



Joint Henley and
Harpsden
Neighbourhood Plan

Joint Henley and Harpsden Neighbourhood Plan

2020-2035

Consultation Statement

Submission Version

December 2021



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1. Introduction

- 1.1. This Consultation Statement has been produced to accompany the Henley and Harpsden Neighbourhood Plan. It sets out the process of consultation that has been undertaken in preparing the Neighbourhood Plan and how this has informed the submission version of the Plan.
- 1.2. This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Henley and Harpsden Neighbourhood Plan (JHHNP).
- 1.3. The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describes how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.4. The policies contained in the JHHNP are as a result of considerable interaction and consultation with the community and businesses within Henley and Harpsden. This consultation process has taken place over more than 2 years and has included surveys, public exhibitions and focus groups.

2. Background

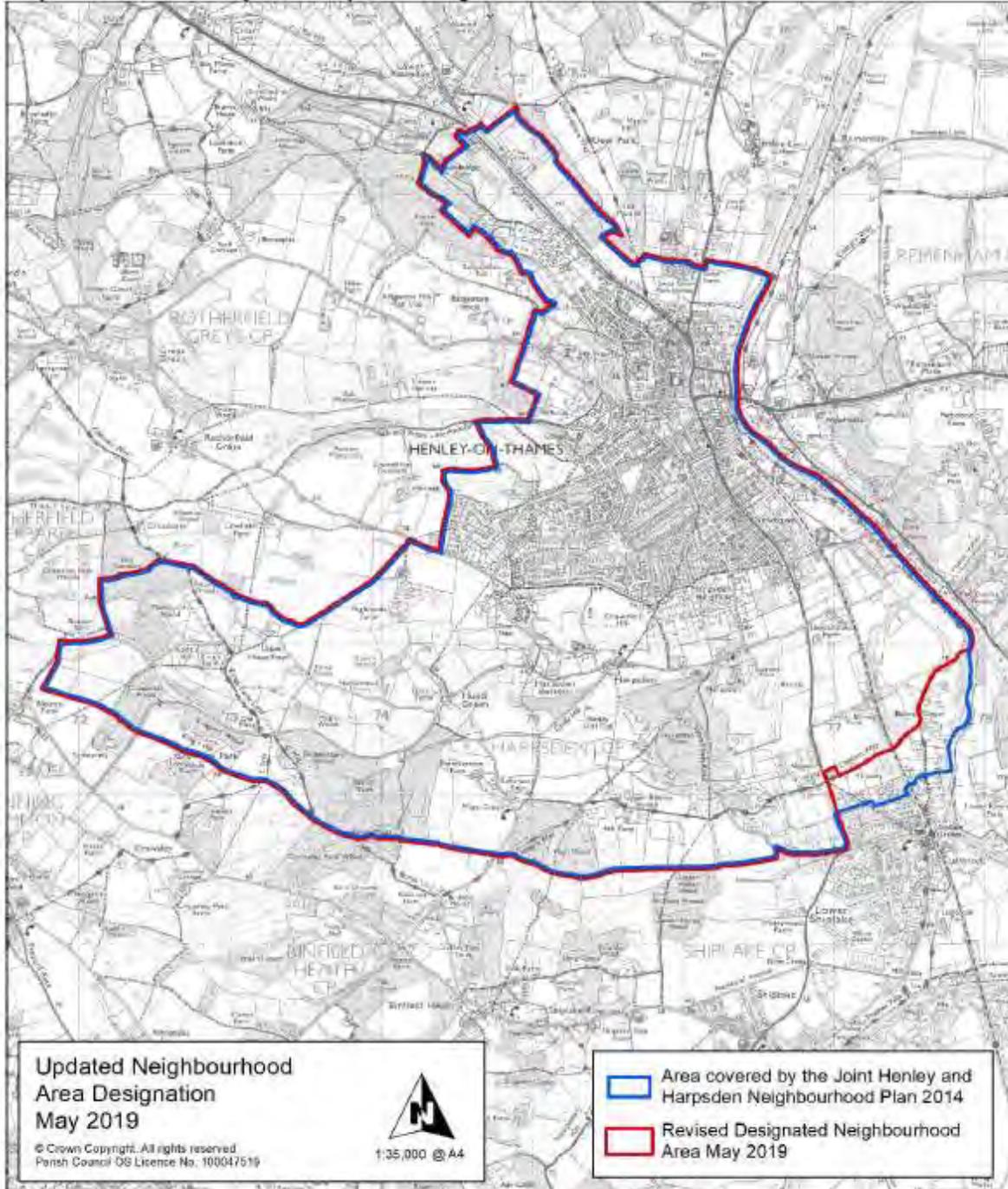
- 2.1. The decision to review the 2016 'made' Plan was approved on 26 February 2018 following a presentation by SODC officers. This was followed by a presentation by MP John Howell on 9 April 2018 to discuss the options available to Henley Town Council and Harpsden Parish Council.
- 2.2. The review was originally envisaged to be completed by January 2020 with a referendum planned for summer 2020. However, the review has taken considerably longer due to the delay in the adoption of the South Oxfordshire District Council Local Plan (Local Plan) and then COVID-19 having a direct impact on facilitating face-to-face community engagement.
- 2.3. The adoption of the Local Plan in December 2020 provided certainty to progress with drafting policies and choosing potential sites for development to meet the requirements set out in the Local Plan.
- 2.4. The requirements in the local plan include delivery of new homes and employment land, meeting affordable housing needs and addressing environmental issues such as air quality.
- 2.5. There is also a requirement in Policy H3 that the Neighbourhood Plan must have reached submission stage and allocated sufficient housing sites within 12 months of adoption of the

Local Plan, otherwise planning applications for housing in Henley will be supported provided that proposals comply with the remainder of the policies in the Local Plan. This has put considerable pressure on the Neighbourhood Plan Committee to make progress on the Plan over the last 12 months.

Designation of the neighbourhood area

- 2.6. In June 2013 South Oxfordshire District Council formally agreed the Neighbourhood Plan area boundary with Henley on Thames Town Council. This was in place for the 'made' Neighbourhood Plan which was adopted by South Oxfordshire District Council in April 2016.
- 2.7. The Neighbourhood Plan area was amended on 3 May 2019, due to a designation of Shiplake as a Neighbourhood Area to follow the parish boundary. This amendment required the Henley and Harpsden neighbourhood area boundary to be modified as it previously included part of the Shiplake Parish. The modified Henley and Harpsden neighbourhood area boundary is shown on map 1 below.

Map 1 Modified Henley and Harpsden Neighbourhood Area



3. Neighbourhood Plan Committee

3.1. It was agreed on 9 April 2018 to recruit at least 4 more members of the public to join the Committee, including additional representation from Harpsden. Henley Standard reported the search for more members to the Neighbourhood Plan Committee in spring 2018. The Members of each of the working groups were established in April 2018 (full list can be found in Appendix 1).

3.2. The Neighbourhood Plan Committee is currently made up of 14 Members (See Appendix A for current membership as of 05 November 2021). The membership and Terms of Reference can be found in the Appendix 1.

3.3. There have been 24 meetings to date and the Committee makes recommendations to the Planning Committee on Neighbourhood Plan matters. Meetings have been open to the public and since the 22 June 2020 have been streamed on YouTube. The agendas and minutes for all meetings are available on the Town Council Website: <https://www.henleytowncouncil.gov.uk/committees-and-meetings/agendas-minutes> and the JHHNP website: <https://jhhnp.org.uk/agendas-and-minutes>.

4. Aims when consulting on the revised JHHNP

4.1. The aims of the consultation process were:

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

4.2. Consultation was undertaken by Henley Town Council with the help of Community First Oxfordshire.

5. Summary of Engagement Activities

Timeline of events

Date	Activity
17 October 2018	Destination Henley event organised by the Henley Business Partnership where we shared the NP Review with the business community.
8 April 2020 – 15 May 2020	Strategic Environmental Assessment Scoping Consultation
20 August 2020 and 4 September 2020	Initial Focus Group to look at Issues Communication; Henley Herald, Website, Email to registered users, Facebook, Twitter and Instagram.
28 and 30 September and 1 October 2020	Online Presentations from site promoters Communication; Henley Herald and Standard, Website, Facebook, Twitter and Instagram.
12 November 2020	Climate Emergency Focus Group Communication; Henley Herald, Website, Email to registered users, Facebook, Twitter and Instagram.
December 2020 – January 2021	Neighbourhood Plan Survey Communication; Leaflet to every household in Henley and Harpsden. Henley Herald and Standard, Website, Newsletter, Facebook, Twitter and Instagram.
2 and 3 July 2021	Site options and draft policies exhibition and online. Static display and information available at Town Hall.

	Communication; Henley Standard, Henley Herald, Posters, Notice Board, Website, Email to registered users, Newsletter, Facebook, Twitter and Instagram.
July 2021	Transport Survey
	Communication; Email to stakeholders.
20 September 2021 – 16 November 2021	Pre-Submission Consultation (Regulation 14)
	Static display and information available at Town Hall during Drop in Sessions
	Communication; Leaflet to every household in Henley and Harpsden. Henley Herald and Standard, Posters, Notice Board, Website, Facebook, Twitter and Instagram. Email to registered users, landowners and statutory consultees.
14 July 2021 – 13 September 2021	Review of Statutory Consultee response and feedback from public. Edits and revisions made to Draft Plan.
8 December 2021	Submission to SODC.

Media and Public relations

Website

5.1. The Neighbourhood Plan has a dedicated Neighbourhood Plan website which was used throughout the process. Information on the consultations and a full list of agendas and minutes for all Neighbourhood Plan Committee meetings were also available on this website and the Town Council website.

Logo

5.2. A logo was developed to accompany all Joint Henley and Harpsden documents and press releases.

Facebook page

5.3. The Joint Henley and Harpsden Facebook page was established as part of the 2016 JHHNP and was used to publish information. The Henley Town Council Facebook page was updated through the process. It had 425 followers at 21 October 2021.

Twitter

5.4. The @HenleyTCM account has been updated throughout the process and had 3371 followers as of 21 October 2021.

Instagram

5.5. The Henley Town Council Instagram page was used through the process. It had 352 followers at 21 October 2021.

Press articles

5.6. Aspects of the emerging plan have been mentioned several times in the Henley Herald and Henley Standard. Appendix 3 contains examples of news articles published over this period.

Newsletter

5.7. A newsletter was sent out on three occasions during the process to members of Greener Henley, the Councils Transport Strategy Group and Neighbourhood Plan Committee.

Local Surveys

5.8. Survey Monkey – a dedicated online survey accompanied key public engagement throughout the process.

Meetings with SODC

5.9. South Oxfordshire District Council (SODC) – Regular meetings have taken place with SODC throughout the planning process.

6. Early discussions with stakeholders

Initial understanding of issues

- 6.1. The first step of engagement was to undertake a focus group, to understand the current and future issues affecting the Area, to help form the vision and objectives. Due to the Covid-19 pandemic, it was not possible to hold the usual face to face activities or public meetings. Therefore, in summer 2020, CFO sought participants for online (Zoom) Focus Groups.
- 6.2. All community groups in Henley and Harspden were mapped. They were then contacted by email and/ or phone, inviting their members/ users to participate in the Focus Groups. To reach the wider public, social media was used. A Press Release was also drafted for the Henley Herald, with an article subsequently published.
- 6.3. 20 people expressed an interest in taking part in the Focus Groups. They were asked to complete a short online questionnaire. This asked people to note the themes and subjects which interested them most (e.g. climate emergency, social and community infrastructure, housing and development, local services). This was to try to ensure a wide mix of participants and interests across the Focus Groups.
- 6.4. All 20 individuals were invited to take part in a Focus Group, with 15 subsequently signing-up to take part in two sessions:
- 20 August 2020: **7 participants** (out of 8 accepting the invitation)
 - 4 September 2020: **3 participants** (out of 7 accepting the invitation)
- Of the **10 total participants**:
- 6 female
 - 4 male
 - All 10 participants were aged 30+, with the majority aged 45+
- 6.5. The sessions were facilitated by Tom McCulloch (discussion lead) and Hilary Lombard (notetaker and summariser) from Community First Oxfordshire who helped to facilitate public engagement throughout the Plan process.
- 6.6. Discussion themes were not prescribed in advance. Community First Oxfordshire (CFO) did not want to dictate what people talked about but rather to encourage a free-flowing conversation, introducing discursive prompts now and then to follow-up certain points in more detail or invite comment about wider/ connected considerations.
- 6.7. Initial discussion made clear that the climate emergency was of prime importance to participants. It was recommended that two follow-up discussions/ Focus Groups were held on the following subjects: 1- **housing and development**; and 2- **the climate emergency**.

Climate Emergency Focus Group

6.8. 17 individuals signed-up to take part in a Focus Group on the Climate Emergency, with 15 subsequently attending the event on 12 November 2020. The key aims of the Focus Group were to:

- 2- Explore why participants think the Climate Emergency is an issue with which the Neighbourhood Plan refresh should engage; and
- 2- Investigate specific climate and low carbon measures which Neighbourhood Plan policies could seek to include.

6.9. It was clear that there were aspirations for the Plan to do more in relation to Climate Change issues and be more environmentally focussed.

7. Considering policy options

Neighbourhood Plan Survey

7.1. A survey was one of the key means of finding out what residents thought about a range of issues. The survey is an important part of the evidence base underpinning the Neighbourhood Plan, with the results helping to guide the next stage of plan-making.

7.2. The Neighbourhood Plan Survey (2020) was developed and drafted by the Steering Committee, supported by Community First Oxfordshire. The survey can be found in Appendix 2.

7.3. Between December 2020 - January 2021, a flyer publicising the household survey was delivered to every property in Henley and Harpsden. The deadline was originally 4 January 2021 but this got extended till the 8 February 2021 to increase participation. The survey could be completed on-line through Survey Monkey or completed on a hard copy and taken to the Henley Town Hall.

7.4. We received 771 survey responses and this helped to draw together the new vision and policies for the JHHNP.

7.5. The Committee considered that the outcome of this process was a clear confirmation of the approach issues that the Plan should cover. It was clear that the Plan has to cover a wide range of policy areas especially in relation to transport and the environment. The feedback received was then used alongside the evidence base to develop the vision, objectives and draft policies.

AECOM Support

7.6. In early 2021, the NPC drafted policies which were shared with consultants AECOM, who considered the conformity of policies with local authority level and national policy, guidance and evidence.

7.7. A meeting took place between the Neighbourhood Plan officers, SODC, OCC and AECOM (who were providing support on the policy and evidence base development). This took place on 13 January and involved discussing the draft transport and environmental policies.

The Evidence Base and Policy Development report was finalised on 31 March 2021. The recommendations of this report led to the re-drafting of policies and further evidence being commissioned including an addendum to the 2015 Transport Study. This report also recommended that a transport survey was undertaken to seek further evidence to support the proposed transport policies.

Transport Survey

7.8. A transport survey was undertaken in July 2021 to get a better understanding of what stakeholders thought about a range of issues. This was an important part of the evidence base underpinning the Neighbourhood Plan, with the results helping guide next stages of the transport policies. Stakeholders were asked to complete the online survey on behalf of their ENTIRE group, organisation or business, while being invited to consult with others before completing the survey. CFO, liaising with the NP Committee, prepared the survey content. The survey had 10 sections, covering the following themes:

- Introductory questions about your group or organisation
- Car travel
- Public transport
- Cycling
- Walking
- 20mph zone
- Parking
- Heavy goods traffic
- Air quality
- Transport implication of housing allocations in the South Oxfordshire District Council Local Plan 2035

7.9. The questionnaire can be found in Appendix 2.

Consultation relating to SEA

7.10. The Scoping Report was prepared for the SEA by consultants AECOM. Environment Agency, Natural England, Historic England and SODC were invited to comment on the content, in particular the evidence base for the SEA, the identified key issues and proposed SEA framework. The consultation took place between Wednesday 8th April 2020 and ends Friday 15th May 2020.

Altogether the information gathered during this time enabled further detail to be added to the draft Plan and the evidence base.

8. Considering site options

Sites Presentations

- 8.1. To continue the process of selecting possible sites for development, site promoters of sites put forward through the call for sites and those currently allocated in the JHHNP were invited to take part in a series of presentations at the end of September and early October 2020.
- 8.2. Ten site promoters presented their sites to the public and the Neighbourhood Plan Committee virtually on Zoom in a series of online sessions. The presentations were also streamed live on YouTube.
- 8.3. Residents who attended were given the opportunity to put questions to site developers. This process was helpful to find out more information about the proposals and to understand more about the potential benefits to the Town.

Site Assessment Exhibition

- 8.4. Holding face to face public engagement was important to the Committee. Following the sites presentations, they felt it was important to wait until an in person event could take place before making any decisions on preferred sites for allocation to be included in the Neighbourhood Plan .
- 8.5. An exhibition took place over two days in July 2021 to consider the site options for development and the draft policies. Site Promoters of 15 sites were invited to attend the exhibition and 13 attended to showcase proposals for each site and answer questions from the attendees.
- 8.6. Attendees were invited to view the AECOM site assessments and complete the Site Assessment Feedback Form which was formed by NPC and CFO with the support of SODC (See Appendix 1). Respondents were asked on a scale of 1-3 to set out what they thought the impacts of developing 15 potential sites were in relation to the impacts set out in AECOM's Site Assessments with regard to six key considerations: environmental; physical; accessibility; landscape and visual; heritage; and planning policy. There was also the opportunity to review the draft policies.
- 8.7. For those unable to attend the physical event, links to an online Site Assessment Consultation were widely publicised locally via local newspapers, social media, and direct emailing to community contact lists (residents, businesses, and community groups). People were invited to consider the site assessments on a dedicated Henley and Harpsden NP webpage and complete an online version of the Site Assessment Feedback Form by 12 July 2021. The presentations and YouTube videos from the developer presentations in September 2020 were available on the JHHNP website.

Response

- 219 Site Assessment feedback forms were received in hard copy and via the online survey.
 - For presentation of detailed results see pp. 8 - 38
- A number of representations which did not use the site assessment feedback form (online or hard copy) were also received. These have been collated separately to the Site Assessment Feedback form.
 - 9 representations from residents received by email before public consultation event.
 - 27 representations from residents received by email/ letter after public consultation event.
 - 1 representation received on behalf of a group of residents

Summary of key findings

- 8.8. The main thrust of comments regarding potential development in general was that brownfield development was preferable to greenfield, and that where development happens it should be to maximise affordable housing and minimise large, expensive housing. There were also concerns about development contributing to the coalescence of Henley, Harpsden, and Shiplake, and that development should consolidate the development of existing settlements and not materially change their character.
- 8.9. Longer-term sustainability of housing sites should also be a key consideration. There was also concern expressed about local infrastructure (such as parking and traffic) being inadequate to cope with new development, particularly in the locations which are most distant from Henley.
- 8.10. An increase in carbon emissions from new development was also expressed as a concern, plus a lack of emphasis on alternative, low carbon (non-car) methods of travel to access and connect sites. The opinion that new development should be premised on being carbon-neutral and increasing biodiversity was also expressed.
- 8.11. The need to avoid ribbon development, which may lead to further infill development behind such developments, was also stated, as was the importance of maintaining green gaps and local green spaces. Drainage, and the impact on local aquifers were also concerns, as were other potentially problematic ground conditions.
- 8.12. The comments received were considered by the Neighbourhood Plan Committee working group alongside the Site Assessment Evidence and additional site assessment criteria to determine the most suitable sites to be identified through the Draft Plan for allocation.



- 8.13. There is currently a petition to prevent development at Lucy's Farm and Gillotts Sports Field that has been signed by 2,282 people as of 5 November 2021.

Appropriate documents were then prepared for pre-submission consultation (Regulation 14) to commence in September 2021.

9. Pre-submission (Regulation 14) consultation

9.1. Public consultation on the pre-submission draft under Regulation 14 of the Neighbourhood Planning General Regulations 2012 ran from 20 September – 16 November 2021 for an eight-week period, having been extended to allow sufficient time to consider the statement of proposed modifications of 2016 JHHNP which was made available from the 5 October 2021. All relevant information and documents were available on the JHHNP website and in public places during this period 5 October – 16 November 2021.

9.2. In accordance with requirements of the Neighbourhood Planning regulations, relevant statutory consultees were notified. In addition, a range of individuals and organisations considered to have a particular interest in the Plan were also written to. A list of consultees – statutory and non-statutory - is contained in Appendix 4. A copy of the letter sent to the consultees is shown in Appendix 5.

9.3. Copies of the pre-submission plan were made available for public inspection during the consultation period at:

- Henley Town Hall
- Public Library, Henley
- Drop-In sessions at Henley Town Hall.

9.4. The pre-submission plan and the supporting evidence documents were published on the Neighbourhood Plan website from the 20 September 2021.

9.5. A leaflet was distributed to every household in Henley and Harpsden at the beginning of the consultation period to publicise the Regulation 14 Consultation and two drop-in sessions

which were held at Henley Town Hall on 15 and 16 October 2021. Ten posters were also displayed around Henley and five around Harpsden to advertise the drop-in Sessions.

9.6. 101 people attended the drop-in sessions and members of the Neighbourhood Plan Committee and officers were available to answer questions. A1 Boards displayed information on the consultation, setting out the policies and the proposed development sites.

9.7. Members of the NPC also attended an Eco Fair organised and promoted by the District Council which took place on 22 September 2021.



9.8. A number of comments were received from statutory consultees including the South Oxfordshire District Council (SODC), Oxfordshire County Council (OCC) and Network Rail who raised suggested amendments around policy wording. Responses were also received from Natural England and the Chilterns AONB Conservation Board who raised concern over the proposed development at Policy DS7 North Field of Highlands Farm. The Coal Authority, National Grid, Scottish and Southern Energy Power and the Environment Agency responded with no suggested amendments. NHS Oxfordshire Clinical Commissioning Group supported the primary objective S04.

9.9. Representations were received from local groups and organisations including a signed petition against development on Gillotts School Playing Fields and Lucy's Farm and comments from Henley Community Land Trust.

9.10. Additional comments were also received from landowners or their representatives commenting on the site selection process and proposed site allocations.

- 9.11. As a result of these responses, following the end of the Regulation 14 consultation, a number of amendments were made to the draft Plan including:
- Updating policy and supporting information
 - Updating objective T02 in line with comments received from OCC.
 - Updating the mapping in the Plan
 - Updating information in the Baseline Report
 - Providing further information on the site selection process and justification for site allocations.
- 9.12. Some comments were received from landowners objecting to proposed local green space designations. Where this applied to private land forming part of the curtilage garden area, these sites have generally been removed and are no longer being proposed for LGS designation.
- 9.13. 62 responses were received from individuals, the principal issues raised by the local community related to Policy DS3; development at Gillott's Playing field (over half of respondents raised this as an issue) and concern over the high traffic levels that currently exist in Henley. Some individuals were also concerned about the impact on schools and doctors as a result of new development and around 10% were concerned about development at Northern Field at Highlands Farm. There were comments about air quality, development on greenfield land and whether the promotion of cycling, walking and public transport would provide a practical solution for the Neighbourhood Area. Support was received for an HGV Ban and Electric Charging Points. The need for affordable housing was highlighted by some and the need for parking across the Town. Some individuals questioned the need for allocating additional retail space.
- 9.14. A number of changes were made to the Plan in response to the issues raised by the local community, however most of the representations were statements rather than suggested changes.
- 9.15. A detailed summary of the responses to the Regulation 14 stage comments is set out in Appendix 7.

10. Conclusion

- 10.1. The publicity, engagement and consultation undertaken to support the preparation of the revised Joint Henley and Harpsden Neighbourhood Plan has been open and transparent, with many opportunities provided for those that live, work, and do business within the Neighbourhood Area to contribute to the process, make comment, and to raise issues, priorities and concerns.
- 10.2. All statutory requirements have been met and a significant level of additional consultation, engagement, and research has been completed.
- 10.3. This Consultation Statement has been produced to document the consultation and engagement process undertaken and are considered to comply with Part 5, Section 15 of the Neighbourhood Planning (General) Regulations 2012.

Appendix 1 – Neighbourhood Plan Committee Terms of Reference

NEIGHBOURHOOD PLAN COMMITTEE

TERMS OF REFERENCE

1. Membership

- 1.1 The Committee shall consist of at least 3 Henley Town Councillors (to include the Chair of Planning Committee ex-officio), 2 Harpsden Parish Councillors and at least 6 co-opted members of the public with previous involvement in the development of the Joint Henley and Harpsden Neighbourhood Plan (JHHNP).

2. Purpose

- 2.1 The Committee's role will be:
- i) to strengthen, review and ensure governance of the delivery of the JHHNP
 - ii) to review the delivery of the JHHNP in line with the adopted South Oxfordshire Local Plan 2035
 - iii) to review the JHHNP

3. Quorum

- 3.1 Quorum shall be at least 3 Henley Town Councillors or Harpsden Parish Councillors, or any combination of councillors.

4. Election of Chair

- 4.1 A Chair (who should be a Councillor) and Vice Chair shall be elected at Planning Committee.

5. Remit

- 5.1 The Neighbourhood Plan Committee reports to Planning Committee. All recommendations will be reported to Planning Committee for consideration.
- 5.2 The Neighbourhood Plan Committee will meet as called by the Chair.
- 5.3 The Neighbourhood Plan Committee has budget responsibility for up to £5000 for planning consultancy advice and delegated powers only as set out in Paragraph 5.4 below.
- 5.4 On matters that require further research, for example requesting a more detailed report or seeking clarification from third parties on a specific item, then the Neighbourhood Plan Committee shall have a delegated power to act.
- 5.5 The Neighbourhood Plan Committee may co-opt members and liaise with a community panel as they so wish.

Neighbourhood Plan Committee Membership

Chair, Councillor Ken Arlett – Henley Town Council (HTC)
Vice Chair, Councillor Laurence Plant – HTC
Councillor Ian Clark – HTC
Councillor Glen Lambert – HTC
Councillor Michelle Thomas – HTC
Councillor Kester George – Harpsden Parish Council (HPC)
Councillor Matt Leeman – HPC
Don Barraclough
Rebecca Chandler-Wilde
Joan Clark
Patrick Fleming
Geoff Lockett
Jackie Walker
David Whitehead

Working Groups

- Schools, Colleges, Doctors' Surgeries, Utilities etc. - Rebecca Chandler-Wilde and Councillor Michelle Thomas
- Libraries, Community Halls, Sports and Leisure Facilities – Joan Clark
- Transport - Patrick Fleming, Don Barraclough, Geoff Lockett, Councillor Kester George, Jackie Walker
- Car Parks - Councillor Ken Arlett and Geoff Lockett
- New Housing, Permitted Development Rights since March 2017 – David Whitehead, Rebecca Chandler Wilde, Councillor Kester George and Councillor Michelle Thomas
- Business and Community Engagement – Rebecca Chandler-Wilde, Jackie Walker, Patrick Fleming and Councillor Ken Arlett
- Review all existing sites - Councillor Ken Arlett, Councillor Kester George, Councillor Ian Clark
- Industrial Land – Councillor Ken Arlett, Councillor Ian Clark, Councillor Matthew Leeman
- Site Selection – Councillor Ken Arlett, Councillor Kester George, Councillor Michelle Thomas and Joan Clark

NEIGHBOURHOOD PLAN AND HOUSING NEEDS SURVEY

Introduction

YOUR COMMUNITY, YOUR VOICE

Henley Town Council and Harpsden Parish Council are updating the 2016 Neighbourhood Plan. This presents a powerful opportunity for local people to shape the future of our communities.

The Plan will set out the challenges we face regarding major issues such as housing and development, climate change and the environment, community facilities and services, and roads and transport. It will offer a vision, objectives, and policies for dealing with these. The Plan is the most useful tool that we have in the box if we want to have a strong say over the big issues facing us.

The Plan will be based on consultation and discussion and subject to a local referendum.

WHY A SURVEY?

This survey is an important part of making The Plan. The Committee who will be drafting policies for the Plan need to understand what residents of Henley and Harpsden think about and want in relation to key issues.

HOW DOES IT WORK?

To keep it simple, we're asking for one response per household rather than one per person. Please try to answer all questions. The survey should take about 15 minutes to complete, and there's space for comment at the end.

IS IT CONFIDENTIAL?

Yes – the survey is being undertaken on behalf of the Neighbourhood Plan Committee by a local community development charity called Community First Oxfordshire (CFO).

Your data will be processed by CFO in accordance with the General Data Protection Regulation (2018). Your data will not be shared with any organisation, including the Neighbourhood Plan Committee. However, the survey does invite you to leave your contact details in relation to two specific subjects. CFO will provide a summary report on survey findings for the Committee.

The deadline for completion of the survey is 11 January.

MANY THANKS FOR YOUR TIME - HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN COMMITTEE

**Please return the completed survey to Henley Town Hall by the
end of 11 January 2021**

The Vision of the Revised Henley and Harpsden Neighbourhood Plan

4. How would you like Henley and Harpsden to be described in 15 years?

Please tick as many as you like.

- | | |
|---|--|
| <input type="checkbox"/> Accessible | <input type="checkbox"/> Sophisticated |
| <input type="checkbox"/> Affordable | <input type="checkbox"/> Traditional |
| <input type="checkbox"/> Attractive | <input type="checkbox"/> Tranquil |
| <input type="checkbox"/> Friendly | <input type="checkbox"/> Plastic-Free |
| <input type="checkbox"/> Haven for wildlife | <input type="checkbox"/> Vibrant |
| <input type="checkbox"/> Net zero carbon | <input type="checkbox"/> Unchanged |
| <input type="checkbox"/> Prosperous | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Safe | |

Other (please specify)

5. How much does your household value these town and village characteristics?

1 = not valuable at all, 5 = very valuable

	1 - not valuable at all	2	3	4	5 - very valuable
Footpath network	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Setting in a rural landscape	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mix of buildings of different ages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Number/ location of trees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Historical buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local architectural styles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Open green spaces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The river setting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to the countryside	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other: please tell us below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

New Housing

6. What are the most important considerations regarding the landscape and community setting of new housing development?

1 = not important at all, not a priority, 5 = very important, top priority

	1 - not important at all	2	3	4	5 - very important
In keeping with local housing character	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Proximity to existing local amenities/facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventing loss of high-quality farmland	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising impact on landscape and views	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising environmental impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limiting the potential of flooding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pedestrian and cycle access	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public transport links	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimising road and traffic impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other: please tell us below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

7. What are the most important considerations regarding the design and layout of new housing development?
 1 = not important at all, not a priority, 5 = very important, top priority

	1 - not important at all	2	3	4	5 - very important
Height limits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sufficient off-road parking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Good quality build materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local design style/materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modern/ innovative design	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allowing for higher density housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Keeping housing density in line with nearby development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maximising low carbon build and design standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communal greens and open spaces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Space for home working	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Suitable for the elderly and those with limited mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other: please tell us below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

8. Would you be interested in exploring Community-led Housing approaches to delivering the homes that local people need?

Community-led housing is about local people playing a leading and lasting role in solving housing problems, creating genuinely affordable homes and strong communities. It is usually achieved through a community led organisation being established.

- Yes
- No
- Maybe

9. If you are interested in finding out more, please leave your contact details below if you consent for CFO to follow up.

Name

Email Address

Phone Number

The Environment

10. Do you think the Neighbourhood Plan should do more to conserve and enhance nature and wildlife in Henley and Harpsden?

- Yes
 No
 Maybe

11. If YES, how do you think could this be achieved?

Please tick as many as you like.

- | | |
|--|--|
| <input type="checkbox"/> More tree planting | <input type="checkbox"/> Provide wildlife corridors and connections between green spaces |
| <input type="checkbox"/> More planting of native plant species | <input type="checkbox"/> List Priority Habitat Broadleaf Woodland for preservation |
| <input type="checkbox"/> More bee-friendly planting | <input type="checkbox"/> List green open spaces for preservation |
| <input type="checkbox"/> Reduction in verge and grass cutting | <input type="checkbox"/> More ponds |
| <input type="checkbox"/> Reduction in pesticide use | <input type="checkbox"/> Community orchard |
| <input type="checkbox"/> Develop a Nature and Wildlife Action Plan | <input type="checkbox"/> Other: please tell us below |

Other (please specify)

12. Do you think green spaces in Henley and Harpsden need to be improved, IN GENERAL?

- Yes
 No
 Maybe

13. Do you think that the following green spaces should be protected or enhanced?

Please tick as many as you like.

- Community orchard (between Leaver Road and Paradise Road)
- Chalk Bank (alongside Dearfield Road/Valley Road)
- Drawback Hill
- Mill Meadows
- Marsh Meadows
- Makins Recreation Ground
- Freemans Meadow
- The Town Green (Gillotts Corner)
- Other: please tell us below

Other (please specify)

14. Do you think that the following woodland should be protected or enhanced?

Please tick as many as you like.

- Parkside
- Herley College (Rotherfield)
- Watermans Spinney
- Gillotts School (Peppard Lane)
- Other woodland: please tell us where

Other (please specify)

15. Are you concerned with air and light pollution?

- Yes
- No
- Not really

16. If YES, tell us where air and light pollution is a concern to you?

Please tick all that apply.

- Greys Road
- Reading Road
- Duke St
- Bell St
- New St
- Hart St
- The Bridge
- Other: please tell us where

Other (please specify)

17. Do you think access to the countryside should be improved?

- Yes
- No
- Maybe

18. If YES, how do you think access to the countryside could be improved?

Please tick as many as you like.

- Improve and repair existing public rights of way (e.g. drainage, styles, bridges, walkways)
- Ask for access as a condition of planning permission
- Seek to develop the public rights of way network (e.g. new paths)
- Provide more cycle ways
- Improve signage and information boards
- Other: please tell us below
- Work with landowners to establish permitted paths

Other (please specify)

Making new development as sustainable as possible

Henley Town Council has declared a climate emergency and understands that climate change is a big threat to the future of our society. Dealing with its implications has to be at the heart of our Neighbourhood Plan.

Currently, national legislation imposes a duty on councils to ensure that local planning policies contribute to emissions reduction targets. The emerging South Oxfordshire Local Plan includes policies on carbon reduction and is expected to be adopted soon.

19. Tell us what you think about ways in which new development can minimise climate change and adapt to its effects.

1 = *strongly disagree*, 5 = *strongly agree*

	1 - strongly disagree	2	3	4	5 - strongly agree
New buildings should provide as much renewable energy as possible from built-in or on-site sources.	<input type="radio"/>				
New buildings should be highly energy efficient / carbon neutral, minimising the need for heating and cooling	<input type="radio"/>				
New buildings should be highly sustainable in design and construction, using sustainable materials with low embodied energy.	<input type="radio"/>				
Through their design, layout and landscaping, new buildings should be resilient to overheating during heat waves	<input type="radio"/>				
New buildings should have facilities for drying laundry outside	<input type="radio"/>				
New buildings should have secure, weatherproof weather bike storage, usable by all.	<input type="radio"/>				
New developments should have charging infrastructure for electric cars	<input type="radio"/>				

	1 - strongly disagree	2	3	4	5 - strongly agree
New buildings should incorporate green roofs and walls to help reduce flooding and to reduce heat extremes	<input type="radio"/>				
New buildings should provide wildlife habitat (e.g. bat and bird boxes)	<input type="radio"/>				
New development should use natural drainage systems (e.g. soakaways, ponds and ditches) to help reduce flooding and provide wildlife habitat.	<input type="radio"/>				
New development should maximise green spaces	<input type="radio"/>				
New development should provide wildlife corridors and connections between green spaces	<input type="radio"/>				
Other: please tell us below	<input type="radio"/>				
Other (please specify)	<input type="text"/>				

20. Do you think the Neighbourhood Plan should give support to the production of renewable energy, to make our town more self-sufficient and capture energy spending in our local economy?

1 = *strongly disagree*, 5 = *strongly agree*

1 - strongly disagree	2	3	4	5 - strongly agree
<input type="radio"/>				

21. What forms of renewable energy would you support in principle?

Please tick all that apply.

- | | |
|---|--|
| <input type="checkbox"/> Roof based solar panels | <input type="checkbox"/> Geo-thermal energy generation |
| <input type="checkbox"/> Commercial scale solar farms | <input type="checkbox"/> District heating |
| <input type="checkbox"/> Micro-hydro projects | <input type="checkbox"/> Ground source heat pumps |
| <input type="checkbox"/> Wind turbines | <input type="checkbox"/> Air source heat pumps |
| <input type="checkbox"/> Anaerobic digestion | <input type="checkbox"/> Other; please tell us below |
| <input type="checkbox"/> Energy from waste | |

Other (please specify)

Roads, Transport, and Movement

22. What forms of transport do you most frequently use?

Please rank in order of frequency used: 1 = most used, 2 = 2nd most used, etc. and select N/A for any that don't apply.



Car

N/A



Bus

N/A



Train

N/A



Shared bike scheme

N/A



Car Club

N/A



Walking

N/A



Cycling

N/A



Other

N/A

23. If you chose 'other' for Q22, please tell us what type of transport.

24. Which of the following methods of transport would you like to make use of more often?

Please tick all that apply.

Bus

Walking

Train

Cycling

Shared bike scheme

Other; please tell us below

Car Club

Other (please specify)

25. If applicable, what prevents you using the bus more?

Please tick all that apply.

Inconveniently located stops

Reliability of services

Inconvenient routes

Cost

Frequency of services

Other; please tell us below

Other (please specify)

26. If applicable, what prevents you using the train more?

Please tick all that apply.

- | | |
|--|--|
| <input type="checkbox"/> Inconvenient routes | <input type="checkbox"/> Cost |
| <input type="checkbox"/> Frequency of services | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Reliability of services | |

Other (please specify)

27. If applicable, what prevents you using the shared bike scheme more?

Please tick all that apply.

- | | |
|---|---|
| <input type="checkbox"/> I haven't heard about the scheme | <input type="checkbox"/> I am nervous about riding a bike on our busy roads |
| <input type="checkbox"/> It is too complicated to use | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> I already have a bike | |

Other (please specify)

28. If applicable, what would prevent you using a car club?

Please tick all that apply.

- | |
|--|
| <input type="checkbox"/> Too complicated to use |
| <input type="checkbox"/> I already belong to a private car sharing group |
| <input type="checkbox"/> I can use my own car |
| <input type="checkbox"/> Other: please tell us below |

Other (please specify)

29. If applicable, what prevents you walking and cycling more?

Please tick all that apply.

- | | |
|--|---|
| <input type="checkbox"/> Physical health | <input type="checkbox"/> Poor state of repair of pavements and foot/cycle-paths |
| <input type="checkbox"/> Feeling unsafe | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Poorly lit pavements and foot/cycle-paths | |

Other (please specify)

30. What are the issues you feel need addressing in respect of roads and lanes in Henley and Harpsden?

Please tick all that apply.

- | | |
|--|---|
| <input type="checkbox"/> Potholes | <input type="checkbox"/> Dangerous road crossings |
| <input type="checkbox"/> Poor state of repair in general | <input type="checkbox"/> Pavements and road crossing points are very difficult for wheelchair/pushchair users |
| <input type="checkbox"/> Pavements are too narrow | <input type="checkbox"/> Air pollution and vibrations from Heavy Goods Vehicles |
| <input type="checkbox"/> Cycling feels unsafe | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Need to provide more cycling routes | |

Other (please specify)

31. How could accessibility for cyclists and pedestrians be improved in Henley town centre?

Please tick all that apply.

- | | |
|---|--|
| <input type="checkbox"/> Pedestrianised areas | <input type="checkbox"/> More off-road footpaths |
| <input type="checkbox"/> Cycle lanes | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Better quality pavements | |

Other (please specify)

32. Are there any locations that you would like to see more cycle parking?

Please tick all that apply.

- | | |
|-------------------------------------|--|
| <input type="checkbox"/> Bell St | <input type="checkbox"/> Riverside |
| <input type="checkbox"/> Hart St | <input type="checkbox"/> Thames Side |
| <input type="checkbox"/> Duke St | <input type="checkbox"/> Station Rd |
| <input type="checkbox"/> Reading Rd | <input type="checkbox"/> All car parks |
| <input type="checkbox"/> Friday St | <input type="checkbox"/> Other: please tell us where |
| <input type="checkbox"/> New St | |

Other (please specify)

Local Economy, Services, and Infrastructure

33. How satisfied are you with local services and amenities in Henley and Harpsden, IN GENERAL?

1 = not satisfied at all; 5 = very satisfied

1 - not satisfied at all 2 3 4 5 - very satisfied



34. Do you have concerns with the provision and availability of health care services in Henley and Harpsden, IN GENERAL?

- Yes
- No
- Sometimes

35. If YES, what are your concerns?

Please tick all that apply.

- Difficulty in getting an appointment
- Difficulty in getting to medical appointments
- Difficulty accessing some of the services by telephone (e.g. physiotherapy, podiatry)
- Other: please tell us below

Other (please specify)

36. What sports, leisure, and entertainment facilities would you like to see more of in Henley and Harpsden area?

Please tick as many as you would like.

- | | |
|---|--|
| <input type="checkbox"/> Expand and improve facilities at existing clubs and venues | <input type="checkbox"/> Gyms |
| <input type="checkbox"/> Football | <input type="checkbox"/> Cinemas |
| <input type="checkbox"/> Cricket | <input type="checkbox"/> Theatres |
| <input type="checkbox"/> Rugby | <input type="checkbox"/> Arts venues (non theatre) |
| <input type="checkbox"/> Tennis | <input type="checkbox"/> Music venues for smaller gigs |
| <input type="checkbox"/> Hockey | <input type="checkbox"/> Music venues for large concerts |
| <input type="checkbox"/> Badminton | <input type="checkbox"/> Heritage attractions |
| <input type="checkbox"/> Squash | <input type="checkbox"/> Wildlife attractions |
| <input type="checkbox"/> Swimming | <input type="checkbox"/> Museums |
| <input type="checkbox"/> Bowling | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Golf | |

Other (please specify)

37. Before the pandemic, where did you normally work?

- At home
- Elsewhere in Henley
- Elsewhere in Harpsden
- Other location

38. Has COVID-19 impacted on your working arrangements?

- No change at all
- Yes - minor changes
- Yes - major changes

39. If COVID-19 has had a major effect on your working arrangements, please tell us how.

- Working from home
- Made unemployed
- On reduced hours
- Other: please tell us below

Other (please specify)

40. If COVID-19 HAS impacted on your working arrangements, do you think these are long-term changes?

- Yes
- No
- Maybe

41. If you commute to work, please tell us where you travel to.

- | | |
|---|---|
| <input type="checkbox"/> Within Henley and Harpsden | <input type="checkbox"/> Wallingford |
| <input type="checkbox"/> Reading | <input type="checkbox"/> Marlow |
| <input type="checkbox"/> London | <input type="checkbox"/> High Wycombe |
| <input type="checkbox"/> Oxford | <input type="checkbox"/> Maidenhead |
| <input type="checkbox"/> Abingdon | <input type="checkbox"/> Slough |
| <input type="checkbox"/> Didcot | <input type="checkbox"/> Other – please tell us where |

Other (please specify)

Your Household's Housing Needs

42. Are you or anyone from your household likely to need more suitable housing in the next ten years? For example, because of affordability, accessibility, security of tenure or size.

Yes

No

43. When would you need to move into this new home?

- Now Between 3-5 years
 Within the next 12 months Between 5-10 years
 Between 1-3 years

44. Why does your household need a new home?

Please choose all that apply.

- | | |
|--|--|
| <input type="checkbox"/> Want to start first home | <input type="checkbox"/> To be near family |
| <input type="checkbox"/> Want to buy a new home but can't afford it | <input type="checkbox"/> To give or receive family support |
| <input type="checkbox"/> Want to rent a new home but can't afford it | <input type="checkbox"/> To be near work |
| <input type="checkbox"/> Can't afford current rent | <input type="checkbox"/> Retiring |
| <input type="checkbox"/> Can't afford current mortgage | <input type="checkbox"/> Want to build own home |
| <input type="checkbox"/> Lower household energy bills | <input type="checkbox"/> Moved away and wish to return to the area |
| <input type="checkbox"/> Need bigger home | <input type="checkbox"/> Need older persons' accommodation |
| <input type="checkbox"/> Need smaller home | <input type="checkbox"/> Need a specially adapted home |
| <input type="checkbox"/> Special needs | <input type="checkbox"/> Due to COVID-19 |
| <input type="checkbox"/> Tenure insecure | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Job insecurity | |

Other (please specify)

45. How many people of each age group would live in the new home (include carers if support needed to live independently)?

Please choose the number for each group.

	1 person	2 people	3 people	4+ people
Under 18	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
18 -24	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
25 - 44	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
45 - 64	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
65 - 74	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
75+	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

46. Do you live in:

- Henley
- Harpsden
- Other - please tell us where

Other (please specify)

47. How many years have you lived there?

	Less than 3	3-5	5-10	10-20	20+
Henley	<input type="radio"/>				
Harpsden	<input type="radio"/>				
Other	<input type="radio"/>				

48. If you DO NOT live in Henley or Harpsden, tell us about your local connections.

Please choose all that apply.

- Work there
- Used to live there
- Parents or children live there

49. What type of house do you currently live in?

- Detached house
- Semi-detached house
- Terraced house
- Flat/apartment
- Bungalow
- Part of converted/shared house
- In a commercial building
- Other: please tell us below

Other (please specify)

50. How many bedrooms does your current home have?

- 1
- 2
- 3
- 4+

51. Who owns the home you live in now?

- Self (with or without mortgage)
- Parents/relatives
- Private rented
- Rented from Housing Association
- Part rent-part buy with a Housing Association (shared ownership)
- Tied to job
- Other: please tell us below

Other (please specify)

52. If you are currently renting, do you do this out of choice or is it because you can't afford to buy a new home?

- Choice
- Want to buy a new home but can't afford it

53. Have any members of your household left Henley or Harpsden in the last 5 years?

- Yes
- No

54. If YES, how many people have left in the last 5 years?

55. Why did they leave?

Please tick all that apply.

- Employment
- Further education
- Lack of suitable housing
- Lack of affordable housing
- Got married/moved in with partner
- Other: please tell us below

Other (please specify)

56. Would they return if their housing needs could be met in Henley or Harpsden?

- Yes
- No
- Maybe

57. What type of home would best meet your needs?

- | | |
|---|--|
| <input type="radio"/> Detached house | <input type="radio"/> Bungalow |
| <input type="radio"/> Semi-detached house | <input type="radio"/> Part of converted/shared house |
| <input type="radio"/> Terraced house | <input type="radio"/> In a commercial building |
| <input type="radio"/> Flat/apartment | <input type="radio"/> Other: please tell us below |

Other (please specify)

58. Which of the following would be best for you?

Please tick all that apply.

