

East Hagbourne Neighbourhood Plan

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

This document reports our comments on the representations in the EHNDP Website Report.
Comments on other representations are reported separately.

Introductory Note to the Examiner, Mr Andrew Ashcroft

Thank you for providing the opportunity for us to comment on the representations made to SODC on the East Hagbourne Neighbourhood Plan and received on Friday 4th January, 2019.

These comments have been prepared by the Neighbourhood Plan Steering Group and endorsed by East Hagbourne Parish Council.

The representations are mostly very comprehensive and detailed. We have not attempted to reproduce all the material in this document, but have instead included extracts of the key points made (in plain black text), with our comments in *blue italics*.

We do not believe that a public examination of the representations is needed - the respondents have explained their points very fully in their written submissions

We recognise the complexity of some of the issues and have explained our rationale as best we can. We trust in your expert knowledge as Examiner to weight the arguments put forward.

There are some areas where respondents have made suggestions to improve the text. We have indicated where we agree with those proposals and have in place shown suggested improved text - all subject to your review and guidance.

For ease of reference, we have arranged our response as follows:

Our response to all the representations made in the EHNDP Website Report are contained in a single consolidated document..

Comments on the representations made as individual documents (Carter Jonas for Mr & Mrs Drewe and Mr Brewer, Lawson's Orchard (including the Examiner's supplementary question), are provided as separate documents.

The Examiner's supplementary question about the DGT Green Buffer map is also addressed separately.

Sincerely,
Cllr David Rickeard
East Hagbourne Parish Council &
EHNP Steering Group

**Web Response 1:
John Corcoran (Re Site Great Mead North B)**

Extract of key points made in the representation

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

Background

I disagree with the EHNP for a number of reasons, as set out below;

1) The main aim of the report is to try and minimize property development within the village, and therefore disingenuously tries to allocate the Site 5/Greenlight development of 74 homes as fulfilling the village's requirement for housing stock for the next 15 years. This development has already received Planning Permission, and, as their own SEA report concludes, the site should be considered as part of the 'baseline', so therefore cannot, or should not, be cited as 'new development' for the plan. Therefore the EHNP should not be passed on this basis, and the allocation of potential sites, that have not yet been through the planning process, should be re-assessed.

We strongly refute the suggestion that the housing allocation has somehow been contrived. The site allocation and assessment process was rigorous and carried out by a Community Group of 20 people, including the Steering Group, all of whom displayed commendable diligence and integrity in their evaluation. The methodology and results of the process are fully documented in Appendices 8 and 8a to the Plan. The selection of site 5 was a well reasoned decision, supported by our SEA.

The SEA did consider the question of the baseline, but concluded that Site 5 only should be allocated and commented (p5) "there is evidence to suggest that local housing needs (i.e. needs arising from the Parish) would be met under (this) Option 1."

The site allocation will itself provide an addition 15% growth to the village housing numbers and infill developments have already contributed at least 11 additional dwellings, exceeding the expectations of the Local Plan.

We are confident that our site evaluation and allocation process was robust and that Site 5 was the best choice for allocation.

2) Of the six sites that underwent a detailed assessment, only two were then put forward for consideration. Of these, Greenlight (Option 1) has already received permission, so, as contested above, should not form part of the process.

We took expert guidance on whether Greenlight was eligible to be included as an allocation and were informed that it was. We note that a detailed planning application for this development has not yet been submitted.

As part of the assessment, there was supposedly consultation carried out with the Landowners. My parents, Mr. & Mrs. H. Corcoran, are the owners of Site 3; Great Mead North B; Field to the North of the Recreation Ground. Other than the initial request to assess the site, there was no further explanation, consultation, or contact from the Steering Group and Community Group.

We wrote to Mr & Mrs Corcoran on 11th December 2017 inviting their input and comments following our initial assessment of possible sites for development and enclosing a first draft of our assessment. We did not receive a response to this letter."

Nor have Mr. & Mrs. H. Corcoran, or their agent Carter Jonas, received any response, or even acknowledgement, to the letter sent on 05-04-18. See attached.

The comments from Carter Jonas were received and reviewed. We received a large number of comments and it was not practical to respond to every one individually. In accordance with the NP process, our comments are included in the Consultation Statement, Appendix H, pages 46-49

3) The assessment of Site 3 was very positive, with only two reasons being flagged up for rejecting the site. Namely; a) Access via a narrow lane, and b) impact on views. Both these reasons are rather spurious, and do not hold up to proper examination. For example, access could be gained by widening the lane, or forming a new access point. Impact on views is subjective, but can easily be mitigated through sensitive planning, such as single-storey units, low-pitched roofs etc. Despite the positive assessment, the site was then dropped from consideration, with no consultation or acknowledgement.

The purpose of the site evaluation was specifically to identify those areas of land suitable for allocation for housing within this Neighbourhood Plan. The evaluation is shown in Appendix 8a, pages 62-63 and concluded: "Unsuitable: A small site that cannot deliver housing needs in isolation. Access too narrow and widening needs additional land to be made available. Housing allocation here would preclude any expansion of village community facilities."

The question of access we consider critical. The existing lane is too narrow and it is difficult to see how other access could be achieved. The suggestion of the "Landscape Capacity Assessment for Sites on the Edge of the Four Towns in South Oxfordshire, September 2017" (Fig DID1.2, p55) that access could be gained through the Recreation Ground and football pitch is not considered viable.

4) On Page 11 of the SEA report, the capacity of Site 3 is stated as ten units, yet no basis of housing density is given to justify this figure. I would suggest that the site could easily accommodate 15-30 smaller dwellings, of the type and size that the 2016 NPC report (and the EHNP) identify as being required, namely 2/3 bed houses, bungalows, social housing.

The figure of 10 houses is approximate, however SHELAA estimated 11 dwellings. Our letter of 11th December 2017 explained the calculation: 30 dwellings per hectare based on the SODC minimum figure. We realise that SODC has since proposed different figures.

5) The SEA report also states that the site is 'somewhat peripheral to the village, 930m to the village centre'. Where is the village centre measured from? Upper Cross? This nonsensical reasoning is then dismissed by the next sentence of the report, which states 'but in this sense benefits from its location adjacent to the recreation ground'.

This is again explained in our letter of 11th December 2017. The distance is calculated from the Fleur-de-Lys pub to the centre of the site, walking, shortest route, roads & footpaths, using the same methodology for each site evaluated. The reference to the Recreation Ground is not contradictory, but simply notes that the site is convenient to the Recreation Ground.

6) The SEA report then states of the site, 'it is noted that a preferable alternative use might be as a community facility, given the adjacent recreation ground'. Therefore, the report tacitly recognises that Site 3 is indeed suitable for some form of development. The EHNP should explicitly state this, and revisit the possibility of future development, rather than dismissing the potential of the site, and the positive contribution it could make to the village's housing needs.

The NP does not proscribe development on any site that is not allocated. The potential of the site has not been dismissed, it has simply not been chosen for allocation

7) I also note that on the map (NDP page 22), Site 3 has now effectively been downgraded, having been removed from the Great Mead area defined as an 'Asset of Local Distinctiveness'. Given that the report has reassessed the site to no longer be of intrinsic value in terms of 'local distinctiveness', the site should now be re-assessed from a planning perspective.

The NP sets out policies against which future planning applications will be evaluated along with the provisions of the Local Plan.

8) The EHNP recognises that the village currently has a disproportionate number of larger detached dwellings, and future housing needs will require smaller units, with more bungalows. I agree with this assessment, and, as a property developer of small infill sites, I am concerned that if this EHNP is ratified, other than the agreed sites earmarked for development, this could effectively halt any future potential infill development for sites. Infill development should be actively encouraged by the EHNP, and the Parish Council, as it provides a source for much-needed additional units on previously under-utilised plots, and replaces older, thermally-inefficient housing stock

As noted above, the NP does not proscribe development outside the allocated site, however it does define policies to evaluate planning proposals, including for infill sites. We note that the 2017 White Paper "Fixing our broken housing market" states at 1.31 . . . "We will ensure councils can continue to protect valued areas of open space and the character of residential neighbourhoods, and stop unwanted garden grabbing."

