

# KIDMORE END PARISH COUNCIL

## KIDMORE END NEIGHBOURHOOD DEVELOPMENT PLAN

### RESPONSE OF KIDMORE END PARISH COUNCIL TO THE EXAMINER'S CLARIFICATION NOTE, ADOPTED BY THE COUNCIL AT ITS MEETING ON 17 NOVEMBER 2021

#### 1. Policy LCLG (Local Gap)

*Q. What is the relative importance of the 'scale of the gap' and the 'openness' issues in the policy? Is the relative importance of these two issues affected by the comments in paragraph 9.23 of the Plan that the purpose of this policy (and other related policies) is 'to ensure that the scale, massing and height of proposals do not result in the character of the physical and visual separation of settlements being undermined or the rural quiet nature of the road links between settlements being diminished'?*

Response: The key issue for the Parish Council is the 'openness' of the gap. The scale of the gap has been derived from the assessment of the area as set out in the NDP para 9.17 to 9.20 and on page 38 which needs to remain open in order to retain the separate identity of the settlements of Reading and Tokers Green. The Council did not seek to link our comments in 9.23 which refer to the type of development with the use of the wording 'scale of the gap'. The Council is happy for 'and the scale' to be omitted.

*Q. Taking account of the scale of the proposed Gap, its topography and the status of Tokers Green in the settlement hierarchy, is the prospect and/or likelihood of development so significant as to justify the proposed designation of a Local Gap in the Plan?*

Response: Respondent Perfectfield Ltd has set out the desire for development on part of the proposed local gap. In addition, the submission of extensive tracts of land on the remaining part of the proposed local gap in the Call for Sites and the Local Plan 2035 process (sites 1017 and 1269) also show the prospect of development in the gap if the area is not protected as a gap in its own right. These show that the prospect of development is significant and we are well aware of the pressure for expansion north of Reading. The scale of the gap has been determined by the area that is visible across the valley from the edge of Tokers Green and Reading. The Council wants to retain the distinct rural character and small scale of the settlement of Tokers Green which could be easily subsumed into Reading. This area is very vulnerable to expansion out from Reading.

*Q. How is the policy intended to relate to Policy LPLV (Local valued landscape policy)?*

Response: Although the area of the local gap is also covered by the LPLV, the two policies seek to achieve different goals. LPLV seeks to recognise that the land designated in the NDP is of locally

important landscape quality and value in its own right. The evidence provided in Appendices C1 and C2a and C2b and the enormous support for this policy by the local community shows this to be the case. NPPF 174 a) would apply with the protection commensurate with its status in accordance with 175. LCLG is, on the other hand, designed to protect the openness between and separate identity of two very disparate settlements thus preventing the physical or visual merging of these within a specific very vulnerable area of open land, regardless of whether it is a valued landscape. The two policy tests would both be applied to any development proposal.

## **2. Policy LCDPG (General Design Principles)**

*Q. I am minded to recommend that it is applied in a proportionate way taking account of the scale, nature and location of the development concerned. Does the Parish Council have any observations on this proposition?*

Response: The Parish Council feels that the design of even a single house may adversely affect the character of our small villages. However, it acknowledges that some forms of minor or domestic development may not affect the character. The Council would like the wording to retain the need to ensure that both larger developments and minor ones and their details of design as listed have regard to the character of the villages but it agrees that these requirements may not always be relevant in every case. The Council intended that the assessment of any development in relation to its location would take into account the evidence found in Appendix D1-6 to conserve the intrinsic settlement pattern, and the landscape polices to conserve the rurality of the open countryside. The Council wished to minimise future suburbanisation of the villages and protect the little details that contribute to the local character through LCDPG.

## **3. Policy LCDPA Design Principles: General Amenity Policy**

*Q. I consider that the list of amenity matters in the second part of the policy is supporting text rather than policy. To remedy this matter, I am minded to recommend that this part of the policy is deleted and repositioned into the supporting text. Does the Parish Council have any observations on this proposition?*

Response: The Parish Council is happy with this proposition.

## **4. Policy HDA (Housing Allocation)**

*Q. The Parish Council has sought to balance the statistical lack of a strategic need for new housing in the parish on the one hand with its expressed wish to deliver smaller houses to respond to local housing need on the other hand. Does the Parish Council wish to comment further on how it has*

*addressed this balancing act in general, and the weight which it has given to safeguarding the Chilterns AONB in particular?*

Response: Feedback from the community has consistently shown that protecting the rural character of the parish is the primary concern of our residents (see Appendix E1 Household Survey 2018 and Appendix E2 Community Event Survey November 2019).

The Household Survey and subsequent Call for Sites process both took place at a time when there were housing targets to meet, initially in Kidmore End village and then across the whole NDP designated area. As detailed in Appendix B3, The Housing Requirement and Allocation Paper July 2019, the Call for Sites process was initiated in July 2018. The requirement for growth was removed in January 2019.

The proposal to include a site allocation was considered on balance to still be appropriate after the growth targets were removed. The rationale for including an allocation is fully set out in the Housing Requirement and Allocation Paper (see Appendix B3) and summarised in Section 7 of the neighbourhood plan. It demonstrates a positive, proactive approach to the neighbourhood plan, contributes towards achieving the protection afforded under paragraph 14 of the NPPF and thus helps safeguard the AONB and its setting against inappropriate speculative development, and addresses the locally identified appetite for a limited number of smaller, more affordable houses (see draft KENDP Section 7). The infill growth that has taken place across the parish in recent years has led to an increase in relatively large and expensive houses. Many of the existing smaller houses and bungalows have been extended, reducing the housing mix in the parish. Including an allocation provides an opportunity to address this imbalance by delivering smaller homes.

A robust and detailed process to identify the most appropriate site was undertaken. As detailed in Appendix B1, Site Options and Assessment Report, the only site given a 'green' rating by AECOM as part of the site assessment process (site referenced as CFS8) is on greenfield land within Kidmore End village which is wholly in the AONB.

Given the favourable rationale for allocation, the Steering Group proposed including CFS8 as a small, allocated site at the in-person community event in September 2019. Despite significant publicity, responses to the community event survey were lower than for the initial Household Survey, although the responses were generally consistent with regard to community priorities. Respondents demonstrated support for the draft vision and objectives, the proposed suite of policies and the principle of including an allocation. There was also support for the allocation being situated in Kidmore End village (see Appendix E2 Community Event Survey November 2019).

A number of concerns were expressed by a small group of residents from Kidmore End living close to the proposed allocation during the Regulation 14 Consultation. Their concerns relate to the proposed allocation being on a greenfield site and the extension of the existing housing line into the arable field, as well as concerns that allocating a greenfield site would set a precedent for further development on greenfield sites within the parish. The concerns include the perception that development on CFS8 goes against the policies in the KENDP and should not be permitted on these grounds.