- | | |
|--|--|
| <input type="checkbox"/> Housing for sale at a lower price | <input type="checkbox"/> Starter home |
| <input type="checkbox"/> Shared ownership (part-rent/part-buy) | <input type="checkbox"/> Self-build |
| <input type="checkbox"/> Private rented housing | <input type="checkbox"/> Other: please tell us below |
| <input type="checkbox"/> Affordable rented housing (e.g. from a Housing Association) | |

Other (please specify)

59. How many bedrooms would your new home need?

60. Does anything affect the type of home you need?

Please choose all that apply.

- | |
|--|
| <input type="checkbox"/> No |
| <input type="checkbox"/> Yes - limited mobility |
| <input type="checkbox"/> Yes - wheelchair used |
| <input type="checkbox"/> Yes - other care/support need (please describe below) |

Other (please specify)

61. Does anyone in your household have a specialist housing need? If so, what type do they require?

Please choose all that apply.

- | | |
|---|--|
| <input type="checkbox"/> No | <input type="checkbox"/> Yes - residential care |
| <input type="checkbox"/> Yes - ground floor accommodation | <input type="checkbox"/> Yes - supported living for an adult with learning disabilities who wants to live independently in a home of their own |
| <input type="checkbox"/> Yes - sheltered housing | <input type="checkbox"/> Yes - other (please describe below) |
| <input type="checkbox"/> Yes - extra-care housing | |

Other (please specify)

62. What is the TOTAL annual income for the household looking to move into a new home (before tax and deductions)?

- | | |
|-------------------------------------|--|
| <input type="radio"/> Less than 10k | <input type="radio"/> 60 - 80k |
| <input type="radio"/> 10 - 15k | <input type="radio"/> 80 - 100k |
| <input type="radio"/> 15 - 20k | <input type="radio"/> 100k+ |
| <input type="radio"/> 20 - 40k | <input type="radio"/> Prefer not to answer |
| <input type="radio"/> 40 - 60k | |

63. If you are interested in owning a house, how much do you think you would be able to put down as a deposit?

- | | |
|-------------------------------------|--------------------------------|
| <input type="radio"/> None | <input type="radio"/> 20 - 30k |
| <input type="radio"/> Less than 10k | <input type="radio"/> 30 - 50k |
| <input type="radio"/> 10 - 20k | <input type="radio"/> 50k+ |

64. Are you registered on the South Oxfordshire District Council Housing Register?

- Yes
 No

65. Please leave a contact email and/or phone number below if you consent for Community First Oxfordshire (CFO) to get in touch to explore your housing needs in more detail.

Name	<input type="text"/>
Email Address	<input type="text"/>
Phone Number	<input type="text"/>

Any Other Comments

66. Do you have any other comments on the review of the Neighbourhood Plan for Henley and Harpsden?

**Please return the completed survey to Henley Town Hall
by the end of 11 January 2021**

Henley and Harpsden Neighbourhood Plan

Site Assessment Consultation - Feedback Form

As set out in the South Oxfordshire District Council Local Plan, there are around a further 200 houses planned for development in Henley. The Neighbourhood Plan intends to allocate housing sites to meet the outstanding requirement of between 50 and 115 houses. The NP committee wants to know what the community thinks about the development of specific sites to help guide the decision on which ones to allocate.

The NP committee recently commissioned an independent consultant (AECOM) to undertake detailed assessments on potential development sites, setting out the potential impacts of developing each.

You can read these assessments in the [Site Assessment Document](#) which you have been given along with this feedback form. Please use this document to help guide your feedback.

Please note that some of the sites listed are in the existing Neighbourhood Plan for a different proposal. These are marked in the tables below.

On a scale of 1-3, please tell us what you think about the impacts of developing each site in relation to the impacts set out in the Site Assessment Document with regard to six key considerations listed in the tables below.

1 = same/ less impact than assessed, 2 = somewhat more impact than assessed, and 3 = significantly more impact than assessed.

IMPORTANT INFORMATION ABOUT HOW WE WILL PROCESS YOUR COMMENTS

The analysis of your feedback will be undertaken on behalf of the Neighbourhood Plan Committee by Community First Oxfordshire (CFO), a community development charity. By completing this survey you are consenting for your response data to be shared by Community First Oxfordshire and Henley Town Council. Your data will be processed by CFO and Henley Town Council in accordance with the General Data Protection Regulation (2018). You can read CFO's Privacy Policy at <https://www.communityfirstoxford.org/privacy-policy/> and Henley Town Council's Privacy Policy at <https://www.henleytowncouncil.gov.uk/compliance/privacy>. CFO will provide a summary report on survey findings for the NP Committee.

However, CFO or the NP committee would like to be able to contact you to follow up your survey responses and/ or to alert you to future Plan consultations. **Therefore, please confirm whether you agree to the statements below by ticking the box after each.** You can still complete this survey **WITHOUT** leaving your details.

I consent to being contacted by CFO or Henley Town Council with regard to my survey response.	<input type="checkbox"/>
I consent to being contacted by CFO or Henley Town Council with regard to future Neighbourhood Plan consultations.	<input type="checkbox"/>

YOUR CONTACT DETAILS

Name		
Address		
Email/ telephone		
Are you commenting as a private individual or as the representative/ on behalf of an organisation or group? <i>Please tick one box.</i>	<input type="checkbox"/>	<input type="checkbox"/>
	PRIVATE	ORGANISATION/ GROUP
If applicable, please tell us which organisation/ group.		

HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN – FEEDBACK ON POTENTIAL DEVELOPMENT SITES

PLEASE TICK THE RELEVANT BOXES

Site Name	Environmental consideration	Physical consideration	Accessibility consideration	Landscape and Visual consideration	Heritage consideration	Planning policy consideration	Prefer not to comment
Site 2 Chilfern Centre, Greys Road	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site 5 Land west of Fairmile <i>Allocated for 60 dwellings, pending planning decision for 72 dwellings</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	

Site Name	Environmental consideration	Physical consideration	Accessibility consideration	Landscape and Visual consideration	Heritage consideration	Planning policy consideration	Prefer not to comment
Site 8 Land at Reading Road, Harpsden Meadows	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site 13 Thames Poultry Farmhouse, Bolney Lane <i>Planning application for 2 dwellings refused by SODC in 2020 (P19/S1858/0).</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site 14 The Bungalow, Green Acres, Harpsden Woods	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	

Site Name	Environmental consideration	Physical consideration	Accessibility consideration	Landscape and Visual consideration	Heritage consideration	Planning policy consideration	Prefer not to comment
Site 853a Land at Highlands Farm (mixed housing and employment)	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site 878 Thames Farm (NE corner)	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site 903 Chilterns End, Chilterns End Close <i>Allocated for 27 dwellings - now being considered for C2 use (Care Home)</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	

Site Name	Environmental consideration	Physical consideration	Accessibility consideration	Landscape and Visual consideration	Heritage consideration	Planning policy consideration	Prefer not to comment
Site 1117 Land east of A4155, Wyewale <i>Planning application for 40 dwellings and employment floorspace approved by ADPC in 2019 (P18/50951/01) - now being considered for 80 dwellings.</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site 1158 Swiss Farm International, Marlow Road	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site C Playing Fields at Gilberts School <i>Allocated for 50 dwellings - now being considered for 80 dwellings</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	

Site Name	Environmental consideration	Physical consideration	Accessibility consideration	Landscape and Visual consideration	Heritage consideration	Planning policy consideration	Prefer not to comment
Site J 857 Reading Road <i>Allocated for 30 dwellings - one being considered for 30 dwellings</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
Site K Former Youth Centre, Deansfield Avenue <i>Allocated for 23 dwellings - being considered for £2 use (Care Home). Planning app. for care home refused in 2017 and app. for care home/affordable apartment block refused in 2020 (N19/S2486/PLU)</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	
NEW1 Land North of Crossways, Shiplake <i>Planning application for 20 dwellings refused in 2021 (N20/S2103/PLU)</i>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	

Site Name	Environmental consideration	Physical consideration	Accessibility consideration	Landscape and Visual consideration	Heritage consideration	Planning policy consideration	Prefer not to comment
NEW2 Hollowed House, Bulney Lane	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>	<input type="checkbox"/>
	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	2 <input type="checkbox"/>	
	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	3 <input type="checkbox"/>	

PLEASE TURN OVER

Do you have any comments regarding the suitability of any site listed above to potentially be allocated in the Henley and Harpsden Neighbourhood Plan?

SITE NUMBER	COMMENTS

Do you have any comments regarding the suitability of any site listed above to potentially be allocated for Community-led Housing in the Henley and Harpsden Neighbourhood Plan?

Community-led Housing is often delivered by a Community Land Trust (CLT). A CLT is set up and run by ordinary people to develop and manage homes as well as other assets. CLTs act as long-term stewards of housing, ensuring that it remains genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier.

SITE NUMBER	COMMENTS

Henley and Harpsden Neighbourhood Plan – TRANSPORT SURVEY

YOUR COMMUNITY, YOUR VOICE

Henley Town Council and Harpsden Parish Council are updating the 2016 Neighbourhood Plan. This presents a powerful opportunity for local people to shape the future of our communities.

The Plan will set out the challenges we face regarding major issues such as housing and development, climate change and the environment, community facilities and services, and roads and transport. It will offer a vision, objectives, and policies for dealing with these. The Plan is the most useful tool that we have in the box if we want to have a strong say over the big issues facing us.

The Plan will be based on consultation and discussion and subject to a local referendum.

WHY A TRANSPORT SURVEY?

To support the formation of policies and to supplement the information gathered from a general survey targeted at residents earlier in 2021, the Neighbourhood Plan Committee wants to know more about the views of community groups, businesses, and landowners with regard to TRANSPORT ISSUES.

This will update the consultation carried out as part of the Transport Study undertaken for the Town Council in 2015 and enable the Committee to understand opinions on transport related matters in Henley and Harpsden when drafting policies for the revision of the Neighbourhood Plan.

HOW DOES IT WORK?

Please respond **ON BEHALF OF YOUR ENTIRE GROUP, ORGANISATION OR BUSINESS**. You are of course welcome to consult with others before completing the survey. The survey should take about 15 minutes to complete.

IS IT CONFIDENTIAL?

Yes – the survey is being undertaken on behalf of the Neighbourhood Plan Committee [Community First Oxfordshire](#) (CFO), a community development charity.

Your data will be processed by CFO in accordance with the General Data Protection Regulation (2018). You can read CFO's Privacy Policy [here](#). Your data will not be shared with

any organisation, including the Neighbourhood Plan Committee. However, the survey does invite you to leave your contact details in relation to two specific subjects. CFO will provide a summary report on survey findings for the Committee.

THE DEADLINE FOR COMPLETION OF THE SURVEY IS 18 JUNE.

MANY THANKS FOR YOUR TIME - HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN COMMITTEE

- 1) What is the name of your organisation, group or business?**
If you wish to remain anonymous, please tell us what type of organisation you are.
- 2) Where is your organisation located?**
Please give a street location if possible or applicable
- 3) What form of transport do you think is most regularly used by your organisation? Car/ bus/ train/ cycle/ walk/ car club – choose one option only**
- 4) Does your organisation have a travel plan?**
- 5) If your organisation does have a travel plan, is it up to date or used? Yes/ No**

CAR TRAVEL

- 6) On a scale of 1-5, tell us about your experiences of CAR TRAVEL around Henley and Harpsden in general: 1 = very poor, 5= very good.**
- 7) What proportion of your members use their car to access your organisation and its services: 25%/ 50%/ 75%/ ALL/ NOT APPLICABLE**
- 8) Do you think car travel should be reduced in Henley and Harpsden? Yes/ No/ Maybe**
- 9) If you think car travel should be reduced, please tell us how: more extensive public transport network/ car share schemes/ car-free zones and times/ other – let us know below.**

COMMENT BOX

- 10) On a scale of 1-5, tell us what you think about the EFFECTS OF THE 20MPH SPEED LIMIT on VEHICLE JOURNEYS: 1 = very poor, 5= very good.**

PLEASE GIVE MORE INFORMATION BELOW – COMMENT BOX

11) On a scale of 1-5, what do you think about the current provision of Electric Vehicle Charging points? 1= not adequate at all, 5= completely adequate.

12) On a scale of 1-5, tell us what you think about TRAFFIC AND CONGESTION in Henley and Harpsden in general. 1= levels of traffic are very unreasonable/ unmanageable, 5= levels or traffic are very reasonable/ manageable

13) If you think traffic and congestion is a particular issue in certain places/ times, please tell us where.

COMMENT BOX

14) If you think improvements are needed regarding CAR TRAVEL, please tell us what: improved road quality/ surfaces/ more use of car clubs/ extension of 20mph zone/ restrict traffic in Henley centre at certain times/ other – tell us below.

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

PUBLIC TRANSPORT

15) On a scale of 1-5, tell us about your experiences of using PUBLIC TRANSPORT in general around Henley and Harpsden: 1 = very poor, 5= very good.

16) On a scale of 1-5, tell us about what you think about BUS TIMETABLES in Henley and Harpsden: 1 = very unsuitable, 5 = very suitable.

17) On a scale of 1-5, tell us what you think about BUSES in terms of providing access to businesses, shops, leisure pursuits, etc.: 1 = very poor, 5= very good.

18) If you think improvements are needed regarding BUSES, please tell us what: more frequent services/ better or more routes/ cheaper fares/ better located stops/ other – tell us below.

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

CYCLING

19) On a scale of 1-5, tell us about your experiences of CYCLING in general around Henley and Harpsden: 1 = very poor, 5= very good.

20) On a scale of 1-5, tell us what you think about CYCLING in terms of providing access to businesses, shops, leisure pursuits, etc.: 1 = very poor, 5 = very good.

21) On a scale of 1-5, tell us what you think about the EFFECTS OF THE 20MPH SPEED LIMIT on CYCLE JOURNEYS: 1 = very poor, 5= very good.

PLEASE GIVE MORE INFORMATION BELOW – COMMENT BOX

- 22) If you think improvements are needed regarding CYCLING, please tell us what:** *more or extended cycle lanes/ better quality road surfaces and cycle lanes/ better lit roads and cycle lanes/ more cycle parking/ other – tell us below.*

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

WALKING

- 23) On a scale of 1-5, tell us about your experiences of GETTING AROUND Henley and Harpsden as a PEDESTRIAN:** *1 = very poor, 5= very good.*
- 24) On a scale of 1-5, tell us what you think about PEDESTRIAN ACCESS to businesses, shops, leisure pursuits, etc.:** *1 = very poor, 5= very good.*
- 25) On a scale of 1-5, tell us what you think about the EFFECTS OF THE 20MPH SPEED LIMIT on PEDESTRIAN JOURNEYS:** *1 = very poor, 5= very good.*

PLEASE GIVE MORE INFORMATION BELOW – COMMENT BOX

- 26) If you think improvements are needed regarding BEING A PEDESTRIAN, please tell us what:** *improved signage/ better quality pavements/ wider pavements/ more pedestrianised areas/ other – tell us below.*

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

PARKING

- 27) On a scale of 1-5, tell us what you think about the AVAILABILITY OF PARKING in general Henley and Harpsden:** *1 = very bad, much more needed, 5= very good, no more needed.*
- 28) If you think improvements are needed regarding PARKING, please tell us what:** *more parking needed/ less parking needed/ improve resident parking system/ other – tell us below.*

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

HEAVY GOOD TRAFFIC

- 29) On a scale of 1-5, tell us what you think about the AMOUNT OF HGV TRAFFIC in Henley and Harpsden:** *1 = the amounts are very problematic, 5= the amounts are not problematic at all.*
- 30) If you think improvements are needed regarding HGV TRAFFIC, please tell us what:** *restrict HGV traffic in Henley centre/ ban HGV traffic from Henley centre/ other – tell us below.*

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

AIR QUALITY

31) On a scale of 1-5, tell us what you think about AIR QUALITY in Henley and Harpsden: 1 = quality is generally very bad, 5= quality is generally very good.

32) If you think improvements are needed regarding AIR QUALITY, please tell us what: ban or restrict HGV traffic/ restrict all traffic at certain times/ other – tell us below.

Please use the space below to offer more information/ detail if you wish – COMMENT BOX

THE SOUTH OXFORDSHIRE LOCAL PLAN

The current requirement from the South Oxfordshire Local Plan is that around a further 200 houses are planned for development in Henley. Tell us what you think the impacts might be IN GENERAL in relation to the following:

33) What impact do you think this will have in relation to TRAVELLING BY CAR around Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.

34) What impact do you think this will have in relation TO PUBLIC TRANSPORT around Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.

35) What impact do you think this will have in relation to BEING A PEDESTRIAN around Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.

36) What impact do you think this will have in relation to PARKING in Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.

37) What impact do you think this will have in relation to HGV TRAFFIC IN Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.

38) What impact do you think this will have in relation to AIR QUALITY IN Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.

39) What impact do you think this will have in relation to TRAFFIC AND CONGESTION in Henley and Harpsden? 1 = mainly very negative impacts, 5 = mainly very positive impacts.



PRESS RELEASE: FOR IMMEDIATE RELEASE

REVIEW OF NEIGHBOURHOOD PLAN - PRESENTATIONS ON POTENTIAL DEVELOPMENT SITES

September 2020

Henley Town Council and Harpsden Parish Council are reviewing the Joint Henley and Harpsden Neighbourhood Plan. The emerging South Oxfordshire District Council Local Plan suggests that more houses will be required in Henley over the next 15 years.

Landowners and developers were invited to submit sites for consideration in 2019 and submissions have since been assessed by AECOM, an external consultancy, for their suitability. The report on this can be seen on the agenda for the Neighbourhood Plan Committee meeting on 22 June 2020 - <https://www.henleytowncouncil.gov.uk/Committee-meetings-agendas-minutes-etc.aspx>

To continue the process of selecting possible sites for development, site promoters are presenting their sites to the public and the Neighbourhood Plan Committee virtually on Zoom in a series of online sessions. The presentations will also be streamed live on YouTube.

These will be running on **Monday 28th September, Wednesday 30th September and Thursday 1st October between 6:30pm – 9:30pm.**

Residents will be given the opportunity to put questions to site developers and this will help to determine a list of potentially suitable sites for development in Henley and Harpsden.

The presentation timetable is currently:

Monday 28th September

- 853 and 853a Land at Highlands Farm – 6:30pm
- Site 991 Chilterns End – 7: 30pm
- Site C Playing Fields at Gillotts School- 8:30pm

Wednesday 30th September

- Site 1158 Swiss Farm International, Marlow Road – 6:30pm
- Site 13 Thames Poultry Farmhouse - 7:30pm
- Site 5 Land west of Fairmile - 8:30pm



Thursday 1st October

- Site 6 Land at Reading Road, Harpsden Meadows – 6:30pm
- Site 2 Chiltern Centre - 7:30pm
- Site 1117 Land east of A4155, Wyevale - 8:30pm
- Site 878 Thames Farm (NE corner) – 9:15pm

To register to attend and speak at the sessions, please contact the Planning Officer, Jodie Rhymes, at j.rhymes@henleytowncouncil.gov.uk. To watch the sessions online, see the Henley Town Council YouTube channel https://www.youtube.com/channel/UCXGNEuRlaeVNTIijgjq5AZA?view_as=subscriber. The link for this is also on the Henley Town Council website – www.henleytowncouncil.gov.uk.

Ends

Notes to editors

For more information, contact the Planning Officer, Jodie Rhymes, at j.rhymes@henleytowncouncil.gov.uk / 07398 285131.

Press Advertisement for presentations on potential development sites (25.09.20)

OFFICIAL ANNOUNCEMENTS

Joint Henley and Harpsden Neighbourhood Plan Review

Presentations on Possible Development Sites

Henley Town Council and Harpsden Parish Council are reviewing the Joint Henley and Harpsden Neighbourhood Plan. As part of the review, we are presenting new sites for consideration and have invited local residents to present their views to the public. The presentations will take place on Wednesday 23rd September and Thursday 24th September between 6:30pm and 9:15pm.

Residents will be given the opportunity to put questions to the developers and the council to determine which potential development sites for Henley and Harpsden.

To see the presentation slides or to contact the Planning Officer, please visit the Henley Town Council website www.henleytowncouncil.gov.uk or call the Council on 07398 285131.



Henley Town Hall

Joint Henley and
Harpsden
Neighbourhood Plan

**Friday 2nd July &
Saturday 3rd July 2021**
10am-3pm

Exhibition of Proposed Development Sites

- Information on sites put forward for development
- Policies for the revised Neighbourhood Plan
- Information on a Community Land Trust for Henley
- Consultation on Public Toilets at Makins Recreation Ground



Press Advertisement for Exhibition of Proposed Sites (25.06.21)



 Joint Henley and Harpsden
 Neighbourhood Plan

Joint Henley and Harpsden Neighbourhood Plan Review

**You are invited to an Exhibition of Proposed Sites
at Henley Town Hall**

Friday 2 July and Saturday 3 July 10 a.m.—3 p.m.

Henley and Harpsden Parish Councils are reviewing the Joint Henley and Harpsden Neighbourhood Plan. As part of the review, potential new sites for development put forward by landowners and promoters are being displayed for comment by residents, businesses and other organisations based in Henley and Harpsden.

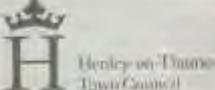
Information will also be available on the draft policies from the Neighbourhood Plan Committee and members of the committee will be available to answer your questions.

The proposed Henley Community Land Trust will have a stand and is keen to hear from residents or employees who would be interested in affordable housing.

There is also a consultation on installation of a public toilet at Makins Recreation Ground.

If you are unable to attend in person, information on proposed sites and the accompanying survey will be available online at <https://jhnp.org.uk/>. The survey will close on 12 July 2021.

Press Advertisement for Neighbourhood Plan and Housing Needs Survey (18.12.20)




Joint Henley and Harpsden Neighbourhood Plan Review

Neighbourhood Plan Survey – incorporating a Housing Needs Survey

Henley Town Council and Harpsden Parish Council are updating our local Neighbourhood Plan (the 'plan') and we need your input.

A Neighbourhood Plan is a written document that sets out how the area should be developed and what the community needs.

To be effective, a plan must focus on what local people think and feel.

Please help shape your Neighbourhood Plan by completing the survey. It is an easy and quick way to give your views. The survey includes questions to help guide the Neighbourhood Plan Committee on housing needs in Henley and Harpsden.

Those with suggestions or interests in the area should also complete the survey by completing the Neighbourhood Plan survey at <https://www.surveymonkey.co.uk/r/77VDS>.

Survey will close on Monday 11th July 2021

Leaflet to advertise the Regulation 14 Consultation



The Joint Henley and Harpsden Neighbourhood Plan- Public Consultation Survey



Henley Town Council and Harpsden Parish Council invites comments on its Draft Neighbourhood Development Plan (known as the 'Henley and Harpsden Neighbourhood Plan' (HHNP)). This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

The consultation period runs from 20 September until 1 November

What is this consultation about?

During this consultation we are consulting on the draft plan and associated evidence. The Neighbourhood Plan Committee wants to gather the views of all stakeholders, particularly those who live, work, or do business in Henley and Harpsden.

These views may relate to the proposed policies, the content and wording of the Plan, whether the evidence base is appropriate/ correct, whether the Plan is missing anything, or anything else you would like to bring to our attention. If you have any views on the documents, we want to hear them so that we can take them into account moving forward.

Once these views have been gathered the Plan and its associated documents will be amended as necessary before being submitted to South Oxfordshire District Council for examination.

How can you view the draft Neighbourhood Plan and Consultation Documents?

- The Neighbourhood Plan, its associated documents, and a link to an online consultation survey are available at: <https://jhhnp.org.uk/consultation/>

- Copies of The Neighbourhood Plan and its associated documents are available to consult at **Henley Town Hall and Henley Library from 20 September until 1 November.**

How can you respond to this consultation?

Responses to this consultation must be received prior to the end of the consultation period, which is midnight on 1 November. Responses must include a name, address and (if relevant) the organisation you are representing.

We would prefer if at all possible that comments are made via an online consultation survey.

Please go to:

<https://www.surveymonkey.co.uk/r/VRVRMLK>

However, you can also collect a hard copy of the consultation survey from Henley Town Hall. Please return your completed feedback form to the Town Hall.

How we will process your comments

The collation of your feedback will be undertaken on behalf of the Neighbourhood Plan Committee by Community First Oxfordshire (CFO), a community development charity. By responding to the consultation survey you are consenting for your response data to be shared by Community First Oxfordshire and Henley Town Council.

Your data will be processed by CFO and Henley Town Council in accordance with the General Data Protection Regulation (2018). You can read CFO's Privacy Policy at <https://www.communityfirstoxon.org/privacy-policy/>. You can read Henley Town Council's Privacy Policy at <https://www.henleytowncouncil.gov.uk/compliance/privacy>.

CFO will provide a summary report on comments received for the NP Committee. Comments received by individuals will be published in a consultation report, alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details.

Many thanks for your time,

**The Joint Henley and Harpsden
Neighbourhood Plan Committee**



Henley Town Hall

Joint Henley and
Harpsden
Neighbourhood Plan

Friday 15th October 2021

3pm-7pm

Saturday 16th October 2021

10am-3pm

Drop In Session for Neighbourhood Plan Consultation (Regulation 14)

- Information on sites put forward for development
- Policies for the revised Neighbourhood Plan





Joint Henley and
Harpsden
Neighbourhood Plan

The draft Joint Henley and Harpsden
Neighbourhood Plan is now open for
public consultation from
20 September to 1 November

Visit www.jhhnp.org.uk/consultation to read the
policies, proposed sites for development, view
supporting evidence and complete the survey.
You can also access this information by using
your camera phone to scan the QR code above.

Come to our drop in sessions at the
Town Hall
Friday 15 October 3-7pm
Saturday 16 October 10am- 3pm

This is the required Regulation 14 consultation before the Plan is
submitted to South Oxfordshire District Council for consideration

Appendix 4 – List of pre-submission (Regulation 14) consultees

List of statutory organisations consulted

Respondent	Response Received?
Oxfordshire County Council	Yes
South Oxfordshire District Council and Vale	Yes
Vale of White Horse District Council	
The Coal Authority	Yes
Homes England	
Natural England	Yes
Environment Agency	Yes
Historic England	
Network Rail	Yes
Highways England	
Marine Management Organisation	
BT	
EE	
Three	
EMF Enquiries - Vodaphone & O2	
Oxfordshire Clinical Commissioning Group	Yes
NHS England	
Avison Young (on behalf of National Grid)	
National Grid	Yes
Cadent	
Scottish and Southern Energy Power	Yes
UK Power Networks	
Thames Water - Developer Services	
Rotherfield Greys Parish	
Binfield Heath Parish	
Shiplake Parish	
Sonning Common Parish	
Bix and Assendon Parish	
Remenham Parish Parish	
Fawley Parish	

List of community organisations consulted

Henley Covid 19 mutual aid group
Henley in Transition inc Henley Wildlife
Henley Park Run
Thames Traditional Boat Festival
Henley Hockey Club
Spring box Gymnastics club
Henley Rowing club
Henley sailing club
Henleyskatepark
Henley synchronised swimmers
Henley tennis club
Green shoots -ways and means
Henley operatic society
Henley Falaise Twinnig Association
Henley Agricultural Association
Henley Archaeological and historical society
Henley chess club
Henley Educational Trust
Henley festival
Henley Literary festival
Henley Society
Henley Talking newspaper
Henley youthful orchestra
Rotary Club of Henley Bridge
Air Cadets
Army Cadets
Camp Mohawk
Children centre for disabled children
Henley music school
Henley Youth choir
Henley Youth festival
Nomad
Riverside Counselling
Scouting
Sea Cadets
YMCA
Parent and toddler
Christ Church Centre
Citizens Advice
Baptist church
The Eyot Centre
Gainsborough Residents Association
Highlands Park Community Centre
Lions
Sacred Heart Catholic Church
St. Mary's Church
Gillots School
Badgemore Primary School
Trinity CE Primary School
Valley Road Primary School
Sacred Heart Primary
Rupert House independent school
St Marys nursery and prep school
Harlesden preschool
Maiden Erlegh Chiltern Edge
The Henley College
Henley Rethink group
Royal British Legion
Henleyhandybus
Henley and district housing trust
Henley good neighbours
Henley municipal charities

Appendix 5 – Letter to pre-submission (Regulation 14) Consultees

Dear Consultee,

Consultation on Draft Joint Henley and Harpsden Neighbourhood Plan (Regulation 14)

We are writing to you as you represent a specific consultee body, as described in the Neighbourhood Planning (General) Regulations 2012 as amended (Schedule 1). The regulations require the qualifying body to notify you as part of the Regulation 14 Pre- Submission stage of the Neighbourhood Plan. Notice is hereby given that a public consultation on the Pre-Submission Neighbourhood Plan (Regulation 14) shall commence for a six week period from **Monday 20 September to Monday 1 November 2021**.

Subject Matter: The draft Joint Henley and Harpsden Neighbourhood Plan provides details on the proposed development sites and detailed planning policies to help deliver requirements set out in the South Oxfordshire District Council Local Plan and to take account of the Councils' declaration of a Climate Emergency. This consultation seeks feedback on the Plan and supporting evidence found in the Baseline Report.

Availability of Documents: The Consultation Documents, along with the Baseline Report, is available at <https://jhhnp.org.uk/consultation/>.

How to make representations: Please send your comments directly to:
J.Rhymes@henleytowncouncil.gov.uk

We are under a very tight deadline to submit our Plan to SODC by 10 December 2021 and would therefore appreciate your comments as soon as possible.

Please note that comments made outside of the advertised consultation period will not be accepted.

The Neighbourhood Plan Committee (NPC) are holding two consultation 'drop-in' events at Henley Town Hall where members of the public can find out more about the proposals.

The events will be open between 15:00 to 19:00hrs on Friday 15 October 2021 and 10:00 to 15:00hrs Saturday 16 October 2021.

We look forward to receiving your feedback.

Kind regards,

Jodie Rhymes
Planning Officer

Planning services

**HEAD OF SERVICE: HARRY
BARRINGTON-MOUNTFORD**



Listening Learning Leading

Contact officer: Ben Duffy

ben.duffy@southandvale.gov.uk

Tel: 01235 422600

05 November 2021

Henley and Harpden Neighbourhood Development Plan – Comments under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

Thank you for giving the Council the opportunity to offer formal comments on your draft neighbourhood plan review. We would like to take this opportunity to complement you on the preparation of a very thoughtful and well produced plan.

Having seen a complete draft, along with the Baseline Report, Environmental Report and Statement of Proposed Modifications, we are able to offer further advice under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

We are committed to helping this plan review succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

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

Yours sincerely

Ben Duffy
Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1	Paragraph 1.7	<p>It is not the Local Plan that does not allow for the Neighbourhood Plan to provide less but rather national policy.</p> <p>Paragraph 29 of the NPPF sets out that Neighbourhood Plans “should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”. If the Neighbourhood Plan was to set out less growth than that required by policy H3 of the Local Plan, this would undermine STRAT2: Housing and Employment Requirements which sets out the housing requirement for the district.</p> <p>This paragraph requires amending to reflect that it is national policy that states the Neighbourhood Plan should not promote less development or undermine that which is set out in strategic policies. We have proposed wording below.</p> <p>“Any Neighbourhood Plan has the opportunity to provide more than the proposed number of houses and amount of retail and leisure floorspace set out in the Development Plan, but National Policy states that the Neighbourhood Plan should not promote less growth than that required by strategic policies for the area, or undermine those policies”.</p>
2	Paragraph 2.11	<p>As illustrated in the Planning Practice Guidance¹ the Examiner’s role is to test whether the Neighbourhood Plan meets the basic conditions.</p> <p>When the Examiner considers a proposal for the review of a Neighbourhood Plan, the Examiner must first decide whether the proposed modifications are so significant or substantial as to change the nature of the plan.</p> <p>Where material modifications do not change the nature of the plan (and the examiner finds that the proposal meets the basic conditions, or would with further modifications) a referendum is not required. The district council will be</p>

¹ Para 055, Neighbourhood Planning, Planning Practice Guidance, available from <https://www.gov.uk/guidance/neighbourhood-planning--2>

Ref.	Section/Policy	Comment/Recommendation								
		<p>required to decide if the modified plan should be 'made' within 5 weeks following receipt of the examiner's report, or such later date as agreed in writing between the district and the town council.</p> <p>Where material modifications do change the nature of the plan, the district council would publicise and consider the examiner's report in line with the procedure for making a new neighbourhood plan. The district council would then be required to decide whether to proceed to referendum so that, if the referendum is successful, the modified neighbourhood plan becomes part of the development plan.</p> <p>We recommend paragraph 2.11 is updated to reflect the process set out above.</p>								
3	Paragraph 2.12	<p>Planning decisions should be made in accordance with relevant policies in the development plan, which policies in a made NDP are part of, unless there are material considerations that indicate otherwise.</p> <p>We would recommend replacing 'form the basis of' with 'be used to make'</p>								
4	Paragraph 3.17	<p>Reference to the 'Strategic Housing Market Assessment' should be stated as 'Oxfordshire Strategic Housing Market 2014' for clarity in the document being referred to.</p>								
5	Paragraph 3.21	<p>As paragraph 3.21 contains a now superseded tenure mix we would recommend that the paragraph is deleted, with the table below being added after paragraph 3.23 with an explanation that this is the updated tenure mix in South Oxfordshire taking into account the changes introduced by First Homes.</p> <table border="1" data-bbox="699 1731 1385 1966"> <thead> <tr> <th data-bbox="699 1731 1038 1787">Tenure</th> <th data-bbox="1038 1731 1385 1787">South Oxfordshire</th> </tr> </thead> <tbody> <tr> <td data-bbox="699 1787 1038 1854">First Homes</td> <td data-bbox="1038 1787 1385 1854">25%</td> </tr> <tr> <td data-bbox="699 1854 1038 1910">Social Rent</td> <td data-bbox="1038 1854 1385 1910">35%</td> </tr> <tr> <td data-bbox="699 1910 1038 1966">Affordable Rent</td> <td data-bbox="1038 1910 1385 1966">25%</td> </tr> </tbody> </table>	Tenure	South Oxfordshire	First Homes	25%	Social Rent	35%	Affordable Rent	25%
Tenure	South Oxfordshire									
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Ref.	Section/Policy	Comment/Recommendation	
		Other routes to affordable home ownership	15%
6	Paragraph 3.22	Typo – replace ‘realised’ with ‘released’	
7	Policy ENV1: Air Quality	<p>The second sentence in the the first paragraph is supporting text rather than policy wording. It provides a non-exhaustive list of examples of harmful pollutants. It is also important to provide references to the WHO and UN information referred to ensure sufficient clarity on the application of the policy. Therefore, we recommend the first paragraph should be relocated into supporting text.</p> <p>To help the policy work more effectively with Policy EP1 of the South Oxfordshire Local Plan 2035 and to improve clarity, we recommend that the second paragraph is amended as follows</p> <p>“All development proposals should include measures to minimise air pollution at the design stage and incorporate best practice in the design, construction and operation of the development. In particular;”</p> <p>Point a) appears to contain a small contradiction. It describes ‘neutral’ as ‘better than’ as opposed to ‘no worse’.</p> <p>Point c) is currently a statement. As point a) effectively covers the aim of point c) this can be removed without affecting the policy.</p>	
8	Policy ENV2: Biodiversity	<p>In order to ensure that the development does not place over onerous burdens on applicants, we recommend that the wording in part A is amended from</p> <p>“Development should maintain and enhance the natural environment and its intrinsic ecological value. In particular, development is encouraged where it”</p> <p>To</p>	

Ref.	Section/Policy	Comment/Recommendation
		<p>“Development should maintain and enhance the natural environment and its intrinsic ecological value. As appropriate to their nature and scale, development proposals should:”</p> <p>For the same reason we propose that part B is amended from “In order to enhance the environment and biodiversity, proposals for new development or the replacement of existing development are encouraged to include tree and shrub planting, that:”</p> <p>to</p> <p>“Development should enhance the environment and biodiversity. As appropriate to their nature and scale, development proposals are encouraged to include tree and shrub planting, that:”</p>
9	Policy ENV3: Trees	The term any proposal at the beginning of part A of the policy should be more precise. We recommend it is amended to “Proposals that affect existing trees should contain plans for their protection...”
10	Paragraph 5.27	<p>We recommend you add the following considerations to paragraph 5.27.</p> <p>When designating land as Local Green Space it should also be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p> <p>Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</p>
11	Paragraph 5.29	<p>For clarity, it would be helpful to reference the Baseline Report as the document that contains the Topic Papers.</p> <p>It would also be helpful to show maps of each individual Local Green Space allocation as an appendix to the Plan or as part of the Topic Paper.</p>
12	Policy SD1a: Fabric First Approach	The first sentence of the Policy states “Fabric First required for any development that requires

Ref.	Section/Policy	Comment/Recommendation
		<p>planning permission.” Currently this sentence lacks clarity and is unduly onerous.</p> <p>We would propose this sentence is clarified, and detail added, to state “Commensurate to their size and scale, development proposals should consider a Fabric First approach to its design to minimise its carbon emissions and as a minimum meet the energy efficiency requirements set out in the Development Plan.”</p>
13	Policy SD1b: Other Methods	<p>The policy states that “If electrical and mechanical means of meeting or exceeding the goal of carbon neutrality are required, then...”</p> <p>Whilst we support the objective of promoting zero carbon through your neighbourhood plan, as currently worded this policy does not have regard to national planning policy and guidance.</p> <p>The Planning and Energy Act 2008 only allows the district council to include policies requiring development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations within development plan documents. Neighbourhood Plans are not development plan documents but form part of the district’s development plan. This is consistent with guidance issued by the Secretary of State which states that “qualifying bodies preparing neighbourhood plans should not set in their emerging neighbourhood plans, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”</p> <p>“...For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans ...”</p> <p>Policy DES10: Carbon Reduction of the South Oxfordshire Local Plan provides the relevant standards. We have also produced a guidance note on the implementation of Policy DES10 to ensure it is clear what is expected from development proposals.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>We recommend that the wording of the policy is amended as proposed below, to ensure that it has regard to national policy and guidance</p> <p>“Where electrical and mechanical means are required to meet energy efficiency targets set out in the Development Plan, or any higher standards introduced by National Policy, development proposals are encouraged...”</p> <p>Overall, we believe there is an opportunity for a clearer connection to be made between Policies SD1a and b of the neighbourhood plan and Local Plan Policy DES10.</p> <p>In delivering the standards set out in Policy DES10, Policy SD1a encourages a fabric first approach and where this is not possible, Policy SD1b encourages the incorporation of A to F. This approach is in line with DES10 as set out in paragraph 8.37 of the Local Plan</p> <p><i>“The Council encourages developers to take account of the energy hierarchy when identifying the measures taken to reduce carbon emissions and to adopt a fabric first approach by maximising the performance of the components and materials that make up the building fabric before considering the use of mechanical or electrical building services systems. Consideration should also be given to modern methods of construction.”</i></p>
14	Policy SD3: Local Character	<p>Point a is currently a statement rather than policy wording. We recommend the sentence is amended to state “Development should have regard to the importance of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing.”</p>
15	Policy H1: Design Brief	<p>The first sentences of the Policy state “For all of the allocated sites listed within Policy H1, a Design Brief must be produced for the whole site, setting out the principles for development prior to the submission of a planning application. Development must be implemented</p>

Ref.	Section/Policy	Comment/Recommendation										
		<p>in accordance with the principles set out in the Design Brief.”</p> <p>This should be amended to state ““For all of the allocated sites listed within Policy H1, a Design Brief must be produced for the whole site, setting out the principles for development on the submission of a planning application.”</p> <p>The amendment to the first sentence to state a design brief should be submitted on submission of a planning application is because there is not sufficient clarity on how a design brief should be submitted prior to a planning application, and how this would be considered.</p> <p>The second sentence has been removed as the development must be implemented in accordance with the approved planning permissions and associated conditions, not a design brief.</p>										
16	Policy H2: Affordable Housing	<p>This policy should set out the expected tenure mix for affordable housing that will be sought on major developments.</p> <p>The first sentence should be amended to state “Taking into account the requirements for affordable housing set out in the Local Plan Policy H9, as well as the requirement that at least 25% of all affordable housing units delivered should be First Homes, the affordable housing tenure sought should be in accordance with the table below:</p> <table border="1" data-bbox="699 1473 1385 1861"> <thead> <tr> <th data-bbox="699 1473 1038 1541">Tenure</th> <th data-bbox="1038 1473 1385 1541">South Oxfordshire</th> </tr> </thead> <tbody> <tr> <td data-bbox="699 1541 1038 1599">First Homes</td> <td data-bbox="1038 1541 1385 1599">25%</td> </tr> <tr> <td data-bbox="699 1599 1038 1659">Social Rent</td> <td data-bbox="1038 1599 1385 1659">35%</td> </tr> <tr> <td data-bbox="699 1659 1038 1720">Affordable Rent</td> <td data-bbox="1038 1659 1385 1720">25%</td> </tr> <tr> <td data-bbox="699 1720 1038 1861">Other routes to affordable home ownership</td> <td data-bbox="1038 1720 1385 1861">15%</td> </tr> </tbody> </table> <p>”</p> <p>As the supporting text contains the information on what a First Home is there is no need to contain this in the policy as well.</p>	Tenure	South Oxfordshire	First Homes	25%	Social Rent	35%	Affordable Rent	25%	Other routes to affordable home ownership	15%
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Ref.	Section/Policy	Comment/Recommendation
17	Paragraph 7.7	<p>This paragraph should be updated to recognise the introduction of First Homes and the impact it has had on the tenure split that will be sought for affordable housing in the district.</p> <p>A sentence should be added to the end of the paragraph that states “However, due to changes resulting from the introduction of First Homes the district policy has effectively been amended, and a tenure split of 25% First Homes, 35% Social Rent, 25% Affordable Rent and 15% other routes to affordable home ownership will now be sought in the district.”</p>
18	Policy H3: Housing Type and Mix	<p>We recommend that the policy wording is amended as proposed below to ensure clarity</p> <p>“Proposals for residential development should deliver a mix of dwelling types and sizes to meet the needs of current and future households. Proposals should have regard to local housing need, as evidenced by the Henley and Harpsden Housing Needs Assessment and any future updates.”</p>
19	Paragraph H4: Infill and Self Build Dwellings	<p>The policy wording should be amended to “Infill housing developments and proposals for the construction of self-build dwellings within the built-up areas of Henley and Harpsden will be supported where it is demonstrated that the proposed development is in accordance other relevant policies of the development plan.”</p> <p>This is because as currently worded the policy lacks clarity.</p>
20	Policy E1: Supporting Henley’s Economy	<p>The second sentence of the policy is overly restrictive and should be deleted.</p> <p>Policy EMP3 of the Local Plan, Retention of Employment Land, sets out a detailed approach to how employment land will be retained in the district and when it may be appropriate for non-employment uses to be permitted on employment land This sentence should be deleted.</p>
21	Policy E2: Henley Town Centre	<p>In order to ensure clarity we have proposed amended wording to the policy below. This is to ensure that only appropriate uses are identified by the policy.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>“Proposals for new retail, leisure, hotel and office development should be located within the defined town centre boundary. Development proposals for retail, leisure and office uses on unallocated sites outside the defined town centre must be in accessible locations...”</p>
22	Paragraph 9.12	<p>This paragraph should be amended to state that “The South Oxfordshire Infrastructure Funding Statement sets out how funding received from the Community Infrastructure Levy (CIL) will be allocated. In accordance with this CIL funds may be allocated to transport infrastructure, including strategic highways or transport infrastructure projects (including public rights of way). This includes infrastructure/measures to improve air quality and monitoring.”</p> <p>This is to ensure it accurately reflects the CIL Spending strategy, which can be accessed here.</p>
23	Policy T2: Active Travel	<p>Point B of the policy should be reworded to be positively prepared. We have proposed amended wording below.</p> <p>“B. Development proposals that lead to any of the following will not be supported:</p> <ul style="list-style-type: none"> a) A reduction in the capacity of existing active travel infrastructure; b) A reduction in the safety of active travel infrastructure; or c) A Reduction in the capacity, quality or accessibility of local facilities which support active travel
24	Policy T3: Easing Congestion	<p>To ensure the policy applies to appropriate development, the first sentence should be amended. We have proposed wording below.</p> <p>“Subject to compliance with other policies in the Neighbourhood Plan and elsewhere in the Development Plan, development proposals which have significant transport implications will be supported where it can be demonstrated that:”</p> <p>Point a of the policy should be amended to ensure it has regard to National Policy, specifically paragraph 111 of the NPPF. We have proposed amended text below</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>“they will not have an unacceptable impact on highway safety, or have severe residual cumulative impacts on the road network, in Henley Town Centre...”</p> <p>Point b of the policy states that “additional opportunities to alleviate traffic congestion on the highway network and through improvements to pedestrian and cycling routes and improvements to public transport have been identified, considered, assessed and will be implemented subject to viability testing in accordance with paragraph 57 of the Framework.”</p> <p>Paragraph 57 of the NPPF sets out the tests for when a planning obligation may be sought, and does not specifically relate to viability. As viability and the weight to be given to its consideration will be a matter for the decision maker viability does not specifically need to be referenced, and can be removed from the end of the sentence.</p>
25	Policy T4: EV Charging Points	<p>There is text in this policy that would be more suitable as supporting text to the Policy.</p> <p>The following part of Point A should be moved to supporting text “Electric vehicle parking spaces should be counted as part of the total parking provision and bays should be clearly marked. Charging points should also be included in parking spaces for the disabled and the provision of charging points cannot be used as a reason for why disabled parking spaces cannot be delivered”.</p> <p>Point F is a project rather than a planning policy, and should be moved outside of the policy box.</p>
26	Policy T5: Public Transport	<p>Point A of the policy should be amended to be positively prepared. We have proposed amended text below.</p> <p>“Proposals on the Henley Railway Station Site should seek to enhance the services, transport links and amenity provided.”</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Point B relates to bus services. Bus services are not a land use and therefore the policy needs to be amended to be effective. We have proposed wording below.</p> <p>“Development proposals are required to meet the infrastructure and service needs it creates. Where developments are likely to lead to an increased need for bus services, they should make contributions towards these.”</p> <p>C is not a land use policy and should be removed. It may be useful to have a section on projects in the Plan if looking to show these. An example of how this could be done is demonstrated in the Goring Neighbourhood Plan.</p> <p>Following on from our comments on Part C, Part D of the policy should be deleted.</p> <p>Policy TRANS5 of the Local Plan sets out an approach to access to public transport from developments. We would recommend the wording of point E is amended accordingly. We have proposed amended wording below.</p> <p>“Where appropriate, development proposals should be designed to facilitate access to high quality public transport routes, including safe walking routes to nearby bus stops or new bus stops”</p>
27	Policy T6: Parking and Standards	<p>Point D of the policy states that the loss of designated car parks as identified on the policies map will not be acceptable. However, there does not seem to be a designation for this on the policies map on page 23.</p> <p>In addition, having reviewed a similar policy in a Neighbourhood Plan that has passed examination we would recommend changes to the wording of point D, which we have set out below.</p> <p>“Any proposals to develop on existing public car parks within the Plan area will need to demonstrate that the overall number of car parking spaces available to the public and their</p>

Ref.	Section/Policy	Comment/Recommendation
		<p data-bbox="699 232 1350 300">ease of use is adequate to meet the needs of the town centre and railway station.”</p> <p data-bbox="699 344 1310 488">As currently worded Point D may be overly restrictive, and we consider the wording proposed above to address this whilst maintaining the aim of the policy.</p>
28	Site Allocations	<p data-bbox="699 562 1362 1144">In regard to the site allocations, we note that there are sites that do not accord with policy STRAT5: Residential Densities in the Local Plan. Point 3 of this policy states “Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density”.</p> <p data-bbox="699 1189 1382 1438">In particular sites A1, C and DS7 do not appear to have net densities that would accord with policy STRAT5. If there are planning reasons for why sites should have a lower density, these should be explained clearly, as it is important to make efficient use of land allocated for development.</p>

Approved by: _____ Cllr. Simpson _____

Date: __05/11/2021_____

OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: Strategic Planning

Officer's Name: Sarah Steere-Smith

Officer's Title: Planner

Date: 16th November 2021

Strategic Comments

The Joint Henley and Harpsden Neighbourhood Plan (JHHNP) was made (adopted) in 2016. In line with the adoption of the new South Oxfordshire Local Plan in 2020 the JHHNP is being reviewed and this is the first public consultation on the pre-submission version of the revised JHHNP.

