

Kidmore End Neighbourhood Plan

Facilitation Report

Kidmore End Parish Council

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Abbreviations used in the report

Abbreviation

AONB	Area of Outstanding Natural Beauty
KEPC	Kidmore End Parish Council
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SHELAA	Strategic Housing and Economic Land Availability Assessment
SODC	South Oxfordshire District Council
SOCS	South Oxfordshire Core Strategy
SOLP	South Oxfordshire Local Plan

1. Executive Summary

Introduction and Background

AECOM was commissioned to undertake a neighbourhood plan Site Assessment for Kidmore End Parish Council (KEPC) as part of the Ministry for Housing, Communities and Local Government (MHCLG) Neighbourhood Plan programme. The work was agreed with KEPC and MHCLG in July 2018.

The Neighbourhood Plan area is covered by the adopted South Oxfordshire Core Strategy (SOCS) . The Neighbourhood Plan must be in conformity with the strategic policies of the SOCS but should also have regard to the emerging South Oxfordshire Local Plan (SOLP) which proposes future Local Plan policies. It is the intention of the Parish Council that the neighbourhood plan will include allocations for housing development, which will contribute to the housing allocations of the emerging SOLP.

The requirement for facilitation

As the Site Assessment progressed, it became clear that the Parish Council would benefit from a greater understanding of how the Neighbourhood Plan and its Site Assessment should fit with the adopted and emerging SODC Development Plans.

As such, it was concluded by AECOM, with the agreement of Locality and MHCLG, that it would benefit KEPC if additional support were made available to facilitate discussions between the Parish Council and SODC before continuing with the Site Assessment.

This helps ensure that that the Neighbourhood Planning site selection process is robust and transparent and will meet the Basic Conditions of neighbourhood planning considered by the Independent Examiner, as well as any potential challenges by developers, site promoters and/or other interested parties.

This Facilitation Report should be read alongside the Site Assessment report to which it refers, as there is necessarily a degree of cross-reference between them.

Having reviewed all relevant data required to complete the Site Allocations exercise, AECOM considered that clarification was required from SODC on the following key issues:

- Approach to determining Kidmore End's neighbourhood plan housing requirement;
- SODC's Strategic Housing and Economic Land Availability Assessment (SHELAA) and its impact on the neighbourhood plan site assessment;
- SODC's interpretation of the Local Plan sustainable settlement hierarchy as applied to the Kidmore End context;
- The status of the adopted SODC Local Plan versus the emerging Local Plan for the purposes of neighbourhood planning;
- How existing and future dwelling completions within the Plan period will be counted; and
- Approach to and definition of infill as defined in Local Plan policy for the purposes of neighbourhood planning site allocations.

In order to get clarification from SODC on the issues listed above, a meeting was arranged between AECOM, KEPC and SODC. The meeting was considered helpful and productive by both Kidmore End Parish Council and AECOM.

Meeting outputs and summary of conclusions

The detailed advice offered by SODC in respect of each of the issues highlighted in Chapter 3 above is set out below. It is assumed for the purposes of the facilitation and site assessment processes that where advice given by SODC at the facilitation meeting contradicts or has the potential to contradict previous SODC advice, it supersedes that earlier advice.

The full minutes of the facilitation meeting were taken by the Parish Council, subsequently agreed by AECOM, SODC and the Parish Council as an accurate representation of the SODC position, and appear in Appendix A.

In summary, the facilitation process provided the following information for AECOM and KEPC. This information will be carried forward into the final Kidmore End neighbourhood plan site assessment report.

- Kidmore End's neighbourhood plan housing requirement 2011-2033, based on Census 2011 data, is 26 dwellings;
- It is accepted that the South Oxfordshire SHELAA needs review, and a new version will be published early in 2019; in the meantime it is not a problem if the neighbourhood plan site assessment conclusions on SHELAA sites differ from the current version of the SHELAA;
- The neighbourhood plan is free to allocate sites anywhere in the parish (i.e. not just at Kidmore End village) to the extent this is consistent with other local and national policy considerations;
- This freedom to allocate sites anywhere in the parish can be considered to over-ride the Local Plan sustainable settlement hierarchy for the purposes of neighbourhood planning, as long as sites are allocated in line with other relevant local and national policy considerations;
- The neighbourhood plan and its evidence base should have appropriate regard to both adopted and emerging Local Plan policy; however, in practice, the difference between the two in terms of the settlement hierarchy has been superseded in any case by the freedom to allocate sites anywhere in the parish;
- All dwellings completed or committed in the parish between 2011 and 2033 count towards the neighbourhood plan housing requirement of 26 dwellings, whether or not they are on allocated sites; this means that the parish has already met its minimum neighbourhood plan housing requirement and does not need to allocate sites in the neighbourhood plan; however, there are advantages in doing so; and
- The Local Plan development restrictions in terms of infill and site size/capacity that apply to certain settlements in the parish do not apply for the purposes of neighbourhood plan site allocations, meaning that the Neighbourhood Plan is free to allocate sites at Gallowstree Common, Kidmore End and Tokers Green that may not be infill (i.e. may be settlement extensions) and/or may exceed the Local Plan site size/capacity restrictions.

2. Introduction

Background

- 2.1 AECOM was commissioned to undertake a neighbourhood plan Site Assessment for Kidmore End Parish Council (KEPC) as part of the Ministry for Housing, Communities and Local Government (MHCLG) Neighbourhood Plan programme. The work was agreed with KEPC and MHCLG in July 2018.
- 2.2 Kidmore End is a parish in South Oxfordshire District, lying north of Reading in Berkshire. While the parish is centred on (and named after) the village of Kidmore End, there are a number of other smaller outlying settlements, namely Cane End, Chalkhouse Green, Gallowstree Common and Tokers Green.
- 2.3 Almost all of the parish, excluding the southernmost part bordering the Reading suburb of Caversham, is within the Chilterns Area of Outstanding Natural Beauty (AONB), a designation which brings with it significant restrictions on development within it or within its setting (more details below). The village of Kidmore End and the smaller settlements of Cane End and Gallowstree Common lie within the AONB; the settlements of Chalkhouse Green and Tokers Green, as well as the countryside at the edge of Reading/Caversham, lie just outside it, but within its setting to varying extents.
- 2.4 The spatially complex nature of the parish is reflected in the boundaries of the neighbourhood plan area, which covers most, though not all, of the parish. The boundary was deliberately drawn to exclude land within the eastern part of the parish which may in future form a south-westward extension of Sonning Common, a large village just outside the parish boundary. The parish boundary and neighbourhood plan boundary are illustrated in Figure 1 below.
- 2.5 The Neighbourhood Plan area is covered by the adopted South Oxfordshire Core Strategy (SOCS)¹. The Neighbourhood Plan must be in conformity with the strategic policies of the SOCS but should also have regard to the emerging South Oxfordshire Local Plan (SOLP)² which proposes future Local Plan policies. It is the intention of the Parish Council that the neighbourhood plan will include allocations for housing development, which will contribute to the housing allocations of the emerging SOLP.

