

Consultation Statement Appendix P

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SCHEDULE 1

Regulation 3

Consultation Bodies

Neighbourhood development plans

1. For the purposes of regulations 14 and 16, a “consultation body” means—
- (a) where the local planning authority is a London borough council, the Mayor of London;
 - (b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;
 - (c) the Coal Authority^(a);
 - (d) the Homes and Communities Agency^(b);
 - (e) Natural England^(c);
 - (f) the Environment Agency^(d);
 - (g) the Historic Buildings and Monuments Commission for England (known as English Heritage)^(e);
 - (h) Network Rail Infrastructure Limited (company number 2904587);
 - (i) the Highways Agency;
 - (j) the Marine Management Organisation^(f);

(a) See section 1 of the Coal Industry Act 1994 (c.21).

(b) See section 2 of the Housing and Regeneration Act 2008 (c.17).

(c) See section 1 of the Natural Environment and Rural Communities Act 2006 (c.16).

(d) See section 1(1) of the Environment Act 1995 (c.25).

(e) See section 32 of the National Heritage Act 1983 (c.47).

(f) See section 1 of the Marine and Coastal Access Act 2009 (c.23).

- (k) any person—
 - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and
 - (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;
- (l) where it exercises functions in any part of the neighbourhood area—
 - (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(a) or continued in existence by virtue of that section;
 - (ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(b);
 - (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(c);
 - (iv) a sewerage undertaker; and
 - (v) a water undertaker;
- (m) voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;
- (n) bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;
- (o) bodies which represent the interests of different religious groups in the neighbourhood area;
- (p) bodies which represent the interests of persons carrying on business in the neighbourhood area; and
- (q) bodies which represent the interests of disabled persons in the neighbourhood area.

Schedule 1 category	Consultee	Contact details
a)for London borough councils	Not applicable	Not applicable
b) local planning authority, county council or parish council	South Oxfordshire District Council	planning.policy@southoxon.gov.uk
	Vale of White Horse DC	Planning.policy@whitehorsedc.gov.uk
	Oxfordshire County Council:	Lynette.hughes@oxfordshire.gov.uk
	Neighbouring Parish Councils	
(c) the Coal Authority	The Coal Authority	planningconsultation@coal.gov.uk
d) Homes and Communities Agency	The Homes & Communities Agency	mail@homesandcommunities.co.uk
e) Natural England	Natural England	consultations@naturalengland.org.uk
f) Env Agency	Environment Agency	Planning_THM@environment-agency.gov.uk
g) Historic England	Historic England	Southeast@historicengland.org.uk
h) Network Rail	Not applicable	assetprotectionwestern@networkrail.co.uk
i)Highways Agency	Highways England	Zoe.Johnson@highwaysengland.co.uk info@highwaysengland.org.uk,
j) Marine Management Org	Not applicable	info@marinemanagement.org.uk
k)owners of telecoms apparatus	Gigaclear	info@gigaclear.com attention Alec Richardson
	British Telecoms plc	BT Centre, 81 Newgate Street, London, EC1A 7A.
	Cornerstone Telecommunications	EMF.Enquiries@ctil.co.uk

	Infrastructure Limited	
l) i.Primary Care Trust	Oxfordshire Clinical Commissioning Group	oxon.gpc@nhs.net Lankester Anne (OCCG) Oxfordshire Clinical Commissioning Group Anne.Lankester@oxfordshireccg.nhs.uk
l)ii.Elec utility	SSE Energy Supply	customerservices@southern-electric.co.uk
l)iii Gas utility	British Gas	customerservice@britishgas.co.uk
	National Grid	plantprotection@uk.ngrid.com Nationalgrid.enquiries@nationalgrid.com
l)iv.&v. Sewage and Water utility	Thames Water	developer.services@thameswater.co.uk
m) vol bodies	Please add as appropriate	
	Sport England	Tom.Bowkett@sportengland.org, theo.thomas@sportengland.org
	Council for Protection of Rural England	info@cpre.org.uk
n) racial, ethnic or national groups	Age UK Oxfordshire	admin@ageukoxfordshire.org.uk
	Oxfordshire Youth	hello@oxfordshireyouth.org
o)Religious groups Suggest OCVA	Diocese of Oxford	david.mason@oxford.anglican.org
p) Businesses		
q) Disabled	Enrych	info@enrych.org.uk

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Genevieve Young
Pyrton Parish Council
Christmas Cottage
Pyrton
Oxon
OX49 5AP

Our ref: WA/2006/000324/PO-04/PO1-L01

Date: 26 May 2017

Dear Genevieve,

Pyrton Neighbourhood Development Plan

Thank you for consulting us with your draft Neighbourhood Plan for Pyrton.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf.

We are pleased to see that the proposed housing allocation site ('PYR1') has been directed to an area at the lowest probability of flooding and is located within Flood Zone 1.

South Oxfordshire District Council and/or Oxfordshire County Council will be able to advise if there are areas at risk from surface water flooding, groundwater flooding and/or sewerage flooding in your Neighbourhood Plan area. Any relevant Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites.

If you have any queries about this response, please do not hesitate to contact me.

Yours sincerely,

Clark Gordon
Sustainable Places Planning Specialist

Direct dial 0203 025 8998
E-mail planning_THM@environment-agency.gov.uk

cc South Oxfordshire District Council – Planning Policy

End

PYRTON PARISH COUNCIL
PyrtonParishCouncil@gmail.com
<http://www.pyrton.org/>

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15 January 2018

Clark Gordon
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RE: Reply to Environmental Agency response to the Pyrton NP
Ref: WA/2006/000324/PO-04/PO1-L01

Dear Mr Gordon,

Thank you for your response dated 26 May 2017 regarding the Neighbourhood Plan for Pyrton.

We appreciate your consideration on flood risk and protection of the overall water environment in relation to our plan, although you had no detailed comments to make in this instance.

Thank you for the guidance included in your letter for environmental information and ideas to incorporate into our plan.

Attachment: **Environmental Agency Response to PNP.pdf**

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Your ref:
Our ref: 3999313v1

John Curtis
Chairman of Pyrton Parish Council
Lothlorien
Pyrton
OX49 5AP

16 June 2017

Dear Sir/Madam

EMERGING PYRTON NEIGHBOURHOOD DEVELOPMENT PLAN 2017-2033

This submission is made by Carter Jonas on behalf of the Homes and Communities Agency (the HCA) in respect of the allocations and policies set out within the emerging Pyrton Neighbourhood Development Plan 2017-2033 (the emerging Neighbourhood Plan) and in particular the relationship between Pyrton and Chalgrove Airfield which is allocated for development within the emerging South Oxfordshire Local Plan (Regulation 18 – Second Preferred Options) (SODC Local Plan). This letter seeks to provide further background to the HCA, the proposals at Chalgrove Airfield and the relationship with Pyrton Parish Council.

On behalf of the HCA, we are writing to support the general provisions of the emerging Neighbourhood Plan and note the comments raised regarding the redevelopment of Chalgrove Airfield. The HCA are committed to delivering appropriate and proportionate infrastructure contributions to the funding of identified local infrastructure schemes as well as providing suitable infrastructure to further mitigate any potential impacts.

The HCA is the national housing, regeneration and social housing regulation agency for England and supports the creation of successful places by increasing the supply of housing and jobs, using its programmes, land assets and regulatory role to deliver investment that drives housing and economic growth.

The HCA acquired the freehold of Chalgrove Airfield in 2016. Since this date, the HCA, supported by a large technical support team, including specialists in transport and highways, has progressed development and delivery options for this site, working closely with planning, highways and design teams at South Oxfordshire District Council (SODC) and Oxfordshire County Council (OCC). These options have been informed by stakeholders through community drop in events and workshops, culminating with an 'Enquiry by Design (EbD)' event held over 19th-23rd January 2017.

The EbD event comprised a combination of stakeholder presentations, design workshops, public exhibitions and presentations and client/consultant design sessions. The EbD event allowed the local community the opportunity to contribute to the design evolution of the site which in turn has influenced the emerging masterplan options. This event was attended well throughout and generated considerable interest leading to substantial input in the development of the site.

Since the EbD event, the HCA has considered the feedback from the community and stakeholders. It has commissioned further technical work to inform the design of the proposals and respond to the questions asked throughout the process, including specific assessments relating to transport and highways.

Alongside the stakeholder engagement undertaken to date, Chalgrove Airfield has been subject to continued site promotion through the preparation of the emerging SODC Local Plan and SODC's Call for Sites exercise resulting in the site's allocation. The HCA remain in discussion with the current site occupier Martin Baker Ltd and remain committed to securing the long term future of the business on the site alongside the wider development of the site.

Chalgrove Airfield represents a highly sustainable location for strategic development. The site is brownfield, is not located within the Green Belt or within an AONB. The HCA are committed to delivering appropriate and proportionate contributions to the funding of identified local infrastructure schemes, as well as providing suitable infrastructure to further mitigate any potential impacts. We will be able to provide further details of this mitigation upon completion of the necessary technical assessments.

The HCA would be happy to meet with Pyrton Parish Council to discuss the proposals at Chalgrove Airfield and will be in touch directly to arrange a meeting in due course.

We would be grateful if you could confirm receipt of these representations and keep us informed of the future consultation in the emerging Pyrton Neighbourhood Development Plan.

If you have any queries on any points covered in this submission, please do not hesitate to contact me or my colleague, Kieron Gregson (kieron.gregson@carterjonas.co.uk / 020 7016 0735).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Nick Taylor', with a horizontal line drawn through the middle of the signature.

Nick Taylor
Partner

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9 December 2017

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**RE: Reply to the Homes and Communities Agency (HCA) responses to the
Pyrtton NDP made on their behalf by Carter Jonas**

Dear Mr Taylor,

We welcome your support to the general provisions of our emerging Neighbourhood Plan and also the statements that the HCA is committed to the delivery of appropriate and proportionate infrastructure contributions to the funding of identified local infrastructure schemes as well as support to mitigate potential impacts.

However, we remain opposed to the development of Chalgrove Airfield as we believe that it is not compliant with two (2) specific areas (**STRAT9** and **TRANS3**) detailed in SODC's Local Plan, for the following reasons:

STRAT9 - The Chalgrove Airfield development is unsound and fails to comply with the Duty to Cooperate for the following reasons:

- 1. OxLep Strategic Economic Plan:** This states that housing and economic growth should be centred around the Oxford Knowledge Spine (Appendix A, fig 1). Chalgrove, however, is located a substantial distance from this area and is not within 'reasonable' daily commuting distance of Oxford City. This site does not, therefore, address the Oxford City unmet need of 3,750 new homes or comply with Oxlep Strategic Economic Plan.
- 2. Sustainability:** The Local Plan does not comply with **SODC's** own sustainability appraisals which indicate that the Chalgrove Airfield site has very poor sustainability, significantly poorer than other sites closer to Oxford City. These sites have been dismissed

on the basis of them being within the Green Belt, yet Green Belt development is planned at Culham, Berinsfield and Wheatley. Furthermore:

- a) The Chalgrove development does not meet the key components of SODC's **Transportation Strategy**, namely that *'new development should be located close to, or adjacent to existing and proposed transport infrastructure and public transport that can be augmented to service an increased demand for travel. Development should be designed to promote cycling, walking within and outside the development to workplaces, community facilities and transport hubs'*. Chalgrove would require significantly greater road infrastructure development than sites closer to Oxford City, at significant cost, and some of which would be on Green Belt land.
- b) The increased traffic from Chalgrove, essentially a commuter car based settlement, will create serious carbon emission issues that conflicts with the objective of a **'Low Carbon Oxford'** and the aim to reduce carbon emissions by 40% by 2020.
- c) Even if new road infrastructure is deliverable and put in place, serious issues in surrounding villages such as Pyrton, Cuxham and Shirburn would occur. Pyrton would, in fact, become a rat run with many commuters from Chalgrove taking a shortcut to the M40 by using Knightsbridge Lane and passing through an SSSI into the village. This minor road is bordered by a strip of woodland supporting one of the largest British populations of the very rare plant species green hound's tongue *'Cynoglossum germanicum'*.
- d) It would significantly increase the risk of flooding in Chalgrove village, the current plan to mitigate this being impracticable.
- e) The Chalgrove development would have a very serious impact on community cohesion.
- f) Noise from the runway is likely to be a serious issue to residents on the new development.
- g) More houses are allocated via the proposed development at Chalgrove than are required in the Growth Board's own scoping of housing need. The plan can align housing need without inclusion of the undeliverable proposal for a 3,000 house New Town at Chalgrove.

3. Proportionate Evidence: No attention has been paid in the emerging Local Plan to the considerable negative feedback which was given on the Chalgrove proposal during the consultation process.

4. Oxford-Cambridge Expressway: Although this has been mentioned in the plan the potential magnitude of this growth corridor is not indicated. The research on routes for the Expressway and the potential Varsity Rail Link between Oxford and Cambridge could make alternative sites viable for sustainable brownfield development. The fact that this has not been explored in the Local Plan makes it unsound.

5. The plan to develop Chalgrove Airfield fails to satisfy five of the Local Plan's own objectives:

OBJ 1.2: "Support rural communities and "their way of life", recognising that this is what attracts people to the district."

Chalgrove Airfield development would have a disastrous effect on the Chalgrove Village community and the commuter traffic resulting from this development would destroy the rural environment of neighbouring villages.

OBJ 4.2: Make sustainable transport, walking and cycling an attractive and viable choice for people, whilst recognising that car travel and parking provision will continue to be important in the rural District.”

This is not the case as, unlike sites closer to Oxford, walking or cycling from the Chalgrove Airfield development to the likely places to work in Oxford City, or the Science Vale would be entirely impractical.

OBJ 5.2: “Support development that respects the scale and character of our towns and villages, enhancing the special character of our historic settlements and the surrounding countryside.”

The Chalgrove Airfield development would quadruple the size of the Chalgrove community and irreparably damage the character of the area, in particular, the ancient villages and Conservation areas of Cuxham, Pyrton and Shirburn which will become rat runs to the M40.

OBJ 7.2: “Conserve and enhance our rich and varied historic assets and their settings, celebrating these as some of our strongest attributes:

The Chalgrove Airfield development would irreparably damage the only historical battlefield site within the South Oxfordshire area

OBJ 8.2: “Minimise carbon emissions and other pollution such as water, air, noise and light, and increase our resilience to the likely impact of climate change, especially flooding.”

The Chalgrove Airfield development would create significantly more carbon emissions than any of the other strategic site options and would exacerbate the already serious flooding issue in Chalgrove village.