The pre-submission JHHNP contains policies divided into the following sections:

- Environmental,
- Sustainable,
- Housing,
- Economy,
- Transport,
- Social Infrastructure, and
- Site Policies.

Site Allocations

Policy H3: *Housing in the Towns of Henley-on-Thames, Thame and Wallingford* allocates at least 1,285 new homes to Henley on Thames. However, Completions and Commitments as of 1st April 2020 mean the minimum outstanding for the Neighbourhood Plan is 115 new homes.

The pre-submission JHHNP allocates two new residential sites (M1: Northern Field at Highlands Farm and Site Y: Chilterns Centre) and six residential allocations carried over from the made (adopted) JHHNP 2012 - 27. These eight sites are as follows:

1. Site A1: Land West of Fair Mile. The pre-submission plan increases the dwellings allocated from 60 to 72. We note there is a planning application for 72 dwellings at this site under consideration at the moment by SODC (P19/S2350/FUL).
2. Site C Gillott's School Playing Field. This is allocated for 50 dwellings.

- This has been assessed by AECOM for 80 dwellings. Page 72 of the pre-submission neighbourhood plan includes 'Policy SCI1: Comprehensive Renewal of Gillotts School'.
- 3. Site E: Empstead Works/Stuart Turner. This is allocated for mixed use including 42 dwellings and at least 3,000sqm of town centre mixed use including employment & 1,500sqm for a single format Food Store.
- 4. Site F: Chiltern's End. This is allocated for 27 dwellings.
 - This has been assessed by AECOM as suitable for C2 use.
- 5. Site J: 357 Reading Road. The pre-submission plan has increased the dwelling numbers from 30 to 50 dwellings
 - This has been assessed by AECOM as suitable for 50 dwellings.
- 6. New Site M1 Northern Field at Highlands Farm. The pre-submission plan proposes to allocate this for 110 dwellings.
 - 1ha employment land, relocations of Chilterns Centre
 - Please see Estates comments.
- 7. Site X Henley Youth Club. This is allocated for 23 dwellings.
 - This has been assessed by AECOM for C2 use.
- 8. New Site Y: Chilterns Centre. The pre-submission plan proposes to allocate this for 3 dwellings.
 - Please see Estates comments.

There is also a site allocated for B1 business activities: Policy DS10: Land at Newtown Road (site AD).

These allocations add up to around 377 dwellings which is an additional 145 dwellings compared to the allocations in the existing JHHNP.

Environmental weight limit

The current wording regarding a possible environmental weight limit in Henley in the neighbourhood plan is **incorrect and requires re-writing**. An incorrect date is referred to and the wording describing what was agreed has attempted to paraphrase the Council motion resulting in a misrepresentation of what has been agreed. It is essential that the wording regarding the Council motion is correct and given that this text is in appendix to the Neighbourhood Plan it seems appropriate that the full text of the Council motion is included to avoid any confusion. The full text can be found in our Transport Strategy Comments later in this response.

The current incorrect wording in the pre-submission JHHNP in Appendix A and the Baseline Report is:

- Appendix A, point B on page 88 states a Priority Project in the JHHNP is : *'HGV environmental restriction – on 23 March OCC agreed in principle, subject to funding being found, and completion of the necessary studies, to an environmental weight restriction on HGVs travelling through Henley'*.
- The Baseline Report Topic Paper 1 states the same point slightly differently (page 15, paragraph 7.39) *'On 23 March OCC agreed in principle to an environmental weight restriction on HGVs travelling through Henley, subject to funding being found, and completion of the necessary studies.'*

The wording in the NP must be revised to accurately reflect that there was an OCC Cabinet motion approved on 7th April 2021 to undertake the necessary studies for an environmental weight restriction for Henley. This would include an assessment of the impact on other crossings of the Thames and of alternatives, and ultimately a recommendation on the feasibility and appropriateness of imposing an environmental weight restriction. It should be made clear that whilst OCC have agreed (subject to funding) to undertake the necessary studies, no commitment to implement an environmental weight limit has been made; such a decision would depend on the results of the studies and other considerations.

On 7th April 2021 OCC's Cabinet resolved to:

'The County Council will consider environmental weight restrictions across the County, particularly areas which are subject to significant levels of HGV traffic, prioritising the towns of Burford, Chipping Norton and Henley-on-Thames. However, the county council is very unlikely to have any funding available for this in the coming years so any schemes would need to be funded through development and/or by local communities, businesses and town/parish councils.'

This policy clearly states that Henley is subject to significantly high levels of HGV traffic. Henley is also an AQMA area which means we have significant pollution.

Council calls upon the Corporate Director for Environment and Place to complete the necessary studies for an environmental weight restriction for Henley, in the event that funding to cover the whole cost is secured through development and/or by local communities, businesses and town/parish councils and would not fall on the OCC.'

Local Green Spaces Designations

Policy ENV4: *Local Green Spaces* designates 16 Local Green Spaces. However, the plan of these shown in Figure 1 – Proposed Local Green Space Designations is not clear enough for our Estates or Highways team to ascertain if these Local Green Spaces designations are on County Council land. The Baseline Report does unfortunately not contain any individual plans of these sites either.

The County Council is the Highways Authority for Oxfordshire. Land which is part of the maintained highway is highway land, and this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highways status of land means the public have the right to pass and re-pass over it and public utilities has the right to site equipment on or within it. It is unclear how any green space status could affect this, or the ability to carry out any highways works or improvements in the future and we would not want the neighbourhood plan to be considered to fetter this ability in any way.

Information on highways land can be found directly on the mapping tool on this webpage: [Map of streets we maintain | Oxfordshire County Council](#).

If County Council land is included in any Local Green Space (LGS) designation we would have to object to the neighbourhood plan due to the reasons outlined above.

It is therefore recommended that individual plan of each of these designations is included in the next iteration of the Baseline Report produced to support the Submission JHHNP and any County Council land or land which is part of the maintained highway is excluded from any of these Local Green Spaces designations. Four designations in particular need reviewing:

- Sites 31 Millennium Woods and 19 Gillotts Wood – both potentially impinge on the OCC-owned bridleway running to the north of the proposed LGSs and therefore it would be sensible to ensure that the LGS designation excludes the bridleways which – using the methodology employed by the NP Steering Group – are already protected by the bridleway’s right of way status.
- Sites 21 Corner of Harpsden Road and Sheepphouse and 35 Harpsden Court– because of the poor quality of the LGS location plan and lack of individual plans for each proposed LGS site, it is not possible to determine whether these two adjoining sites include or exclude OCC-owned land within and adjacent to the public highway. As these small parcels of land are held for functional highway purposes it would be sensible to exclude them from the LGS designations in all cases, so that the LGS boundaries are drawn tightly around the wooded areas that they purport to protect.

Other points

- The JHHNP references S106 throughout and it should be considered if some of these references should refer to CIL contributions instead or in addition to S106 as appropriate.
- Paragraph 3.22 should read ‘*released*’ not ‘*realised*’.
- Policy H1: *Design Brief* text refers to all of the sites listed in the policy but then does not list any sites. Perhaps this should refer to policy DS1.
- Policy T3: *Easing Congestion* references ‘*paragraph 57 of the Framework*’ without further explanation as to which Framework is being referred to.
- Oxfordshire County Council teams previously commented informally on possible site allocations in August 2021.
- Comments from County Councillor Bartholomew on the pre-submission JHHNP are in Annex 1 of this response.

County Council officers have recommended a series of wording changes in the pre-submission Neighbourhood Plan:

- Appendix A, point B on page 88 of JHHNP – see our Transport Strategy comments attached.
- The Baseline Report Topic Paper 1 (page 15, paragraph 7.39) – see our Transport Strategy comments attached.
- Page 21 Primary objective TO2 – See our Public Transport comments attached.
- Policy SCI 1: Comprehensive Renewal of Gillotts School – See our Estates comments attached.
- Policy DS5 (formerly SP4): Chilterns End (Site F) – See our Estates comments attached.

- Individual plans for Local Green Space designations in the Baseline Report are also recommended, alongside excluding any OCC land from these designations.

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: Transport Development Control

Officer's Name: Judith Goodwin

Officer's Title: Senior Transport Planner

Date: 18th October 2021

Transport Development Control Comments

Site	Dwellings allocated in <u>adopted Joint Henley and Harpsden NP</u>	Dwellings allocated in this Pre-Submission Joint Henley and Harpsden NP	(Site Allocation details are on pages 74 – 87 of Pre-Submission JHHNP) Notes	TDC Comments
Site A1: Land West of Fair Mile	Around 60	72	Planning application P19/S2350/FUL for 72 dwellings under consideration by South Oxfordshire District Council.	This a 'live' planning application. As per previous comments.
Site C: Gillot's School Playing Field	Around 50	50	Assessed by AECOM for 80 dwellings. <i>See Policy SCI1: Comprehensive Renewal of Gillotts School page 72.</i>	As per previous comments.
Site E: Empstead Works/Stuart Turner	Mixed use including 42	Mixed use including 42	At least 3,000sqm of town centre mixed use including employment & 1,500sqm for	<ul style="list-style-type: none"> • 350m walk to town centre • Within 50m of a bus stop • Access to the site is from Stuart Road and Wilkins Court.

			a single format Food Store	<ul style="list-style-type: none"> • Stuart Road is a private road off Greys Road. Access is only wide enough for one vehicle. From the plan it appears Stuarts Road is within the red line boundary. • Wilkins Court can be accessed from both greys Road and Deanfield Avenue. From the plan it appears Wilkins Court is outside the red line boundary. • Applicant would need to demonstrate access is safe and suitable. • The applicant would need to be demonstrate the net change in traffic generation between the existing and proposed land use.
Site F: Chiltern's End	Around 27	27	Assessed by AECOM for C2 use (residential institution e.g. care home)	As per previous comments.
Site J: 357 Reading Road	Around 30	50	Assessed by AECOM for 50 dwellings	As per previous comments.
NEW Site M1: Northern Field at Highlands Farm	0	110	1ha employment land, relocation of Chilterns Centre	<ul style="list-style-type: none"> • 2.5km walk to town centre • Within 400m of a bus stop

Site X: Henley Youth Club	Around 23	23	Assessed by AECOM for C2 use (residential institution e.g. care home)	As per previous comments.
NEW Site Y: Chilterns Centre	0	3		<ul style="list-style-type: none"> • 1.5km walk to town centre • Within 400m of a bus stop • Existing access is via Chiltern End Close which is narrow. Applicant would need to demonstrate access is safe and suitable.
Total	232	377	145 additional dwellings proposed in JHHNPR	

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: South & Vale Infrastructure Locality Team

Officer's Name: Edward Masterson-Cox

Officer's Title: Transport Planner

Date: Wednesday 13th October 2021

Transport Strategy Comments

Henley-on-Thames environmental weight restriction proposal

The proposed draft joint Henley and Harpsden Neighbourhood Plan states:

Appendix A, point B on page 88 states a 'Priority Project' in the JHHNP is: *'HG V environmental restriction – on 23 March OCC agreed in principle, subject to funding being found, and completion of the necessary studies, to an environmental weight restriction on HG Vs travelling through Henley'*.

and

The Baseline Report Topic Paper 1 states the same point slightly differently (page 15, paragraph 7.39) *'On 23 March OCC agreed in principle to an environmental weight restriction on HG Vs travelling through Henley, subject to funding being found, and completion of the necessary studies.'*

The above statements from the proposed Neighbourhood Plan are incorrect and misleading; on 7th April 2021 OCC's Cabinet resolved to (emphasis added in bold):

'The County Council will consider environmental weight restrictions across the County, particularly areas which are subject to significant levels of HG V traffic, prioritising the towns of Burford, Chipping Norton and Henley-on-Thames. However, the county council is very unlikely to have any funding available for this in the coming years so any schemes would need to be funded through development and/or by local communities, businesses and town/parish councils.'

This policy clearly states that Henley is subject to significantly high levels of HG V traffic. Henley is also an AQMA area which means we have significant pollution.

*Council calls upon the Corporate Director for Environment and Place to **complete the necessary studies** for an environmental weight restriction for Henley, in the event that funding to cover the whole cost is secured through development and/or by local communities, businesses and town/parish councils and would not fall on the OCC.'*

The wording in the NP must be revised to accurately reflect that there was an OCC Cabinet motion approved to undertake the necessary studies for an environmental weight restriction for Henley. This would include an assessment of the impact on other crossings of the Thames and of alternatives, and ultimately a recommendation on the feasibility and appropriateness of imposing an environmental weight restriction. **The principle of an environmental weight restriction for Henley has not been agreed.**

Details of Member's decision

Details of the original proposal – County Council Member's meeting, Tuesday 23 March 2021 10:00am – can be found here:

<https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=116&MId=6488>
[accessed 12/10/2021].

The motion was amended and then carried with 40 votes for, 3 votes against and 15 abstentions at County Council Member's meeting, Wednesday 7 April 2021, 10:00am, details of which can be found here:

<https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=116&MID=6613>
[Accessed 12/10/2021].

Necessary studies to assess the feasibility and appropriateness of imposing an environmental weight restriction:

Representatives from OCC, including officers and Cllr Gawrysiak, and from Henley-on-Thames Town Council met on 16th August 2021 to discuss the issue further. A full summary of those discussions, as well as a detailed report produced by OCC officers was shared with the meeting's attendees on Wednesday 13th October 2021.

It stated the following, including but not limited to:

- Advice to Henley-on-Thames Town Council was given in the context of paragraph 18 of OCC's current Transport Plan as follows:

“Our policy on new environmental weight limits is that it would first be necessary to establish that a particular location has a problem in terms of environmental and economic impacts as reflected in congestion, air quality, road danger and public concern. It would then be necessary to identify the share of HGV traffic that does not constitute local access based on origin and destination surveys and other data, as well as analysis of alternative routes. Consideration of weight limits would also need to have reference to the road hierarchy set out earlier in this Local Transport Plan”.¹

¹ 'Oxfordshire Freight Strategy' (2015) Connecting Oxfordshire: Local Transport Plan 2015 – 2031. Accessible via: <https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/county-and-corridor-strategies>

- Establishing the geographical parameters of a scheme are a prerequisite to any other works.
- The extent to which Henley-on-Thames is used as a through-route needs to be fully understood and evidenced.
- Survey work needs to be funded by Henley-on-Thames Town Council (or third parties) as the scheme is beyond the budget of OCC.
- OCC has a responsibility to all highway users, therefore any limitation of particular vehicles/road users must be properly evidenced and deemed necessary.
- Mapping and modelling all alternative routes – including multiple drop-offs and end-to-end modelling – is required, particularly if a permit scheme was sought which incites significant cost and works.
- Officers recommend avoiding a 7.5t restriction:
 - OCC recommend considering an 18- rather than a 7.5-tonne restriction, because the former is simpler and more cost effective and will largely achieve the same outcomes.
 - Any vehicle weighing 18 tonnes or more has at least three axles, which is why classifying 18+ tonne vehicles is simpler and more cost effective.
- Officers recommend considering the implications of having a permit scheme, because in most weight restrictions they are not used. They can be difficult to define and costly to manage.
 - For reference, Burford and Suffolk are the only two places in the UK to have a permit scheme for a weight restriction, with Burford's being an active experiment rather than a permanent scheme.
- Relevant stakeholder engagement is necessary.
- Henley-on-Thames Town Council will have to seek delegated authority by OCC for enforcement.
- Henley-on-Thames Town Council will need to pay for all signage for an ETRO and in the future for a permanent scheme if introduced.
 - Any current signage that directs traffic to Henley-on-Thames would need new signage to incorporate the weight restriction, for example including on the A34 and Oxford ring road.
- If a vehicle weight restriction were to be progressed via an ETRO and then an TRO in Henley-on-Thames, it is likely that the equivalent of 2 x FTE officers

(due to significant amount of work) would be required:

- 1 for Trading Standards
- 1 for localities

Costs

Absolute costs cannot be given at this stage because the full scope of the study area is yet to be agreed. The following figures are rough estimates taken from the Burford weight restriction scheme to offer context if a permit scheme-based weight restriction were pursued in Henley-on-Thames.

NB: Choosing a permit rather than an area or fixed-point enforcement system adds significant cost for Henley-on-Thames Town Council.

- Each ANPR camera costs in the region of £2,500.
- 2 x FTE members of staff (+ oncosts) equate to at least £100,000+ per annum.
 - Ongoing costs of monitoring needs human input.
 - This does not include the time of county council employee's input.

The following costs are available from 'Burford Weight Limit' (2019) CMD²:

- The signage for Burford cost £59,049.71.
Plus...
 - £8,857.46 (15% of signage costs) - Signage Project Manager Cost.
 - £19,695 - Signage Removal. If during or at the end of the 18-month experimental period, a decision is made to remove the weight limit, a cost will be incurred for the removal of the signage associated with this scheme.
 - Until the geographical scope of the scheme is established, it is impossible to gauge the cost of signage for Henley-on-Thames.
- £2,000 - Trading Standards Enforcement Training.
- £3,120 - Traffic Regulation Order.
- £75,638.65 approx. – total cost of legal advice (excluding Legal Agreement as it is an hourly rate).
- £2,825 + VAT for the April 2019 traffic surveys, of which there will be 3 more to produce a full data set.

² 'Burford Weight Limit' (2019) CMD: Cabinet Member – 18th July 2019, No. 8. Accessible via: https://mycouncil.oxfordshire.gov.uk/documents/s47938/CMDE_JUL1819R01%20-%20Burford%20Weight%20Limit.pdf

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: Growth & Place

Officer's Name: Dave Harrison

Officer's Title: Senior Public Transport Planner

Date: 11 October 2021

Public Transport Comments

Paragraph 3.27 – the bus service between High Wycombe, Marlow, Henley-on-Thames and Reading currently operates every 20 minutes on Mondays to Fridays, every 30 minutes on Saturdays and hourly on Sundays.

Map on page 15 – as well as the bus services 151-153, it would be useful if other key services could also be shown (X38, 800, 850, 239).

Page 21 – Primary Objective TO2 should be amended to read:

“To ensure that new development supports the Neighbourhood Plan vision by providing cycling, walking and public transport connectivity to the existing network and the town and where possible contributes to improving the existing walking, cycling and public transport networks”.

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: Active Travel Hub

Officer's Name: Joaquim Muntané

Officer's Title: Active and Healthy Travel Officer

Date: 13-10-2021

Active Travel Comments

The pre-submission document was reviewed with a focus on active travel. General comments below:

1. Active travel (walking and cycling) is extensively considered and the document recognises its growing importance; the objectives and actions that deal with active travel are appropriate.
2. However, there are serious inconsistencies between active travel ambitions and other competing objectives – particularly around traffic management and parking. The document fails to recognise that, at its core, any serious promotion of active travel needs to be accompanied by a reduction (not an increase) in the number of cars flowing through and being parked in Henley. Pushing these competing agendas at the same time will probably result in failure for both of them. Specifically:
 - Primary objective TO5 (“To enhance vehicle and car park management, exploring opportunities for additional town centre parking, encouraging use of the station car park, …”) and primary objective RO4 (“To enhance town centre vehicle flows and car park management”) are not compatible with objective TO1 (“To promote active travel; walking, cycling and also public transport as first choice modes for all residents, ensure that children can choose to walk safely to school and to ensure that the services supporting these modes are in place, from high quality safe routes to reliable and sustainable transport services”).
 - Policy H1 (Design Brief) makes good mention of need to connect developments to walking and cycling route (although it could also include the need for convenient walking and cycling infrastructure within the developments); Policy T2 (Active Travel) rightly identifies key priorities; and Policy T3 (Easing Congestion) usefully highlights active travel as a key enabler to reduce car traffic. On the other hand, Policy T6 (Parking and Standards) encourages the provision of car parking and opposes any reduction in designated car parks. It further fails to suggest the possibility of exploring car-free developments where there is appropriate provision of walking, cycling and public transport options.

3. The document would benefit from integrating references to Local Transport Note 1/20 (DfT guidance on cycle infrastructure design), the current Oxfordshire Walking and Cycling Design Standards (currently under review) and an eventual Local Cycling and Walking Infrastructure Plan (LCWIP) for Henley (not programmed yet but likely to be developed during 2022/2023).

For any additional questions / clarification, please contact the Active Travel Hub at activetravel@oxfordshire.gov.uk.

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: Estates

Officer's Name: Jeremy Flawn

Officer's Title: Consultant

Date: 12th October 2021

Estates Comments

Oxfordshire County Council Estates Team welcomes the opportunity to comment on the Henley & Harpsden Neighbourhood Plan.

- Site Y / Policy DS9 (Chiltern Centre) – the delivery of this should not prejudice the delivery of the dwellings allocated on the OCC-owned Site F / Policy DS5 as a result of it's layout / scale and design.
- Site M1 / Policy DS7 (Highlands Farm North Field) – there is a strip of OCC land along the northern boundary. This already appears to be protected through the requirement for a buffer on the northern boundary of the site so there is nothing further to add.

It is noted (Statement of Proposed Modifications) that the three policies where OCC Estates have historically had a specific interest have not changed from the version of the same policies in the previous 'made' neighbourhood plan. These policies are:

- Policy SCI1: Comprehensive Renewal of Gillotts School
- Policy DS3 (Formerly SP11): Gillotts School Field (SITE C)
- Policy DS5 (Formerly SP4): Chilterns End (SITE F)

OCC Estates wishes to comment on two of these policies in particular.

Policy SCI1: Comprehensive Renewal of Gillotts School

As currently drafted, policy SCI1 deals solely with sporting facilities whereas the renewal of the school may have more far-reaching impacts than just the sports facilities. **It is therefore proposed that the policy be re-worded to read as follows:**

"The loss of playing fields at Gillotts School will be supported subject to it resulting in appropriate mitigation to ensure that education and curriculum needs of the school, including sports provision are met."

This revised wording would more fully reflect the requirements in South Oxfordshire Local Plan policy HEN1, which states:

“Policy HEN1: The Strategy for Henley-on-Thames

1. Neighbourhood Development Plans are expected to, and the Council will support development proposals that:

.....viii) support Henley College and Gillotts School to meet their accommodation needs....”

Policy DS5 (Formerly SP4): Chilterns End (SITE F)

OCC Estates has previously sought flexibility in the wording of policy DS5 as follows:

“EITHER

‘around 27 units’ developed as traditional dwellings (as per previous allocation in Neighbourhood Plan policy SP4)

OR

up to 60 Extra Care Housing units (ECH)

AND (in both cases)

up to 10 smaller units (1 and 2 bed) on the front of the site in a more dense form of development.”

In either case, the quantum (37 units or 70 units) would be subject to the affordable housing policies in force at the time of an application.

The August 2021 AECOM Site Options and Assessment Addendum No.2 incorrectly assesses the alternative proposal as a C2 proposal when the above makes clear that OCC Estates has sought Extra Care as an alternative to dwellings (which can be C2 or C3 depending upon the degree of care) but in both cases up to 10 additional smaller dwellings on the front part of the site have been proposed, and it appears that this additional quantum has not been assessed.

OCC Estates is not yet able to confirm whether the site is needed for Extra Care purposes and therefore the current proposal – to amend the policy to allow either up to 37 dwellings (27 on the main part of the site and 10 smaller units at the front of the site) or up to 60 extra care housing units on the main part of the site and up to 10 smaller units (1 and 2 bed) on the front part of the site – remains an appropriate solution and it is recommended that the policy be amended to reflect these options, for the reasons already set out.

In particular, the delivery of a materially significant additional housing site incorporating smaller dwellings and affordable housing, and the potential for the provision of Extra Care Housing instead of some of the dwellings which in turn has the potential to release a significantly larger number of under-occupied dwellings in the locality, would provide a valuable, sustainably located and deliverable allocation site for the Neighbourhood Plan.

District: South Oxfordshire

Consultation: Henley and Harpsden Joint Neighbourhood Plan 2020 – 2035 (Pre-Submission Document)

Team: Sufficiency & Access

Officer's Name: Nicola Jones

Officer's Title: Senior officer

Date: 30-9-21

Education Comments

We will have sufficient school capacity for this scale of growth up to 145 new homes.

ANNEX 1

COUNTY COUNCILLOR COMMENTS

Councillor David Bartholomew
Via email 23/09/21 and 11/11/21.

I am supportive of this plan.

My comments are as follows:

1. I welcome the removal of the inappropriate sites put forward for consideration that were adjacent to Shiplake and far from Henley (13, 14, 878, 1117, New 1, New 2). These would have conflicted with one of the plan's key objectives of preventing the coalescence of Harpsden and Henley.
2. I reluctantly accept the inclusion of site C (formerly site 853A) as a least-worst option, given that environmental damage has already been done on the adjacent site. However, I am concerned about the further increase in traffic pressure on Greys Road, which is already overly congested. Are there further mitigation measures that could be considered? These could include road improvements/widening, more public transport, enhanced walking/cycling connections.
3. I am concerned about the vagueness of Policy H4. Developers continually press for over-intensive infill which damages the character of an area.
4. Why has a very outdated house price chart been included at 3.13? Far more recent data is readily available.
5. The area needs more smaller houses, and while this is dealt with in terms of new housing mix, one key area is ignored, although I accept this may be beyond the remit of the plan. The issue is the over-development of existing small houses. We see many instances of 2-bedroom homes being turned into 3-, 4- or even 5-bedroomed homes and thus put out of the reach of subsequent buyers.
6. The Environmental Weight Limit has not been agreed and will be opposed by me as County Councillor on behalf of all the parishes I represent along – and adjoining – the B481 until it is proven that a weight limit in Henley will not simply deflect HGV traffic on to rural roads.

Joint Henley and Harpsden Neighbourhood Plan

Regulation 14 Consultation – Comments received from statutory consultees and our response

Respondent ID	Name	NP section/ policy/ page being commented on	Summary of response	Change to Plan	Comments
1a	Chris Gaskell: Scottish and Southern Energy	General comment	No comments to make at this time		Noted.
2a	Fergus Campbell: NHS Oxfordshire Clinical Commissioning Group	Objective SO4 General comment	<p>We support the proposed primary objective:</p> <p>SO4 - To work with the Clinical Commissioning Group and Oxfordshire County Council to ensure that the health needs of the whole population are met and plan for future levels of provision and service.</p> <p>In addition, we would add that OCCG would wish to provide increased capacity through development of existing facilities such as the local GP practices. We would request developer contributions as laid out in the Oxfordshire Primary Care Estates Strategy 2020-2025 to enable this.</p>		Noted.

3a	Deb Roberts: The Coal Authority	General comment	The Coal Authority is only a statutory consultee for coalfield Local Authorities. As South Oxfordshire District Council is outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging Neighbourhood Plans.		
4a	Matt Verlander, Avison Young: on behalf of National Grid	DS1/ General comment	Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.		Noted.
5a	Alex Swann: The Environment Agency	General comment	We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have		Noted.

			<p>had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest.</p> <p>For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.</p>		
6a	Grace Lewis: Network Rail	Para 9.61	Set out NR’s support that our long-term planning outputs do not propose cutting the frequency of the service.		Noted.
		Para 9.64 (and section 32.61 of the baseline report) –	A correction is required on usage of Western Route Study forecasts. 99% figure was between 2012 and 2043. Henley growth between 2019 and 2043 was forecast to be 55.5. Regardless, forecasts completed for the Reading to London Paddington Corridor study recently completed, do not	Change first line of text on both paragraphs: Network Rail have confirmed that further to the Network Rail Western Route Study from 2015, rail usage is anticipated to grow by 55.5% between 2019 and 2043. And leave the rest of paragraph	Noted.

			indicate capacity challenges on the Henley branch, even in a non-COVID affected scenario. (This was based from Housing Growth from TEMPRO).	and the reference to the study as they are	
		General comment	<p>NR are keen to work with local authorities on the development of the rail service and how the rail network interacts with the wider transport network. One of the recommendations from the Reading to London Paddington Corridor study was a <i>First Mile Last Mile Principles & Approach</i>:</p> <ul style="list-style-type: none"> • Rail industry partners should work with local stakeholders to agree the principles of engagement on the way in which we can work together to improve access and integration to the wider transport network. • A formal structure should be explored as a means of shaping where and what kind of interventions should take place and when they should be delivered to align to wider local transport plans – this 		Noted.

			<p>could form part of an overall strategy for how the rail network can better integrated with its surrounding areas.</p> <ul style="list-style-type: none"> • This group and this output could then be used to speak with one voice on how to explore funding opportunities from government or third parties. Sub-National Transport Bodies are potentially uniquely placed to lead such a group, given their role in bringing together various aspects of transport planning and strategy – the rail industry should provide support in this endeavour. 		
		General comment	<p>In the case of the provision of additional services, there are significant infrastructure and operational constraints to doing so which were identified in the Western Route Study, including:</p> <ul style="list-style-type: none"> - Running time for a round trip - Single lines 		Noted.

			<ul style="list-style-type: none"> - Level Crossings - Passing loop infrastructure would likely be required 		
		Policy T2 Policy T5	NR supports the requirement for reliable and sustainable transport services, particularly in the context of the railway's role in achieving net-zero carbon emissions by 2050. Again making reference to the above <i>First Mile Last Mile</i> approach.	Add sentence to para 32.63: Work with Network Rail on their 'First Mile Last Mile Principles and Approach' can help review the options available.	Noted.
		HO1	Identify land for new housing as required by the South Oxfordshire Local Plan Policy H3 - Network Rail are committed to working with Local Authorities on understanding new developments and how these can impact the railway. The 2015 Western Route study identified that road & footpath Level Crossings constrain the line speed in the Henley area. Areas with level crossings are challenging and these need to be considered when new housing is planned.		Noted – none of the proposed development sites involve level crossings.
7a	Ben Duffy on behalf of South Oxfordshire District Council	Para 1.7	It is not the Local Plan that does not allow for the Neighbourhood Plan to provide less but rather national policy.	Update wording to: "Any Neighbourhood Plan has the opportunity	Agreed, make suggested changes to wording.

			<p>Paragraph 29 of the NPPF sets out that Neighbourhood Plans “should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”. If the Neighbourhood Plan was to set out less growth than that required by policy H3 of the Local Plan, this would undermine STRAT2: Housing and Employment Requirements which sets out the housing requirement for the district.</p> <p>This paragraph requires amending to reflect that it is national policy that states the Neighbourhood Plan should not promote less development or undermine that which is set out in strategic policies. We have proposed wording below.</p> <p>“Any Neighbourhood Plan has the opportunity to provide more than the proposed number of houses and amount of retail and leisure floorspace set out in the Development Plan, but National Policy states that the Neighbourhood Plan should not promote less growth than that</p>	<p>to provide more than the proposed number of houses and amount of retail and leisure floorspace set out in the Development Plan, but National Policy states that the Neighbourhood Plan should not promote less growth than that required by strategic policies for the area, or undermine those policies”</p>	
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			required by strategic policies for the area, or undermine those policies”		
		Para 2.11	<p>As illustrated in the Planning Practice Guidance the Examiner’s role is to test whether the Neighbourhood Plan meets the basic conditions.</p> <p>When the Examiner considers a proposal for the review of a Neighbourhood Plan, the Examiner must first decide whether the proposed modifications are so significant or substantial as to change the nature of the plan.</p> <p>Where material modifications do not change the nature of the plan (and the examiner finds that the proposal meets the basic conditions, or would with further modifications) a referendum is not required. The district council will be required to decide if the modified plan should be ‘made’ within 5 weeks following receipt of the examiner’s report, or such later date as agreed in writing between the district and the town council.</p> <p>Where material modifications do change the nature of the plan, the</p>	<p>Update wording to: “The Examiner will firstly consider whether the proposed modifications are significant or substantial as to change the nature of the plan. Where material modifications do not change the nature of the plan (and the examiner finds that the proposal meets the basic conditions, or would with further modifications) a referendum will not be required.</p> <p>The district council will be required to decide if the modified plan should be ‘made’ within 5 weeks following receipt of the examiner’s report, or such later date as agreed in writing between the district and the town council.</p> <p>Where material modifications do change the nature of the plan, the district council would publicise and consider the examiner’s report in line with the procedure for making a new neighbourhood plan. The district council would then be</p>	<p>Agreed make suggested changes to wording.</p>

			<p>district council would publicise and consider the examiner’s report in line with the procedure for making a new neighbourhood plan. The district council would then be required to decide whether to proceed to referendum so that, if the referendum is successful, the modified neighbourhood plan becomes part of the development plan.</p> <p>We recommend paragraph 2.11 is updated to reflect the process set out above.</p>	<p>required to decide whether to proceed to referendum so that, if the referendum is successful, the modified neighbourhood plan becomes part of the development plan.”</p>	
		Para 2.12	<p>Planning decisions should be made in accordance with relevant policies in the development plan, which policies in a made NDP are part of, unless there are material considerations that indicate otherwise.</p> <p>We would recommend replacing ‘form the basis of’ with ‘be used to make’</p>	<p>Replace ‘form the basis of’ with ‘be used to make’</p>	<p>Agreed make suggested changes to wording.</p>
		Para 3.17	<p>Reference to the ‘Strategic Housing Market Assessment’ should be stated as ‘Oxfordshire Strategic Housing Market 2014’ for clarity in the document being referred to.</p>	<p>Replace “Strategic Housing Market Assessment” with “Oxfordshire Strategic Housing Market 2014”</p>	<p>Agreed make suggested changes to wording.</p>
		Para 3.21	<p>As paragraph 3.21 contains a now superseded tenure mix we would recommend that the</p>	<p>Update wording to “the updated tenure mix in South Oxfordshire, taking into</p>	<p>Agreed make suggested changes to wording.</p>

			<p>paragraph is deleted, with the table below being added after paragraph 3.23 with an explanation that this is the updated tenure mix in South Oxfordshire taking into account the changes introduced by First Homes.</p> <table border="1"> <thead> <tr> <th>Tenure</th> <th>South Oxfordshire</th> </tr> </thead> <tbody> <tr> <td>First Homes</td> <td>25%</td> </tr> <tr> <td>Social rent</td> <td>35%</td> </tr> <tr> <td>Affordable rent</td> <td>25%</td> </tr> <tr> <td>Other routes to affordable home ownership</td> <td>15%</td> </tr> </tbody> </table>	Tenure	South Oxfordshire	First Homes	25%	Social rent	35%	Affordable rent	25%	Other routes to affordable home ownership	15%	<p>account the changes introduced by First Homes, is shown in the table below.</p> <table border="1"> <thead> <tr> <th>Tenure</th> <th>South Oxfordshire</th> </tr> </thead> <tbody> <tr> <td>First Homes</td> <td>25%</td> </tr> <tr> <td>Social Rent</td> <td>35%</td> </tr> <tr> <td>Affordable Rent</td> <td>25%</td> </tr> <tr> <td>Other routes to affordable home ownership</td> <td>15%</td> </tr> </tbody> </table> <p>“</p>	Tenure	South Oxfordshire	First Homes	25%	Social Rent	35%	Affordable Rent	25%	Other routes to affordable home ownership	15%	
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		Para 3.22	Typo – replace ‘realised’ with ‘released’	Replace “realised” with “released”	Agreed make suggested changes to wording																				
		Policy ENV1: Air Quality	The second sentence in the first paragraph is supporting text rather than policy wording. It provides a non-exhaustive list of examples of harmful pollutants. It is also important to provide references to the WHO and UN information referred to ensure sufficient clarity on the application of the policy. Therefore, we recommend the first paragraph should be	Move to supporting text	Agreed make suggested changes to wording																				

			<p>relocated into supporting text.</p> <p>To help the policy work more effectively with Policy EP1 of the South Oxfordshire Local Plan 2035 and to improve clarity, we recommend that the second paragraph is amended as follows:</p> <p>“All development proposals should include measures to minimise air pollution at the design stage and incorporate best practice in the design, construction and operation of the development.</p> <p>In particular;”</p> <p>Point a) appears to contain a small contradiction. It describes ‘neutral’ as ‘better than’ as opposed to ‘no worse’.</p> <p>Point c) is currently a statement. As point a) effectively covers the aim of point c) this can be removed without affecting the policy.</p>	<p>Replace text with “All development proposals should include measures to minimise air pollution at the design stage and incorporate best practice in the design, construction and operation of the development. In particular;”</p> <p>Replace ‘better than’ as opposed to ‘no worse’</p> <p>Remove Point C</p>	<p>Agreed make suggested changes to wording</p> <p>Agreed make suggested changes to wording</p> <p>Agreed remove this point.</p>
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		Policy ENV2: Biodiversity	<p>In order to ensure that the development does not place over onerous burdens on applicants, we recommend that the wording in part A is amended from “Development should maintain and enhance the natural environment and its intrinsic ecological value. In particular, development is encouraged where it”</p> <p>To:</p> <p>“Development should maintain and enhance the natural environment and its intrinsic ecological value. As appropriate to their nature and scale, development proposals should:”</p> <p>For the same reason we propose that part B is amended from “In order to enhance the environment and biodiversity, proposals for new development or the replacement of existing development are encouraged to include tree and shrub planting, that:”</p> <p>To:</p>	<p>Replace: “Development should maintain and enhance the natural environment and its intrinsic ecological value. In particular, development is encouraged where it”</p> <p>To:</p> <p>“Development should maintain and enhance the natural environment and its intrinsic ecological value. As appropriate to their nature and scale, development proposals should:”</p> <p>Replace: “In order to enhance the environment and biodiversity, proposals for new development or the replacement of existing development are encouraged to include tree and shrub planting, that:” To:</p> <p>“Development should enhance the environment and</p>	<p>Agreed make suggested changes to wording</p> <p>Agreed make suggested changes to wording</p>

			“Development should enhance the environment and biodiversity. As appropriate to their nature and scale, development proposals are encouraged to include tree and shrub planting, that:”	biodiversity. As appropriate to their nature and scale, development proposals are encouraged to include tree and shrub planting, that:”	
		Policy ENV3: Tree	The term any proposal at the beginning of part A of the policy should be more precise. We recommend it is amended to “Proposals that affect existing trees should contain plans for their protection...”	Add “Proposals that affect existing trees should contain plans for their protection...”	Agreed make suggested changes to wording
		Para 5.27	We recommend you add the following considerations to paragraph 5.27. When designating land as Local Green Space it should also be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.	Add “Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period. “	Agreed add additional wording
		Para 5.29	For clarity, it would be helpful to reference the Baseline Report as the document that contains the Topic Papers.	Add: ‘Baseline Report’	Agreed

			It would also be helpful to show maps of each individual Local Green Space allocation as an appendix to the Plan or as part of the Topic Paper.	Add these to Baseline Report.	Agreed
		Policy SD1a: Fabric First Approach	<p>The first sentence of the Policy states “Fabric First required for any development that requires planning permission.” Currently this sentence lacks clarity and is unduly onerous.</p> <p>We would propose this sentence is clarified, and detail added, to state “Commensurate to their size and scale, development proposals should consider a Fabric First approach to its design to minimise its carbon emissions and as a minimum meet the energy efficiency requirements set out in the Development Plan.”</p>	<p>Replace: “Fabric First required for any development that requires planning permission.”</p> <p>With “Commensurate to their size and scale, development proposals should consider a Fabric First approach to its design to minimise its carbon emissions and as a minimum meet the energy efficiency requirements set out in the Development Plan.”</p>	Agreed make suggested changes to wording
		Policy SD1b: Other Methods	<p>The policy states that “If electrical and mechanical means of meeting or exceeding the goal of carbon neutrality are required, then...”</p> <p>Whilst we support the objective of promoting zero carbon through your neighbourhood plan, as currently worded this policy does not have regard to national planning policy and guidance.</p>		

			<p>The Planning and Energy Act 2008 only allows the district council to include policies requiring development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations within development plan documents. Neighbourhood Plans are not development plan documents but form part of the district's development plan. This is consistent with guidance issued by the Secretary of State which states that "qualifying bodies preparing neighbourhood plans should not set in their emerging neighbourhood plans, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings."</p> <p>"...For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans ..."</p> <p>Policy DES10: Carbon Reduction of the South Oxfordshire Local Plan provides the relevant standards. We have also produced a guidance</p>		
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			<p>note on the implementation of Policy DES10 to ensure it is clear what is expected from development proposals.</p> <p>We recommend that the wording of the policy is amended as proposed below, to ensure that it has regard to national policy and guidance “Where electrical and mechanical means are required to meet energy efficiency targets set out in the Development Plan, or any higher standards introduced by National Policy, development proposals are encouraged...”</p> <p>Overall, we believe there is an opportunity for a clearer connection to be made between Policies SD1a and b of the neighbourhood plan and Local Plan Policy DES10.</p> <p>In delivering the standards set out in Policy DES10, Policy SD1a encourages a fabric first approach and where this is not possible, Policy SD1b encourages the incorporation of A to F.</p> <p>This approach is in line with DES10 as set out in paragraph 8.37 of the Local Plan.</p>	<p>Change to: “Where electrical and mechanical means are required to meet energy efficiency targets set out in the Development Plan, or any higher standards introduced by National Policy, development proposals are encouraged...”</p> <p>Add additional wording to introductory text for Sustainable (SD1) policies, add</p>	<p>Agreed make suggested changes to wording</p>
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			<p><i>“The Council encourages developers to take account of the energy hierarchy when identifying the measures taken to reduce carbon emissions and to adopt a fabric first approach by maximising the performance of the components and materials that make up the building fabric before considering the use of mechanical or electrical building services systems. Consideration should also be given to modern methods of construction.”</i></p>	<p>wording; “The following policies SD1a (Fabric First Approach) and SD1b (Other Methods) should be read in conjunction with policy DES10 of the Local Plan. Policy DES10 of the Local Plan includes the requirement for new build residential dwellings, developments including 1,000sqm or more of C2 use or Houses in Multiple Occupation to achieve at least 40% reduction in carbon emissions compared with a code 2013 Building Regulations compliant base case. This reduction is to be secured through renewable energy and other low carbon technologies and/ or energy efficiency measures. The requirement will increase from 31 March 2026 to at least a 50% reduction in carbon emissions and again from 31 March 2030 to a 100% reduction in carbon emissions (zero carbon). These targets will be reviewed in the light of any future legislation and national guidance.</p>	<p>Noted.</p>
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				In delivering the standards set out in Policy DES10 of the Local Plan, Policy SD1a would apply, where this is not possible Policy SD1b should be applied.”	
		Policy SD3: Local Character	Point a is currently a statement rather than policy wording. We recommend the sentence is amended to state “Development should have regard to the importance of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing.”	Replace: “The importance of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing” with “Development should have regard to the importance of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing.”	Agreed make suggested changes to wording
		Policy H1: Design Brief	The first sentences of the Policy state “For all of the allocated sites listed within Policy H1, a Design Brief must be produced for the whole site, setting out the principles for development prior to the submission of a planning application. Development	Replace “For all of the allocated sites listed within Policy H1, a Design Brief must be produced for the whole site, setting out the principles for development	Agreed make suggested changes to wording

			<p>must be implemented in accordance with the principles set out in the Design Brief.”</p> <p>This should be amended to state ““For all of the allocated sites listed within Policy H1, a Design Brief must be produced for the whole site, setting out the principles for development on the submission of a planning application.”</p> <p>The amendment to the first sentence to state a design brief should be submitted on submission of a planning application is because there is not sufficient clarity on how a design brief should be submitted prior to a planning application, and how this would be considered.</p> <p>The second sentence has been removed as the development must be implemented in accordance with the approved planning permissions and associated conditions, not a design brief.</p>	<p>prior to the submission of a planning application. Development must be implemented in accordance with the principles set out in the Design Brief” with ““For all of the allocated sites listed within Policy H1, a Design Brief must be produced for the whole site, setting out the principles for development on the submission of a planning application.”</p>	<p>Noted.</p>
		Policy H2: Affordable Housing	<p>This policy should set out the expected tenure mix for affordable housing that will be sought on major developments.</p>	<p>Replace “In addition to the requirements for affordable housing set out in the Local Plan Policy H9, at least 25% of</p>	<p>Agreed make suggested changes to wording</p>