**Web Response 2:
Oxfordshire Clinical Commissioning Group**

Extract of key points in the representation

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

Thank you for asking the Oxfordshire Clinical Commissioning Group (OCCG) to comment on the East Hagbourne NP. The OCCG commissions health services for all those who are registered with an Oxfordshire GP. We note the contents of your NP and are pleased to see the mention of healthy places for the community to grow and develop.

Noted - thank you

In terms of Strategy C1- the direction of travel for GP practices is to work in Neighbourhood clusters of around 30K-50K patients. This is to encourage sustainability and tailoring of locally commissioned health services. The pressure of Primary Care services is well documented in the press and with current retirement predictions across the health sector all areas need to look at different models of care to ensure demand is still met. You may find it beneficial to examine the Joint Strategic Needs Assessment (JSNA) on the OCC website to give more information on health and social care challenges across Oxfordshire.

Noted - thank you.

The Community Need CN1 and the resulting Strategy C1 are the result of responses to the East Hagbourne Neighbourhood Plan Community Survey and show the perceived need for GP services in the village for those without access to a car or public transport which will reliably deliver them to a GP. The OCC document referred to, "Joint Strategic Needs Assessment", reinforces this need (Section 7 Service Use - Access to Services, Page 165): "Areas of rural Oxfordshire classified as 2 miles or more from a GP surgery cover almost a third of the younger population (aged 0-15, 32%) and a third of the older population (aged 65+, 34%) in rural districts".

**Web Response 3:
Natural England**

Extract of key points in the representation

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

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Page 18 Objective E2;

we recommend rewording this objective to recognise the need to maintain and enhance landscape character, in line with paragraph 172 of the NPPF, which states that 'great weight should be given to conserving landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'.

Objective E2 is: "Maintain and enhance biodiversity".

We support the objective to maintain and enhance landscape character and believe this is covered by other policies (e.g. VC1, VC2, & VC3) which place great weight on the need to protect landscape and scenic beauty.

Our Plan is being examined under the 2012 version of NPPF, whereas the cited paragraph 172 appears in the 2018 update and is worded so as to apply to AONBs – a level of protection which unfortunately the Plan area does not enjoy.

Page 51 Policy TA2;

we recommend adding green infrastructure measures to this policy, in line with paragraph 171 of the NPPF, which requires authorities to 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. Green infrastructure that lines new and existing roads, paths or cycle ways have the benefit of creating habitat, improving habitat connectivity and as a natural screening for new development.

We support the need for green infrastructure and believe it is covered by our existing policies, with references to wildlife corridors in Policies H3, TA2 and E2. Policy TA2 is worded to require footpaths to

be “part of landscaped wildlife corridors”. In addition, Policy SD1 requires developers to “Conserve and enhance the landscape to achieve a net biodiversity gain and habitat connectivity, paying special attention to the green and blue infrastructure networks, landscape and biodiversity designations, priority habitats and protected species”.

Again, the cited paragraph 171 appears in the 2018 update to the NPPF, whereas this Plan is being examined under NPPF 2012.

We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain for the parish”.

We support the objective to provide net gains in biodiversity and believe we have addressed this through Policies SD1, E2 and H3.

Further recommendations.

Noted - thank you.

Web Response 4: Highways England

Extract of key points in the representation

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

Highways England . . . is the highway authority, traffic authority and street authority for the strategic road network (SRN).

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34.

We have reviewed this document and supporting evidence and have no comments.

Noted - thank you.

Web Response 5: National Grid

Extract of key points in the representation

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

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer.

National Grid has identified the following high voltage overhead powerline as falling within the Neighbourhood area boundary:

- 4YG Route - 400kV two circuit route from Didcot substation in Vale of White Horse to Moulsham Down Melksham in South Oxfordshire

From the consultation information provided, the above overhead powerline does not interact with any of the proposed development sites.

Whilst there is 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.

Comments noted - thank you.

Web Response 6: Nurton Developments

Extract of key points in the representation

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

1.8 It is noted that the Neighbourhood Plan has been published for consultation prior to the adoption of the emerging Local Plan for South Oxfordshire. . . . We consider that the Neighbourhood Plan process should be halted until the South Oxfordshire Local Plan has determined strategic planning issues and been found sound following examination.

This seems out of step with government encouragement to making sure every community has an up-to-date, sufficiently ambitious plan (Fixing our broken housing market, paras 1.6/7)

Section 2 Landscape Considerations

This section references the East Hagbourne Village Character Assessment and Landscape Study 2018 (Appendix 2) and mentioned the SODC assessment "Landscape Capacity Assessment for Sites on the Edge of the Four Towns in South Oxfordshire", September 2017. The more recent East Hagbourne Green Buffer Assessment by Novell Tullett, (Appendix 10) is referred to in Section 3

2.25 recognises the perceived value of the gap between Didcot and East Hagbourne and figure 3 recommends a section of land that should be kept open.

Comment noted: we observe that the suggested open space quadrant extends beyond our own Green Gap proposal

Section 3 Green Buffers

3.3 " . . The Garden Town Delivery Plan does not have the evidential support of a DPD and it should not gain status by being referred to in the EHNDP".

This comment is contrary to the guidance of the DGT delivery Plan which states (p257)

"Broadbrush principles were used to sketch the green buffers on the (DGT) landscape masterplan (see Figure 8.12) using an evaluation of local topography and field structure, relationship with the village curtilage, contiguous land parcels and boundaries formed by vegetation. This approach is sufficient to establish the principle of the green buffer but further detailed study of each location should be carried out to ensure that each area is properly considered on its own merits.

Once mapped and evaluated the extent and components of the green buffer should be included in the local neighbourhood plan of each village to ensure that this asset can be captured."

Our Plan is in conformity with this guidance

3.8 Despite common characteristics, some character areas, such as Lower End Fields, do not have a uniform character or capacity to accommodate change. To assess them uniformly can overstate or understate their ability to accommodate change, either wholly or in part.

This refers to the East Hagbourne Green Buffer Assessment by Novell Tullett, (Appendix 10)

The NT study used a robust methodology to identify the broad Green Buffer Zones. We agree that within this categorization there can be nuances of difference. This is the reason why our Green Gap covers just a part of the wider Green Buffer Zone.

3.11 Criticises the Green Buffer Assessment as being influenced by the AONB.

We do not believe this is correct - the study was carried to a rigorous methodology summarised in pages 4-7 of Appendix 10

Section 4 Policy VC1a

4.2 The premise of this policy seems to be to establish a highly protected 'no development zone' over a large area of countryside, similar to a Local Green Space designation but under a different name.

This is not a Local Green Space and does not confer the same level of protection. It nevertheless seeks to identify a valued gap and explain the reasons why it is valued, to inform and guide future planning decisions.

4.10 The landscape setting of settlements around Didcot is a wider issue that could be appropriately considered in the Didcot Garden Town Development Plan Document or at district level in the emerging Local Plan.

The NP proposals follow the guidance of the DGT Delivery Plan and can hence inform any future discussions at Town/district level.

4.13 (&4.14) . . .it is unclear as to how the extents of the area identified on Figure 5 have been chosen / drawn

Figure 5 is the map showing the Local Green Gaps. The boundaries are set by sight lines and by the explanatory text following VC1a.

We agree that the explanatory text for VC1a could be expanded and offer the following clarification:

"In defining the area to have the additional protection of a Local Green Gap, we considered the minimum area needed to protect the gap and the special landscape features outlined above. The northern boundary is defined by the straight line of Footpath 197/24, extrapolated eastwards to the East Hagbourne Parish boundary with South Moreton Parish where the boundary executes a 90° turn to the east. Because we considered only those parts of the area located within the NP Area, the eastern boundary follows the parish boundary south to where it crosses Bridleway 197/17. From there, the southern boundary returns in a direct line to the corner of the last house plot on New Road. This southern boundary was chosen because it broadly follows the line of the low ridge mentioned above and protects the most important sightlines"

We acknowledge that the boundaries of the Local Green Gap are not, in this instance, defined by hedges or other visible features. We believe, however, that the proposed area is based on boundaries that can be clearly identified from mapping and so should be able to be managed practically. Although a larger area could have been identified as 'open and tranquil rural landscape', we consider that the area proposed is proportionate for the special protection of a Local Green Gap.