¹ <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/core-strategy/adopted-core-strategy>

² <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/emerging-local-plan>

3. The requirement for facilitation

Introduction

- 3.1 As the Site Assessment progressed, it became clear that the Parish Council would benefit from a greater understanding of how the Neighbourhood Plan and its Site Assessment should fit with the adopted and emerging SODC Development Plans.
- 3.2 As such, it was concluded by AECOM, with the agreement of Locality and MHCLG, that it would benefit KEPC if additional support were made available to facilitate discussions between the Parish Council and SODC before continuing with the Site Assessment.
- 3.3 This helps ensure that that the Neighbourhood Planning site selection process is robust and transparent and will meet the Basic Conditions of neighbourhood planning considered by the Independent Examiner, as well as any potential challenges by developers, site promoters and/or other interested parties.
- 3.4 For the avoidance of doubt, therefore, the scope of this Facilitation stage is limited to the securing of clarification from SODC on the most appropriate line to take on a number of issues pertinent not only to the completion of the Site Assessment, but also to the final process of site selection and allocation, and thus, indirectly, for the successful adoption of Kidmore End Neighbourhood Plan as a whole.
- 3.5 This Facilitation Report should be read alongside the Site Assessment report to which it refers, as there is necessarily a degree of cross-reference between them.

Specific clarification requirements

- 3.6 Having reviewed all relevant data required to complete the Site Allocations exercise, AECOM considered that clarification was required from SODC on the following key issues, each of which will be discussed in more detail in Chapter 3 below:
 - Approach to determining Kidmore End's neighbourhood plan housing requirement;
 - SODC's Strategic Housing and Economic Land Availability Assessment (SHELAA) and its impact on the neighbourhood plan site assessment;
 - SODC's interpretation of the Local Plan sustainable settlement hierarchy as applied to the Kidmore End context;
 - The status of the adopted SODC Local Plan versus the emerging Local Plan for the purposes of neighbourhood planning;
 - How existing and future dwelling completions within the Plan period will be counted; and
 - Approach to and definition of infill as defined in Local Plan policy for the purposes of neighbourhood planning site allocations.
- 3.7 The final chapter of this report sets out the topics covered in a meeting between the Parish Council and SODC, facilitated by AECOM, and held on 3rd October 2018.

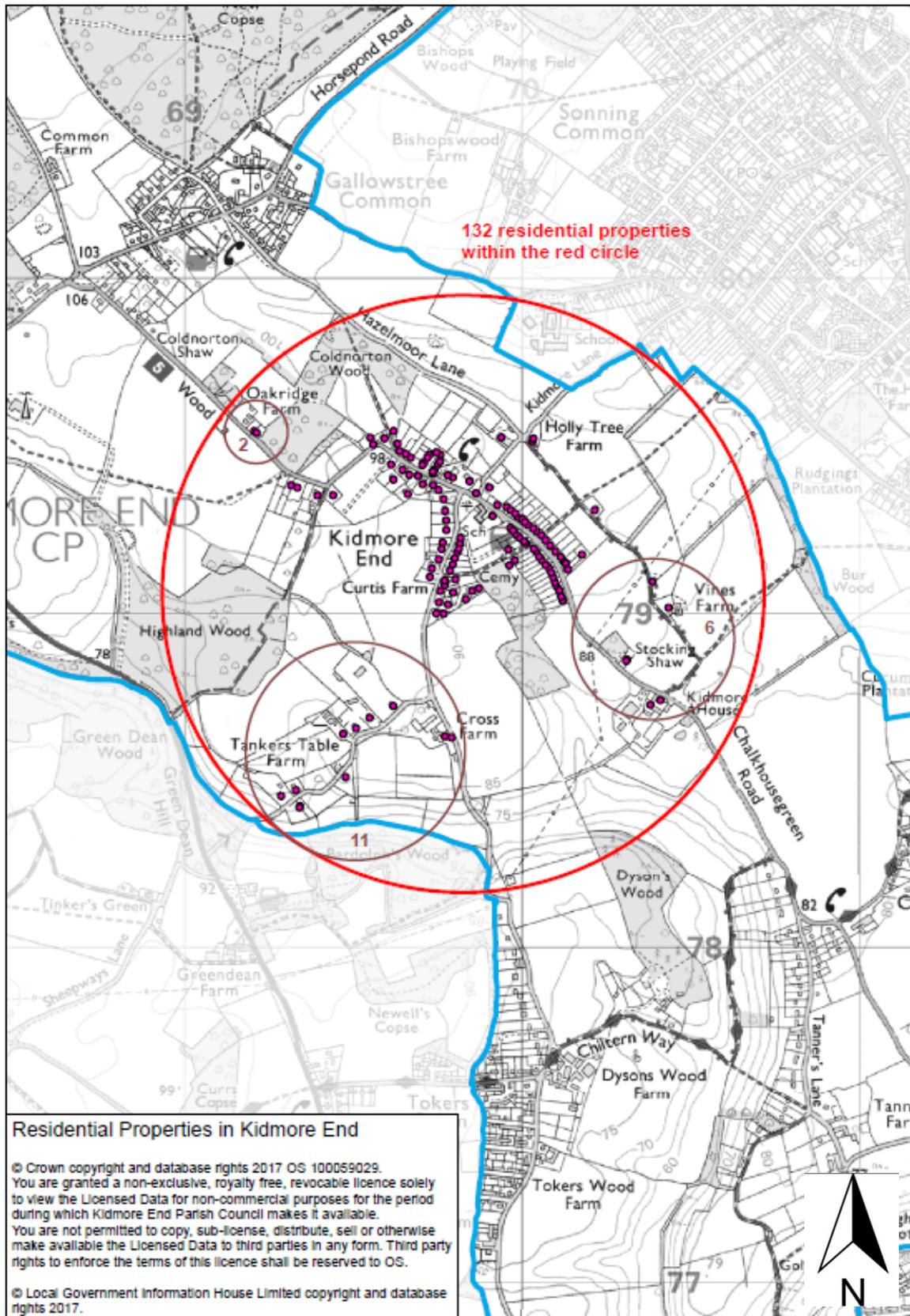
4. The key issues

- 4.1 This chapter provides further detail on the six key issues introduced in paragraph 2.6 above where policy clarification is required from SODC in order to complete the neighbourhood plan site assessment. For each, it sets out detail on the nature of the problem and its specific or potential impact on the neighbourhood plan. Sections 5 then details SODC's responses to the issues raised in this chapter.

