



**CROWMARSH PARISH
NEIGHBOURHOOD PLAN**

2020-2035

Appendix 7

CONSULTATION STATEMENT

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Consultation Statement
Crowmarsh Parish Neighbourhood Plan
2020-2035

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Crowmarsh Parish Council

January 2021

1. Introduction

This Consultation Statement has been prepared in order to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 Section 15(2). Part 5 of the regulations sets out what a Consultation Statement should contain:

1. Details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan;
2. An explanation of how they were consulted;
3. Summarises the main issues and concerns raised by the persons consulted; and
4. Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

The aims of the Crowmarsh Parish Neighbourhood Plan consultation process were:

- To involve as many of the community as possible throughout all consultation stages of Plan development in order that the Plan was informed by the views of local people and other stakeholders from the start of the Neighbourhood Planning process;
- To ensure that consultation events took place at critical points in the process where decisions needed to be taken;
- To engage with as wide a range of people as possible, using a variety of approaches and communication and consultation techniques; and
- To ensure that results of consultation were fed back to local people and available to read (in both hard copy and via the Crowmarsh Parish Council website) as soon as possible after the consultation event.

Crowmarsh Parish Council elected to produce a Parish Neighbourhood Plan in April 2017. This decision was driven by three major planning applications submitted for the village of Crowmarsh Gifford and a further major housing proposal within the Parish. The Council considered that the community should have a say in allocating land for both housing and employment use and that housing development should not be driven by speculative housing development proposals outwith the Emerging Local Plan for the District.

The Plan Steering Group, comprising both members of the Parish Council and residents from the Parish, has met at regular intervals to guide the process of developing the plan. Minutes of the Steering Group meetings have been recorded and retained as hard copy for inspection.

Regular meetings have been held between the Steering Group members and the respective Case Officers at the Local Authority Planning Department. The plan process has been undertaken around an ongoing dialogue with the project case officers, Ricardo Rios, Cheryl Soppet, Rhona Knott and Dorottya Faludi, at the Planning Department, South Oxfordshire District Council. A valuable dialogue has been maintained which has ensured compatibility with the Emerging Local Plan 2034 and provided guidance throughout the Plan process. O'Neill Homer, Planning Consultants, Wandsworth, were engaged to advise on the preparation of the Development Plan and their involvement through Leani Haim, Principle Planner, has been invaluable throughout the process.

2. Statutory Consultation

Note that at this stage it was planned to allocate land for housing development, this was dropped at a later stage and only land for employment use was allocated in the submission plan.

Who: Environment Agency, Historic England and Natural England

How: Email exchange between District Council Case Office and consultees

Issues raised: proximity of - flood zones 2 and 3, historic environment and AONB, and designated sites and protected landscapes - to prospective allocation sites.

How issues addressed: The assessment of allocation sites focussed on the issues raised which were included in the SEA Framework in order to test the site allocation process

An Initial Screening Opinion on the determination of the need for a Strategic Environmental Assessment (SEA) was issued on 9 January 2018. South Oxfordshire District Council determined that the Crowmarsh Parish Neighbourhood Development Plan did not require a SEA. However, the three statutory consultees determined that a SEA was required:

- In an email dated 20 February 2018 Environment Agency stated the need for a SEA because the Crowmarsh Parish Neighbourhood Plan Area includes large areas of Flood Zone 2/3 and has a large portion of the River Thames which forms the western boundary.
- In an email dated 26 February 2018 Historic England stated the need for a SEA because the Plan could have significant effects on the historic environment in addition to the likely effect on the Chilterns AONB.
- In an email dated 1 March 2018 Natural England stated the need for a SEA because there are designated sites or protected landscapes within the impact zones of the Neighbourhood Plan area.

The Chilterns Conservation Board was asked whether it required a SEA to be undertaken regarding the Chilterns Area of Outstanding Beauty which much of Crowmarsh Parish is contained within. The Board responded that it would like to be kept informed of progress and were shown the SEA in October 2018. The Board provided valuable wording for incorporation in the SEA and the Plan regarding development within the AONB.

The response from Natural England specifically noted the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act, 2006, and section 109 of the National Planning Policy Framework). Natural England requested that any development policy include wording to ensure 'all development results in a biodiversity net gain for the parish'. The evaluation of Flood Zones 2 and 3 has also included groundwater flooding which is prevalent in the lower elevation parts of the Parish.

The issues addressed by the Consultees formed the foundation for the Site Assessment Framework laid out in the Scoping Report to ensure that the three major concerns were incorporated in the assessment procedure. Any site considered for allocation for housing and employment use was considered to be 'unsuitable' for development if it lay within Flood Zones 2 or 3, impacted the historic environment in any way or impacted designated sites and protected landscapes.

The Draft Scoping Report was published on the Parish Web Site and sent to the Consultees on 21 June 2018 advising of a consultation period closing on 23 August 2018. The Consultation comprised:

Who: Environment Agency, Historic England, Natural England, Chilterns Conservation Board, Community and stakeholders

How: Email exchange between LNP Steering Group and consultees and publication of relevant documents on the Parish Council web site and described in Crowmarsh News (delivered to every household in the Parish) within the consultation period 21 June to 23 August 2018

Issues raised and How issues addressed see Table 1 in Section 1 of the SEA document.

The completed Scoping Report and SEA were returned to the consultees in October 2018 and received positive comments.

3. Non-statutory consultees

Who: Chilterns Conservation Board, Directors of Howbery Park, School Governors, Wallingford Town Plan Steering Group and two Planning Enquiries

How: Email exchanges, personal contact, use of emerging Plan at two Planning Enquiries in the Parish

Issues raised: respectively, conservation of Chilterns AONB, appropriate allocation of land for employment use, school places and increased demand, cohesion between Wallingford and Crowmarsh plans, consistency of reasoning and assessment

How issues addressed: respectively, conservation of AONB incorporated in assessment procedure and SEA framework in order to test them, ensure that employment use allocation was in line with the existing plans for Howbery Park, highlight in Plan that school places will be at a premium for families within the Parish, ensure that the Crowmarsh Plan did not conflict with the emerging Wallingford Town Plan, and ensure that assessments for land allocation were consistent

Dialogue has been maintained with Directors of Howbery Park regarding the allocation of land for employment use in the Parish. A copy of the draft Presubmission Plan was issued on 7 June 2019 for subsequent discussion and amendment and of the submission Plan in November 2020, there having been no response to the Reg 14 Consultation invitation.

Consultation with the School Board of Governors and the Head Teacher ensures that concerns over new housing development and increased demand for places at the school can be highlighted; there is no welcome amelioration likely other than bussing children to other nearby schools.

Dialogue has been maintained with Wallingford Town Plan Steering Group to ensure compatibility between their emerging plan and Crowmarsh Parish Plan. This has provided useful exchange of ideas and compatibility between the two draft plans.

The emerging Plan was issued to the Planning Inspectors at both the CABI Planning Enquiry and that for Land East of Benson Lane, although at that time they carried little weight. At the Benson Lane Enquiry the Barrister for Bloor Homes, the Appellant, provided valuable feedback regarding consistency of reasoning behind the assessments for land allocation inside and outside the AONB. These inconsistencies have now been corrected.

4. Community consultation

Who: Residents of and main employers within Crowmarsh Parish

How: Personal contact, meetings, dissemination of progress and ongoing dialogue with stakeholders

Issues raised: Key issue is supporting infrastructure keeping pace with proposed development

How issues addressed: key issue highlighted in Plan

Dissemination of reports has been via the Parish Council web site, where all reports are available to download as pdf files and in hard copy lodged at the school, village hall and pavilion.

Publication on the web site occurred as follows:

09 July 2017: *Plan Appendix 1, Baseline Report*, 30 April 2018 revised

31 August 2017: *Plan Appendix 2, Environment and Heritage Evidence Report*, 30 April 2018 revised

4 November 2017: *Plan Appendix 3, LNP Survey, September 2017 Report*

18 January 2018: *Plan Appendix 4, Housing Needs Assessment Report*, 30 April 2018 revised

25 January 2018: *Plan Appendix 5, Landscape Survey Impact Assessment Report*, 30 April 2018 revised

1 February 2018: *Plan Appendix 6, Site Assessment in Crowmarsh Gifford*, 30 April 2018 revised

9 March 2018: Revised Draft Policies

Publication of the SEA, the amended Presubmission Plan and other associated documents were withheld until they had been reviewed and amended by O'Neill Homer. The entire documentation was then made available to the community on the Parish Council web site from 27 March 2020 in preparation for the Regulation 14 Consultation phase.