Section 5. Policy VC2

5.7 questions whether some of the views should be included as "key views" and particularly questions the views towards the built area.

The views across Lower End Field looking towards the village are in our view significant in giving a sense of place and tranquillity. They are part of the village character. The views have been selected, with some input from villagers, by our landscape consultants, who seem to place as much or more importance on views towards the settlement as those out from it..

5.10 proposes revised wording for Policy VC2

We appreciate the suggestion, but prefer the existing wording, which has been developed after a lot of consideration. We will be guided by the views of the Examiner.

5.11 to 5.20 evaluate the views across Lower End Field

While the photographs are accurate, they do not convey the depth of view evident to the naked eye. Views in both directions convey a great sense of space and distance.

We do not support the suggested deletion of three of the four key views

Section 6. Housing Allocation, Policy H3

6.1 Policy H3 proposes the allocation of a site for approximately 74 dwellings. This site already has the benefit of outline planning permission (reference P17/S2469/O, granted January 2018).

6.2 It is suggested that this housing allocation has been included in the EHNDP purely as an attempt to bolster the EHNDP in terms of paragraph 14 of the Framework.

6.3 Without Policy H3 it would be difficult to argue that the EHNDP contains policies and allocations to meet its identified housing requirement. Therefore it would appear that this housing allocation has only been included so that the EHNDP is armed against the presumption in favour of sustainable development.

We strongly refute the suggestion that the housing allocation has somehow been contrived.

The site allocation and assessment process was rigorous and carried out by a Community Group of 20 people, including the Steering Group, all of whom displayed commendable diligence and integrity in their evaluation.

The methodology and results of the process are fully documented in Appendices 8 and 8a to the Plan. The selection of site 5 was a well reasoned decision, supported by our SEA.

A planning application on our second choice site (Site 2, P18/S0120/O) was subsequently refused, citing harm to local landscape character and its lack of integration and connection to the wider built context. We are therefore confident that Site 5 was the right choice.

Site 5 received outline planning approval on 26th January 2018 which gives confidence that the scheme is deliverable. However, a detailed planning application has not yet been submitted.

This development will increase the size of the village by 15%, so it is entirely appropriate that it be included in the NP as an allocated site with provisions included in Policy H3.

Web Response 7: Grainger plc

Extract of key points in the representation

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

1.2 Grainger objects to the proposals that:

- Under Policy VC1a the Land at Lower End Field is proposed to be designated as a 'Local Green Gap';
- The land at Lower End Field is proposed to be included as part of a 'Green Buffer Zone'.

2.3-2.5 Planning History

The referenced Planning Application P15/S3228/O was decisively rejected by SODC Planning Committee, The Appeal Inspector and the High Court which despite repeated applications refused a JR, saying there was no error in law

Green buffer Zones and Green Gap

4.4. Other than being currently undeveloped, no specific justification appears to have been put forward in relation to the 'Green Buffer Zone'

The evaluation leading to the assignment of Green Buffer Zones is in the East Hagbourne Green Buffer Assessment by Novell Tullett, Appendix 10.

4.6 & 4.7 discuss the status of the DGT Green Buffer Zones

- We have no comment on the speculations about the intentions of DGT.

4.8 Notwithstanding the status of the Garden Town Delivery Plan, the Green Buffer Assessment submitted as Appendix 10 to the EHNP identifies (in figure 04 of that document) "buffer zones" that extend beyond the boundary of East Hagbourne Parish, and beyond the designated Neighbourhood Plan Boundary.

The Novell Tullett study methodology (p5 of Appendix 10) notes that "Where landscape compartments are contiguous and have a strong visual connection to the village in question the whole parcel of land should be included in the green buffer"

- We believe this is consistent with what is required by the DGT Delivery Plan

We refer to the Persimmon representation, p5

"The Didcot Garden Town Delivery Plan identifies land surrounding Didcot as Green Buffer Zones. Given the indicative nature of the Green Buffer Zones defined by the Delivery Plan, the plan recommends that local Neighbourhood Plans undertake specific studies of the Green Buffers within their Parishes to define Local Green Buffers that reflect the character of villages and their visual envelope in order to ensure that the buffers respond to local variations."

This is exactly what the Novell Tullett study in Appendix 10 does.

4.9 The 'green gaps' identified in the Neighbourhood Plan are artificially curtailed versions of the buffers identified in the Green Buffer Assessment, arbitrarily drawn up to farthest extent of the neighbourhood plan boundary. The protection of valued landscape is clearly a 'larger than local' matter with wider communities of interest and one more appropriately addressed through strategic planning policy.

The Green Gaps are not artificial. While they have been informed by the Novell Tullett study, they draw on this and other site information to identify the special qualities of each gap and the appropriate area to include. We refer to the explanatory text in the NP Report.

4.10. The confused and contradictory nature of the 'Green Buffers' and 'Green Gaps' as set out in the EHNP serves to demonstrate that large-scale designations should properly be addressed by strategic planning at a wider scale (district and potentially regional), taking into account long term development requirements.

We refer again to the DGT Delivery Plan, p257, which talks about landscape setting and says:

"Broadbrush principles were used to sketch the green buffers on the (DGT) landscape masterplan (see Figure 8.12) using an evaluation of local topography and field structure, relationship with the village curtilage, contiguous land parcels and boundaries formed by vegetation. This approach is sufficient to establish the principle of the green buffer but further detailed study of each location should be carried out to ensure that each area is properly considered on its own merits.

Once mapped and evaluated the extent and components of the green buffer should be included in the local neighbourhood plan of each village to ensure that this asset can be captured."

Our Plan is in conformity with this guidance

VC1a and Basic Conditions

4.12 The broad thrust of Paragraphs 17, 109, 117 and 118 (*of the NPPF*) is that planning policies should seek to protect and wherever possible enhance the natural and local environment. However, the NPPF does not refer specifically to 'local gaps' . .

This is correct. We believe that our policies are the best way to implement the broader provisions of the NPPF

Even at inquiry, it was generally accepted even by objectors that the Grainger site does not possess landscape character and beauty in and of itself.

The appeal decision cited notes in para 25 that "The appellant contends that the site should not be classified as a 'valued landscape', which paragraph 109 of the Framework states should be protected and enhanced."

However, the inspector, at para 28, concluded ". . . . Overall, I therefore conclude that the appeal site is a valued landscape in terms of paragraph 109 of the Framework."

4.13 In being inherently anti-growth/anti-development, having the intention of permanently precluding any development within this substantial area, adjacent to a large and sustainable town in a nationally-defined growth corridor, policy VC1a clearly fails to comply with the requirements of the PPG.

We do not recognise this interpretation of our plan and refute the suggestion that it is anti-growth

4.15 et seq refers to the PPG guidance

We do not support the arguments put forward for allowing development on the Green Gap. The previous proposal was decisively rejected by SODC Planning Committee, The Appeal Inspector and the High Court which despite repeated applications refused a JR, saying there was no error in law. We believe that the NP complies with the NPPF and PPG

4.26. . . the Grainger site has also been identified by SODC's most recent landscape study under reference DID1 as having potential in landscape terms for housing (see Appendix 5 of Savills April 2018 Reps).

p25

This is incorrect. The study referred to is "Landscape Capacity Assessment for Sites on the Edge of the Four Towns in South Oxfordshire", September 2017.

On page 50 it is stated: " It is recommended that only the reduced areas as shown in Figure DID 1.2 be considered further for housing", and " Views from New Road across undeveloped fields between Didcot and East Hagbourne should be retained"

The reduced area DID1.2 (shown on p55) lies well to the south of the Grainger land.

4.28. It is clear that designation of the 'Gap' is a direct attempt to present an additional barrier to Grainger development.

The area proposed as a Gap extends beyond the Grainger land, is based on reasoned arguments, and is consistent with the findings of the landscape study referenced in 4.26

4.29 et seq outline the broader policy development within South Oxfordshire and argue that a Green Gap policy is not needed.

The fact that Didcot is a growth area makes planned development more, not less, important. We believe that a Green Gap policy is merited to give increased clarity over the more general planning policies in place today.