Neighbourhood plan housing requirement

- 4.2 SODC advised both verbally and in the emerging SOLP that the housing requirement in the neighbourhood plan should be delivered through housing allocations. It initially advised that those allocations should be focussed on Kidmore End village only rather than any of the other settlements within or adjoining the parish.
- 4.3 The emerging Local Plan (Policy H8 and paragraph 5.37) states that the village should allocate land sufficient to provide a minimum of 5% of the number of dwellings at Kidmore End as shown by the 2011 Census.
- 4.4 However, the Parish Council advise that SODC did not have regard to the Census when originally advising them how to calculate their housing requirement. Instead, they drafted a circle of arbitrary radius centred on Kidmore End Village (see Figure 1) and advised the Parish Council to count the number of dwellings within this circle, which is 132 (contrasting with the 516 across the parish stated by the Census).
- 4.5 The 'circle' approach does not appear logical to AECOM and the recommendation that it should be used was queried with SODC, specifically because:
- It appears to go against the emerging Local Plan advice to use Census 2011 data, i.e. the most accurate, Government-derived definition of number of dwellings in Kidmore End at the start of the neighbourhood plan period;
 - It is not replicable or able to be universally agreed, i.e. relevant stakeholders could easily argue for the circle radius to be larger or smaller depending on their interests; and
 - It is not clear when the base mapping dates from and therefore the dwellings count may be an over- or under-representation of the actual number of dwellings in Kidmore End village at Census 2011.

Figure 1: Method originally recommended to KEPC by SODC for determining Neighbourhood Plan housing requirement



Source: South Oxfordshire District Council, Kidmore End Parish Council

South Oxfordshire SHELAA

- 4.6 Any Site Assessment for a neighbourhood plan should have appropriate regard to previous assessments of site suitability, availability and achievability, building on rather than replicating their conclusions as appropriate. In some cases, there may be a need to challenge the findings of those previous assessments.
- 4.7 The South Oxfordshire SHELAA (October 2017) unfortunately contains errors and omissions that mean its conclusions are in some cases inconsistent with both national and local planning policy. Although these errors and omissions were highlighted to SODC, the SHELAA nevertheless remains at the time of writing unchanged on the Council website.
- 4.8 In some cases, the SHELAA conclusions for sites within Kidmore End are considered fully in line with local and national policy. These are sites 181 (Cemetery, Kidmore End), 894 (Land east of Kidmore End Road, Emmer Green), and 970 (Land south of A4074, Woodcote).
- 4.9 The Site Assessment report covers in greater depth the key problems with the current draft of the South Oxfordshire SHELAA for the purposes of neighbourhood planning site assessment at Kidmore End. However, Table 1 below provides an 'at-a-glance' summary. The sites in Table 1 are illustrated in SHELAA maps 49, 51 and 55, available online.³

Table 1: SHELAA sites in Kidmore End where assessment conclusions are considered inaccurate

SHELAA Site Reference	Site Address	Site area (ha)	SHELAA finding	AECOM observations
69	Land at Dysons Farm, Dysons Wood	1.49	Suitable, available and achievable for housing	SHELAA, which states that it is a 'policy on' study, is inaccurate. Adopted Core Strategy policy CSR1 on settlement hierarchy states that development at Tokers Green should be infill only of 2-3 dwellings on sites of 0.1 hectares or less; emerging Local Plan policy carries CSR1 forward.
80	Land at Horsepond Rd, Gallowstree Common	3.03	Not suitable or achievable for housing	Though SHELAA finding is considered accurate, it fails to mention that development would also be contrary to national policy on major development within AONBs; this latter point should be referenced in the SHELAA.
834	Land north of Gravel Hill, Emmer Green	2.02	Suitable, available and achievable for housing	A planning application (P18/S1522/O) ⁴ has just been refused at the time of writing, with SODC and Reading both agreeing the site is unsuitable for development. Based on evidence from a site visit, AECOM considers this assessment to be accurate. As such, the SHELAA should be updated to reflect this lack of suitability and to set out the reasons

³http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=FolderView&ID=880598954&CODE=B1D44A806056D4FEAF9A678AC2F68998&NAME=SHELAA&REF=SHELAA&REFERER_URL_IN=&SOVA_IN=SOUTH#exactline

⁴ For full details, see <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P18/S1522/O>

SHELAA Site Reference	Site Address	Site area (ha)	SHELAA finding	AECOM observations
1017	Land east of Mapledurham Golf Course, Chazey Heath	1.80	Suitable, available and achievable for housing ⁵	Adopted Core Strategy policy CSR1 (development at Tokers Green should be infill only of 2-3 dwellings on sites of 0.1 hectares or less) supersedes SHELAA findings; this scale of housing growth is not appropriate for Tokers Green and therefore the site is not suitable. Because the site would connect Tokers Green to the edge of Reading/Caversham, the site is additionally unsuitable on national policy requiring sympathy to local character and history (i.e. the character and history of Tokers Green as a free-standing settlement), and maintaining a sense of place (for the same reason). Finally, since SHELAA publication, a planning application (P17/S2021/FUL) ⁶ has been refused by SODC on the grounds that the site is not suitable for development. As such, the SHELAA assessment of suitability is incorrect.
1269	Land east of Tokers Green Lane	6.60	Suitable, available and achievable for housing	On its western side, the site would contribute to perceived (if not actual) coalescence between Reading/Caversham and Tokers Green, which would be contrary to national policy; the west of the site comprises best and most valuable agricultural land (Grade 2); national policy seeks to minimise its loss if alternative sites are available; the east of the site would not be suitable for development in landscape terms as it comprises a dry chalk valley, protected by both South Oxfordshire and adjacent Reading policy; Reading policy also resists impacts on an adjacent public open space; the whole site has the potential (subject to detailed assessment of landscape and visual impact) to lie within the setting of an AONB; the site is distant from local services and facilities, and its development would likely encourage car travel rather than pedestrian or cycle movements; development of the site in part or in whole would need significant upgrade of Tokers Green Lane which would itself have an impact on the setting of the AONB. On balance, therefore, the site is not suitable.

4.10 Within the Site Assessment report, AECOM has set out, in its capacity as an independent planning specialist, alternative conclusions on SHELAA sites that are considered to be more in line with national and local policy.

4.11 It should also be noted that, although AECOM has not tested the SHELAA conclusions across the whole of South Oxfordshire, similar issues of consistency and accuracy

⁵ Despite the site being considered suitable, available and achievable for development, the SHELAA notes that the conclusion is not in accordance with the spatial strategy but that this recognises the site's proximity to the built area of Reading. This qualification does not change AECOM's assessment that the SHELAA is incorrect in considering the site suitable for housing.