			<p>The first sentence should be amended to state:</p> <p>“Taking into account the requirements for affordable housing set out in the Local Plan Policy H9, as well as the requirement that at least 25% of all affordable housing units delivered should be First Homes, the affordable housing tenure sought should be in accordance with the table below:</p> <table border="1" data-bbox="829 727 1243 1092"> <thead> <tr> <th>Tenure</th> <th>South Oxfordshire</th> </tr> </thead> <tbody> <tr> <td>First Homes</td> <td>25%</td> </tr> <tr> <td>Social rent</td> <td>35%</td> </tr> <tr> <td>Affordable rent</td> <td>25%</td> </tr> <tr> <td>Other routes to affordable home ownership</td> <td>15%</td> </tr> </tbody> </table> <p>”</p> <p>As the supporting text contains the information on what a First Home is there is no need to contain this in the policy as well.</p>	Tenure	South Oxfordshire	First Homes	25%	Social rent	35%	Affordable rent	25%	Other routes to affordable home ownership	15%	<p>all affordable housing units delivered should be First Homes, discounted market sale units which: a) must be discounted by a minimum of 30% against the market value; b) are sold to a person or persons meeting the First Homes eligibility criteria; c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and, d) after the discount has been applied, the first sale must be at a price no higher than £250,000” with “Taking into account the requirements for affordable housing set out in the Local Plan Policy H9, as well as the requirement that at least 25% of all affordable housing units delivered should be First Homes, the affordable housing tenure sought should be in accordance with the table below:</p>	
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		Para 7.7	<p>This paragraph should be updated to recognise the introduction of First Homes and the impact it has had on the tenure split that will be sought for affordable housing in the district.</p> <p>A sentence should be added to the end of the paragraph that states “However, due to changes resulting from the introduction of First Homes the district policy has effectively been amended, and a tenure split of 25% First Homes, 35% Social Rent, 25% Affordable Rent and 15% other routes to affordable home ownership will now be sought in the district.”</p>	<p>Add the following wording “However, due to changes resulting from the introduction of First Homes the district policy has effectively been amended, and a tenure split of 25% First Homes, 35% Social Rent, 25% Affordable Rent and 15% other routes to affordable home ownership will now be sought in the district.”</p>	<p>Agreed add additional sentence.</p>										

		<p>Policy H3: Housing Type and Mix</p>	<p>We recommend that the policy wording is amended as proposed below to ensure clarity</p> <p>“Proposals for residential development should deliver a mix of dwelling types and sizes to meet the needs of current and future households. Proposals should have regard to local housing need, as evidenced by the Henley and Harpsden Housing Needs Assessment and any future updates.”</p>	<p>Replace: “A mix of dwelling types and sizes to meet the needs of current and future households will be sought on all new residential developments as illustrated through the most up to date housing needs assessment.” with “Proposals for residential development should deliver a mix of dwelling types and sizes to meet the needs of current and future households. Proposals should have regard to local housing need, as evidenced by the Henley and Harpsden Housing Needs Assessment and any future updates.”</p>	<p>Agreed make suggested changes to wording</p>
		<p>Paragraph H4: Infill and Self Build Dwellings</p>	<p>The policy wording should be amended to “Infill housing developments and proposals for the construction of self-build dwellings within the built-up areas of Henley and Harpsden will be supported where it is demonstrated that the proposed development is in accordance other relevant policies of the development plan.”</p>	<p>Replace “Infill housing developments and proposals for the construction of self-build dwellings within Henley and Harpsden will be supported where it is demonstrated that the proposed development constitutes sustainable development” with “Infill housing developments and proposals for the</p>	<p>Agreed make suggested changes to wording</p>

			This is because as currently worded the policy lacks clarity	construction of self-build dwellings within the built-up areas of Henley and Harpsden will be supported where it is demonstrated that the proposed development is in accordance other relevant policies of the development plan.”	
		Policy E1: Supporting Henley’s Economy	The second sentence of the policy is overly restrictive and should be deleted. Policy EMP3 of the Local Plan, Retention of Employment Land, sets out a detailed approach to how employment land will be retained in the district and when it may be appropriate for non-employment uses to be permitted on employment land. This sentence should be deleted	Delete sentence “Non employment generating proposals will not be supported.”	Agreed make suggested deletion of sentence.
		Policy E2: Henley Town Centre	In order to ensure clarity we have proposed amended wording to the policy below. This is to ensure that only appropriate uses are identified by the policy. “Proposals for new retail, leisure, hotel and office development should be located within the	Replace “Proposals for new retail, leisure, hotel and office development should be located within the defined town centre boundary. Development proposals on unallocated sites outside the defined town centre must be in accessible locations” with	Agreed make suggested changes to wording.

			defined town centre boundary. Development proposals for retail, leisure and office uses on unallocated sites outside the defined town centre must be in accessible locations...”	“Proposals for new retail, leisure, hotel and office development should be located within the defined town centre boundary. Development proposals for retail, leisure and office uses on unallocated sites outside the defined town centre must be in accessible locations...”	
		Para 9.12	<p>This paragraph should be amended to state that “The South Oxfordshire Infrastructure Funding Statement sets out how funding received from the Community Infrastructure Levy (CIL) will be allocated. In accordance with this CIL funds may be allocated to transport infrastructure, including strategic highways or transport infrastructure projects (including public rights of way). This includes infrastructure/measures to improve air quality and monitoring.”</p> <p>This is to ensure it accurately reflects the CIL Spending strategy, which can be accessed here</p>	<p>Replace “The CIL Regulation 123 list states that the infrastructure type or projects (to be funded through CIL) on transport will be strategic highways or transport infrastructure projects (including public rights of way). This includes infrastructure/measures to improve air quality and monitoring” with “The South Oxfordshire Infrastructure Funding Statement sets out how funding received from the Community Infrastructure Levy (CIL) will be allocated. In accordance with this CIL funds may be allocated to transport infrastructure,</p>	<p>Agreed make suggested changes to wording.</p>

				including strategic highways or transport infrastructure projects (including public rights of way). This includes infrastructure/measures to improve air quality and monitoring.”	
		Policy T2: Active Travel	<p>Point B of the policy should be reworded to be positively prepared. We have proposed amended wording below.</p> <p>“B. Development proposals that lead to any of the following will not be supported:</p> <p>a) A reduction in the capacity of existing active travel infrastructure;</p> <p>b) A reduction in the safety of active travel infrastructure; or</p> <p>c) A Reduction in the capacity, quality or accessibility of local facilities which support active travel</p>	<p>Replace “B. Development will be resisted where it: A. reduces the capacity of existing active travel infrastructure; B. makes existing active travel infrastructure less safe; or reduces the capacity, quality or accessibility of local facilities which support active travel” with “B. Development proposals that lead to any of the following will not be supported:</p> <p>a) A reduction in the capacity of existing active travel infrastructure;</p> <p>b) A reduction in the safety of active travel infrastructure; or</p> <p>c) A Reduction in the capacity, quality or accessibility of local facilities which support active travel”</p>	<p>Agreed make suggested changes to wording.</p>

		<p>Policy T3: Easing Congestion</p>	<p>To ensure the policy applies to appropriate development, the first sentence should be amended. We have proposed wording below. “Subject to compliance with other policies in the Neighbourhood Plan and elsewhere in the Development Plan, development proposals which have significant transport implications will be supported where it can be demonstrated that:”</p> <p>Point a of the policy should be amended to ensure it has regard to National Policy, specifically paragraph 111 of the NPPF. We have proposed amended text below:</p> <p>“they will not have an unacceptable impact on highway safety, or have severe residual cumulative impacts on the road network, in Henley Town Centre...”</p>	<p>Replace “ Subject to compliance with other policies in the Neighbourhood Plan and elsewhere in the Development Plan, proposals will be supported where it can be demonstrated that” with “Subject to compliance with other policies in the Neighbourhood Plan and elsewhere in the Development Plan, development proposals which have significant transport implications will be supported where it can be demonstrated that:”</p> <p>Replace “they will not severely adversely impact on traffic congestion in Henley Town Centre” with “they will not have an unacceptable impact on highway safety, or have severe residual cumulative impacts on the road network, in Henley Town Centre...”</p>	<p>Agreed make suggested changes to wording.</p> <p>Agreed make suggested changes to wording.</p>
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			<p>Point b of the policy states that “additional opportunities to alleviate traffic congestion on the highway network and through improvements to pedestrian and cycling routes and improvements to public transport have been identified, considered, assessed and will be implemented subject to viability testing in accordance with paragraph 57 of the Framework.”</p> <p>Paragraph 57 of the NPPF sets out the tests for when a planning obligation may be sought, and does not specifically relate to viability. As viability and the weight to be given to its consideration will be a matter for the decision maker viability does not specifically need to be referenced, and can be removed from the end of the sentence.</p>		
		Policy T4: EV Charging Point	There is text in this policy that would be more suitable as supporting text to the Policy.	Remove “Electric vehicle parking spaces should be counted as part of the total parking provision and bays should be clearly	Agreed, remove from policy and move to supporting text.

			<p>The following part of Point A should be moved to supporting text “Electric vehicle parking spaces should be counted as part of the total parking provision and bays should be clearly marked. Charging points should also be included in parking spaces for the disabled and the provision of charging points cannot be used as a reason for why disabled parking spaces cannot be delivered”.</p> <p>Point F is a project rather than a planning policy, and should be moved outside of the policy box</p>	<p>marked. Charging points should also be included in parking spaces for the disabled and the provision of charging points cannot be used as a reason for why disabled parking spaces cannot be delivered”.</p> <p>from policy and move to supporting text.</p> <p>Replace: “It is important that new charging points are included in new and existing car parks.” with “F. New charging points will be encouraged in new and existing car parks to meet the needs of residents and tourists visiting the NPA” from policy and move to supporting text.</p>	<p>Agreed, remove from policy and move to supporting text.</p>
		Policy T5: Public Transport	<p>Point A of the policy should be amended to be positively prepared. We have proposed amended text below. “Proposals on the Henley Railway Station Site should seek to enhance the services, transport links and amenity provided</p>	<p>Replace “A. The existing train and track and land associated with it will be protected from development that would be pre-judicial to the railway, or sustainable transport links and facilities.” With “Proposals on the Henley Railway Station</p>	<p>Agreed make suggested changes to wording.</p>

			<p>Point B relates to bus services. Bus services are not a land use and therefore the policy needs to be amended to be effective. We have proposed wording below.</p> <p>“Development proposals are required to meet the infrastructure and service needs it creates. Where developments are likely to lead to an increased need for bus services, they should make contributions towards these.”</p> <p>C is not a land use policy and should be removed. It may be useful to have a section on projects in the Plan if looking to show these. An example of how this could be done is demonstrated in the Goring Neighbourhood Plan.</p> <p>Following on from our comments on Part C, Part D of the policy should be deleted.</p>	<p>Site should seek to enhance the services, transport links and amenity provided”</p> <p>Replace: “The existing bus services should be protected and supported where possible. In line with SODC policy INF1, developments will be required to contribute to the Bus Services through Section 106 contributions” with “Development proposals are required to meet the infrastructure and service needs it creates. Where developments are likely to lead to an increased need for bus services, they should make contributions towards these.”</p> <p>Remove “C. Improvements to the quality of the public transport serving the town centre will be promoted and encouraged to make public transport safer, more attractive and more convenient to users.”</p>	<p>Agreed make suggested changes to wording.</p> <p>Agreed delete part C.</p>
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			<p>Policy TRANS5 of the Local Plan sets out an approach to access to public transport from developments. We would recommend the wording of point E is amended accordingly. We have proposed amended wording below.</p> <p>“Where appropriate, development proposals should be designed to facilitate access to high quality public transport routes, including safe walking routes to nearby bus stops or new bus stops”</p>	<p>Delete: D. Development will be expected to show how it is contributing to meeting this policy via planning obligations</p> <p>Replace “E. New development should provide access to the existing bus stops or should help to facilitate additional stops. This to be achieved through S106 contributions in line with SODC policy INF1” with “C. Where appropriate, development proposals should be designed to facilitate access to high quality public transport routes, including safe walking routes to nearby bus stops or new bus stops.”</p>	<p>Agreed delete part D.</p> <p>Agreed make suggested changes to wording.</p>
		Policy T6: Parking and Standards	<p>Point D of the policy states that the loss of designated car parks as identified on the policies map will not be acceptable. However, there does not seem to be a designation for this on the policies map on page 23.</p>	<p>Add designated car parks to policies map.</p>	<p>Agreed.</p>

			<p>In addition, having reviewed a similar policy in a Neighbourhood Plan that has passed examination we would recommend changes to the wording of point D, which we have set out below.</p> <p>“Any proposals to develop on existing public car parks within the Plan area will need to demonstrate that the overall number of car parking spaces available to the public and their ease of use is adequate to meet the needs of the town centre and railway station.”</p> <p>As currently worded Point D may be overly restrictive, and we consider the wording proposed above to address this whilst maintaining the aim of the policy.</p>	<p>Replace “Development proposals that would result in the loss of designated Car Parks identified on the Policies Maps will not be permitted. Elsewhere, development proposals that would result in the loss of public car parking facilities which make an important contribution to the local parking provision will not be permitted unless alternative equivalent or better quality provision is made available in a suitable location prior to the commencement of redevelopment” with “Any proposals to develop on existing public car parks within the Plan area will need to demonstrate that the overall number of car parking spaces available to the public and their ease of use is adequate to meet the needs of the town centre and railway station.”</p>	<p>Agreed make suggested changes to wording.</p>
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		<p>Site Allocations</p>	<p>In regard to the site allocations, we note that there are sites that do not accord with policy STRAT5: Residential Densities in the Local Plan. Point 3 of this policy states “Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density”.</p> <p>In particular sites A1, C and DS7 do not appear to have net densities that would accord with policy STRAT5. If there are planning reasons for why sites should have a lower density, these should be explained clearly, as it is important to make efficient use of land allocated for development.</p>	<p>Insert wording to policy DS2: The environment, townscape and heritage constraints have informed the density of this site which is in accordance with Local Plan policy STRAT5.”</p> <p>Insert wording to policy DS3: “The environment and landscape constraints have informed the density of this site which is in accordance with Local Plan policy STRAT5.”</p> <p>Insert wording to DS7: “The site area allows for development at a density which protects the local environment, AONB and SSSI in accordance with policy STRAT5 of the Local Plan. As well as provision of mixed uses and open space, any scheme should provide adequate landscaped buffers.”</p>	<p>Agree.</p>
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8a	Sarah Steere-Smith on behalf of Oxfordshire County Council	General comment	The JHHNP references S106 throughout and it should be considered if some of these references should refer to CIL contributions instead or in addition to S106 as appropriate.		Noted.
		Para 3.22	Should read 'released' not 'realised	Replace 'released' not 'realised	Agreed.
		Para 3.27	The bus service between High Wycombe, Marlow, Henley-on-Thames and Reading currently operates every 20 minutes on Mondays to Fridays, every 30 minutes on Saturdays and hourly on Sundays.	Update to "A frequent (every 20 minutes) Monday to Friday bus service runs to High Wycombe, Marlow, Shiplake and Reading, running every 30 minutes on Saturday and hourly on Sundays."	Noted, update wording.
		Map on p. 15	As well as the bus services 151-153, it would be useful if other key services could also be shown (X38, 800, 850, 239).	Update the Transport Map to show additional bus routes.	Noted.
		TO1	<ol style="list-style-type: none"> 1. Active travel (walking and cycling) is extensively considered and the document recognises its growing importance; the objectives and actions that deal with active travel are appropriate. 2. However, there are serious inconsistencies between active travel ambitions and other 		<p>Noted.</p> <p>Noted.</p> <p>These comments are acknowledged.</p>

			<p>competing objectives – particularly around traffic management and parking. The document fails to recognise that, at its core, any serious promotion of active travel needs to be accompanied by a reduction (not an increase) in the number of cars flowing through and being parked in Henley. Pushing these competing agendas at the same time will probably result in failure for both of them. Specifically:</p> <ul style="list-style-type: none"> - Primary objective TO5 (“To enhance vehicle and car park management, exploring opportunities for additional town centre parking, encouraging use of the station car park, ...”) and primary objective RO4 (“To enhance town centre vehicle flows and car park management”) are 		<p>The principle of these objectives has been brought forward from the existing ‘made’ JHHNP which have been through examination and referendum.</p>
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			<p>not compatible with objective TO1 (“To promote active travel; walking, cycling and also public transport as first choice modes for all residents, ensure that children can choose to walk safely to school and to ensure that the services supporting these modes are in place, from high quality safe routes to reliable and sustainable transport services”).</p> <ul style="list-style-type: none"> - Policy H1 (Design Brief) makes good mention of need to connect developments to walking and cycling route (although it could also include the need for convenient walking and cycling infrastructure within the developments); Policy T2 (Active Travel) rightly identifies key priorities; and Policy T3 (Easing Congestion) usefully highlights active travel as a key 		Noted.
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			<p>enabler to reduce car traffic. On the other hand, Policy T6 (Parking and Standards) encourages the provision of car parking and opposes any reduction in designated car parks. It further fails to suggest the possibility of exploring car-free developments where there is appropriate provision of walking, cycling and public transport options.</p> <p>3. The document would benefit from integrating references to Local Transport Note 1/20 (DfT guidance on cycle infrastructure design), the current Oxfordshire Walking and Cycling Design Standards (currently under review) and an eventual Local Cycling and Walking Infrastructure Plan (LCWIP) for Henley (not programmed yet but</p>	<p>Add reference to Local Transport Note 1/20 (DfT guidance on cycle infrastructure design) in the Baseline Report.</p> <p>Add reference to Walking and Cycling Design Standards (currently under review) and an eventual Local Cycling and Walking Infrastructure Plan (LCWIP) for Henley</p>	<p>Agreed.</p> <p>Oxfordshire Walking and Cycling Design Standards has already been referenced.</p>
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			likely to be developed during 2022/2023)		
		TO2, p. 21	<p>Primary Objective TO2 should be amended to read:</p> <p>“To ensure that new development supports the Neighbourhood Plan vision by providing cycling, walking and public transport connectivity to the existing network and the town and where possible contributes to improving the existing walking, cycling and public transport networks”.</p>	<p>Replace TO2 – “To ensure that new development supports the Neighbourhood Plan vision by providing cycling and walking connectivity to the existing network and the town and where possible contributes to improving the existing walking and cycling network” with “To ensure that new development supports the Neighbourhood Plan vision by providing cycling, walking and public transport connectivity to the existing network and the town and where possible contributes to improving the existing walking, cycling and public transport networks”.</p>	Agreed.
		Policy DS1	<p>Strategic comments</p> <p>Policy H3: Housing in the Towns of Henley-on-Thames, Thame and Wallingford allocates at least 1,285 new homes to Henley on Thames. However, Completions and Commitments as of 1st April 2020</p>		Noted.

			<p>mean the minimum outstanding for the Neighbourhood Plan is 115 new homes.</p> <p>The pre-submission JHHNP allocates two new residential sites (M1: Northern Field at Highlands Farm and Site Y: Chilterns Centre) and six residential allocations carried over from the made (adopted) JHHNP 2012 - 27. These eight sites are as follows:</p> <ol style="list-style-type: none"> 1. Site A1: Land West of Fair Mile. The pre-submission plan increases the dwellings allocated from 60 to 72. We note there is a planning application for 72 dwellings at this site under consideration at the moment by SODC (P19/S2350/FUL). 2. Site C Gillott's School Playing Field. This is allocated for 50 dwellings. <ul style="list-style-type: none"> o This has been assessed by AECOM for 80 dwellings. Page 72 of the pre-submission neighbourhood plan includes 'Policy SCI1: Comprehensive Renewal of Gillotts School'. 		
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			<p>3. Site E: Empstead Works/Stuart Turner. This is allocated for mixed use including 42 dwellings and at least 3,000sqm of town centre mixed use including employment & 1,500sqm for a single format Food Store.</p> <p>4. Site F: Chiltern's End. This is allocated for 27 dwellings.</p> <ul style="list-style-type: none"> o This has been assessed by AECOM as suitable for C2 use. <p>5. Site J: 357 Reading Road. The pre-submission plan has increased the dwelling numbers from 30 to 50 dwellings</p> <ul style="list-style-type: none"> o This has been assessed by AECOM as suitable for 50 dwellings. <p>6. New Site M1 Northern Field at Highlands Farm. The pre-submission plan proposes to allocate this for 110 dwellings.</p> <ul style="list-style-type: none"> o 1ha employment land, relocations of Chilterns Centre <p>7. Site X Henley Youth Club. This is allocated for 23 dwellings.</p> <ul style="list-style-type: none"> o This has been assessed by AECOM for C2 use. 		
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			<p>8. New Site Y: Chilterns Centre. The pre-submission plan proposes to allocate this for 3 dwellings.</p> <p>There is also a site allocated for B1 business activities: Policy DS10: Land at Newtown Road (site AD). These allocations add up to around 377 dwellings which is an additional 145 dwellings compared to the allocations in the existing JHHNP.</p> <p>Education comments We will have sufficient school capacity for this scale of growth up to 145 new homes.</p>		Noted.
		Policy DS2	<p>Transport development control comments This a 'live' planning application. As per previous comments.</p>		Noted.
		Policy DS3	<p>Transport development control comments As per previous comments.</p>		Noted.
		Policy DS4	<p>Transport development control comments</p>		Noted.

			<ul style="list-style-type: none"> • 350m walk to town centre • Within 50m of a bus stop • Access to the site is from Stuart Road and Wilkins Court. • a single format Food Store • Stuart Road is a private road off Greys Road. Access is only wide enough for one vehicle. From the plan it appears Stuarts Road is within the red line boundary. • Wilkins Court can be accessed from both greys Road and Deanfield Avenue. From the plan it appears Wilkins Court is outside the red line boundary. • Applicant would need to demonstrate access is safe and suitable. • The applicant would need to be demonstrate the net change in traffic generation between the existing and proposed land use. 		
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		<p>Policy DS5</p>	<p>Transport development control comments</p> <p>As per previous comments.</p> <p>Estates comments Policy DS5 (Formerly SP4): Chilterns End (SITE F) OCC Estates has previously sought flexibility in the wording of policy DS5 as follows:</p> <p>“EITHER ‘around 27 units’ developed as traditional dwellings (as per previous allocation in Neighbourhood Plan policy SP4)</p> <p>OR up to 60 Extra Care Housing units (ECH) AND (in both cases) up to 10 smaller units (1 and 2 bed) on the front of the site in a more dense form of development.”</p> <p>In either case, the quantum (37 units or 70 units) would be subject to the affordable housing policies in force at the time of an application.</p>		<p>Noted.</p> <p>It is acknowledged that OCC Estates would like flexibility with this policy, however the Committee support residential development for around 27 dwellings on site to help towards delivering housing to address need in the Henley and Harpsden Neighbourhood Area and therefore do not agree to this change.</p>
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			<p>The August 2021 AECOM Site Options and Assessment Addendum No.2 incorrectly assesses the alternative proposal as a C2 proposal when the above makes clear that OCC Estates has sought Extra Care as an alternative to dwellings (which can be C2 or C3 depending upon the degree of care) but in both cases up to 10 additional smaller dwellings on the front part of the site have been proposed, and it appears that this additional quantum has not been assessed.</p> <p>OCC Estates is not yet able to confirm whether the site is needed for Extra Care purposes and therefore the current proposal – to amend the policy to allow either up to 37 dwellings (27 on the main part of the site and 10 smaller units at the front of the site) or up to 60 extra care housing units on the main part of the site and up to 10 smaller units (1 and 2 bed) on the front part of the site – remains an appropriate solution and it is recommended that the policy be amended to reflect these options, for the reasons already set out.</p>		
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			In particular, the delivery of a materially significant additional housing site incorporating smaller dwellings and affordable housing, and the potential for the provision of Extra Care Housing instead of some of the dwellings which in turn has the potential to release a significantly larger number of under-occupied dwellings in the locality, would provide a valuable, sustainably located and deliverable allocation site for the Neighbourhood Plan		
		Policy DS6	Transport development control comments As per previous comments.		Noted.
		Policy DS7	Transport development control comments <ul style="list-style-type: none"> • 2.5km walk to town centre • Within 400m of a bus stop Estates comments		Noted.

			Site M1 / Policy DS7 (Highlands Farm North Field) – there is a strip of OCC land along the northern boundary. This already appears to be protected through the requirement for a buffer on the northern boundary of the site so there is nothing further to add.		
		Policy DS8	Transport development control comments As per previous comments.		Noted.
		Policy DS9	Transport development control comments <ul style="list-style-type: none"> • 1.5km walk to town centre • Within 400m of a bus stop • Existing access is via Chiltern End Close which is narrow. Applicant would need to demonstrate access is safe and suitable. Estates Comments		Noted.

			<p>Site Y / Policy DS9 (Chiltern Centre) – the delivery of this should not prejudice the delivery of the dwellings allocated on the OCC-owned Site F / Policy DS5 as a result of its layout / scale and design.</p>		
		Policy ENV4	<p>Strategic comments</p> <p>Policy ENV4: Local Green Spaces designates 16 Local Green Spaces. However, the plan of these shown in Figure 1 – Proposed Local Green Space Designations is not clear enough for our Estates or Highways team to ascertain if these Local Green Spaces designations are on County Council land. The Baseline Report does unfortunately not contain any individual plans of these sites either.</p> <p>The County Council is the Highways Authority for Oxfordshire. Land which is part of the maintained highway is highway land, and this takes legal precedence over the rights of the sub soil owner and no works can take place without the County</p>	<p>Add Local Green Space Designations maps for each site to the Local Green Space methodology.</p>	<p>No Local Green Spaces are located on County Council Land. Agreed, individual maps should be included within the Baseline Report.</p> <p>Noted.</p>

			<p>Council's approval. The highways status of land means the public have the right to pass and re-pass over it and public utilities has the right to site equipment on or within it. It is unclear how any green space status could affect this, or the ability to carry out any highways works or improvements in the future and we would not want the neighbourhood plan to be considered to fetter this ability in any way.</p> <p>Information on highways land can be found directly on the mapping tool on this webpage: Map of streets we maintain Oxfordshire County Council.</p> <p>If County Council land is included in any Local Green Space (LGS) designation we would have to object to the neighbourhood plan due to the reasons outlined above.</p> <p>It is therefore recommended that individual plan of each of these designations is included in the next iteration of the Baseline Report produced to support the Submission JHHNP and any County Council land or land which is part of the maintained highway is</p>	<p>Add Local Green Space Designations maps for each site to the Local Green Space methodology.</p>	<p>Agreed.</p>
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			<p>excluded from any of these Local Green Spaces designations. Four designations in particular need reviewing:</p> <ul style="list-style-type: none"> • Sites 31 Millennium Woods and 19 Gillott’s Wood – both potentially impinge on the OCC-owned bridleway running to the north of the proposed LGSs and therefore it would be sensible to ensure that the LGS designation excludes the bridleways which – using the methodology employed by the NP Steering Group – are already protected by the bridleway’s right of way status. • Sites 21 Corner of Harpsden Road and Sheephouse and 35 Harpsden Court– because of the poor quality of the LGS location plan and lack of individual plans for each proposed LGS site, it is not possible to determine whether these two adjoining sites include or exclude OCC-owned land within and adjacent to the public highway. As these small parcels of land are held for functional highway purposes it would be sensible to exclude them from the LGS designations in all 		<p>Noted.</p> <p>These do not include OCC owned land.</p>
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			cases, so that the LGS boundaries are drawn tightly around the wooded areas that they purport to protect.		
		Policy H1	Design Brief text refers to all of the sites listed in the policy but then does not list any sites. Perhaps this should refer to policy DS1.	Replace “H1” with “DS1”	Agreed.
		Policy T3	Easing Congestion references ‘paragraph 57 of the Framework’ without further explanation as to which Framework is being referred to.	This sentence to be removed in line with comments from SODC.	Noted.
		Policy SCI1	<p>Estates Comments</p> <p>As currently drafted, policy SCI1 deals solely with sporting facilities whereas the renewal of the school may have more far-reaching impacts than just the sports facilities. It is therefore proposed that the policy be re-worded to read as follows:</p> <p>“The loss of playing fields at Gillotts School will be supported subject to it resulting in appropriate mitigation to ensure that education and curriculum needs of the school, including sports provision are met.”</p>		Disagree with proposed changes to this policy. This is a saved policy that has been brought forward from the existing ‘made’ neighbourhood plan.

			<p>This revised wording would more fully reflect the requirements in South Oxfordshire Local Plan policy HEN1, which states:</p> <p>“Policy HEN1: The Strategy for Henley-on-Thames 1. Neighbourhood Development Plans are expected to, and the Council will support development proposals that:viii) support Henley College and Gillotts School to meet their accommodation needs....”</p>		
		Appendix A and Baseline Report	<p><u>Strategic comments</u></p> <p><u>Environmental Weight Limit:</u></p> <p>The current wording regarding a possible environmental weight limit in Henley in the neighbourhood plan is incorrect and requires re-writing. An incorrect date is referred to and the wording describing what was agreed has attempted to paraphrase the Council motion resulting in a misrepresentation of what has been agreed. It is essential that the wording regarding the Council motion is correct and given that this</p>	<p>Update text Appendix A and the Baseline Report to: There was an OCC Cabinet motion approved on 7th April 2021 to undertake the necessary studies for an environmental weight restriction for Henley: “RESOLVED: (40 votes for, 3 votes against and 15 abstentions) The County Council will consider environmental weight restrictions ... and would not fall on the OCC.”</p>	<p>Comments noted and acknowledge that this reference needs to be updated.</p>

			<p>text is in appendix to the Neighbourhood Plan it seems appropriate that the full text of the Council motion is included to avoid any confusion. The full text can be found in our Transport Strategy Comments later in this response.</p> <p>The current incorrect wording in the pre-submission JHHNP in Appendix A and the Baseline Report is:</p> <ul style="list-style-type: none"> • Appendix A, point B on page 88 states a Priority Project in the JHHNP is: <i>'HGV environmental restriction – on 23 March OCC agreed in principle, subject to funding being found, and completion of the necessary studies, to an environmental weight restriction on HGVs travelling through Henley'</i>. • The Baseline Report Topic Paper 1 states the same point slightly differently (page 15, paragraph 7.39) <i>'On 23 March OCC agreed in principle to an environmental weight restriction on HGVs travelling through Henley, subject to funding</i> 		
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			<p><i>being found, and completion of the necessary studies.'</i></p> <p>The wording in the NP must be revised to accurately reflect that there was an OCC Cabinet motion approved on 7th April 2021 to undertake the necessary studies for an environmental weight restriction for Henley. This would include an assessment of the impact on other crossings of the Thames and of alternatives, and ultimately a recommendation on the feasibility and appropriateness of imposing an environmental weight restriction. It should be made clear that whilst OCC have agreed (subject to funding) to undertake the necessary studies, no commitment to implement an environmental weight limit has been made; such a decision would depend on the results of the studies and other considerations.</p> <p>On 7th April 2021 OCC's Cabinet resolved to:</p> <p><i>'The County Council will consider environmental weight restrictions across the County, particularly areas which are subject to</i></p>		
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			<p><i>significant levels of HGV traffic, prioritising the towns of Burford, Chipping Norton and Henley-on-Thames. However, the county council is very unlikely to have any funding available for this in the coming years so any schemes would need to be funded through development and/or by local communities, businesses and town/parish councils.</i></p> <p><i>This policy clearly states that Henley is subject to significantly high levels of HGV traffic. Henley is also an AQMA area which means we have significant pollution.</i></p> <p><i>Council calls upon the Corporate Director for Environment and Place to complete the necessary studies for an environmental weight restriction for Henley, in the event that funding to cover the whole cost is secured through development and/or by local communities, businesses and town/parish councils and would not fall on the OCC.'</i></p> <p>Transport Strategy comments</p>		
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			<p><u>Henley-on-Thames environmental weight restriction proposal.</u></p> <p>The proposed draft joint Henley and Harpsden Neighbourhood Plan states: Appendix A, point B on page 88 states a 'Priority Project' in the JHHNP is: <i>'HG V environmental restriction – on 23 March OCC agreed in principle, subject to funding being found, and completion of the necessary studies, to an environmental weight restriction on HGVs travelling through Henley'</i>. and The Baseline Report Topic Paper 1 states the same point slightly differently (page 15, paragraph 7.39) <i>'On 23 March OCC agreed in principle to an environmental weight restriction on HGVs travelling through Henley, subject to funding being found, and completion of the necessary studies.</i></p> <p>The above statements from the proposed Neighbourhood Plan are incorrect and misleading; on 7th April 2021 OCC's Cabinet resolved to (emphasis added in bold):</p>		
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			<p>'The County Council will consider environmental weight restrictions across the County, particularly areas which are subject to significant levels of HGV traffic, prioritising the towns of Burford, Chipping Norton and Henley-on-Thames. However, the county council is very unlikely to have any funding available for this in the coming years so any schemes would need to be funded through development and/or by local communities, businesses and town/parish councils.</p> <p>This policy clearly states that Henley is subject to significantly high levels of HGV traffic. Henley is also an AQMA area which means we have significant pollution.</p> <p>Council calls upon the Corporate Director for Environment and Place to complete the necessary studies for an environmental weight restriction for Henley, in the event that funding to cover the whole cost is secured through development and/or by local communities, businesses and town/parish councils and would not fall on the OCC.'</p>		
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			<p>The wording in the NP must be revised to accurately reflect that there was an OCC Cabinet motion approved to undertake the necessary studies for an environmental weight restriction for Henley. This would include an assessment of the impact on other crossings of the Thames and of alternatives, and ultimately a recommendation on the feasibility and appropriateness of imposing an environmental weight restriction. The principle of an environmental weight restriction for Henley has not been agreed.</p> <p><u>Details of Member’s decision</u> Details of the original proposal – County Council Member’s meeting, Tuesday 23 March 2021 10:00am – can be found here</p> <p>The motion was amended and then carried with 40 votes for, 3 votes against and 15 abstentions at County Council Member’s meeting, Wednesday 7 April 2021, 10:00am, details of which can be found here</p> <p><u>Necessary studies to assess the feasibility and appropriateness of</u></p>		
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			<p><u>imposing an environmental weight restriction</u></p> <p>Representatives from OCC, including officers and Cllr Gawrysiak, and from Henley-on-Thames Town Council met on 16th August 2021 to discuss the issue further. A full summary of those discussions, as well as a detailed report produced by OCC officers was shared with the meeting's attendees on Wednesday 13th October 2021.</p> <p>It stated the following, including but not limited to:</p> <ul style="list-style-type: none">• Advice to Henley-on-Thames Town Council was given in the context of paragraph 18 of OCC's current Transport Plan as follows: "Our policy on new environmental weight limits is that it would first be necessary to establish that a particular location has a problem in terms of environmental and economic impacts as reflected in congestion, air quality, road danger and public concern. It would then be necessary to identify the share of HGV traffic that does not constitute local access based on origin and		
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			<p>destination surveys and other data, as well as analysis of alternative routes. Consideration of weight limits would also need to have reference to the road hierarchy set out earlier in this Local Transport Plan”¹</p> <ul style="list-style-type: none"> • Establishing the geographical parameters of a scheme are a prerequisite to any other works. • The extent to which Henley-on-Thames is used as a through-route needs to be fully understood and evidenced. • Survey work needs to be funded by Henley-on-Thames Town Council (or third parties) as the scheme is beyond the budget of OCC. • OCC has a responsibility to all highway users, therefore any limitation of particular vehicles/road users must be properly evidenced and deemed necessary. • Mapping and modelling all alternative routes – including multiple drop-offs and end-to-end modelling – is required, particularly if a permit scheme was 		
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¹ Oxfordshire Freight Strategy’ (2015) Connecting Oxfordshire: Local Transport Plan 2015 – 2031. Accessible via: https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting_oxfordshire/county-and-corridor-strategies

			<p>sought which incites significant cost and works.</p> <ul style="list-style-type: none"> • Officers recommend avoiding a 7.5t restriction: <ul style="list-style-type: none"> - OCC recommend considering an 18- rather than a 7.5-tonne restriction, because the former is simpler and more cost effective and will largely achieve the same outcomes. - Any vehicle weighing 18 tonnes or more has at least three axles, which is why classifying 18+ tonne vehicles is simpler and more cost effective. • Officers recommend considering the implications of having a permit scheme, because in most weight restrictions they are not used. They can be difficult to define and costly to manage. <ul style="list-style-type: none"> - For reference, Burford and Suffolk are the only two places in the UK to have a permit scheme for a weight restriction, with Burford's being an active experiment rather than a permanent scheme. 		
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			<ul style="list-style-type: none"> • Relevant stakeholder engagement is necessary. • Henley-on-Thames Town Council will have to seek delegated authority by OCC for enforcement. • Henley-on-Thames Town Council will need to pay for all signage for an ETRO and in the future for a permanent scheme if introduced. <ul style="list-style-type: none"> - Any current signage that directs traffic to Henley-on-Thames would need new signage to incorporate the weight restriction, for example including on the A34 and Oxford ring road. • If a vehicle weight restriction were to be progressed via an ETRO and then an TRO in Henley-on-Thames, it is likely that the equivalent of 2 x FTE officers 12 (due to significant amount of work) would be required: <ul style="list-style-type: none"> - 1 for Trading Standards - 1 for localities <p><u>Costs</u></p> <p>Absolute costs cannot be given at this stage because the full scope of the study area is yet to be agreed. The following figures are rough estimates taken from the Burford</p>		
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			<p>weight restriction scheme to offer context if a permit scheme-based weight restriction were pursued in Henley-on-Thames.</p> <p>NB: Choosing a permit rather than an area or fixed-point enforcement system adds significant cost for Henley-on-Thames Town Council.</p> <ul style="list-style-type: none"> • Each ANPR camera costs in the region of £2,500. • 2 x FTE members of staff (+ oncosts) equate to at least £100,000+ per annum. o Ongoing costs of monitoring needs human input. <ul style="list-style-type: none"> - This does not include the time of county council employee's input. - <p>The following costs are available from 'Burford Weight Limit' (2019) CMD2² :</p> <ul style="list-style-type: none"> • The signage for Burford cost £59,049.71. Plus... <ul style="list-style-type: none"> - £8,857.46 (15% of signage costs) - Signage Project Manager Cost. o £19,695 - Signage 		
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² Burford Weight Limit' (2019) CMD: Cabinet Member – 18th July 2019, No. 8. Accessible via: https://mycouncil.oxfordshire.gov.uk/documents/s47938/CMDE_JUL1819R01%20-%20Burford%20Weight%20Limit.pd

			<p>Removal. If during or at the end of the 18-month experimental period, a decision is made to remove the weight limit, a cost will be incurred for the removal of the signage associated with this scheme. o Until the geographical scope of the scheme is established, it is impossible to gauge the cost of signage for Henley-on-Thames.</p> <ul style="list-style-type: none"> • £2,000 - Trading Standards Enforcement Training. • £3,120 - Traffic Regulation Order. • £75,638.65 approx. – total cost of legal advice (excluding Legal Agreement as it is an hourly rate). • £2,825 + VAT for the April 2019 traffic surveys, of which there will be 3 more to produce a full data set. 		
9a	Rebecca Micklem on behalf of Natural England	Policy DS7	This policy allocates land for development of 110 homes within the Chilterns AONB and directly adjacent to Highland Farm Pit SSSI. We advise that, as has been noted in section 11.32, the		Noted.

			<p>palaeolithic archaeology found within the SSSI is likely to extend within the allocation area.</p> <p><u>Landscape:</u></p> <p>In order to meet the basic conditions test, the Neighbourhood Plan must have regard to national policies. Paragraphs 176 and 177 of the National Planning Policy Framework give the highest status of protection for the ‘landscape and scenic beauty’ of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.</p> <p>It is not for Natural England to comment on the need for the development, and the impact of permitting it, or refusing it, upon the local economy, or the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way. However, we advise that these aspects of paragraph 177 of the NPPF must have be fully addressed.</p>		<p>Noted: Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the results of each site assessment. Furthermore, the effect on the environment would be moderated by a number of requirements listed in the policy including the</p>
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			<p>With regard to assessment of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated; we do not consider this to have been sufficiently addressed at this allocation. We note that the Landscape Capacity Assessment for Sites on the Edge of the Four Towns in South Oxfordshire which formed part of the evidence base for the South Oxfordshire Local Plan assessed at a high level the capacity of this site to accommodate housing. However, this report recommended a full detailed landscape and visual impact assessment would be essential to inform the final capacity of the site in landscape terms.</p> <p>It is stated in the draft Plan that the landscape sensitivity of the site has been influenced by the development of Site M to the South of the site. However, the development at Site M is self-contained, maintaining the settlement pattern of the countryside in this part of the landscape setting of Henley. We</p>		<p>requirement for a landscape and visual impact assessment and a design Brief to incorporate and reinforce existing landscaping, green infrastructure and biodiversity features. It is not considered appropriate to require a landscape and visual impact assessment until the planning application stage when detailed proposals can be considered. With regards to the NPPF Paragraph 177, it is demonstrated through the 2020 Housing Needs Assessment that there is considerable need for affordable housing in the Neighbourhood</p>
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			<p>disagree with the statement in the Site Options and Assessment Report that the site is within the built area, and consider that development of the Northern Field at Highlands Farm would result in expansion of housing into the wider countryside, not in-keeping with the landscape character of the Chilterns Plateau with Valleys area.</p>		<p>Area, this is considered to constitute an exceptional circumstance and this would be in the public benefit. Local Plan policy H3 states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. Site M1 would bring forward the greater number of affordable housing required for the area than this site. The site would also bring forward</p>
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			<p>We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the plan.</p> <p><u>Highlands Farm Pit SSSI and palaeolithic archaeology:</u></p> <p>A buffer strip would be needed on the north side of Highlands Farm Pit SSSI where there would be no development on or disturbance of the ground, in order to maintain access to the SSSI for conservation of the sediments and any future investigation of the interest features. Without the buffer zone, development close to the crest of the pit faces could result in the instability of the built structures, and the need to stabilise the face, possibly with a structure that permanently excludes access.</p> <p>It is highly likely that geological interest and the Palaeolithic archaeology extend into the proposed area of the site allocation; we agree with the</p>	<p>Insert; j) Protects and enhances the SSSI, including a buffer strip on the north side of Highlands Farm Pit SSSI.</p> <p>Add the following to the supporting text "A geological survey should be undertaken by a contractor with specific</p>	<p>other public benefit including social benefit through community led housing and the relocation of the Chiltern Centre and economic benefit through 1h of employment land.</p> <p>Noted, Chiltern Conservation Board have been consulted.</p> <p>Noted.</p>
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			<p>need, identified in the policy, for geological survey. This should be undertaken by a contractor with specific palaeolithic expertise; the extent of the geological and archaeological interest may influence the pattern and quantum of development that is suitable for the site.</p>	<p>palaeolithic expertise. The extent of the geological and archaeological interest may influence the pattern and quantum of development that is suitable for the site.”</p>	<p>Noted.</p>

Joint Henley and Harpsden Neighbourhood Plan

Regulation 14 Consultation – Comments received from local groups, organisations, and businesses

Respondent ID	Name	NP section/ policy/ page being commented on	Summary of response	Change Plan?	Comments
1b	D. Bertelli; C. Wright; M. Quinsac; J.Hutchinson; H&O Karim; S. Deacock (committee members) on behalf of Save Henley's Green Spaces	Policy DS3	<p>As of 10.11.21 2282 people had signed a petition on change.org to Prevent Developments at Lucy's Farm & Gillotts Sports Field.</p> <p>64 written comments made to the online petition between 9 February 2021 and 10 July 2021 were included in the Regulation 14 consultation submission – these are listed below.</p> <p>The destruction of these two beautiful green sites, the development of which will only further add to the overburdening of our social services, doctors' surgeries and schools; and overall traffic chaos and air pollution in Henley.</p> <p>We DO NOT need more luxury housing projects being ushered in under the pretext of 'affordable housing'.</p> <p>We DO need a more creative solution to our social housing requirements - developing brown field and vacant commercial sites, for example - and for our</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM. We</p>

			<p>elected representatives to hear and act upon our democratically-voiced concerns.</p>		<p>have received confirmation from the doctors and schools that there is capacity. OCC the Highway Authority have raised no objection to this site. This will still need to be subject to a planning application and the proposal would need to accord with the development plan and therefore need to satisfy the policy requirements of the Local Plan and the JHHNP. The Neighbourhood Plan has strong policies on transport and air quality. All sites were considered as part of a comprehensive process and suitable sites have been put forward for allocation. There is very little previously developed land left in and around Henley which inevitably means that new location (s) for development are on the edge of town on greenfield sites.</p>
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					<p>Site 1126 Lucy's Farm was assessed by independent professional consultants AECOM and deemed to be unsuitable. The assessment found that the site would not be suitable for allocation in the Neighbourhood Plan as it does not meet local policy. The site is adjacent rather than within the built - up area. There are also a number of other constraints that impact the sites suitability including access and potential risk of coalescence between Henley and Harpsden. A primary objective is to ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other.</p>
2b	S Tipple on behalf of John Hodges Trust for Harpsden Hall	Policy ENV4	The John Hodges Trust for Harpsden Hall owns land, specifically Harpsden Cricket Ground, which is listed in the Draft Neighbourhood Plan and which is proposed as a designated Local Green Space. The provision and maintenance of outdoor sporting facilities are core aims of the Trust and were one of the key objects of the Trust's founder, John		Noted.

			Hodges, as mentioned in the Trust Deed. As such, the Trustees note and agree with the designation of Harpsden Cricket Ground as a Local Green Space.		
3b	J Smewing and M Loring on behalf of Henley Community Land Trust Steering Group	Section 10	<p>Requested change: include support for a Community Land Trust, either as a freestanding policy or as an addition to SCI3, currently Community Right to Build – maybe rename as Community Initiatives.</p> <p>Reason for change: The Henley and Harpsden Housing Needs Assessment (HNA) prepared by Aecom in January 2020 notes (para 13) “The scale of Affordable Housing need identified here is far in excess of the level of supply that can be expected based on either the policy requirement or past performance. On this basis, the community may wish to boost the supply of Affordable Housing in other ways, such as an entry-level exception site, community development order or land trust.” Moreover, the Developer Presentation in respect of Site M1 expresses a “Willingness to cater for and work with a Community Land Trust”.</p> <p>Topic Paper 2, Housing, notes in para 11.4: “The evidence from consultation suggests it would be appropriate to support Community Led Housing in the NPA and/or to have policy to support delivery of affordable housing.” Primary Objective HO5 is to: “Explore opportunities to address local needs and maximise affordable housing delivery.” A community land trust constitutes one such opportunity and should be explored.</p>	<p>Add additional wording to supporting text for Policy SCI3.</p> <p>The formation of a Community Land Trust for Henley will be supported.</p> <p>Also add a definition of Community Land Trust in the Glossary.</p>	This is not a land-use matter and therefore cannot be included as a policy, however this can be referenced as an aspiration in the supporting text.