The Steering Group fully understand these concerns and have sought extensive advice on these matters. As a result of this advice, it is the understanding of the Steering Group and Parish Council that including a small allocation of this nature would not set a precedent to build on greenfield sites and would not undermine the objective of protecting the AONB and the land within its setting across the parish. The positive action of including an allocation could help to safeguard the AONB and its setting, particularly in the event that the local planning authority cannot demonstrate a 5 year land supply. Although the site is a greenfield site, it is relatively small (approximately 0.2 hectares), development would be limited to 3 – 4 smaller houses and the site sits within the envelope of the village of Kidmore End (see D7 Housing Allocation March 2021). Kidmore End, the only smaller village in the parish, has had one additional dwelling built since 2011 in contrast to Gallowstree Common and Tokers Green, which are both other villages, and have seen growth of 14 and 8 dwellings respectively and Cane End, which is classed as open countryside, has had 11 additional dwellings built in this time. Kidmore End village is, therefore, considered an appropriate location for an allocated site, and a review of potential sites during the call for sites process has indicated that CFS8 would be the most appropriate of those put forward.

Safeguarding the AONB whilst including an allocated site has been a complex balancing act. Appendix D1 – D6 Visual and Spatial Character has been created to support the Local Character policies and to help ensure that the rural feel of the parish as a whole and the individual characteristics of each of the five villages are essential considerations for any future development.

In summary, the Steering Group and Parish Council believe that the KENDP places significant emphasis on the desire to protect the AONB and its setting from inappropriate development through its suite of Local Character and Landscape policies, whilst responding in an appropriate and considered way, within the constraints of the call for sites process, to the perceived need for a limited number of smaller, more affordable dwellings.

*Q. Does the Parish Council have any reassurance from the site owner/potential developer that development proposals will respect criterion 4 of the policy (on the sizes of the properties)?*

Response: The landowner put the site forward as part of the call for sites process. The landowner attended the first community event in September 2019 when the site was first proposed as an allocated site for a limited number of smaller houses. The landowner did not raise any objections as part of the Regulation 14 Consultation. The landowner was contacted by email by the Steering Group after the Regulation 14 Consultation and confirmed by email that nothing has changed.

*Q. How does the Parish Council anticipate that the size of the four properties identified in the policy will be retained in perpetuity?*

Response: The intention of the Housing Allocation policy is to guide the development of 3 – 4 smaller (2 – 3 bedroom) dwellings. The size of the site (0.2 hectares) has been specified so that it can support that number and type of dwelling without providing opportunity for further extension to the site. The intention is that the configuration and design of the houses would restrict opportunities to extend these dwellings. The Steering Group and Parish Council would welcome any policy wording that would help to safeguard these intentions.

## **5. Policy LPCS (The Chilterns AONB and its Setting)**

*Q. Is it reasonable a policy would apply both within and outside the designated Chilterns AONB? Would such an approach have regard to national policy?*

Response: The Parish believes that it is reasonable to cover both the AONB and its setting under one policy. LPCS is designed to reflect Local Plan policy ENV1, where bullet 1 includes both the AONB and its setting. NPPF 176 also now refers to the setting of AONBs in para 176: *‘The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’*. Planning Practice Guidance also states: *Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.* Paragraph: 042 Reference ID: 8-042-20190721. Revision date: 21 07 2019. Section 85 of the Countryside and Rights of Way Act also says that the local authority’s legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). This is set out in the Chilterns AONB Management Plan 2019-2024

development chapters and its Position Statement. Taking all the above into account, The Parish Council feels that the policy should cover both the AONB and its setting.

The policy is ultimately designed to conserve and enhance the AONB. The setting is included to ensure that any development within the setting is assessed to ensure that it does not result in harm to the purposes and special qualities of the adjacent AONB. Such development may have an effect on the views to or from the AONB, but equally may have an adverse effect on landscape features that are typical of and often contiguous with the special qualities of the adjacent AONB. One example is the dry valleys that extend out from the AONB as far as the Reading border. NPPF Para 176 applies the 'highest level of protection' to 'within' the AONB so the Council sees that the setting would be considered as having a say medium-high level of protection, just below that of the AONB, given the above objectives of the policy and national guidance.

The Parish Council therefore feels that the policy is in accordance with national and local policy.

## **6. Policy LPLV (Local valued landscape policy)**

*Q. Its approach overlaps with that of Policy LPCS. Is it appropriate for a Plan to have two separate policies which affect largely similar areas?*

Response: LPCS does not affect a specified area as the NDP acknowledges that some parts of the area in the parish outside of the AONB may not meet the setting criteria (as set out in NDP para 11.19 and CCB's Position Statement). Development sites which do meet the setting criteria will need to pass a higher LPCS test in accordance with the NPD's LPCS, Local Plan ENV.1 and national policy. The Parish Council, however, feels strongly that the whole of the area satisfies the test as a locally valued landscape. The two policies, therefore, have different objectives: one to conserve and enhance the AONB, the other to conserve and enhance a local valued landscape.

*Q. How would the Parish Council anticipate that South Oxfordshire District Council would determine the weight to be given to the two policies when determining development proposals in this part of the neighbourhood area?*

Response: The Parish Council anticipates that the District Council would apply the higher test under LPCS in the first instance. The Parish Council would expect the District Council then to apply the test under LPLV. Any particular development may or may not be contrary to one or both of these policies.

*Q. Does Policy LCLG (Local Gap) identify a specific parcel of land which is more important for its role as a Local Gap rather than for its inherent landscape value?*

The area of land identified for the local gap is considered the minimum needed to maintain the separate identity of the two settlements: Reading and Tokers Green. The assessments for the Local Landscape Value show that this land is also inherently part of the local valued landscape based on the quality of the landscape. The land is therefore important in both regards and, as in the responses above, the two policies seek to achieve different objectives. The Parish Council feels that the importance of some of this land as a gap has been tried and tested through appeals and sets a precedent. On the other hand, the LPLV policy is very important to the parish, but it is new to South Oxfordshire and yet to be tested and we would be concerned if LPLG were to be dropped as a separate policy.

## **7. Policy LTSRU (Safety for Road Users)**

*Q. Does this policy add any distinctive parish value to local and national policies?*

Response: From the 1<sup>st</sup> public engagement throughout the process of developing the draft NDP there have been a number of themes from residents in addition to housing. One theme is that they value greatly the rural setting of the parish. Another theme was for the road system to be safe but to keep its rural aspects.

The value of this policy is to consider the impact of development on road safety in the particular context of the parish. The focus of the transport and road safety policies in the NPPF and Local Plan 2035 focus on sustainable modes of transport such as public transport, cycling and walking. Other than on the A4074 road, parish does not have public transport, the roads are narrow, cars frequently travel above the speed limits and many families do not consider it safe to walk or cycle on the country roads in and between our villages with their children. Increased traffic from development will add to these issues generally, and may cause specific, localised issues resulting from blind bends, particularly narrow parts of lanes, poor visibility, certain high traffic areas, etc.