Web Response 8: Oxfordshire County Council

Extract of key points in the representation

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

This neighbourhood plan includes the smaller village of East Hagbourne. The emerging Local Plan as agreed by SODC on 20 December 2018 includes no target for growth in smaller villages. This is a change from the emerging Local Plan as it was at the time of the pre-submission consultation, where some 5%-10% growth over the plan period was expected.

Agreed. This Plan was prepared under the expectations of the earlier Local Plan proposal. We note that Policy H8.2 of the new version states that "Where Parish Councils choose to allocate . . .the level of growth must be commensurate with the scale and character of the village, expected to be about 5 – 10% increase . . .", so in this respect it is similar to the earlier version.

Between May 2011 and December 2017, 5 infill dwellings were delivered and a further 6 had planning permission. Outline planning permission (P17/S2469/O) was granted in January 2018 for 74 dwellings on land adjoining Hagbourne Village Hall on Main Road and identified as Site 5 (Greenlight). The sole allocation in the submission Neighbourhood Plan provides for these 74 houses (Policy H3).

We note that in respect of other sites in East Hagbourne:

- Land East of New Road - P15/S3228/O – 170 houses. This was refused and then dismissed at appeal in March 2017.
- Orchestra Land East of Blewbury Road – P18/S0120/O – 78 houses. This was refused on 18/5/18. The County Council had highways and archaeology objections and strategic concerns.
- St Hughs Rise – P17/S3798/O – 84 houses. This was refused on 14/9/18. The County Council had a highways objection and strategic concerns.
- Hagbourne Fields - P18/S1278/O - 900 houses. This is not yet determined. The County Council has highways, education and strategic objections.

The number and nature of the of planning applications listed demonstrates the pressure of potential developments on unallocated land in the Plan area. We note OCC's contributions to these planning decisions. Application P19/S1278/O has now been withdrawn by the applicant.

Policy TA2. The County Council supports this Policy but objects to the lack of reference in the supporting text to the following documents:

- Transport for new Developments; Transport Assessments and Travel Plans (OCC, March 2014). This document sets out the threshold and requirements for the production of travel plans.
- Cycling Design Standards (OCC, Summer 2017). This document provides technical solutions to support cycling.
- Walking Design Standards (OCC, Summer 2017). This document provides technical solutions to support pedestrian groups.

We acknowledge OCC's support for this policy and are happy that references to the mentioned documents should be included, but suggest it would best fit at the end of the supporting text for TA1, since TA2 refers specifically to footpaths and pavements.

We support the inclusion of health and wellbeing into the headline vision for East Hagbourne and the addition of a requirement within Policy H2 for "new homes that are suitable or capable of adaptation to facilitate lifetime independent living". We also welcome the aim to "encourage development of an improved school travel plan" within Strategy C7

Noted - thank you

Web Response 9: Historic England

Extract of key points in the representation

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

We previously welcomed the brief history of the parish in sub-section 3.1 and the reference to the listed buildings and structures in the village in sub-section 3.2.

However, we noted that the National Heritage List for England identified 45 listed buildings and two scheduled monuments in the parish as a whole. The Consultation Statement indicates that “the report has been modified accordingly” but the Plan still refers to 47 listed buildings in the parish in sub-section 3.2 and 47 listed buildings in the supporting text to Policy VC5.

Noted - we will amend the text to reflect this more precise wording.

We previously commented that we would welcome a fuller description of the special interest of the Conservation Area (the reason for its designation) and queried if this was the “unusually large collection of mid/late 17th century houses and farmsteads with original barns attached” to which reference is made in the supporting text to Policy VC2.

We have no information to answer this specific question. The Conservation area was first designated in 1970 and revised in 2000, when the Character Study, included as Appendix 6, was issued

We also suggested that sub-section 3.2 include the date of the Conservation Area Character Appraisal.

However, whilst we note (and welcome) that a new paragraph has been added to sub-section 3.2, this does not explain the special architectural or historic interest of the Conservation Area, nor, unfortunately, does the Conservation Area Character Study, at least succinctly. We note that the Study dates from 2000 and is therefore potentially in need of review. This does not mean that the Plan fails to meet the basic conditions but a review of the Study could be a community project (and would underpin the review of the extent of the Conservation Area to which Consultation Statement refers) based on the Village Landscape & Character Assessment 2017 and 2018 update.

We would be supportive of a project to update the Character Study, particularly if it included the wider areas of the parish covered in our Village Landscape & Character Assessment (Appendix 2)

We note the statement “Recent excavations in connection with development in the area indicate that there is a potentially rich archaeological heritage still to be discovered” in sub-section 3.2. It would be helpful to explain where this information can be found e.g. the Oxfordshire Historic Environment Record (HER).

Archaeology is discussed in EH Village Landscape & Character Assessment p5,12 and HER is cited. however, by its nature, HER does not record heritage that is still to be discovered.

One small positive result of the large number of planning applications in the area is that a number of archaeological surveys have been performed (some of which were ongoing at the time of preparation of the plan).

A summary is given here and could be included at the discretion of the Examiner:

As noted in Appendix 2, the Historic Environment Records include only a scatter of prehistoric artefacts in the area, such as Roman and later pottery sherds (HER 16979) and Middle Bronze Age weapons (HER 16074). However, recent excavations in connection with development in the area indicate that there is a potentially rich archaeological heritage still to be discovered. Brief excavations in connection with planning applications on Lower End Field revealed scattered evidence of settlement patterns from prehistoric and Roman times and quoted Oxfordshire County Archaeological Service,

"Recent fieldwork to the west of Didcot which has revealed extensive Roman and Bronze Age occupation along with earlier Neolithic and Mesolithic finds has highlighted, in general, the archaeological potential of the environs of Didcot, a region which was previously of little regard."

Closer to the village, results from an archaeological survey on fields adjacent to Hagbourne Village Hall will be available soon.

Although not a requirement, in itself, for the Plan to meet the basic conditions, it is a pity that the further review of buildings of merit was not undertaken as part of the evidence base for the Plan, but we welcome the Committee's positive response and would be pleased to advise further on the preparation of a local list.

We appreciate the acknowledgement of the EH Village Landscape & Character Assessment, which we believe is groundbreaking in the level of detail with which the parish was surveyed. It did (p8) note some additional buildings of interest to those included in the 2000 study and could provide a starting point for a more detailed review.

We are supportive of the aspirations to understand and care for our historic assets, and are willing to engage with other parties in updating the conservation area appraisal. In the interests of a forward-looking study, we would, however, expect any such study to engage with the wider parish, building on the EH Village Landscape & Character Assessment.

We previously queried whether or not a survey of the condition of grade II buildings in the Plan area been undertaken to ascertain whether any were at risk of neglect, decay or other threats. We note from the Consultation Statement that the Steering Group is not aware of any such survey. Again, although not a requirement, in itself, for the Plan to meet the basic conditions, it is a pity that such a survey was not undertaken (by the District Council or the Steering Group) as part of the evidence base for the Plan, but we welcome the Committee's positive response and would be pleased to advise further on a basic survey of grade II listed buildings.

Noted.

We previously queried if there had 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 streetworks etc and, if so, we suggested that this could be identified in sub-section 3.6 "Our Challenges".

We will, of course, continue to be vigilant for any such degradation, but this was not identified as a major challenge in preparing our NP

We therefore welcome the addition to this sub-section of the paragraph on "Preserving Village Character". However, we note that the 2000 Conservation Area Character Study identifies a number of issues with the village environment and makes suggestions for enhancement. Given the age of this Study we are not sure if these remain issues or whether other new issues have arisen since 2000 other than traffic and the loss of farmland, or if the Plan includes measures, where appropriate, to address these other potential issues.

We did not find any "issues" in the SODC Character Study, but there are some suggestions for enhancement. One of these - provision of more benches - is currently being progressed by the Parish council independently of the NP. We agree that vigilance is appropriate to safeguard the features identified in the Character Study and this could be added at the end of section 3.6 under "Preserving Village Character" Subject to the agreement of the Examiner, we have added a sentence to the explanatory text to policy VC5.

We previously commented that we felt the Vision read more as a statement of the purpose of the Neighbourhood Plan rather than as a vision for the Plan area. . . . This is not a matter of content - we accept that the Vision reflects the wishes of the community – but of how the Vision is drafted.

Noted. We understand the point made, but do not believe the wording should be changed at this late stage.