Dissemination of progress has been via the monthly Crowmarsh Parish Newsletter (distributed free to all households and businesses in the Parish). A pamphlet (Figure 1) was distributed with the March 2018 Newsletter. Two events have also been held:

Saturday 23rd September 2017 (10am-4pm) at Crowmarsh Gifford Village Hall and repeated Saturday 30th September (10am- 4pm) at North Stoke Village Hall: Neighbourhood Plan exhibition for the community to learn about the Neighbourhood Plan process and share ideas.

Tuesday 13 March 2018 (7.30 pm) at Crowmarsh School and repeated on Thursday 15 March at North Stoke Village Hall: meetings to explain what has been achieved so far and to put the preliminary findings to the community for discussion and informal consultation.

Much of the dialogue between the community and the Steering Group has been informal discussion in person, for example, 'at the school gates', and on social media.

Between 29 October and 25 November 2016 Crowmarsh Parish Council carried out a residents' survey to gather the views and ideas of those living in the community on future new housing in Crowmarsh. The survey was open to all residents of Crowmarsh, North Stoke and Mongewell, and was publicised on the Parish Council website as well as its Facebook page. It provides insight into the aspirations of the villagers and how they want the Parish to progress over the next 15 years.

CROWMARSH PARISH NEIGHBOURHOOD PLAN

Most of the data gathering for your Neighbourhood Plan has now been completed. The findings have been written up in a series of six reports that will become Appendices to the final Local Neighbourhood Plan report. All these reports are published on the web at <http://crowmarshgifford.org.uk/2017/04/15/local-community-plan/>. Paper copies of the reports will be available at two village discussion meetings where we can discuss the plan and what we want it to say. These meetings will be held at Crowmarsh School on 13 March at 7 pm and at North Stoke Village Hall on 15 March at 7 pm. Copies of the reports are also available at the Village Hall, the Pavilion and at the School Office in Crowmarsh Gifford and in North Stoke Village Hall.



The findings from the data gathering and analysis described in the reports have been brought together as a set of *Draft Policies*. These policies summarise what we as a parish actually want and what we don't want between now and the year 2031. The policies, once they are adopted, also

become part of the District Local Plan – so they are very important. Please have a read through the Draft Policies and bring your comments and observations to one of our meetings. We need to do this together, remember these are going to be your Policies to enable your vision for the Parish. We need to know if you agree with what they say, and, if you don't agree, what they should say. We look forward to talking about the Plan with you when we meet. You can also contact us through any member of the Parish Council at any time.

CROWMARSH PARISH DRAFT POLICIES CONSULTATION

POLICY 1 ENVIRONMENT

The Crowmarsh Parish Neighbourhoods will safeguard the countryside and the heritage sites within the Parish by upholding the guidelines and policies published by Government, its agencies, the Chilterns Conservation Board and others. Greenfield sites will not be developed for any purpose other than to support the management of the land.

POLICY 2 CROWMARSH GIFFORD HOUSING DEVELOPMENT

Crowmarsh Gifford is expected to grow by 2031 to the extent that 110 new dwellings plus infill development will be needed to house its anticipated growth in population. There will be an increasing proportion of elderly people in the village and provision needs to be made for such people to downsize, ideally, into 2-bed bungalow-type developments with small garden/patio areas. There is an increasing need for first time buyers' properties at affordable prices, although it is recognised that house prices are locally higher than the county average prices and significantly higher than the national average prices. There will also be an increased requirement for family accommodation. Two sites have been identified through a process of community opinion survey, landscape survey and site assessment that are most suitable to allocate as housing land supply to accommodate the required 110 new dwellings:

- The larger housing land allocation site is the land south of Newnham Manor known as CRO6 and CRO7, a site that lies within the former open parkland of the Manor, but is partly brownfield, partly derelict as well as some greenfield. This site is allocated 100 new houses of which 40% shall be affordable housing stock with a good social mix including two and three bedroom dwellings (development proposal now approved).

POLICY 5 PARISH DEVELOPMENT NEEDS

In-village road safety is a recurrent concern of parishioners. Newly configured and safe junctions are required at both ends of Benson Lane and traffic speed regulation is required also in Benson Lane. A pedestrian crossing is required for school children to cross The Street in safety near the intersection with Old Reading Road. Another crossing is needed on the A4074 to provide safe pedestrian access to Crowmarsh Hill, Robert Sparrow Gardens and Park View (to be installed as part of the Newnham Manor development). Traffic and safety will be reviewed periodically by the Parish Council to identify developing needs.

Access to primary and secondary education, as well as to health care facilities, are secondary concerns of parishioners both in Crowmarsh Gifford and North Stoke. Nevertheless, these important components of the supporting infrastructure will need to grow in capacity as demand increases to ensure the sustainability of the communities within the Parish. Some of these facilities are supplied by neighbouring Wallingford, some by Benson, but both these communities are under intense pressure to satisfy demand from new housing developments of their own, and will struggle to satisfy the requirements of a growing population in Crowmarsh Parish as well.

Recreational needs are a relatively low priority for most parishioners. Nevertheless provision of recreational facilities is an important part of the functionality of the Parish and will continue to be catered for as demand requires - including the new children's play area and adult exercise area proposed for the Recreation Ground.

POLICY 6 SODC SITE

The community looks forward to the return of the South Oxfordshire and Vale district councils to their site in Benson Lane. The community will assist with this process as best it can.

- The smaller site is a former quarry, a brownfield site, at the eastern end of Crowmarsh Hill which is a 1 ha plot situated at the northern end of site CRO9, land north of Cox's Lane and east of Park View. This site, referred to as CRO9a in the Appendices, is allocated ten affordable dwellings. Although within the AONB it is degraded land in need of reclamation.

No other sites will be supported for housing development during the tenure of the present Neighbourhood Plan. Housing development needs to progress in tandem with development of infrastructure and any housing development is conditional on this requirement.

POLICY 3 CROWMARSH GIFFORD EMPLOYMENT USE DEVELOPMENT

Land at Howbery Park between Howbery Manor, Benson Lane and Red Kite House is allocated for new development for employment use. Howbery Park is keen to attract new industrial units to this site which allows new employment opportunities to focus on this one location. The site is currently occupied by car parking and open land and is large enough to accommodate significant office or laboratory accommodation or a number of smaller units.

POLICY 4 NORTH STOKE AND MONGEWELL

Development of both North Stoke and Mongewell needs to be in line with the requirements of the Local Plan for small rural villages within valued landscape and AONB. However, Mongewell has an extant allocation of 166 new dwellings at the former Carmel College site, and this development will greatly increase the size of this hamlet. Housing development should otherwise be confined to infill or be contained within the built curtilage of the two respective neighbourhoods.

Crowmarsh Parish Council

Figure 1 Dissemination included the following leaflet distributed in Crowmarsh News, March 2018:

There is more information about the community survey on the survey report page, including the need for pedestrian crossings on The Street and the A4074 (Crowmarsh Parish Council web site):

How many new houses do you think Crowmarsh should have over the next 15 years?

Answer Options	Response Percent	Response Count
20-50	24.5%	37
51-100	45.0%	68
101-150	19.9%	30
151-250	7.9%	12
250+	2.6%	4
Population (n)		151

What types of housing would you most like to see?

Answer Options	Response Percent	Response Count
1-2 bedroom starter homes	52.7%	79
2-3 bedroom family homes	66.0%	99
1-2 bedroom apartments	20.7%	31
3-5 bedroom homes	21.3%	32
houses to buy	63.3%	95
houses to rent	24.7%	37
shared ownership	29.3%	44
Other (please specify)	16.7%	25
Population (n)		150

What other amenities do you think Crowmarsh would need or benefit from?

Answer Options	Response Percent	Response Count
Crossing on A4074	58.4%	87
Crossing on The Street	51.7%	77
Indoor sports hall	35.6%	53
More allotments	13.4%	20
Playground improvements	28.9%	43
Scout hut	16.8%	25
Other (please specify)	33.6%	50
Population (n)		149

Where do you think is the best place(s) for new houses in Crowmarsh Gifford?

Answer Options	Response Percent	Response Count
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A Behind Benson Lane / The Street	16.0%	24
B Behind Newnham Green	4.7%	7
C Behind Newnham Manor	52.7%	79
D Howbery Park	16.0%	24
E Former SODC site	75.3%	113
Other (please specify)	15.3%	23
Population (n)		150

A second questionnaire was issued to visitors to the September 2017 exhibitions and issued as a flyer in the October 2017 *Crowmarsh News* October 2017. Two survey forms were issued, one targeted at residents of Crowmarsh Gifford and available at the Crowmarsh Exhibition held on 23 September and the other at North Stoke issued at a similar Exhibition held on 30 September. Residents of Mongewell were asked to complete either form.