During the time taken for the draft NDP to get to this stage, a number of actions have been taken by the Parish Council relating to road safety in the different villages. Speed assessments have taken place, posters have been put up to remind drivers to drive slowly and traffic calming measures have been considered.

This policy is important within the NDP as it seeks to promote road safety whilst recognising that the narrow unlit lanes, high hedges and lack of urbanising road markings are important rural characteristics of our parish. All of these features are in general to be kept, but with the adage that there is as much consideration to the safety of road users, cars, pedestrians, cyclists and horse riders as possible, when there is new development.

## **8. Policy LTSAP (Access and Parking)**

*Q. Does this policy add any distinctive parish value to local and national policies?*

Response: The access roads within the parish are all winding and narrow but quite heavily trafficked. There are a very limited number of footpaths, so the roads are used frequently, at their peril, by walkers, runners, cyclists and horse riders.

Parking is a particular problem in Kidmore End at school drop-off and pick-up times. There is limited parking at the New Inn public house and the School opens up its playground for parking when there are school or church events. There is one public car park at the Diamond Jubilee Pavilion in Gallowstree Common, for about 20 cars. The access road and parking area are not tarmacked and the area is unlit. The area is mainly used for sporting events, dog walkers in the woods and the play area.

Where there is car parking on the road, it can lead to road safety issues in general and challenges for larger vehicles including emergency vehicles, refuse carts, farm vehicles, lorries and delivery vans, resulting in jams, possible accidents and pollution.

The aim of the policy is to put particular emphasis on the need for future developments to provide adequate and long term parking arrangements for those living in and visiting our villages, to prevent any need for additional on-road parking. With no public transport or cycle paths, the majority of residents rely on their cars to access nearby villages and towns. With increasing cars per household, safe access and parking is becoming increasingly problematic. This policy is important to address these specific requirements for the parish.

## **9. Engagement of the community in the housing site selection process**

*Q. Does the Parish Council have any comments on this matter?*

Response:

The Parish Council is satisfied that the KENDP Steering Group have followed the appropriate Call for Sites and site selection processes, as advised by SODC and in line with neighbourhood planning requirements. The local community have been invited to engage with the process from the very start of the NDP process. Section 5 of the KENDP details the events, surveys and consultations that have taken place and how feedback from the community has been used to shape the KENDP. Further details are provided in Appendix E: Community Engagement.

Evidence of the consistent and fair manner in which the Steering Group has engaged with the local community can be found in the three documents referenced in response to the Keep Kidmore End Green Group section below.

*Q. More generally, does the Parish Council wish to comment about the extent to which the Plan has secured 'a shared vision for their neighbourhood and shape(d) the development and growth of their local area' as set out in Planning Practice Guidance (ID: 41-001-20190509)?*

Response: The Parish Council is satisfied that, with the help of community feedback and in line with Planning Practice Guidance for neighbourhood plans, the KENDP has secured a shared vision for the parish and shaped the plan for future development that respond to the priorities expressed by our residents. The KENDP reflects the views of residents from all five villages in the parish, obtained through a number of events and surveys conducted over the last four years. The priorities and preferences of residents have remained consistent throughout this period. The KENDP vision and objectives relate to the whole parish, and the preservation of the rural character of our parish is a vision shared by the whole community.

Keep Kidmore End Green

The KENDP Steering Group has responded previously to the main points raised by the KKEG group. The Parish Council is satisfied with the responses from the Steering Group. The main points raised by KKEG and the Steering Group's responses can be found in the following documents:

- Appendix E3 Community Questions and Answers January 2020, updated July 2020
- Report to KEPC February 2020 (Appendix 1 attached)
- Regulation 15 response to KKEG July 2021 (Appendix 2 attached)

## **10. South Oxfordshire District Council**

*Ref 2: As drafted the Kidmore End Parish Neighbourhood Plan does not reflect the First Homes policy requirement.*

Response: The First Homes Policy was published on 24<sup>th</sup> May 2021. The draft KENDP was submitted to the Parish Council for the Regulation 14 Consultation on 7th November 2020 and for Regulation 16 in July 2021. The First Homes Policy relates to affordable housing and as this type of housing is neither a requirement nor a component of the KENDP, it is the Council's understanding that this policy is not relevant to our plan. Our understanding is that transitional arrangements will be applied to local and neighbourhood plans that have been submitted for examination before 28 June,

as well as those that have reached publication stage before 28 June, as long as they are submitted for examination before 28 December. In the case of KENDP, the examination phrase was started before 28<sup>th</sup> December 2021.

South Oxfordshire District Council recently published an advice note which summarises and explains the changes brought in by the introduction of First Homes, and how this applies to the district. The District Council's advice note can be found [here](#).

*Ref 3: 'The purpose of these Policies is to encourage planning applications the local community wants to see and discourage applications for developments that they do not want.' We recommend that this sentence is replaced with: 'The purpose of these Policies is to guide how planning applications should be determined'*

Response: The Parish Council is happy with this suggestion

**Ref 4: Quiet Lanes Policy (LCQL)**

*We recommend the wording is amended to read: 'should preserve and where possible enhance...'*

Response: The Parish Council is happy with this proposition.

**Ref 5: General Design Principles Policy (LCDPG):**

Response: The Parish Council is happy to accept the changes suggested by the Examiner

**Ref 6: Design Principles: General Amenity Policy (LCDPA)**

Response: The Parish Council is happy to accept the changes suggested by the Examiner

**Ref 7: Housing Allocation Policy (HDA)**

*Add 'New development will be expected to take account of known surface and sub-surface archaeology, and ensure that other potentially significant deposits are identified and appropriately safeguarded during development. Where possible, the legibility of archaeological features should be preserved.'*

Response: This is agreed by the Parish Council.

**Ref 8: The Chilterns AONB and its Setting Policy (LPCS)**

*Delete 'in the south of the parish' after AONB.*

Response: The Parish Council is happy with this proposition.

*We recommend 'where possible' is inserted in front of 'enhanced'.*

Response: The Parish Council has followed the wording in NPPF July 2021 para 174 which refers to 'protecting and enhancing' and para 176 refers to 'conserving and enhancing' and does not use the words 'where possible'. The Parish Council considers that the wording complies with National Policy. This wording also complies with the purposes of the AONB and national guidance to local authorities dated June 2018.

