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Robyn Tobutt
Planning Policy Team
South Oxfordshire District Council
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## By Email Only

Dear Robyn,

## CROWMARSH NEIGHBOURHOOD PLAN EXAMINATION – HOWBERY PARK ON BEHALF OF HR WALLINGFORD

Bidwells LLP has been instructed by HR Wallingford to submit representations to South Oxfordshire District Council (SODC) in response to the Crowmarsh Neighbourhood Plan Examination.

We write with reference to Historic England's concerns related to policy CRP3 and the impact of the employment allocation on the heritage assets within Howbery Park. As part of the examination, the examiner issued a clarification note on the matter. In response the Parish Council has commissioned a Heritage Assessment as an addendum to the site assessment.

As representative to HR Wallingford, you have asked us to comment on the Heritage Assessment (Asset Heritage Consulting, April 2021) and require a response by Thursday 13 May.

## **Heritage Assessment Response**

The Heritage Assessment recommends a series of mitigation measures are put in place to enhance the heritage assets at Howbery Park, and this includes the following amendments to policy CRP3 and the Submission Policies Map: Inset A October 2020:

- Turning the rectangle footprint on the Policies Map through 90 degrees
- Restricting height of the proposed buildings within the rectangle footprint to two storeys
- Reinstating tree line planting along the allocation's western boundary



In order to provide a more fully considered response we would first like to see the Policies Map updated with the rectangle footprint turned through 90 degrees. In the meantime, we consider the proposed amendments to policy CRP3 can be accommodated within the vision document for the Park (the vision document is after all at an early stage and is subject to pre-app discussions), however this is on the proviso there will need to be sufficient flexibility in the policy to allow other environmental and technical considerations, as well as viability/business needs, to be fully considered in the context of preserving/enhancing the heritage asset.

We note and are encouraged that Historic England supports the recommendations made within the Heritage Assessment in support of the rectangle footprint (as per their letter dated 29 April 2021).

## **Other Matters**

Notwithstanding our comments above, in our letter dated 9 March 2021 (to Crowmarsh Neighbourhood Plan Submission Version) we raised a number of concerns regarding policy CRP3 as well as the Policies Map.

In summary, we emphasised that whilst we support the aims of policy CRP3 we consider the total quantum of employment land at 0.28ha is inadequate to meet HR Wallingford's future needs. It will also preclude the comprehensive redevelopment of Howbery Park in line with the emerging vision document.

We also stated that unless this figure is increased to include the whole of Howbery Park there is a real risk that HR Wallingford's future vision for the Park will not be fully realised and that piecemeal development will occur. We consider piecemeal development would be detriment to Howbery Park's long-term future, as well as its historic and landscape setting.

Since the submission of representations in March, we have submitted a pre-application request to South Oxfordshire's Development Management Team (this also includes the draft Vision Document for Howbery Park). The pre-app will discuss the comprehensive redevelopment of Howbery Park (over the next decade) within the context of the development plan and site constraints.

If you would like to discuss the content of this letter in further detail we are very happy to arrange a virtual meeting. In the meantime, if you have further questions please do not hesitate to get in contact.

Kind regards

Arron Twamley
Consultant Planner

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CC HR Wallingford