TRANS3

Pyrton Parish Council is aware that the HCA is pledged to support the funding of a Watlington Relief road, provided that the Chalgrove Airfield development goes ahead and whilst we are obliged to include a safeguarded route across PYR2 to be compliant with the draft SODC Local Plan, we do have the following queries about such a road:

1. A recently published **CPRE study entitled ‘The end of the road? Challenging the road building consensus’** shows that so called relief roads fail to deliver their often-claimed benefits...specifically they
 - a) induce traffic... generating a lot more traffic than the problem they were intended to solve,
 - b) lead to permanent and significant environmental and landscape damage, and
 - c) show little evidence of economic benefit to local communities.
2. There appears to be insufficient evidence of the need for a bypass around Watlington and it is not identified in the **Local Transport Plan**.
3. We have not yet seen sufficient research conducted on the effects of this bypass and it appears at odds with the soundness tests in paragraph 182 of the **National Planning Policy Framework**.
4. Funding (estimated between £13,000,000 and £20,000,000) and deliverability of this new road are questionable. A road of this length would have to rely on funding created by unsustainable development resulting in the loss of prime agricultural land (included in **Natural England’s ‘Chilterns Escarpment North’ Conservation**

Target Area important for its significant contribution to the following Higher Level Stewardship Objectives: Biodiversity, Historic Environment, Landscape and Access).

5. Other options of a route for a new road around Watlington have not been examined.
6. By taking the safeguarded route to the northwest of Watlington it will cut through Pyrton parish land and a large agricultural field which currently provides a green gap between the two settlements preventing their coalescence. The **Kirkham Report** ruled against any development on the land between Pyrton lane and Watlington Sports field (known as PYR2) '*due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape*' (p. 42).
7. By running the safeguarded route along Pyrton Lane and ending it on the unnamed road into Pyrton from the B4009 it would have a detrimental impact, through light, air and noise pollution, upon Pyrton's conservation area and the historic environment and setting of the Grade II* listed Pyrton Manor and Shirburn Castle. We have doubts about the route ending on a road linking with the Oxfordshire Way (popular with walkers, cyclists and riders) and also adjoining Shirburn Castle's Registered Parkland and a line of ancient and protected Holme Oak Trees.
8. A road to the northwest of Watlington (and resulting development) is likely to exacerbate current problems of flooding within Pyrton village.

We note that the HCA is happy to meet with Pyrton Parish Council to discuss these issues and at a recent meeting, hosted by Watlington Parish Council, Ken Glendinning stated to our Chairman, that he would be in contact soon to arrange such a meeting.

Attachment: **HCA Response to PNP.pdf**



Historic England

John Curtis

Chairman of Pyrton Parish Council
Lothlorien
Pyrton, OX49 5AP

Our ref: HD/P5355/
Your ref:

Telephone
Fax 01483 252040

14th June 2017

Dear Cllr Curtis,

Pyrton Neighbourhood Development Plan 2017-2033

Thank you for your e-mail of 5th May advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments.

The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.

We welcome the references to the history of Pyrton in paragraphs 4.1 1 ad 4.2 1 and are pleased to note that the heritage is greatly valued by residents, Following this whetting of the appetite, we welcome sub-section 4.3 on historical context. However, it would be helpful to say a little more about the conservation area; e.g. when was it designated ? Has the designations been reviewed ? What is its special interest (the reason for designation) ? Is there a character appraisal and/or a management plan for the conservation area ?

In addition, whilst we welcome the identification of the designated heritage assets (listed buildings, scheduled monument, registered historic park and garden and conservation area), we would welcome further reference to the archaeological interest of the parish. We note that the shrunken settlements of Golder, Clare and Standhill have been identified as likely to be of high archaeological potential and interest, but what information is available from the Oxfordshire Historic Environment Record and recently completed Historic Landscape Character Assessment ?



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Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



The National Planning Practice Guidance states “... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In

- 2 -

addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions”.

Is there a list of locally-important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity and form an important part of the evidence base for the Plan.

We are pleased to note that the local community values Pyrton’s historic character and heritage assets and that conserving the character and appearance of the area and protecting heritage features are high priorities for parishioners.

We consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. Has there been any character assessment of the parish or is there any form of design advice e.g. a Village Design Statement (Objective d. would suggest not)?

Is the condition of heritage assets in the parish an issue? Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II buildings. Has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc?

We feel that the Vision could be clarified – presumably it is intended to set out how the community would like the parish of Pyrton to be at the end of the Plan period, or perhaps further into the future, with the Plan being a mechanism to help achieve that vision. Given the support from the local community for the conservation of the parish’s historic environment, we are a little surprised not to see a direct reference within the Vision to the conservation and enhancement of heritage features. However, we welcome Aims a. and d. Objectives a.(ii and iii) and d.

We welcome Policy BNE1 on landscape character, although we would welcome a reference in the supporting text to the Oxfordshire Historic Landscape Character Assessment. We also welcome Policy BNE2 on the historic environment in principle, although as currently written, we feel that it adds very little to South Oxfordshire Local Plan Policy XXX. The National Planning Practice Guidance advises neighbourhood plans to include policies to “*put broader strategic heritage policies from the local plan into action at a neighbourhood scale*”. The policy should also cover non-designated heritage assets.



We welcome Policy BNE3 on local green spaces, particularly the protection afforded to Area C for its contribution to the conservation area and setting of Shirburn Registered Park. Are there other green spaces that perform a similar function or are historic in their own right?

We also welcome, in principle, Policies D1 and D2 setting out design criteria, but clause 2 of the policy implies that it is only to apply to the identified site allocations. We would welcome a slightly more detailed policy that seeks to ensure good design in developments throughout the Plan area, in accordance with paragraph 58 of the National Planning Policy Framework, which states “...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area”.

However, the paragraph continues “Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.” It is therefore important that there is a characterisation/design study to underpin this policy.

We welcome Policy D3, particularly clause e.

We have assessed the sites proposed as housing allocations against our records of designated heritage assets. According to those records there are no designated heritage assets on or near Site A. Site B is adjacent to the Grade II Registered Historic Park or Garden of Shirburn Castle and Site C is adjacent to the Conservation Area.

We do not consider that the one or two well-designed houses proposed for Site B would be likely to have a detrimental impact on the significance of Shirburn Castle and therefore have no objection to the allocation of this site.

We welcome the requirement in Policy SA3 that “the owner or developer submits a proportionate design and access statement to explain why the proposed scheme is acceptable and in keeping with the nearby conservation area”, but we would prefer there to be a more direct requirement that the proposed scheme is not harmful to, and preferably enhances, the setting of the conservation area. Subject to that, we have no objection to the allocation of this site.

Nevertheless, the Historic Environment Record should also be consulted for any records of archaeological finds on any of the proposed sites.

Finally, the preparation of the Neighbourhood Plan offers the opportunity to harness a community’s interest in the historic environment by getting the community to help add to the evidence base. We welcome the proposed action to review the extent of the conservation area. Other potential actions could include the preparation of a comprehensive list of locally important buildings and features or a survey of grade II buildings in the parish to ascertain their condition and whether or not any are at risk from neglect, decay or other threats.

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Pyrton, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,

A handwritten signature in black ink that reads "Martin Small". The signature is written in a cursive, slightly slanted style.

Martin Small
Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

E-mail: martin.small@historicengland.org.uk

Appendix: Sources of Information



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



The National Heritage List for England: a full list with descriptions of England's listed buildings:
<http://list.historicengland.org.uk>

Heritage Gateway: includes local records of historic buildings and features
www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment <http://hc.historicengland.org.uk>

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/> has information on neighbourhood planning and the historic environment .

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever.

<http://risk.historicengland.org.uk/register.aspx>

Placecheck provides a method of taking the first steps in deciding how to improve an area.

<http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing,

<http://www.historicengland.org.uk/publications/knowning-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information.

<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by Historic England, uses good practice to support the creation and management of local heritage lists.

<http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies

<http://www.helm.org.uk/server/show/nav.19604>

Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place

<http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>



Brook Cottage, Pyrton, Nr Watlington, Oxon OX49 5AN
Tel: 01491 612437

5th October 2017

Dear Mr Small

On behalf of Pyrton Parish Council and our Neighbourhood Plan Steering Committee I would like to thank you for your letter of 14th June in response to the consultation on our Neighbourhood Plan.

Our small community feels passionately about the heritage of our ancient village and parish and we are extremely grateful for the advice and recommendations you have given us which have been used to inform our Neighbourhood Plan.

Pyrton's Conservation Area was first designated in 1984 and, as was then usual, no Appraisal document was produced at that time, nor have the boundaries of the designated area been reviewed by SODC since. As a result, in April of this year, Pyrton's Parish Council commissioned a Conservation Area Appraisal to be produced by Dr Nicholas Doggett, FSA, IHBC, MCIfA, Managing Director of Asset Heritage Consultant. The purpose of this document is to define the special interest of the Conservation Area, including proposals for extending the boundaries of the currently designated area and for the enhancement of its character and appearance. It explains the significance of the area and seeks to ensure its special interest and character is preserved and enhanced for future generations. An application will shortly be submitted to the conservation officer, Samantha Allan, at South Oxfordshire District Council to ratify this appraisal document. In the meantime, the working document will be included as an appendix of our Neighbourhood Plan.

Thank you again.

Yours sincerely

Lucy Brittain
Parish Councillor

Date: 16 June 2017
Our ref: 214637
Your ref: Pyrton Neighbourhood Development Plan Consultation



pyrtonparishcouncil@gmail.com

BY EMAIL ONLY

Hornbeam House
Crew e Business Park
Electra Way
Crew e
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam,

Pyrton Neighbourhood Development Plan Consultation

Thank you for your consultation on the above dated 03/05/2017

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

We note that, having considered a number of alternative sites, the Neighbourhood Plan allocates 3 sites for development. As recognised in the Sustainability Appraisal, and the plan itself, one of the key issues for development is the location within the setting of the Chilterns AONB, and consequently the potential for negative impacts on this protected landscape. The policy 'BNE1 Landscape Character' is therefore welcomed. With regard to Policy SA1, which allocates the former MOD site for development of around 15 houses, we advise that the policy emphasises the need for a Landscape and Visual Impact Assessment (LVIA) to be submitted with applications, and also the need for applications to take into account the recommendations of the SODC Landscape Capacity Study in relation to this site (as quoted in the contextual text for Policy SA1). We also advise that the PNP take advice from the Chilterns Conservation Board; their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to guide development here. Equally, whilst of a smaller scale, we would advise that the other allocated sites which also sit within the setting of the AONB should also be subject to LVIA.

We note that there is no policy with regards to conservation and enhancement of biodiversity, and recommend that this is added within the built and natural environment policies, seeking a net gain in biodiversity in line with paragraph 109 of the National Planning Policy Framework. Part of the Neighbourhood Plan area is within the 'Chilterns Escarpment North' Conservation Target Area (CTA) (<https://www.wildoxfordshire.org.uk/wp-content/uploads/2014/02/Chilterns-Escarpment-North-CTA1.pdf>) and biodiversity enhancements should be designed where possible to help achieve the aims of this CTA.

For clarification of any points in this letter, please Rebecca Micklem on 020822 57686. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely,

Rebecca Micklem
Sustainable Development
Thames Team

PYRTON PARISH COUNCIL
PyrtonParishCouncil@gmail.com
<http://www.pyrton.org/>

John Curtis, Chairman
Lothlorien
Pyrton OX49 5AP
Telephone 01491 612039
john_curtis@outlook.com

Genevieve Young, Clerk
Christmas Cottage
Pyrton OX49 5AP
Telephone 01491 612203
g.b.c.young@gmail.com

15 January 2018

Rebecca Micklem
Natural England
Sustainable Development
Thames Team
E-Delivered: consultations@naturalengland.org.uk

RE: Reply to Natural England response to the Pyrton NP
Ref: 214637

Dear Ms Micklem,

Thank you for your letter dated 16 June 2017 regarding the Neighbourhood Plan for Pyrton.

We appreciate your consideration regarding the conservation, enhancement and management of the natural environment in relation to our plan.

Regarding the former MoD site: We will emphasise the need for a Landscape and Visual Impact Assessment to be submitted with applications as well as the criteria that all applications take into account the recommendations of SODC Landscape capacity Study. We will also take advice from the Chilterns Conservation Board with regards to the proposed development site and their impact on the AONB landscape. Their guidance will be especially valuable given their knowledge of the immediate and surrounding area.

Thank you for the guidance included in your letter for the inclusion of a policy with regards to conservation and enhancement of biodiversity and we will aim to include a section within the built and natural environment policy chapter so that we are in line with paragraph 109 of the National Planning Policy Framework. The intention of the inclusion of biodiversity enhancements is to help achieve the aims of the Chilterns Escarpment North Conservation Target Area.

Thank you for your offer of further clarification of the points included in your letter and for providing your contact details.

Attachment: **Natural England Response to PNP.pdf**

**County Hall
New Road
Oxford
OX1 1ND**

**Director for Planning and Place
– Susan Halliwell**

16 June 2017

Pyrton Parish Council
By email: john_curtis@outlook.com

Copy: planning.policy@southoxon.gov.uk

Attn: John Curtis, Chairman

Dear Pyrton Parish Council

Pyrton – Pre-Submission Draft Neighbourhood Plan

We have noted that you are consulting on a Draft Neighbourhood Plan <http://www.pyrton.org/home/>, although we are not aware that we have received direct notification. We have prepared these officer comments in good faith but these do not restrict our ability to raise matters at the formal Submission stage of your Neighbourhood Plan.

As noted on page 11 of your draft, the village of Pyrton is neither defined as a larger nor smaller village, and is therefore an ‘other village’. Your proposal is to provide for 15-20 houses over the plan period: allocating 15 on one brownfield site (PYR1 ‘former MOD site’); up to 2 at ‘land between Old Vicarage Cottage and the Lodge House’ and 1 at ‘Land at New Farm’. You also propose to define three sites as Local Green Spaces.

One of the sites proposed as a Local Green Space (PYR2) is a site where there is proposed safeguarding for a road in the Local Plan Second Preferred Options (a bypass around Watlington). The draft Neighbourhood Plan therefore appears inconsistent with the strategic policies of the emerging Local Plan and we would be interested to see Pyrton Parish Council’s comments on the Second Preferred Options. Our comments on the road proposal are set out in the attachment. If the road is required to mitigate the effects of development, then the County Council would potentially object to a neighbourhood plan which did not recognise the safeguarding.