*We also recommend that the sub-bullet points starting 'Broadleaved woodlands' are moved to the supporting text.*

Response: The Parish Council is happy with this proposition. It suggests that the wording is omitted from the policy but is retained in supporting text under para NDP 11.19. However, in order to retain the purposes of policy LPCS the Council would like to make the following small change to para 11.9: replace 'The special qualities include the following:' with 'The special qualities of the AONB and its setting are:'

### **Ref 9: Local Valued Landscape Policy**

*The supporting text to the Locally Valued Landscape Policy (11.30 and 11.31) states that the area is shown through the landscape sensitivity study to satisfy the criteria to be a locally valued landscape, this should refer to the valued landscape assessment not the sensitivity study.*

Response: The landscape sensitivity study Appendix C1 provides the baseline evidence which informed the valued landscape assessment set out in Appendices C2a and C2b. All of these documents are relevant. The Parish Council agrees that, after 'Landscape Sensitivity Study' in NDP para 11.30 , the words 'and the Local Valued Landscape Assessment' added.

*Remove 'only be permitted where they' and add 'where possible' before enhanced in the policy.*

Response: Please see response above on 'where possible'. The Parish Council would be happy with the wording to be changed to 'Development proposals should be permitted where they protect and

enhance the physical and visual attributes of the character, quality and appearance of this valued landscape' which omits 'only'.

*Omit 'Where development is' in the policy*

Response: The Parish Council is happy with this proposition.

***Ref 10: Appendix C – Kidmore End Landscape Sensitivity Study, terra firma a consultancy ltd 2020***

*Update Landscape Sensitivity Study with reference to the Local Plan, the current Landscape Character Assessment 2017.*

Response: The Parish Council is happy to ask The terra firma Consultancy Ltd to update the policy aspects of the study, if required by the Examiner.

*Several comments on the approach taken to the sensitivity study.*

The study was undertaken in accordance with best practice and has been commended by several parties, including the Chilterns Conservation Board. The Parish Council considers that the study has been very thorough and has clearly identified the landscape quality and value of area through the three documents in Appendices C1, C2a and C2b. The Local Valued Landscape Assessment builds on the landscape sensitivity study and we consider that the assessment of local landscape value is still in accordance with current best practice in the Landscape Institute's Technical Guidance Note 02/21 on for assessing value outside of nationally designated areas (Feb 2021). The Parish Council feels that no further work is required.

***Ref 11: Appendix Ca Topic Paper on Kidmore End Local Valued Landscape***

*Do changes to NPPF in 2021 and the local plan 2035 have a bearing on the Topic Paper?*

Response: The Topic Paper C2a was written in the light of the new Local Plan policies and the Parish Council considers that, in order to bring the Topic Paper up to date, no changes are needed except to remove reference to the Core Strategy and Saved Policies; to revise the NPPF paragraph numbering and wording on valued landscapes in accordance with July 2021; and to refer to the Landscape Institute's latest guidance on assessing valued landscapes {Technical Guidance Note 02/21, if requested by the Examiner.

**Ref 12: Appendix Cb Kidmore End Local Valued Landscape Assessment**

*Further work to be undertaken to show link between landscape sensitivity study and the local valued landscape assessment.*

Response: The Parish Council confirms that the landscape sensitivity study informed the local valued landscape assessment. It does not feel that further work is needed, as the documents are both clearly written and the links can be easily identified.

**Ref 13: Appendix C2: Topic Paper on Kidmore End Local Valued Landscape**

*Confusing references to Appendices.*

Response: The Parish Council suggests that C2a should be edited to include the correct Appendix references.

**Ref 9: Preservation of Footpaths, Bridleways and Tracks Policy (LTPFBT)**

*Para 12.8: Supporting text should be reworded taking out reference to 'visual impact'*

Response: The Parish Council asks whether this should be rephrased from 'visual impact' to 'visual contribution'?

**11. L&Q Estates (Barton Willmore)*****Separation of Settlements Policy (LCSS)***

*We do however raise concern with the supporting text contained at paragraphs 9.14 to 9.23. This paints an unduly restrictive intent to the inclusion of this and other policies (which we have commented upon separately below). Specifically, paragraphs 9.15 to 9.16 which can be interpreted as these areas being highly sensitive to change, affecting the appreciation of each settlement. Paragraph 9.23 suggests that a level of protection commensurate with AONBs and their setting should be applied to this land. Such an approach is not justified and should be deleted or, if retained, substantially modified. In conclusion, therefore, we do not consider the approach taken in this section of the KENDP meets the basis conditions for having appropriate regard to national policy and contributing towards the achievement of sustainable development.*

Response: Read as a whole, it is clear what LCSS is designed to achieve. 9.15 and 9.16 describe the characteristic features of the rural landscape between the settlements which the Parish Council seeks to conserve. The 9.23 clarifies that should any development pass the AONB and its setting tests, the requirements of LCSS should also be considered.

### ***Local Gap Policy (LCLG)***

*In our view, there is no need to include the Local Gap Policy within the KENDP. Where appropriate, the objectives of the policy will be achieved through the Separation of Settlements Policy (which we have commented on above). Furthermore, with regard to the policy wording, we object to the inclusion of a gap designation (Map 2) which, as an approach, is not supported by national policy. Instead, a criteria-based approach, akin to that set out in the Separation of Settlements Policy, is an appropriate approach. Irrespective of whether a designation is retained, the wording of this policy, referring to "openness" is at risk of adopting a quasi Green Belt approach. The degree of protection afforded by the Local Gap Policy exceeds that of the Separation of Settlements Policy and is not justified. The policy also infers a 'scale rule' approach to gaps between settlements which is not robust and considered inconsistent with the more nuanced approach contained within the Separation of Settlements Policy.*

Response: The Parish Council welcomes the support for LCSS set out in this response. The Local Gap policy is considered necessary to protect a particularly vulnerable area of land between Reading and Tokers Green and has been limited to the minimum of land requiring special protection.

The importance of including the local gap is clearly set out in NDP paragraphs 9.17 to 9.22. The Parish Council has not applied a 'scale rule' approach to the gap.

### ***The Chilterns AONB and its Setting Policy (LCCS)***

*This policy repeats the first limb of the Policy ENV1 of the adopted Local Plan and then lists the AONB's special qualities. There does not appear to be any need or justification for this policy being included within the KENDP we therefore recommend that it be deleted.*

Response: LPCS draws together the features of the AONB and its setting which are found within the parish, based on the detailed studies undertaken by The terra firma Consultancy Ltd. The policy also emphasises the importance of Local Plan Policy ENV1 to the parish and reflects the special AONB qualities of the setting to aid local planning decision making.

### ***Locally Valued Landscape Policy (LPLV)***

*As stated above, we object to an approach which seeks to introduce a level of protection which is commensurate with AONB policy. In our view, this is a further layer of policy protection which the*

*KENDP seeks to introduce to prevent development outside of settlements. It unnecessarily duplicates with other policies. if a LVL policy designation is to be included, in our view, it is unjustified to include all land within this area and for it to be subject to such a high level of protection.*

Response: The LPLV is not commensurate with AONB policy as this is a locally valued landscape in accordance with NPPF and should be given the appropriate weight. The detailed assessments in terra firma's work showed that the whole of this land meets the criteria for a locally valued landscape. The current Landscape Institute's Technical Guidance Note 02/21 on assessing value outside of nationally designated areas also makes it clear that parcels of land should not be conserved in isolation but must be looked at in context, which is the approach the Parish Council has taken.