The three Crowmarsh Gifford questions were:

1. Crowmarsh Gifford will have to allocate land for about 110 new homes. Where would you prefer to see them built?
 - a. Behind Newnham Green
 - b. Behind Newnham Manor
 - c. Land east of Benson Lane north of The Street
 - d. SODC offices site
2. What would you like the SODC site to be used for, should it become available?
 - a. Housing
 - b. Industry / business / offices
 - c. A new site for the primary school
 - d. Care home
 - e. Leisure centre
3. What are your top concerns for Crowmarsh Gifford?
 - a. Access to doctor's surgery
 - b. Primary and secondary schools at capacity
 - c. Traffic volumes in the village at peak times
 - d. Poor access to shops
 - e. Inadequate public transport

And those for North Stoke:

1. What are your top concerns for North Stoke?
 - a. Traffic speeds through the village at peak times
 - b. Poor access to shops
 - c. Housing development
 - d. Inadequate public transport

2. Crowmarsh Gifford will have to allocate land for about 110 new homes. Where would you prefer to see them built?
 - a. Behind Newnham Green
 - b. Behind Newnham Manor
 - c. Land east of Benson Lane north of The Street
 - d. SODC offices site

3. What would you like the SODC site to be used for, should it become available?
 - a. Housing
 - b. Industry / business / offices
 - c. A new site for the primary school
 - d. Care home
 - e. Leisure centre

Respondents were asked to rank their first three preferences for each question and could, if they so wished, write in their own preferred option. A total of 171 completed forms were returned, 150 for Crowmarsh Gifford and 21 for North Stoke.

During the course of the survey the South Oxfordshire and Vale DCs announced their intention to return to their abandoned site at Benson Lane where they plan to build new offices. The questions about this site thus became invalid although the Councils' decision has since been reversed.

At Crowmarsh Gifford, housing allocation was overwhelmingly in favour of developing the SODC site in preference to any other (Figure 2). However, the announcement that this site was no longer an option for housing development was accommodated by transposing second choices, where SODC had been first choice, to first choice and this produced the distribution shown in Figure 3. Development of the Newnham Manor site was clearly the preferred option with 62 % of the vote in favour of allocating this site for housing. Distribution of the vote was largely Crowmarsh village residents west of the A4074 in favour of Newnham Manor, Crowmarsh residents east of the A4074 in favour of land east of Benson Lane and Newnham Green.

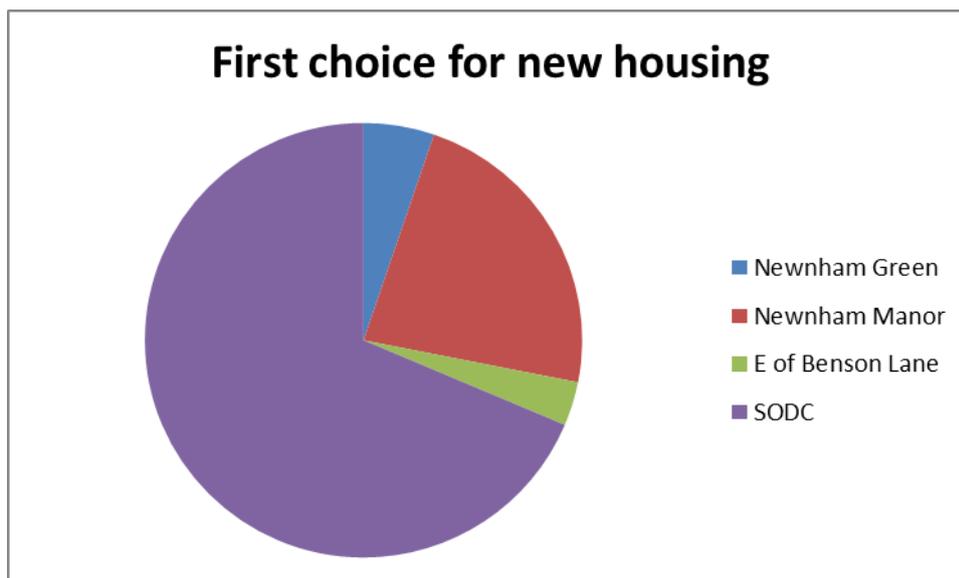


Figure 2 Crowmarsh Gifford resident's preferred housing allocation sites including SODC site

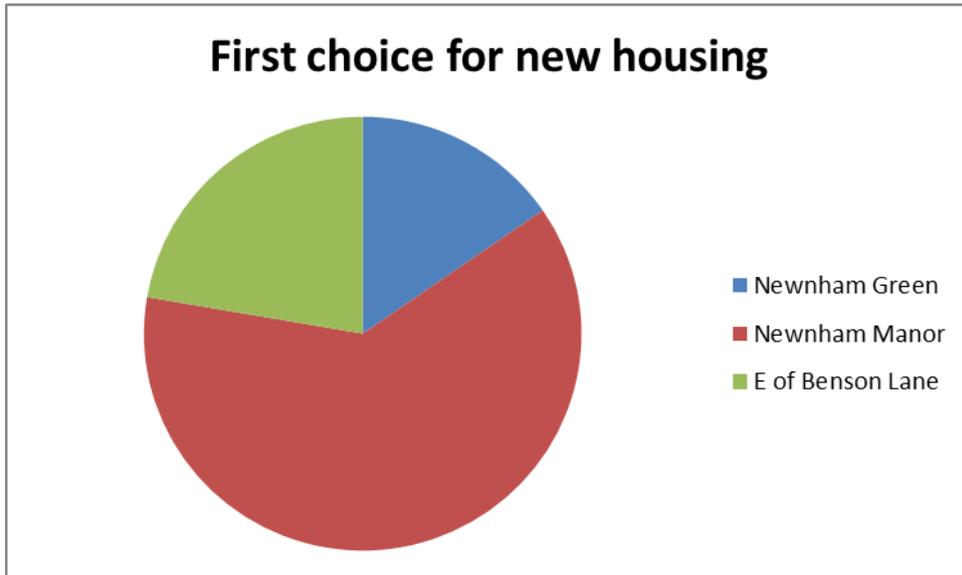


Figure 3 Crowmarsh Gifford resident's preferred housing allocation sites after transposing choices to remove SODC option

Had the SODC site remained a development option, 52% saw it as the best place for housing and 19% wanted it as a new site for the primary school. However, these responses are now academic.

The third question regarding villager's concerns produced some surprises. The perception was that the majority of residents worried about access to their GP and parents worried about schooling for their children. This was not the case (Figure 4) as the majority of 54 % were most concerned about traffic volumes in the village at peak times with schooling and access to doctors very much taking joint second places.

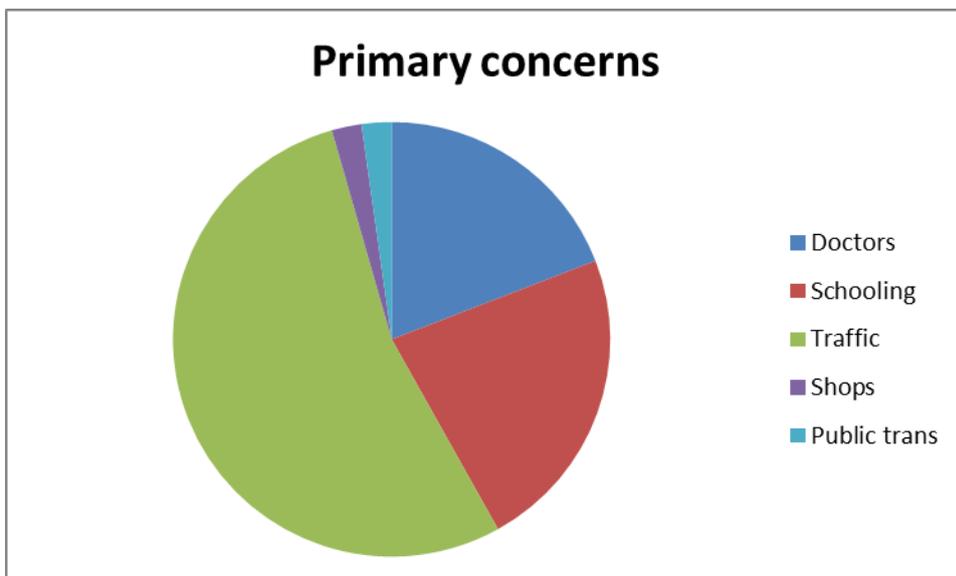


Figure 4 Crowmarsh Gifford resident's primary concerns

The top concerns in North Stoke were traffic speeds at peak times and housing development both polling at 42% of the 21 returns (Figure 5). Traffic speeds are an expected response whereas housing

development maybe a reflection of the current proposal to develop part of the field to the south of the former Springs Hotel. This latter concern was voiced repeatedly at the exhibition.