We are grateful for the amendments as we suggested to, and therefore welcome, Objectives VC1 and VC2 and Policy SD1

Noted, thank you

We welcome, in principle, Policies VC1a, VC1b, VC1c and VC1d, although we would like to see references to "historic significance" in the first three of these policies

These policies are presented individually so that the characteristics of each site can be explained.

We welcome Policies VC2 and VC4 and their supporting text. We also welcome, in principle, Policy VC3, which we consider largely accords with paragraph 58 of the National Planning Policy Framework 2012, 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". (We are satisfied that the required "understanding and evaluation of its defining characteristics" exists with the Village Character Assessment and Landscape Study 2017 (Character Assessment) and 2018 Update).

Noted - thank you.

We welcome, in principle, Policy VC5, although we would still prefer “conserving” and “conserve” to “preserving” and “preserve” as terminology more consistent with the National Planning Policy Framework.

We have discussed the question of terminology 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.

The policy should also include “significance” as one of the attributes in the opening paragraph as the Framework requires local planning authorities to conserve (or enhance) the significance of heritage assets.

With the agreement of the examiner, we propose including these words in the first paragraph, which would then read:

"New development including alterations to existing buildings and features should preserve or enhance the character, appearance, integrity, fabric and setting of the Conservation Area, the significance of heritage assets including Listed Buildings/Structures and the wider historic landscape in accordance with the South Oxfordshire Adopted Development Plan"

We note that outline planning permission has been granted for the development of site 5 Part of Western Village Plotlands but we welcome the requirement in Policy H3 for “Building and landscape design reflecting the vernacular of the adjoining Conservation Area”.

Noted - thank you.

We continue to welcome the identification of Tudor House allotments and Lawson’s Orchard as Significant Green Spaces protected by Policy E1a and Local Green Spaces protected by Policy E1b given their contributions to the setting of listed buildings and the identification of each as an “Important Open Space” in the Conservation Area by the Conservation Area Character Appraisal.

Noted - thank you.

Finally, we welcome the Steering Committee’s positive response to our suggestion that 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 with a review of a conservation area appraisal (which could provide the justification for an extension of the Area), 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 from neglect, decay or other threats.

Noted - thank you

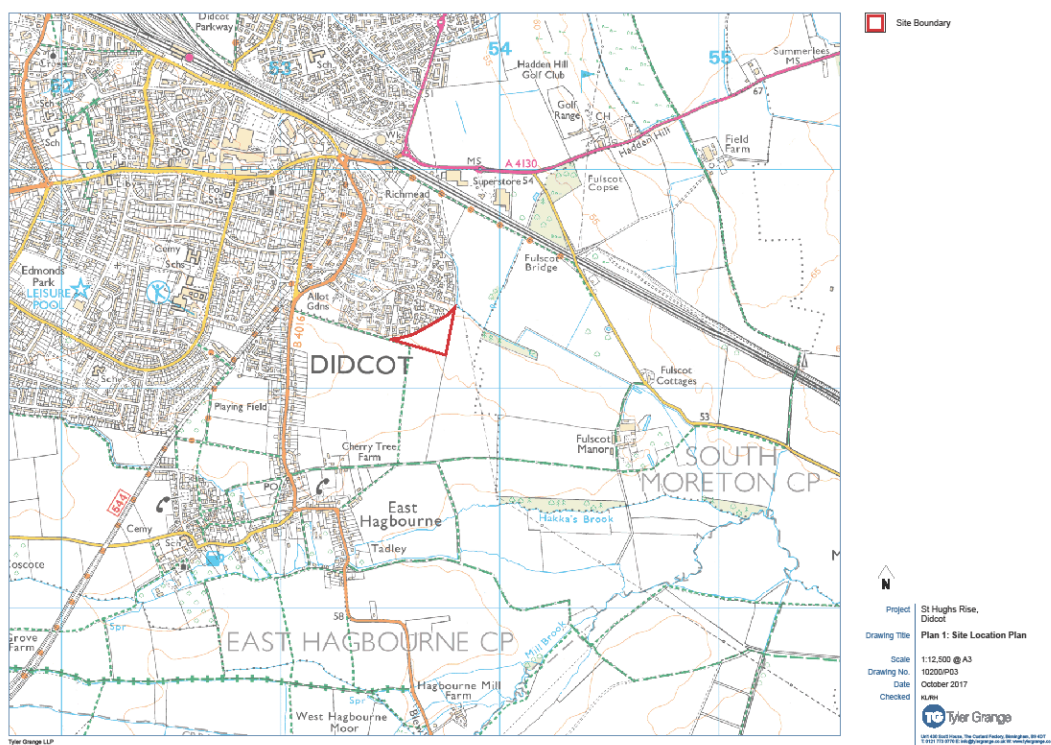
Web Response 10: Persimmon (Wolf Bond Planning)

Extract of key points in the representation

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

Background

These representations relate to a site at the north end of Lower End Field



A planning application, St Hughs Rise – P17/S3798/O – 84 houses was refused on 14/9/2018, because

- it fails to accord with the strategy for new housing development.*
- the proposed development would represent an encroachment into the open countryside detracting from the undeveloped rural character and appearance of the area.*
- The proposed development fails to demonstrate that a safe and convenient access to the highway network can be achieved.*

Overall Comments

p3. It is our position that the approach to housing provision at section 4.3.3 of the NP is inconsistent with national planning policy. We are also of the view that the approach fails to contribute towards sustainable development.

As noted below, we believe our Plan does contribute to sustainable development

Development at the outer edge of the NP Area, where it adjoins the built up area of Didcot can help to meet the housing targets of the District

We recommend a change to the plan with the inclusion of an allocation at St Hughs Rise for approximately 50 dwellings.

The site does not meet the criteria for allocation within our NP

Figure 4 – Green Buffer Zone

p3. We object to the inclusion of land east of Hughs Rise as part of the Green Buffer as shown on Figure 4 of the NP, annotated extract below.

The extent of the green buffer zone was determined by the East Hagbourne Green Buffer Assessment - Appendix 10 to the Plan. The area covered is the recommendation of the expert consultants, Novell Tullett, based on landscape considerations.

Any changes to their recommendations would be arbitrary and unjustified.

A detailed analysis of the NP approach to the buffers and gaps, including having regard to their form and function, is set out in the accompanying Green Gaps Review prepared by Tyler Grange ("TG").
See our comments below

The TG Review demonstrates the inaccuracies in the evidence base to the NP, concluding that St Hughs Rise site is not required to perform a green buffer function. Accordingly, the site should be removed from the designation as shown on Figure 4 of the NP in so far as its inclusion is not justified.

*p3 of TG notes the Didcot Garden Town objective " . . . to define a clearly defensible boundary to the landscape setting of the village"
The Novell Tullett study did not identify any clear distinction between the Persimmon land and that lying to the south. Excluding the Persimmon land would not comply with the DGT objective.*

*p4 of TG says " . . . the NP does not include policies for the Green Buffer Zone as a whole, it identifies the extent of the zone as defined by the Green Buffer Assessment"
- This is correct.*

*Section 3 of TG (p8 et seq) critiques the methodology of the Novell Tullett study.
- We do not propose to respond to this critique. Novell Tullett carried out the study based on their professional expertise as landscape architects. the Steering Group did not influence their professional judgement in preparing their conclusions.*

*Section 4 of TG refers to a proposed development by persimmon
- We have no comments on these proposals.*

The NP Assessment is inappropriate for use when identifying the suitability of individual parcels of land for development, being a strategic study that provides high-level assessment of large areas.
Agreed, the purpose is to set overall areas of the Green Buffer Zones as envisaged in the DGT plan and not to address proposals for individual parcel of land.

p5. The Didcot Garden Town Delivery Plan identifies land surrounding Didcot as Green Buffer Zones. Given the indicative nature of the Green Buffer Zones defined by the Delivery Plan, the plan recommends that local Neighbourhood Plans undertake specific studies of the Green Buffers within their Parishes to define Local Green Buffers that reflect the character of villages and their visual envelope in order to ensure that the buffers respond to local variations.
This is exactly what the Novell Tullett study in Appendix 10 does.

p6. The proposed sketch masterplan for the development of circa 50 dwellings on the Site demonstrates how development could be incorporated to respond positively to the landscape and Green Buffer context
It is not the role of the NP to evaluate individual planning proposals.