## **12 Real Capital Investments (GL Hearn)**

Pursuant to the desktop review conducted by AECOM, the Parish Council will not be revisiting this site for allocation.

## **13 Perfectfield Limited**

The Parish Council will not be considering this site for allocation, pursuant to the desktop review conducted by AECOM. The Council refers to the reasoning as set out previously in the Regulation 14 Consultation Statement; "There is coalescence issues with this site, for the village of Tokers Green and the urban area of Caversham as highlighted in the inspector's report, following the rejection of the planning applications at appeal."

## **14 Oxfordshire County Council**

### ***Green Spaces Study***

*Request to remove the designation of Kidmore End Church of England Primary School grounds as a locally important green space in 'Appendix D1-6 Visual and Spatial Character'. Reasons are set out in Response 53.*

Response: The proposed Local Green Spaces are not subject to NPPF 101 to 103 but are intended to identify open land that is valued by the community which should be protected under NDP policy LCDPG which seeks to complement, enhance and reinforce the local distinctiveness of the relevant

settlement. The identification of this land is not designed to prevent development but ensure that any development proposals have regard to the importance of the open space to the village.

*We have not been contacted by the landowner regarding this potential designation during the plan making process.*

Response: OCC were one of the statutory bodies contacted as part of the Regulation 14 Consultation. The Steering Group was not informed at that stage of any objection to the inclusion of site 4 as a green space or of the requirement to correct the ownership of this land (see appendix D). The ownership information will be amended.

*Ownership of Site 9 Wood Lane/Horsepond Triangle, Gallowstree Common - reference to Oxfordshire County Council Highways should be removed in Annex C 'Record Sheets for the Green Spaces Study' of 'Appendix D1-6 Visual and Spatial Character'.*

Response: The Parish Council has no recollection of the Wood Lane/Horsepond Triangle, Gallowstree Common being a village green. Ownership information will be amended once ownership is confirmed.

### ***Highway matters***

The Parish Council acknowledges the comments made by OCC about Highway Matters.

## **Report to KEPC: Kidmore End Neighbourhood Development Plan**

**February 2020**

**Prepared By: Kidmore End NDP Steering Group**

**Copy sent to: SODC**

### **Overview**

This report is in response to a request from Kidmore End Parish Council to provide clarity concerning the process followed in the preparation of the Kidmore End NDP, in particular the process surrounding the emerging proposal to allocate a site for residential development within the NDP. The issue has been raised by [named individual] on behalf of a small number of residents in a letter to the Kidmore End Parish Council dated 9<sup>th</sup> January 2020. The same residents have also corresponded directly with the KE NDP Steering Group who have provided responses to their letters.

This report will address the two specific areas of concern of this small group of residents.

Part 1: The rationale behind the proposal to allocate a site

Part 2: The process followed

This report will demonstrate that, over the course of the last two years since inception, the Steering Group has proactively sought and carefully considered expert advice from two independent sources, namely South Oxfordshire District Council SODC and Aecom, to inform its approach and recommendations, as well as feedback from the community.

It is important to state that the steering group is an independent advisory committee taking the preparation of the neighbourhood plan forward on behalf of the parish council. No formal decisions are made until such time the parish council makes those decisions. As such, for the avoidance of doubt, it should be made clear that the proposed allocation within the emerging neighbourhood plan is merely a recommendation. The parish council will decide whether to approve the draft plan when appropriate.

This report will also demonstrate that the process followed has been appropriate and conducted in good faith with the interests of the community at the forefront of all activities. Guidance has been provided from both SODC and Aecom, and 12 months on, the Steering Group remain aligned behind the validity of their recommendation to include an allocated site within the Kidmore End NDP. Ultimately the community will decide whether the plan should be used to help determine planning applications at a local referendum. Community feedback to date suggests significant support for an allocated site from the community.

## Reference Documents

There are a number of documents and sources of information which explain the evidence and information that has been gathered to inform the proposed content of the NDP. These documents also explain the Call for Sites process and the context in which this was initiated, as well as the rationale behind the proposal to include a site allocation within the Kidmore End Parish NDP. All documents are in the public domain and can be found on the NDP pages of the Kidmore End Parish Council website. These documents contain all the relevant information.

1. KEPC Website: Call for Sites Process
2. Facilitation Report, provided by Aecom, December 2018
3. Site Options and Assessment Report, provided by Aecom, November 2018 (with minor updates April 2019)
4. Housing Requirement and Allocation Paper (formerly known as the Topic Paper), July 2019
5. Community Event information boards, September 2019
6. Community Event Survey Results, November 2019
7. Kidmore End NDP Community Questions and Answers, January 2020
8. Minutes from the Steering Group Meeting, 22<sup>nd</sup> January 2019
9. Minutes from the Steering Group Meeting, 19<sup>th</sup> February 2019
10. Minutes from the Steering Group Meeting, 19<sup>th</sup> March 2019

### Part 1: The Rationale for Site Allocation

The information in documents 1 – 3 below provides both the context and the reasoning for the proposal to include a site allocation within the NDP. Information and evidence gathering took a number of months and involved the production of two key reports (i. The Facilitation Report, ii. The Site Options and Assessment Report).

These reports highlight the complexity of the Kidmore End NDP. There are 5 villages within the parish and the NDP is being created in the context of a slow moving emerging local plan, the content of which is not certain. Growth targets for settlements from SODC have changed across the last two years. The initial stated target of 6 – 13 additional dwellings in Kidmore End village in September 2017 changed to 26 – 52 additional dwellings across the parish in 2018 and then to zero in December 2018. This growth target could be subject to change going forward.

Regardless of changing growth targets, the primary driving force behind the Kidmore End NDP is the very real threat of significant unplanned development on the Reading boundary and within the villages in the parish and the impact that would have on traffic, roads and the general feel of the parish. These concerns have been strong and consistent themes in community feedback. The aim of the Steering Group is to demonstrate a positive approach to sustainable development within the parish (as required by Government), whilst protecting the parish from inappropriate development and, in particular, large scale unplanned development.

The following is an extract from the Site Options and Assessment Report, produced by Aecom in November 2018:

*...SODC advises, and AECOM agrees, that the benefits accruing to Parish Councils allocating some land for housing development (for example, a share of CIL receipts, and the potential to demonstrate a positive approach to planning at Examination) mean that there is a strong*

*case nevertheless to allocate at least some land for housing, an approach encouraged by the emerging Local Plan (see Chapter 3 below), and by paragraph 69 of the NPPF.*

The Steering Group has listened to the views of the community as well as the views of the experts (SODC and Aecom). The group has reviewed all available information and evidence available (as presented in the documents referenced) to ensure that it uses its best judgement to come to a recommended approach that best supports the NDPs overall objectives. The Steering Group believes that, on balance, the best approach to influence sympathetic development is by demonstrating a positive approach through the inclusion of a small site and producing an allocated site policy that specifies requirements for that site.