It is also possible that part of this same site PYR2 could be needed for expansion of Icknield Community College. Our comments on the issues surrounding the primary school and secondary school are set out in the attachment. The County Council might therefore object to a neighbourhood plan which sought a Local Green Space designation over land potentially needed for school expansion.

The Local Green Space for PYR2 also conflicts with a current planning application P16/S2576/O, for 100 residential dwellings, to which the County Council lodged an objection in October 2016.

The Watlington pre-submission draft neighbourhood plan proposes development in accordance with an edge road in a manner which would appear to rely on the use of

part of PYR1 as well as PYR2 for the edge road. The cross-boundary implications of these neighbourhood plans will need to be considered. We have responded on the Watlington pre-submission draft neighbourhood plan by letter dated 2 June 2017 and would be interested to see Pyrton Parish Council's response on that plan.

Given the above, as officers of the County Council, it is our informal view that it would be preferable for the submission and examination of the Neighbourhood Plan to await the outcome of the Local Plan, or for the proposal for Local Green Space (Policy BNE3) at PYR2 to be deleted, and the proposal for development at PYR1 reconsidered in relation to whether a road is necessary here. We expect that this will involve discussion with Watlington parish, so that the two neighbourhood plans are aligned, and discussion with the District Council in relation to the Local Plan.

Yours sincerely

Lynette Hughes

Lynette Hughes
Senior Planning Officer

Email: Lynette.Hughes@oxfordshire.gov.uk

General Email: southandvale@oxfordshire.gov.uk

Attachment to Letter on Pyrton draft Pre-Submission Neighbourhood Plan June 2017

Transport Strategy Comments

Site PYR2 – Proposal for Local Green Space

This Pyrton draft Neighbourhood Plan makes reference to the planning application that has been submitted for 100 houses at the site (P16/S2576/O), states a preference for the retention of a green buffer to reduce the risk of coalescence between Watlington and Pyrton and notes that there is local resistance to the development of the site. It proposes that the site is made a 'Local Green Space'.

The Watlington draft Neighbourhood Plan, which was recently consulted on, indicates that PYR2, along with PYR1, is in a sensitive landscape area, but indicates that the alignment of an edge road would potentially continue through both PYR2 and PYR1.

The South Oxfordshire Local Plan Second Preferred Options proposes to safeguard a route for an edge road or bypass which involves PYR2.

The County Council has raised a number of queries about the proposed safeguarding of the road in its comments on the Local Plan Second Preferred Options. Essentially, the County's view is that further work is necessary to assess whether a road is necessary, related to the effects from housing growth at the proposed Chalgrove Airfield allocation. The relevant paragraphs are copied below.

(Para 96) We understand that these new road proposals at Benson, Stadhampton and Watlington have arisen in various ways. The pre-submission neighbourhood plans for Benson and Watlington envisage these types of roads, and propose to provide land allocations in the vicinity of them. The Stadhampton proposal has arisen largely as a result of discussions about the effects on the road network of strategic development at Chalgrove Airfield. Further work on the Evaluation of Transport Impacts is required to fully assess these pieces of possible transport infrastructure. Alternatively, it may be that in the course of preparing an application for development at Chalgrove Airfield, that the developers will identify a need for such bypasses as part of their Transport Assessment. We understand that the District has chosen to propose these safeguarded routes at this point of time in order to test the proposals and receive consultation responses. The County Council seeks to be involved in the process going forward as to whether such roads should be safeguarded. If there is evidence to support safeguarding in the Submission Plan, then the County Council considers that the safeguarding needs to be wide enough to enable the new routes to effectively provide for future traffic by diverting the relevant A or B road.

(Para 97) We query whether these three bypasses are of sufficient importance to gain funding sufficient to secure their construction. There are many villages in the

County which would benefit from a bypass, but the criteria for seeking funding from government are strict. The Neighbourhood Plan proposals at Benson and Watlington are for relatively limited amounts of housing which is not anticipated to fully fund a road of the scale required. Whether any requirement can be imposed on the Chalgrove Airfield developers to fund these will depend on whether such a requirement can be evidenced as meeting CIL regulations.

Transport modelling work is ongoing as part of the South Oxfordshire District Council Local Plan ETI mitigation, which will model the impacts of the proposed bypass amongst other mitigation schemes.

At this stage we would note that some statements about the effect of the proposed road within the draft Neighbourhood Plan are likely to be disputed by the County Council should they remain in a Submission document if the safeguarding for a road is being pursued in the Local Plan. For example, we would likely dispute that the proposed road would lead to more traffic within Pyrton Village itself. We would also dispute the statement in paragraph 9.4.8 that 'the proposal does not deliver any benefit with regard to resolving current traffic issues within Watlington town centre'.

Policy SA1 (Site PYR1: Para 7.8.3)

While the draft Watlington Neighbourhood Plan indicates a possible alignment for the suggested edge road that passes through suggested allocated site PYR1, the proposed safeguarding within South Oxfordshire's Local Plan Second Preferred Options avoids this former MOD site and proposes that the edge road joins Pyrton Lane to the west of it.

Although we acknowledge that the MOD site is brownfield land, from a sustainability point of view, it is neither within Pyrton nor Watlington and therefore is not within easy walking distance of services and facilities. Residents may therefore feel isolated from both villages.

Even with the alignment as proposed in the Local Plan Second Preferred Options it is also observed that some land from this site may be required to widen Pyrton Lane and/or improve the junction with the B4009.

Policy SA2: Land between Old Vicarage Cottage and The Lodge House and Policy SA3: Land at New Farm

The quantum of development proposed at each of these sites (2 or less dwellings and 1 dwelling respectively) generates little in the way of transport concerns, save for routine matters that would be dealt with during the planning process.

Policy TTI1: Access and Parking

The stated position with regard to both policies appears reasonable. Any planning application will be commented upon by Oxfordshire County Council as the highway authority and assessed on its merits from the perspective of road safety, parking and other provision. The connection provided from new development at the PYR1 site to the existing highway (to the B4009 and/or Pyrton Lane), will also determine the nature of necessary pedestrian and other highway infrastructure provision.

Policy TTI2: Traffic Levels and Air Quality

The aspiration to minimise traffic impact and mitigate possible speeding and 'rat-running' on Knightsbridge Lane is noted. It is not clear how any works in relation to this aspiration will be funded.

The reference to Watlington's Air Quality Management Area within Policy TTI2 is noted, although given the quantum of development proposed for allocation in Pyrton the resulting traffic impact on the wider network and the AQMA originating from the Pyrton Neighbourhood Plan area is likely to be relatively insignificant.

Policy C3: Developer Contributions

The policy correctly identifies how site-specific planning obligations can be sought and indicates that the share of CIL income received from applicable development will be spent on projects to be agreed by the parish council in consultation with parishioners. Given the limited amount of development, the parish will receive limited CIL receipts, however it may be worthwhile including in the neighbouring plan a more formal list of likely projects than that included in Paragraph 7.4.5.2 (5) which simply records consultation to date.

Education Comments re Watlington Primary School and Icknield School

Primary education

Watlington Primary School is a 1.5 form entry school, admitting up to 45 children per year and with a total capacity of 315 places (excluding the nursery). As of January 2017 the school has 267 children on roll, with spaces in all year groups (although numbers fluctuate and some year groups have only few spare places) i.e. 48 spare places in total. At this moment, it therefore does not have sufficient capacity to meet the expected needs of the proposed scale of development anticipated from the Watlington pre-submission draft Neighbourhood Plan (238 homes) and the 15-20 homes proposed in this pre-submission draft Neighbourhood Plan. However, birth rates have slowed in recent years, resulting in lower primary school intakes. If this trend continues, the school would be able to accommodate the scale of housing growth indicated. Inevitably, there is uncertainty over future birth rates.

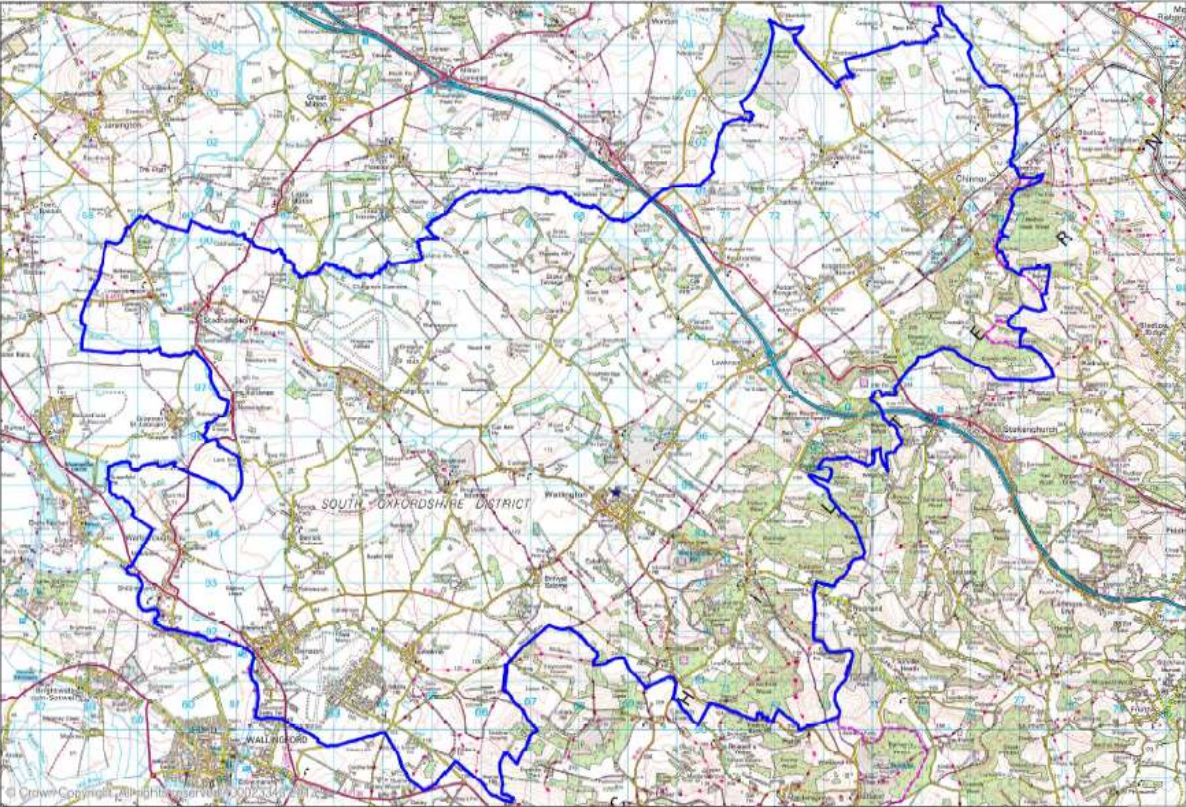
The County Council is seeking, in respect of the Watlington Neighbourhood Plan, that provision to expand the primary school be made. Expansion of the school to 2 forms of entry (60 children per year, total capacity of 420 places) would offer benefits to school financial and organisational management. The school's current site area of approximately 1.8ha is below the county council's standards for a 2 form entry school, but the site adjoins that of Icknield Community College, and also the proposed development referred to in the Watlington draft neighbourhood plan as site C. If additional site area could be transferred to Watlington Primary School, it would therefore be able to expand.

Secondary education

Icknield Community College is a 5 form entry 11-16 school, admitting up to 140 children per year and with a total capacity of 700 places. As of January 2017 the school has 611 children on roll, with spaces in most year groups (although numbers fluctuate and the school admitted over its admission number for 2016, and has allocated more places than its admission number for September 2017 arrivals, indicating growing demand for places at the school).

While it currently, therefore, has 89 spare places, more than the expected pupil generation from the proposed scale of housing growth within the Watlington draft Neighbourhood Plan combined with the Pyrton draft Neighbourhood Plan, this number of spare places is expected to fall over the coming years. Moreover, the school serves a large designated (catchment) area, shown below, and will also be affected by the significant scale of development underway and proposed at neighbouring settlements such as Benson and Chinnor. The school does not have sufficient current capacity to meet the cumulative needs of development within its designated area. It is therefore necessary to ensure the ability of Icknield Community College to expand in future years is protected. The only locations for expansion in situ would be onto Site C in Watlington or site PYR2 in Pyrton.

Location and Designated Area for Icknield Community College in Watlington



The future size of Icknield Community College needs to be considered in the context of the large-scale growth proposed in the recent SODC Local Plan consultation for Chalgrove Airfield, which lies within the school’s designated area. Approximately 3,000 homes are being considered here.

The proposed Chalgrove Airfield development, in isolation, would not make a new secondary school sustainable without threatening the viability of Icknield Community College.

The combined impact of all the currently proposed scale of growth, in addition to the existing population, within Icknield's designated area would be expected to require a secondary school of around 1500 places. The county council's requirement, based on government guidelines, would be a site of 10.6ha for a 1500-place school.

Icknield Community College's current site area is approximately 6.2ha. Based on government guidelines, this is sufficient for 800-1000 pupils, i.e. 200-400 more than the current roll, and could therefore support some expansion of the school. This would not, however, be sufficient to meet the needs of the proposed Chalgrove Airfield as well as the permitted/planned/proposed growth within Icknield's designated area. (It would be expected to be sufficient excluding Chalgrove Airfield.)

If the proposed Chalgrove Airfield allocation is approved, a strategic solution will be necessary to provide secondary education across the area. This will require a larger site area being made available to Icknield Community College. To bring the current site area up to the standard requirement for a 1500 place school would require an additional 4.4ha being added to the current site.

The school's site is bounded by Watlington Primary School, the proposed development site referred to in the Watlington draft Neighbourhood Plan as site C, and PYR2 in the Pyrton draft Neighbourhood Plan. The options for expanding the school in situ would therefore be for land within site C, or within site PYR2, to be transferred to the school. However, it may not be possible to provide sufficient additional land.

The County Council, in its response to the Local Plan Preferred Options has suggested that a possible solution would be for existing Icknield Community College to be relocated to Chalgrove Airfield, if that allocation is confirmed, to enable it to expand. This would bring benefits to the financial sustainability of the school, and enable it to widen its curriculum offer, most notably by extending its age range to include sixth form education, which is not viable at the school's current size. It would also enable complete replacement of the school's accommodation.

To fund the relocation and expansion of Icknield Community College, it would be necessary for the existing Icknield Community College site to be disposed of for development, and the resulting disposal receipt invested in the school's new accommodation. As noted above, some of the site could be transferred to Watlington Primary School, to protect its ability to expand if necessary.