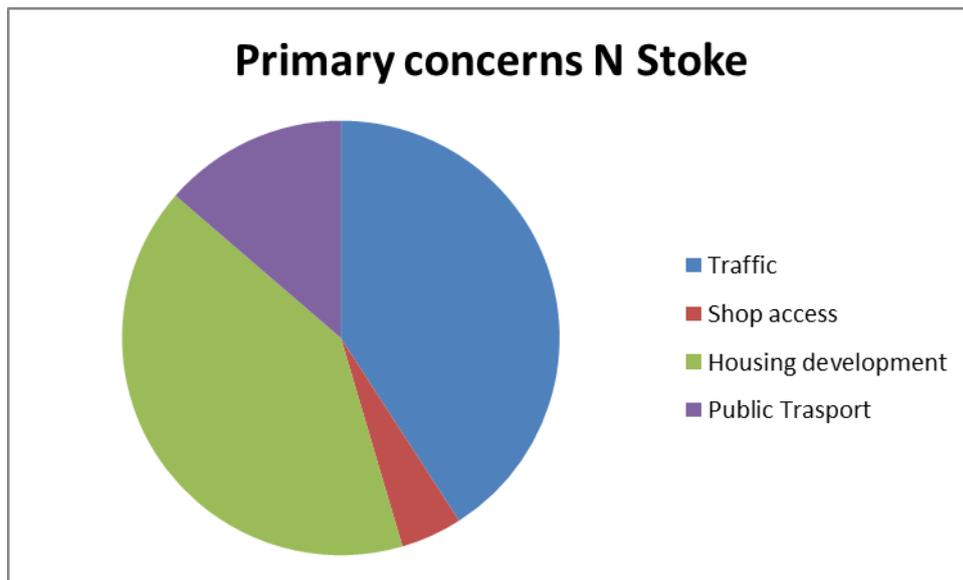


Figure 5 North Stoke resident's primary concerns

No obvious preferred site was apparent from the small population of residents that returned the North Stoke form. This small population did not allow a reliable preference to be identified for the allocation of land for housing development in Crowmarsh Gifford. Similarly, no obvious preference for the development of the SODC site at Crowmarsh Gifford was apparent, again a question that has become academic.

Sufficient numbers of returns, 150 in total, were available from residents in Crowmarsh Gifford to identify their preferred options. Two significant preferences are apparent:

1. A majority preference for villagers for a site for housing allocation is land behind Newnham Manor, with residents east of the A4074 alone in favouring other sites.
2. The key concern of residents in Crowmarsh Gifford is traffic levels at peak times. Access to GP and schooling being very much of secondary concern.

The North Stoke population of just 21 respondents was barely enough to provide reliable statistics other than on question 1 regarding resident's concerns. These concerns were both traffic speeds on the main road through the village and the threat of housing development in the village.

Whilst community preferences on housing have largely been overtaken through the consideration of planning applications, the provision of a settlement boundary reflects community wishes in this regard.

The importance of other matters, notably traffic management, has also been discussed with the community and is reflected in the policies of the plan.

4. Regulation 14 Consultation

The Regulation 14 Consultation was delayed due to the Coronavirus pandemic but was allowed to start in June 2020. Advice received from the Planning Authority was acted upon and included:

Making people aware that the consultation is taking place

- Make hard copies of relevant documents available
- Public notices
- Fliers
- Notice boards
- Local publications
- Posters

Reaching hard to reach groups

- Use posters/notice boards to ask general population to make other people aware - particularly hard to reach groups such as those shielding.
- Ask PC/TC, local community groups and charities to disseminate information and encourage participation.

Giving people a reasonable chance to participate effectively

- Extend consultation period
- Being available over the phone to explain proposals in the plan and provide advice on how to engage in the process.
- Providing hard copies where necessary.

The consultation period was extended to eight weeks and ran from Friday 26 June until Friday 21 August. In addition, a community webinar was suggested, but organisation of such proved beyond



 **CROWMARSH PARISH COUNCIL**

Crowmarsh Parish Neighbourhood Plan

PUBLIC CONSULTATION

You are invited to submit your comments on the Crowmarsh Neighbourhood Plan. Please send them by **email to the Parish Clerk** or drop a note into the letter box at the pavilion on the recreation ground.

The Plan is now on the **Crowmarsh parish website**. Printed copies are available from Crowmarsh Stores.

Crowmarsh parish clerk:
crowmarshparishclerk@gmail.com

Crowmarsh parish website:
<http://crowmarshgifford.org.uk>

the means of the Steering Group within the National Lockdown. Posters were displayed on all Parish Notice Boards. Formal consultation invitations were sent to the statutory consultees and to an additional 39 invited consultees as advised by the Planning Authority. The Pre-submission reports were made available on the Parish Council Web Site where members of the public were also invited to submit comments. All correspondence was from and to the Parish Clerk. Hard copies of the Plan document (100 copies) were advertised as being available for the public to take at the Crowmarsh Gifford Village Store and the Queen's Head Public House when they opened in July. A total of 85 hard copies were collected by the public or distributed by a Parish Council member in North Stoke. In addition, 20 copies of the SEA were also made available to the public. In addition to the posters, the following notice was placed in the April *Crowmarsh News* which is issued to every household in the Parish:

Neighbourhood Plan Regulation 14 Consultation

The Consultation phase of the Crowmarsh Parish Neighbourhood Plan commences shortly and your comments are now required. The Presubmission version of the Crowmarsh Parish Neighbourhood Plan, the supporting evidence reports – Appendices 1 through 5 of the Plan, the draft Strategic Environmental Assessment (Appendix 6c) and the posters that were intended for public meetings are available as pdf files on the Parish Council web site. Hard copies of the Plan are available from Crowmarsh Stores – please take these for neighbours that do not have access to the web.

Opportunities to talk about the Plan will be made available in August in the grounds of the two village halls – dates to be announced next month.

Please return any comments you would like to make by Friday 21 August, at the latest - by email to the Parish Clerk at crowmarshparishclerk@gmail.com or by hard copy via the Pavilion letter box at Crowmarsh Rec. The Parish Council is particularly keen to hear comments that will strengthen the Plan.

Please note that all responses will be catalogued and may be published in the Consultation Statement. The Consultation Statement will also provide details of consequent changes to the Plan as the outcome of the Consultation process.

The Reg 14 Consultees were:

Oxfordshire County Council

South Oxfordshire District Council

Vale of White Horse District Council

Ward members: Andrea Powell, Sue Cooper, Mark Gray

Benson Parish Council, Nuffield Parish Council, Ipsden Parish Council, South Stoke Parish Council, Cholsey Parish Council, Wallingford Town Council

The Coal Authority

Homes England

Natural England

Environment Agency

Historic England

Network Rail

Network Rail

Highways England

Marine Management Organisation

BT

EE

Three

EMF Enquiries - Vodaphone & O2

Oxfordshire Clinical Commissioning Group

NHS England

Wood Plc (on behalf of National Grid)

National Grid

Cadent (if relevant)

Scottish and Southern Energy Power (if relevant)

UK Power Networks

Thames Water - Developer Services

Chilterns Conservation Board

Crowmarsh Gifford C of E Primary School

Update on individual basis

Reverend Kevin Beer

Howbery Estate, Graham Leeming; CABI, Trevor Nicholls; UK Centre for Ecology & Hydrology, Mark Bailey; SODC Property Department; Earth Trust, Lucy Duerdoth

Brightwell-cum-Sotwell Parish Council were not consulted during the Reg 14 consultation phase because the qualifying body considered that their interests were not affected by the proposals in the Neighbourhood Plan.