			<p>Suggested text for new CLT policy:</p> <p>Community land trusts – or CLTs – are democratic, non-profit organisations that own and develop land for the benefit of the community. They typically provide affordable homes, community gardens, civic buildings, pubs, shops, shared workspace, energy schemes and conservation landscapes. They are community organisations run by ordinary people who want to make a difference to their local community, putting control of assets into the hands of local people. They can be set up by the community or a landowner, developer or council. They ensure that their homes are permanently and genuinely affordable. CLTs act as long-term stewards of land and the assets on it. They ensure the land is used to the benefit of the local community, not just for now but for every future occupier.</p> <p>Policy SCI5: Community Land Trust. The formation of a Community Land Trust for Henley will be supported.</p>		
		Policy DS7	<p>Requested change:</p> <p>Add under “is allocated for:” f) relocation and redesign of the community centre and the employment facilities from existing allocation site M, Highlands Farm.</p> <p>Reason for change: The existing allocation site, M in the 2016 JHHNP, provides for a community centre.</p>	<p>Add following wording “f) relocation and redesign of the</p>	<p>Agree to additional wording on redesign of the community centre and the employment facilities.</p>

			<p>However, Topic paper 5 Infrastructure para 6.64 Item n) under Areas of Concern notes: “Highlands Park sports / community centre: as yet it has not been possible to find an organisation willing to take responsibility for the management of the Highlands Farm sports and community centre.”</p> <p>One of the many reasons for this is that the AONB precludes fencing at Highlands, but sports clubs are unwilling to deal with the safety issues presented by unfenced pitches. There is no requirement from clubs for changing rooms and thus no need to site the building close to the pitches.</p> <p>The developer presentation for this site lists as part of their emerging vision: “Re-location and re-imagination of employment and community facilities”. And their summary notes: “Opportunity to relocate the commercial and community uses to the northern phase”.</p> <p>This proposal from the developer should be welcomed, as a redesigned, more flexible community facility close to Greys Road will attract more use. In addition, safety will be improved by removing the need for users to drive through the entire Highlands Park housing estate. The employment facilities should also be moved for the same reasons, and because it is envisaged that the community and employment facilities will share parking provision.</p>	<p>community centre and the employment facilities from existing allocation site M, Highlands Farm.”</p>	
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4b	D Gorsuch on behalf of Gillotts School	SO1-SO3	<p>As described in SO1 - SO3, the plan identifies a need for leisure and sporting opportunities.</p> <p>However, as recognised in the Baseline report, Topic paper 5 – Infrastructure, section 42, the opportunities for providing additional facilities are very limited. The paper identifies a particular, unmet need for a hockey pitch and tennis courts and points out that there is currently no prospect of providing either. The renovation of Gillotts school, which would be financed by the development of ‘Site C Gillotts school playing field’, would deliver first class sporting facilities for community use, including an all-weather hockey pitch and tennis courts.</p>		Noted.
		Policy SCI1	<p>Para 10.1 specifies that "In the case of Gillotts School, any loss of playing fields must result in an enhanced alternative sports provision which overall better meets the needs of the children at the school and the community as a whole."</p> <p>The plans for renovation put forward by the school involve provision of first-class sporting facilities, materially superior to those currently in use at the school, including a multi-use games area for year-round playing of netball and tennis and a full-size synthetic turf pitch for year-round football training and hockey. The grass pitches would all be levelled and re-seeded.</p> <p>Para 10.2 specifies that the development of Site C should ensure that the site is screened from the</p>		Noted.

			<p>adjacent AONB and make provision for community use of school facilities.</p> <p>No plan yet exists for development of 'Site C' but it is accepted that the existing trees to the south, which effectively screen the site from the Harpsden valley, will be retained. Community use of the school facilities, including the sporting facilities and potentially the new school hall, are an integral part of the proposal.</p>		
		Policy ENV4	<p>19) Gillotts Wood</p> <p>The area referred to as 'Gillotts Wood' is:</p> <ul style="list-style-type: none"> • Not accessible to the local community or the public as indicated in the table in this section, being part of the school site and therefore private property. • Neither tranquil nor rich in wildlife, being part of a noisy and busy school and with the road to the school's staff car park running through it. • Is not the subject of a Tree Preservation Order and does not contain any trees that are considered of sufficient value to be subjects of Tree Preservation Orders. <p>We therefore consider that the area does not qualify for designation as a 'Local Green Space'. The South Oxfordshire Local Plan 2035 (Policy HEN1: The Strategy for Henley-on-Thame) includes:</p>		<p>Disagree, Public access is not pre-requisite for a Local Green Space designation. The PPG states that other land could be considered for designation even if there is no public access. It is noted that there is a bridleway that runs adjacent to the wood.</p> <p>This site has been put forward for consideration for LGS and is considered to be meet the tests set out in the NPPF (Paragraph 101 and 102) due to having a particular local significance because of its tranquility and richness of wildlife. It</p>

			<p>“support [for] Henley College and Gillotts School to meet their accommodation needs”.</p> <p>As demonstrated above, the land referred to as ‘Gillotts Wood’ is not appropriate for designation as Local Green Space. If the designation were to be made, it would further constrain what is already a complex rejuvenation plan and indeed could threaten significant aspects, such as ensuring community access to the enhanced sporting facilities.</p>		<p>provides an important green corridor connecting adjacent green spaces. This is set out in the Baseline Report.</p>
		<p>Policy DS1/ Baseline Report p. 148</p>	<p>The unique feature of this site is that all the money raised from sale of the land will be invested in renovation of Gillotts school, Henley’s only community secondary school, to provide an optimal environment for teaching and learning in the 21st century.</p> <p>As referred to in the Baseline report, (Topic paper 5 – Infrastructure, Utilities: water and sewage, Areas of concern), "C Some of the buildings on the Gillotts site are old and need replacing to provide a good quality teaching and learning environment". Sale of the site and the renovation of the school it would enable would address this issue and there is no other way to finance the project.</p> <p>In the same section of the Baseline report, we read “F) Fear that the age profile in the town will become even more unbalanced. (In section 3 of the Pre-submission (Regulation 14) Draft report, we read that the town’s population of 15-44 year olds has declined by 17% in the past 10 years) as more</p>		<p>Noted.</p>

			<p>accommodation for the elderly is built at the expense of mainstream housing. High prices for houses and very high rents mean that fewer young people can afford to live in the town.</p> <p>The vision of Henley as a vibrant prosperous mixed community could become impossible to achieve". A secondary school with top-quality facilities would be a valuable contributor to the goal of encouraging younger people to move to the town.</p> <p>The South Oxfordshire Local Plan 2035 (Policy HEN1: The Strategy for Henley-on-Thame) includes: "support [for] Henley College and Gillotts School to meet their accommodation needs". At no point in the process to develop and revise the JHHNP has any viable alternative to the allocation of Site C, to achieve policy HEN1, been put forward. Section 11.2 states that, when the renovation of the school takes place, "Exemplary replacement sports facilities are expected,...".</p> <p>The plans for renovation put forward by the school involve provision of first-class sporting facilities, materially superior to those currently in use at the school, including a multi-use games area for year-round playing of netball and tennis and a full-size synthetic turf pitch for year-round football training and hockey.</p> <p>Making these facilities available for wider community use is an integral part of the plan. The grass pitches would all be levelled and re-seeded. Not mentioned in this section is the fact that</p>		
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			support of Gillotts' school's infrastructure needs is a key element of the South Oxfordshire Local Plan 2035 (Policy HEN1). No way of achieving this, other than selling the little used part of the school's estate which constitutes Site C, has been identified.		
		Pre-submission baseline report, para 39.8 – Secondary Schools	<p>This information in this section is now out of date. The current roll of the school is 920, so the school is now 20 pupils over capacity.</p> <p>There is no indication of funds from central government available to pay for maintenance, improvement or expansion of the school or indeed from elsewhere. Sale of the identified land for development is the only way to set the school up to meet the needs of Henley's young people in the future.</p>	Update para 39.8	Noted.
5b	C Buchanan, First City Limited on behalf of Henley Enterprise Park Limited	Policy DS1	We support the allocation of site E: Empstead works/Stuart Turner within the emerging neighbourhood plan as a mixed-use site including residential.		Noted.
		Policy DS4	<p>Again, we support the allocation of the site in the emerging Neighbourhood Plan.</p> <p>It is acknowledged that this is an existing allocation from the current adopted plan and is proposed to roll forward.</p> <p>We understand the concern raised in paragraph 11.17 of the site being located within close proximity to, but outside of the conservation area. However, as stated in paragraph 11.19, "the site has significant potential to enhance the town centre and employment offer, as well as</p>		Noted.

			<p>contributing to town centre living”, therefore creating an opportunity for a much-improved visual appearance to the current older industrial properties located to the north west of the site (Empstead Works).</p> <p>Policy DS4 identifies the potential for the site to accommodate around 42 dwellings and at least 3,000sqm of town centre mixed uses including employment and 1,500sqm food store. Our client has no objections to the principle of providing such uses on site however, it is important to acknowledge that a level of flexibility is required within all policies proposed in accordance with NPPF paragraph 82 d) of chapter 6. Building a strong, competitive economy, which states, “Planning policies should: d) be flexible enough to the site for as long as this is required.</p> <p>The Stuart Turner building is a fairly recent construction of good quality and accommodates a company with a long history in Henley. However, if that company should choose to depart from the site, there may be potential for the premises to be utilitised for alternative employment uses and sub-divided to create several smaller units to cater for the employment needs of the town.</p> <p>The Empsteads Works part of the site is a collection of older units which are not in keeping with the character and the visually attractive surrounding area. This part of the site has the potential to be redeveloped in the short to medium term and therefore we consider there is scope for the site to</p>		<p>Noted.</p> <p>Noted.</p>
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			<p>be developed in phases to allow for a level of flexibility.</p> <p>We therefore consider the policy should be worded as such:</p> <p>Policy DS4: Empstead Works/ Stuart Turner (Site E) The Empstead Works/ Stuart Turner site (as shown on site E location diagram) is allocated for:</p> <p>a) A minimum of 42 dwellings; and b) A range of town centre mixed uses including employment and retail.</p> <p>The Design Brief prepared for this site should demonstrate how the proposed development:</p> <p>c) Responds to the surrounding Conservation Area; d) Contributes to the town centre vitality; e) Contributes to town centre car parking requirements; and f) Contributes to new and improved cycle and pedestrian links. g) Supports continued high-quality employment use.</p> <p>During the plan period the site may be developed in phases consistent with these objectives.</p> <p>The owners of the site are in full support with future plans for the Town of Henley and are fully cooperative with Henley on Thames Town Council, we can confirm there are no constraints to</p>	<p>Insert wording 'Supports continued high-quality employment use'</p> <p>Add to the supporting text that the site may be developed in phases over the plan period.</p>	<p>The word 'around' would allow this flexibility. Local Plan Policy TC4 requires Henley to provide 1,500 sqm of retail floorspace.</p> <p>Agreed.</p> <p>Add to the supporting text that the site may be developed in phases over the plan period.</p>
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			<p>the site that would prejudice future development on the site. We can confirm the site is suitable, achievable, developable and sustainable. accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”</p> <p>In particular the site currently supports high quality employment, specifically on the Stuart Turner site and our clients are keen to protect and support employment uses on</p>		
6b	M Thomson on behalf of Chilterns Conservation Board	Policy DS7	<p>The Chilterns Conservation Board (CCB) raises objection to the allocation in policy DS7 of site M1 (land north of Highlands Farm) for 110 dwellings on the principal ground that this significantly harms the AONB and, therefore, demonstrably fails to deliver the core duties in law (the Countryside and Rights of Way Act section 85), in national policy (paragraph 176 of the NPPF) and in the Local Plan (ENV 1). We understand the difficult balancing of priorities that confront the neighbourhood plan steering group but conclude that this allocation will not satisfy the basic conditions test, should the matter proceed to the examination stage. We, therefore, urge its deletion. In support of this recommendation, we set out ... our supporting case.</p>		<p>Noted Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the results of each site assessment. Furthermore, the effect on the environment would be moderated by a number of requirements listed in the policy. A Design Brief would be required to incorporate</p>

					<p>and reinforce existing landscaping, green infrastructure and biodiversity features and a Landscape and Visual Impact Assessment would also be required. With regards to the NPPF Paragraph 177, it is demonstrated through the 2020 Housing Needs Assessment that there is considerable need for affordable housing in the Neighbourhood Area, this is considered to constitute an exceptional circumstance and this would be in the public benefit. Local Plan policy H3 states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. The</p>
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					site would also bring forward other public benefit including social benefit through community led housing and the relocation of the Chiltern Centre and economic benefit through 1h of employment land.
		General comment	<p>We also recommend inclusion of our model AONB policy within the Neighbourhood Plan.</p> <p>THE FULL SUBMISSION IS AVAILABLE AT APPENDIX E</p>	<p>Add reference to the Chilterns Building Design Guide in supporting text of Policy SD3 Local Character.</p>	<p>It is considered that the intentions of this proposed policy is already covered adequately by the NPPF (paragraph 176 and 177) and ENV1 of the Local Plan. The guidance is clear that Neighbourhood Plans should not seek to duplicate existing statutory and non-statutory policies. Reference to the Chilterns Building Design Guide can be made in supporting text of Policy SD3 Local Character. However, it is noted that this guide has not been examined and does not form part of the development plan it</p>

					cannot be required to be 'complied' with, though this can be encouraged.
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Additional detail regarding Consultation Response 1b – written comments to online petition

- C. Barr - 10 Jul 2021: I'm truly shocked that in the midst of a global environmental emergency that anyone would consider it a good idea to pour concrete and tarmac on any more green fields. And not just any green field, a school sports field! When we are also facing a global health pandemic, when fitness and health have been shown to be more important than anything, especially for the future generations. What's even worse is the hypocrisy of conducting lessons with pupils teaching them responsibility for the environment and ecology, while the same pupils will be able to look out of their classroom window and see the bulldozers tearing up their school's very own football pitch! There are so many levels why these two green field developments are a very bad idea. Also, why is there this relentless push against local democracy? This relentless pressure for development is the root cause of the current global environmental emergency and there must be a point where we say, no more green destruction. That point is now and the citizens must campaign and insist that it stops.
- K. Moberly - 30 Aug 2021: spending time in these fields as a teenager was a crucial part of my development and appreciation of nature and has made me into the person I am today.
- A. Martin - 5 Jul 2021: The lovely countryside is irreplaceable. And in these dark times is needed for lifting one's spirits. Henley is already a traffic nightmare with polluted air and crowded streets. It's not possible to get a bigger intake of people and the difficulties they cause for local services.
- J. Allan - 21 Jun 2021: Enough is enough. We need more affordable housing for our next generation. Not more luxury housing pretending to be affordable. We also need to preserve the landscape. This is the countryside.
- D. Purton - 19 Jun 2021: this build will most defiantly destroy the tranquillity of Henley. The infrastructure cannot take a new build in this area. The town council should purchase Gillotts sports field and the surrounding coppice area for the good of the community.
- M. McKean - 18 Jun 2021: this green space between Henley and Shiplake is too important to lose.
- L. Tucker - 28 May 2021: we have a climate emergency and a biodiversity crisis. Green spaces absorb carbon, provide diverse and beautiful habitats and landscapes and are vital for people's health and well-being. They are also good for growth and local economy and what makes places like Henley an attractive place to live.
- R. Creed - 21 May 2021: The destruction of Natural Habitat is the exact cause of the crisis the world now finds itself in. We need to preserve Nature not destroy Her!
- S. Lenton - 10 May 2021: I'm signing because of over burden on local facilities

- D. Inward - 28 Apr 2021: Wildlife areas must be protected. Any development must have the support of the local community.
- Steve W - 27 Apr 2021: We shape our spaces, thereafter they shape us! All of the school grounds + playing fields are sacrosanct - The Georgian grounds & playing fields have; and should continue to, directly shape the children who study + compete at sports within them. Not wishing to be nimby-ist, a small and limited development of solely the Lucy's farm area may be an acceptable compromise. But any idea of development on any of the school grounds is entirely repugnant. It would be totally and completely unacceptable.
- S. Henry - 21 Apr 2021: We must stop this unrelenting process of covering all our remaining green spaces with housing.
- P. Etheridge - 20 Apr 2021: URGENTLY GET TREE PRESERVATION ORDERS ON AS MANY OF TREES ON SITE AS POSSIBLE AND MAKE KNOWN ALL PROTECTED AND RARE SPECIES ON SITE. Be prepared for the developers to get there before any plans are passed and start chopping things down. So the TPOs and ecological surveys are a must as soon as possible. It's disgusting and dishonest to claim it's essential housing or meeting targets but it's happening everywhere and sadly getting the green light. This is happening everywhere..... improper consultations, dodgy dealing with officials, lots of blind eye turning. Usually councils will make a show of objecting but things have a way of turning right at the last in favour of development. Do not be fooled if plans are withdrawn too, this is usually because it is harder to re apply and get permission on a refusal. If plans are tweaked and re submitted a little later they usually get passed. There is a pattern! ITS ALL ABOUT THE MONEY sadly. Best of luck.
- F. Peebles - 19 Apr 2021: Stop the developers profiteering and destroying our previous green spaces.
- P. Johnson - 13 Apr 2021: I feel this is a beautiful boundary to Henley.
- C. Hopkins - 12 Apr 2021: I believe if the government/ council continues to destroy the beauty of the Henley countryside, The town will have no attraction to either residents or visitors. It will become a town of little worth or interest Other than a regatta. It is very short sighted to continue with destruction of land too only replaced with endless characterless houses.
- P. Smith - 12 Apr 2021: Unwanted unnecessary undesirable.
- D. Summers - 10 Apr 2021: Too many new builds close by anyway. It's a beautiful area and needs to be left that way.
- H. Brathwaite - 9 Apr 2021: Do not wish to disturb beautiful countryside.
- H. Orchard - 8 Apr 2021: There are so many empty houses and brown field options to build on. Destroying our essential green spaces is utterly shameful. These spaces are vital habitats for animals, plants, ecosystems. There is no excuse for this and the damage is both irreversible and devastating.
- M. Noble - 3 Apr 2021: I think the pandemic has underlined the importance of green spaces in our community and the cost of losing them cannot be underestimated. The past year has surely taught us that!
- C. Collins - 3 Apr 2021: Because I like to help as much as possible
- A. Washbourn - 1 Apr 2021: The proposed development of Lucy's Farm was rejected in Henley's original Neighbourhood plan 2013 for good reason. Tying it closely to proposed developments at Gillotts Sports Field with the same developer sets a dangerous precedent and should be rejected.

- J. Harrison - 1 Apr 2021: I feel that this development would destroy yet another green area and take away even more of the countryside around Henley. It would cause more pollution and an over-stretching of local services.
- S. Daniells - 31 Mar 2021: NO to this development but Please SOMEHOW more smaller Housing so our Grand-children have more chance of a start on the ladder of Adulthood, otherwise they will be living at home with Mum and Dad for EVER.
- A. Powell - 31 Mar 2021: Same reason as S. Simmons
- B. Kitchen - 30 Mar 2021: We don't try hard enough to utilise brownfield sites. The local authority and national government policies are always at odds with one another. There appears to be no joined up or lateral thinking when it comes to decision making.
- J. Mills - 29 Mar 2021: Every hour of every day more and more green spaces and the wild life they support are trashed in the name of progress. Progress to what I ask? Obviously the death of our planet and everything on it. All Life before profit.
- P. Hughes - 29 Mar 2021: The road infrastructure within the HOT area is already overloaded and reached a chronic level. This development will only exacerbate the frustrating current traffic problem and will further destroy our beautiful countryside. Certainly an additional property development is not required in this area, enough is enough.
- M. Mogridge - 28 Mar 2021: We are reminded of the need to develop more green sports facilities for future generations. This development flies in the face of what should be Government policy.. the assertion that the school playing field is not used is false as our photographic proof will show. Only the developers will benefit from this Philistine proposal.
- E. Taylor - 25 Mar 2021: We need to stop the creep of development on that side of town and preserve our beautiful green spaces.
- A. Jenkins - 24 Mar 2021: We need to save our beautiful green spaces
- G. Larter - 21 Mar 2021: I'm signing because I've lived here for 55 years, my children went to Gillotts and used the facilities and we used to regularly walk the fields as our house backed onto them. There will be no more green spaces around Henley. Gillotts school was held to ransom on funding for the buildings and upkeep in order to "encourage" them to sell the land. It's a BIG NO from me.
- L. Ellery - 13 Mar 2021: This is a ludicrous idea! Next it will be.....an extension to Highlands Farm.....and then overrun and consume the field where everyone walks their dogs (on Greys Road).
- K. Chamberlain - 28 Feb 2021: It will bring detriment to the area.
- L. Chamberlain - 28 Feb 2021: We owe it to the next generation
- S. Murton - 22 Feb 2021: As a relatively recent ex-Gillotts pupil, I can't see how this is up for debate. The sports fields are key to the school and to the environment. I understand the School needs some development but surely this is going in the wrong direction? The development will not only affect the school and children but will harm the wildlife and increase pollution in the town, which we're so desperately trying to reduce. We must start preserving and developing our green areas, not creating luxury and most likely secondary homes for the affluent.
- J. Oliver - 20 Feb 2021: With the ecological state of our planet, we should be conserving all the green spaces we can, not building on them. Honestly, if each person owned just one house as their home instead of buying for "investment" / "retirement fund" etc etc there

would be enough housing. When will enough be enough?? However, capitalism is encouraged by Government who in the past have bailed out banks and penalised the common person!!! Stop the developers and stop individuals owning more than 1 abode and there would be enough housing!!!! The only people who will buy up these new houses will be the rich and people wanting a second home to rent at huge rates per month and then another plot of green land will be threatened to build on!!! If you own more than one house and are against this development then you are partly to blame for the housing crisis and the need to build on these precious, beautiful green spaces!!!

- Peter M. - 20 Feb 2021: 1. Ridiculous in a supposedly affluent town like Henley that the one secondary school is selling its playing fields to raise money. HeadM, Governors!!! 2. A proposal that in essence destroys an AONB and in the process a little bit of Henley when there are so many obvious brownfield sites available nationwide beggars belief. Town Council?
- L. Lepp - 18 Feb 2021: A beautiful landscape should be preserved for the animals and the beauty.
- N. Mercer - 16 Feb 2021: We really need low cost housing for people on lower incomes to keep the diversity of the area.
- J. Lake - 15 Feb 2021: I'm not against more houses, they just need to be in the right place. Along the ridgeline of the Harpsden Valley, risking floods in that village, does not seem to be the right place. I'm not even convinced that the increased traffic on Blandy Rd would be a dramatic problem - and I live in Blandy Rd. I'm not sure that a State School should be able to sell off land for its own benefit - surely the money raised should go into the wider education budget, benefiting areas that need the cash?
- H. Webb - 15 Feb 2021: Needed is more affordable housing, rather than houses for the better-off
- A. Griffith - 15 Feb 2021: This proposed development is right on the edge of an AONB. It also uses school playing fields, which are Gillotts school's main asset for the future. This development will harm areas of wildlife, beauty, education, hugely increase traffic and put further strain on already 'at capacity' local services, roads and schools. There will be very little affordable/rental property included for future generations to be able to continue to live in their own home town will only benefit the developer's profits and bulging pockets. No brainer - NO!
- D. Murray - 15 Feb 2021: Having lived on Blandy Road for the past 20 years my biggest complaint about this proposed development is that Blandy Road will be the single point of access. Building circa 150 new homes on these 2 sites will result in circa 300 additional vehicles all accessing the new estate via Blandy Road. This will turn this very quiet residential road into a much busier and, potentially, much more dangerous thoroughfare. There appears to be no thoughts or plans to access the site via Rotherfield Road or Harpsden. Additionally, we do not need these two beautiful green spaces to be turned into another housing development.
- D. Collett - 13 Feb 2021: We don't need more completely unaffordable housing that the locals can't afford to buy whilst at the same time taking away the countryside that at least the locals can use!
- K. Grant - 13 Feb 2021: I believe there are more suitable sites that will have far less impact on the countryside and children of Henley. This isn't a decision that only will only affect today's generations but those of years to come.

- J. Hartley - 12 Feb 2021: I'm signing because I grew up in Henley and visit often. Protecting our rural heritage is essential to wellbeing - surely we have learnt that over the last year.
- G. Belcher - 12 Feb 2021: I used to live in Henley and it would be a shame if the proposal goes through
- D. Deeming - 12 Feb 2021: ALL green spaces should be preserved.
- K. Bryan - 12 Feb 2021: Time and time again, this is happening everywhere, people need to understand we need to conserve our green spaces
- C. Ritchie - 12 Feb 2021: Henley needs to preserve such green spaces & the road infrastructure cannot support additional housing.
- L. Folland - 12 Feb 2021: I lived round the corner from there in the 1970s, and have fond memories of that lovely place where my daughters went to school. Our green spaces are precious, and must be preserved for future generations.
- N. Wrigley - 11 Feb 2021: Too much development in the area for the infrastructure.
- A. Mortimer - 11 Feb 2021: Lived in Henley all my life, this would be a blight on this beautiful landscape
- A. Salter - 11 Feb 2021: I grew up in Harpsden and went to the village school and Gillotts. We need to stop developing green countryside spaces for profit.
- B. Anderson - 11 Feb 2021: I grew up in Henley and I don't believe that Henley needs any more development like this.
- D. Inward - 11 Feb 2021: Green spaces must be protected. Any development must have the support of the local community.
- A. Johnson - 11 Feb 2021: These sites were rejected by Henley people in the Neighbourhood plans.
- C. Kenning - 11 Feb 2021: Shocking to even contemplate building on these hallowed green fields.
- N. Kirkham - 11 Feb 2021: Enough is enough, develop and refurbish existing infrastructure before building on greenfield. It shouldn't even be up for debate.
- S. Simmons - 11 Feb 2021: Building on this site would be a blight on the landscape and will dominate the valley. How is this even up for debate????
- D. Smith - 10 Feb 2021: SOME CORPORATE INTERESTS ARE ALWAYS OPEN TO NEGLECTFUL CONSIDERATION OF GREEN SPACES WHICH ENRICH HUMAN EXISTENCE MUCH MORE THAN CEMENT , BRICK AND WOODEN CONSTRUCTION. FEEDING THE SOUL IS IMPORTANT TO RESIDENTS AND TO THE SOULS OF FUTURE GENERATIONS. PLEASE DON 'T BE SELFISH. BE GENEROUS OF SPIRIT AND CONSIDER THE MANY OTHER POSSIBLE BUILDING SITES.
- S. Wrath - 9 Feb 2021: With all the businesses that have closed to the pandemic there are plenty of brown field sites that could be redeveloped

Joint Henley and Harpsden Neighbourhood Plan

Regulation 14 Consultation – Comments received from agents and third party representations

Respondent ID	Name	NP section/ policy/ page being commented on	Summary of response	Change to Plan.	Comments
1c	M Lambert, PPML Consulting Ltd on behalf of B&M Care	Policy DS8	<p>1. B&M Care objects to the draft allocation use of Site X for 23 new homes.</p> <p>The Aecom Site Assessment June 2021 states that a C2 use on Site X can be supported in policy terms provided sufficient evidence is forthcoming. These representations by B&M Care are supported by a Planning Needs Assessment prepared by Carterwood, dated October 2021, which robustly demonstrates that C2 use care home spaces will be required in Henley by 2027.</p> <p>2. The Executive Summary T4 Conclusions and Recommendations of</p>		This site was assessed by consultants AECOM who concluded that if there is evidence a care home is needed in this location this would be sufficient evidence to support an allocation. If the evidence of need does not exist, the site cannot be allocated in the Plan for the C2 use, but could be included in the NDP as an aspiration which aims to bring forward the site as a care home, should the evidence of need come forward. If the site was allocated it would count towards the housing requirement, but the exact

			<p>the Carterwood Planning Needs Assessment October 2021 demonstrating need for a care home in Henley by 2027 are as follows:</p> <p>B&M Care propose to build and operate a purpose built 56-bed care home to meet the needs of all aspects of elderly care, more specifically dedicated dementia care and nursing. All of the bedrooms within the proposed care home will have wetroom en-suites, including a level-access shower;</p> <p>Taking into account the planning, preparation, construction and commissioning timelines it is anticipated that the proposed care home would be fully operational in 2027;</p> <p>The needs analysis has considered two catchments (i) the 'Market' catchment and (ii) the 'Local Authority' catchment. The Market catchment is based on a 4 mile radius and is considered to reflect the actual catchment area, excluding the</p>		<p>calculation should be discussed with SODC. OCC have confirmed that the Market Position Statement 2019 - 2022 does not specify a need for more care homes and therefore this site is being proposed to be rolled forward from the existing Plan for 23 dwellings.</p>
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			<p>outskirts of Reading to the south east. The Local Authority area has been assessed as the site falls within the South Oxfordshire District Council;</p> <p>Taking into consideration the proposed scheme, the market need should be assessed against elderly care with wetroom en-suites and / or dedicated dementia care;</p> <p>It should be noted that, in light of the Covid-19 pandemic, there is likely to be an increased need for bedrooms with wetroom en-suites in the future as the importance of bathing and delivering personal care within a residents room has become an essential component of infection control;</p> <p>Taking into consideration the above, this Needs Assessment demonstrates a need in 2027 for bedrooms with wetroom en-suites in both the Market Catchment (122 beds) and the Local Authority catchment (169 beds). With regard to dedicated dementia, this Needs Assessments demonstrates a</p>		
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			<p>need for 83 beds in the Market catchment and 159 beds in the Local Authority catchment; and</p> <p>The need to provide specialist elderly care, particularly dedicated dementia and nursing, is further supported by the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 and the Oxfordshire Market Position Statement 2019- 2022;</p> <p>To conclude, this Need Assessment provides robust evidence that a care home is required in Henley by 2027 and therefore satisfies the AECOM draft Neighbourhood Plan requirement to support a C2 use allocation on this site</p> <p>3. B&M Care wish to build a C2 use care home on this site and have no intention of delivering 23 new homes within the new neighbourhood plan period.</p> <p>The Neighbourhood Plan Group have previously asked the landowner on a number of occasions during this review</p>		
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			<p>process whether C3 housing will be delivered on Site X. B&M care have consistently made it clear that they won't be delivering 23 x C3 homes on this site. They have owned the site since 2016 and have always been upfront about their intentions to build a care home on this site. There is simply no point in re-allocating Site X for 23 new homes in the Neighbourhood Plan review as they won't be delivered. The current neighbourhood plan allocation has not delivered 23 new homes on Site X in the last five years and the proposal to ignore the aspirations of the landowner and simply 'roll it forward into the new plan' will not ensure its delivery.</p> <p>4. Care Home bed spaces will be counted towards the council's housing delivery</p> <p>The Aecom site assessment for Site X stated the following: "If the site was allocated (C2 use) it would count towards the housing requirement, butthe</p>		
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		<p>exact calculation should be discussed with SODC.”</p> <p>SODC Housing Land Supply Statement June 2021. The PPG states that LPA's will need to count older peoples including C2 uses against their housing requirement:</p> <p><i>Residential Institutions</i></p> <p><i>4.11 - The PPG states that local planning authorities will need to count housing provided for older people including residential institutions in use class C2 against their housing requirement, based on the amount of accommodation released in the housing market.</i></p> <p><i>4.12 - For residential institutions, the calculation is based on the average number of adults living in a household, using the published 2011 Census data (as shown in Appendix D). For South Oxfordshire the average number of adults living in a household is 1.9 (rounded to 1 decimal place).</i></p> <p><i>4.13 - The Housing Delivery Test uses the national average for the number of adults living in</i></p>		
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			<p><i>households, which may cause a slight difference in completion figures if compared.</i></p> <p>So applying a ratio of 1.9 to the proposed 56 bed care home on Site X is equivalent to 29 dwellings that would be counted towards housing delivery which exceeds the current 27 dwelling allocation.</p> <p>I trust that these representations on the draft pre-submission Neighbourhood Plan by B&M Care and the robust Planning Needs Assessment prepared by Carterwood, October 2021, demonstrating need for a care home in Henley by 2027 will enable a C2 use care home allocation on Site X, Deansfield Avenue, Henley.</p>		
2c	T Jordan – RPS Group, on behalf of Thames Developments Group Ltd	General comment	We act on behalf of Thames Developments Group Ltd (TDGL) and outline below our comments in relation to the Pre-Submission (Regulation 14) Draft Joint Henley and Harpsden Neighbourhood Plan ('draft JHHNP').		Noted.

			<p>TDGL has a portfolio of commercial and residential properties across the south east of England. It has landholdings within Henley-on-Thames and was fully involved in the consultation processes relating to the currently adopted JHHNP.</p> <p>The land west of Fair Mile (Site A1), which is allocated for residential development within both the adopted and draft JHHNP, is owned by TDGL along with two other parties. TDGL is appointed on behalf of all the owners to promote the land through the JHHNP process. A planning application for the demolition of existing buildings and development of 72 residential units comprising 52 units and 20 flats was submitted for Site A1 in July 2019 (P19/S2350/FUL) and is currently pending consideration by South Oxfordshire District Council (SODC), with a target determination date for later this year.</p> <p>These comments represent TDGL's continued commitment</p>		
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			<p>and ambition to deliver residential development on Site A1 in line with the aspirations of both the adopted and draft JHHNP.</p> <p>Overall, TDGL is supportive of the draft JHHNP and has the following specific comments....</p> <p><i>Summary</i></p> <p>Overall, TDGL is supportive of the draft JHHNP and, subject to the comments [below] agree that it should be submitted to SODC for review.</p>		
		Policy ENV3	<p>Part A of draft Policy ENV3 requires three new trees to be planted for every one tree unavoidably removed as part of the development and Part B requires a minimum of three trees to be planted for each new dwelling. We note the Policy's emphasis on protecting existing trees and enhancement of tree provision which in principle we support. However, the above requirements within both Part A and Part B need to be considered within the context of each individual development and site</p>		<p>Disagree, it is considered that trees are critically important for a number of reasons as evidenced in the Baseline Report.</p>

			constraints; it is not considered realistic or proportionate to include such rigid requirements. It is therefore recommended that Part A and Part B are amended to ensure the maximum number of trees are delivered as part of a development based on site specific characteristics and proposals.		
		Policy SD3	Clarification is sought in relation to the numbering of the view points on the map on page 42; it is noted that some numbers are missing from the map and therefore not aligning with the photographs.	Insert Key View 9.	Noted.
		Policy H1	Whilst we fully support the engagement process proposed with Policy H1, including pre-application consultation with the Town Council, Parish Council and SODC, it should be acknowledged that where an application has already been submitted for an allocated site there may be circumstances to deviate from the exact procedure proposed.		Disagree, it is still important to engage with the Town/Parish and SODC when considering allocated sites as listed in H1.
		Policy H2	We note the policy requirement for at least 25% of all affordable housing units delivered to be as First Homes, in addition to the requirements for affordable	Clarification provided on First Homes in accordance with representations received from SODC.	Agreed.

			<p>housing as set out in SODC Local Plan Policy H9 (i.e. 40% affordable rent; 35% social rent; and 25% as other affordable routes).</p> <p>It is recommended that further clarity is provided on the preferred affordable split and whether the ambition is to deliver 25% First Homes as part of the other affordable routes only, and how this will therefore conform with the requirements within SODC Local Plan Policy H9.</p> <p>Furthermore, since the submission of the application at Site A1 in 2019, discussions have been ongoing with SODC regarding the preferred affordable housing mix. A final agreement was reached in early 2021 and 29 affordable housing units will be provided, with the following tenure split:</p> <ul style="list-style-type: none"> • Affordable Rent – 41% • Social Rent – 35% • Shared Ownership – 24% <p>Whilst we acknowledge the drive for First Homes, as set out in the Ministerial Statement on 24th</p>		
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			<p>May 2021, the delivery of this requirement is not considered realistic for schemes that have been submitted and have been subject to ongoing negotiations with the Council.</p> <p>This is also confirmed within the Ministerial Statement which specially sets out transitional arrangements for applications which have already been submitted and were subject to significant pre-application discussions, such as at Site A1.</p> <p>We would therefore welcome a review of Policy H2 to take into account applications that have been submitted before May 2021 and acknowledgement of the transitional arrangements.</p>		
		Policy T4	<p>We acknowledge the encouragement for developments to provide appropriate electric vehicle charging points (EVCPs) in line with requirements in SODC's Local Plan.</p> <p>We note Part C of Policy T4 requires details of the allocation, location and management of</p>		<p>Noted.</p> <p>Noted, however this has been considered by OCC and SODC and they have</p>

			<p>EVCPs to be submitted with an application.</p> <p>We note that some of these exact details may not be known at submission stage and would therefore recommend that the policy is amended to allow these details to be conditioned or included within a s106, which is considered to be standard practice and would allow the approval of these details at a later date.</p>		not recommended this policy change.
		Policy T6	<p>Part B of Policy T6 requires developments to meet Oxfordshire County Council's (OCC) minimum parking standards.</p> <p>However, OCC's parking standards are set out as maximum spaces. Clarification is therefore recommended in relation to the wording of Part B and how this aligns with OCC's standards.</p>	Remove word minimum.	Agreed.
		Policy DS1	<p>Policy DS1: Proposed Allocations Site A1 Land West of Fair Mail and Policy DS2: Land West of Fair Mile (A1) We are very</p>	Amend the map as per the application site boundary plan submitted with	Agreed.

			<p>supportive of the continued residential allocation at Site A1: Land West of Fair Mile, now incorporating the wider site area with Field Cottage, and the updated figure of 72 dwellings for the site allocation. We note, however, that the site boundary is slightly inaccurate as it relates to the area to the rear of 127 Crisp Road, as per the application site boundary plan submitted with application ref: P19/S2350/FUL.</p>	<p>application ref: P19/S2350/FUL.</p>	
		Policy DS2	<p>We are supportive of the objectives contained within Policy DS2.</p> <p>However, we note that supporting paragraph 11.8 and Part C indicate that a low density for the lower portion of the site in the Conservation Area may be more appropriate. Through the detailed site and views analysis undertaken as part of the submitted development, it has been demonstrated that this is not necessarily the best design solution at the site, which is supported by SODC's design and conservation officers. It is therefore recommended that this specific wording is amended</p>		<p>Disagree, this still allows for some flexibility with the density.</p>

			to allow the layout and density to be defined through the design process.		
3c	Woolf Bond Planning on behalf of T Bingham	Policy DS1 Policy ENV4	<p>My client controls land to the north of 5 Parkside, Henley on Thames, RG9 1TX... .</p> <p>The site was included as an allocation in the PreSubmission Draft Neighbourhood Plan consulted upon in June 2014. It is understood that this proposal attracted 70% support during the public consultation exercise.</p> <p>Despite this it was subsequently omitted from the Submitted and the approved Neighbourhood Plan with alternative sites allocated. Through the consultation on the Draft Neighbourhood Plan, the site has been omitted as a housing allocation and is envisaged as a Local Green Space site (in draft Policy ENV4).</p> <p>For the reasons detailed in this submission, the Local Green Space designation should be removed from the site, and it included as an allocation for residential development.</p>	<p>Make the Local Green Space Methodology available.</p> <p>Refer to dismissed Appeal in LGS assessment: APP/Q3115/W/21/3268954</p>	<p><u>Local Green Space</u></p> <p>Disagree, this site has been put forward for consideration for LGS and is considered to be meet the tests set out in the NPPF (Paragraph 101 and 102) due to having a particular local significance because of its richness of wildlife. This is set out in the Baseline Report. This site is considered to be an existing green infrastructure asset as identified through the South and Vale Green Infrastructure Strategy. Furthermore, the inspector’s report for a recent dismissed appeal, recognises that the site includes mature and semi-mature indigenous trees and is likely to be a significant to the wider ecosystem. Paragraph 174 of the National Planning Policy Framework (the Framework) highlights the benefit of trees and the</p>

			<p style="text-align: center;">THE FULL SUBMISSION IS AVAILABLE AT APPENDIX A</p>		<p>PPG clarifies that a LGS does not need to be in public ownership.</p> <p><u>Site Assessment</u> Comprehensive site assessment has been undertaken on all sites, covering but not limited to environmental impacts. Further details are set out in the Baseline Report. Land North of 5 Parkside The site assessment produced by AECOM concludes that site is not suitable for allocation in the Neighbourhood Plan. Furthermore, as demonstrated through the recent appeal decision APP/Q3115/W/21/3268954 this site is not considered suitable for housing.</p> <p><u>SITE M1 (853a) Land at Highlands Farm</u> The site assessment produced by AECOM concludes that site is suitable for allocation in the Neighbourhood Plan.</p>
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					<p>Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the results of each site assessment produced by AECOM.</p> <p>The impact on environment from Site M1 would be moderated by a number of requirements listed in the policy. A Design Brief would be required to incorporate and reinforce existing landscaping, green infrastructure and biodiversity features and a Landscape and Visual Impact Assessment would also be required. With regards to the NPPF Paragraph 177, it is demonstrated through the 2020 Housing Needs Assessment that there is considerable need for</p>
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					<p>affordable housing in the Neighbourhood Area, this is considered to constitute an exceptional circumstance and this would be in the public benefit. Local Plan policy H3 states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. Site M1 would bring forward the greater number of affordable housing required for the area than this site. The site would also bring forward other public benefit including social benefit through community led housing and the relocation of the Chiltern Centre and economic benefit through 1h of employment land.</p>
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					<p><u>SITE C (Playing Fields at Gillotts School)</u></p> <p>This site is already allocated within the existing JHHNP and therefore the principle of development has already been established. AECOM also assessed the site and considered this to be suitable.</p>
4c	<p>Woolf Bond Planning on behalf of Westbourne Homes and Debrecq (Crossways) Ltd</p>	Policy DS1	<p>On behalf of my client, Westbourne Homes and Debrecq (Crossways) Ltd, I am writing to provide representations on the draft Neighbourhood Plan. My client controls land to the north of Crossways, Reading Road, Shiplake extending to approximately 1.1ha. Through the consultation on the Draft Neighbourhood Plan, the site has been omitted as a housing allocation although it was assessed as consistent with the approach of the development plan for potential housing allocations.</p> <p>However, this should be rectified, and the site included as an allocated site, especially as this will contribute towards</p>		<p><u>Site NEW1 Land North of Crossways</u></p> <p>Comprehensive site assessment has been undertaken on all sites, covering but not limited to environmental impacts and with consideration of the overall strategy of the Local Plan. Further details are set out in the Baseline Report. In terms of the comments stating that sites in this location have been relied upon to achieve the housing requirements of policy HEN1; Thames Farm was granted planning permission as SODC did not have a five year land supply and the Wyevale Garden Centre was on previously</p>

			<p>addressing the deficit that arises once the unjustified allocations in the Plan, particularly that at Highlands Farm (entailing major development on a green field site within the Chilterns AONB) is omitted.</p> <p>THE FULL SUBMISSION IS AVAILABLE AT APPENDIX B</p>	<p>developed land, neither of these sites have been allocated in the Local Plan or existing JHHNP for housing.</p> <p>Furthermore, a planning application (P20/S2103/FUL) for this site has been refused and therefore the principle of development on this site has not been accepted.</p> <p><u>SITE M1 (853a) Land at Highlands Farm</u></p> <p>The site assessment produced by AECOM concludes that site is suitable for allocation in the Neighbourhood Plan.</p> <p>Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the</p>
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					<p>results of each site assessment produced by AECOM.</p> <p>The impact on environment from Site M1 would be moderated by a number of requirements listed in the policy. A Design Brief would be required to incorporate and reinforce existing landscaping, green infrastructure and biodiversity features and a Landscape and Visual Impact Assessment would also be required. With regards to the NPPF Paragraph 177, it is demonstrated through the 2020 Housing Needs Assessment that there is considerable need for affordable housing in the Neighbourhood Area, this is considered to constitute an exceptional circumstance and this would be in the public benefit. Local Plan policy H3 states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local</p>
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					needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. Site M1 would bring forward the greater number of affordable housing required for the area than this site. The site would also bring forward other public benefit including social benefit through community led housing and the relocation of the Chiltern Centre and economic benefit through 1h of employment land.
5c	LRM Planning on behalf of Bloor Homes	Policy DS1	<p>1. These representations to the Joint Henley and Harpsden Neighbourhood Plan published in September 2021 have been prepared on behalf of Bloor Homes.</p> <p>2. Bloor Homes control land referred to as Lucy's Farm, which is immediately east of the existing</p>		Comprehensive site assessment has been undertaken on all sites. Further details are set out in the Baseline Report. The site is not suitable for allocation in the Neighbourhood Plan as it does not meet local policy. The site is adjacent rather than within the built-up area. There are also a number of other

			<p>Neighbourhood Plan allocation at Site C - Gillotts School. We are aware that the consultation document proposed to retain this allocation. Unquestionably, this is an eminently suitable location for new housing development to meet the needs of Henley-upon-Thames. Given the proximity of Lucy's Farm to Site C, those locational characteristics apply equally.</p> <p>3. Successive assessments of this Site's suitability for development have identified the following important considerations: it is not within the AONB or Green Belt, is not within or adjoining a conservation area, is not within an Air Quality Management Area, is not subject to any ecological designations, it does not include any heritage assets, it has a very low proportion of BMV, and is not at risk of flooding.</p> <p>4. As a matter of principle, therefore, given firstly its location and secondly the absence of environmental constraints that would preclude development,</p>		<p>constraints that impact the sites suitability including access and potential risk of coalescence between Henley and Harpsden. A primary objective is to ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other. It is acknowledged that the April 2020 Site Options and Assessment Report by AECOM was undertaken prior to the adoption of the Local Plan, therefore the adopted (Local Plan 2011) was used to determine the suitability of the sites. However, it is considered that there is not a significant difference between Policy H4 (Local Plan 2011) and Policy H1 in the adopted Local Plan. The development would not accord with Policy H1 which states that residential development on sites not allocated in the Development Plan will only be permitted where iii) it is development within the</p>
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			<p>Lucy's Farm represents an entirely appropriate Site for housing development.</p> <p>5. Accordingly, Policy DS1 should include an additional allocation at Lucy's Farm for new housing;</p> <p>this would be in conformity with South Oxfordshire's Local Plan Policy H3.</p> <p>THE FULL SUBMISSION IS AVAILABLE AT APPENDIX C</p>		<p>existing built- up areas of Towns and Larger Villages as defined in the settlement hierarchy (shown in Appendix 7); provided an important open space of public, environmental, historical or ecological value is not lost, nor an important public view harmed.</p> <p>Given the built up nature of Henley it is unlikely that the new housing requirement could be delivered under this policy. Therefore, if the neighbourhood plan wished to allocate sites outside the built up area, it would have to demonstrate these 'specific exceptions/ circumstances' which would make development appropriate on these sites which has not been provided for this site.</p>
6c	Jake Collinge Planning Consultancy on behalf of 'a land/business	Policy DS1	Thank you for the opportunity to submit comments in relation to the draft Neighbourhood Plan. Whilst I am aware that there is the ability to submit		