An extract from the Housing Requirement and Allocation Paper (document 4), prepared by the Steering Group in July 2019, refers to the results of the Housing Survey, conducted in May 2018:

*The responses from the survey showed that there is a perceived need for smaller and less expensive houses in the parish. The majority of respondents felt there was scope for housing development within Kidmore End village, and approximately half of respondents thought there was also a need for more houses in the other villages. The strong preference was to limit development to between 1 and 4 dwellings per site. Residents expressed a preference for semi-detached or detached houses or bungalows and the majority of respondents felt that it was very important to consider housing design, build quality, impact on neighbours, road safety, access and off-street parking as part of the planning process.*

*Feedback via the survey was sought at a time when requirements from SODC were to achieve growth targets of 5 – 10%. However, this requirement of the Parish has now been removed. Over a number of years, many of the bungalows and smaller houses in the villages have been extended resulting in a considerable change in housing stock across the parish. Furthermore, the cost of housing in the area has increased considerably resulting in a significant reduction in home affordability. Year on year housing growth has taken place organically in Gallowstree Common, Cane End and Tokers Green since 2011 whilst one additional dwelling has been built in Kidmore End (see Table 1 and Figure 1).*

*Taking all of these factors into account, and in line with the outputs of the Household Survey, the KENP Steering Group recommends that a small development within Kidmore End Village of 3-4 dwellings would be most appropriate for allocation in the Neighbourhood Plan.*

## **15.2 Conclusions**

*The allocation of a small site for 3-4 dwellings at Kidmore End village would help strengthen the NDP and demonstrate a positive approach to sustainable development in the NDP area as required by national and local policy. It would make a small contribution to the continued sustainability of the village and deliver a small contribution by the Parish's Neighbourhood Plan Area to SODC's overall housing needs. In doing so it would help towards achieving a plan led approach to development as required by national policy and provide better protection from speculative unplanned development in the neighbourhood plan area.*

*The only site within the NDP area of Kidmore End which, following the above assessment process, is suitable, available and deliverable for allocation in the neighbourhood plan is CFS 8. This site would be able to accommodate a small development of 3-4 dwellings. The allocation is in line with SODC development plan policies, the outputs of the Household*

*Survey and also the AECOM evidence and further assessments that have been undertaken during the call for sites process.*

The initial vote on whether or not to include an allocated site in the draft NDP was taken by the Steering Group in January 2019. Since then, the rationale behind this proposal has been explained in the Housing Requirement and Allocation Paper (document 4), the Community Event information boards (document 5), and the Community Q&A (document 7).

Community feedback has been sought and received at the September community events and through quantitative and qualitative questions raised in the online survey (document 6).

The following results relate the question of allocation:

*Q6: To what extent do you agree with the principle of allocating a site for development within the NDP?*

ANSWER CHOICES	RESPONSES	
Fully support	70.31%	90
Partly support	16.41%	21
Don't support	9.38%	12
No opinion	3.13%	4
TOTAL		128

Following the September events and the results from the community survey, the Steering Group produced a follow-up Q&A to cover the main themes of the feedback, further explaining the rationale for the proposed allocation. This was posted on the KEPC NDP website in January 2020.

### *3. Why is it necessary to allocate a site when our housing targets have reduced to zero?*

*This is one of the most important decisions within the NDP and the Steering Group have considered this at length. Despite there not being a housing target for smaller villages currently, this could change. The results of the Household Survey in 2018 indicated an appetite across the parish for more housing, on small sites. This appetite for small, controlled growth was reiterated in comments provided in the September 2019 Community Survey.*

*The Steering Group have sought advice on the pros and cons of including an allocated site versus relying on organic growth to deliver the number and types of housing that would match our local requirements. For all the reasons outlined at the Community Event, available to view in the event information document on the KEPC website, we believe we are in the best position to contest large scale speculative development and other unsuitable developments by taking a proactive and positive approach to allocation in line with the National Planning Policy Framework 2019 (NPPF). If the parish has a housing allocation within the NDP, the whole plan area is covered and protected by a 3 year land supply. This is important as the current delay with the finalisation and ratification of the SODC Local Plan increases the risk of speculative development interest across the district.*

It should be clear from the information provided above that the initial decision to recommend the inclusion of a site allocation in the NDP has been tested and retested over the course of the last year both in ongoing discussions within the Steering Group and by making all relevant information available to the community. The Group remains in agreement that this approach provides the greatest potential benefits and is the best way to mitigate against the biggest risks threatening our

parish. The results of the community survey indicate that the vast majority of respondents share this view. Independent of the Steering Group, the parish council will be required to make a formal decision on the emerging NDP's preferred approach before the plan is presented to the local community for the pre-submission statutory consultation.

## **Part 2: The process followed**

The letter received by KEPC by a small group of residents suggests that the Steering Group have failed to follow the correct process for arriving at the recommendation to include a site allocation and, specifically, that this was not covered as an agenda point, but rather as AOB.

The minutes from the Steering Group Meeting on 22<sup>nd</sup> January 2019 (document 8) indicate that this is not the case. The minutes also indicate that the advice from Aecom (and SODC) was not the only evidence used to inform the proposed approach. Community feedback was also considered. The minutes also make clear that the decision to allocate a site should be made independently of the site assessment and selection process. The following text is taken from the Steering Group minutes published on the KEPC website.

### **4. Call for Sites update:**

*The NDP Steering Group has met with SODC to discuss the progress we have made on the call for sites process. The facilitation report and call for sites initial assessment was provided to SODC for comment. These comments have not yet been recorded in writing or circulated.*

*It was agreed that the minutes of the meeting with SODC would be distributed to the Steering Group.*

*Next step for the NDP Steering Group:*

*The next step for the Steering Group is to make a decision on housing allocation. According to the latest Emerging Local Plan, Kidmore End as a smaller village is no longer required to achieve the previously communicated target of 5 – 10% growth.*

*However, SODC have advised that if there is an evidenced need for more housing in our Parish, the NDP is able to allocate at least one site and this would support the positive planning principles as highlighted in the housing policies in the NPPF. Including an allocation in the NDP would give a three year land supply protection for a period of two years from the date the NDP is adopted and would help to protect the Parish from speculative development. SODC currently have a five year land supply and based on meeting various targets will be protected by a 3 year land supply under the Oxfordshire Growth Deal until March 2021.*

*The Steering Group reviewed the outputs from the community household survey, which indicated some appetite within the community for small scale development in Kidmore End and other villages.*

