne and Didcot, as was accepted by an appeal inspector, this may have some weight. However, the need for the policy to cover an entire swathe of land is not clear as the gap and views could equally be 'protected' by well designed development.

We disagree. The EH Green Buffer Assessment (Appendix 10) stated that the area is vulnerable to development. Structures which would disrupt the rural nature. Built development on the low ridge would be especially visually intrusive. We have addressed these issues in more detail elsewhere in this document, but believe that the Gap policy is appropriate and that the area proposed is the minimum needed.

- Costcote Fields Local Green Gap is a very widely drawn and again is primary concerned with the 'protection' of views, and has (or will have) a potential conflict with the Local Plan.

We note that the gap between Costcote settlement and Didcot is involved as well as the separation from East Hagbourne village.

We are aware that the area proposed as the Coscote Fields Green Gap is extensive and asked our consultants, Novell Tullett (EH Green Buffer Assessment -Appendix 10), whether they could recommend a different approach. Novell Tullett concluded that "the internal boundaries are generally post and wire fences which contribute to the sense of an expansive, open landscape". They could find no landscape grounds for subdividing the area, which is why the whole area has been put forward as a Green Gap

- Finally, the Green Corridor Local Green Gap 'doubles up' protection that is envisaged also through the proposed Local Green Spaces of Policy E1. The clear distinction of East Hagbourne and other surrounding settlements can be maintained by the disused railway line, appropriate planning around particular views identified in proposed policy VC2 and well designed development as and when it might be allocated through reviews of the EHNP.
Comments noted.

5.0 Policy VC2 - Conserving and Enhancing Important Views

5.1 Policy VC2 is a better, more precise and usable policy than those proposed at VC1a-d. The views have some recognisable significance and appropriate actions can be taken to ensure that any proposals that might come forward – either through a review of the EHNP or any other mechanism – are properly supported by evidence and an informed decision can be made.

It is respectfully suggested that an improvement can be made to the policy to help the decision maker when interpreting the policy – to ensure its efficacy and therefore meeting basic condition 'a' - and this is as follows

(underlined text in addition):

Views within the village, to and from the village, and of the wider landscape including views towards the Chilterns and North Wessex Downs AONBs, should be protected wherever possible. New development should avoid significant harm to the views listed in Table 9 of the Character Assessment and shown in Figure 6 below. Proposals that have the potential to affect a view from an identified viewpoint should be accompanied by a Landscape and Visual Impact Assessment (LVIA) that assesses proposals from those viewpoints and development should include mitigation where appropriate.

We appreciate your constructive suggestion, but do not think it is appropriate in the policy wording. It would fit more suitably in the supporting text. we will follow the recommendations of the Examiner.

6.0 Policy VC5 - Conserving and Enhancing Heritage Assets

The inclusion of proposed policy VC5 in the EHNP is understood and much of it is repetitive of national and local level policy. However, its phraseology is flawed and cannot be considered to have had sufficient regard to national policy and therefore cannot meet basic condition 'a.' There is a confusion (and conflation) of preservation and conservation; the proper wording, having regard to national policy (NPPF paragraphs 126 on), is conservation.

We have discussed this at great length. The problem is that different bodies have different views on the best wording. We have agreed the current form of wording after long discussion with SODC. Generally, conserve has been used in the context of historic assets and preserve in the context of character and setting.

There is also confusion in the policy between 'heritage assets' and 'character' and this too, does not pay regard to national policy. There is a distinct difference between the necessity to understand the significance of designated heritage assets and their setting, the desirability to conserve and enhance those designated assets

We understand the point, however both aspects are important and are, we believe, included in the policy wording.

. . and the desirability of new development making a positive contribution to local character.

The potential contribution of new building is covered in the first paragraph.

An example of the confusion created in the proposed policy is the inclusion of "the special quality of East Hagbourne" and also the identity and character of the Conservation Area. The former is not a designated heritage asset whilst the latter is not.

The East Hagbourne Village Character Assessment and Landscape Study 2017 (Appendix 2) covered all areas of the parish, not just those covered by statutory designation. We believe we cover all the areas required by national policy without unduly restricting the policy to designated assets.

Ridge and Furrow

Paras 6.3-6.9

Comments noted, although we are a little puzzled what point is being made with respect to the number of ridge and furrow survivals in the various counties. Oxfordshire, Buckingham, Berkshire and Lincolnshire have relatively few compared to Lincolnshire and Northamptonshire. We would have thought that the smaller number of survivals in our county makes those remaining more valuable. As noted, ridge and furrow is not mentioned in the policies of the NP, but it is nevertheless a heritage feature that is valued by many.