	<p>owner located in the Neighbourhood Plan Area'</p>		<p>representations via an on-line form, given the focussed nature of the submission below, it was evident that completion of the on-line form would not allow these comments to be submitted in the detail sought.</p> <p>Nevertheless, for the purposes of this submission I can confirm that my contact and address details are those below, and that the submission is made on behalf of a land/business owner located in the Neighbourhood Plan Area.</p> <p>As detailed below, the submission is focussed in two areas:</p> <ul style="list-style-type: none"> • Housing Allocations • Housing Site Assessment ... <p>... there are six allocated housing sites in the made Neighbourhood Plan (accounting for 232 dwellings) that are 'rolled-forward' in to the draft Neighbourhood Plan (and allocated, therein, for 264 dwellings). Fundamentally, and with the exception of Site A that has an outstanding planning application for 72 dwellings</p>		<p>Disagree, Policy DS1 would accord with the NPPG which states that sites identified for years 1-5 are deliverable in line with paragraph 67 of the National Planning Policy Framework. The Neighbourhood Plan identifies housing provision in excess of outstanding requirement set out in the Local Plan Policy H3, sites allocated to meet the outstanding requirement</p>
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			<p>(albeit it is unclear why this remains undetermined two years after submission), these sites are considered to fail the test of deliverability as defined in the [National Planning Policy Framework]...</p> <p>... with the exception of Site A, these sites have been identified and allocated for housing development in the Development Plan for at least the last five years and none have made any progress towards delivering housing. In fact (and again with the exception of Site A) none have even been subject to a planning application for (C3) housing development. They are, clearly, not deliverable when assessed against the definition of such in the Framework.</p> <p>Despite the lack of evidence of deliverability, these sites are 'rolled-forward' as allocations in the draft Neighbourhood Plan. This is contrary to national policy and advice. The draft Neighbourhood Plan</p>		<p>would be deliverable within the first five years.</p>
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			<p>therefore fails one of the Basic Conditions.</p> <p>Accordingly, the draft Neighbourhood Plan should be amended to do either one of the following:</p> <ul style="list-style-type: none"> • Option 1: Delete housing allocations C, E, F, J and X from the Plan and allocate a minimum of 192 homes to alternative, deliverable sites; or • Option 2: Retain housing allocations C, E, F, J and X in the Plan, but in recognition of the serious and well-evidenced doubts regarding their deliverability (and the 'minimum' requirement of Policy H3 of the adopted Local Plan, to allocate additional (deliverable) sites for a minimum of a further 192 homes... <p>Given the fundamental lack of evidence and serious doubts regarding the deliverability of the above noted sites, only by following either of Options 1 or 2 would</p>		
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			the Plan comply with the Basic Conditions....		
		Site Assessment process	<p>Serious concerns are also expressed regarding the robustness and consistency of the various Site Assessment Reports prepared by AECOM.</p> <p>In particular:</p> <ul style="list-style-type: none"> • There is no consistency or clarity between the analysis and assessment of potential housing sites (and the judgments made therein) and the primary housing objectives of the Plan; • The criteria for assessing housing sites is unclear and, from the limited information that is available, lacks robustness or consistency of application; • There is no evident correlation between the findings of the Site Assessment Consultation undertaken in the summer of 2021 and the draft housing allocations (notwithstanding the matters set out below). The Site Assessment Consultation Report indicates that the 		<p>Comprehensive site assessment has been undertaken on all sites. Further details are set out in the Baseline Report. The site is not suitable for allocation in the Neighbourhood Plan as it does not meet local policy. The site is adjacent rather than within the built- up area. It is acknowledged that the April 2020 Site Options and Assessment Report by AECOM was undertaken prior to the adoption of the Local Plan, therefore the adopted (Local Plan 2011) was used to determine the suitability of the sites. However, it is considered that there is not a significant difference between Policy H4 (Local Plan 2011) and Policy H1 in the adopted Local Plan. The development would not accord with Policy H1 which states that residential development on sites not allocated in the</p>

			<p>consultation exercise was intended to 'help guide' the decision on which sites to allocate, but there is no evidence that it had any effect whatsoever. On the contrary, a number of the sites allocated in the draft Neighbourhood Plan performed poorly in the consultation exercise, whereas those better performing sites⁵ are excluded from the draft Neighbourhood Plan – indicating the consultation exercise is/was of little value to the overall process with, it would appear, a lack of detailed scrutiny of the AECOM Report (notwithstanding the expectation that it was professionally prepared);</p> <ul style="list-style-type: none"> • The vast majority of potential housing sites are dismissed as they are deemed contrary to Policy H4 of the (now superseded) former South Oxfordshire Local Plan 2021 - on the basis that they are not considered to be within the built-up area. That approach is unsound. Henley is 		<p>Development Plan will only be permitted where iii) it is development within the existing built- up areas of Towns and Larger Villages as defined in the settlement hierarchy (shown in Appendix 7); provided an important open space of public, environmental, historical or ecological value is not lost, nor an important public view harmed.</p> <p>Given the built up nature of Henley it is unlikely that the new housing requirement could be delivered under this policy. Therefore, if the neighbourhood plan wished to allocate sites outside the built up area, it would have to demonstrate these 'specific exceptions/ circumstances' which would make development appropriate on this sites which has not been provided.</p>
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			<p>well-recognised for being constrained and that to deliver appropriate and proportionate growth</p> <p>consistent with the Market Town status, it is likely that outward expansion of the town (beyond its current built-up limits) would be required. That was the case with the (delivered) housing sites in the made Neighbourhood Plan, and there is no expectation or limitation that the draft Plan should not, and cannot, do likewise;</p> <ul style="list-style-type: none"> • Notwithstanding the above, the single additional (significant) housing allocation in the draft Neighbourhood Plan – Site M1 – is justified in the AECOM Report on the basis that ‘the site (once the wider site construction is complete) is within the built-up area’ and ‘The site’s suitability would remain the same should the emerging plan become adopted policy, as it is in conformity with Policy H1 as the site is appropriate infilling within the existing built-up area’. That justification does not stand up to any level of professional scrutiny. The site is simply not 		<p><u>SITE M1 (853a) Land at Highlands Farm</u></p> <p>The site assessment produced by AECOM concludes that site is suitable for allocation in the Neighbourhood Plan.</p> <p>Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the results of each site assessment produced by AECOM.</p> <p>The impact on environment from Site M1 would be moderated by a number of requirements listed in the</p>
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			<p>within the built-up area of Henley-on-Thames and to suggest it is fundamentally undermines the credibility of the whole Site Assessment Report;</p> <ul style="list-style-type: none"> • The implications are, nevertheless, significant since it is that judgment that is used to set site M1 apart from other submitted potential housing sites on the edge of the built-up area. That leads to inconsistent and inappropriately justified decision-making. If correctly assessed as a potential housing allocation on the edge of, but outside, the built-up area, then to ensure consistency a comparative assessment ought to be made against those other edge-of settlement sites that have been submitted. That is, if there is consistency of decision-making, those other sites on the edge of the settlement, and no less well related to the built-up edge than site M1, should not have been dismissed for this reason, but equally assessed against relevant criteria; 		<p>policy. A Design Brief would be required to incorporate and reinforce existing landscaping, green infrastructure and biodiversity features and a Landscape and Visual Impact Assessment would also be required. With regards to the NPPF Paragraph 177, it is demonstrated through the 2020 Housing Needs Assessment that there is considerable need for affordable housing in the Neighbourhood Area, this is considered to constitute an exceptional circumstance and this would be in the public benefit. Local Plan policy H3 states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. Site M1</p>
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			<p>Conversely, if site M1 is held to be within the built-up area or represents appropriate infilling – as AECOM allege – then there are other submitted sites no less well-related to the built-up area and no less constituting infill that should not have been dismissed in the AECOM report for this reason (for example, Site 1158 (Swiss Farm International, Marlow Road) that, by any reasonable comparison with Site M1, would be more appropriately judged as being within the built-up area); and</p> <ul style="list-style-type: none"> • The Site Assessment undertaken by AECOM was the principal focus of the Summer 2021 consultation in respect of the proposed housing allocations in the draft Neighbourhood Plan. Accordingly, the errors and inconsistencies in that assessment would not only have reduced the validity of any findings arising from that consultation exercise, it would have unacceptably skewed the results 		<p>would bring forward the greater number of affordable housing required for the area than this site. The site would also bring forward other public benefit including social benefit through community led housing and the relocation of the Chiltern Centre and economic benefit through 1h of employment land.</p>
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			<p>The implications of the above factors, which lead to an allocation (Site M1) that is not positively justified or well-reasoned, are significant. Site M1 is located in the Chilterns Area of Outstanding Natural Beauty (AONB) an area that should, as per the Framework, be afforded great weight for the conservation and enhancement of its nationally important and recognised landscape and scenic beauty. Accordingly, by erroneously dismissing other sites (that may be outside the AONB or in less sensitive parts of the AONB) the approach obviates what should be an appropriate comparative assessment of the landscape impact of potential sites. Whilst it is recognised that landscape impacts alone are not the decisive/determining factor in allocating sites, it is an important and critical part of the exercise, and by wrongly justifying Site M1 as being within the built-up area or representing appropriate infill (and thereby dismissing other sites with similar characteristics), AECOM have 'side-stepped' an</p>		
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			<p>essential part of the analytical process. That is a fundamental and unjustified failing that undermines the soundness of the plan.</p> <p>For these reasons, therefore, the draft Neighbourhood Plan is considered to be unsound, with the failings only capable of being addressed through Options 1 and 2 noted above (relating to housing allocations) and a fundamental review, from first principles, of the submitted housing sites against clearly defined and reasoned objectives and applying consistent planning judgements throughout.</p> <p>THE FULL SUBMISSION IS AVAILABLE AT APPENDIX D</p>		
7c	P Warren, Savills, on behalf of Crest Nicholson	Policy DS7	Crest is promoting the Northern Field at Highlands Farm (Site M1) which is included in the pre-submission neighbourhood plan as an allocation to deliver circa 110 residential units, one hectare (ha) of employment land, open space, the relocation of the Chiltern Centre and provision of community-led housing (Policy DS7).		Noted.

			<p>Crest is writing in support of the emerging Neighbourhood Plan and the allocation of Site M1 for a residential led mixed-use development under Policy DS7. Site M1 is available, deliverable and developable and can commence within the first five years of the Neighbourhood Plan...</p> <p>THE FULL SUBMISSION IS AVAILABLE AT APPENDIX F</p>		
8c	A Murrell, Savills, on behalf of Mr Wason	Policy ENV4	<p>Objection to Proposed Local Green Space Nominations at Corner of Harpsden Road and Sheepcote Lane and Harpsden Court.</p> <p>Reasons for objection to the nomination</p> <p>1. The proposed LGS designations on both of the sites do not meet the requirements of paragraph 102 of the NPPF in full.</p> <p>Paragraph 102 confirms that LGS designations should be “where</p>		

			<p>the green space is demonstrably special to a local community and holds a particular local significance, recreational value (including as a playing field), tranquillity or richness of its wildlife". Each of the two sites are assessed in turn below with regards to the criteria set out in paragraph 102.</p> <p><i>Corner of Harpsden Road and Sheepcote Lane</i></p> <p>a) This site is not accessible to the general public, being within private use and fenced off. On this basis, it cannot be said that the site is 'demonstrably special' to the local community.</p> <p>b) 'Particular local significance' – as explained above, the site is in private use so cannot be considered in local use, or locally significant, on this basis.</p> <p>c) 'Recreational value' – the site is not in recreational use by the general public. The baseline report (2020-2035) for the draft neighbourhood plan identifies that the site does not hold recreational value to the community.</p>		<p>Disagree, Public access is not pre-requisite for a Local Green Space designation. The PPG states that other land could be considered for designation even if there is no public access.</p> <p>This site has been put forward for consideration for LGS and is considered to be meet the tests set out in the NPPF (Paragraph 101 and 102) due to having a particular local significance because of its richness of wildlife. This is set out in the Baseline Report. Furthermore, it is in a prominent location approaching Harpsden from the East.</p>
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			<p>d) 'Tranquillity' – it cannot be said that this area of land, privately owned and adjoining Harpsden Way to the east and south provides for a sense of 'tranquillity'. This is further evidenced in the baseline report which identifies that the site is not proposed for a LGS designation based upon its sense of tranquillity.</p> <p>e) 'Richness of wildlife' – ecologically important areas are afforded statutory designations set out in a tier system from internationally or European protected sites, national protected sites, locally protected sites to protected areas. None of these statutory designations are afforded to the site. Whilst the site is recognised as a priority habitat in the baseline report on account of the site comprising a deciduous woodland, there is no evidence to suggest that it is 'rich in wildlife'.</p> <p>f) 'Demonstrably special' – the site is not in public use and is fenced off. It is therefore apparent that the site does not serve a community and for this reason, it cannot be said to be 'demonstrably special' to a local</p>		
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			<p>community. The inclusion of the site as a proposed LGS is therefore completely anomalous.</p> <p><i>Harpsden Court</i></p> <p>a) This site is not used by the general public as it is privately owned. The baseline report references this and therefore it cannot be concluded that the site is 'demonstrably special' to the local community. Furthermore the baseline report incorrectly states that there are no statutory designations on this site however, it lies within the Chilterns AONB.</p> <p>b) 'Particular local significance' – as aforementioned the site is in private ownership and can therefore not be considered in local use or locally significant as a result.</p> <p>c) 'Recreational value' – as identified in the baseline report the site does not have recreational value on account of it not being in recreational use by the general public.</p>	<p>Remove as Local Green Space.</p>	<p>Agree.</p>
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			<p>d) 'Tranquillity' – the site is used privately, adjoins Harpsden Way and there are residential properties to the east hence, it cannot be considered that this site provides a sense of tranquillity. This is also further evidenced in the baseline report which does not consider the site to offer a sense of tranquillity.</p> <p>e) 'Richness of wildlife' – as mentioned above ecologically important areas are afforded statutory designations set out in a tier system from internationally or European protected sites, national protected sites, locally protected sites to protected areas. None of these statutory designations are afforded to the site. Whilst this site is also recognised as a priority habitat in the baseline report on account of the site comprising a deciduous woodland, there is again no evidence to suggest that it is 'rich in wildlife'.</p> <p>f) 'Demonstrably special' – the site is not in public use, and therefore it does not serve the local</p>		
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			<p>community. As such it cannot be considered that the site is 'demonstrably special' to the local community and hence the proposed LGS designation is inconsistent with national policy as set out above.</p> <p>The legislation for designating LGS's as set out in paragraph 102 of the NPPF requires all of the criteria to be satisfied. In particular, it needs to be demonstrated that any sites nominated are special to the local community. In the baseline report for the Joint Henley and Harpsden Neighbourhood Plan it references that neither of the sites (21 and 35) are special to the local community with regards to their historic, recreational or tranquil values. The report considers that both sites are special to the local community solely based on their ecological value. However, neither site is statutorily designated for ecological reasons and it has not been demonstrated that there is a richness of wildlife on the site</p>		
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			<p>that affords a LGS designation. Whilst it is recognised that the sites comprise priority habitats this in itself does not evidence that there is an abundance of wildlife which warrants a LGS designation. Therefore, the nominations of sites 21 and 35 do not meet the legislative tests as set out in paragraph 102 of the NPPF.</p> <p>If the Neighbourhood Plan proceeds and does not meet the necessary legislative and policy tests, it will be open for a legal challenge and will not be successful at examination.</p> <p>My client therefore STRONGLY OBJECTS to the nomination and I would strongly recommend that the proposed LGS designations on these sites are not taken forward.</p> <p>THE FULL SUBMISSION IS AVAILABLE AT APPENDIX G</p>		
9c	A Divall, on behalf of blocwork	General comments	These comments are submitted on behalf of my client blocwork who are developing proposals for new hotel on the Henley Railway Station Car Park.		

			<p>My client supports the intention of the Town Council to develop an updated Neighbourhood Plan for the Henley and Harpsden Area.</p> <p>My client makes the following comments.</p> <p>Paragraph 3.26 of the plan is supported. This states: 'Parking in the town centre is an issue with Greys Road and Kings Road car parks often full. Edge of centre car parks such as the station car park and rugby club car park tend to be underutilised'.</p> <p>Detailed studies and car parking surveys submitted in support of the planning application (P21/S2618/FUL) show that the Station Car Park is indeed underutilised and has the capacity for redevelopment.</p> <p>The South Oxfordshire Local Plan 2035 was adopted on the 10 December 2020. The Henley Neighbourhood Plan must be prepared in accordance with the adopted Development Plan for</p>		<p>Noted.</p> <p>It has been demonstrated in the Baseline Report that there has been a number of new hotel and bedspaces provided that have not been taken into account in the 2014 South Oxfordshire and Vale of White Horse Hotel Needs</p>
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			<p>South Oxfordshire which includes the Local Plan 2035.</p> <p>The adopted Local Plan sets out the framework for which planning applications will be considered against and provides a strategy for the growth of the South Oxfordshire economy. To support the economy, the Local Plan encourages new development to advance the visitor accommodation for leisure and business purposes. This includes the provision of new hotel accommodation within the built up area of towns, such as and including Henley on Thames.</p> <p>The Local Plan is explicit at paragraph 5.36 that: 'A joint Hotel Needs Assessment has been prepared with Vale of White Horse District Council. The assessment confirms the need for a significant increase in hotel supply in the Science Vale area, and further hotels in Thame, Henley-on-Thames and Wallingford.'</p> <p>The Local Plan is therefore clear that there needs to be support</p>		<p>Assessment. Furthermore, the newly adopted Local Plan EMP11: Tourism sets out a supportive approach to hotels and there is no requirement for the Henley and Harpsden Neighbourhood Plan for such a policy, meaning that the policy is no longer required.</p>
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			<p>for the development of 'significant' new hotel accommodation within the District and that includes Henley on Thames. The Development Plan, including the Henley and Harpsden NP, must recognise this and set out appropriate and positively worded policies to support the development of additional hotel accommodation within the town.</p> <p>The Pre-Submission Regulation 14 Draft Plan includes no reference to the support for additional hotel accommodation within the town and this needs to be addressed within the Plan.</p> <p>The adopted Neighbourhood Plan (2012-2027) does recognise this and one of its primary objectives (RO4) is to 'build up the hotel and bed capacity in Henley'. This support for further hotel accommodation in the town is delivered through policy TCE3 of the adopted Neighbourhood Plan.</p> <p>My client considers that the Regulation 14 Draft Neighbourhood Plan takes a step</p>		
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			<p>backwards with regards to the support for the delivery of new hotel accommodation within the town from the adopted Neighbourhood Plan.</p> <p>For these reasons, as currently drafted, the Regulation 14 Plan is not considered to be sound in terms of its consistency with the adopted South Oxfordshire Local Plan.</p> <p>We would be happy to discuss these comments further with the Town Council.</p>		
10c	Neal Thomas, on behalf of Aspect Finance	Policy DS1/ Site Assessment process	<p><i>Aecom [site assessment] Report:</i> Aecom didn't mention things like how Henley is expanding South towards Shiplake joining it up. Henley is being expanded West into ANOB with Highlands Farm with no local amenities.</p> <p>This makes Henley a very off centre Town. Borlase Field, 1158 [Swiss Farm International] is the most local feasible site to the town centre. This means it has schools, amenities, shops and transport already present with the Town Centre. We think Aecom missed essential considerations like this.</p>		<p>Comprehensive site assessment has been undertaken on all sites.</p> <p>In order to determine the most suitable sites for allocation the sites considered green or amber and site 1158 and site 6 (due to proposing additional affordable housing) were subject to additional site assessment criteria and considered against the Strategy for the Local Plan and Neighbourhood Plan Objectives. Further details</p>

			<p>Councillors and residents did raise these facts a few times throughout the process, but it doesn't seem to have been considered.</p> <p><i>Open Day, Town Hall:</i> The open days seemed to show that local residents recognised the benefits with very low impact ratings for Borlase Field and very positive comments for its merits. The lack of expansion to the North of Henley was commented many times stating the town needs rebalancing.</p> <p>Aecom didn't seem to validate any of Borlase Fields comments though and still states that it not being policy compliant when this whole procedure is to amend the Local Plan for the Towns benefit for years to come with the Call for Sites. – very long sentence, I can't really understand it as it's so long with no punctuation!</p> <p><i>Comments on the open day:</i> These were extremely positive for Borlase Field especially compared with other sites. As a direct comparison to Highlands</p>		<p>are set out in the Baseline Report.</p> <p>This site is not suitable for allocation in the Neighbourhood Plan as it does not meet local policy and was rated red in the assessment. The site is adjacent rather than within the built- up area. Further details are set out in the Baseline Report.</p> <p>See response to J Collinge.</p>
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			<p>we came in lower (therefore less impact) in each of the 6 considerations.</p> <p>We had less impact for all 6 parts against other considered sites also: Land west of Fairmile, Gillotts playing fields; Land at reading road.</p> <p>Stuart Turner never presented so no assessment to compare.</p> <p>Mistakes should have been spotted and similar sites or site benefits or detriments should have been highlighted and compared across each site consistently to give appropriate merit. To compare Swiss Farm to Highland on the open day we had this put on our stand by the town council:</p> <p>Planning Policy Consideration The site is not in conformity with South Oxfordshire Local Plan</p> <p>Conclusion The site is not suitable for allocation in the Neighbourhood Plans it does not meet local policy.</p>		
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			<p>Highlands is a similar site in AONB outside the normal Henley building line and did not have that same statement. We can't see why it's seen as different to Swiss Farm.</p> <p>Nowhere was it explained to the public properly what a 'Call for Sites' means which is why Swiss Farm was being considered.</p> <p>The report that Jake [<i>Collinge – see response 6c</i>] is providing does show that the Aecom report wasn't discussed and scrutinised fully in any town meeting to identify errors or issues or raise further thoughts. This is an important document that needs solid scrutiny. When the local plan goes forward it needs to be considered to be fair in line with Jake's assessment.</p> <p>It was said to be a third party document so therefore considered correct without question however mistakes always happen and things evolve throughout a process. Resident's thoughts need to be considered and reports tested against them.</p>		
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			<p>This seems to be an oversight that needs looking at.</p> <p>One of the original Aecom reports commented that Borlase Fields should be considered if it offered more than the standard social housing ratio. We have shown on the zoom presentations and the Town Hall presentations that there was an extra 0.5 acres that we were happy for the councillors to promote what they wish for this. That would mean the site would produce more than compliant social housing ratio. It was still being considered by us to look at the land trust or super social housing. However, Aecom missed this.</p>		
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Joint Henley and Harpsden Neighbourhood Plan

Regulation 14 Consultation – Comments received from individuals and our response

Respondent ID	Name	NP section/ policy/ page being commented on	Summary of response	Change to Plan	Comments
1	A Van Leemputten	General comment	<p>1.No discussion of the increased demand on nursery/primary places nor the distances people will have to travel to get children to school.</p> <p>2.No discussion about the new ways of working and that people will require home offices.</p> <p>3.Increase in the number of homes on a site indicates that the homes' square footage will be smaller. Britain already has the smallest sq footage of living space of the average family, of any other European country.</p> <p>4.No discussion of safe cycling routes.</p> <p>5.How has the need for HGV's to deliver to Tesco's been addressed?</p>		<p>1.There has been confirmation that there is space in majority of primary schools. AECOM considered the distance to travel to school as part of the site assessment. CIL collected from new development would contribute towards education.</p> <p>2.Noticed.</p> <p>3.Noticed, no action.</p> <p>4.Cycling routes are considered as part of Policy T2: Active Travel.</p> <p>5.Noticed, Tesco's ambient deliveries travel over Henley bridge, the Neighbourhood Plan supports an environmental weight limit on Henley Bridge.</p> <p>6.No comment, this is not a comment relating to a policy or proposed site in the Plan.</p> <p>7.Policy ENV4 proposes Local green spaces of particular importance and Local Plan policy CF5 requires that all new residential development provide or contribute towards open space. Noticed, see transport policies.</p>

			<p>6.How many flats are being occupied in the newly built retirement homes?</p> <p>7.No new parks/green spaces designated. Truly dismayed as a cyclist that there is no discussion of the need to make out of town parking more attractive to car users.</p>		
2	D. Sadler	Policy DS3	Strongly supportive of the allocation of 50 houses to the Gillotts School Site.... substantial capital sum for the school would represent an important investment in the young people of the town.		Noted.
3	R Phillips	General comment	Not much new thinking about traffic issues. Greys Road [traffic] will only get worse with all the proposed developments on or adjacent to it.		Oxfordshire County Council (OCC) as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
4	S Shipley	Policy DS3	Strongly object to development of the Gillotts School site. This will open the possibility for further infill development and impact on the views from the AONB.		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was

					deemed suitable for residential development by independent professional consultants AECOM.
5	T Trimmings	Policy DS3	Object to the plan to build houses on Gillotts school fields.		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.
6	A Pewsey	Policy DS3	Object to the plan to build houses on Gillotts school fields. Area would be blighted.		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.
7	AG Taylor	General comment	1.The Key View 3 photograph looks south and not north 2.No account taken of plans to a) introduce turbines for electricity generation in the two weirs at	Change the wording to 'looking south'.	1.Noticed, change 2.Noticed. 3.Noticed, support.

			Marsh lock... b) build a wind turbine on... Drawback Hill 3.Site/s facing south should be sought for the installation of a solar energy farm		
8	I Pearson	General comment	<p>1.Do not over develop and over densify the town as the local road, schools and various services will not receive a comparable level of upgrade</p> <p>2.Require all the developers and developments to be built using tradition wood, brick and flint stone and mandate that the developments must blend effortlessly into the historic look and feel of the town.</p> <p>3.Purchase and redevelop the land currently occupied by Upton Close and the Jewson builders yard. Utilization of the land space itself is extremely poor. If you were to compulsory purchase all the Upton Close properties hypothetically at an agreed % above market value and with the agreement to offer current owners first refusal on the new build properties, demolish everything and combine with the Jewson builders yard land you would gain a huge amount of developable space ... would reduce the pressure on the need to develop on untouched areas [and]</p>		<p>1.Noted.</p> <p>2.See policy SC3 and at Conservation area appraisal where this is considered.</p> <p>3.Town council does not have compulsory purchase powers.</p>

			ensure no green field site was used.		
9	J Clark	General comment	Support the plan, aims, policies and proposals		Noted.
10	GW Hilder	Policy DS4	Henley town centre is currently struggling to attract retail business... 'Bricks and mortar' retailing is in decline. Site should be prioritised for car parking and / or local housing and small business units. No need for more retail.		Noted. Requirement of the Local Plan (Policy TC1) for single storey food store.
11	C Bond	Policy DS3 Appendix B	<p>Believe that the total dwellings covered by proposed and approved sites exceeds the number required... if any sites are to be removed from the plan, I would like this site to be one of them.</p> <p>The position of the site would be detrimental to that area of Henley with a loss of green space and wildlife sites, disruption of a quiet footpath and increased traffic on minor, residential roads. Do not see why the comment against "Climate emergency" for this site is simply 'n/a'. It is applicable. This is an undeveloped, green area. There is bound to be a loss of tree cover, and probably</p>		<p>Yes, there is a requirement to go above the housing requirement in Policy H3 of the Local Plan. Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d</p> <p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p>

		General comment	also increased water run-off and traffic. Concerned about how the traffic in Henley will fare given all these developments.		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
12	M Tebbott	Policy DS7 and Policy DS9	[Site M1 and Site Y] ... are inter linked. Relocation of the Chiltern Centre to Highlands Farm would enable the provision of an up-to-date, purpose-built specialist day and residential care facility for young people. Redevelopment of the existing Chiltern Centre site for housing would be a sustainable use of the land.		Noted.
13	K and H Gailey	p. 83	New site - North field at Highlands Farm	Add "new"	Noted.
14	R Searby	Policy DS1	support all the sites allocated except Gillotts School (site C). The plan does not indicate how the site will be accessed and its location is likely to affect the landscape. I strongly support the higher quantities of new homes proposed than those in the current plan.		The access to the site will be confirmed at a planning application stage. Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.

		<p>Para 3.3 is very concerning with regard to the decline in the number of 25-44 aged people, these are important to Henley's workforce. Too many people are forced to commute into the town for admin / retail jobs. There is capacity for the extra children to be accommodated in Henley's schools.</p> <p>Para 9.39 (a) and (b) are incomprehensible. It is not clear what is being proposed and neither has been argued or explained anywhere in the text. If (b) refers to the town centre traffic lights then it would significantly add to congestion to reduce the approach from Hart Street to one lane - and for what benefit?</p> <p>Public transport always gets lip service but there is no mention of anything practical to support the commercial 800/850 and X38 bus services which provide vital links for passengers in and out of the town.</p>	<p>Amend wording</p> <p>Update Transport Plan and include 800, 850 and X38 routes.</p>	<p>Noted.</p> <p>Agree, the wording should be made clearer and be amended to: “9.39. The Town Council will work with OCC and SODC to improve the public realm to provide an environment to help ease congestion. CIL contributions should be directed to funding modelling for, and possible implementation of, key projects that have been considered by the Transport Strategy Group, such as: a)Removal of some of the traffic controls at the following locations: • Greys Road/Duke Street junction •Hart Street junction b)Reducing to one lane the traffic approaching the junction from the bridge on Hart Street.”</p> <p>Noted, these routes should also be added to the Transport Plan.</p> <p>OCC already support 800/850 and X38 services through Section 106 contributions for developments in Henley.</p>
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15	L Kow	General comment	<p>[Site 6] is not suitable for development.</p> <p>Site 6 is Greenfield and [the] council must ensure that biodiversity is maintained and the surrounding green area is not affected and new housing doesn't distort the surrounding character of the area... Uprooting of trees & hedges destroy the biodiversity of the site in question.</p> <p>Upgrades to the highway network will inevitably be required to accommodate the development through the widening of the roadway and the provision of footpaths...</p> <p>Site 6 does not have safe access. Reading Road is an A road designed to provide a large-scale transport links between areas and not for access onto housing estates, whilst Harpsden Way and other lanes to the south would also be unsuitable...</p> <p>Increasing the highway network capacity would only make existing traffic issues worse for the area, and consequently walking, cycling</p>		Noted, this site is not allocated in the Plan, please see baseline report.

			<p>or public transport becomes even more hazardous!!</p> <p>The site is in very close proximity to the SSSI, and according to the Site Assessment has a medium landscape sensitivity and a medium visual sensitivity This would surely be harmed by any residential development.</p> <p>Heritage assets, including the Grade II* Listed Harpsden Court and other Grade II* listed assets ... are particularly important buildings. Therefore, we should protect and preserve their integrity...</p> <p>It is very unlikely that the scheme would be economically viable due to the entire site being Greenfield land [and] it is highly unlikely that the developer would improve the biodiversity at the site through building additional housing... .</p>		
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16	H Slea	Policy DS1	<p>There are not enough sites selected for housing development.</p> <p>I do not see any policy on the introduction of electric car charging points on the streets [apart from an] an aspiration: "New charging points will be encouraged in new and existing car parks". There are 6 Council owned car parks and I expect more than encouragement.</p> <p>I cannot see any policy on banning HGVs which do not have business in Henley and/or the immediate surrounding area. It is only loosely alluded to in policy TO4.</p> <p>Does the Town Council support the Chilterns Conservation Board's desire to extend the AONB boundary?</p>		<p>Disagree, the proposed sites for development would meet the requirements of the (Policy H3) Local Plan for housing.</p> <p>Policy on Charging Points here: T4: EV Charging Points. Advice from AECOM and SODC that this would have to be encouraged.</p> <p>AECOM advised that we could not have a policy, and instead we have mentioned this in Baseline Report.</p> <p>This is not within the remit of the Neighbourhood Plan.</p>
17	D Barraclough	Policy DS3	<p>Believe that the loss of playing fields is wrong and the school need to explore other sources of funds to carry out the repairs to the school.</p> <p>Given that the school have had the opportunity to progress this development since 2016/2017 and have taken no action suggests that</p>		Noted.

			<p>Why has a very outdated house price chart been included at 3.13? Far more recent data is readily available.</p> <p>The area needs more smaller houses, and while this is dealt with in terms of new housing mix, one key area is ignored, although I accept this may be beyond the remit of the plan. The issue is the over-development of existing small houses. We see many instances of 2-bedroom homes being turned into 3-, 4- or even 5-bedroomed homes and thus put out of the reach of subsequent buyers.</p>		<p>This has been taken from the latest 2020 Housing Needs Assessment produced by AECOM with the most up to date data available.</p> <p>The 2020 Housing Needs Assessment states that the current size mix of dwellings is well-aligned with that projected to be needed at the end of the Plan period. However, the NA would benefit from a higher proportion of three bedroom homes, some more larger homes, and few additional small homes.</p>
19	J Pitcher	General comment	Local Green Space		Noted.
20	J Knight	General comment p.14	Not viable to use the proposed combination of walking, cycling, and taking public transport to work because there is very little employment in Henley and most people are having to commute to Reading, Maidenhead, Oxford, Basingstoke, London to business parks not town centres. This would effectively at least triple commuting times so is obviously totally unrealistic on top of a typical 8 - 9 hour working day.		Noted.

		Section 9.5	Therefore, there has to be a lot more focus on improving traffic flows, e.g. another bridge over The Thames, double yellow lines on all access roads into Henley town centre, etc.		This is beyond the remit of the Neighbourhood Plan. Double yellow lines are the remit of OCC.
		Policy DS1/ DS3	How will Oxford CC avert a return to pre-lockdown levels of traffic? The only way this is achievable is if the government mandates working from home.		Noted.
		Policy DS7	The [allocation of] Gillotts School field site is very short-sighted as the size of the site has to be retained to enable expansion of the school to meet the needs of the increased population as a result of the many building developments proposed.		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.
		Policy DS1	Highlands Farm, M1, should not be allowed as this development should be considered purely on the original site prior to any development. The current Highlands development should not enable this to be considered as a developed area thus enabling		Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the results of each site assessment which was

			<p>continuous further development, such as this M1 proposal. In addition, the current development has already spoilt the natural beauty of this green field site.</p> <p>The combined proposed developments of Highlands Farm, M1, Gillotts Playing Fields, Chilterns End and Chilterns Centre would place far too much traffic pressure on Greys Road. Post lockdown Greys Road congestion is now the same as on Remenham Hill at peak times, adding at least 20-30 minutes to journey times which is unacceptable. Commuters have no option but to travel by car at peak times at most offices require staff to be at their desks by 9am.</p>		<p>considered suitable by independent professional consultants AECOOM.</p> <p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>
21	N Balchin	General comment/ RO1-5	<p>I support any actions that would encourage co-working spaces for individual entrepreneurs, small businesses, and similar groups within the Henley town centre, to increase the footfall and wallet size to the many hospitality outlets and shops. In other words, many of your objectives would gain greater success if focused more on 'micro-commercial' (a growing</p>		<p>Additional employment land and retail provision are both requirements for the NP set by the Local Plan (Policy EMP5 and TC1) which has been through examination and adopted.</p>

		General comment/EO8/ TO5	sector) rather than 'retail' (a declining sector). I also recommend that parking spaces be developed and/or expanded on the north and south sides of Henley rather than the proposed increases/changes to town-centre parking. This would help to address the stated poor air quality and reduce the queues of tourist and business traffic entering the town centre that is simply trying to find a parking space. The existing town centre parking should be focused on satisfying the needs of the shops whose customers tend to use trolleys or buy larger amounts (and therefore need a short distance to their car).	Refer to the following in the supporting text: "The Town Council's Transport Strategy Group are looking to promote use of the long stay car parks on the north and south of the town, including the Rugby club and station car parks."	Noted, Policy T6: Parking and Standards considers the parking provision for the town. The Town Council's Transport Strategy Group are looking to promote use of the long stay car parks on the north and south of the town, ie Rugby club and station car parks.
22	S Browett	Policy ENV5	I am objecting to the latest plans re-drainage. They are environmentally unsound.		Noted, this would be considered at detailed planning application stage.
23	DC Whitehead	pp. 12 and 50	The 'First Homes' category is not relevant to Henley due to the £250,000 upper limit.		First Homes now form the definition of affordable housing and are required nationally following a ministerial statement released on 24

		<p>p. 21</p> <p>p. 31, ENV4</p> <p>Policy DS1</p>	<p>Delete 'promoting the amenity of all' as this is not possible.</p> <p>The copse between 53 and 59 Blandy Road should be included in this list as it was donated to residents of the town by the developers of the estate.</p> <p>Gillotts School Playing Field should be removed from the sites allocated for development as it is not required for the town to meet the number of new homes allocated by SODC, and because the need for playing fields will only increase as Henley's population increases.</p>	<p>May 2021 Planning Policy changes came into effect on 28 June 2021.</p> <p>This is an objective rather a requirement of the Neighbourhood Plan.</p> <p>This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.</p> <p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p>
24	L Silver	General comment/ SO1	Housebuilding in our area has led to an increase in demand on medical services with no concomitant increase in either surgery buildings or provision. Wallingford medical practice has shut its list and I expect other practices will follow. For every 2000 people one needs a	The Bell and the Hart surgery were visited and sent a questionnaire and both reported that they welcome new patients. The Bell Surgery's current list is 8,633 and their maximum list is 10,500. They have already responded to a capacity survey by the CCG in 2017 that they would be happy to recruit another GP if the additional patient numbers allowed for the

			<p>minimum of 1 GP who has an approximate back office of 7 other staff (nurses, receptionists, practice manager etc).</p> <p>Average practices [now have] 9000 people per practice. With the housebuilding, provision must be made for medical care... The current surgeries can no longer cope with the demand. My practice list size is rising by 4 percent per annum. This is approximately 2000 appointments per annum [which] we need to find from a limited number of doctors. This is leading to rising waits.</p>		<p>funding of a full or part time GP. Surgeries have confirmed there is future capacity available. CCG involved, development will contribute to these things. Funding is allocated to the CCG from CIL contributions.</p>
25	W Johnson	ENV4 – Bottom of Little Hill	<p>This area appears to be the private family garden of our home, Garden Cottage, and to object to its inclusion as a proposed Local Green Space in the Draft Plan and any subsequent versions of the plan.</p> <p>Our family garden’s proposed designation as a Local Green Space is inappropriate as: (1) it clearly does not meet the criteria for designation set out in the National Planning Policy Framework (“NPPF”); (2) the decision by the Neighbourhood Plan Committee to</p>	Remove as Local Green Space.	Noted, following comments received it is considered that this site should be removed as Local Green Space.

			<p>propose our garden as a Local Green Space appears to be based on insufficient evidence; and (3) the Neighbourhood Plan Committee appears not to have followed all the procedures as set out in the Planning Practice Guidance...</p> <p>1.Our family garden clearly does not meet the criteria for designation set out in the NPPF. As set out in the NPPF: ‘The Local Green Space designation should only be used where the green space is... (b) demonstrably special to a local community and holds a particular local significance...’ Our family garden does not meet this criteria. In particular... this area is our garden. It is not accessible to the public, nor has it, to our knowledge, ever been open to the public in any capacity... .</p> <p>2.The decision by the Neighbourhood Plan Committee to propose our garden as a Local Green Space appears to be based on insufficient evidence. It is unclear by whom and on what basis our garden is recognised as a priority habitat. I note that our garden is not designated as a priority habitat (now called NERC Act S41 Habitats of Principal</p>		
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			<p>Importance) in the habitats dataset held by Thames Valley Environmental Records Centre, which I understand to be the most accurate and comprehensive for Oxfordshire (and one used by planning authorities).</p> <p>3.The Neighbourhood Plan Committee appears not to have followed all the procedures as set out in the Planning Practice Guidance in proposing our garden as a Local Green Space. The Planning Practice Guidance states that local plan makers:“...should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan”.</p> <p>However:</p> <p>i)we have not been notified nor contacted about the proposed designation of our garden as a Local green Space, which only came to our attention on 2 October 2021 as we happened to look at the Draft Plan once it had been put out to public consultation.</p>		
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			ii)none of the Draft Plan documentation appears to contain nay explanation of why the guidance has not been followed.		
26	D Duggan	Policy DS1 Policy DS8	I disagree with the proposed number of homes to be built. In particular those and the top of Greys Rd. The traffic on the Reading Road is already unacceptable. The intersection where Greys Road meets the Reading Rd will not be able to cope with added traffic from new developments planned at the top of Greys Road. Already there is a considerable back flow from the carpark situated between Market Square and Greys Rd.		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
		Vision and objectives/ General comment	I would also like to add that the traffic, congestion and pollution caused not only by the volume of cars, and more importantly the lorries using Henley bridge and town centre is a rat run. The people of Henley have signed a petition requesting that certain lorries depending on their tonnage should be banned. Nothing to date has happened. Until pollution, traffic and the infrastructure is improved then no further homes should be built. At		The neighbourhood plan supports the environmental weight limit. The Bell and the Hart surgery were visited and sent a questionnaire and both reported that they welcome new patients. The Bell Surgery's

			<p>the moment the GPS in Henley cannot deliver a satisfactory service. They are simply overwhelmed by their caseload. Another consideration must be the schools and whether or not there would be enough school places available if the proposed number of new houses throughout the area were to be built. Also, there is the Fire service and whether in an emergency a crew could get to the site of a fire if the traffic and congestion is increased.</p> <p>Sadly, the Police Station was closed a number of years ago. This is not acceptable to expect Police to attend the scene of a crime when the Reading Road is so congested and will become more congested when more houses are built throughout the area. This applies to houses being built of the Marlowe Rd and the fair mile. What Henley needs is a youth centre. Perhaps this could be built at the top of Greys Rd. presently there is nowhere for the young to go other than hang around outside of the Catherine Wheel. If houses are to be built in Oxfordshire perhaps it would be better to set land aside for new towns. This has</p>	<p>current list is 8,633 and their maximum list is 10,500. They have already responded to a capacity survey by the CCG in 2017 that they would be happy to recruit another GP if the additional patient numbers allowed for the funding of a full or part time GP. Surgeries have confirmed there is future capacity available.</p> <p>There has been confirmation that there is space in majority of primary schools.</p> <p>The Plan has strong environmental policies including those on air quality. OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>This would be the remit of the Thames Valley Police.</p>
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			<p>worked very well in the past. Look at Milton Keynes [and] Letchworth.</p> <p>Please reconsider the number of houses that are planned. The town will be totally ruined, as there are not enough car parks, the pollution will only get worse and more people will develop the Henley Cough and put more of a burden on the Henley Medical services.</p> <p>Please, get your priorities and infrastructure right before even thinking of building vast number of houses which would increase the population to unprecedented numbers which the infrastructure as it stands cannot support. Before you do anything, sort the Lorry Problem out. I would also like to add that the parking in Ancastle Green is becoming more difficult for residents. Not only to the college kids park there, but people who come to the town park there as the car parks are full.</p>		<p>The housing requirement is set by SODC in the adopted Local Plan, which also requires the Neighbourhood Plan to seek to meet local affordable housing needs, even where this would result in the housing provision in excess of the outstanding requirement.</p>
27	J Louth	Policy HEN1	In the town centre area, ground floors are typically inhabited by retail or business premises. This		Noted.

			<p>has created a mindset among planners and Town Councillors that Hart Street, Bell Street, and Duke Street are 'commercial streets.'</p> <p>In fact, buildings on these streets contain many residential units. In Hart Street SODC collects residential waste from 30 homes. There must be a similar number in neighbouring streets.</p> <p>The interests of these residents can easily be overlooked in the pursuit of the Plan's goals. A bus stop replacing residents on street parking, a night club with 4 am closing... It's easily done.</p> <p>I would like HEN1 to note that all developments must protect or enhance the quality of life of existing residents.</p>		<p>Noted, however policy HEN1 is a Local Plan policy which has already been adopted and is not part of the review of this Neighbourhood Plan.</p>
28	D Feary	Policy DS7 Policy DS3	<p>Further development at Highlands Park along with Sites C and 991 will increase the traffic and pollution on Greys Road as all facilities for these new residents will be in the lower town.</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>

		<p>Policy DS4</p>	<p>This to include 1,500sqm for a single format food store. And so attract plenty of parking to Greys Road car park. Stop treating Highlands Park like a dormitory suburb of Henley and treat it more like a village extension with some basic facilities. Move the "1,500sqm for a single format food store" from the Stuart Turner site [Site E] to Highlands Park. This will also service existing residents in the Elizabeth Road area and the Makins Road area.</p> <p>Also, allow room for some green space and other utilities that will be required. This will relieve some of the existing stress on Greys Road.</p> <p>Instead of the food store, build an indoor market and include small affordable lock-up shops to add more variety of the shopping experience of Henley - as so attack more visitors to our retail space.</p>		<p>Policy E2 and Local Plan policy TC2 direct retail towards the town centre.</p> <p>Requirement of the policy is to deliver publicly accessible open space.</p> <p>A single format food store with at least 1,500sqm net sales floorspace is a requirement of the Local Plan Policy TC4.</p>
		<p>Vision and objectives/ General comment</p>	<p>WHERE IS THE VISION FOR HENLEY? The extra houses and residents will overload some of the facilities of the town and will collectively threaten the unique identity of Henley.</p>		<p>Noted, the Baseline Report sets out the current infrastructure position and demonstrates that there is capacity.</p>

			<p>Three sites, in particular, will decide the character of Henley in 10 years-time.</p> <p>1. Site 853a must be a community with facilities and at least partially independent of the town centre for necessities.</p> <p>2. Site E. The design of this site should be given the utmost consideration and imagination will be required. It is close to the heart of Henley.</p>		<p>There is a requirement that 1h of employment land and open space is provided on this site. This site would have to comply with policies SD3 and H1 which would require a design brief and also policy DES1,2 and 3 of the Local Plan which seek delivery of high quality development.</p>
		Policy T5	<p>3. The Station Car Park is essential for workers and visitors to the town. Policy T5 should be extended to say specifically that the station car park should be retained for parking. If a hotel is to be built there, then a second tier to the existing parking area alongside the railway line should be added as part of the development.</p>	Proposed changes to wording of policy.	<p>Agree, proposed changes to the wording of this policy to require any development on existing public car parks to demonstrate that the overall number of car parking spaces available to the public and their ease of use is adequate to meet the needs of the town centre and railway station.</p>
29	E Cope	Pages 14-16	<p>Henley's current road infrastructure struggles with current traffic load and therefore is not suited to additional traffic, both residential and logistical, that</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on</p>

			would be generated by additional housing and retail space.		highway safety, or the residual cumulative impacts on the road network would be severe.
		General comment	<p>Whilst the pandemic forces many people to work from home, it may have given a false impression of a reduction in traffic. Gradually, the pre-pandemic daily queues on the Fairmile, Remenham Hill and the Reading Road are returning. Outside peak hours, one could be fooled into thinking the Fairmile is a racetrack frequented by motorbikes and supercars - if the police or council placed a mobile speed trap there they could make a small fortune. I strongly believe that our roads massively struggle to cope with current traffic demands, both in the centre of town and main routes into the town.</p> <p>Until these are addressed e.g. by banning HGVs that are not servicing local retail, we are not set up to support additional housing.</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe</p> <p>The NP supports the Environmental Weight Limit on the bridge.</p>
30	C Stephens	Policy DS3	Unsuited to development through a narrow one option access point whose use for access and construction across it is dubious given previous covenants. Also,		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate

			loss of sports pitches and facilities related thereto is poor to say the least. Interested on Sports England's comments on this matter during Statutory Consultations.		allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.
		Policy DS1	<p>Generally, most sites are suited to development as long as the LAs involved actual write into policy that all new build units should achieve Zero Carbon/Passivhaus credentials and never allow these to be diluted by developers.</p> <p>Affordable Housing levels should be set in policy and again never allowed to be diluted; all too often Planning Authorities give in to bleating developers about viability and thus dilute affordable housing requirements, if they are set in stone and stuck too then this will impact land prices and will always become viable.</p>		<p>All new development would have to comply with SD1 a and b and DES8 and DES10 of the Local Plan.</p> <p>Development would have to accord with Policy H2 and the policies set out in the local plan for affordable housing.</p>
		General comments	The Consultation documents are long winded and full of padding. It could have been distilled to about a dozen pages and more people never involved in development could understand and comment upon!		Ok.