*According to information on housing development in the parish since 2011 (the start of the plan period), Kidmore End Village has only grown by one house compared to the other villages in the Parish which have had significantly more growth. Kidmore End under the latest version of the SODC Emerging Local Plan will be the only 'smaller village in the NDP Area. Gallowstree Common is being reclassified to 'Other' Village designation and has seen growth of 13 houses. Tokers Green (Other Village) has seen growth of 6 dwellings. Cane End is being reclassified to unclassified (open countryside) and has seen growth of 13 houses. Chalkhouse*

*Green has had no growth and remains unclassified (open countryside). Kidmore End village due to its limited growth may be vulnerable to speculative development even though it is in the AONB.*

*There has been an assessment of potential sites by Aecom within the Parish. and only one 'green' site has been identified. Any site that is to be considered for development also needs to be assessed by Oxfordshire highways and for Environmental/Landscape and Heritage issues for the next stage of assessment.*

*The Steering Group was asked about whether we want to vote on whether or not to allocate a small site in the NDP. At this stage the question is whether to include an allocation in principle, and not which site might be suitable for allocation*

*6 members recorded a Yes to the vote, 2 members decided to consider the options overnight. 5 members were absent.*

*Action:*

*Steering Group members to indicate to the Call for Sites sub group which way they would like to vote. Within 24 hours one Steering Group Member voted Yes and one No therefore the overall vote was 7 in favour of allocation and 1 not in favour. The decision has therefore been taken in principle to allocate a small site in the NDP based on the information available.*

The vote took place following a detailed presentation by the Call for Sites sub-group of the information gathered to date. Relevant information includes both written guidance from SODC and Aecom as well as more informal information provided by them during meetings and phone calls. As the Call for Sites sub-group were responsible for liaising with Aecom and SODC they were best placed to provide feedback and suggest an appropriate course of action. Steering Group members were asked whether they felt able to vote at that time with the information available. 6 indicated they wished to vote in favour of allocation and 2 opted for further time to consider.

At the next Steering Group meeting, on 19<sup>th</sup> February 2019, a further update was provided along with consideration as to how to engage the community. The following text is taken from the Steering Group minutes of February 2019 published on the KEPC website (document 9).

### ***3. Call for sites, Facilitation Report and Topic Paper update***

*Members of the Call for Sites sub-group and chair met SODC on 18 February to discuss the way forward on finalisation and publication of Aecom's Sites Options and Assessment and Facilitation Reports and guidance on involving the community, in particular in relation to the agreed allocation of one small housing site and where this should be. Minutes of that meeting will be made available to the Steering Group.*

*SODC advise that the Aecom Site Options and Assessment and Facilitation advisory Reports are accompanied by a Topic Paper (TP). This will explain the changes in Local Plan policy since these reports were written and set the context of the reports. The Topic Paper will also set out the way forward and explain why a site, if allocated, has been identified for allocation for a small housing site. SODC will provide an outline of the TP for us (expected w/c 25 February) so we can then populate it.*

*On completion of TP, all 3 reports will go on the Kidmore End Parish Council website. This would tie in with the Community Engagement Event and enable comments from the local community. Landowners who submitted sites in response to the Call for Sites process will also*

*be informed of the reports being on the website and be invited to comment, should they wish to do so.*

*The Call for Sites process is not open to further site options. Sites put forward remain on the list unless a new owner writes to KENDP saying that the site is not available any longer. Site options also cannot be extended into adjacent land.*

*Action:*

*The Call for Sites sub-group will progress the Draft Topic Paper with SODC and report to the next meeting.*

The meeting in March 2019 also reviewed the vote in principle to allocate a site. The minutes also illustrate the continued involvement with Aecom and SODC and that the Steering Group proactively request further information and clarity where advice is not clear. The following text is taken from the Steering Group minutes of March 2019 published on the KEPC website (document 10).

### **6. Housing Allocation**

*At the January meeting the Steering Group took a vote in principle to include a housing allocation in the NDP. This was in line with advice from SODC that the NDP would be considered more robust. Not everyone was present at the meeting, however more than 7 members voted including one Parish Councillor, which is line with requirements set out in the Terms of Reference.*

### **7. Site Option and Assessment Report and Facilitation Report**

*SODC have been asked to respond to a query made by the Steering Group to Aecom regarding land within the AONB area. The Steering Group are currently waiting for SODC to communicate with Aecom and await their and Aecom's response.*

*Locality have asked for feedback on the support package that was approved by them and delivered by Aecom.*

*Action:*

*Request further information on the purpose of this feedback from SODC.*

### **8. Discussion on skeletal topic paper from SODC**

*SODC have recommended that the Steering Group complete a topic paper explaining how all the information gathered to date has been obtained and considered, including the household survey, the Facilitation Report and the Site Option and Assessment Report. Concern was raised about the amount of work required to create a robust topic paper and whether this work duplicated the work needed to create the NDP itself. Concern that as the SODC local plan is only a draft document that the policies within this could change and this may subsequently make the topic paper out of date and not valid.*

*Action:*

*To ask SODC for details of who else has written a topic paper and to clarify the risk of writing one based on information available at the current moment in time compared to the risk of producing one at a later date or not having one at all.*

### **9. Process for providing the reports to Landowners**

*As part of the Call for Sites process the Steering Group have been advised by SODC that if a site is allocated within the NDP then the Site Option and Assessment Report should be published and then landowners would be asked for any comments. This has been delayed for two main reasons. The first is that the Steering Group do not have sufficient clarity from SODC regarding the skeleton topic report which is intended to set out the decision making process and related activities concerning housing and site allocation. Secondly, the group are awaiting further research from SODC. Without this information, the Steering Group are not in a position to move forward.*

**Action:**

*To continue to liaise with SODC regarding the outstanding information.*

**Final Summary:**

In summary, the Steering Group feel that the objections raised by the small group of residents to KEPC are unfounded. Proposed approaches, including the recommendation to allocate a site within the NDP, are the result of ongoing and complex conversations with consideration given not only to the expert views and advice of SODC and Aecom but also to the priorities and requirements of residents across the parish.

As we are all aware, the SODC emerging local plan 2034 is on hold and our NDP is being created in the context of the saved policies, the ratified local plan 2011, and the ratified core strategy 2012. Despite us not having all the answers, all of the group's activities, decisions and recommendations are based on the evidence we have to hand, and we continuously review and test this evidence. SODC and Aecom both provide independent advice, and at times their advice is not consistent, however, on the matter of the allocation of a small site their views are aligned: that on balance allocating will be more beneficial to the parish in the long term. Both bodies have extensive knowledge and experience of drafting neighbourhood plans, seeing them through the ratification process and following the future consequences of different types of plan. The Steering Group have listened to their independent views, considered them against the feedback provided by the community, and come to the view that, on the matter of allocation, we should follow their advice.