A total of 13 responses were received as follows:

Government:	Oxfordshire County Council South Oxfordshire District Council
Statutory Consultees:	Natural England Historic England Environment Agency
Stakeholders:	Woolf Bond for Bloor Homes Arron Twamley for Avant Homes Thames Water Avison Young for National Grid Scottish & Southern Electricity Network
Parishioners:	Denise Hall, Crowmarsh Gifford Trevor Cotton, Crowmarsh Gifford Valerie Worrall

O'Neill Homer provided the following analysis:

REGULATION 14 ANALYSIS: STATUTORY BODIES

1. Introduction

1.1 This note summarises the representations made by the statutory bodies on the

Pre-Submission version of the Crowmarsh Parish Neighbourhood Plan (CNP) during its recent 'Regulation 14' consultation period. It concludes by recommending main modifications to the CNP so that it may be submitted to the local planning authority, South Oxfordshire District Council (SODC), to arrange for its examination and referendum.

2. Representations

2.1 Representations have been received from:

- Oxfordshire County Council (OCC)
- SODC
- Natural England (NE)
- Historic England (HE)
- Environment Agency (EA)
- Wolf Bond Planning (WBP) on behalf of Bloor Homes Ltd and Hallam Land Management
- Arron Twamley Planning (ATP Ltd) on behalf of Avant Homes
- Thames Water
- Avison Young on Behalf of the National Grid
- Scottish and Southern Electricity Networks (SSE)

2.2 Adjoining parishes were consulted but none have made representations. NE and SSE representations raised no specific issues on the CNP. The EA supports the CNP, especially in respect of proposed allocations having been directed to the areas at the lowest probability of flooding.

2.3 The NG confirms the location of their assets and provides guidance for developers on developments close to their infrastructure. Thames Water confirms the position with regards to surface water drainage and water and wastewater network upgrades encouraging early engagement with developers. The information provided establishes the local position which can be included in Section 2 of the plan.

3. Analysis

3.1 Other representations, notably those of SODC, include suggested minor modifications to the text of the document, as well as those of more consequence. This note focuses only on those of greater substance as all those of minor consequence can be addressed in finalising the document.

3.2 SODC is mainly supportive of the preparation of the plan but suggest some modifications. In relation to Policy CRP1 it recommends that planning permissions, which have not yet been built out, are excluded from the settlement boundary. WBP and ATP Ltd has focused its comments, as representatives to respective landowners of residential development, on the inclusion of sites within the settlement boundary. OCC, SODC, HE, and WBP also highlight some inconsistencies in the application of the methodology used in drawing the settlement boundaries. Specifically, WBC objects to the commercial uses at Howbery Business Park being excluded and

suggests modifications if the policy is to be retained in its current form.

3.3 The Steering Group adopted the Cheshire East methodology for defining settlement boundaries, however its application can be adapted to suit the operation of SODC as the Local Planning Authority. In which case, criterion a) can be excluded for that reason. All boundaries should be reviewed against the revised criteria for accuracy; however, it is considered that the assessment conclusion to exclude Howbery Business Park from the settlement boundary remains valid.

3.4 SODC has queried the approach of Policy CRP3 in relation to the key development principles to manage the potential effect of the site and the size of the site that has been allocated. The Steering Group has confirmed that the size of the allocation will be rectified to reflect the need identified in the emerging Local Plan. The approach to setting out key development principles and relating these to ‘administrative processes’ has been successful in a number of examinations.

3.5 Although no representation has acknowledged the changes to the Use Class Order that have come into effect since the end of the consultation period, the wording of Policy CRP3 will require some modification. ‘Employment’ uses are now classified as follows:

Use	Use class up to 31 August 2020	Use class from 1 September 2020
Office either than a use within Class A2	B1a	E
Research and development of products or processes	B1b	E
For any industrial process (which can be carried out in any residential area without causing detriment to the amenity of the area)	B1c	E
Industrial	B2	B2
Storage and Distribution	B8	B8

3.6 Changes of use within the same class are not development and so other uses included in Class E is demonstrated overleaf:

Use	Use class up to 31 August 2020	Use class from 1 September 2020
Shop not more than 280sqm mostly selling essential goods, including food and at least 1km from another similar shop	A1	E
Shop	A1	E
Financial and professional services (not medical)	A2	E

Café or restaurant	A3	E
Clinics, health centres, creches, day nurseries, day centre	D1	E
Gymnasiums, indoor recreations not involving motorised vehicles or firearms	D2	E

3.7 South Oxfordshire’s Employment Land Review, September 2015 recognises that the industrial market is more significant in South Oxfordshire than the office market and the key sector at Crowmarsh Gifford are Environmental Sciences. It defines Industrial supply as B1c, B2 and B8 uses classes. An agreement with SODC on the definition of ‘employment land’ to be delivered in Crowmarsh Gifford as set out in emerging Policy EMP8 will therefore be necessary.

3.8 SODC has queried the approach of Policy CRP4 in its attempt to deal with a number of distinctive themes as one condensed policy, failing to include local detail and take existing policies into consideration. The policy does currently attempt to cover heritage and landscape matters and the majority of its content is already covered by national and strategic policy and the policy lacks Parish specific information. The Steering Group should consider whether it has prepared sufficient evidence to address more specific design, heritage and landscape issues.

3.9 SODC question the extent of evidence provided in relation to policies CRP5 Locally Listed Buildings and CRP6 Green Spaces and also draws attention to the revised timetable of the emerging Local Plan. The consultation period on the Proposed Main Modifications is scheduled to be completed by midnight on Monday 2 November 2020 and adoption anticipated in early 2021.

4. Conclusions & Recommendations

4.1 The representations are generally supportive of the CNP and, with some modifications as recommended below, it is considered that it can proceed to the Regulation 15 submission stage without further consultations.

4.2 The comments on the settlement boundaries require modifications to be considered. Boundaries should be reviewed against the amended criteria.

4.3 The changes to the Use Class Order require modifications to Policy CRP3. The inclusion of Class B1c in Class E means that there is much greater flexibility to change the use within the wide range of uses in Class E than was previously the case. It is therefore recommended that Policy CRP3 is revised to clarify the definition of employment use once these points are raised with SODC prior to completion of the final CNP.

4.4 With regards to additional evidence to support policies CRP5 and 6,

neighbourhood plans should be supported by proportionate, robust evidence (PPG 41-040).

4.5 To support Policy CRP5 a short section should be introduced at Appendix 2 to detail the features that make the heritage significance of the asset stand out above the surrounding environment. Table 1, Page 9 of Historic England's Local Listing Advice Note contains commonly applied selection criteria for assessing suitability of assets for local heritage listing.

4.6 To support Policy CRP6 expand paragraph 5.29 to demonstrate how the proposal satisfies the NPPF requirements. See paragraph 5.20 of the made Sydenham Neighbourhood Plan as an example.

4.7 The Neighbourhood Plan must be able to show that its policies are in general conformity with the strategic policies of the development plan, which during its preparation has comprised the Core Strategy adopted in 2012 (covering the period to 2027) and a number of saved policies from the Local Plan adopted in 2006.

4.8 The Steering Group has indicated that there are no pressures driving the timetable of the Neighbourhood Plan. If this continues to be the case, as it is expected that the new Local Plan, which replaces both the Core Strategy and 2011 Local Plan, and will cover the period to 2035, will be adopted in early 2021, it is recommended that the Submission Plan is modified to demonstrate conformity with the emerging Local Plan which at the time of the examination of the Neighbourhood Plan is likely to be adopted.

4.9 With these modifications it is recommended that the CNP proceeds to Regulation 15.

Actions requested or suggested by Reg 14 consultees regarding the draft Plan Document, the draft SEA plus supporting documents are summarised below and the consequent changes that have been made to the Neighbourhood Plan, SEA and supporting documents are described.

It is disturbing to read that while both Oxfordshire County Council and Woolf Bond acknowledge that Crowmarsh Gifford Village is designated as an independent larger village, they both perceive Crowmarsh Gifford as part of the growing Wallingford conurbation and their comments are coloured accordingly. The justification for this misleading perception appears to be simply that 'Crowmarsh Gifford lies within the Wallingford Bypass'.