31	DN Smith	SO3	There is no mention in the NP proposals for public tennis courts in Henley.		This is not a requirement for the Neighbourhood Plan.
		Policies TO1 – TO5	<p>The County Council is promoting 20mph in all towns and villages Oxfordshire. Why is this not included or mentioned in the NP? The current 20mph zone only covers the town centre, where it is difficult most of the time to exceed 20mph.</p> <p>Surely steps should be taken to electrify the Henley Branch Line? Network Rail were not interested in this (financial constraints) when the electrification to the mainline was carried out.</p>		<p>This would be the remit of OCC. The 20mph limits now promoted by the County Council are a recent development and still subject to confirmation of funding. However, it would be prudent to add consideration of the extension of 20mph limits to the list of projects for the Transport policies.</p> <p>This is not a land use and not within the remit of this Neighbourhood Plan. This would be the responsibility of Network Rail.</p>
		Policy T4	T4 - why is there no policy on stopping HGVs - who have no business Henley and the surrounding area - from travelling through Henley?		The Neighbourhood Plan supports this environmental weight limit.
		Policy ENV4	<p>Watermans's Spinney - this self-seeded copse of dubious benefit to the community. It is not easy to get into. What is so special about the copse? It should be built on.</p> <p>Parkside Wood - Parkside was developed from a wooded area. What is so special about the</p>		<p>The area is recognised as a Priority habitat – deciduous woodland and is covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p> <p>The area is recognised as a Priority habitat – deciduous woodland and is covered by a Tree Preservation Order. It is not protected by other</p>

			remaining copse? It should be built on.		designations and therefore warrants designation for Local Green Space. It provides a link between Friar Park and towards the woodland at Henley College creating nature corridors.
		General comments	Why is Henley so resistant to housing development? Many of them live in houses built since 1945, on land which prior to that were green fields. Henley will only progress economically and attract a better range of retail & commercial businesses if the population (number of houses) increases.		Noted.
32	H Fraser	Policy DS8	<p>Wording in the blue box appears to be inaccurate/confused - I could not see Site U in the plan.</p> <p>It refers to “Residential proposals coming forward result in the loss of the facility should demonstrate that: (i) suitable alternative provision is made for the facility (or similar facilities of equivalent community value) on a site elsewhere in the locality, or (ii) in the case of recreational facilities, it is not needed, or (iii) in the case of commercial services, it is not economically viable.”</p> <p>Does this mean the youth centre is being relocated? If yes, it is not</p>	Update text and remove reference to site U.	<p>Agreed.</p> <p>This is a requirement of this development obtaining planning permission and would be dealt with at the planning application stage.</p>

			obvious where it will be relocated to.		
		Policy DS2	I would like to confirm that access from the new site to Luker Avenue will be for pedestrian and cycles only so as not to bring more traffic onto a residential street.		Noted. Vehicular access for this site will be from the Fairmile.
		Section 5.35	Sewers - how will the plan ensure that there is no additional discharge of raw sewage into watercourses, including the Thames, in periods of heavy rain		This would not be responsibility of Henley Town Council or the Neighbourhood Plan and would be the responsibility of Thames Water.
		General comment	What provision is there to force new buildings to adopt PassivHaus Standards or to have solar and ground source heat pumps as integral to the new development?		All new development would have to comply with policies SD1 a and b and policies DES8 and DES10 of the Local Plan.
33	D Brough	Policy DS7	<p>In the document [the NP] it says, "The site is well located to the town". I would say that this, in terms of the climate crisis we find ourselves in, is about as bad as it can get.</p> <p>There is not a "good" bus service - it is not regular enough - and therefore people will have to use cars. The idea that they will not is flawed, in my view.</p>		<p>It is on an existing bus route with pedestrian and cycle links available.</p> <p>The Town Council and Neighbourhood Plan aim to support the bus service.</p>

		Policy DS3	<p>Gillotts School. I thought this was one of the least popular options but may be mistaken. How did it ever get into this plan? There is a clear line of development here at the back of Makins/Blandy Road and if the Gillotts School development goes ahead, then development will probably continue in the future and Harpsden will become part of Henley. The green ribbon around Harpsden will be lost.</p> <p>In addition, the school needs to do this for maintenance purposes, but in due course, they will need to do it again, but having sold the family silver will need to find other ways of funding. They should find these alternative methods of raising funds now. It's poorly thought out and makes no sense. If Gillotts School were to go ahead, it would be just a matter of time before Lucy's Farm gets the go ahead for development. The access would be there and the precedent. The two sites cannot be separated, so Gillotts School is a big NO for me.</p> <p>I'd rather have Highlands than Gillotts School, though neither makes sense.</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p> <p>Site 1126 Lucy's Farm was assessed by independent professional consultants AECOM and deemed to be unsuitable. The assessment found that the site would not be suitable for allocation in the Neighbourhood Plan as it does not meet local policy. The site is adjacent rather than within the built - up area. There are also a number of other constraints that impact the sites suitability including access and potential risk of coalescence between Henley and Harpsden. A primary objective is to ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other.</p>
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		HO1 Policy DS1	Overall, development should be focussed in the locations closest to the centre of town. Buses to outlying areas should run every 15 minutes, otherwise they are bordering on useless, except for a few, for whom of course they are useful. But we need to make buses work for many more people and that means being able to hop on a bus within 15 minutes from more or less any point.		The Town Council and Neighbourhood Plan are looking at supporting and the potential expansion of this bus service.
34	A Lynch	Policy DS7	Access to Greys Road may be good, but this will lead to severe traffic congestion at the Town Centre end of the road.		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Agreed. Noted.
		Policy DS3	There will be similar consequences [as above] with site C.		
		P. 110	Visitor hotel accommodation (including the expanded Red Lion and AirBNB, as well as possibly Imperial Hotel) is fully adequate.		
		Pp. 129-33	EV Charging Points - I don't think the Council fully appreciates the extent of the requirement for charging points, especially as regards on-street parking and in car parks. Even now, the very limited number of cables trailing across pavements present a hazard to pedestrians.		

35	D&H Fryer	Policy ENV4	<p>Suggest that the Copse at 55-57 Blandy Road is included. It is Title No. ON96456 Registered at the Land Registry.</p> <p>Suggest that the Play area at Lauds Close is included. It is Title No. ON48033 Registered at the Land Registry.</p> <p>Both these areas were given by developers to the community for their pleasure use. The Deeds of both are lodged with the Henley Town Council who at the time were encouraging developers to donate small parcels of land for community use under previous neighbourhood plans. Both parcels of land have restrictive covenants on them.</p>		<p>This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.</p> <p>This site has been considered as Local Green Space but doesn't meet the tests set out in paragraph 101 and 102 of the NPPF.</p> <p>Noted.</p>

		Policy DS1 Policy DS3	Gillotts School Playing Fields – remove this site [because] on the previous neighbourhood plan, it was considered that the application may fail and so additional land for development at Highlands Farm was allowed. Having agreed the latter, then Gillotts should be removed. The site is also landlocked without any suitable sites which could be used for the two access roads necessary. The change from a sports field to a fully developed site will be harmful to both the landscape character and the adjoining AONB.		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.
		Policy DS4	Empstead Works/Stuart Turner Site - remove at least Stuart Turner from this plan as it is the only area in central Henley which could be used for necessary future car parking. It adjoins the existing Greys Road parking and the existing entrance/exits would satisfy this future extension.		Noted, this site is already allocated within the existing JHHNP and it has been confirmed that it is deliverable in the Plan Period so is proposed as an allocation.
36	T Wright	Policy DS4	The Town Council are conducting additional air quality testing, including of particulates in Greys Road. The Council decided to extend the nitrogen dioxide measuring in June 2021 because it was concerned about some high		Noted, this site is already allocated within the existing JHHNP and it has been confirmed that it is deliverable in the Plan Period do should be taken forward from existing plan.

			<p>results. Based on the extract above taken from Policy ENV1: Air Quality, surely we need to revisit this development.</p> <p>The addition of 42 dwellings and at least the same amount of cars will impact on Greys Road and access to Reading road, the main through route severely adding to the already high particulate results at the junction with Bell Street.</p> <p>This will also be impacted by further development happening at Site X Henley Youth Club (23 dwellings), Site Y Chiltern Centre (3 dwellings) and M1 Northern Field at Highlands Farm (110 dwellings) and other plans being "rolled forward". The junction with Greys Road will become a bottle neck with the same effect as Duke street with regard to Air Quality.</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>
37	C Bond	Policy T5	<p>The station car park in Henley should be maintained as a car park to allow for the expected increase in rail traffic (and as a facility for the town)</p>	<p>Proposed changes to the wording of this policy.</p>	<p>Agree, proposed changes to the wording of this policy to require any development on existing public car parks to demonstrate that the overall number of car parking spaces available to the public and their ease of use is adequate to meet the needs of the town centre and railway station.</p>

		Policy DS3	Gillotts playing fields should not be used for housing. (Another way to support the school needs to be found.) Development of this area is unnecessary and would add significant traffic to that on St Andrews Road and Greys Road, which are already going to get very busy.		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM. OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. See EV charging policy. All new development would have to comply with SD1 a and b and DES8 and DES10 of the Local Plan.
		Policy H1	New builds should have green energy technology included as standard (not just where possible) - e.g. charging points for electric vehicles and solar panels.		
38	S Morton	General comment	Overall, I am pleased to see the work being done to update this plan.		Noted.
		Para 3.3 Policy EMP 5	These population stats reinforce the fact that working age people are driven out of Henley by high property prices and the need to find employment. I am therefore		Noted.

			pleased to see policy EMP5 in the plan.		Noted.
		Para 3.11 Paras 3.16 – 3.17	The high proportion of one-person occupancy goes along with the higher proportion of 65+ age group in 3.3. This reinforces the need expressed in 3.16/3.17 for more 1 or 2-bed properties - both for first-time buyers and for retired people to 'downsize' into.	Include Key View 9.	Noted, add Key View 9.
		Section 6 – key views	I note that Key View 9 is missing. This is disappointing as it is the one which would show the proposed development area on Gillotts School playing fields (site C, sections 11.11 onwards).		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM. OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on
		Policy DS3	I continue to believe that this site should not be developed; it would extend the built boundary of the town and set a bad precedent for eroding the AONB on the edge of Henley; it would drive an increase in traffic through existing residential streets; and it would reduce outdoor sports facilities at the school. I am pleased that the plan now expects 'exemplary replacement		

			<p>sports facilities' but this is aspirational rather than being a requirement. I would prefer this site not be developed, but if it remains in the plan then the need for replacement sports facilities must become a requirement.</p>	<p>highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>National policy states that planning obligations must only be sought where they meet all of the following Tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.</p>
		Policy T4	<p>Henley now has *fewer* public EVCP's than it had a year ago, with the removal of two charge points from Kings Road Car Park. Given the number of dwellings in Henley with no off-street parking or ability to install a private charge point, this seems a retrograde step and counter to T4.F - what powers does the Council have to implement this policy? I welcome the aspiration but without powers to implement it has little value.</p>	<p>These charging points are due to be replaced. New development that requires planning permission will need to comply with Policy T4 and also the Standards set out in the Oxfordshire Electric Vehicle Infrastructure Strategy.</p> <p>Agree, proposed changes to the wording of this policy to require any development on existing</p>

		Policy T6	<p>I am pleased that the plan wishes to encourage more use of the station car park. To that end I would like to see a requirement that any development in that area results in no reduction in the overall number of spaces. Proposals to build a hotel there would have reduced the parking - the retention of parking spaces must be made a requirement for this site, given the shortage in space reported in section 9.74. Could some resident spaces be created there to alleviate the shortfall?</p>	Proposed changes to the wording of this policy.	public car parks to demonstrate that the overall number of car parking spaces available to the public and their ease of use is adequate to meet the needs of the town centre and railway station.
39	A Osborne	General comment/ Policy DS1/ HO1	<p>I write my comments on the JHHNP having spent 10 minutes watching a green woodpecker find food on our lawn. This is just one example of the wide variety of birds, animals and insects we share our town with. I am proud to live in a town where our children have access to wildlife in this way.</p> <p>I am concerned that the development of green spaces for housing will cause irreparable damage to the environment and biodiversity of this beautiful area. The woodpecker in question most likely lives in the area on the Gillots side of our town, a</p>		<p>Yes, there is a requirement to go above the housing requirement in Policy H3 of the Local Plan which states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision</p>

			<p>beautiful and diverse area between here and Harpsden on the edge of the AONB (policy ENV2, pg 27).</p> <p>I remain in favour of prioritising brownfield development to fulfil our housing quota. I believe that when the required numbers of housing are calculated (taking into account sites on which housing has already been approved but not part of the original plan such as Wyevale, plus additional windfall housing considered part of this figure) we exceed our quota.</p>		<p>in excess of the outstanding requirement shown in Table 4d.</p>
		Policy DS3	<p>Therefore, the development of Gillots Field is not required to fulfil the quota (see p. 74 and 77-78 of Draft Plan). The Gillots Field development goes against many of the Plans objectives including EO1, EO2, EO3, HO2, HO3, HO6, TO1, TO3 and will struggle to meet the requirement of many of the policies satisfactorily.</p> <p>It is worth noting that the copse between 53 and 59 Blandy Road which is proposed as the access point for the development of Gillots Field does not currently feature in the list of green spaces</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p> <p>This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.</p>

			<p>(pg 31) of the Draft Plan, despite being donated to residents of the town by the developers of the estate.</p> <p>Development of Gillots Field is also likely to increase traffic going into town on key roads such as St Andrew's/Reading Road and the bottom of Greys Road which is already very congested at peak times (p. 56). We have already declared a climate emergency and designated an AQMA (p. 24). I'm concerned additional traffic from more housing on green spaces (which by nature are typically on the fringe of town and away from the centre lending car use more convenient/likely) will exacerbate the problem and potentially make the area of town where air quality exceeds national standards much bigger. I walk to work and already find the fumes at the bottom end of Greys Road unpleasant and the air quality in town is a concern for our children.</p> <p>Additionally, St Andrews Road already carries a lot of traffic and increased traffic from this development poses health and safety risks to children such as</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>
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			<p>mine who walk to Trinity, Sacred Heart and St Mary's Schools and also those who walk to Gillots. Currently it is very difficult to cross St Andrews Road safely on the school run. Traffic travels far too fast and the volume is already high. Lack of social housing in the Draft Plan is also a concern (p. 50).</p> <p>With Henley house prices so high even with the help of government schemes many hard-working local people would still struggle to access the proposed affordable homes as rental and sale prices would still be too high (only discounted by 30% of market value see 7.4a p. 50). This is already an issue with the new rented homes on the Highlands Estate where families on low incomes are reported to be struggling to afford the rent.</p>		<p>The NPPF definition of affordable housing is the accepted definition in planning policy and development management decision-making.</p>
		Policy H1	<p>It is important we prioritise retaining the special character of our town when developing brownfield sites (p. 48). I'd like to see more sympathetic design and use of local materials in line with the original town. The recent development of Gardiner Place and the flats on Deanfield Avenue</p>		<p>Policy SD3 sets out how proposals should contribute towards the local distinctiveness of Henley and Harpsden. The Conservation Area Appraisal Management Plan 2021 evidence document identifies and provides analysis of the different character areas and sets out building materials and architectural details for each.</p>

			<p>are, in my opinion, examples of design that is at odds with the architecture of our town.</p> <p>Henley is a very special place to live, work and be educated. Let's protect our green spaces where we can and preserve the special nature of our town for all its inhabitants now and for the future.</p>		Noted.
40	V Carlton	General comment	Henley is full and cannot cope with more cars or people. The infrastructure is creaking at the knees. Traffic is beyond acceptable. We now have to leave an additional 10-15 minutes just to get out of Henley at certain times of the day.		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>Yes these issues have been considered through the Plan process and as part of the evidence as set out in the Baseline Report.</p>
		Para 3.3	Air quality, road traffic and congestion are an ongoing issue. Thameside up the length of Station Road to Reading Road is a constant bottle neck and log jam with stationary traffic emitting fumes for long periods of time. We have tried to leave our car park (Perpetual House) on a number of occasions wanting to turn right and go up to Reading Road and have just given up because of the long delays and congestion.		

		<p>Para 5.4</p>	<p>Air quality may well be fine at the development site but will inevitably impact on Henley Town with the increase in vehicles into the town thus adding to the already appalling and excessive levels of air quality. We need action to improve the air, not to continue monitoring it. We need to ensure that all new development has to run and pass air pollution tests prior to development approval being given. It's too late to do the tests after planning permission has been given.</p>		<p>The purpose of Policy ENV1: Air Quality to ensure that all major development and substantial refurbishment demonstrate that it is 'air quality neutral'.</p>
		<p>Para 5.10</p>	<p>Closed shop doors are not conducive to encouraging shoppers and is a poor solution. Any level of cycling and walking initiatives is not going to reduce the number of vehicles using Henley to get elsewhere.</p>		<p>Noted.</p>
		<p>Para 5.29</p>	<p>Green spaces recommended for Designation - where is the Copse? This was donated to the town and needs to be included. The land between 53 and 59 Blandy Road.</p>		<p>This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.</p>

		<p>Para 5.3</p>	<p>Why is any development allowed in flood risk areas? Development should be banned from these sites; even flood risk 1. It's inevitably going to create problems not only for the owners/residents of the homes but for the council trying to unravel the mess once the developers have long gone.</p>		<p>This is set out in National Planning policy which seeks to avoid the risk of flooding, where possible.</p>
		<p>Para 6.23</p>	<p>You quote that it is important that development relates well to the design of existing local buildings etc., it is imperative that such submissions as the Premier Inn are rejected vigorously at the earliest possible stage so that we can protect the town from cheap to build and offensive to look at designs. We need to protect the integrity of the design of town buildings so that design quality in new proposals is not compromised; they should demonstrate high quality, sustainable and inclusive design and architecture as stated in Policy SD3.</p>		<p>Noted, this is being dealt with through a planning application and not through this Neighbourhood Plan.</p>

		<p>Para 8.3</p>	<p>You state that the 'Reading Road Industrial Estate will be protected for employment; non employment generating proposals will not be supported' yet permission has been given for an office block to be converted into flats. Why has this occurred?</p>		<p>Employment policies in this Plan and the Local Plan seek to protect employment land. However, Permitted Development Rights set out at national level allow conversions of offices to residential in some circumstances without the need for full planning permission. Policy ENV1 deals with Air Quality and seeks to go beyond what is required through the Local Plan. This policy requires all development to demonstrate that it is 'air quality neutral' and be less polluting than existing development.</p>
		<p>Paras 9.6 – 9.14</p>	<p>Mostly deals with Air Quality and congestion again. The people of Henley have been struggling with poor air quality and traffic jams for years. Any development will only add further to these issues. You acknowledge that there is a health risk but all that is happening is constant monitoring and no real action to improve the well-being of our health.</p> <p>What do we have to do or what stage does it have to reach before the Council takes the necessary action to stop putting our lives at risk? Ella Adoo-Kissi-Debrah, who lived near the South Circular Road in Lewisham, south-east London,</p>		<p>The Town Council are dedicated to bringing forward projects to help with Air Quality Issues.</p>

			<p>died in 2013. An inquest had found air pollution "made a material contribution" to her death. The Coroner has called for law change as a consequence and my understanding is that the Government may be sued by several families suffering similarly.</p> <p>Do the people of Henley have to take similar action. You are aware of the issue and therefore culpable. Until traffic that is merely passing thought to get elsewhere is redirected, then this situation will only worsen. With the consequent huge developments in the pipeline it doesn't take Einstein to figure out the impact on the town.</p>		<p>This is in terms of improving walking and cycling routes and providing access to businesses, shops and leisure pursuits.</p> <p>The Town Council are looking at ways to support the environmental weight limit.</p>
		Para 9.25	<p>I am interested to know how widening the pavements, which may well be aesthetically pleasing, is going to improve traffic flow through Henley. There must be a 'joined up' plan to solve the problems.</p>		
		Para 9.35	<p>Considering environmental weight restrictions needs to be done but the Council's solution seems to be to approve more development to pay for such restrictions. End</p>		

			result? More congestion and higher poor air quality.		
		Policy DS1	<p>There are another 110 properties to be built on the northern field of Highlands Farm (Crest Nicholson). We do not also need the development of Gillott's School playing field to meet the allocation of the required number of homes by SODC. Allow the build at Highlands and remove Gillott's playing field from the JHHNP. With all of the extra people moving into Henley as a consequence of the major development, there will be more children and the need for the playing fields will increase. Has the consequence of all of this development been considered with respect to Climate Change? Where is all of the energy going to come from? How are we going to make enough electricity to run all of the cars let alone running homes?</p>		<p>Yes, there is a requirement to go above the housing requirement in Policy H3 of the Local Plan which states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d.</p> <p>The site has been considered in terms of climate change and this is set out in the Baseline Report. This would be for the Electricity Supplier rather than this Neighbourhood Plan.</p>
41	C Bone	General comment	My first concern is that I do not feel that enough effort has been made by the council to make the details of the plan available to the general public and especially to		Noted, however this has been publicised through the distribution of a leaflet to every household in Henley and Harpsden and allowing people to request a paper copy. There were also press releases and advertisements in the Henley

			<p>those who are not "digital natives" such as the elderly or infirm. Drop-in sessions are not enough in my view and expecting people to come to the Town Hall to collect "consultation feedback" forms is not good enough, it should be possible to request to be mailed any materials on request. I feel a large part of the community is in the dark because of this process. You should have done a Town Hall meeting as a minimum.</p>		<p>Standard and Henley Herald. The Drop In sessions were held in the Town Hall over a period of 9 hours on 2 separate days.</p>
		<p>Policy DS1/HO1</p>	<p>Whilst I appreciate and in general support the need to continue to evolve the housing and economy of the area, I feel that a higher burden on new housing is being placed on the Greys Road area and in particular the Highlands Farm area, three sites alone (Site F, Y and M1) propose 140 dwellings out of the total. There is very limited public transport in this area and it is too far from the Town centre and many other facilities to allow walking or cycling for most and therefore many more cars will be added to Greys road and others in the area will be used as access such as Elizabeth, Nicholas and Valley Road.</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. There is an existing bus service which the Town Council and Neighbourhood Plan aim to support.</p> <p>The purpose of Policy T2 Active Travel is to encourage greater levels of cycling and walking and the use of public transport.</p>

			<p>As it already stands it is difficult at times to get across Greys Road by foot to access Millennium field, Gillotts road and so on, priority seems to be given to road traffic and not pedestrians and this is not acceptable or in keeping with statements made about the environment and traffic plans. More action must be taken to both discourage the use of private vehicles (more public transport for example) and to encourage walking and cycling (pedestrian crossings, reduced speed limits including extending the 20mph limit to all residential areas and policing of such limits!).</p> <p>I would propose that the 30mph limit on Greys Road be extended past the intersection of Highlands Lane towards Rotherfield Greys, this should be done now and not wait for an additional housing development as per Policy DS7.</p> <p>Consideration should be given to the addition of small convenience store in the Highlands farm area to assist with reducing short trips to the town centre or One Stop shop area.</p>		<p>There is a list of priority projects that have been identified in the Plan which is set out in Appendix A.</p> <p>Noted, this will be considered by OCC.</p> <p>Policy E2 and Local Plan policy TC2 direct retail towards the town centre.</p>
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		General comment	Whilst I am speaking only for myself, I can assure you that many of the elderly people in the Elizabeth Road estate area are concerned about my points above but also about the impact of increased housing on schools, healthcare, environment and much more. And whilst there is a lot of positive words in this proposed plan the feeling is that most of it will remain just words and that the developers will benefit at the expense of the existing local residents.		Noted, the Baseline Report sets out the current infrastructure position and demonstrates that there is capacity.
42	PC Stone	Policy HEN1	I'm not sure why its the council's responsibility to "support Henley College and Gillotts School to meet their accommodation needs". I think this should be done by national government.		This is a requirement set by Local Plan Policy HEN1. This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.
		Policy ENV4	Could the copse in Blandy Road be considered as a Local Green Space?		

		Para 9.53	It is not true that standard home chargers only give 3kw; I believe most provide 7kw which is compatible with most household supplies. The times quoted for charging do not appear to take account of the increasing size of ev batteries. A 62 kwh battery will take 20 hours to fully charge on a 3 kw (13 amp) supply - not 6-8 hours. Whilst it is true that a 22 kw hour charger can take only 3 hours for a full charge a 7kw will take 3 times as long.	Remove paragraph 9.53	Agreed, the supporting text should refer to the Oxfordshire Electric Vehicle Strategy (2020-2025) rather than provide specific figures as these will become out of date.
		Para 9.70	I believe the local bus service needs expanding to 6 / 7 days per week and 12 hours per day with a half-hourly service.		Policy T5 Public Transport seeks to protect and support this local bus service. The Council runs the Henley Hopper bus service and will consider increased frequency and additional routes if demand and funding allows – see Appendix A.
43	J Taylor	Policy T4	Whilst I welcome the general direction of travel in terms of recognising the need for a substantial roll-out of EV charging capacity in Henley, I believe that greater emphasis needs to be placed on establishing overnight EV charging capacity for local residents and that should be prioritised over EV charging capacity for tourists (e.g. the proposed Mill Meadows chargers).		Noted, we acknowledge these concerns, the EV Charging Sub Group of the Transport Strategy Group of the Town Council is looking at EV charging for the whole town. OCC/ SODC are also rolling out Park and Charge, to put chargers in district council car parks. These initiatives would be brought forward outside of the Neighbourhood Plan process.

			<p>In my street (Greys Hill) installing home charge points is likely to be extremely problematic due to the terraced nature of the housing on the street and the extremely narrow width of the street. Whilst not impossible to do, I feel the charging needs of residents in Greys Hill and similar streets could be better served by dedicated overnight charging capacity being made available in the town's long-stay car parks. For example, a substantial roll-out of reliable and fast (7kw+) chargers in the Southfields carpark off Greys Road would likely be sufficient to persuade me that owning a battery-EV in Henley without off-road parking whilst living on Greys Hill is actually possible.</p> <p>Without such infrastructure, my only options are to consider solutions to the substantial logistic problems of charging from a terraced house on a narrow street or simply wait for the town to catch up.</p> <p>If the town's EV charging infrastructure were more advanced, I would feel confident in making the switch to a battery-EV</p>		
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			<p>now. Whereas at present I have decided that my only realistic option is to retain by ICE vehicle until I have either solved for the on-street charging challenges or the town's infrastructure has caught up. Put more simply: the town's lack of infrastructure for overnight residential charging means I have no option other than to continue operating a polluting ICE vehicle in the town at this time, and I suspect there are many residents in a similar position who would value the support of the town in enabling a switch from ICE vehicles to battery-EVs to take place.</p> <p>On a more technical note with regards to paragraph 9.53 - I disagree that a 3kw standard charger can fully charge a vehicle in 6 to 8 hours. For example, according to the Pod Point website, the time required to charge a Tesla Model 3 using a 3.6kw charger is 15 to 22 hours. I would encourage more substantial research to be undertaken to ensure that the charge times quoted in paragraph 9.53 are accurate, and would note that it would be entirely unacceptable for</p>	<p>Remove paragraph 9.53</p>	<p>Agreed, the supporting text should refer to the Oxfordshire Electric Vehicle Strategy (2020-2025) rather than provide specific figures</p>
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			<p>the Plan's strategy around EV charging to be premised on data which is quite clearly very incorrect.</p> <p>Further, the consequence of this particular point is that the installation of overnight chargers for residents will clearly need to be at least 7kw +chargers (which takes the charge time down to 8 to 12 hours for a Tesla Model 3 according to Pod Point) to make overnight charging away from home actually viable.</p>		
44	L Greenwood	General comment/ Vision and Objectives	<p>Many of the job vacancies in the town currently are for lower paid jobs and therefore unlikely to be taken by anyone starting out who is hoping to come and live in the town.</p> <p>This puts more pressure on public transport and also parking, especially where shift working is involved, as little/no public transport is available during unsocial hours. Rather than having so much of the workforce commute into the town, could the town centre areas for development be used to provide more affordable housing for these</p>		<p>Noted.</p> <p>Sites are proposed in the town centre and also a number of new developments will come forward through Windfall.</p>

			<p>workers, which would remove the need for transport to work, reducing pollution, and also encourage people to live and work in the town and therefore invest back into it.</p> <p>Priority for such housing could perhaps be given to key workers and those working in existing local care facilities.</p>		<p>Community Led housing is proposed for Site M1.</p>
		Policy E3	<p>A covered facility for cycles should not be placed in Market Place, as it would adversely affect the appearance of that area and reduce the available space. There is currently provision for parking cycles at the railway station and this should be promoted, with perhaps another facility set up in a secure location at the other side of the town, e.g. Rugby Club area.</p>		<p>Noted, there are also cycle racks in the Greys Road Car Park and on Hart Street that were installed as part of the Active Travel 2020 funding from central government. The Transport Strategy Group is looking at how to promote the racks introduced around the town as part of this scheme.</p>
		Policy H4	<p>The plan observes that the number of older people has increased between 2009 and 2019 and that many of them live alone. This will affect the amount of larger houses being built in the town, given that some of these people occupy older, properties on larger plots. When they come up for sale, these are usually being</p>		<p>Unfortunately, we are unable to calculate the amount that will come forward via this route and therefore these would have to be considered as windfall.</p>

			<p>redeveloped with two, three or four large houses replacing the original one. This will continue to happen for some while, so the plan does not need to contain provision for larger properties as these will come online themselves, as above. Therefore, these houses should not be considered as 'windfalls' but should be taken into account when considering the number of larger properties being built.</p>		
		Policy DS1	<p>The plan now contains reference to site M1, north of Highlands Farm. The original Highlands Farm site has still not been fully developed, as there is not the demand for the high-priced properties, including flats, which are currently unoccupied and as yet unbuilt there. Given the uncertainty in the jobs market due to Covid, the rise in the cost of living and expected rise in the cost of mortgages, it is unlikely that this situation will change, so until that original site is fully built and sold, the northern part of Highlands Farm should be left as a field, as this would benefit the town and its occupants more as part of its lungs, rather than as another</p>		<p>Noted, the site allocations have been proposed to meet the requirements set out in the Local Plan and to address the local housing needs as identified through the 2020 Housing Needs Assessment.</p>

			partly developed building site, which is what much of the original Highlands Farm site is now, even after all this time.		
		Policy T4	If every new property has access to an EV charging point, the number of new properties, particularly in the town centre, would be limited by the provision of parking spaces for charging purposes. Instead, why not provide parking/charging facilities for local taxi companies to run exclusively electric only vehicles for 'set fee' short journeys within the parish (e.g. to and from home to the town centre, supermarket and railway station) and also ensure that local public transport is maintained at the current levels. This would reduce/remove the need for many residents to own a vehicle at all.		Noted, this is not in connection with a land use policy and therefore is not within the remit of neighbourhood plan.
45	V Emerson	Policy DS3	I wish to state my objection to any building on Gillot's School field. When it was first suggested that this should be used for housing I attended the meeting and display at the R & R Museum some years ago now. My main concern then		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a

			<p>and now is a question of access. There appears to be only access out onto Blandy Road which in turn leads to St. Andrews Road which is already congested and is a rat run.</p> <p>So apart from adding to this already unsatisfactory situation only having one access point to an estate of housing the size proposed is unacceptable. This is because it is dangerous in case of a major incident there should be more than one access point in case it gets blocked. I made my concerns to the original plans and it would appear that despite general objections this particular point is still unresolved.</p>		<p>robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p> <p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>
46	M Mogridge	Policy DS3	<p>It is a desecration of an area of Natural Beauty and it completely changes the aspect of the area from a pleasant local residential road to a mini metropolis where ingress and access will make the traffic and, as an extension, the air pollution excessive. Each new house will cater for two new cars as an estimate.</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p>

			<p>The assertion that the playing field is not used is false as we hear and see children happily playing there frequently.</p> <p>It is contrary to the Government's policy of encouraging schools to engage students in more physical activity in the fight against obesity in the young.</p> <p>The school management should be brought to task on why the playing field is not used more for the benefits of the pupils whilst very many inner city schools will be envious of a facility which, once built on, will be an eyesore forever.</p> <p>The reason for sale of the land is given as to improve the school's facilities. The Government has planned additional funding for education in the recent Budget and help, if needed, should be applied for which would be subject to Government scrutiny to ensure the funding is for student benefit which we all want. The current plan gives no guarantee of how the money from the sale will be used.</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>The Plan includes strong environmental policies including those on Air Quality.</p>
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			<p>There has been an offer of a fundraising campaign by local residents to help any funding in the event of a Government lack of funds which has been ignored. Why?</p> <p>The Local Plan will already add to the population growth in Henley and with it the need for Educational and leisure facilities for local children including Gillott's School.</p>		<p>The Baseline Report sets out the current infrastructure position and demonstrates that there is capacity.</p>
		General comment	<p>This is not a plan for the future but an opportunity for Developers to make a lot of money to the detriment of future generations of Henley children</p>		<p>Noted, the site allocations have been proposed to meet the requirements set out in the Local Plan and to address the local housing needs as identified through the 2020 Housing Needs Assessment.</p>
47	S Hedges	Para 3.32	<p>Cycling, walking and public transport do not provide a practical way for many people to get to work. Henley itself provides few employment opportunities except in retail and hospitality so people have to commute to towns such as Reading, Slough, Maidenhead, Bracknell, etc to work. Often jobs are in industrial parks and not in town centres.</p>		<p>This is in line with the OCC Local Transport Plan 2011 – 2031 which has three main components:</p> <ul style="list-style-type: none"> • A better, faster and more comprehensive public transport network. • A complete, high-quality, spacious walking and cycling network. • Reclaiming some of the road space currently used for vehicles to provide more space for buses, pedestrians and cyclists.

			You cannot expect people to at least triple the length of their journey to work on top of working an 8-10 hour day.		
		Policy ENV4	You have missed the copse between 53-58 Blandy Road that was donated to the residents of the town.		This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.
		Policy H2	Affordable Housing p50 - there needs to be ways of providing more affordable housing and at a lower cost than £250k. There should also be more emphasis on affordable owned rather than rented housing.		Where affordable housing is required, 15% of the affordable housing will be required to be housing provided for sale in line with the definition provided in the NPPF.
		Policy T1	<p>There is far too much reliance on cycling, walking and public transport in this neighbourhood plan. The policy needs to include plans for dealing with increased cars and HGVs.</p> <p>Congestion is already at unacceptable levels so coordinated plans with Berkshire & Buckinghamshire councils need to be developed and at long last a new bridge needs to be built across the Thames in this area.</p>		<p>This is in line with the OCC Local Transport Plan 2011 – 2031. Furthermore, the Plan does include policies dealing with transport including Policy T1 Impact of development on transport network, T3 easing congestion, T4 EV Charging points and T6 parking.</p> <p>The NP supports the environmental weight limit (9.37).</p> <p>This is outside of the remit for the Neighbourhood Plan, it is considered in Local Plan Policy TRANS1b which states that SODC will work with OCC to plan improvements in the Reading area, including a proposal for a new River Thames crossing.</p>

		Policy T3	Easing congestion in Greys Road needs to also be supported by residents parking only and grass verges being changed into parking bays for residents. Greys Road is becoming a traffic nightmare like Remenham Hill as it can take 30mins at peak time to get through the lights to get through the town centre. I hate to think what this will be like if all the proposed developments on this side of town go ahead.		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
		Policy DS1	<p>There is far too much development being proposed on the area of town that uses Greys Road as its access point to the town centre (e.g. sites C, E, F, M1, X and Y).</p> <p>Developments need to be spread around town. Gillotts School should not be developed in order to allow for the necessary expansion that will be required as the population grows significantly with all these extra houses. Further developments at Highlands Farm should be required to be considered ignoring the recent developments for 20 years. It is completely unacceptable to let the current developments be allowed to enable this area to be</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM. AECOM have assessed site DS7 and consider this to be suitable.</p>

			<p>immediately considered as a built-up area thus enabling the housing to keep growing in size with no consideration to the green land that it was until only recently. It would very negatively impact the beauty of the countryside to bring this development closer to the road and town.</p>		
48	M Hails	Policy DS3	<p>There are a number of rumours referring to this site. Please clarify:</p> <p>(a) the School says the field is not used for sports, yet, as near neighbours we see and hear the field being used;</p> <p>(b) it is said that the proposed developers have bought a house next to the copse to be demolished and used as access, yet the plan says the copse will be the access route;</p> <p>(c) the copse is said to be owned by HTC, but we have been told by councillors that it has been given to the School;</p> <p>(d) another rumour says that there is a covenant prohibiting the use of the copse for building or any other use. I feel that this site should not be used for housing because (a) it is a valuable sports area; (b) Blandy Road is a residential road, used by students</p>		<p>Questions have been noted, we have been contacted directly to answer these questions where appropriate.</p> <p>Furthermore, Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p>

			going to and from Gillott's School at the beginning and end of the school day and the only access to the site will be to and from this road adding much more traffic, and is quite close to a bend which would make it a safety hazard; (c) it is also well used by learner drivers, so any increase in traffic density will add to the safety hazard; (d) any access road will cross the bridleway which has recently been upgraded and is very well used by residents and school children.		
49	G Timbers	Section 6 - environment	Should all new building incorporate a requirement for solar / charging points / air source heating systems?		Local Plan Policy DES10 requires new residential dwellings (and other development) to achieve at least 40% reduction in carbon emissions compared with a code 2013 Building Regulations compliant base case. This reduction is to be secured through renewable energy and other low carbon technologies and/ or energy efficiency measures. This is also covered by Policy SD1b and T4 in this Plan.
		Section 7 - Housing	Social housing needs to be affordable rather than 80% of the prevailing Henley market.		The NPPF definition of affordable housing is the accepted definition in planning policy and development management decision-making.
		Section 9 - Transport	Transport & Parking - the station car park needs to be retained or possibly decked to provide more parking given the network rail estimates of 99% growth in traffic.	Proposed changes to the wording of this policy.	Proposed changes to the wording of this policy to require development on existing public car parks to demonstrate that the overall number of car parking spaces available to the public and their ease of use is adequate to meet the needs of the railway station.

50	S Edwards	General comment	<p>This is a wide reaching, optimistic, aspirational plan. I would like to see more specificity, examples of how the policies might be achieved and essentially some target times.</p> <p>It isn't clear to me which aspects of the plan are within the control of the two local parish and town council. Which, if any of the policies are enforceable?</p>		<p>When the Plan is adopted, it will form part of the statutory Development Plan for the area, alongside the South Oxfordshire Local Plan. South Oxfordshire District Council will continue to be responsible for determining planning applications, but the policies in the Neighbourhood Plan will form the basis for those decisions.</p>
		Para 3.21	<p>Under provision of affordable housing '40% affordable rented; 35% social rented; 25% other'. What [does the other] 'other' [refer to]?</p>		<p>This is defined by the NPPF: Other affordable routes to home ownership is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p>
		Para 3.25	<p>Under Retail and Town Centre: 'need for more retail space' - additional 1,500sqm floor space. Really despite number of empty</p>		<p>Yes, this a requirement of the Local Plan (Policy TC1) for single storey food store.</p>

			units, 5 still empty in Gardiner Place?		
		Policy ENV2	The ambition to link green space and create green corridors - what are these are how would they be achieved? What is the time-frame?		In order to maximize biodiversity, it is necessary to make the most of opportunities with new development, also to link to Policy EN3 Trees and ENV4: Local Green Space.
		Para 5.19	'Local species will be encouraged.' How?		Policy ENV2 Biodiversity seeks to maintain and enhance the ecological value by encouraging development that identifies local biodiversity and incorporates features to attract wildlife and incorporates sustainable planting in keeping with the character of the local area.
		Policy ENV3	Trees replacement 'when necessary'. How is the necessity judged? In the same space or just the number lost replaced by any variety somewhere within the Henley area? It would be more impressive if the trees are replaced in situ unless there are firm arguments against. Replacement should have a realistic yet firm time frame. For example, the 2 lime trees on Gravel Hill have not been replaced nor have any new trees been planted in the small HTC space on Gravel Hill. Are all new house being built with at least 3 trees? It's not obvious as one walks around but a lot of trees have disappeared over the last 20 years.		This wording is not included within Policy ENV3. Noted, this is currently not a requirement of national and local policy and therefore consider it necessary to include a locally specific policy for trees in this Plan. Any proposals that affect existing trees would need to comply with this policy.

			Is this a hope or will it be part of planning requirements?		
		Policy T3	There's also bad congestion on Reading Road entering Henley; also especially bad and during 'rush hour' on Greys Road where the traffic often stretches up beyond the junction with Deanfield Ave. This is likely to increase significantly as more houses are built at the Highland development and there is little room for road improvement. I am surprised this is not at least acknowledged in the plan.		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
		Para 9.42	Provision of electric charge points for new house where suitable. How is suitability judged? Why not ensure that all new households have access to a charge point? For example, providing all lighting columns with charge points? Is this covered as part of planning permission?		Noted, this will be in accordance with the Oxfordshire Electric Vehicle Infrastructure Strategy.
		General comment	Despite the above comments, I would like to thank all those who have obviously put in a great deal of work to create the plan.		Noted.
51	P Hails	Policy DS3	Access to Blandy Road is not a good idea. Blandy Road is quite narrow, and is also a bus route. When cars and vans are parked on both sides, there are often problems. It is used by learner		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on

			<p>drivers and runners training. There is quite enough traffic on this road already. Because there is a bend very near the copse, this hinders visibility for vehicles travelling west.</p> <p>There is a history of flooding in the road when there is heavy rain, in front of houses 40 and 42, where there is a dip in the road, so much so that the road turns into a river. The water can cover the pavements and flow down our drives into our garages. After many discussions with SODC, the soakaway which they had placed in the copse, was replaced by a much larger and a more efficient one. I was assured that the underground earth etc belonged to SODC.</p> <p>A road through the copse would stop the soakaway working. The new porous bridleway has cost a lot of money and has proved very popular with the community. It is an ancient track, and should be revered as such, not by having a road put through it, which will make crossing it dangerous to pedestrians and cyclists.</p>		<p>highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p>
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			<p>School sports fields should be used for school sports. With more pupils coming to the school from these proposed new homes, and also from the expanding Highlands Park development, the school is going to need all the sports fields they already have. A road will have a detrimental effect on the wildlife found in this area - foxes, rabbits, muntjac, amongst others, to say nothing of the wildflowers.</p> <p>Lastly, I don't understand d) 'minimises impact on the copse area'. Does this mean that the proposed road will go through the copse with little interference to the trees? If so. I'd like to see it!</p>		
52	J and S Hutchinson	Policy DS3	<p>I'm very much against the idea of building on this field, which is a precious resource and in constant use despite the Head of Gillott's assurances to the contrary.</p> <p>The mass concreting over of green spaces in Oxfordshire has become an extremely hot political issue, with locals up in arms everywhere.</p> <p>In Henley itself, over 2,300 people recently signed an online petition</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p> <p>A response to the petition is also included within this Consultation Statement.</p>

			<p>against building on this site in particular - which, to put it in context, is a quarter of the adult voting population!</p> <p>In addition, the extremely rapid expansion of housing in Henley over the last five years has surely already resulted in our meeting our housing quotas? (Not many people buy the 'affordable housing' line: affordable to whom?!) Certainly, the daily 9am traffic congestion along the Reading Road would suggest so.</p> <p>The government has apparently now ordered a complete rethink of the Planning Bill - https://www.thetimes.co.uk/article/planning-reforms-will-ban-ugly-new-builds-gmvl6t8db - so I'm not sure why Henley, Harpsden and the SODC are still insisting on pushing through development proposals at this stage?</p>		<p>There is a requirement to go above the housing requirement in Policy H3 of the Local Plan which states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. The 2020 Housing Needs Assessment demonstrates that there is a need for affordable housing in Henley and Harpsden. National policy sets the definition of affordable housing.</p> <p>Furthermore, The Neighbourhood Plan must have adequately progressed with allocating sites to meet the requirements set out in Local Plan within 12 months of adoption of the Local Plan (by 09.12.21), otherwise planning applications for housing in Henley and Harpsden will be supported provided that proposals comply with the remainder of the policies in the Local Plan.</p>
53	G McBride	Policy DS1 Policy DS3	<p>I am strongly opposed to this allocated development for the following reasons:</p> <p>1.Allocation should never have been included in the original plan as it was voted down by 53% to 40% in a previous application.</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site</p>

			<p>2.It serves no benefit to the town and the new facilities are 'a nice to have' rather than essential.</p> <p>3.It is a green field site and therefore any development is in direct contravention of Government policy.</p> <p>4.The spinney between the bridle path and Blandy Road was given to the Town Council by the Developers, with codicils to protect it from development, and shouldn't be used for access.</p> <p>5.Any access from Blandy Road would entail crossing a Bridle Path.</p> <p>6.The field is usable for sporting and recreational activities.</p> <p>7.Any sale won't solve the school's ongoing financial situation</p> <p>8.The 50 houses are not essential to meeting the plan, which could be fulfilled by taking into account infill housing.</p> <p>9.Diverse wildlife will be adversely affected</p> <p>10.Future generations of schoolchildren will be denied the benefits of a beautiful, peaceful countryside environment as apart from a housing estate.</p> <p>11.Greys and St Andrews roads are already very heavily used.</p>		<p>along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p> <p>OCC will consider the access as a planning application stage.</p> <p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>
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54	J Brookes	General comment	Lots of excellent work especially on environmental and sustainability issues.		Noted.
		Policy DS3	I believe that due to the lack of progress in the last 5 years, that this site is undeliverable and should therefore be deleted. Furthermore, it is not as suitable as Policy DS6 Site M1.		The site promoter has confirmed that this site is deliverable within the Plan Period.
		Policy SCI1	It is not up to the Neighbourhood Plan to provide for the funding of the essential development of Gillotts School. This does not preclude Henley Town Council supporting the school in its fund-raising efforts. Consequently, policy SCI1 needs to be deleted.		This is a saved policy taken from the existing JHHNP and therefore has already been accepted through examination.
		Policy DS7	Whilst this site is in the Chilterns AONB, it offers many other significant benefits as summarised in paras b), d) & e) especially the latter. See Policy H2 [comments] below.		Noted.
		Policy DS8	Site U was the Wilkins site. Does this reference need to be deleted?	Remove reference to Site U.	Agreed.
		Policy H2	The percentage of social housing in the affordable housing allocation should be at the maximum possible and that it be let at a maximum of 60% of local commercial lets. Only affordable		Noted, the percentage for social housing is set by SODC.

			housing should be available for sale. Setting up a CLT as provided in Policy DS7, Site M1, could be used to build both affordable and social housing.		
		Policy H1	Add paragraph IX to state that all new build should have solar panels.		This would be covered by policy DES8 and 10 in the Local Plan and policies SD1a and b in this Plan.
		Policy T5	Para A - this should be amended to say specifically that the station carpark should be retained for parking for commuters and visitors to the town. Para 9.64 also refers.		Car parking is covered by policy T6: Parking and Standards.
		Policy T3	I believe that the suggestion in 9.39b. "Reducing to one lane the traffic approaching the junction from the bridge on Hart Street" will have the opposite effect and result in an even worse build up in Hart St and White Hill.		Noted, the first step would be to carry out modelling on the suggestions that have arisen from discussions of the Transport Strategy Group and traffic modelling consultants. This would show the impact of the possible alterations for congestion.
		Policy T4	Para A - in first line, delete "where practicable" in the first line. Para D. Is this providing developers with a loophole? Policy T4: Para F. NPA? Neighbourhood Plan Area? Item for the glossary?		Noted, would still need to be in accordance with the Oxfordshire Electric Vehicle Infrastructure Strategy. NPA is already included within the glossary.
		Policy T6	Para A - is this strong enough to ensure that all developments, especially downtown apartments have parking provision on site and not rely on parking permits from		This policy has been drafted in line with comments received from OCC. They have advised that we cannot seek car parking standards above those already required by OCC.