Policy VC1a – Lower End Field Local Green Gap

Figure 5 of the NP (extract below) confirms that the site is not proposed to be included within the Lower End Field Gap.
This is correct

Policy VC2 – Conserving and Enhancing Important Views

p6 The key views are illustrated on Figure 6 of the NP. Those views that are of relevance to the Lower Field Local Green Gap and the situation of the Site to the north of the area are Key Views 10 and 13.
Comments noted. We note there is no suggestion that VC2 should be amended.

Policy H1 – Housing Provision

p6. On the basis that the site does not form part of a key view and is not identified as performing a green gap function, we are of the view that the site should be allocated for housing development pursuant to our additional comments set out below.

p6. . . . we support the emphasis within the NP of planning to meet the housing requirement in the emerging Local Plan.

Noted - thank you.

p7. The spatial strategy includes provision for growth at the smaller villages, with Policy H8 suggesting the need to plan for around 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census.

We consider that Draft Neighbourhood Plan does not plan for sufficient housing numbers and it is not therefore positively prepared.

These two statements are not compatible. Our plan provides for allocated growth in excess of 15%, more than meeting the Local Plan expectations.

Accordingly, we object to this Policy as it is overly restrictive and resistant to development on sustainable and suitable sites. The Policy should be more flexibly worded to enable development on further sites in East Hagbourne which will be considered on a site by site basis.

The policy does not proscribe developments on other sites, it simply sets out criteria for evaluating any proposals.

In addition, this Policy does not enable flexibility for the development of future sites to meet increased housing requirements as a result of amendments to the South Oxfordshire Local Plan nor increased housing numbers in the village beyond the minimum requirements. This Policy as drafted is not therefore positively prepared.

Any changes to the Local Plan will be addressed when they happen - we cannot pre-empt what such changes might be. In significantly exceeding the expectations of the Local plan, we believe our NP is positively prepared.

Omission Site for Housing – Land East of St Hughs Rise

p7/8. The land to the east of St Hughs Rise in Didcot is a suitable and sustainable site for as a housing allocation.

An earlier outline planning application was considered by SODC for 84 dwellings (LPA Ref: P17/S3798/O) and a revised scheme for the development of approximately 50 dwellings is now being prepared.

It is not the role of the NP to comment on individual planning proposals.

The Persimmon land is not appropriate for allocation in this Plan because:

- The site is not closely related to, and well integrated with the village of East Hagbourne*
- The site is not easily accessible to EH services and facilities by both roads & footpaths*
- OCC have commented that St Hughs Rise – P17/S3798/O – 84 houses was refused on 14/9/18, because*
- it fails to accord with the strategy for new housing development.*
- the proposed development would represent an encroachment into the open countryside detracting from the undeveloped rural character and appearance of the area.*
- The proposed development fails to demonstrate that a safe and convenient access to the highway network can be achieved.*

This planning refusal raises doubts about achievability/viability of the site.

Web Response 11: Orchestra Land

Extract of key points in the representation from Arrow Planning Ltd
Comments of East Hagbourne Parish Council are shown in blue italics.

Representation challenges whether the NP meets the Basic Conditions:

p2 Basic Condition a requires Neighbourhood Plans to have regard to national policies and advice contained in guidance issued by the Secretary of State. In particular, this means that Neighbourhood Plans must have regard to the revised National Planning Policy Framework (July 2018) ('the Framework').

The NPPF (2018) applies to those Neighbourhood Plans that are submitted for examination after 24 January 2019. Since our NP has already been submitted for examination, it should be evaluated under NPPF (2012).

However, our Basic Conditions Statement has evaluated the plan under both NPPF versions and concluded that it complies with both.

p2. Paragraph 59 of the Framework states that in order to support the Government's objective of significantly boosting the supply of new homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The EHNDP does not aim to significantly boost the supply of new homes, nor does it allocate a sufficient amount or variety of land to come forward. The EHNDP only proposes to allocate a single site, which already benefits from outline planning permission.

The East Hagbourne NP has been developed to meet the requirements of the emerging Local Plan as it existed at the time of writing.

The October 2017 version of the emerging plan required, under Policy H10, a minimum of 500 new homes to be delivered across the 54 smaller villages through Neighbourhood Development Plans, infill development, and/or small suitable sites of up to 10 dwellings. Paragraph 5.41 further states that smaller villages are likely to deliver 5%-10% growth, based on the number of dwellings at the 2011 census, minus completions since 2011.

The allocated site in our NP will deliver up to 74 houses, representing a 15% growth on the 500 houses present in 2011. In addition, infill has already delivered 11 dwellings since 2011. We note that the latest version of the Local Plan, published in January 2019, removes these expectations from smaller villages. Our Plan therefore exceeds the expectations of the Local Plan, significantly boosting the supply of new homes.

p2/3. The Framework seeks the promotion of sustainable development in rural areas, and para 78 requires housing to be located where it will enhance or maintain the vitality of rural communities.

A second allocation within the village, on the opposite side of the village, would balance the distribution of housing throughout the settlement.

This reasoning is difficult to follow. The allocated site is well situated to integrate with the community, enabling it to grow and thrive. In contrast, a planning application on the Orchestra site (P18/S0120/O) was refused on the grounds of harm to local landscape character and because it would not be sufficiently integrated and connected to the wider built context and would fail to make a positive contribution to the quality of the character and functionality of the wider settlement

p3. The EHNDP Evidence Base shows that Site 2 performed equally as well as Site 5, which is the proposed allocation. Ultimately there was very little to choose between the sites, and the fact Site 5 already had an outline planning permission in place appeared to have weighed in favour of that site.

This is not correct. The site evaluation was carried out rigorously and objectively. The subsequent planning refusal for site 2 (Orchestra) and the still unresolved issues of site access illustrate that site 5 was the correct choice for allocation.

We therefore reject the suggestion that our Plan does not comply with the Basic Conditions.

p3. Whilst SODC have made progress with their new Local Plan and expect to submit the document in early 2019, this can only be afforded limited weight at this time. Importantly, there are significant doubts as to whether that document correctly provides for the minimum level of housing within the District.

The current housing land supply in South Oxfordshire exceeds 5 years and the new Local Plan published in January provides housing allocations in excess of minimum requirements. We believe the comments made are out of date.

p4. notes various reasons why the Plan may need to be modified in the future

We agree that the Plan is a living document and may need to change to respond to future events. However, we do not think it appropriate to try to pre-empt future developments. Our Plan already provides for a substantial growth of housing in our village in a way that will integrate and maintain the vitality of our community.

Web Response 12: Bidwells, for Catesby

Extract of key points in the representation.

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

Key issues raised:

– The East Hagbourne Neighbourhood Plan has failed to allocate any sites for development – the site chosen is already committed;

The site has outline planning permission, but a full planning application has not yet been submitted. We are advised that the site is eligible and appropriate for allocation.

– The pre-screening process used as part of the site allocation methodology does not factor in the relationship of the East Hagbourne Neighbourhood Area to the nearby growth town of Didcot and does not properly assess the sustainability of sites;

The Site Assessment process of the NP addressed the question of which sites were suitable for allocation in this Plan. The broader questions raised are beyond the scope of this Plan, which refers to the Neighbourhood of East Hagbourne.

– Coscote Fields Green Gap in its current form is not justified or appropriate

- Evidence produced by South Oxfordshire District Council, specifically the Landscape Capacity Assessment for Sites on the Edge of the Four Towns in South Oxfordshire (September 2017), has not been used to inform the Neighbourhood Plan.

We have commented below on the SODC study

- East Hagbourne Village Landscape Character Assessment and East Hagbourne Green Buffer Assessment (September 2018) both use broad areas to assess the landscape in the Neighbourhood Plan Area without sufficient justification, and they do not give due consideration to the location of sites in relation to Didcot.

We have confidence in the professional consultants, Novell Tullett, who prepared the report. The methodology they used is robust and documented in their report (Appendix 10).

These points are amplified below

1.0 Policy H1 ‘Housing Provision’ and Policy H3 ‘Housing Allocation’

1.3 . . . this site already benefits from pre-existing outline planning permission. As a result, the Neighbourhood Plan cannot be considered to be ‘allocating’ development in East Hagbourne as this is already a commitment. In this regard, the Plan adds no value.