As a Steering Group we remain satisfied that our work on the NDP is comprehensive and robust. We are also satisfied that through our community engagements we have captured the priorities and requirements of our parish and that our approach represents the best way forward for the whole parish. We are also satisfied that our feedback channels such as the Household survey and the more recent community survey provide proof that the vast majority of residents support our approach and decisions to date. The next community event will give residents the opportunity to give feedback on our draft policies.

As mentioned previously, the parish council will be required to make a formal decision on the emerging NDP's preferred approach before the plan is presented to the local community for the pre-submission statutory consultation. Ultimately the community will decide whether the plan should be used to help determine planning applications at a local referendum.

**Kidmore End Parish Council Extraordinary Meeting, 1 July 2021 Review of the Regulation 15 draft of the Kidmore End NDP**

**Representation by the Steering Group to key points raised by members of the Keep Kidmore End Green group**

**1. Governance**

KKEG points: Questioning the objectivity of the three members of the Parish Council who are also full members of the NDP Steering Group and how they will be contributing to the review of the draft NDP before it is submitted to SODC and for independent review. Do their positions on both bodies comply with the principles published in Oxfordshire's Guide to Avoiding Bias in Decision Making?

*KENDP Steering Group: There are only 2 members of the Parish Council on the KENDP Steering Group and they are in attendance at this meeting but are not participating as parish councillors and will not be voting.*

KKEG: A sub-committee was formed to manage the Call for Sites process and Terms of Reference should have been established and minutes of their meetings should have been recorded.

*KENDP Steering Group: The call for sites members of the steering group supported the independent consultant who completed this part of the process. There are no separate terms of reference and the minutes of the progress of the call for sites process are within the minutes of the KENDP steering group. There are minutes of the facilitation meeting between Aecom, the call for sites group and planning officers from the NDP team at SODC.*

KKEG: Questions relating to the Call for Sites process.

*KENDP Steering Group: As part of the call for sites process an advert was placed in the Henley Standard and placed on the Kidmore End Parish Council website. The sites identified by the SODC SHELLA and HELLA (landowners who had put forward parcels of land within these processes to SODC) were also contacted when the email went out with the application form. This follows due process.*

*We do agree that there is a high probability that additional landowners in the parish might want to develop their land. Some landowners have chosen not to use the call for sites process as an avenue to do this as they realise that allocated sites are under closer control by the Housing Allocation policies within NDPs. So, for example, the development of the proposed site CFS8 will only be permitted if the site is limited to 0.2 hectares and the planning application is for 3 – 4 smaller houses.*

*The Steering Group is well aware that the threat of speculative development within the parish is far greater than the 207 dwellings that could be built if development was granted on all the green and amber sites from the call for sites process.*

*As you are aware, the proposed allocation is just for 3 – 4 houses.*

KKEG: Questions relating to the process followed by the Steering Group to vote on the inclusion of a site in the NDP.

*KENDP Steering Group: At the meeting referred to, members were asked if they were in agreement to vote on whether or not a housing allocation should be included in the NDP. At the meeting 6 members voted yes to an allocation and 2 decided to consider the allocation further. An action was recorded in the minutes that these remaining votes would be taken after the meeting, which is what happened. Overall, the majority of the Steering Group were in favour of including an allocated site. The vote related to whether or not to include an allocated site in principle and not which site this should be. Following the Regulation 14 consultation and further discussions with SODC about the pros and cons of an allocation, a more recent vote was taken, and the majority of the Steering Group have remained in favour of an allocation.*

KKEG: Ensure due process is followed

*KENDP Steering Group: The Steering Group agree with residents that the process followed and evidence gathered must be robust. We are confident that, under the guidance of SODC, this is the case.*

## **2. Transparency & communication**

KKEG: Unwillingness to allow the public to observe how key decisions are taken. Lack of a willingness to meet with those most directly affected by key aspects of the Plan.

*KENDP Steering Group: The membership of the steering group has been open from the beginning of the process. Over the 4 years it has taken to develop the NDP 18 volunteers across the parish have been involved, with the Steering Group having on average 12 members at any one time, the majority from Kidmore End. One member of KKEG was a member and resigned. Another member of KKEG asked for information and after a discussion decided not to join the group.*

*Agendas for the meeting and notes of the minutes are uploaded on to the KE parish council website as soon as possible. There has been a report at every parish council meeting from the NDP steering group.*

*We understand that residents living close to the proposed allocation might want to have separate discussions with the steering group, however, as we have explained to them before, in order to ensure transparency to all residents and landowners in the parish all meetings with members of the community need to be open to all community members and not just sub-groups. We have applied the same principles when approached by individual landowners.*

*The NDP is community led and reflects the views and preferences of the whole community. The NDP group have held more than the required number of events and consultations to ensure that feedback has been received from residents in every village in the parish and we believe that we are very clear on the community's views.*

## **3. Unintended consequences**

KKEG: There are no housing targets for the parish. Including CFS8 as an allocation sends a message to developers that the Parish Council is content for productive agricultural land within our AONB to be sold off for development. In the event that a planning application involving three or more houses to be built on a single site within the Parish other than CFS8 is approved by SODC prior to the Community Referendum, the Council should confirm there will no longer be a need to offer CFS8 for housing development as part of the Neighbourhood Plan.

*KENDP Steering Group: The KENDP steering group has been very open that a change happened near the beginning of the preparation of the neighbourhood plan and that there is currently no longer a requirement from the local authority for the neighbourhood plan to include a housing allocation. This aspect is explained in detail in the neighbourhood plan and the supporting documentation.*

*The National Planning Policy Framework confers a degree of protection to neighbourhood plans that contain housing allocations. This protection comes in the form of a Three Year Housing Land Supply test for our parish for a period of two years, provided the relevant criteria is met. This means that for a set period of time, we are not reliant on the district council maintaining a Five Year Housing Land Supply.*

*Currently SODC has a newly recorded housing supply of 5.33 years. However in a recent appeal in Sonning Common the inspector stated that the supply was 4.21. SODC dispute this and will be putting forward evidence to the contrary. However it shows how important this is. With a 5 year land supply the district is less likely to have large numbers of speculative developers coming forward, without it there will be.*

*The NPPF supports our proactive and positive approach and this is a very small allocation. The growth of the village of Kidmore End since 2011 is 1 dwelling, which is low compared to the other villages in the parish.*

*If development takes place elsewhere in the parish in the meantime, for example on infill or brownfield sites, this would not mean that the proposed allocation should be removed from the plan, as it is only planned growth that helps to provide protection against speculative development.*

*The allocation of a small area of agricultural land within the NDP does not set a precedent for further housing development on this or other agricultural land.*

*The KENDP steering group have kept the vision at the core of the plan. The inclusion of our NDP policies and the allocation is for the protection of the whole parish.*