Until the distribution of housing growth is confirmed through the SODC Local Plan process, it cannot be confirmed that the relocation of Icknield Community College would be either necessary or viable. At this stage, it is recommended that the Pyrton neighbourhood plan does not rule out the possibility of expansion onto land within the neighbourhood plan area.

Public Health

The key public health points below should be considered for inclusion in the Neighbourhood Plan (NP) to encourage the development of an environment which:

1. Provides opportunities for people to be more active – active travel should be promoted as the first-choice mode of transport for local journeys within Pyrton and consideration given to how local facilities in neighbouring Watlington can be made more accessible for pedestrians and cyclists. This would widen the scope of the objectives of point 5.6 of the draft NP ‘Ensure suitable, safe access is provided as part of any redevelopment of the site’. Specific references could also be made to make the case for active travel routes to other neighbouring settlements. This addition would also support point 5.4.2. in the draft NP which seeks to maintain the current relatively low traffic levels in Pyrton and also the aspiration to ‘ensure that future development does not adversely impact upon air quality in the local area’ given that part of the neighbouring town of Watlington is designated as an Air Quality Management Area (AQMA). It could also link to and support: 7.3.7.1.; 5.31 and 7.4.5.2. We note that feedback from the community consultation indicated that some residents are ‘opposed to light pollution and therefore to the installation of street lighting’. Lighting can be a contributory feature of increasing the accessibility of cycleways and pathways and so the benefits and appropriateness of its installation should be carefully considered.

2. Provides opportunities to make healthier food choices – although the draft neighbourhood plan does not currently detail any current food/allotment provision in Pyrton (except for reference to agricultural land) this could help to make the case for allotment and/or community food growing provision as part of any new development. This could also be linked to the priorities for potential CIL funding detailed in 7.4.5.2.

3. Fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness – this could support making the case for multi-functional community facilities, in particular with expanding the uses of the current church and village hall buildings where appropriate, and also the green infrastructure and public realm. In addition to helping to maximise potential for physical integration between the existing residents of Pyrton and residents of new dwellings, creating spaces that bring people together can support mental wellbeing/community spirit. Creating an environment that allows people to be more active will also protect and enhance mental health and wellbeing. We would encourage appropriate green space identification to contribute towards this.

4. Enables people to maintain their independence for longer – consideration should be made for making the case for new builds that meet ‘lifetime homes’ standards to potentially enable existing and new residents who would benefit from this type of housing provision to be able to stay in the area for longer. Consideration could also be given to introducing regularly spaced benches within public areas and the replacement of any footpath styles with accessible gates to increase accessibility and encourage use by a broader section of the community.

The above are supported by NPPF paragraphs 7, 35, 50, 69, 156 and the PPG ‘Health and Wellbeing’ chapter.

Environmental Strategy

We welcome the attention given to the landscape and setting of the AONB and the importance of protecting this in future.

Reference could usefully be made to the Oxfordshire Wildlife and Landscape Study <http://owls.oxfordshire.gov.uk>, to provide further guidance on landscape context

Reference could usefully be made to the emerging Green Infrastructure Strategy of South Oxfordshire District Council

It would be helpful to include mention of the Chilterns Escarpment North Conservation Target Area (CTA). CTAs are key areas of opportunity for the enhancement of wildlife, identified at a county scale.

The CPRE has recently published new satellite data on light pollution that may help to inform local planning decisions, including small scale lighting improvement projects <http://nightblight.cpre.org.uk/maps>

As a general principle we would encourage communities to seek a net gain in biodiversity where permission for new development is being sought, to be informed by appropriate ecological surveys.

PYRTON PARISH COUNCIL
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10 February 2018

Ms Lynette Hughes
Senior Planning Officer
Oxfordshire County Council
County Hall
New Road
Oxford
OX1 1ND

E-Delivered: Lynette.Hughes@oxfordshire.gov.uk; planning.policy@southoxon.gov.uk

RE: Reply to Oxford County Council's Response to the Pyrton NP - AMENDED

Dear Ms Hughes,

We apologise for the extended delay in our replying to your helpful letter of 16 June 2017, in which you commented on the draft Pyrton Neighbourhood Plan (PNP). We would like to thank you especially for the care you took with this letter.

We did wait for the issue of the Final Publication Version of the SODC Local Plan before formalising a revised version of the PNP. That also benefits from the various responses we received to the consultation version of the PNP. In delaying, we have therefore followed the advice in the last paragraph of your letter.

Taking your substantive comments in the order in which they appear, first in the letter and then in the attachment:

1. PYR2 and the proposed Watlington bypass: The Final Publication Version of the SODC Local Plan confirms the safeguarding of a route across PYR2 for a mooted Watlington bypass. In view of this, the revised PNP withdraws the proposal that PYR2 be a 'local green space' under NPPF paras 76-77 and designates it a 'local gap'. The parish remains committed to a substantial green buffer on PYR2 that prevents the coalescence of Pyrton and Watlington, and preserves the distinct historic identity of Pyrton.

2. PYR2 and potential expansion of Icknield Community College: We note this possibility and the need for the PNP to cater for it, and have amended the relevant 'local gap' policy to accommodate the possibility of an expansion of Icknield Community College. We presume the founding of new schools in Chalgrove, if that development proceeds, could render any such expansion redundant, a possibility indeed mentioned in your attachment under 'Secondary Education'.

3. PYR2 and planning application P16/S2576/O: The PPC maintains its objections to this application.

4. The Watlington NP: We attach a copy of the PPC's original comments on this and its comments of the latest iteration of the Watlington NP. We note that the SODC prospective safeguarded route does not necessarily impinge directly on PYR1, as your attachment acknowledges.

5. Chalgrove, PYR 2 and the safeguarded route: The PPC remains concerned at the bottleneck that is likely to be presented by Cuxham, should Chalgrove be developed as SODC proposes. On the advice of SODC, the PPC has deleted comments about the resulting traffic impact on the village in the revised PNP. It nonetheless aims to benefit from an independently commissioned traffic survey to help inform its continued engagement on the issue of the mooted Watlington bypass and the Chalgrove development. Under the PNP Action Plan, the PPC will seek ways, in cooperation with OCC, to introduce and fund measures to reduce possible speeding along Knightsbridge Lane, e.g. through improved signage.

6. Policy SA1 and PYR1 sustainability: We recognise the distance of the PYR1 site from Watlington, but some of the planning proposals for residential development on PYR2 envisage houses at almost comparable distance from the centre of Watlington (i.e. a 12-minute walk). There is a planning application in prospect for sheltered housing and a 64-bed care home on this site, which would add considerably to local car use, although there would also be a minibus service for the short distance into Watlington and back.

7. Policy C3 and CIL: The revised PNP includes a list of prospective projects, as you recommend.

8. Public Health: We note your suggestions and have modified existing policies where appropriate by including references in the PNP to active travel, light pollution, biodiversity etc.

We note in the context of active travel that any Watlington bypass that passes across PYR2 would serve to eliminate the current cross-country bicycle and walking route between Pyrton and Watlington along Pyrton Lane and a public footpath that is much used by local residents in both settlements, and which offers uninterrupted views of the Chilterns AONB. The bypass could also increase car usage by Pyrton residents, some of whom can be expected in future to shop further afield in Thame rather than in Watlington, because of the barrier that would be represented by the bypass and its attendant traffic. Any bypass accordingly risks

damaging existing opportunities for active travel by Pyrton residents to their nearest shops, as well as to Christmas Common, another favoured destination for walkers.

We note your point about opportunities for healthier food choices. Most Pyrton residents currently grow vegetables on their own properties, so there are no allotments, as in Watlington. There is, however, a market garden in Pyrton village that sells vegetables and fruits, which we mention in the revised PNP. The amended PYR2 policy specifically welcomes allotments in suggesting that PYR2 should be made available for sports fields, allotments, community amenities and other facilities that do not affect adversely its open, green character.

9. Environmental strategy: We have included in the revised PNP the references you have mentioned, where relevant. We have found these most useful. We have also produced a detailed Landscape and Green Space Appraisal in support of the PNP.

Attachments: **OCC Response to PNP.pdf**
2017-05-16 PPC Response to WNP Consultation 3.pdf
2018-01-27 PPC Response to WNP Submission Version.pdf



Genevieve Young <pyrtonparishcouncil@gmail.com>

RESPONSE to Watlington NP Consultation 3: 18 April - 29 May 2017

1 message

Genevieve Young <pyrtonparishcouncil@gmail.com>

Tue, May 16, 2017 at 9:50 AM

To: Watlington Neighbourhood Plan <info@watlingtonnp.org.uk>

Cc: Ben Schofield <ben@schofield.io>, Henry Findlater <Henry.Findlater@masecopw.com>, Jo Schofield <jo@schofield.net>, John Curtis <John_Curtis@outlook.com>, Joyce Marriott <joycemarriott@btinternet.com>, Lucy Brittain <lucy@brittain.ch>, Michael Crawford <mjcconsult@gmail.com>, Paul McNamara <kpmcnamara@btinternet.com>, Wayne Burt <waynelburt@aol.com>, Luke Vallins <luke.vallins@torltd.co.uk>

PYRTON PARISH COUNCIL RESPONSE TO WATLINGTON NEIGHBOURHOOD PLAN CONSULTATION 3: 18 April - 29 May 2017**Introduction**

1. The following view expressed by the Pyrton Parish Council is based on the consultations with the inhabitants of Pyrton preparatory to the drafting of the Pyrton Neighbourhood Plan (PNP). The draft PNP is currently open for consultation until 16 June 2017 and can be read at the Watlington Library, as well as online at <https://docs.google.com/document/d/1q9g5w7vMYDBCSVAO8zeEKSh42JrNV3jPRj9rn1ULfs/pub>.

2. The draft PNP recognises the important role that Watlington currently plays for Pyrton residents in supplying services and facilities that Pyrton lacks. The draft Watlington Neighbourhood Development Plan (WNDP) underlines the extent to which the town and surrounding settlements, including Pyrton, have been mutually dependent (p. 23). Watlington's future development is a vital interest for Pyrton, and Pyrton residents would like to see Watlington to grow in a manner that enhances its prosperity, while preserving its distinctive character within its natural setting and without harming the identity, integrity and environment of neighbouring settlements.

Re-alignment of the B4009

3. The draft WNDP insists that it "recognises the importance of maintaining the distinct character of both Watlington and its close neighbour Pyrton. Both are historic settlements (with designated Conservation Areas) surrounded by farmland. The separation of the two settlements is essential to maintain their integrity and the green space between them is environmentally sensitive" (p. 25). Indeed, one of the objectives of the draft WNDP is "to protect and enhance the surrounding landscape and the Chilterns Area of Outstanding Natural Beauty (AONB)" (p. 3). Another is to protect and enhance the town's "rural setting surrounded by farmland" (pp. 14, 16). These considerations lay behind the ruling of the Kirkham report against any development on PYR2 "due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape" (p. 42).

4. Notwithstanding the above statements, the draft WNDP proposes to drive a re-alignment of the B4009 through the "environmentally sensitive" PYR2 at a distance from "the existing built form of Watlington in order to create a new edge to the settlement" (p. 24). In practice, although the draft WNDP does not spell this out since PYR 2 lies outside the boundaries of the WNDP area, any re-alignment of the B4009 will be accompanied by extensive housing that will obliterate the green space between Watlington and Pyrton, and cause the coalescence of the two settlements. It will also cause damage to the setting of the Chilterns AONB and of the Shirburn registered park and gardens, as well as to the Pyrton Conservation Area and the grade 2*-listed Pyrton Manor. The recent SODC ruling and refusal of planning to build at East Hagbourne is directly relevant here (P15/S3228/0).

Proposed development of PYR1 and PYR2

5. It is for these reasons that, reflecting the views of the overwhelming majority of Pyrton residents, the draft PNP stands opposed to the development of PYR2 and advocates retaining this as a designated green space. This is to ensure there remains visual and physical separation between Watlington and Pyrton, that both Watlington and Pyrton remain surrounded by farmland, so preserving their rural setting, and that the Chilterns AONB is not damaged by a sizeable development that will gravely affect the view from Watlington Hill. The realignment of the B4009 would cause light, air and noise pollution for Pyrton residents and the concreting over of PYR2 is likely to exacerbate current problems of flooding in the Pyrton Conservation Area, including in listed buildings.

6. The draft PNP endorses and recommends development of housing of appropriate style and density on PYR1, a brownfield site that used to be owned by the MoD. This housing will help to meet area demand, since there is no housing

demand within Pyrton, which, as an 'other village', has no set new housing allocation.

7. The draft WNDP asserts that any development on PYR1 and PYR2 "would relate to Watlington and rely on the services and facilities of the town. Any such development on these two sites should, therefore, count towards any allocated growth for Watlington". As all neighbouring settlements depend to a large extent on Watlington's facilities, this argument involves a non-sequitur. In the Pyrton Parish Council's view, any development on PYR1 (and PYR2) would relate to the parish in which the land is located, viz. Pyrton, since this reflects the fundamental principle underlying the preparation of neighbourhood plans, as endorsed by SODC. The boundary line between Watlington and Pyrton parishes was reviewed and altered at the start of the neighbourhood plan exercise. Pyrton Parish Council would therefore be the appropriate recipient for any associated Community Infrastructure Levy funding.

Traffic and pollution issues

8. Pyrton Parish Council and residents are sympathetic to the concerns of Watlington residents over traffic levels within the town and the resulting pollution that damages the health of residents and those working in Watlington. However, they question whether stricter enforcement of existing traffic restrictions (e.g. the 7t weight limit) or introduction of new ones would not resolve many of the issues experienced by Watlington. The draft WNDP does not present traffic movement data to justify the conclusions reached about the need for the realignment of the B4009 and does not consider alternative solutions that are less intrusive and costly. In some respects the draft WNDP data on local and through traffic does not match that offered by other studies.

9. We await the promised Watlington Traffic Management Strategy. Pyrton will meanwhile conduct its own traffic study, with particular emphasis on the creation of choke points and dangerous intersections, as well as the risk of a rat-run through Pyrton to avoid bottlenecks on the newly aligned B4009.

10. Given the heavy costs of driving a road through PYR2, we consider it vital that research into projected traffic flows be conducted to ensure that a road around Watlington does not generate even more traffic than exists currently, aside even from that linked to associated new housing. It is likely to encourage an even more car-dependent community and lead to congestion that will merely transfer pollution from central Watlington to the north-west periphery. In our view, the construction of a disfiguring and despoiling relief road on PYR2 will create a new problem to replace the existing one.