We have taken advice on this question and believe that the site is eligible for allocation. Site 5, part of Western Village Plotlands, situated on Main Road adjacent to Hagbourne Village Hall was selected for allocation based on an objective and rigorous site assessment and evaluation process, documented in Appendices 8 and 8a, and supported by our SEA.

1.5 It must also be noted that in our view by failing to allocate a site for development the East Hagbourne Neighbourhood Plan fails to meet Basic Condition D of neighbourhood planning, which requires a neighbourhood plan to seek to achieve sustainable development. This is particularly relevant given the fact that the neighbourhood plan boundary abuts Didcot – the most sustainable settlement in the District and provides an opportunity to proactively plan for the sustainable growth of the town.

We disagree. The site allocation is, we believe, legitimate. This allocation, together with infill development will ensure that East Hagbourne achieves growth in excess of the expectations of the Local Plan. This Plan addresses the East Hagbourne Neighbourhood - the growth of the wider Didcot area is the job of the Local Plan.

1.6 Paragraph 8 of the National Planning Policy Framework (NPPF) sets out there are three dimensions to sustainable development – economic, social and environmental. Paragraph 8 clarifies that these dimensions are interdependent and need to be pursued in mutually beneficial ways. Through the non-allocation of land in the plan, both the economic and social objectives of sustainable development are not achieved and, as discussed in more detail later in this representation, there is insufficient evidence

of landscape harm to justify the non-allocation of sites, specifically our client's land, on environmental grounds.

Para 42 of national planning guidance states that a neighbourhood plan can allocate sites for development and requires an appraisal of options and an assessment of individual sites against clearly identified criteria.

This process was followed as documented in Appendices 8 and 8a. The Catesby land was judged unsuitable for allocation in this plan, because the site is not closely related to, and well integrated with the village of East Hagbourne.

1.8 Paragraph 11 of the NPPF states that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'. (our emphasis underlined). The non-allocation of any sites put forward for consideration on the edge of Didcot in favour of a previously committed site in the village does not reflect a positive approach to meeting ongoing housing need. The non-allocation of sites also means the Neighbourhood Plan does not have any flexibility built in and as set out further below, will be at risk of quickly being out of date.

The role of our NP which is for development of East Hagbourne Community. The wider growth of Didcot is the responsibility of the Local Plan. The Catesby land is not allocated for development in the Local Plan.

1.10 the Neighbourhood Plan provides an opportunity to actively plan for the appropriate growth of the town into the Parish area.

This suggestion is contrary to the Local Plan. In contrast, the allocation in Policy H3 is in alignment with the Local Plan.

1.13 Should this Neighbourhood Plan be made in its current form it will be seeking to restrict housing development on the edge of a sustainable settlement such as Didcot . . .

Our Plan does not proscribe development, but puts in place policies against which planning proposals can be evaluated

1.14 In summary, we consider that policies H1 and H3 of the Draft East Hagbourne Neighbourhood Plan do not meet the requirements of Basic Conditions D, A and E. A change is sought which allocates our clients and to the extent shown on the enclosed plans. Such an amendment would help to overcome the issues identified above and would be consistent with other policies of the plan, as discussed further below.

We disagree. We believe that the Basic Conditions are met. Allocation of the Catesby land is not possible in this Plan, because it does not comply with our clearly identified criteria.

2.0 Site Allocation Methodology

2.1 - 2.8: By using a criterion which considers how well sites are integrated into the village of East Hagbourne or accessible to East Hagbourne, highly sustainable sites will have been unjustly ruled out of consideration as defined under paragraph 7 of the NPPF

This is the East Hagbourne Neighbourhood Development Plan. It is entirely appropriate that the Plan address the sustainable development of East Hagbourne community.

2.7 . . . The generalisation that sites on the edge of Didcot are unsuitable for development is therefore unjustified.

This is a misunderstanding. Our site assessment and evaluation process considered the suitability of sites for allocation in this Plan. It does not seek to make judgements about the general suitability or sustainability of individual sites.

3.0 Green Gap Strategy

3.2 Whilst we support the inclusion of a green gap to prevent the coalescence of Coscote and Didcot, the green gap strategy in its current form is not justified or appropriate.

We appreciate the recognition that the gap protects the settlement of Coscote as well as Didcot and East Hagbourne village.

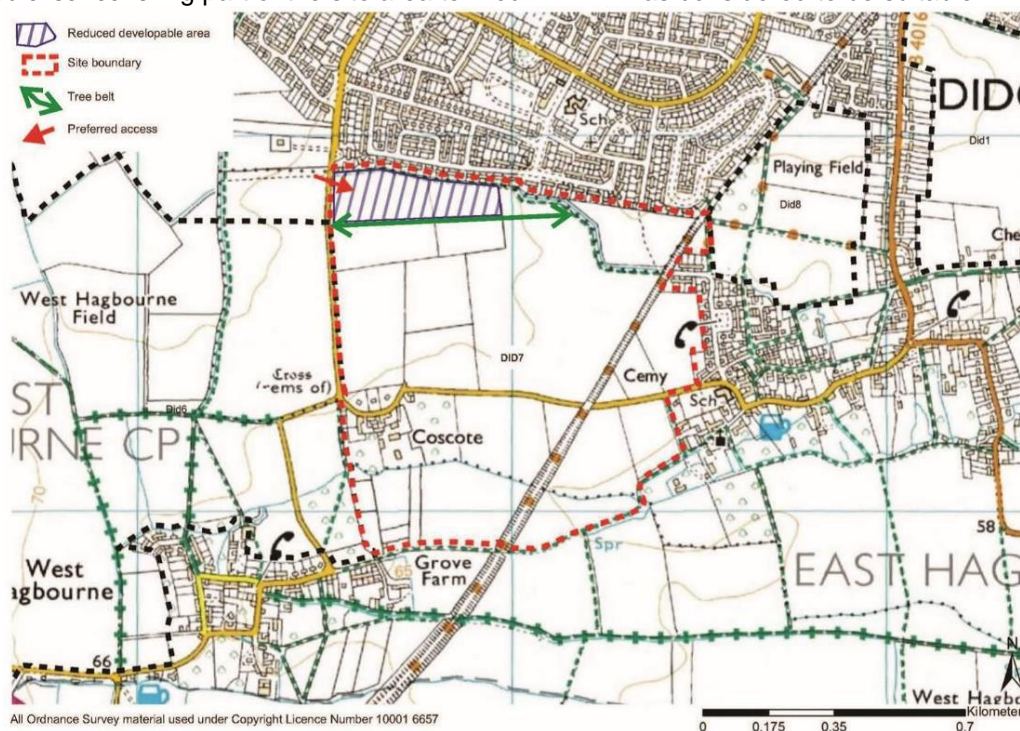
3.3 - 3.4 There is insufficient justification as to why the Buffer Zones need to be designated to the extent identified on Figure 4 of the Neighbourhood Plan. .

The below analysis looks at the evidence which should have been used to underpin policy VC1c
The reference should rather be to figure 5, which shows the proposed Green Gaps.

Landscape Capacity Assessment for Sites on the Edge of the Four Towns in South Oxfordshire (September 2017)

3.6 Of particular interest in relation to our client's land interest is site DID7 which covers land on the Southern edge of Didcot

3.7 As a whole DID7 was not considered suitable for development due to landscape sensitivity, but a 'reduced area' covering part of the site area termed DID 7A was considered to be suitable.



3.8 The conclusions and recommendations on page 81 of the report state that:

- Despite a low capacity, the reduced area as shown in Figure DID 7.2 be considered further for housing
- Developing this area will bring the edge of settlement in line with the proposed Great Western Park to the west and provide an opportunity to create a strong, vegetated edge to the built form and to link the planting along the southern edge of the Great Western Park, which will enhance the setting of the cycle route and footpath along the disused railway and possible views from the AONB.
- Views further south from Park Road across undeveloped fields between Didcot and West Hagbourne should be retained'

We are familiar with the Landscape Capacity Study commissioned by SODC and find it contains much useful information. However, the study covered a very wide area and, perhaps understandably, does not take full account of some local details. We have commented elsewhere in this document on the recommendations for access to site DID1.2. With respect to DID7, there is one area where we believe the study is mistaken and one where we disagree with the recommendations.