GOVERNMENT: OXFORDSHIRE COUNTY COUNCIL			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	The introduction makes reference to the emerging policies of the SODC Local Plan as being under a Temporary Holding Direction (paragraph 1.1). This has been lifted and the introduction should be amended to reflect the current status of the South Oxfordshire Local Plan, which at the time of writing is at Examination. A correction is also required at paragraph 3.13, 'Natural Beauty Management Plan 2014-12019'	Para 1.1 updated Para 3.13 corrected
2.	Strategic planning	We note paragraph 2.2 which usefully explains the consented developments. However, it is not clear what is meant by 'intense infrastructure development' and we recommend that this sentence is amended or deleted for the Submission version of the Plan.	Para 2.2 amended as recommended
3.	Strategic planning	Policy CRP3 allocates 2.2ha of land at Howbery Park for employment use. It is understood that this is in accordance with the adopted development plan which is the Core Strategy. We recommend that this is clearly mapped in the submission version of the Neighbourhood Plan.	Policy CRP3 changed to plot of 0.28 ha as stated in the Core Strategy
4.	Strategic planning	Paragraph 4.3 sets out six major concerns regarding rapid and significant expansion of the housing stock which relate to: <ul style="list-style-type: none"> • Primary school capacity • Medical centre capacity • Use of the Wallingford bridge and the AQMA in that area • Lack of retail facilities • Utility capacity • Effects on heritage assets In addition to the above, in paragraph 4.6 a key concern noted is traffic management. In paragraph 6.4 it is noted that there may be opportunities to secure financial contributions to invest in improving local infrastructure. While such investments are aspirations, it could be useful for the submission Neighbourhood Plan to	Para 4.3 amended and infrastructure improvements added

		provide more detail of infrastructure improvements sought.	
5.	Strategic planning	The submission Neighbourhood Plan would benefit from providing more maps and details of the consented developments. We also think it will be desirable to have an evidence report about other potential developments, which can be used in future to complement the District's strategic housing land availability assessments.	The consented developments are referred to by Planning Application number which provides access to site details. Evidence report on other areas removed at request of Planning Authority when the decision was made not to allocate further land for housing in the Plan – hence no action taken on this suggestion.
6.	Waste strategy	New homes should have space for recycling bins and suitable access for collection.	This is covered in the emerging Local Plan – hence no action taken.
7.	Digital infrastructure	Digital infrastructure should be built in to new homes.	This is covered in the emerging Local Plan – hence no action taken.
GOVERNMENT: SOUTH OXFORDSHIRE DISTRICT COUNCIL (PLANNING DEPARTMENT and PROPERTY DEPARTMENT)			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	We note that you have titled your maps, however Figures 1 and 8 have not referenced your Public Sector Mapping Agreement (PSMA) number, whereas the other relevant maps do. We recommend referencing this source information against all figures (this includes evidence base documents). Furthermore, currently Figure 9 incorporates four maps. It would be better for clarity if these were sourced and titled separately (see later comments for additional points regarding specific figures).	All figures and maps have been sequentially numbered and Figure 9 split into four separate listings, as 9, 9A, 9B and 9C.
2.	General comment	Please note that as your Neighbourhood Plan does not allocate any housing, it will not benefit from the protection given by paragraph 14 of the NPPF.	Noted.
3.	General comment	The Neighbourhood Plan area contains priority habitats, protected species records, ancient woodland and part of the Thames: Wallingford to Goring Conservation Target Area. It does not appear that the policies of the plan acknowledge these features. The value of Riverside	New area-wide policy CRP5 has been added to the Plan entitled 'Protection and enhancement of ecology and biodiversity'.

		<p>Meadows could also be highlighted within the plan. Cattle graze Riverside Meadows as a form of management, but the site is important in its own right. Various biodiversity projects have been implemented on the site and it is part of Natural England’s countryside stewardship scheme. It is recommended that the Parish Council liaise with the Earth Trust over the ongoing management of Riverside Meadows to understand the site’s social and environmental value as a community asset. The improvement of biodiversity is identified as a vision of the parish but is not translated into the objectives of the plan, and only makes a brief appearance in policy CRP3. The reasoning included in the SEA to justify inclusion of biodiversity wording in CRP3 could be applied to development across the entire Neighbourhood Plan area. The Neighbourhood Plan could strengthen its approach to the protection and enhancement of biodiversity within the parish. It may be appropriate to have an area-wide policy which requires development to take account of biodiversity impacts and secure net gains. The position of the parish adjacent to the River Thames make it in an ideal location to secure tangible gains for biodiversity, even through a piecemeal approach. Biodiversity recommendations against the specific policies are included within the comments for those policies.</p>	<p>Detail regarding Riverside Meadows has been added at paragraph 5.37.</p>
4.	Paragraph 1.1	<p>The Plan refers to the Secretary of State writing to South Oxfordshire District Council on 9th October 2019 to impose a Temporary Holding Direction. Please note that on 3 March 2020 the Secretary of State issued South Oxfordshire District Council with a Direction under Section 27 of the Planning and Compulsory Purchase Act 2004. This directs the Council to progress the plan through examination to be adopted by December 2020, and for senior council officers to report monthly to MHCLG officials</p>	<p>Paragraph 1.1 updated</p>

		on progress of the plan. Therefore, this paragraph is out of date and should be updated to reflect the latest information.	
5.	Paragraph 1.5: Vision	The first two sentences of the Vision set out a factual account of the Parish and the current situation, rather than explaining the future vision for the plan area. It is recommended that these sentences are either deleted or moved to Chapter 2 which sets out information about the Parish. Usually the Vision is followed by the Objectives of the Plan in order to set the scene and for the reader to understand what the Plan is intending to achieve. We recommend that you include the Objectives under the Vision to help ensure the Plan has a clear and coherent narrative. Furthermore, your policies should be directly related to the Objectives of your Plan; to highlight how the policies are helping to achieve your Objectives and Vision it is recommended that each policy has a clear link to the Objective it is intending to address (suggest this is done alongside the policies in Chapter 5 rather than alongside the objectives).	Vision amended by removing the first two sentences. Objectives moved from Section 5 to sit under the Vision in Section 1. Explanation text beneath each Policy in Section 5 has an initial paragraph added to highlight how the Policy links to each Objective.
6.	Paragraph 1.8: Neighbourhood Plans must comply with the basic conditions	We note that you have referred to the basic conditions. Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 sets out the basic conditions that are relevant to Neighbourhood Plans. These are: a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or Neighbourhood Plan). d. the making of the order (or Neighbourhood Plan) contributes to the achievement of sustainable development. e. the making of the order (or Neighbourhood Plan) is in general conformity with the strategic policies contained in the development plan for	Basic conditions 'b' and 'c' removed.

		the area of the authority (or any part of that area). f. the making of the order (or Neighbourhood Plan) does not breach, and is otherwise compatible with, EU obligations. g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or Neighbourhood Plan) Please amend the reference so it refers to the relevant basic conditions.	
7.	Figure 5	The map of the extent of the AONB is not clear. It would be better to have the parish boundary as an outline and a coloured/hatched area showing the extent of the AONB.	Map amended by thickening line-work.
8.	Figure 9	The first map is titled Inset A, whereas it should be Figure 9 (as described in the supporting text above). Currently there are 2 'Inset A' and this should be rectified for clarity.	Figure and map numbering corrected.
9.	Policy CRP1: VILLAGE BOUNDARIES AND INFILL DEVELOPMENT	We note you have used the Cheshire East methodology, but this information is included in Chapter 3 under 'Policy Context' rather than within the supporting text for the policy. We would recommend moving the explanation for the boundary placement to Chapter 5 so it is clear to the reader how the boundary has been drawn. Please be aware of the potential unintended consequences of including sites which have been approved at planning application but not yet built out within your settlement boundary. One relates to the schemes being revised once the Neighbourhood Plan is made; the inclusion of such sites inside the boundary may lend support to less sensitively designed schemes on these sites. Another is the inclusion of what may be green/open space on the edge of the site being considered as within the settlement boundary where it would otherwise be considered outside of the boundary if the settlement boundary methodology was applied after the scheme has been built out. If you are proposing to include such sites within the proposed	Cheshire East methodology moved to text beneath Policy CRP1. Requirements for Newnham Manor development added and set out in paragraph 5.15. Other site included in Settlement Boundary is now under construction and no longer green field. Area of approved, but unbuilt and stalled development proposal at Mongewell has been removed and settlement boundary tightened around existing buildings. Settlement boundary has been tightened around existing buildings at North Stoke.