11. At present the draft WNDP presents air pollution as a major driver for the realignment of the B4009. However, as we understand it, current policy lies in the Air Quality Action Plan (AQAP) 2014, adopted by SODC in 2015, which has identified a resolution for air quality in Watlington. According to this improvements can be made to the route through Watlington by removing parking and increased enforcement of the weight restriction zone (see <http://www.southoxon.gov.uk/news/2016/2016-07/how-will-proposals-reduce-vehicle-emissions-watlington-wallingford-and-henley-affe>). Air pollution is a matter for SODC environmental health and cannot be employed as a policy to drive the case for a relief road that lies at the core of the draft WNDP, in disregard of the AQAP. In practice, the imminent government drive to reduce diesel emissions and the greater efficacy and popularity of electric cars are likely to have reduced the pollution effect substantially by the time any realigned B4009 is completed. They may well render that expensive investment redundant.

12. Meanwhile, the new routing is likely to do substantial damage to the businesses and shops in the centre of Watlington that will be marginalised by the realigned B4009. Such an impact will be in line with the experience of other town centres bypassed. For current Pyrton residents the new road with its congestion and HGVs could become an impediment that will reduce the incentive to use the steadily diminishing shopping amenities in Watlington, as against the more extensive and attractive services available in Thame or elsewhere.

Submitted on behalf of the Pyrton Parish Council

Pyrton Parish Council:

Response to Watlington Neighbourhood Development Plan

Consultation 13 December 2017-28 January 2018

This response is supplementary to that made by Pyrton Parish Council on 16 May 2017 to the draft Watlington Neighbourhood Development Plan (copy of earlier response attached).

The Council notes that no substantial account has been taken of its earlier comments in the Final (Submitted) Version of the plan, which remains unchanged on the key areas of Pyrton's concern.

Pyrton Parish Council questions whether the WNDP can in fact provide the sustainable development that is sought and required.

Re-alignment of the B4009/Development of PYR2

The whole WNDP is predicated on a re-alignment of the B4009, although this requires re-routing in Pyrton parish as well as in Watlington. The WNDP proposes that the new road crosses the environmentally sensitive PYR2 (Map 5: Selected Sites), but also insists that it "recognizes the importance of maintaining the distinct character of both Watlington and its close neighbour Pyrton. Both are historic settlements (with designated Conservation Areas) surrounded by farmland. The separation of the two settlements is essential to maintain their integrity and the green space between them is environmentally sensitive" (p31). Additionally, the plan concurs that "in particular, PYR2 provides clear visual and physical separation between the two communities of Pyrton and Watlington"(p.55).

Any development on PYR2 (which includes running a new road across it) will compromise the separation of the two communities of Pyrton and Watlington, particularly if, as the WNDP proposes, it is "placed further from the existing built form of Watlington in order to create a new edge to the settlement" (p.21). What this means, in effect, is that the boundary between Watlington and Pyrton parishes (which was revised and confirmed as recently as April 2015) will be shunted northwards into Pyrton parish and the gap between the two settlements eroded.

The WNDP is therefore internally inconsistent in that it seeks to adopt two irreconcilable positions, presumably in order to reduce local opposition to the bypass plan.

In its emerging Local Plan (October 2017) SODC also proposes a safeguarded route for a re-aligned B4009/Watlington "bypass or edge road" (p.46-7/p.122). While the exact route differs slightly from that in the WNDP, this also crosses PYR2.

In order to prevent the coalescence of Pyrton and Watlington, the draft Pyrton Neighbourhood Plan (PNP) identifies PYR2 as a local green gap, and seeks to protect the distinctive individual characters and setting of both settlements by maintaining a clear rural buffer between the two.

If the SODC proposal for a safeguarded route is adopted as part of the made Local Plan, and a Watlington bypass is demonstrated to be necessary, feasible, fully funded and supported by the requisite evidence-based traffic assessments, the route should be formulated and adapted to take account of the need to protect the integrity and function of the gap. It should not be linked to, associated with, or accompanied by any housing development on PYR2, and roadside lighting should be kept to a minimum consistent with safety, in order to reduce light pollution impact on Pyrton and Pyrton Manor. This is in conformity with the WNDP's own Basic Conditions statement concerning that issue (p14).

Pyrton Parish Council questions whether the proposed new highway infrastructure is consistent with the WNDP's Basic Conditions statement of providing sustainable development in the town. Far from according with the NPPF policy on ensuring the vitality of town centres, the new routing is likely to do substantial damage to the businesses and shops in the centre of Watlington, in line with the experience of other town centres that have been bypassed. For current Pyrton residents and those in adjacent villages, the new road with its congestion and HGVs will reduce the incentive to use the steadily diminishing amenities in Watlington, as against more extensive and attractive services available in Thame and elsewhere.

Insofar as the WNDP resists the resolution in SODC's Air Quality Action Plan (2014) of reducing on-street parking in the town, Pyrton Parish Council also questions whether the proposed new routing will improve air quality in the town's designated Air Quality Management Area. Standing traffic will remain a problem, and the pollution will merely be transferred from the central Watlington to the north-west periphery. Furthermore, the new road is likely to encourage an even more car-dependent community.

Finally, despite the WNDP's Policy P3 to "conserve and enhance the natural environment" and the assertion that, in accordance with NPPF para 125, proposals for development will be only permitted where, first and foremost: "Views of and from the Chilterns AONB are protected especially from public viewpoints on Watlington Hill National Trust land and the White Mark", the plan proposes to run a new road directly across PYR2, which is clearly visible, indeed central to the view, from that vantage point. (See Paras 1.4.3 and 1.6.14 of the attached Landscape and Visual Assessment of the site - in which it is referred to as WAT8 - prepared in October 2016).

The road will inevitably change and diminish the attractiveness of the landscape, and the proposal therefore is at odds with the emerging SODC Local Plan 2033 to conserve and enhance the Chilterns AONB and to recognise "the intrinsic character and beauty of the countryside". The proposal also threatens lasting damage to the settings of grade 2* Pyrton Manor and Shirburn registered park and garden.

Attachments:

1. Response to Watlington NP Consultation 3: 18 April - 29 May 2017
2. Land Off Pyrton Lane, Watlington (WAT 8), South Oxfordshire: Landscape and Visual Appraisal

Pyrton Neighbourhood Development Plan 2017 – 2033 Consultation Open 5th May – 16th June 2017

Comments on behalf of Providence Land Limited, prepared by Howard Sharp and Partners LLP.

1.0 INTRODUCTION

- 1.1 Providence Land Ltd (PLL) is the promoter of PYR2 (Land to the East of Pyrton Lane) in the draft Pyrton Neighbourhood Plan (PNP) as well as Sites B and C in the draft Watlington Neighbourhood Plan (WNP). These sites are also known as WAT8, WAT9 and WAT10, within the South Oxfordshire SHLAA of 2013.
- 1.2 PLL act for the landowners, who are willing to make site PYR2 available for development, not only to meet housing needs but also essential infrastructure requirements including the Watlington Bypass. PLL already have an outline application for up to 100 homes running on PYR2 (P16/S2576/O) with a reserved corridor for the Watlington Bypass agreed with County Highways. The landowners are also willing to bring Sites B and C forward for development to align with the WNP to facilitate these sections of the Watlington Bypass.
- 1.3 These comments should be read in conjunction with an enclosed Technical Note on Local Green Space Policy prepared by FPCR, which contains the following Figures:
- Figure 1 – Location Plan
- Figure 2 – Landscape Character Plan
- Figure 3 – SODC Safeguarding Map for Watlington Bypass
- Figure 4 – Concept Masterplan by BHP Harwood Ref: 3097.2001 Rev F
- Figure 5 – Green Infrastructure Strategy
- 1.4 In addition, a high level masterplan by BHP Harwood is enclosed for WAT8, WAT9 and WAT10 (Ref 3097.3001 Rev A) to illustrative how the Bypass is able to link all three sites promoted by PLL.

2.0 GENERAL COMMENTS

2.1 There are three key problems with the PNP:

1. **The PNP fails to recognise the need for sites PYR1 (Land at the former MoD site on B4009) and PYR2 to accommodate a bypass/alternative traffic route for the Plan, as identified in the recent SODC Local Plan Second Preferred Options consultation and also in the recent Watlington Neighbourhood Plan consultation.**
2. **The PNP fails to allocate site PYR2 for housing development on the mistaken assumption that it does not relate to the town of Watlington, despite it directly adjoining the Watlington settlement boundary.**
3. **The PNP wrongly seeks to designate PYR2 as a Local Green Space despite it clearly not meeting the national criteria for such a designation.**

2.2 The PNP appears to have been overtaken by events and is now completely at odds with the other draft Development Plan Documents that have been recently issued. With the SODC Local Plan Second Preferred Options consultation proposing to safeguard a route for a Bypass as advised by the County Council and the Homes and Communities Agency (HCA), this now constitutes a vital strategic transport issue that both Watlington and Pyrton Neighbourhood Plans must address. The WNP has already aligned itself with the emerging Local Plan and has taken the opportunity to meet housing needs in a way that also comprehensively tackles transport and air quality issues. One of its key objectives is to safeguard land for a re-aligned B4009 to the north and west of the town in order to reduce the flow of traffic through the town centre and to improve air quality. Only with the provision of this route can there be the necessary restrictions in the town centre to deal with the current severe problems of through-traffic congestion and dangerous levels of air pollution. The WNP's proposed distribution of its preferred housing allocations is divided between three sites along this proposed route which have been chosen on the basis of a systematic analysis of all development options.

2.3 PLL is disappointed that the PNP fails to recognise the particular issues faced by the town of Watlington and is apparently not willing to recognise the problems of traffic congestion and air quality, nor attempt to assist in solving them. Instead, it appears to consider the Parish boundaries as a more important consideration than strategic planning needs when considering questions of sustainable development. There is no evidence of cross-boundary working with Watlington Parish to provide a complementary spatial strategy addressing these matters.

2.4 PYR2 is clearly vital for any alternative traffic route around Watlington; indeed, if such a connection cannot be made through PYR2 then the WNP spatial strategy fails. That is why the WNP also makes reference to PYR2 in terms of completing the alternative route. Section 8.7 (Page 42) recognises the contribution of PYR2 to the re-alignment of the B4009 and that its development would relate to the settlement

of Watlington. An indicative line across PYR2 is shown on Figure 8 (Indicative Route for re-aligned B4009) on page 35. The involvement of the HCA in promoting this route to address the traffic flows from the Chalgrove Airfield development adds further weight to this issue needing to be addressed by the PNP. Without the PNP recognising the need for the Bypass, it is impossible to see how it can proceed. We suggest a policy for sites PYR1 and PYR2 referring to the to the emerging Local Plan and proposed Policy TRANS 3 (Safeguarding of Land for Strategic Transport Schemes), which requires proposals not to harm the delivery of the bypass nor prejudice its construction or effective operation. Without this change, the Plan will not meet the Basic Conditions for Neighbourhood Plans, specifically the requirement to be in general conformity with the strategic policies contained in the development plan for the area of the authority.

- 2.5 In order to make Plan that meets the Basic Conditions we suggest that the PNP should state that PYR2 will be brought forward in accordance with a comprehensive masterplan to ensure the delivery of essential transport infrastructure and appropriate housing development to meet the housing need of Watlington. The WNP proposes a minimum number of 238 new homes to meet the housing needs of the town and the requirements of the emerging South Oxfordshire Local Plan 2033, which does not cap or constrain the amount of housing for the town. The settlement falls within the 'larger village' category of the adopted Core Strategy and emerging Local Plan, therefore 238 dwellings plus approximately 100-120 dwellings in total on PYR1 and PYR2, would be broadly proportionate to the scale and function of the town and position in the settlement hierarchy. The combined sites would result in no more than 400 new dwellings for the town and is of a critical mass that would facilitate the Bypass in its totality. Providing less homes for the town would fail to grasp the opportunity to deliver a comprehensive traffic solution and would merely add dwellings around the town without being able to effectively mitigate their impacts. Nor would the town have the resilience to cope with the through-traffic impact of the Chalgrove Airfield development.
- 2.6 Our supporting information submitted with this representation supplements that submitted for the planning application on PYR2 (P16/S2576/O). It shows how developing between the Bypass corridor and the existing settlement boundary is a sensible approach which makes good use of land. The design work illustrates the development areas and key routes into the sites and how they relate well to the existing settlements and the key facilities, having regard to existing Public Rights of Way. It incorporates an extensive area to extend the secondary school as well as providing a new school drop-off to alleviate congestion on Love Lane.
- 2.7 PLL support the idea of a strong buffer between Pyrton Lane and the town of Watlington, but it must be recognised that PYR1 is an existing brownfield site immediately adjacent to Pyrton Lane which is identified for housing development in the PNP. PLL's proposal for PYR2 would not come any further north than the existing industrial building on PYR1 and to limit its development area to considerably less than half of the PYR2 site area. PYR2 also benefits from an existing strip of third party land which runs along Pyrton Lane (including the Pyrton 'charity lands'), which

- together with a dwelling set in large grounds - already acts as a visual buffer. Moreover, the Masterplan Concept is to create a further buffer in the form of additional structure planting along its edge and several hectares of permanent parkland beyond the proposed Bypass. The reserved corridor for the Bypass is of a generous width, allowing plenty of space for cycle/pedestrian routes and verges running alongside. The masterplan also allows for additional landscaped green space separating the bypass from the housing. At least ten metres separation from the carriageway to the housing is proposed, which allows space for significant landscaping and gentle mounding if the detailed design work supports this. Such mitigation is considered sufficient to justify housing development within the bypass corridor and the updated technical work for the planning application (P16/S2576/O) will show how it ensures any visual, landscape and heritage impacts are minimised.