The LCA states that "Developing this area will bring the edge of settlement in line with the proposed Great Western Park to the west . . ."

This is based on a misunderstanding. The existing houseline along Loyd Road already aligns with the housing line to the west (Larch Drive/Cedar Close/Beech Lane).

LCA p80 indicates that the authors believed that the land to the south of this housing was intended for more building, however this area, Great Western Park Area X, is allocated for open green space and allotments - not housing, and has recently received planning permission to this effect (P18/S1491/RM,

2 Jan 2019). *Development to the east of Park Road would therefore be an intrusion into open countryside.*

The LCA further concludes " . . .and provide an opportunity to create a strong, vegetated edge to the built form and to link the planting along the southern edge of the Great Western Park . . . "

This is shown on the map as a tree belt along the southern edge of the suggested development area. We agree with the LCA that some screening to the south of Didcot could enhance the setting of the cycle route and footpath along the disused railway and possible views from the AONB, however the views towards the AONB for people in Loyd Road and uses of Footpath 189/17 along the southern edge of Didcot would be impaired.

While being aware of this wider study, in compiling our NP we have been guided principally by the East Hagbourne Village Landscape & Character Assessment (Appendix 2) and the EH Green Buffer Assessment (Appendix 10)

3.10 There is no consideration of this Landscape Capacity Assessment in the preparation of the Draft Neighbourhood Plan or its supporting evidence and we consider that the evidence suggests this area should be excluded from the green buffer.

While being aware of this wider study, in compiling our NP we have been guided principally by the East Hagbourne Village Landscape & Character Assessment (Appendix 2) and particularly by the EH Green Buffer Assessment (Appendix 10), which addresses the landscape character of East Hagbourne and its surrounds in a rigorous way.

The Green Buffer Assessment was performed by consultants Novell Tullett. We are aware that the area proposed as the Coscote Fields Green Gap is extensive and asked our consultants whether they could recommend a different approach.

The LCA notes that the area is "important open countryside" and the Novell Tullett study reached a similar conclusion: " The internal boundaries are generally post and wire fences which contribute to the sense of an expansive, open landscape". Novell Tullett could find no landscape grounds for subdividing the area. Exclusion of the Catesby land from the Green Gap would therefore not be supported by landscape evidence.

The Didcot Garden Town Delivery Plan

3.11 The Didcot Garden Town Delivery Plan is referenced on page 23 of the Neighbourhood Plan and appears to have been given weight in establishing the justification for the green buffers included in the Neighbourhood Plan.

The Green Buffers have been defined by our consultants, Novell Tullett (see Appendix 10) following a rigorous methodology and the guidance of the DGT Delivery Plan, p257.

3.13 The identification of Green Buffer to prevent the growth of Didcot leading to coalescence with surrounding villages is a strategic issue. It should not be for neighbourhood plans to effectively preclude the future growth of the District's major town.

Just as it is not our role to allocate housing for Didcot contrary to the Local Plan, we agree that the future growth of Didcot including green spaces is a strategic matter for the Local Plan. The studies performed in East Hagbourne will help inform their incorporation into the wider plan.

Recent Planning Appeal

Paras 3.15-3.21

We have no comments

East Hagbourne Village Landscape Character Assessment (Appendix 2)

Paras 3.22-3.26

We have no comments

East Hagbourne Green Buffer Assessment (September 2018) (Appendix 10)

Paras 3.27.3.34

We have confidence in our consultants, Novell Tullett, and believe their methodology to be sound and objective. We have no further comments.

4.0 Basic Conditions in Relation to the Proposed Green Buffer

4.1-4.4 Basic Condition E

Basic Condition e requires that the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.

Our Plan has been developed in close co-operation with SODC and is aligned with the Local Plan.

4.5-4.8 Basic Condition A

4.7 . . . Coscote Fields Green Gap in its current form potentially undermines the strategic policies of the adopted and emerging Local Plan through restricting growth around Didcot.

The Green Gap does not proscribe all development, it sets criteria against which proposals can be evaluated. We note that the Catesby land is not allocated for development in the Local Plan.

4.9-4.11 Basic condition D

The Neighbourhood Plan contributes towards sustainable development as outlined above. The Catesby land does not meet the criteria for allocation within this plan.

5.0 Policy VC2 - Conserving and Enhancing Important Views

5.3 . . . It also appears that all of the views identified and assessed are of 'high' or 'very high' sensitivity and are to be protected – none are assessed as being of negligible to medium sensitivity and therefore not protected.

The views were established by the consultants preparing the East Hagbourne Village Landscape & Character Assessment and have been updated in the light of some comments received during the Reg 14 consultation. The title of the figure in the report is "Key Views". We have not considered it necessary to include a map of less significant views. While there is some subjectivity in any consideration of views, we consider that the existing policy and map provide suitable criteria against which future planning applications can be evaluated.

Web Response 13: Gladman Developments Ltd

Extract of key points in the representation.

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

p2. On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

The proposed schedule for monitoring the NP is outlined in section 6.2 of the plan report. The review process is outlined in Section 6.2 and will follow the guidance of SODC

Policies VC1a – Lower End Field Local Green Gap, VC1b – Western Village Fields Local Green Gap and VC1c – Coscote Fields Local Green Gap

p3 Of the Local Green Gap policies, only the Lower End Field policy references maintaining the gap. However, Gladman are concerned that the identified gap does not demonstrate a logical boundary and this gap should be reduced to form a logical boundary.

We acknowledge that the current description of the boundary of VC1a could be improved and have proposed new wording elsewhere in this document to explain the extent of the gap more clearly.

"In defining the area to have the additional protection of a Local Green Gap, we considered the minimum area needed to protect the gap and the special landscape features outlined above. The northern boundary is defined by the straight line of Footpath 197/24, extrapolated eastwards to the East Hagbourne Parish boundary with South Moreton Parish where the boundary executes a 90° turn to the east. Because we considered only those parts of the area located within the NP Area, the eastern boundary follows the parish boundary south to where it crosses Bridleway 197/17. From there, the southern boundary returns in a direct line to the corner of the last house plot on New Road. This southern boundary was chosen because it broadly follows the line of the low ridge mentioned above and protects the most important sightlines."

The area proposed as a Local Green Gap is the minimum needed to protect the setting of the area. A key feature is the low ridge running across Lower End Field, followed by the southern edge of the Green Gap. The EH Green Buffer Assessment (Appendix 10) noted that "built development on the low ridge would be especially visually intrusive".

We refer to discussion elsewhere in this document for further detail.

p3 The other gaps are more general policies making no reference to threats of coalescence instead seeking for the gaps to perform another function. Gladman suggest that Gaps VCb and VCc should be deleted.

Noted. We believe these policies perform a valuable function as outlined in the NP report and comments elsewhere in this document.

Policy H1 – Housing Provision

As drafted, this policy does not provide the necessary flexibility to account for rapid change, such as housing needs changing, as set out in Paragraph 14 of the Framework.

The Local Plan does not set a housing allocation East Hagbourne, which is classed as a "smaller village". The housing allocation for up to 74 dwellings together with already delivered and future infill will deliver in excess of a 15% increase in the number of dwellings, exceeding the expectations of the Local Plan.

Nothing in Policy H1 sets a cap on development. We believe the second paragraph provides the necessary flexibility, however we will respond to any comment the Examiner may have.

Policy H3 – Housing Allocation

p3 The site identified through this policy for 'allocation' already benefits from outline planning permission, with the development therefore already committed. The principle of development on this site has already been set and a policy allocating the site in the EHNP is unnecessary

The allocated site was chosen following an objective and rigorous assessment and evaluation process. We believe the policy adds value in guiding the subsequent development of the site, for which a reserved matters planning application has yet to be submitted.

Further, noting that references are made in the SEA supporting the EHNP to the single allocation of Option 1 meeting the requirements of Paragraph 14 of the revised Framework, this paragraph clearly states allocations, plural, and a single allocation that has already been granted would not meet the criteria of this paragraph.

Noted, thank you. However this plan is being evaluated under the provisions of NPPF 2012.