⁶ For full details, see <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P17/S2021/FUL>. The refusal is the subject of an appeal at the time of writing; for details see <http://www.southoxon.gov.uk/ccm/planning/ApplicationDetails.jsp?REF=P17/S2021/FUL>.

have been noted for sites at Sonning Common, the neighbouring parish to Kidmore End, and, as such, the current version of the SHELAA may be inaccurate in the terms noted across the wider District.

Sustainable settlement hierarchy

- 4.12 SODC initially advised KEPC that the neighbourhood plan should look to allocate sites at Kidmore End village only, given that it is the largest and thus the most sustainable settlement in the parish. This is reflected in the fact that it is the only village in the parish classed as a Smaller Village in the emerging Local Plan, with other settlements classed as 'Other Villages'.
- 4.13 However, in AECOM's judgement, this approach does not have sufficient regard to the fact that land within the neighbourhood plan area adjoins the Reading/Caversham settlement boundary and therefore has the potential, if developed in accordance with relevant policy, to form one or more urban extensions⁷ to Reading/Caversham.
- 4.14 AECOM raises this issue not because it considers that neighbourhood plan site allocations should or could be directed to this location- rather it does so to guard against the possibility that landowners or developers promoting land on the edge of Reading/Caversham make a robust case in terms of national policy that developing land in this location would in principle be a more sustainable option than developing land at Kidmore End. This does not appear to have been considered by SODC at the time they advised the Parish Council to focus only on allocating land at Kidmore End village.
- 4.15 In other words, there has been insufficient clarification at the time of writing on the part of SODC on the status of the sites at the edge of Reading/Caversham. Specifically, this refers to SHELAA sites 71, 834, 1017, 1056 and 1269 and to Call for Sites site CFS1. The issue has been exacerbated by the fact that the SHELAA continues to state that sites 834, 1017 and 1269 are suitable for housing development, despite the subsequent recent refusals of planning permission on sites 834⁸ and 1017⁹ on the grounds of a lack of suitability for housing development.

Status of adopted versus emerging Local Plan

- 4.16 Ordinarily, neighbourhood plans should look to align themselves with the most recently adopted Local Plan. However, because the adopted Local Plan was not drafted in the expectation that neighbourhood plan allocations would contribute towards the overall housing target, AECOM understands that South Oxfordshire have advised the Parish Council to have regard only to the emerging Local Plan.
- 4.17 If this is the case, it is problematic because the emerging Plan policy has not yet been tested at Examination. At Examination, relevant emerging policies could be modified significantly or even withdrawn completely.
- 4.18 As such, AECOM would advise that it is best for the Neighbourhood Plan and its evidence base to seek alignment with the adopted plan as a starting point, but with

⁷ While there is no legal or government definition of what does or does not constitute an urban extension, the Planning Portal glossary (available at https://www.planningportal.co.uk/directory_record/565/urban_extension) defines an urban extension as 'the planned expansion of a city or town [that] can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities'. For the purposes of this report, sites have been defined as potential urban extensions if they consist of open land within Kidmore End parish directly adjoining the Reading/Caversham urban area settlement boundary (itself contiguous with the southern boundary of the parish) on one or more sides.

⁸ Decision notice available at

<http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P18/S1522/O>

⁹ Decision notice available at

<http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P17/S2021/FUL>. The refusal is the subject of an appeal at the time of writing: for details see <http://www.southoxon.gov.uk/ccm/planning/ApplicationDetails.jsp?REF=P17/S2021/FUL>.

reference throughout as appropriate to the requirements of the emerging plan where they may differ. At a later stage, if the emerging plan is adopted before the neighbourhood plan is adopted, the text can be edited as appropriate so that it is in conformity with the spatial strategy and policies of that plan.

- 4.19 The single most important difference between the adopted and emerging Local Plans for the purposes of neighbourhood planning at Kidmore End is the status of Gallowstree Common. It is designated as a Smaller Village in the adopted Local Plan but as an Other Village in the emerging Local Plan. The net effect is that in the adopted Local Plan, infill on sites of up to 0.2 hectares will be permitted, equivalent to 5-6 homes, but in the emerging Local Plan, infill only on sites of up to 0.1 hectares will be permitted, equivalent to 2-3 homes.
- 4.20 As such, clarification on the approach to take for sites submitted to the SHELAA and the Call for Sites at Gallowstree Common would be helpful. For as long as SODC is advising the Parish Council only to allocate sites at Kidmore End, there is a concern that until and unless the emerging plan is adopted, site promoters at Gallowstree Common may have as strong of a case for their sites to be allocated as those at Kidmore End village, given that they lie within the Plan area and that at present Gallowstree Common is at the same level as Kidmore End in the settlement hierarchy.
- 4.21 Even if it can be confirmed by SODC that sites at Gallowstree Common are not to be allocated on the basis of adopted local and national policy, it will be important to ensure that the site assessment gives accurate reasons, based firmly on that policy, for rejecting them (and ideally also stating any policy-compliant development options remaining open), otherwise there is the risk that developers could successfully challenge the site allocation process.

Counting dwelling completions in the Plan period

- 4.22 AECOM understands that SODC have advised the Parish Council to align the neighbourhood planning period with that of the emerging Local Plan, meaning that both plans started their planning period in 2011.
- 4.23 Additionally, it is understood (see text above) that the dwelling requirement of the neighbourhood plan should be, as a minimum, an additional 5% of the number of dwellings within Kidmore End parish as of Census 2011.
- 4.24 This means that any dwellings completed or committed (i.e. given planning permission but not yet completed) within the parish between 2011 and the time of this assessment should in theory count towards this target.
- 4.25 This issue also has the potential to be affected by whether or not completions in the neighbourhood plan area outside Kidmore End village count towards the neighbourhood plan dwelling target. In theory, they should, because they are within the Plan area- if they do not count, then there would be a strong argument for the Plan area to cover only Kidmore End village. However, a reading of the emerging Local Plan suggests this is not the interpretation favoured by South Oxfordshire- and there is a concern that, as things stand, the emerging Plan could be challenged by the promoters of sites outside Kidmore End village.
- 4.26 If it is accepted that dwelling completions across the whole of the Plan area, including but not limited to Kidmore End village itself, count towards the neighbourhood plan dwelling requirement, then it would appear that no sites need to be allocated.
- 4.27 This provisional conclusion is reached as follows:
- There were 516 dwellings across the parish in the 2011 Census
 - 5% of this figure comprises a housing requirement of 26 dwellings

- 31 dwellings have been completed or committed within the parish since 2011, based on figures provided by the Parish Council¹⁰

Therefore, there is no outstanding dwelling requirement during the Plan period.