3.0 SPECIFIC COMMENTS

- 3.1 PLL object to the proposed Policy BNE3: Local green spaces (para 7.3.5.) which identifies PYR2 as a local green space. The justification put forward in the text is primarily concerned with the concerns of Pyrton residents in respect of maintaining the perceived separation of Pyrton and Watlington and preventing their coalescence. The proposed designation is meant to achieve an undeveloped ‘buffer’ between the two settlements, by stopping development on this extensive tract of land. The PNP’s proposed designation of PYR2 as a Local Green Space would not meet the NPPF tests for land that is demonstrably special as demonstrated in the enclosed Technical Note by FPCR. The site is not well related to the Pyrton settlement, it is not of local significance and it is clearly an extensive tract of land rather than having a more local character. The fact that the District and County intend to earmark PYR2 for the route of a Bypass strongly indicates that it should not be ruled out for development. Indeed, the proposed designation conflicts with the District’s emerging strategic transport policy for the site.
- 3.2 PLL object to Policy H1: New homes. It fails to recognise the needs of Watlington, with PYR1 and PYR2 directly adjoining the town and likely to be required for a proposed Bypass across them. PYR2 is suitable for housing development within the line of the Bypass as set out in the previous section. There is no evidence of co-operation with Watlington Parish or South Oxfordshire District on this strategic cross-boundary issue. Without these changes, the Plan will not meet the Basic Conditions for Neighbourhood Plans.
- 3.3 PLL object to the proposed policy D1: Detailed design criteria. It is too prescriptive in respect of design style and building form, without adequate justification.
- 3.4 PLL suggest that Policy SA1 (former MoD site) should refer to the proposed Bypass that needs to run across it as Pyrton Lane will need to be widened southwards to accommodate the Bypass as proposed by the emerging Local Plan.
- 3.5 Appendix G: Review of PYR2 (page 168). PLL wish to point out that the 2015 SODC Landscape Capacity Assessment screened out PRY2 in the first stage of its

assessment, based wrongly on the whole site being developed. There was no subsequent stage 2 assessment of the scheme and, had there been, then a reduced number and scope for landscape and visual mitigation would have been taken into account. Furthermore, now that the District Council is proposing that a bypass runs across PYR2 then this is a fundamental new piece of information that needs to be included within any landscape assessment. This report therefore has limited weight in relation to the current situation.

- 3.6 The Sustainability Appraisal Report is now out-of-date with regard to the proposals for Chalgrove Airfield and the Watlington Bypass in the emerging Local Plan and will need to be substantially re-written. Also the scoring for PYR2 is inaccurate in many respects. It arbitrarily refers (para 9.4) to PYR1 and PYR2 as an 'open gaps' thus resulting in an alleged major negative impact on the countryside. Also the alleged major negative impacts on community involvement are wrongly based on whether the Parish has expressed its opposition to the sites. There is a lack of objectivity in the analysis and we suggest that this work be reviewed by an independent consultant before proceeding with the Plan.

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10 February 2018

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RE: Reply to Providence Land's Response to the Pyrton NP - AMENDED

Dear Sirs,

Thank you for your comments on the draft Pyrton Neighbourhood Plan (PNP), with various attachments.

In response to the latest published version of the SODC Local Plan and comments from other interested parties, Pyrton Parish Council (PPC) has amended the PNP in various respects.

In the first instance, the revised PNP notes the safeguarding of a route across PYR2, although we note that the emerging Local Plan has yet to be examined. The PPC, in commenting on that plan, has queried any mooted bypass in relation to feasibility, sustainability and funding. We attach a copy of those comments. We also note that others have challenged the fundamental validity of SODC safeguarding the route and drawn attention to the inadequate evidence base for the bypass proposal.

Second, as a result of having to take account of the safeguarding, the PNP redesignates PYR2 as an 'open gap', designed to protect the separate identities of Pyrton and Watlington and prevent their coalescence. It also serves to reduce damage to the sensitive setting of the Chilterns AONB, and preserve the settings for Pyrton Manor and the Shirburn registered park and garden. The 'open gap' policy requires that development proposals ensure the retention of the open character of the local gap, with an exception made for any expansion of Icknield Community College. The 'open gap' policy is supported by a detailed Landscape and Green Space Appraisal, which is an accompanying document of the PNP.

The PPC has not altered its view on Providence Land's application P16/S2576/O, to which it remains opposed.

Attachments: **PLL - Providence Land Response to PNP.pdf**
2017-11-30 PPC Response to SODC LP.pdf

Comment Receipt

Event Name	South Oxfordshire Local Plan 2033
Comment by	Pyrton Parish Council (Ms Genevieve Young)
Comment ID	1026
Response Date	30/11/17 16:19
Status	Submitted
Submission Type	Web
Version	0.1

Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy number or the policies map. STRAT9 and TRANS3

Q2 Do you consider the Local Plan is Legally Compliant? No

Q3 Do you consider the Local Plan is Sound? No

Q4 Do you consider the Local Plan complies with the Duty to Cooperate? No

Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

STRAT9 Chalgrove Airfield development is unsound and fails to comply with the Duty to Cooperate for the following reasons:

1) OxLep Strategic Economic Plan: This states that housing and economic growth should be centred around the Oxford Knowledge Spine (Appendix A, fig 1). Chalgrove, however, is located a substantial distance from this area and is not within 'reasonable' daily commuting distance of Oxford City. This site does not, therefore, address the Oxford City unmet need of 3,750 new homes or comply with Oxlep Strategic Economic Plan.

2) Sustainability: The Local Plan does not comply with SODC's own sustainability appraisals which indicate that the Chalgrove Airfield site has very poor sustainability, significantly poorer than other sites closer to Oxford City. These sites have been dismissed on the basis of them being within the Green Belt, yet Green Belt development is planned at Culham, Berinsfield and Wheatley. Furthermore:

a) The Chalgrove development does not meet the key components of SODC's **Transportation Strategy**, namely that '*new development should be located close to, or adjacent to existing and proposed transport infrastructure and public transport that can be augmented to service an increased demand for travel. Development should be designed to promote cycling, walking within and outside the development to workplaces, community facilities and transport hubs*'. Chalgrove would require significantly greater

road infrastructure development than sites closer to Oxford City, at significant cost, and some of which would be on Green Belt land.

b) The increased traffic from Chalgrove, essentially a commuter car based settlement, will create serious carbon emission issues that conflicts with the objective of a 'Low Carbon Oxford' and the aim to reduce carbon emissions by 40% by 2020.

c) Even if new road infrastructure is deliverable and put in place, serious issues in surrounding villages such as Pyrton, Cuxham and Shirburn would occur. Pyrton would, in fact, become a rat run with many commuters from Chalgrove taking a shortcut to the M40 by using Knightsbridge Lane and passing through an SSSI into the village. This minor road is bordered by a strip of woodland supporting one of the largest British populations of the very rare plant species green hound's tongue 'Cynoglossum germanicum'.

d) It would significantly increase the risk of flooding in Chalgrove village, the current plan to mitigate this being impracticable.

e) The Chalgrove development would have a very serious impact on community cohesion.

f) Noise from the runway is likely to be a serious issue to residents on the new development.

g) More houses are allocated via the proposed development at Chalgrove than are required in the Growth Board's own scoping of housing need. The plan can align housing need without inclusion of the undeliverable proposal for a 3,000 house New Town at Chalgrove.

3) Proportionate Evidence: No attention has been paid in the emerging Local Plan to the considerable negative feedback which was given on the Chalgrove proposal during the consultation process.

4) Oxford-Cambridge Expressway: Although this has been mentioned in the plan the potential magnitude of this growth corridor is not indicated. The research on routes for the Expressway and the potential Varsity Rail Link between Oxford and Cambridge could make alternative sites viable for sustainable brownfield development. The fact that this has not been explored in the Local Plan makes it unsound.

5) The plan to develop Chalgrove Airfield fails to satisfy five of the Local Plan's own objectives:

OBJ 1.2: "Support rural communities and "their way of life", recognising that this is what attracts people to the district."

Chalgrove Airfield development would have a disastrous effect on the Chalgrove Village community and the commuter traffic resulting from this development would destroy the rural environment of neighbouring villages.

OBJ 4.2: Make sustainable transport, walking and cycling an attractive and viable choice for people, whilst recognising that car travel and parking provision will continue to be important in the rural District."

This is not the case as, unlike sites closer to Oxford, walking or cycling from the Chalgrove Airfield development to the likely places to work in Oxford City, or the Science Vale would be entirely impractical.

OBJ 5.2: "Support development that respects the scale and character of our towns and villages, enhancing the special character of our historic settlements and the surrounding countryside."

Chalgrove Airfield development would quadruple the size of the Chalgrove community and irreparably damage the character of the area, in particular, the ancient villages and Conservation areas of Cuxham, Pyrton and Shirburn which will become rat runs to the M40.

OBJ 7.2: "Conserve and enhance our rich and varied historic assets and their settings, celebrating these as some of our strongest attributes:"

The Chalgrove Airfield development would irreparably damage the only historical battlefield site within the South Oxfordshire area.

OBJ 8.2: "Minimise carbon emissions and other pollution such as water, air, noise and light, and increase our resilience to the likely impact of climate change, especially flooding:"

The Chalgrove Airfield development would create significantly more carbon emissions than any of the other strategic site options and would exacerbate the already serious flooding issue in Chalgrove village.

TRANS 3 Pyrton Parish Council is aware that the Pyrton Neighbourhood Plan needs to be in line with the emerging Local Plan by acknowledging this safeguarded route, but has the following queries about this proposal....

1. A recently published **CPRE study entitled 'The end of the road? Challenging the road building consensus'** shows that so called relief roads fail to deliver their often-claimed benefits...specifically they

a) induce traffic... generating a lot more traffic than the problem they were intended to solve b) lead to permanent and significant environmental and landscape damage and c) show little evidence of economic benefit to local communities.

2. There appears to be insufficient evidence of the need for a bypass around Watlington and it is not identified in the **Local Transport Plan**.

3. We have not yet seen sufficient research conducted on the effects of this bypass and it appears at odds with the soundness tests in paragraph 182 of the **National Planning Policy Framework**.

4. Funding (estimated between £13,000,000 and £20,000,000) and deliverability of this new road are questionable. A road of this length would have to rely on funding created by unsustainable development resulting in the loss of prime agricultural land (included in **Natural England's 'Chilterns Escarpment North' Conservation Target Area** important for its significant contribution to the following Higher Level Stewardship Objectives: Biodiversity, Historic Environment, Landscape and Access).

5. Other options of a route for a new road around Watlington have not been examined.

6. By taking the safeguarded route to the northwest of Watlington it will cut through Pyrton parish land and a large agricultural field which currently provides a green gap between the two settlements preventing their coalescence. The **Kirkham Report** ruled against any development on the land between Pyrton lane and Watlington Sports field (known as PYR2) *'due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape'* (p. 42).

7. By running the safeguarded route along Pyrton Lane and ending it on the unnamed road into Pyrton from the B4009 it would have a detrimental impact, through light, air and noise pollution, upon Pyrton's conservation area and the historic environment and setting of the Grade II* listed Pyrton Manor and Shirburn Castle. We have doubts about the route ending on a road linking with the Oxfordshire Way (popular with walkers, cyclists and riders) and also adjoining Shirburn Castle's Registered Parkland and a line of ancient and protected Holme Oak Trees.

8. A road to the northwest of Watlington (and resulting development) is likely to exacerbate current problems of flooding within Pyrton village.

Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Local Plan sound, the following modifications are necessary...

1. Remove the proposal to build a Chalgrove New Town

Should this create a deficiency in housing numbers that SODC considers necessary to remedy, replace the Chalgrove Airfield development with a development at one or more of the sites closer to Oxford that were assessed during the Second Preferred Options stage of the Consultation Process (Grenoble Road, Wick Farm, Lower Earfield and Thornhill), based on the significantly superior sustainability of these sites.

These changes would resolve the issue of the poor sustainability of the Chalgrove Airfield development and the issue of the current plan's failure to adequately address the Oxford City unmet need.

2. Remove the safeguarded route to the northwest of Watlington

At present, there is insufficient evidence of the effects and needs for this road. With the projected costs in the region of GBP 20 million it would rely on funding on financial contributions from developers. This

would result in unsustainable development around Watlington (with numbers of houses far greater than the 238 that Watlington has been allocated by SODC).

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

***Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.*

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Additional information regarding traffic management will be available to further support issues raised in this representation.

Would you like to hear from us in the future?

- . I would like to be kept informed about the progress of the Local Plan
- . I would like to be added to the database to receive general planning updates

Planning services

**HEAD OF SERVICE: ADRIAN
DUFFIELD**



Listening Learning Leading

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Chairman of Pyrton Parish Council
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Textphone users add 18001 before you dial

21 July 2017

Dear Cllr. Curtis

South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Abingdon, Oxfordshire
OX14 4SB www.southoxon.gov.uk



Pyrton Neighbourhood Development Plan - Pre-Submission Consultation

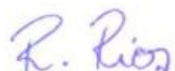
Thank you for your patience whilst waiting for South Oxfordshire District Council's response to your pre-submission consultation. I would also like to thank the members of the steering group for taking the time to meet me on the 11 July 2017, giving me the opportunity to brief them on most of the contents of this response.

Having had an opportunity to see a complete draft of your NDP, along with some of the evidence, I am now able to offer formal advice compiled from across the Council, under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Yours Sincerely



Ricardo Rios

Senior Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment	Recommendation
1	Housing Need Survey	<p>We commend Pyrton for taking a proactive approach and a positive attitude towards housing development. However, because of the less sustainable position of Pyrton in the District settlement hierarchy, it is important that housing need evidence is robust and the approach and choices made in the plan well justified.</p> <p>The plan presents a conflicting message about the findings of the Housing Need Survey (HNS). The more in-depth reflections of the results of the (HNS) indicate that the survey did not identify a <u>need</u>, but instead, it identified <u>local support</u> for the provision of a limited amount of housing.</p> <p>Compounding this conflict, at times, the Plan indicates that site allocations will meet the Parish needs – if this is the case, the plan should be clear about what the identified needs are. Other times, the plan suggests the allocation will meet the future needs – the plan and the HNS are not clear on how the future needs have been calculated.</p> <p>If the intention of the Plan is to identify capacity and contribute towards meeting the overall housing need in the District, the narrative and justifications in the plan should be clarified.</p>	Please review and clarify justifications relating to housing needs and site allocations.