		<p>boundary, you should produce detailed site allocation policies that ensure any revised schemes are not less sensitively designed. Alternatively, you could remove these sites from the settlement boundary until they are built out and then when/if the Plan is reviewed you could implement the methodology related to permanent physical boundaries of the built form to ensure it is consistent. We would also recommend reviewing the boundary drawn for the smaller settlements to ensure they are tight to the built form, robust and whether inclusion of the boundary meets your objectives. For example, in Mongewell in particular, the settlement pattern is fairly disparate and there are large areas of open space included within the boundary. In addition, it is unclear why there is a large area of green/open space included within the boundary to the south of the settlement.</p>	
10.	Policy CRP2: HOUSING MIX AND TENURE	<p>There is currently no reference to the Local authorities Design Guide within the Neighbourhood Plan. The South Oxfordshire Design Guide is a material consideration forming part of the discussion making process for development and needs referencing where appropriate within the Neighbourhood Plan. We would recommend making mention of the Design Guide within the policy e.g. (suggested wording included as bold highlighted text): “A. Proposals for new residential development will be required to demonstrate a mix of dwelling types and sizes which: A. Meet the needs of current and future households, and B. Address the district wide shortage of smaller houses, and C. Are appropriate to the site in terms of style and design, and D. Demonstrate they have followed all relevant principles within the South Oxfordshire Design Guide.”</p>	Policy CRP2 amended to include reference to Design Guide as recommended.

11.	Policy CRP3: LAND AT HOWBERY PARK, BENSON LANE, CROWMARSH GIFFORD	The policy requires a biodiversity strategy, a transport assessment, a flood risk assessment and sustainable drainage strategy within the policy which are administrative requirements that would be dealt with as part of the application process. It is recommended that reference to these strategies/assessments are removed from the policy and instead the policy refers to intended/expected outcome i.e. 'development proposals are required to achieve a net gain in biodiversity'. If you can give additional detail as to how this may be achievable (i.e. through additional planting etc) the policy will be more robust. Please see comments on the site assessment appendix for additional points relating to the additional up take in employment requirement that you are proposing through the NDP.	Policy CRP2 amended as recommended with strategies and assessments changed to intended and expected outcomes.
12.	SITE ASSESSMENT CROWMARSH GIFFORD (evidence base document)	The Introduction gives the impression that a site will be allocated for housing. It is recommended that this is amended so it is clear from the outset that this is not the case. For clarity it is recommended that a separate title 'Methodology' is included to explain the process undertaken; currently this information is included within the 'Housing and Employment Requirement' section. The evidence document identifies that "Emerging Local Plan Policy EMP 8 requires 0.28ha land to be allocated for employment use at Crowmarsh Gifford" however the Plan allocates 2.2ha of employment land with no justification as to why additional land is required. Whilst we would be supportive of any NDP being positive in their approach to employment, we would like to see the evidence behind this to ensure you have a sound basis for this approach. We recommend including additional information as to where the reasoning for the larger allocation stems from.	Text clarified to state that there is no allocation made for housing. Methodology subtitle added and methodology text expanded. Evidence document changed to allocate a portion of land 0.28 ha rather than 2.2 ha, and this smaller plot is carried forward into the Plan Policy CRP3. The larger plot size was in error.

13.	Policy CPR4: CONSERVATION OF THE ENVIRONMENT	<p>Overall this policy is overly restrictive and unduly onerous. It is also apparent that this policy is trying to deal with a number of distinctive themes within one condensed policy – e.g. views, footpaths, AONB. It currently does so inadequately, as it lacks detail and fails to have regard to existing policies on those matters. The draft policy also attempts to duplicate the requirements of the proposed settlement boundary policy in an inappropriate manner. We recommend you address the distinctive environmental themes identified within this policy separately as individual policies. The policy does not make provision for ecology or biodiversity, which is a key piece of the natural environment. An area-wide policy on biodiversity could be introduced. You may also wish to use wording from other made NDPs which can be found on the policy table here.</p>	<p>Policy CRP4 has been amended as recommended with duplication from Policy CRP1 removed. Reference to National Policies has been added.</p> <p>A new Policy CRP5 which deals with ecology and biodiversity on a parish-wide basis.</p>
14.	Policy CRP5: LOCALLY LISTED BUILDINGS	<p>Appendix 2 sets out an introduction to the environment of the parish and includes general information on the heritage and history of the area. It does not include detail on the reasoning for locally listing the buildings included in the policy. You need to ensure there is robust justification that is supporting their significance value. Appendix 2 needs to be updated considerably to include information about the emergence and historic development of Mongewell and North Stoke, as well as Crowmarsh in order to support the inclusion of non-designated assets from these settlements. Then, the proposed nondesignated heritage assets should be described individually stating their heritage significance at this local level and ideally photographed in order to accurately identify them for the benefit of the policy. The identification of these assets should be done in accordance with the Historic England Advice Note 7: Local Heritage Listing (2016). Without this,</p>	<p>Pre-submission Policy CRP5 Locally Listed Buildings, has been deleted due to inadequate justification for the listings described in that policy.</p>

		the policy is not sufficiently evidenced to be sound and should be removed from the plan.	
15.	Policy CRP6: GREEN SPACES	In paragraph 5.29 you highlight the criterion that NPPF paragraphs 99 and 100 identify should be met to designate a Local Green Space. However, you haven't set out in detail how the site has met the criteria. We would recommend additional detail is added to this section to show clearly how the site meets the criteria. It is also not clear whether the landowners of the sites identified have been contacted and consulted. We would recommend this is undertaken, if you have not already done so. The Public Open Spaces identified in the plan also have ecological value. The intrinsic ecological value of these areas and the role that these areas play in linking people to accessible green/blue space could be highlighted within the policy. It is recommended that provision within policy CRP6 is made to ensure that any development within or adjacent to these identified areas of green space ensure that the biodiversity value of those sites is not adversely impacted	New paragraph 5.37 added to demonstrate how the Local Green Space meets the criteria listed in paragraphs 99 and 100 of the NPPF. Comment added on preserving the ecological value and settings of the Public Open Spaces from any development in adjacent land. The role of these spaces has been highlighted.
STATUTORY CONSULTEE: NATURAL ENGLAND			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	Natural England does not have any specific comments on this draft Neighbourhood Plan or draft SEA.	None.
STATUTORY CONSULTEE: HISTORIC ENGLAND			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	Policy CRP1: VILLAGE BOUNDARIES AND INFILL DEVELOPMENT	Our main areas of interest with the plan are the establishment of settlement boundaries and allocation of sites for development. With regard to Policy CRP1, we note that the defined boundaries include some areas of large gardens, fields or school playing fields on the edge of the settlements. As the definition of a settlement boundary	The area south of Marsh Lane within the settlement boundary (Inset Plan A) is now under construction and no longer green field. That to the west of Meadow Lane is the community's preferred site for development and is currently holding a resolution to grant permission for development. Both sites are,

		<p>creates a presumption in favour of development within the boundary and such areas of low density of development would normally be considered outside the built-up area, we recommend the steering group give careful thought to the appropriateness of the inclusion of land such as the fields south of Marsh Lane and west of Meadow Lane (inset Plan A), for instance, unless these have existing and current planning permissions or are allocated for development within the local plan.</p>	<p>therefore, retained within the Crowmarsh Gifford Settlement Boundary.</p> <p>Area of approved, but unbuilt and stalled development proposed at Mongewell has been removed and settlement boundary tightened around existing buildings.</p> <p>Settlement boundary has been tightened around existing buildings at North Stoke with parts of longer gardens removed from within the Settlement Boundary.</p>
2.	<p>Policy CRP3: LAND AT HOWBERY PARK, BENSON LANE, CROWMARSH GIFFORD</p>	<p>Policy CRP 3 allocates land at Howbery Park, adjacent to the listed buildings of Howbery Park, including the 19th century mansion house and complex of stables, lodge and cottages to the north. We would question whether this allocation is necessary, or whether this is already the accepted use of this land (albeit it is currently green open space within the existing business park). A Strategic Environmental Assessment has identified potential for harmful impacts to the historic environment through change in the setting of the listed buildings and mitigation recommended is included in the allocation policy. We note, however, that this is not reflected in the site assessment document currently included in the supporting documents and request that this is updated to provide the more rigorous approach of the SEA prior to the submission of the plan for examination. Indeed, where the SEA has identified the potential for this harm there is a need to demonstrate understanding of the significance of the listed buildings that could be affected and of how the land contributes to their significance as setting to ensure the mitigation is appropriate and sufficient or that residual</p>	<p>The allocated land area has been reduced to a small 0.28 ha plot adjacent to the car park to the east of Howbery Manor. Importance of preserving the setting of the Grade II listed Howbery Manor has been emphasised in the Policy and intended and expected outcomes added to conserve and enhance the setting of the Grade Two Listed Building. The reduced allocation area ensures that views of Howbery Manor will still be available from Benson Lane and from the recreation ground to the south.</p> <p>These changes have also made within the site assessment document in order that document properly underpins the SEA.</p>