- 4.28 It will be important to get clarification of SODC's approach to determining a dwelling target at Kidmore End and ensuring that this approach is defensible in the face of any developer challenge. As an incidental point, it is also noted that the geographical spread of commitments and completions across the parish between 2011 and 2018 appears to be significantly misaligned with the adopted Local Plan settlement hierarchy.

Definition of infill in Local Plan policy

- 4.29 As noted above, the settlement hierarchy in both the adopted and emerging Local Plans has implications for the type of development that is expected within each settlement.¹¹ The 'smaller villages' and 'other villages' are assessed as suitable for infill on varying scales. Infill is defined in both Plans as 'the filling of a small gap in an otherwise built-up frontage or on other sites within settlements where the site is closely surrounded by buildings'.
- 4.30 While this is a useful definition in theory, the SHELAA did not take it into account (i.e. sites that were not infill but in villages defined as suitable for infill only were still accepted as suitable for development).
- 4.31 As such, it remains unclear which SHELAA sites would or would not be suitable for development were this definition to be rigorously applied.
- 4.32 The fact that both the adopted and emerging Local Plans provide for infill development in multiple settlements across the parish (i.e. not just in Kidmore End village) makes it even more difficult to justify the SODC advice to focus allocations at Kidmore End village only.
- 4.33 It is also noted that, in practice, only a minority of the sites submitted as part of the Neighbourhood Plan Call for Sites or the SHELAA appear to satisfy (or, with a reduction in site size, have the potential to satisfy) this definition of infill, making it all the more important to understand if the Parish Council is permitted to allocate sites forming extensions to settlements that do not satisfy the above definition of infill development.¹²
- 4.34 As such, clarification from SODC on the definition of infill development for the purposes of neighbourhood plan site allocations was required, as this is not clear from the wording of the emerging Local Plan.

¹⁰ As of October 2018.

¹¹ Refer to the Kidmore End Site Assessment Report (AECOM, November 2018) for full details of the settlement hierarchy in the adopted and emerging Local Plans.

¹² If greenfield sites forming extensions to Kidmore End village rather than infill were permitted as neighbourhood plan site allocations, national policy on development in AONBs (NPPF paragraph 55 and the Town and Country Planning [Development Management Procedure] [England] Order 2015) suggests that they would not be able to exceed 0.5 hectares in size. However, if they are permitted to form neighbourhood plan site allocations, it is noted that, without additional local policy restriction, they would exceed the maximum scale of infill development permitted at Kidmore End (0.2 hectares), thus creating a perverse incentive whereby fewer constraints apply to greenfield development than brownfield development.

5. Meeting with the District Council

Preparation for the meeting

- 5.1 South Oxfordshire District Council agreed to meet with Kidmore End Parish Council and AECOM on Wednesday 3rd October 2018 at Gallowstree Common for a facilitation meeting.
- 5.2 As previously explained, the key objective of the facilitation meeting was to gain clarification and understanding on the part of AECOM and the Parish Council as to SODC's position, thinking and advice on the issues highlighted in Chapter 3. This clarification and understanding could then be applied to the Site Options Assessment, enabling it to be completed, and at the same time also completing the facilitation process.
- 5.3 The agenda for the facilitation meeting is presented in Figure 2 overleaf. Note that agenda item 7 (Relationship between neighbourhood plan allocations and SODC housing requirement) was added at the request of the Parish Council and, while relevant to neighbourhood planning and important in its own right, is outside the scope of this facilitation package as it does not relate directly to the ability of the site assessment exercise to be completed. As such, it is not discussed further in this report.

The meeting itself

- 5.4 The meeting, which took place at the time and place agreed, was considered helpful and productive by both Kidmore End Parish Council and AECOM. The SODC officer attending alongside Ricardo Rios was Kirpa Patel of the Local Plan team, who was present to advise on the approach taken by the SHELAA.
- 5.5 The detailed advice offered by SODC in respect of each of the issues highlighted in Chapter 3 above is set out in Chapter 6: Conclusions, alongside commentary, where necessary, on the implications of this advice. It is assumed for the purposes of the facilitation and site assessment processes that where advice given by SODC at the facilitation meeting contradicts or has the potential to contradict previous SODC advice, it supersedes that earlier advice.
- 5.6 The full minutes of the facilitation meeting were taken by the Parish Council, subsequently agreed by AECOM, SODC and the Parish Council as an accurate representation of the SODC position, and appear in Appendix A.

Figure 2: Final agenda for facilitation meeting attended by South Oxfordshire District Council, Kidmore End Parish Council and AECOM, Gallowstree Common, 3rd October 2018

AECOM Meeting Agenda

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Subject	Kidmore End Neighbourhood Plan
Name	Facilitation Meeting with South Oxfordshire District Council
Date	3 rd October 2018
Time	2.30pm
Location	Pavilion, Kidmore End Cricket Club, Gallowstree Common, Oxfordshire, RG4 9BU
Attendees	Ricardo Rios, South Oxfordshire District Council Local Plan Specialist, South Oxfordshire District Council Jesse Honey, AECOM Lyn Stewart-Ashby, Kidmore End Parish Council Bettina Kirkham, Kidmore End Parish Council Ashley Ford, Kidmore End Parish Council Sue Biggs, Kidmore End Parish Council
Prepared	1 st October 2018
Prepared by	Jesse Honey

1	Welcome and introductions
2	SHELAA and HELAA -Approach to suitability, availability and achievability -Approach to AONB as planning constraint -Other sites (i.e. not Local Plan Strategic Sites) on the edge of Reading -Approach to settlement hierarchy
3	Settlement hierarchy -Overall approach having regard to national planning policy -Edge of Reading, Sonning Common, Kidmore End, Gallowstree Common and smaller parish settlements (Cane End, Chalkhouse Green, Tokers Green)
4	Status of adopted versus emerging plan for the purposes of neighbourhood planning -Implications for Gallowstree Common sites
5	Dwelling target -Start of neighbourhood plan period -Geographic parameters of target (NP area, not just Kidmore End village) -number of dwellings completed within NP area since start date -additional dwellings committed but not completed -outstanding number of dwellings
6	Infill versus neighbourhood plan site allocations -Difference, if any, between infill and potential neighbourhood plan allocations -If different, potential implications in terms of promoting greenfield over brownfield
7	Relationship between neighbourhood plan allocations and SODC housing supply (3 years or 5 years)
8	Any other business

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6. Conclusions

Outputs of the meeting with SODC

6.1 This chapter sets out in detail and then as a final summary the outputs of the facilitation meeting with South Oxfordshire District Council. The issues are addressed in the same order as they were introduced in Chapter 3 above.