		<p>Finally, the Plan indicates that semi-detached market and affordable houses as the most suitable option. However, it is not clear how this has been assessed and whether it has regard to the latest and up-to-date evidence of housing need set out in the SHMAA 2014.</p>	
2	<p>Basic Conditions Statement Page 125</p>	<p>The Basic Conditions Statement identifies that the site allocations contribute towards delivering a wide choice of homes. However, the Plan suggests a preference for unit sizes similar to existing properties.</p> <p>It is not clear whether the introduction of different types of properties has been considered as a reasonable alternative and/or whether it could have a more positive effect in terms of providing a wide choice of homes.</p>	<p>You should critically evaluate how your proposed allocations will contribute towards delivering a wide choice of homes. If there are constraints that would prevent the delivery or make it inappropriate to deliver different types of houses, this should be explained.</p>
3	<p>PYR1</p>	<p>The Sustainability Appraisal identifies that the site is close to facilities in Watlington but there is no indication that these are accessible.</p> <p>The sustainability of the location and of the proposed development should be a key consideration. You should also consider the potential impact of the loss of employment opportunities on this site.</p>	<p>You should critically evaluate whether/how this proposed allocation could contribute towards the achievement of sustainable development.</p>

		General comment 1 in row 6 is also relevant to this policy.	
4	PYR2	<p>There are several mentions of the opposition of the Parish Council and residents to development in this site. On page 11 it is stated that the Plan opposes any built development in this site. The use of such negative language is inappropriate and may conflict with national policy and guidance.</p> <p>It becomes clear, later in the plan, that a Local Green Space Designation (LGSD) is being pursued. The plan should focus on building a robust evidence base and justification of the exceptional value of the area and how it should be managed thereafter.</p> <p>A LGSD would offer the highest level of protection an NDP could put in place. Further information on LGSD can be found on link, Paragraph 77 on page 18.</p> <p>It is not clear how references in the NDP relating to preventing coalescence between Pyrton and Watlington (page 12) relate to the LGSD criteria in the NPPF.</p> <p>If you feel the sites you have identified do not meet the requirements set by national policy, you</p>	<p>Please ensure the plan uses positive language, focused on building a robust justification for the exceptional value of the area and how it should be managed thereafter.</p>

		<p>might still be able to have a positively worded policy that highlights the special value of identified sites individually and as a network.</p>	
5	General 1	<p>All proposed site allocations for residential development set out a density much lower than the minimum 25 dwellings per hectare required by Policy CSH2 from the adopted Core Strategy.</p> <p>Policy CSH2 aims to promote sustainable development by promoting the efficient use of land and to meet needs for smaller and more affordable homes, particularly where there are good public transport links. The minimum density of 25 dwellings per hectare is designed to give more flexibility in sensitive locations such as village locations. Higher densities can be justified where there is access to frequent public transport services and a wide range of services and facilities, but it should not compromise living standards. New housing should provide good quality, attractive and acceptable living environments. This policy should be read in conjunction with Policy CSQ3 Design.</p> <p>If you consider the minimum density required by Policy CSH2 to be inappropriate, it is important that you develop a robust evidence base justifying how this would have an adverse effect on the character of the area.</p>	<p>Please review site allocations and provide appropriate justification.</p>

6	General 2	<p>A route for the Watlington bypass is proposed to be safeguarded by the emerging South Oxfordshire District Council Local Plan 2033.</p> <p>You can find further details on page 12 of the linked appendix here.</p> <p>In order to ensure conformity with National Planning Practice Guidance, it is important that we produce complementary local plans and neighbourhood plans. Neighbourhood plans should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework).</p> <p>It is important that you consider how the safeguarded route may interact with the proposals in your plans. There may be opportunities for your allocation in PYR1 to contribute towards the delivery of the safeguarded route.</p>	Please ensure there are no conflicts between your neighbourhood plan and the emerging Local Plan for the district.
7	General 3	<p>The Plan often talks about protection and conservation, without much regard for enhancing the area.</p> <p>Neighbourhood plans provide a unique opportunity to set a positive and ambitious framework for the future.</p>	Please review the text in the plan, particularly the sections identified during our meeting, and ensure you use positive language.

8	General 3	<p>The Plan tackles a number of issues that neighbourhood plans have little influence over. These include:</p> <ul style="list-style-type: none"> ● Safeguarding Pyrton from adverse levels of through traffic. ● Lack of restrictions on heavy goods vehicles ● Mobile reception and broadband speeds <p>There are occasions where some of the issues listed above can be positively mitigated by encouraging additional development which may help fund infrastructure or make the provision of services and facilities more viable.</p>	<p>Please review text in the following sections:</p> <ul style="list-style-type: none"> ● Preparation of the Pyrton Neighbourhood Plan – criterion f - page 10 ● Key factors bearing on the PNP – First paragraph – page 11. <p>Please include the caveat we discussed during our meeting clarifying that some issues will be addressed by polices in the plan and others by actions by the Parish Council.</p>
9	General 4	The policies should be clearly distinguishable from supporting text. Page 41	Please amend the format in which the policies are presented so they can be easily distinguished from supporting text.
10	General 5	A number policies use imprecise language i.e. 'parishioners will support'.	Please replace 'Parishioners will support' with 'Planning permission will be granted if'.
11	Policy BNE1 & Supporting text Pages 41 to 43	The Government's Planning Practice Guidance states that "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate	Please review and amend this policy to make it locally specific and to add detail and/or aid the interpretation of local and national policies.

		<p>evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”</p> <p>It is not clear what this policy is adding to existing national and local policies and how it responds to the unique characteristics of Pyrton. Your neighbourhood plan should address gaps or provide further detail rather than duplicating existing policies.</p> <p>It is important to note that the South Oxfordshire Landscape Character Assessment is currently being updated.</p>	
12	Policy BNE2 & Supporting text Page 43	<p>Whilst locally distinctive, it is unclear what this policy is adding to existing national and local policies.</p> <p>The justification to the policy should be based on robust evidence as well as public engagement.</p>	<p>Please review and amend this policy to ensure it adds detail and/or aids the interpretation of local and national policies. Please ensure the supporting text refers to the evidence backing up this policy.</p>
13	Policy BNE3 & Supporting text. Page 43 to 45	<p>Please see comments in rows 4 and 6.</p> <p>Based on feedback from neighbourhood planning examiners, each proposed LGSD should be identified on an individual map of an appropriate scale.</p>	<p>Please see recommendations in row 4 and 6.</p> <p>Please ensure each proposed LGSD is backed by robust evidence.</p>
14	Policy BNE4 & Supporting text	<p>It is not clear what value the first part of this policy is adding to existing national and local policies or</p>	<p>Please review and amend the first part of this policy to ensure it adds</p>

		<p>how it responds to the unique characteristics of Pyrton.</p> <p>The second part of the policy however, is locally distinctive and perhaps necessary as the area is not served by mains waste water.</p>	<p>detail and/or aids the interpretation of local and national policies.</p> <p>Please review/amend the last paragraph of the supporting text to direct developers to relevant experts/service providers.</p>
15	Policy BNE5 & Supporting text Page 47	<p>Policies should target development rather than landowners/developers.</p> <p>Feedback from neighbourhood planning examiners indicate that such policies should be worded “should” rather than “must” to allow a degree of flexibility.</p>	<p>Please amend policy wording to: Landowners and developers should respect and conserve the parish’s footpaths and bridleways, ensuring that development does not significantly harm their ambiance, unless an appropriate alternative can be delivered.</p>
16	Policy C1 & Supporting text Page 48	<p>Consultation requirements are set out in statute and may be beyond the remit of neighbourhood plans. Furthermore, the proposed requirements lack the clarity required by national planning practice guidance in order to conform with basic conditions.</p>	<p>You may have a better chance of success at the examination if the intention expressed Policy C1 is presented as supporting text and in a more positive manner.</p>
17	Policy C2 & Supporting text Page 48	<p>As worded Policy C2 is overly restrictive and has no regard to viability.</p> <p>It is important to note that the Assets of Community Value legislation ensures that community groups have a chance to bid for designated assets. Neighbourhood planning policies can inform how designated assets should be managed by the planning system.</p>	<p>Please review policy wording to: Development proposals that will result in either the loss of or significant harm to a designated Asset of Community Value will be resisted, unless it can be clearly demonstrated that the operation of the asset, or the ongoing delivery of the community value of the</p>

			<p>asset, is no longer financially viable.</p> <p>You may also add a policy similar to the one below: Improvements to Community Assets Proposals to improve the viability of a designated Asset of Community Value, or of any other established community use by way of the extension or partial redevelopment of buildings and land will be supported, provided the design of the scheme and the resulting increase in use are appropriate in design terms and will not harm the amenities of adjoining residential properties.</p>
18	Policy TT11 & Supporting text Page 50	It is not clear what this policy is adding to existing national and local policies and how it responds to the unique characteristics of Pyrton. Your neighbourhood plan should address gaps or provide further detail rather than duplicating existing policies.	Please review and amend this policy to make it locally specific and to add detail and/or aid the interpretation of local and national policies.
19	Policy TT12 & Supporting text Page 51	The issues dealt with in this policy are largely outside the remit of neighbourhood plans. Examiners normally recommend such policies to be turned into actions that the Parish Council can follow up with the relevant authorities.	Please consider turning this policy into an action (chapter 8 off your neighbourhood plan) and follow it up with the Local Highways Authority (Oxfordshire County Council).

20	7.6.1 Summary Page 51	<p>This section refers to 'local demand' however it is not clear whether this relates to the neighbourhood area or the wider district.</p> <p>Please see comment in row 1 in relation to the housing need survey.</p> <p>It is also not clear whether the suggestion that 'no more than three dwellings will be located in the core village' is backed by local consultation or the result of your consideration of reasonable alternatives.</p> <p>Overall, this summary appears overly negative and inconsistent with positive stance of your neighbourhood plan towards housing development.</p>	<p>Please see recommendation in row 1.</p> <p>Please review and amend this section to bring it in line with your neighbourhood plan's positive stance towards housing development. You may achieve this by using wording such as: <i>"We have identified opportunity to accommodate three new dwellings in the core of the village"</i>.</p>
21	7.6.3.2 Supporting text Page 52	<p>Neighbourhood planning policies should be supported by robust evidence. The supporting text refers to an anecdotal understanding of the potential housing need for the parish.</p>	<p>Please review this section and amend the text to refer to the latest and up-to-date evidence of housing need supporting the emerging Local Plan.</p>
22	Policy H2 & Supporting text. Page 53	<p>This policy states that new residential development should predominantly comprise detached or semi-detached houses.</p> <p>It is not clear how this requirement relates to an identified need, i.e. SHMAA or the Pyrton Housing Need Survey.</p>	<p>Please ensure this policy is justified by robust and up-to-date evidence.</p>

		<p>In addition, please see comments in row 2 and 6, relating potential issues of conformity with the NPPF's intent to deliver a wide choice of homes and potential issues of conformity with Policy CSH2 of the Core Strategy.</p>	
23	<p>Policy D1 & Supporting text Page 53</p>	<p>Please see comment in row 10.</p> <p>Neighbourhood plans should be read as a whole therefore the use of 'subject to compliance with all other PNP policies, and the identified site allocations' is unnecessary. Criterion a is overly restrictive and not backed by robust evidence.</p> <p>In relation to criteria b and c, terms such as 'character' and 'traditional architectural style' are frequently used to describe the distinctive look and feel of an area which needs to be protected but it does little in itself to explain what this is.</p> <p>Criterion d requires the provision of generous plot and garden sizes. This requirement may conflict with Policy CSH2 of the Core Strategy.</p> <p>Criterion e requires the provision of off street parking and garages. It is not clear whether both are expected to be provided in all circumstances. If so, this requirement could be deemed unduly onerous.</p>	<p>Please see recommendation in row 10.</p> <p>Please delete "subject to compliance with all other PNP policies, and the identified site allocations:' from the end of part 2 of the policy.</p> <p>Please delete criterion a.</p> <p>Please identify supporting evidence (such as a local character study) which explains the elements that add up to define local 'character' and 'traditional architectural style' or describe it more fully in your policy text.</p> <p>Please consider the conformity of criterion d with Policy CSH2 of the Core Strategy and provide an appropriate justification.</p>

		Paragraph 2 of the supporting text (7.7.3.2) states that ' <i>any new residential development <u>must</u>, in general, accord...</i> ' The use of 'must' is only appropriate where you are sure that the requirements of the policy are compulsory in all circumstances.	Please review and clarify criterion e . Please replace 'must' with 'should' in paragraph 2 of the supporting text 7.7.3.2.
24	Policy D2 and D3 Page 54	Please see comment in row 10. Neighbourhood plans should be read as a whole therefore the use of 'subject to compliance with all other PNP policies, and the identified site allocations' is unnecessary. Criteria a from policy D2 and b from Policy D3 appear to take a less robust approach than the saved policies in the Local Plan (2011) in relation to protecting residential amenity.	Please see recommendation in row 10. Please delete "subject to compliance with all other PNP policies, and the identified site allocations". Please review this policy and consider adopting wording similar to Policy D4 of the adopted Local Plan 2011.
25	Policy SA1 and Supporting text	Please see comments in rows 1, 2, 3, 5 and 6. In addition, your site allocation should resolve the issue of whether the economic use of the site is viable and whether the loss of employment opportunity is appropriate.	Please see recommendations in rows 1, 2, 3, 5 and 6. Please review and provide justification of whether the proposed use of the site is viable and appropriate.
26	Policy SA2 & Supporting text	Please see comments in rows 4 and 6. Criteria a and b refers to 'The owner or developer', to ensure the policy has the clarity required by national planning practice guidance, it	Please see recommendations in rows 4 and 6. Please amend the wording in criteria a and b to target

		<p>would be more appropriate for the policy to target development rather than the owner or developer.</p> <p>With regards to criterion b, you can encourage developers to engage with the Parish Council but it may be unreasonable to make it a policy requirement.</p> <p>Criterion c is unnecessary, as neighbourhood plans should be read as a whole.</p>	<p>development rather than the site owner or developer.</p> <p>Please amend criterion b to positively encourage developers to engage with the Parish Council.</p> <p>Please delete criterion c.</p>
27	Policy SA3 & supporting text	<p>Please see comments in rows 1, 2 and 5.</p> <p>Criterion a refers to ‘The owner or developer’, to ensure the policy has the clarity required by national planning practice guidance, it would be more appropriate for the policy to target development rather than the owner or developer.</p> <p>With regards to criterion b, you can encourage developers to engage with the Parish Council but it may be unreasonable to make it a policy requirement.</p> <p>Criterion c is unnecessary, as neighbourhood plans should be read as a whole.</p>	<p>Please see recommendations in rows 1, 2 and 5.</p> <p>Please amend the wording in criterion a to target the development rather than the site owner or developer.</p> <p>Please amend criterion b to positively encourage developers to engage with the Parish Council.</p> <p>Please delete criterion c.</p>
28	Comments from SODC CIL Officer	<p>It would be helpful to have a section on infrastructure projects within the NP.</p> <p>For example, (i) which infrastructure projects are considered essential (ii) a list of local</p>	<p>For further information on CIL matters please contact: Heike Wetzstein Heike.Wetzstein@southandvale.gov.uk</p>

		<p>infrastructure projects the parish would like to spend CIL money on.</p> <p>Things you might want to consider:</p> <ul style="list-style-type: none"> ● A list of projects or priorities for our parish? ● Are the projects costed? Could they actually be delivered? ● How will we decide what to spend CIL on? ● How will we engage with the community on how to spend CIL? ● Do we have effective administrative processes in place that will allow the district council to pass on CIL funds? ● Do we have effective reporting mechanisms to show how we have spent CIL? <p><u>Re the MOD site.</u> When a site is redeveloped the floorspace of the existing building can be considered for the purpose of calculating CIL (i.e. when the building has been in use for the last 3 year the floorspace can be deducted from the proposed floorspace).</p>	
29	8.3 Actions	This section is unlikely to be subject to examination. However, the examiner may recommend that certain policies, which do not	

add local detail or do not relate to land use matters, should be moved to this section.