		harm is properly justified. This contribution of setting to significance could be through, for example, the land forming part of a planned view to or from the listed buildings, providing part of a formal landscape that was designed as the setting to enhance the building, or simply being an area from which the architectural or historic interest can, fortuitously, be appreciated and/or enjoyed. In each case the appropriate mitigation could be different.	
3.	Howbery Park and CRO3	<p>1. Given that considerable employment development has already transpired in the surrounding area it would also be helpful to look at the planning history and any existing heritage assessments for Howbery Park prepared for these sites to draw out how this has been assessed and, possibly, why this land was not previously developed in a similar way. Having reviewed the Landscape Survey and Impact Assessment and the Environment and Heritage Evidence paper, neither document has really explored the site specific issues, although there are some tantalising suggestions of the archaeological interest of Howbery Park.</p> <p>2. Looking at the various documents there seem to be several different boundaries to the site CRO3 and, as such, we recommend reviewing these to ensure that all assessments relate to the same plot.</p>	Noted.
4.	Need for site allocation for employment use?	Whilst a site allocation may not be necessary to secure the employment use of this land, where there is a likelihood that development of this land will come forward we can see value in maintaining a specific policy that sets out the expectations and requirements for development, including matters of design as a means of supporting the delivery of sustainable development.	Noted.
5.	Policy CPR4: CONSERVATION OF THE ENVIRONMENT	Policy CRP4. We would be grateful if you could update the reference to English Heritage in this policy to Historic England.	Reference changed from English Heritage to Historic England.

STATUTORY CONSULTEE: ENVIRONMENT AGENCY			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.	Noted.
STAKEHOLDER: WOOLF BOND FOR BLOOR HOMES			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	Emerging strategic Policies of the District Local Plan	<p>1.Of particular relevance is the statement in second part of paragraph 2.4 of the draft Submission Plan. This states that there is no need for additional homes to be delivered in the parish to 2034 by virtue of the quantum of homes approved. As indicated above, through the ongoing examination of the Local Plan, both the overall quantum and distribution of development around the district could readily change and this would then necessitate a need to identify further sites. It is therefore important that the approach of the Draft Submission Neighbourhood Plan does not prevent this potential.</p> <p>2.This is especially important with respect of the current arbitrary cap of 15% with respect of the growth in dwelling stock (paragraph 3.6 of draft Submission Neighbourhood Plan). Additionally, although the draft Neighbourhood Plan contends that it has exceeded the quantum of development, no information on the sites relied upon to reach this conclusion are provided. As indicated below, the land at Newnham Manor has unjustifiably been included within the settlement boundary although it does not have planning permission. If this forms part of the contended surplus in the supply within the parish negating further appropriate and suitable allocations, this is a further</p>	<p>1.Noted.</p> <p>2.Planning proposal for land at Newnham Manor has a resolution to grant planning permission. It remains included in the settlement boundary as it is the community's preferred development site and is partly a brownfield site.</p>

		reason why the approach of the draft Neighbourhood Plan is unjustified.	
2.	Policy CRP1: VILLAGE BOUNDARIES AND INFILL DEVELOPMENT	<p>These are inconsistent application of the settlement boundary guidelines through: a) the omission of the Howbery Business Park and adjoining employment area from the settlement boundary, notwithstanding the confirmation of the areas' suitability through the draft allocation in policy CRP3 for further employment development. These industrial areas clearly form part of the wider character of the settlement and are integral parts of the community; and b) The inclusion of an area south of Crowmarsh Gifford around Newnham Manor within its provisional boundaries. This area does not have a planning permission for residential development. Although there is a resolution to grant with respect of application P16/S3852/FUL for 100 dwellings, the application was put to committee on 16th January 2018. This is over 2 ½ years ago and planning permission has still not been granted due to outstanding highways issues. It is likely that due to the significant period of time which has passed it will need to be returned to committee and given that SODC can demonstrate a five year land supply, it is unlikely to be approved. Therefore, this area does not accord with the guidance that the Neighbourhood Planning Group contend that they are following since there is no approval for residential development. Furthermore, since this location is predominantly within the AONB, this is a further justification for its omission from the provisional settlement boundaries. It is not for NPs to be making strategic decision about development in the AONB (NPPF paragraph 172). Taking account of the above comments, it is clear that the proposed boundaries associated with CRP1 and are arbitrary with no evidence on how they have been</p>	<p>a. The Cheshire East methodology to derive settlement boundaries indicates that the removal of the industrial area along Benson Lane remains valid.</p> <p>b. Planning proposal for land at Newnham Manor has a resolution to grant planning permission and as such the site is included within the settlement boundary pending construction work. This site is the community's preferred development site, and it is partly a brownfield site with obvious benefits from redevelopment. The site has thus been retained within the settlement boundary.</p>

		robustly defined. Therefore, it is essential that prior to the submission of the Neighbourhood Plan a further consultation is undertaken which clearly justifies the approach followed and how this has been consistently applied across the Plan area.	
3.	Land east of Benson Lane and west of A4074	The entire parcel of land north of the built area of Crowmarsh Gifford should be allocated for housing as this forms a logical extension eastwards from the built area of Howbery Park and was approved for housing in the 2014 Landscape Capacity Assessment report of the District Council.	The extension of the settlement boundary into greenfield land has no precedent unless it has an approved planning application. No action has thus been taken.
STAKEHOLDER: ARRON TWAMLEY FOR AVANT HOMES			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	We fully support Crowmarsh Parish Council in the preparation of this neighbourhood plan and agree with its key aims and objectives, as well as its specific development management policies. We are pleased to see the neighbourhood plan supports the proposed development at Newnham Manor, which has a resolution to grant under planning application reference P16/S3852/FUL.	Noted.
STAKEHOLDER: THAMES WATER			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...".	Noted.

STAKEHOLDER: AVISON YOUNG FOR NATIONAL GRID			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	Assets and advice	Following a review of the above document we have identified the following National Grid assets as falling within the Neighbourhood area boundary: Electricity 4VY Route - 400Kv two circuit route from Cowley substation in South Oxfordshire to Didcot substation Gas FM07 - Chalgrove to Didcot PS	Noted.
STAKEHOLDER: SCOTTISH & SOUTHERN ELECTRICITY NETWORK			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comment	I can confirm that, at this present time, I have no comments to make.	None.
PARISHIONERS: 1. DENISE HALL, 2. TREVOR COTTON, 3. VALERIE WORRALL			
Ref.	Section/Policy	Comment/recommendation	Action taken
1.	General comments	1. You clearly state the pressures on the village's infrastructure, primary school, GP'S, increase in traffic, traffic issues have been steadily increasing for years and will continue to do so, issues on the A4074 have been continually raised for many years and are still waiting to be addressed. Housing types are clearly needed for our younger generation, consisting of 1, 2 and 3 beds, we have some larger properties that are just not selling so why build more. Smaller properties for those ready to downsize (bungalows) also means those who want a smaller property don't have to leave the village. 2.The three existing housing developments have not resulted in any growth in amenities. 3. Development plans for Crowmarsh Gifford village community need to be integrated and informed by sustainable thought.	Noted.

Howbery Estate was again invited to comment on the Plan during November 2020, having passed over the opportunity during the Reg 14 Consultation. On receipt of a submission version of the Plan, Graham Leeming confirmed that considerably greater than 0.28 ha of land was available for employment use development that may satisfy the constraints laid down in Policy CRP3.

Although SODC Property Department had been consulted during the Reg 14 process regarding Riverside Meadows, Earth Trust, as managers of the Riverside Meadows at Crowmarsh Gifford were also contacted during November. They were sent a draft submission version of the Plan and informed that the Plan intended to designate Riverside Meadows as a Local Green Space according to Policy CRP6. In reply Senior Warden Community Reserves advised:

May I suggest instead of the bank vole (which sadly is not a protected species although being a very important pillar of the food chain for so many other species from Barn Owls to Weasels) you might mention one of the protected bat species that uses the site such as the Daubenton's or Nodule Bat. Other than that I would just like to suggest that there is provision within the CRP6 to ensure that any development within or adjacent to Riverside does not adversely affect the ecological value of the site, perhaps:

The Neighbourhood Plan designates Riverside Meadows as a Local Green Space, as shown on the Policies Map Inset A. Development *only* be permitted in very special circumstances *and where that development does not undermine the management of the site for biodiversity.*

Plan Policy CRP 6 has been amended as suggested and the species changed in the text.