Neighbourhood plan housing requirement

6.2 At the facilitation meeting, SODC offered clarification on the neighbourhood plan housing requirement in the following terms:

- The emerging SOLP requirement (Policy H8) for areas with neighbourhood plans to allocate sites for a minimum of a 5% increase in dwelling numbers above those recorded in the 2011 Census applies to the number of dwellings across the plan area rather than in any individual settlement within it, and thus in the case of Kidmore End, this means 5% of the 516 dwellings recorded as being within the parish at the 2011 Census (i.e. 26 dwellings).
 - The previously advised approach of calculating existing dwelling numbers by counting houses within a circle centred on Kidmore End village was incorrect and can now be disregarded.
- 6.3 AECOM and KEPC welcome this helpful clarification, but would note that it may be useful if the next iteration of the SOLP states that the minimum 5% increase in dwelling numbers from the 2011 Census refers to the entire parish rather than any single settlement within it, for the avoidance of ambiguity or doubt.
- 6.4 The superseding of the approach that counted dwellings within a circle centred on Kidmore End village is particularly welcomed, as all parties now agree this is incorrect, it having no relationship with the Census figures.
- 6.5 As such, the Site Assessment is now able to state that Kidmore End's minimum housing requirement for the purposes of the neighbourhood plan is 26 dwellings. This new approach also has implications for how to count dwelling completions in the Plan period (see below).

South Oxfordshire SHELAA

- 6.6 At the facilitation meeting, SODC accepted that the SHELAA as it stands needed updating, but resisted suggestions that it would be in the interests of all stakeholders that the current version should be removed from the Council website. SODC advise that an updated SHELAA, which will be consistent with local and national policy, will be published alongside the consultation version of the SOLP in early 2019.
- 6.7 Nevertheless, the fact that SODC are aware that the SHELAA as it stands does not always provide accurate or consistent information is welcomed. This justifies AECOM's approach of checking SHELAA site conclusions in the neighbourhood plan site assessment in a way that is:
- fully aligned with local and national policy;
 - consistent with the accompanying assessment of non-SHELAA sites; and
 - able to take account of developments since publication of the SHELAA, for example planning application refusals.

- 6.8 At the meeting, SODC officers asked for, and AECOM subsequently provided them with, a copy of Table 1 of this report, which sets out in detail AECOM's observations on each SHELAA site within the parish where SODC conclusions are considered inaccurate, and why this observation has been made.
- 6.9 It is hoped that Table 1 now being in SODC's possession will help ensure that the Council's SHELAA review in early 2019 aligns its conclusions on sites at Kidmore End to a far greater extent with local and national policy.

Sustainable settlement hierarchy

- 6.10 At the meeting, SODC advised that the neighbourhood plan site assessment should consider for allocation sites across Kidmore End parish irrespective of their location.¹³
- 6.11 While AECOM welcomes this advice, and considers that it is the only way to ensure a robust and defensible assessment, it is noted that this contradicts the Council's previous advice that the Plan needed only to allocate sites at Kidmore End village, as advised by KEPC.
- 6.12 The approach of considering sites with a view to allocation across Kidmore End parish irrespective of location will ensure that developers promoting sites on the edge of Reading/Caversham are not able to challenge the site assessment process on the grounds of the sustainable settlement hierarchy suggested by national planning policy.
- 6.13 As such, AECOM confirms that the site assessment report will assess all sites across the parish, irrespective of their location, in terms of their potential for allocation. This new approach also has implications for how to count dwelling completions in the Plan period (see below).

Status of adopted versus emerging Local Plan

- 6.14 SODC's advice on the adopted versus the emerging Local Plan was effectively in agreement with AECOM's assumed approach- namely, that the site assessment report should reference both as appropriate.
- 6.15 In terms of the key difference between the adopted and emerging Local Plans, namely the position of Gallowstree Common in the settlement hierarchy, this discrepancy has effectively been superseded by the Council's other advice in terms of considering sites across the parish on an equal basis (i.e. not focussing allocations on Kidmore End village alone).
- 6.16 This helps simplify matters considerably, because AECOM was concerned that if allocations were to be focussed at Kidmore End village alone, then site promoters at Gallowstree Common could have challenged this on the basis that Gallowstree Common has the same position as Kidmore End village in adopted policy.
- 6.17 This is no longer the case, meaning the site assessment now has the potential to recommend sites across the parish, irrespective of location. This means sites could be allocated at either Gallowstree Common, Kidmore End village, both settlements or neither, depending on how individual sites perform against consistent site-specific criteria.

¹³ At the facilitation meeting, SODC also advised that in future, individual settlements within the parish may be given their own dwelling target. However, this is not certain at the time of writing and has therefore considered outside the scope of this report, as it is not information necessary for the Site Assessment report to be completed.

Counting dwelling completions in the Plan period

- 6.18 SODC confirmed that any dwelling completed or committed (i.e. with planning permission and/or under development, but not yet completed) in the parish since 2011 would count towards Kidmore End neighbourhood plan's housing requirement.
- 6.19 Again, this is a welcome clarification and aligns well with AECOM's and the Parish Council's assumptions on this point. The obvious further implication of this is that any further dwellings permitted across the parish between now and 2033¹⁴ will also count towards the neighbourhood plan housing requirement, whether they comprise sites allocated by the neighbourhood plan or not (where they are not on allocated sites, they can be considered windfall development, irrespective of whether they were completed before or after neighbourhood plan adoption).
- 6.20 As a consequence, SODC was able to confirm to KEPC and AECOM that the 31 dwellings completed or committed in Kidmore End parish since 2011 all count towards the neighbourhood plan housing requirement of a minimum 5% increase on the 2011 Census dwelling count across the parish. This means that the neighbourhood plan is in a position whereby it does not need to include site allocations, if the Parish Council so wish, but will still be in conformity with the emerging Local Plan.
- 6.21 SODC pointed out, and AECOM agrees, that there are nevertheless advantages to making allocations within the neighbourhood plan (i.e. allocating more dwellings than the minimum housing requirement).
- 6.22 The key benefits here would include the ability to demonstrate a positive approach to planning at Examination, which will help the plan meet the Basic Conditions of neighbourhood planning, and the ability to control the location of new development in the parish to a greater extent.¹⁵ As the housing requirement in the emerging SOLP is a minimum, the parish council is free to allocate as many or as few dwellings as it considers appropriate, having regard to relevant national and local planning policy constraints, as well as the neighbourhood plan consultation evidence base.