8.3.1 Work with developers

It may be useful to create a protocol which could be included as an appendix. Please see examples [here](#).

8.3.2 Nominate assets of community value

By the time your plan is made, applications for the designation of Assets of Community Value would have been determined. It is important to bear in mind that such designations lapse after 5 years. Therefore, it may be worth revising this section to state that the Parish Council will identify, nominate and re-nominate Assets of Community Value if appropriate.

8.3.4 Monitor housing needs

It is not clear how this will be achieved. For example, is it going to be through a survey? How often would the survey be carried out, i.e. every five years? - Please clarify.

8.3.5 Monitor the PNP

It is not clear how the plan will be monitored, when it will be monitored and how the findings will be reported back to the community – please clarify.

8.3.6 Keep the PNP up to date

		<p>To keep the plan up to date it is important to monitor it and review when necessary. I would suggest replacing the suggestion that the plan will be reviewed in five years and every five years thereafter with an explanation that the plan will be monitored early (for example) and reviewed when necessary.</p>	

PYRTON PARISH COUNCIL
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12 February 2018

Ricardo Rios
Senior Planning Policy Officer (Neighbourhood)
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Abingdon
OX14 4SB

Dear Ricardo,

Thank you for your most helpful letter of 21 July 2017. Taking your constructive suggestions, we have now completed our amendments to the draft Pyrton Neighbourhood Plan (PNP), which we are sending you separately.

The PNP, with its two short appendices (key terms and list of policies), is accompanied by the following free-standing supporting documents in pdf, which we have also sent you separately, with the following titles:

- Pyrton Neighbourhood Plan - Final Submission
- Pyrton NP - Appendix A - Glossary of key terms
- Pyrton NP - Appendix B - List of PNP policies
- Pyrton NP - Consultation Statement
- Pyrton NP - Consultation Statement Appendices A-P
- Pyrton NP - Basic Conditions Statement
- Pyrton NP - Sustainability Appraisal Report
- Pyrton NP - Potential Local Housing Needs Report
- Pyrton NP - Potential Development Sites
- Pyrton NP - Review of potential development sites
- Pyrton NP - Conservation Area Character Appraisal 20180210 (Draft)
- Pyrton NP - Landscape and Green Space Study
- Pyrton NP - Pre-Application Community Involvement Protocol for Pyrton Parish - Guidance Notes

Please could you acknowledge receipt of each of these so that we can be sure they are all lodged with you?

You will see that we have made a series of adjustments to take account of your comments and of developments since July 2017. The latter include the Final Publication Version of the SODC Local Plan 2033 and SODC's grant of planning consent for residential development at both New Farm and on the land between Old Vicarage Cottage and The Lodge House. As you know, the original draft PNP had site allocation policies covering those sites. We have now deleted those, since they have been overtaken. We also now have a planning application for a care home on PYR1.

Rather than go through your comments individually, I highlight below some of the key changes we have made in response to your valuable guidance and suggestions:

- a. We have clarified that the PNP is responding to wider district housing needs, not to identified or future parish housing needs;
- b. We have developed a 'local gap' policy to cover PYR2;
- c. We have offered more evidence in support of our 'local green space' designations and policy;
- d. We have prepared a detailed Landscape and Green Space Appraisal to support the landscape policy and other policies;
- e. We have deleted traffic policies and included traffic-related tasks in the parish council action plan;
- f. The parish council adopted a Pre-Application Involvement Protocol on 19 December 2017;
- g. We have produced a revised policy covering CIL;
- h. Finally, we have sought to adopt a more positive narrative, and to tighten up the language, justifications and evidence base in relation to individual policies.

We look forward to having your response and receiving confirmation that this is a valid submission of the PNP in terms of meeting the legal requirements.



Sent by email: pyrtonparishcouncil@gmail.com

 thameswaterplanningpolicy@savills.com

 0118 9520 503

16 June 2017

South Oxfordshire – Pryton Neighbourhood Plan

Dear Chris,

Thames Water are the statutory water and sewerage undertaker for the South Oxfordshire District and the following comments are made in this respect.

General Comments

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:

“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”

Paragraph 162 of the NPPF relates to infrastructure and states:

“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”

The new web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that:

“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

Policy BNE4 Flood Risk and Drainage

Thames Water would like to support Policy BNE4 on Flood Risk and Drainage and its supporting text in paragraph 7.3.6.2.

Site Specific Comments

Waste Water

Site SA1: Former MoD site

The former MoD site is likely to cause capacity concerns. As such discussions with the developer will be required in order to determine the ability of the existing network to accommodate the proposed development.

Site SA2: Land between Old Vicarage Cottage and The Lodge House and SA3: Land at New Farm

Although both these sites are small in size, they are not located within the vicinity of a public sewer. Therefore again discussions with the developer will be required to determine how foul water will be disposed of from the site.

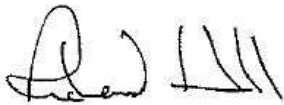
On all sites, surface water will be required to be disposed of inline with the sequential approach to the disposal of surface water i.e. the SuDs Hierarchy

Clean Water Supply

Based on the information provided, we have no concerns.

We hope this is of assistance. If you have any questions please do not hesitate to contact Carmelle Bell on the above number.

Yours sincerely



Richard Hill
Head of Property

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15 January 2018

Richard Hill
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E-Delivered: thameswaterplanningpolicy@savills.com

RE: Reply to Thames Water response to the Pyrton NP

Dear Mr Hill,

Thank you for your letter dated 16 June 2017 regarding the Neighbourhood Plan for Pyrton.

We appreciate your consideration on water and sewage in relation to our plan, although you had no detailed comments to make in this instance.

Thank you for the guidance included in your letter for Waste Water and Clean Water Supply with regard to the specific sites for development included in the neighbourhood plan: the former MoD site, New Farm land and the land between Old Vicarage Cottage and The Lodge House.

Attachment: **Thames Water Response to PNP.pdf**

Watlington Parish Council Response to the Pyrton NDP

NB: these notes are supported by the WNDP Forum. The WNDP has undergone Consultation 3 which has demonstrated solid support from the Community.

Notes on the consultation on the Pyrton NDP:

1: General comments:

- a) The key aim of the Plan to protect the character and setting of Pyrton village is supported.
- b) The aim to maintain visual separation between the settlements of Pyrton and Watlington is also supported in order to maintain the integrity of both settlements.
- c) The mismatch between the Pyrton and Watlington NDPs is noted regarding the safeguarding of land across sites PYR1 and PYR2 for a re-aligned B4009.

2: Specific comments:

- a) **Potential flood risk:** it is noted that flood zones are not designated on any part of PYR2 (Figure 14). The risk of flooding from this site would have to be taken into account and alleviated as a result of a re-aligned B4009 or any other development on the site.
- b) **Policy BNE 3 (7.3.5): Local Green Spaces 1a, 1b and 2:** Watlington is broadly in favour of the designation of PYR2 as Green Space as this is consistent with the views of the planning committee who recently joined Pyrton PC in their rejection of the Providence Land application for this site, as well as the Neighbourhood Plan who have also designated the adjacent Sports Field as being Green Space. We would however highlight the need for a re-routed B4009 in order for any viable NP strategy to be accepted by both the residents and the plan inspectors and support SODC's safeguarding decision in this respect. An amicable compromise is achievable under the terms of Paragraph 90 of the NPPF guidelines for Green Spaces and Green Belt land that implies a rural road equivalent in scope to the existing B4009 would be acceptable in the absence of any other development on that site. We hope that Pyrton will join us in seeing the benefits of such a compromise in that it increases the opportunities for increased safety, sport and leisure for both settlements as well as moving the increased traffic flow predicted for 2032 further away from Pyrton's more historic buildings.
NPPF Paragraph 90 would apply – 'Certain other forms of development are also not inappropriate in Green belt.....' these include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location').
- c) **Policy C3 (7.4.5.1) 5h and 5k:** proposals to provide a green footpath into Watlington and to provide safer walking/cycling routes connecting Pyrton and Watlington are supported.
- d) **Policy C3 supporting text (7.5.4.2):** statements about the need to avoid air pollution and light pollution are supported.
- e) **Policy SA1 (7.8.3.1) relating to site PYR1:**
 - (i) In view of the proposed growth of Watlington over the period to 2033, the loss of local employment opportunities would be detrimental to sustainable development. Therefore, the proposal that 'it should be established first that there is no viable opportunity to redevelop the site for employment purposes' is supported.

- (ii) The possible use of the site for a care home and associated 'close care' or 'extra care' provision should be included as one option.
- (iii) It is noted that there is no provision within the site for a safeguarded route for a re-aligned B4009. This conflicts with the Watlington NDP. Such a route could be beneficial to Pyrton with all the developments occurring in Watlington, Benson, Chinnor and Chalgrove not to mention if the 3000 homes and associated other buildings goes ahead in Chalgrove, Pyrton could be vulnerable to becoming more of a 'rat run' and it should take all the traffic that now uses Pyrton Lane as a by-pass further away.
- (iv) **Consultation Statement:** it is noted that there is no mention of the meetings with the Watlington NDP Forum. There is also no reference to the meetings attended by both the Pyrton and Watlington NDP teams with SODC and the HCA to resolve the conflicting aims of the two NDPs on the following dates:
 - i. 20.04.16, 15.09.16, 21.03.17 - meetings held with Pyrton in Watlington at our invitation.
 - ii. 11.01.17 - meeting at SODC with Peter Canavan and representatives of the Watlington and Pyrton NDP teams to discuss 'how best to ensure that the Watlington and Pyrton NDPs fit well together'.
 - iii. 04.10.16 - Meeting arranged with the HCA by WNDP - Pyrton and other villages invited to attend.
 - iv. 27.10.16 - meeting arranged by WNDP for local villages in advance of the HCA Strategic Infrastructure Corridor Workshop - Pyrton attended
 - v. 31.10.16 - HCA Workshop at Lambert Hotel as above
 - vi. 13.12.16 - meeting with HCA arranged by WNDP - local villages invited - Pyrton attended. Afternoon session looked at the possible 'edge' street for Watlington. Following a detailed discussion 'The principle of an edge road (within WAT 8) was, however, broadly accepted'.

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11 December 2017

WATLINGTON PARISH COUNCIL

E-Delivered: wpc@watlington-oxon-pc.gov.uk

RE: Reply to the Watlington Parish Council's Response to the Pyrtton NDP

General comments:

We welcome your support for our Plan's key aim to protect the character and setting of Pyrtton Village and to maintain both the visual and physical separation of the two settlements of Pyrtton and Watlington.

We recognise that for the PNP to be in conformity with the SODC Local Plan, we must accept a safeguarded route somewhere on PYR2 but have the following queries about this proposal:

1. A recently published CPRE study entitled '***The end of the road? Challenging the road building consensus***' shows that so called relief roads fail to deliver their often-claimed benefits...specifically they

- a) induce traffic... generating a lot more traffic than the problem they were intended to solve,
- b) lead to permanent and significant environmental and landscape damage, and
- c) show little evidence of economic benefit to local communities.

2. There appears to be insufficient evidence of the need for a bypass around Watlington and it is not identified in the Local Transport Plan.

3. We have not yet seen sufficient research conducted on the effects of this bypass and it appears at odds with the soundness tests in paragraph 182 of the National Planning Policy Framework.

4. Funding (estimated between £13,000,000 and £20,000,000) and deliverability of this new road are questionable. A road of this length would have to rely on funding created by unsustainable development resulting in the loss of prime agricultural land (included in Natural England's 'Chilterns Escarpment North' Conservation Target Area important for its significant contribution to the following Higher Level Stewardship Objectives: Biodiversity, Historic Environment, Landscape and Access).

5. Other options of a route for a new road around Watlington have not been examined.

6. By taking the safeguarded route to the northwest of Watlington it will cut through Pyrton parish land and a large agricultural field which currently provides a green gap between the two settlements preventing their coalescence.

The **Kirkham Report** ruled against any development on the land between Pyrton Lane and Watlington Sports field (known as PYR2) '*due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape*' (p. 42).

7. By running the safeguarded route along Pyrton Lane and ending it on the unnamed road into Pyrton from the B4009 it would have a detrimental impact, through light, air and noise pollution, upon Pyrton's conservation area and the historic environment and setting of the Grade II* listed Pyrton Manor and Shirburn Castle. We have doubts about the route ending on a road linking with the Oxfordshire Way (popular with walkers, cyclists and riders) and also adjoining Shirburn Castle's Registered Parkland and a line of ancient and protected Holme Oak Trees.

Specific Comments

Potential Flood Risk: We agree that any future development on PYR2 will have to include suitable alleviation measures into any planning application.

Policy BNE 3 (7.3.5): Local Green Spaces 1a, 1b and 2: Pyrton welcomes Watlington's agreement that PYR2 should be designated as a Green Gap in line with NPPF guidelines. Pyrton will include a safeguarded route across PYR2 to ensure conformity with the SODC Local Plan, but believe that the case for a re-routed B4009 is non-proven as outlined in our seven (7) queries detailed under General Comments.

Policy C3 (7.4.5.1) 5h and 5k and Policy C3 supporting text (7.5.4.2): Pyrton welcomes Watlington's support.

Policy SA1(7.8.3.1) relating to site PYR1:

(i) & (ii) Pyrton awaits the planning Application from Victoria Land/Hunter Page, expected before the end of 2017 and agrees that local employment is an essential element for sustainable development.

(iii) Pyrton notes that at the 28th November 2017 meeting, the spokesperson for Hunter Page stated that land could be made available for a safeguarded route, for a "*suitable commercial consideration*".

Consultation Statement:

Pyrton thanks Watlington for detailing these meetings (i) to (vi) and asks that Watlington send the dates and minutes of any other meeting held with HCA, SODC, Victoria Land/Hunter Page and Providence Land when PYR1 and PYR2 were discussed.

Attachment: **WPC Response to PDNP.pdf**