Definition of infill in Local Plan policy

- 6.23 The final point of clarification provided by SODC at the facilitation meeting was on the definition of infill development, specifically the extent to which, if at all, infill definitions and restrictions as set out in both the adopted and emerging South Oxfordshire local plans apply to sites allocated in a neighbourhood plan.
- 6.24 SODC confirmed that no overlap is intended or expected between the definition of infill within the adopted and emerging local plans on the one hand and neighbourhood plan site allocations on the other. This means that, even for settlements with specific restrictions on small-scale infill development within the Local Plans (within this parish, these restrictions apply to Kidmore End, Gallowstree Common and Tokers Green)¹⁶, neighbourhood planning allocations are free to:
- Over-ride the Local Plan definition of infill (i.e. 'the filling of a small gap in an otherwise built-up frontage or on other sites within settlements where the site is closely surrounded by buildings'), meaning that allocations can form extensions to the built area on the edge of settlements; and
 - Exceed the infill size restrictions, subject to other relevant planning policy constraints and considerations (meaning that neighbourhood plan allocations in Kidmore End and

¹⁴ At the facilitation meeting, SODC also advised that the emerging Plan period may extend into 2034, but as this is not certain at the time of writing, references to 2033 have been retained throughout.

¹⁵ Note that this ability does not guarantee a blanket ability to resist any and all development that is proposed on unallocated sites within the parish once the neighbourhood plan is adopted.

¹⁶ Infill restrictions do not apply to the settlements within the parish that are, for planning purposes, defined as the open countryside (Cane End and Chalkhouse Green).

Gallowstree Common are free to exceed 0.2 hectares or 5-6 dwellings in size, and allocations in Tokers Green are free to exceed 0.1 hectares or 2-3 dwellings in size).¹⁷

Summary of facilitation outputs

6.25 In summary, the facilitation process provided the following information for AECOM and KEPC. This information will be carried forward into the final Kidmore End neighbourhood plan site assessment report.

- Kidmore End's neighbourhood plan housing requirement 2011-2033, based on Census 2011 data, is 26 dwellings;
- It is accepted that the South Oxfordshire SHELAA needs review, and a new version will be published early in 2019; in the meantime it is not a problem if the neighbourhood plan site assessment conclusions on SHELAA sites differ from the current version of the SHELAA;
- The neighbourhood plan is free to allocate sites anywhere in the parish (i.e. not just at Kidmore End village) to the extent this is consistent with other local and national policy considerations;
- This freedom to allocate sites anywhere in the parish can be considered to over-ride the Local Plan sustainable settlement hierarchy for the purposes of neighbourhood planning, as long as sites are allocated in line with other relevant local and national policy considerations;
- The neighbourhood plan and its evidence base should have appropriate regard to both adopted and emerging Local Plan policy; however, in practice, the difference between the two in terms of the settlement hierarchy has been superseded in any case by the freedom to allocate sites anywhere in the parish;
- All dwellings completed or committed in the parish between 2011 and 2033 count towards the neighbourhood plan housing requirement of 26 dwellings, whether or not they are on allocated sites; this means that the parish has already met its minimum neighbourhood plan housing requirement and does not need to allocate sites in the neighbourhood plan; however, there are advantages in doing so; and
- The Local Plan development restrictions in terms of infill and site size/capacity that apply to certain settlements in the parish do not apply for the purposes of neighbourhood plan site allocations, meaning that the Neighbourhood Plan is free to allocate sites at Gallowstree Common, Kidmore End and Tokers Green that may not be infill (i.e. may be settlement extensions) and/or may exceed the Local Plan site size/capacity restrictions.

¹⁷ Again, infill restrictions do not and never have applied to the settlements within the parish that are, for planning purposes, defined as the open countryside (Cane End and Chalkhouse Green).

7. Appendices

Appendix A- Full minutes of 3rd October Facilitation Meeting (provided by Kidmore End Parish Council)

KIDMORE END NEIGHBOURHOOD DEVELOPMENT PLAN – FACILITATION MEETING

MINUTES OF MEETING 2.45pm 3 OCTOBER 2018 WITH SODC

PAVILION, KIDMORE END CRICKET CLUB, GALLOWSTREE COMMON, OXON

Attendees:

Ricardo Rios, South Oxfordshire District Council (RR)
 Keerpa Patel, South Oxfordshire District Council (arrived later during the meeting) (KP)
 Jesse Honey, AECOM (JH)
 Lyn Stewart-Ashby, Kidmore End Parish Council (KNDP)
 Bettina Kirkham, Kidmore End Parish Council (KNDP)
 Ashley Ford, Kidmore End Parish Council (KNDP)
 Sue Biggs, Kidmore End Parish Council (KNDP)

The meeting was called to discuss matters raised by Jesse Honey, Aecom, as part of the Facilitation Package currently being undertaken by Aecom on behalf of Kidmore End Parish in support of the Call for Sites. The meeting was led by JH. As far as possible the minutes follow the Agenda prepared by JH. The notes below are mostly SODC's responses to JH and the KNDP team's questions which are not reported.

JH, LS-A and BK left at 4pm. Meeting ended 5pm.

		Notes	Action
	Item 2: SHELAA and HELAA		
1	KP	SHELAA is high level assessment; SODC are currently revisiting the SHELAA which will be shared when the emerging LP goes to consultation	
2	JH	Requested confirmation that revisited would be 'policy' on and include policy omitted from Oct 2017 SHEELA such as AONB	KP confirmed that the revised SHELAA would be compliant with guidance contained in the revised NPPF and PPG published in 2018
3	KP	Confirmed the SHELAA would be compliant with guidance contained in the revised NPPF and PPG published in 2018	
4	KP	Reference to the scale of development is to be found in the box notes for each site. Notes need to be made clearer (for example for site 69)	JH has subsequently forwarded to KNDP specific concerns on a site-by-site basis- this same table will appear in the Facilitation Report
5	KNDP	Query whether developments of 20 houses would be out of keeping in the AONB (national policy?);	RR to respond

	RR	Still to be considered by SODC	
Item 3: Settlement hierarchy			
6	RR	The urban area of Reading is not relevant to the NDP	
7	RR	KE should look at all sites, regardless of size	KNDP/JH. JH agrees and notes this is a change from the previous SODC advice to look at Kidmore End village only- however, final Site Assessment will take this approach. RR highlighted that the new advice is in response to AECOM's approach to assessing sites.
8	RR	Strategic sites (Reading Golf Course and Palmers Riding School) could be suitable therefore should also be addressed in the NDP; May be at risk if these are not included	JH has added both to Call for Sites report, but notes this is again a change from the previous advice. RR highlighted that the new advice is in response to AECOM's approach to assessing sites.
9	RR	Agreed that we were right in calling for sites throughout the Parish	
10	RR	Proximity to Reading is not the issue; Sites next to Reading would not be in the villages – local plan looks to allocations within the appropriate villages	
11	RR	The emerging LP supports and encourages allocations	
12	RR	Different parishes adopt different approaches. We can apportion development throughout the Parish but must be based on a judgement on capacity of KE and other settlements	
13	RR	Confirmed that any allocation should also be based on: <ul style="list-style-type: none"> • Latest evidence (planning and site specific) • Completions at the time • Level of facilities (highest level at KE) • Results of local consultation Quantify numbers to be delivered to achieve chosen target and then allocate based on settlement hierarchy. Fair to direct to KE; the dwelling numbers at GC have already increased by more than 5% but KNDP can choose to add to this or allocate sites in any village within the parish if it can be supported by latest evidence or local need	KNDP to consider all the villages in the Parish and are not restricted to KE subject to settlement hierarchy and other evidence
14	RR	Local Plan will be looking at the settlement hierarchy	
15	JH RR	Showed plan of radial circles around villages (supplied to SB at beginning of NDP process); Not familiar with this plan. Probably reflects different approach at one time to site allocation. Confirmed that need to look at 5-10% of the whole Parish, not just circled areas;	Circled approach to be disregarded from this point on- new approach welcomed as more robust than Census parish dwellings figure. SODC advise also that in future,

			they may provide dwellings figures for smaller villages
Item 4: Status of adopted versus emerging plan for the purposes of neighbourhood planning: Gallowstree Common			
16	RR KNDP	Need to work with the latest evidence; No guarantee that Gallowstree Common will be down-graded to 'other' village but the evidence is that it is not on the same hierarchy level as KE; 13 houses built at GC to date.	
17	RR	Confirmed plan period 2011 – 2033 for both emerging LP and NDP. Must be aligned.	SODC advise emerging Local Plan period may extend into 2034
18	RR	Should be working with both old and emerging policy	
Item 5: Dwelling Target			
19	RR	Starting point is census dwellings figure for the whole Parish at 2011 (516 dwellings); KE has already achieved 5% of 2011 housing through windfall since 2011 but KNDP are encouraged to go further to 10% or even more, if they so chose; These targets apply to the Parish as a whole not individual settlements; 5% of census total would be 26; 10% would be 52; KE must have evidence to support % chosen; Get more protection if go up to 10% - no additional protection if go over 10%. RR advises to aim for 10% (see Chalgrove NDP Inspector's report). Plan for local need	KNDP to consider % through NDP process {JH notes that the benefits of allocating dwellings in terms of demonstrating positive planning would hold whether one dwelling is allocated or an additional 10%. Sceptical about the idea that 10% is a 'magic figure' to reach, there doesn't seem to be anything in written policy that would make 10% (or 11%) 'better' or 'safer' than 9%. Having already met the 5% required by the Local Plan, anything extra is up to the group.} SODC advises, by contrast, that policy H8 of the emerging Local Plan publication version sets 5% as the minimum figure. The supporting text clarifies the indicative growth level (5% to 10%) subject to constraints and capacity considerations. The revised NPPF encourages NDPs to meet the indicative requirements set by the Local Planning Authority. In the absence of constraints and/or capacity issues, SODC states they are not clear what the justification would be not to achieve 10%.
20	RR	Even though the local plan allocation applies to KE	

	KDNP RR	as a 'smaller' village, houses built across the Parish since 2011 count towards the total NDP target to be delivered 2011 to 2033; Submitted evidence to date of built and permitted housing development since 2011 – 29 dwellings; (RR's figure of 23 dates back to March 2018); As KE has already met the minimum of 5% (5.6% to date), we can plan 'positively' from here; To meet 10% KDNP would need to find location for 23 dwellings, if it so chooses	
21	RR	SODC emerging local plan will support development in locations within the parish other than Kidmore End if that is what KDNP would like and if it is consistent with local and national policy and the consultation process. Compliance with the SODC hierarchy will be taken into consideration; Can rule out locations (for example as used at the Baldons KDNP) but there can be no guarantee against any development; Alternatively we can allocate all the development to KE (as Brightwell cum Sotwell NDP have allocated all into Brightwell cum Sotwell)	
22	RR	Other than the need to look at the Strategic sites in Call for sites, advised that otherwise stick to our deadline for the Call for sites of 15 September. Any further sites which might be submitted from then on can be recorded for any further reviews in the future after the NDP is made	
Item 6: Infill versus neighbourhood plan site allocations			
23	RR	Advises that it is better to allocate sites in the NDP (ie not rely on windfall or infill sites); KDNP to allocate as they see fit	
24	RR	NPPF requires local authorities to give a housing target figure to a NDP; in the case of Kidmore End the emerging Local Plan already does this	
	RR	See Infill policy 13.10 supporting text; infill will go on happening even if allocations are made. Cannot prohibit infill; There is never a freeze on this – 0.2ha/5-6 dwellings in 'smaller' villages and 0.1ha/2-3 dwellings in 'other';	
25	RR	Confirmed that if GC downgraded to 'other' infill would be 0.1ha and 2-3 houses	
26	RR	Smaller villages, as defined in the settlement hierarchy (appendix 7), are likely to deliver 5%-10% growth, based on the number of dwellings at the 2011 census, minus completions since 2011 and outstanding commitments.	KDNP to continue to monitor windfall development
Item 7: Relationship between neighbourhood plan allocations and SODC housing supply (3 years or 5 years)			
27	RR	Do not need to 'allocate' a site or sites but if KDNP chooses not to, it would not be protected by 3-year housing land supply point	
28	RR	Oxfordshire Growth Deal gives the whole of	RR to keep KDNP informed

		Oxfordshire a 3 year housing land supply test. The district council is expected to meet key deadlines set as part of the Growth Deal agreement.. The first is the submission of the Local Plan by March 2019. There are other deadlines which must be met (eg adoption of Joint Spatial Strategy)	
	Other		
29	KDNP	Raised issue of how land on the edge of Reading should be regarded as 'open countryside' or not. JH states that national policy indicates that it is not 'open countryside'. No further guidance from SODC.	RR to advise KDNP to consider through review of JH's Call for Sites and Facilitation reports
30	RR	No comment on the reason for refusal 1 for the land off Highdown Avenue	
31	RR	This is not the forum for discussion on the emerging LP in the light of the NPPF 2018;	
32	RR	To achieve affordable housing in the AONB need to have sites of 6 houses, not 4	
33	RR	Supported using Aecom for Masterplanning	
34	RR	SEA - Submit Site Assessment Report and RR will progress this	
35	RR	Small sites they will need detailed assessment. Consult with national bodies : Historic England; Natural England; Environment Agency;	
36	RR	Planning permission is not always a reason not to allocate and vice versa. Need to look at reasons for refusal. Decision is made on circumstances when application was made	
37	RR	New Locality transport tool available; KDNP can refer to traffic and environmental guidance in neighbourhood planning.org	
38	RR	Look at design and character; landscape design	
39	RR	Look at potential of designation of Local Green Space – eg. amenity facilities; community facility.	