			OCC for which I read somewhere (in this document?) that there are 500 permits for 350 spaces? Para D - I did not find a policy map which marked the car parks to ensure that the station car park is included.		
		Para 6.2	"Lack" should be "lag"?	Change to "lag".	Agreed.
		Para 6.18d	Should be "e.g."?	Add "e.g."	Agreed.
		Para 9.5	Middle line, there appears to be a word missing?	Add "by" and "who"	Agreed.
55	C Notaras	Policy DS7	<p>1.Highlands Farm 2 is significant Field of Agricultural Land. This farmers' field has great ecological and environmental value and should NOT be granted CHANGE OF LAND USE but be protected from building developments.</p> <p>2.Highlands Farm is in an area of Historic, Scientific and Geological Interest and therefore this field must be protected and remain as it is.</p> <p>3.This site is a valuable resource, it provides a large area of Co2 sequestration and carbon capture. Tonnes of Co2 should continue to be captured here for future generations.</p> <p>4.When confronted with global warming and climate change it becomes unacceptable to destroy</p>		<p>Landscape considerations including the potential impact of development on the landscape and the AONB have been considered in site selection process in line with the Local Plan and NPPF. The Baseline Report published with this consultation provides details on the methodology and the results of each site assessment. Furthermore, the effect on the environment would be moderated by a number of requirements listed in the policy. A Design Brief would be required to incorporate and reinforce existing landscaping, green infrastructure and biodiversity features and a Landscape and Visual Impact Assessment would also be required. With regards to the NPPF Paragraph 177, it is demonstrated through the 2020 Housing Needs Assessment that there is considerable need for affordable housing in the Neighbourhood Area, this is considered to constitute an exceptional circumstance and this would be in the public benefit. Local Plan policy</p>

			<p>land that can provide fresh water capture and in addition the well-rested soil can grow crops to supply the town with locally produced food.</p> <p>5.This Greenfield site has in 20 years developed into a rich biodiverse wildlife habitat. It provides an ecosystem and refuge for many species - some of them endangered.</p> <p>6.The proposed development at Highlands Farm 2 is over intensive and is a biased burden on the North of Henley.</p> <p>7.The surrounding roads are unsuitable to support more traffic.</p> <p>8.This site already captures 'run off from the Highlands Park development Further urbanisation will increase localised flooding and sewage overspill into the Thames.</p> <p>9.The proposed site is in the AONB and contributes to a seamless rural corridor that connects the surrounding Parishes of Harpsden, Rotherfield Greys, Shiplake and Rotherfield Peppard. This site has been a popular recreation area enjoyed over many years by Henley residents and visitors.</p> <p>10.This site is at present used to mitigate the impact of Highlands Farm 1 on the AONB, it should not</p>	<p>H3 states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d. The site would also bring forward other public benefit including social benefit through community led housing and the relocation of the Chiltern Centre and economic benefit through 1h of employment land.</p> <p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Comments received from OCC Archaeology team have been considered when drafting the policy wording.</p> <p>Thames water have been consulted and will consider impact on the sewers.</p>
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			<p>contribute to more urban sprawl and further damage to the environment. It needs to be conserved as a green space with all its ecological and environmental benefits.</p> <p>11.The development will not bring greater wealth to Henley, it will diminish the accessible recreation and eco-tourism opportunities that attracts visitors and brings wealth to this Historic Market Town.</p> <p>12.The housing quota has already been met through infill developments over the last 15 years.</p> <p>13.Vacant offices together with Brown and Greyfield sites are available for development in Henley where one and two bedroom flats can be built alongside small business units. In addition, 'Social Rental' and 'Affordable Housing' can be accommodated on alternative sites that have already been earmarked for development.</p> <p>14.All Greenfield sites in Henley should be conserved. Henley has already less green space per resident than advised by SODC.</p>		<p>There is a requirement to go above the housing requirement in Policy H3 of the Local Plan which states that Neighbourhood Development Plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision</p>
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					in excess of the outstanding requirement shown in Table 4d. The 2020 Housing Needs Assessment demonstrates that there is a need for affordable housing in Henley and Harpsden. Sites promoted through the call for sites that have been assessed to be suitable, available and deliverable have been proposed for allocation.
56	G Lockett	Vision and objectives	Whilst I accept that Henley is short of Social and Affordable housing and this needs addressing, I am of the opinion that via the JHHNP Henley is being asked to provide a total number of homes beyond local need. The town cannot sustain more homes and people. The roads are blocked all too often, the Doctor's Surgeries full to capacity and off-road parking totally inadequate. More homes will only exacerbate these issues.		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The Bell and the Hart surgery were visited and sent a questionnaire and both reported that they welcome new patients. The Bell Surgery's current list is 8,633 and their maximum list is 10,500. They have already responded to a capacity survey by the CCG in 2017 that they would be happy to recruit another GP if the additional patient numbers allowed for the funding of a full or part time GP. Surgeries have confirmed there is future capacity available. Policy T6: Parking and Standards considers the parking provision for the town.
		Policy DS3	With regards to individual sites, I deplore the sale of the sports field at Gillott's School. Our children should not be deprived of outside sporting facilities, particularly in this age of increasing obesity among the young. This site should		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site

			not be a part of any plans for future development.		along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.
57	R Chandler White	Policy DS1	<p>The plan allocates an extra 145 units over the existing plan, the majority of which are in the front field at Highlands Farm. This will result in significant development along the Greys Road approach into Henley. The 'top shops' development, Gillotts School, a very large combined development at Highlands Farm and Chilterns End will all contribute traffic to a road that is narrow and where passing is often difficult particularly closer into town due to parked cars. Air quality is very poor at the traffic lights at the end of Greys Road.</p> <p>Whilst I appreciate that the decisions to be made are the 'least worst', having this level of development at one end of town should preclude any more large sites being accepted for development on the West side of town.</p>		OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
58	S Bagshawe	Policy ENV4/	I would like to register my confusion/concern of the designation of "Sarah's Wood" as	Remove as Local	Accepted.

		<p>pp. 30-31 Baseline Report</p>	<p>a designated Green Space. As the landowner I do not understand how my house and garden has ended up being proposed as such!</p> <p>Most of the site is taken up with the house itself and outbuildings, driveway, cultivated residential garden with large lawned areas, flower beds and an allotment area - which we are hoping to expand. In the short to medium term, we also plan to bring our 2 horses home to live out their retirement – they will need access to grazing and we would hope to be able to erect a wooden shelter with small hay barn for them.</p> <p>The garden boundary has a number of mature trees - mainly horse chestnut (sadly blighted by the Horse Chestnut Leaf Miner). This narrow belt of trees is subject to a TPO and so is protected. Much of undergrowth is of poor ecological value as ivy has taken a stranglehold. There is also a small area of Elm trees which will never mature due to Dutch Elm disease.</p> <p>Clearly my garden has been proposed as being of particular importance to the local</p>	<p>Green Space.</p>	
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			<p>community, (i.e. someone has nominated it) but, as clearly stated in Government guidelines, designation should only be used where the following criteria can be demonstrated: - where the Green Space is in close proximity to the community it serves - - where the green space is demonstrably special to the local community and holds particular significance because of its beauty, historical significance, recreational value, tranquility and richness of wildlife.</p> <p>Using these and the other criteria by which sites were assessed for suitability it is difficult to see how my garden became designated; arguably failing on all the criteria, as: it does not have public access; it does not offer public recreation; it is not especially tranquil (as, apart from being a residential home, it is close to Valley Road, a well-used footpath and the nearby primary school,); it has no historical significance, and; it does not have significantly rich wildlife or have high ecological value.</p> <p>The majority of the land is either built on or formal garden with an</p>		
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			<p>allotment. It doesn't enjoy particularly impressive biodiversity; the mammalian wildlife is pretty much restricted to grey squirrels, rabbits & Muntjac deer – none of which are valued indigenous species. The garden does attract bird visitors, but not, I would argue, of sufficient significance to warrant special designation. The ecological value of even the more natural parts of the garden, is not as great as it might be as unfortunately ivy has taken a stranglehold in the undergrowth areas.</p> <p>I can understand that the residents whose houses that overlook my garden would be keen to ensure that the land is never built on; spoiling their views (and this may have been the motivation behind this nomination), but I have absolutely no plans to do so and indeed it would not be possible as the main SE gas pipeline runs under the site and there is a covenant in place preventing development. In addition, as already mentioned, the belt of mature trees on the boundary is fully protected.</p>		
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			In light of the above, I would respectively request that “Sarah’s Wood” be removed from your list of designated Green Spaces.		
59	T Howell	General comment	It is not clear whether the identities of those commenting will be made public along with their responses. Some individuals might feel inhibited by this because they might have good reason for not wishing their views to be read by certain parties. Will you please clarify this?		Comments received by individuals will be published in a consultation report, alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details.
		Policy SC11/ Policy DS3	The continuing inclusion of the Gillotts School playing fields is an affront to local democracy: 1. In the run-up to the 2016 Neighbourhood Plan referendum, in the very first public consultation, Gillott’s was voted the second least popular site, yet remained on the initial site list. Lucy’s farm came bottom of the list and was eventually excluded. 2. In the school’s own June 2014 consultation, local residents voted against the inclusion of the site by 53% to 47%, but votes from other stakeholders, including parents and school governors, were used to achieve an overall YES vote. The consultation was not carried out		Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM. Site 1126 Lucy’s Farm was assessed by independent professional consultants AECOM and deemed to be unsuitable. The assessment found that the site would not be suitable for allocation in the Neighbourhood Plan as it does not meet local policy. The site is adjacent rather than within the built - up area. There are also a number of other constraints that impact the sites

			<p>by an independent body and respondents had to provide their names and addresses. This meant that any teacher or employee at the school who might have been against the proposal was unable to express their view freely without fear of reprisals. The consultation should therefore have been deemed invalid at that juncture, but the Secretary of State for Education's department accepted the result without question and proceeded to give permission to sell the land.</p> <p>3. In the final public consultation in early 2015 on the pre-submission draft of the NP, just 41% of responses supported the Gillott's site, while 52% did not. Perversely, in a subsequent public meeting, the consultants Nexus decided, despite being challenged, to ignore the public's position because the margins were "not big enough to justify changing the plan". Yet the whole of the NP could be passed by a simple 51% majority.</p> <p>By dint of its previous inclusion in the 2016 Neighbourhood Plan, the Gillott's site cannot apparently be removed from the 2021 plan. Yet, this time round, some 2000</p>		<p>suitability including access and potential risk of coalescence between Henley and Harpsden. A primary objective is to ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other.</p>
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			<p>individuals have signed a petition against the site. The response to this by the Henley & Harpsden NP Committee was “You can’t please everyone”.</p> <p>Surely, a fundamental tenet, and the whole point, of neighbourhood planning is that it should reflect the wishes of local people. Our views must therefore be respected, otherwise it is an affront to democracy. In fact, this time round, local residents have not even been given the opportunity to vote on the individual candidate sites, presumably because it would then be obvious that a large section of the electorate of people opposes the inclusion of Gillott’s and such numbers would be difficult to ignore.</p> <p>Many local people are also against the development of the adjacent site, Lucy’s Farm, by Bloor Homes, as are Henley Town Council’s own commissioned consultants, Aecom, and the NP Committee. The Aecom report was cited as one reason for its exclusion from the plan.</p> <p>However, if one fast-forwards to a hypothetical future when the Gillott’s site is eventually</p>		
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			<p>developed, one doesn't require the wisdom of Solomon to predict that the development will be used as leverage to gain approval for building on Lucy's Farm at a future date. Otherwise, why would Bloor Homes, who admit to there being "marriage value" between the two sites, continue to retain ownership of 55 Blandy Road, adjacent to the cut, giving them a guaranteed access road alternative?</p> <p>So campaigners against the development of Lucy's Farm risk major disappointment in a few years' time and will wonder why. Simply put, allowing Gillott's to be developed for housing is a naïve 'own goal' for those who have chosen to ignore the wishes of Henley residents, because a vote for Gillott's is a sure-fire vote for Lucy's Farm.</p>		
60	A Del Nevo	Policy DS7	<p>I am very concerned about the size of site M1. When we put together the original Neighbourhood plan, it was felt that 200 new dwellings was the absolute maximum for the Highlands Farm site. An extra 100 dwellings will put a massive strain on this side of the town and add significantly to traffic and parking problems.</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>

			<p>While the current new development at Highlands Farm is separated from the town, this new site will serve to join it up to the edge of the town, creating sprawl. My other concern is that this field would be put to such better use as a sports facility as it is so flat. Rather than trying to put a football field in the middle of the current new development, which I understand from people who are involved in sport is not practical, why not put the football field (in fact several football fields or other sports facilities) here? There would be space for a clubhouse, carparking, maybe a synthetic pitch, playground etc... a fantastic amenity for the town.</p>		<p>The site has been considered suitable by consultants AECOM for a mixed use scheme. This site was not put forward for consideration of a sports facility.</p>
61	A Jeremy	Policy DS1/ Policy DS3	<p>I strongly object to the development of Site C (Gillott's School playing field).</p> <p>This is an area of outstanding natural beauty - I am against the development of any greenfield site before all other alternatives, including existing brownfield sites, have been exhausted (Engbers?).</p>		<p>The site does not fall within the currently designated area of outstanding natural beauty.</p> <p>An outline application for this site has been approved so the principle of development on this site has already been established and therefore would not need to be allocated in this Plan.</p>

			<p>In addition, the sale of a school playing field just seems morally wrong - especially when it is envisaged that the town will grow. The secondary school will need to expand to accommodate the extra population. Once they have sold their land to be built on, there is no going back - that beautiful space can never be reclaimed.</p> <p>It would also appear that development of site C goes against some of the NP objectives, in particular E02 and E03 on page 27 – para 5:16 mentions “conserving and enhancing the natural environment.”</p> <p>Page 32 - why is the copse between 53 and 59 Blandy Road not designated as a Local Green Space?</p> <p>Page 29: 5:22 “All woodland should be given some form of protection.” As the copse appears to be the only entrance and exit to any Gillotts field development, this woodland would be lost.</p> <p>The entry on page 78 “d. Minimises the impact to the copse</p>		<p>Site DS3 Gillotts School Field is currently allocated in the Neighbourhood Plan for residential use, this has been through the consultation and examination process with the current Plan and was determined an appropriate allocation. The revised Plan is not proposing to make any changes to the allocation. This site along with the rest have been put through a robust site assessment process and this site was deemed suitable for residential development by independent professional consultants AECOM.</p> <p>This site was assessed against the Local Green Space Methodology and was ruled out. The Belt contains mature trees which are covered by a Tree Preservation Order. The belt of trees are not a Priority habitat and therefore do not warrant designation for Local Green Space.</p>
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			<p>area” would appear to be an unattainable target.</p> <p>I also think that development of Gillott’s field would create overdevelopment on the Western side of the town with added pressure on the existing infrastructure. In particular, the Highlands Farm development together with the proposed extra building on site M1 (northern field at Highlands Farm) has created greatly increased traffic flows on both Greys Road and St Andrew’s Road with the associated increase in noise and air pollution and a reduction in air quality. Another 50 homes (with potentially 50-100 cars) at Gillott’s would make this situation much worse.</p> <p>The most glaring omission seems to be the non-development of the former garden centre called Engbers. This is already a brownfield site (it currently is a wasteland) and has good access to Reading Road. Any road traffic exiting the site has the choice of turning north for Henley or south for Reading. Commuters would have easy access to the frequent bus services along the Reading</p>		<p>OCC as the Highway Authority have considered the site and have made no objections. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>An outline application for this site has been approved so the principle of development on this site has already been established and therefore would not need to be allocated in this Plan.</p>
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			Road or use the train from either Henley or Shiplake.		
62	D McEwen	General comment – transport policies	<p>Transport Policies and the Climate Emergency. Too much emphasis is being put on facilitating the wholesale switch to electric cars. This is not a silver bullet for climate change mitigation. It needs to be recognised that the emission savings are over the lifetime of the vehicle. There will be an increase in production emissions for electric cars over petrol & diesel cars.</p> <p>So we also need to try to drastically reduce the number of car journeys by promoting active travel and sharing transportation.</p>		Noted, this is the purpose of policy T2 Active Travel, T3 Easing Congestion and T5 Public Transport.
		Policy T4	<p>There is no mention in the policy of charging points for car club cars which should be a priority for the town for the following reasons: 1.9.47 states that 30% of homes in Henley are without off-Street parking. Residents in these homes are one of the key targets for car club membership. A car club allows residents to efficiently share cars and helps address the off-street parking issue</p>		This is supported as a priority project listed in Appendix A which is referred to in Policy T2: Active Travel.

			<p>2.Co-Wheels, who operate the Henley Car Club, say that on average each car club car will be supporting 35 residents in using an electric car</p> <p>3.recent research estimates that 18.5 individually owned cars are taken off the road for each car club vehicle</p> <p>https://como.org.uk/wp-content/uploads/2021/06/CoMoUK-Great-Britain-Car-Club-Summary-Report-2020.pdf This could make a significant reduction in the town’s carbon footprint mentioned at 9.45 and 9.46</p>		
		Policy T6	The reduction in car ownership mentioned above would help with the pressure on residents parking spaces in the centre of the town.		Agreed.
		Policy T3/ Policy T5	The policies are too limited in scope to seriously address the problems of congestion in Henley. As well as encouraging active travel there needs to be greater recognition of the role that can be played by sharing transportation in general; public transport, liftshare arrangements and car clubs. Connectivity with surrounding towns and villages is poor, apart from the train service to Twyford and on towards London and		The Neighbourhood Plan supports these projects (Appendix A) and CIL monies can be used to support this. The Town Council also have a Transport Strategy Group looking at this.

			<p>Reading, and the bus service along the High Wycombe, Henley, Reading axis.</p> <p>The best way for Henley to address the congestion problems would be to develop a comprehensive Travel Plan for the town engaging with major employers, schools and Henley College as well as town and parish councils in the surrounding area. Much is being done already. Individual enlightened employers such as Invesco already have a travel plan for their employees which involves a liftshare scheme and running coaches at the beginning and end of the day. Henley College students attend from all over the area and the College runs coaches to enable many of them to attend without using a private car. Often parents of children at a particular school will set up a What's App group to facilitate liftshare arrangements if the school doesn't do the enabling. It needs the vision in the Neighbourhood plan to build on these existing arrangements.</p>		
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Consultation responses received via online survey

- **Numbers leaving contact details and a comment: 58**
- Numbers leaving their contact details but not making a comment: 44
- Numbers not leaving their contact details but making a comment: 1
- Numbers leaving contact details but an unintelligible comment: 1
- Numbers leaving no name and no comment: 3

Received received via letter/ email

- **Numbers leaving contact details and a comment: 4**

REGULATION 14 CONSULTATION HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

NOVEMBER 2021

Appendix A: REPRESENTATION REGARDING LAND NORTH OF 5 PARKSIDE, HENLEY-ON- THAMES



Woolf Bond Planning
Chartered Town Planning Consultants

Our Ref: DB/GR/6671

11th November 2021

New Joint Henley and Harpsden Neighbourhood Plan (2020-2035)
Henley Town Council
Town Hall
Market Place
Henley-on-Thames
RG9 2AQ

Sent in electronic format only via enquiries@henleytowncouncil.gov.uk

Dear Sir/Madam

CONSULTATION ON THE DRAFT JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN 2020-2035

LAND NORTH OF 5 PARKSIDE, HENLEY-ON-THAMES

On behalf of my client, Mr T Bingham, I am writing to provide representations on the draft Neighbourhood Plan.

My client controls land to the north of 5 Parkside, Henley on Thames, RG9 1TX extending to approximately 0.7ha. The site was included as an allocation in the Pre-Submission Draft Neighbourhood Plan consulted upon in June 2014. It is understood that this proposal attracted 70% support during the public consultation exercise. Despite this it was subsequently omitted from the Submitted and the approved Neighbourhood Plan with alternative sites allocated. Through the consultation on the Draft Neighbourhood Plan, the site has been omitted as a housing allocation and is envisaged as a Local Green Space site (in draft Policy ENV4). For the reasons detailed in this submission, the Local Green Space designation should be removed from the site, and it included as an allocation for residential development.

This therefore contributes towards replacing the unjustified allocations in the Plan, particularly that at Highlands Farm (entailing major development on a green field site

within the Chilterns AONB) contrary to both the NPPF (paragraphs 176 & 177) and the South Oxfordshire Local Plan (policies STRAT1 and ENV1).

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The attached location plan shows the extent of the site and immediate context of the surrounding area. The site is considered to be appropriate for residential development for at least 8 dwellings and provides a genuinely viable and deliverable development opportunity.

At the outset I object to the amendments made to the Neighbourhood Plan (NP). For the reasons set out in the submissions below, I consider Land North of 5 Parkside (Site 988 in Site Assessment Report) should be included as an allocation for at least 8 dwellings. Furthermore, for the reasons detailed in this Statement, the following draft allocations should be omitted from the Plan, with replacement sites identified (including land north of Parkside) to ensure sufficient homes are provided in the Neighbourhood Plan area.

- i) Policy DS7 - Highlands Farm (site M1) for around 110 dwellings, 1 ha of employment and relocation of Chilterns Centre;
- ii) Policy DS3 - land Gillotts School (Site C)) for around 50 dwellings; and
- iii) Policy DS9 - Chilterns Centre (site Y) for around 3 homes.

Furthermore, the land north of Parkside (parcel ref 23) should be omitted from the list of Local Green Spaces listed in policy ENV4 as the evidence does not demonstrate that it accords with the criteria for definition, especially as the enclosed ecology survey indicates that it has no significant value, notwithstanding it is a potential priority habitat.

The submission is supported by the following documents:

1. Location Plan;
2. Ecology Letter of 3rd June 2020 by Aae Environmental Consultants;
3. Agenda from 1st March 2021 Neighbourhood Plan Committee meeting;
4. Agenda from 14th June 2021 Neighbourhood Plan Committee meeting
5. Examiners Report on Henely and Harpsden Neighbourhood Plan (November 2015); and
6. Proposed site plan showing erection of 8 apartments on land north of Parkside (ref 5568-102) (colour)

The purpose of these representations is to respond specifically to matters underpinning the exclusion of our client's land from the Neighbourhood Plan and highlight where the Neighbourhood Plan as drafted fails to meet the Basic Conditions.

Objection to draft policy ENV4, together with the inclusion of Parkside Wood

The Pre-Submission Draft Neighbourhood Plan in paragraph 5.27 details the requirements that have to be achieved for it to be considered as Local Green Space within draft policy ENV4. The criteria listed replicates that in paragraph 102 of the NPPF. This is clear that:

The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;

- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and**
- c) local in character and is not an extensive tract of land.**

The Neighbourhood Plan Groups assessment of the various sites have regard to these criteria are outlined on pages 25 to 31 of Topic Paper 1 “Environmental Sustainability and Climate Change” within the Baseline Report. The assessment of the various locations considered is detailed in the Table on pages 26 to 31 and indicates how the various potential sites have been assessed against the following criteria:

Publicly accessible, Subject to other designations, and demonstrably special to the community with regards to: History, recreation, tranquillity or wildlife.

The land at Parkside is assessed under reference no. 23 is considered suitable for designation by virtue of quality of the wildlife on the site. However, the topic paper provides no information of how any of the sites have been assessed with respect of both proximity to the community together with local in character. Consequently, it is not considered that there is sufficient evidence with the Draft Submission Plan to confirm how the Parkside site (ref no. 23), together with the others provisional shown comply with the other obligated elements in paragraph 102 of the NPPF.

The Neighbourhood Plan’s assessment criteria (as noted above) also indicates that a key factor is whether the site is subject to other designations. However, the nature of these “other designations” is not defined in the topic paper and consequently there is no opportunity to comment on whether the assessment of potential local green space sites is robust.

On the basis of these factors, all the potential local green space sites together with policy ENV4 should be omitted from the Plan, prior to its submission for further consultation by South Oxfordshire District Council and its subsequently examination. This is because the Neighbourhood Plan is not supported by the necessary proportionate evidence to include this designation within the plan.

This view is taken as whilst it is acknowledged that the Neighbourhood Plan Committee (at their meeting on 1st March 2021) considered and agreed a methodology for evaluating potential Local Green Space sites (pages 21-39 of the agenda)), there is no indication whether this was subsequently refined through the subsequent assessment process and the results listed in the Topic Paper. Irrespective of whether the methodology has been unchanged, the failure to included it within the consultation documents has meant that residents and other interested parties have been disenfranchised from the process, especially why locations were initially discounted. It is clear that some locations were discounted as the Topic Paper with the

Draft Submission Plan includes non-sequential references and most importantly does not start at 1. This is therefore an illustration of how some sites were discounted but for non-disclosed reasons in the Topic Paper.

The methodology from the 1st March 2021 meeting suggests (page 30 of the agenda) at stage 2, that the following designations were relevant in discounting the consideration of sites as Local Green Space:

- Special Protection Area: protected under the EC Birds Directive (79/409/EEC);
- Special Areas of Conservation: protected under EC Habitats Directive (92/43/EEC), transposed into UK law by the 'Conservation of Habitats and Species regulations 2010';
- Sites of Special Scientific Interest: protected under Section 28 of the Wildlife and Countryside Act 1981
- Local Nature Reserve: protected by the National Parks and Access to the Countryside Act 1949;
- Registered town greens and common land: protected by the Commons Act 2006.

It is noted that there is no justification of why only these designations were relevant for discounting sites for designation as Local Green Space within the assessment, especially as paragraph 5.2 of the draft methodology also includes Green Belt as a designation relevant for excluding sites. It is noted that the NPPF refers to other designations such as those associated with heritage assets, ancient woodland and habitats which could also result in exclusion from assessment as a potential local green space, especially as it is not clear on the reasons why the five listed were chosen. In the absence of clear guidance on the listing of designations relevant for discounting as a local green space, this further illustrates the unjustified nature of the sites currently chosen, especially as at least three of the designations (Green Belt, Special Protection Area and Special Area of Conservation) do not apply to any land in the Joint Plan area.

The 1st March 2021 agenda also includes guidance on how proximity to the community together with whether a site is local in character could be appraised. Of relevance to the Parkside site which covers 0.7ha (as detailed above), is the suggestion that it could be regarded as close to the community, where they live within 300m of the site.

However, as Parkside Wood can only be accessed of a private road with no public access, it is not clear why it has been selected as a location for consideration, especially as the only community it could potentially serve are the residents of the 5 properties on Parkside. There are no others for whom the site can be regarded as being available to due to the restrictions on access to the site from a private road. It is not therefore considered that a parcel of land which would only be passed by the residents of the 5 dwellings on Parkside can be regarded as a community pursuant to paragraph 102 of

NPPF. Therefore, as the site has not been shown to be available to the community (as only accessed off a private road), it would not qualify as a Local Green Space.

The table on pages 32 and 33 of the 1st Committee Report details how sites would provisionally be appraised against the criteria. However, these factors are not listed in the Topic Paper which further illustrates that the approach is unjustified as there is no guidance on how the appraisal has been undertaken.

Pages 35 and 36 of the 1st March 2021 Committee Report list 34 potential locations for appraisal as local green space sites (Parkside Wood is included as no. 21 in this list).

The 14th June 2021 report to the Neighbourhood Plan Committee (pages 40 to 47) provides appraisals of the majority of the sites which had been included in the 34 potential locations in the 1st March Agenda. However, there is no assessment of the site with reference no. 1 – Chiltern Dipslope and Plateau (page 35) and why it was excluded.

For several sites in the appraisal for 14th June Committee, pages 40 to 42 indicates that some sites are excluded as they relate to extensive tracts of land. However, since no maps of any assessed location is provided, there is no indication that these rejected locations are unsuitable due to their size and consequently why those appraised further had potential.

With regard to Parkside, it states that “it is in reasonably close proximity to the community, is not an extensive track of land and does not benefit from other designations” (page 41 of 14th June Committee agenda). However, as explained, as the reasons why the “other designations” have been selected within the criteria is not confirmed in the appraised methodology (especially in the Topic Paper with the Pre-Submission Plan), for the reasons previously explained this conclusion is not justified. This includes no evidence of how it can be regarded as being in close proximity to the community when it could only be passed by the residents of the 5 dwellings on Parkside. It has not been justified how a group of 5 dwellings constitutes a community for the purposes of the NPPF and therefore Parkside Wood should be excluded on these grounds.

Nevertheless, the further assessment of Parkside is included on page 45 of the 14th June Committee Report. This is repeated in the Topic Paper on page 29, albeit with the confirmation that the site is subject to a TPO¹ which was omitted from the June Report included as appendix 4 of this submission. The full assessment of the Topic Paper is set out below:

¹ Whilst not relevant to the assessment

			Demonstrably special to the community with regards to:				NPPF criteria
23) Parkside Wood	H	H	H	H	H	H	<p>Parkside wood has particular local significance because of its richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland and is covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space. It provides a link between Friar Park and towards the woodland at Henley College creating nature corridors.</p> <p>Recommendation: Local Green Space</p>

The assessment indicates that the only reason why the site potentially qualifies as a Local Green Space is due to wildlife. The further analysis indicates that it has a “richness of wildlife”, although there is no evidence to substantiate this claim, beyond the statement that it is a Priority Habitat.

The ecology statement prepared by Aae Environmental for the site following surveys indicates that:

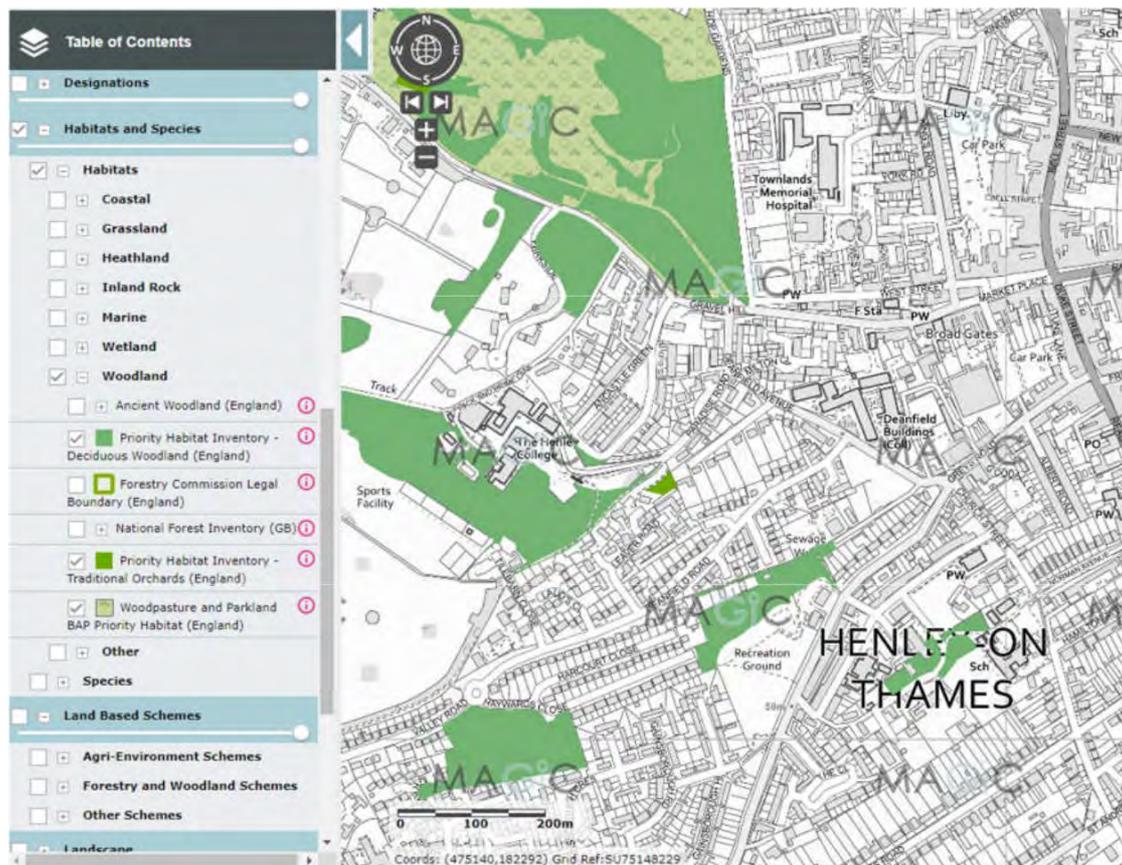
During the initial walk-over survey (29 July 2016), no evidence of protected species was recorded, with only a few disused mammal holes present. Although the shape was thought to indicate that these could have been originally excavated by badger, the condition and restricted size confirmed that none of the holes had been active for some time. No supplementary evidence of badgers was recorded despite a thorough search of the site.

According to the Multi-agency website, there are no ecological statutory designated sites located on or directly adjacent to the site. The nearest ecological statutory designated site is Lambridge Wood Site of Special Scientific Interest (SSSI), located approximately 1.3km to the north-west of the site. Other statutory designated sites within the 2km study are included Highlands Farm Pit SSSI, located 1.5km to the south-west, Temple Island Meadows SSSI, located 1.9km to the north-east and Harpsden Wood SSSI, located 1.9km to the south-south-east. The site is noted as Deciduous Woodland, a Habitat of Principal Importance (HPI).

TVERC held no records of protected or notable species on the site itself although there were a number of records within the study area. The closest non-statutory designated site was Hernes Local Wildlife Site located 0.41km to the west of the site.

This ecological report prepared in June 2020 indicates that there is no richness of wildlife on the site as suggested in the appraisal associated with the Neighbourhood Plan. Consequently, it is not considered that there has been justification for including the site as Local Green Space, notwithstanding the response which indicates that the whole policy approach is unjustified.

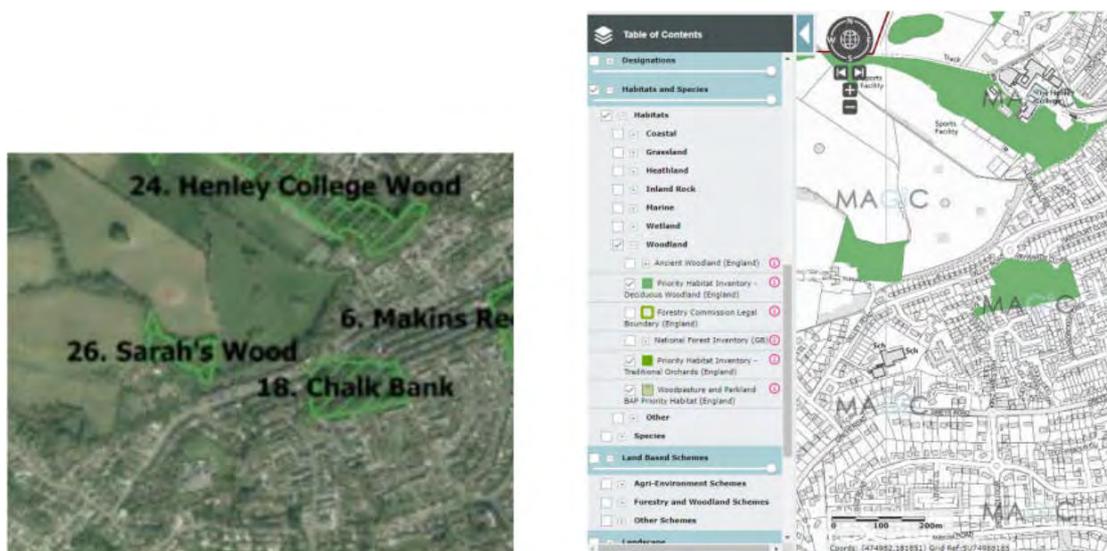
Whilst it is noted that Parkside is included as a Priority Habitat, this cannot be a justification for designation as local green space since other sites covered by the emerging Neighbourhood Plan have not been included, and the appraisal in the Topic Paper (or earlier Neighbourhood Plan Committee Agendas) does not explain why this has not occurred. This includes the priority habitats as indicated on the information from Magic maps.



The above extract indicates that there are priority habitats (Deciduous Woodland) to the north-west of Parkside and west of Trinity Church of England Primary School which are not listed for protection as Local Green Spaces. The same also applies to the Traditional Orchard Priority Habitat south-west of Paradise Road and north-east of

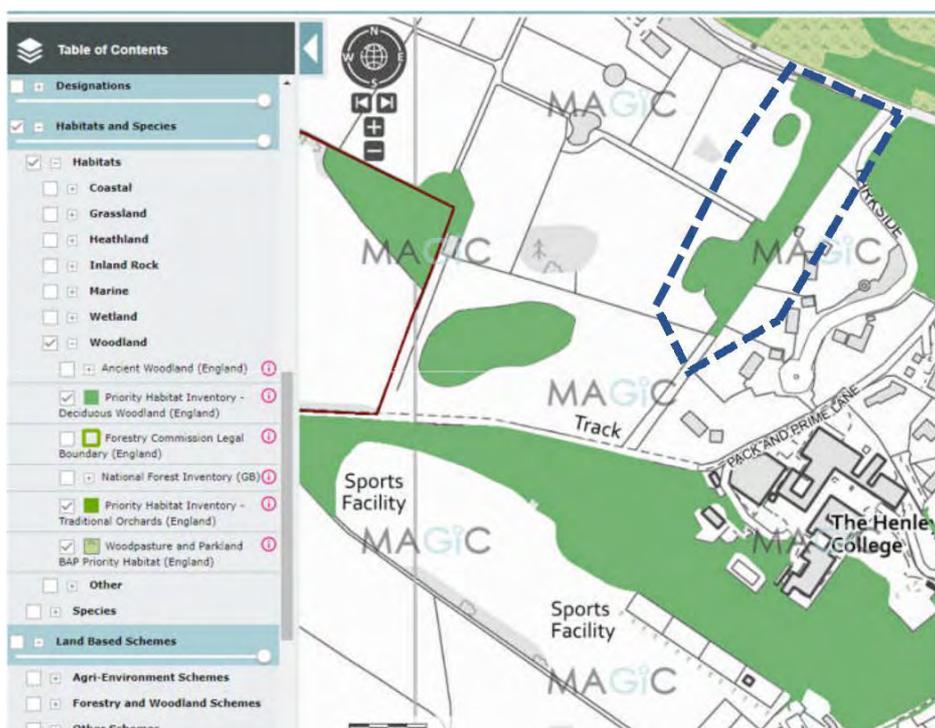
Leaver Road as shown above. Since these locations were not appraised as potential local green space sites, although these areas are not as extensive as some sites provisionally selected i.e. Henley College Woods, it is not considered that the Neighbourhood Plan Group has justified why any priority habitat would qualify as an important location for wildlife when determining local green space sites pursuant to paragraph 102 of the NPPF.

The discounting of priority habitats as evidence for wildlife within the justification of local green space sites is further illustrated by the Neighbourhood Plan's exclusion of areas within that shown for sites like '18 – Chalk Bank' and '26 – Sarah's Wood' as illustrated by the comparison below. The priority habitats as indicated on Magic cover a more extensive area than that envisaged as local green space.



This is therefore further evidence that “priority habitat” cannot be relevant for determining wildlife value pursuant to NPPF, paragraph 102.

The Topic Paper indicates that a further justification for including Parkside as local green space, is its role as part of a link between Friar Park and the Henley College Woodland. However, as explained, the ‘priority habitat – deciduous woodland’ north-west of Parkside is not proposed for local green space designation, even though it extends into the area between Parkside and the woodland of the college and also extends towards Friars Park. The failure to seek to protect the priority habitat north-west of Parkside (shown below edged by blue dashed line) as local green space is a further illustration that the policy approach is unjustified.



Since the Neighbourhood Plan's Baseline Report does not detail the full methodology for determining Local Green Spaces, it is not clear whether it has been adequately evidenced. Whilst we have referred to the Agendas for the Neighbourhood Plan Committee which potentially detail the methodology for determining whether sites accord with the NPPF paragraph 102 criteria, it is uncertain whether this has been refined prior to its finalisation in the Baseline Report. Without releasing the full methodology for consultation, it is not considered that the approach is justified as explained. It is consequently necessary for a full consultation to be undertaken on both the methodology together with the potential sites to establish the extent that they are appropriate.

Furthermore, as indicated for the Parkside Wood contended site (ref 23), there is no evidence to justify its designation as important for wildlife, which is the only criterion within the NPPF (paragraph 102) it was deemed to have achieved within the Neighbourhood Plan's assessment. As indicated, the ecological survey of the site (appendix 2 of the submission) does not confirm that it is important for wildlife and there is no evidence of how it performs as a contended link between Friars Park and the Henley College woodland. This is therefore a further indication that the approach of the draft Neighbourhood Plan is not supported by the necessary proportionate evidence as envisaged by paragraph 31 of the NPPF.

Having regard to this, policy ENV4 must be omitted from the Neighbourhood Plan prior to its submission to the District Council for their consultation. If it is to be retained, for the reasons explained, Parkside Wood must be omitted from the designation since it is not supported by the necessary proportionate evidence.

Representation to draft housing allocations in policy DS1.

Through the Pre-Submission Neighbourhood Plan, a number of sites are proposed for allocation to deliver additional homes across the joint plan area. Whilst we concur that it is essential that additional homes are allocated in the Plan, both to achieve the minimum requirements of policies STRAT1 and H3 of the South Oxfordshire Local Plan (December 2020), together with the flexibility within South Oxfordshire Local Plan policy H3 to provide further homes to contribute towards the need for affordable homes, we nevertheless object to the sites selected, especially those for:

- i) Policy DS7 - Highlands Farm (site M1) for around 110 dwellings, 1 ha of employment and relocation of Chilterns Centre;
- ii) Policy DS3 - land Gillotts School (Site C)) for around 50 dwellings; and
- iii) Policy DS9 - Chilterns Centre (site Y) for around 3 homes.

The reasons for our objections are detailed below, which primarily relate to identify sites that are inconsistent with the strategic policies of the Local Plan when there are clearly suitable alternative locations, such as at Parkside which should have been selected in preference.

In objecting to the allocation of these sites for housing, the dwellings that were to have been developed on these sites will need to be replaced by alternative allocations consistent with the approach of the NPPF and the Local Plan's Strategic Policies to ensure that the minimum of at least 1,285 dwellings are built in Henley-on-Thames over the period 2011 to 2035 (Policy H3).

Objection to Highlands Farm (Site M1) (Policy DS7)

The South Oxfordshire Local Plan (appendix 14) indicates that policies STRAT1, H3, HEN1 and ENV1 are strategic and therefore pursuant to guidance² and regulations³, the emerging Neighbourhood Plan should confirm with them. Of particular relevance to the Highlands Farm site, is that the Local Plan and NPPF (paragraphs 176 and 177) are clear that land within Areas of Outstanding Natural Beauty (AONB) should not be considered for major development, other than in exceptional circumstances and where it is in the public interest.

As the Pre-Submission Plan envisages development of around 110 dwellings together with 1 ha of employment and a relocated Chiltern Centre on the Highlands Farm site (all within the Chilterns AONB), the document should be accompanied by the necessary evidence to justify this location, especially as there is other land within the Joint Neighbourhood Plan area outside of the AONB which could readily be allocated to address both the housing requirements in Local Plan policy STRAT1 and H3 together with the flexibility for further sites to contribute towards affordable housing as envisaged by policy H3. These areas include those assessed as suitable within the

² NPPF, paragraph 29

³ Basic conditions for a Neighbourhood Plan

detailed Site Assessment Report together with the land controlled by our clients north of Parkside (and unjustifiably included as Local Green Space).

Policy STRAT1, particularly criterion ix emphasises the need to protect and enhance the AONB as detailed below.

1. Proposals for development in South Oxfordshire will be assessed using national policy and guidance and the whole of the Development Plan* and should be consistent with the overall strategy of:

- i) focusing major new development in Science Vale including sustainable growth at Didcot Garden Town and Culham so that this area can play an enhanced role in providing homes, jobs and services with improved transport connectivity;**
- ii) providing strategic allocations at Chalgrove, Culham, Berinsfield, Grenoble Road, Northfield, North of Bayswater Brook and Wheatley including necessary infrastructure and community facilities;**
- iii) close working with partner agencies, neighbouring local authorities, communities and other stakeholders to ensure the timely delivery of our strategy, which will deliver a significant amount of growth beyond the end of the plan period;**
- iv) supporting and enhancing the economic and social dependencies between our towns and villages;**
- v) supporting the roles of Henley-on-Thames, Thame and Wallingford by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure;**
- vi) meeting unmet housing needs of Oxford City on strategic allocations adjacent to the boundary of Oxford near to where that need arises;**
- vii) supporting and enhancing the roles of the Larger Villages of Benson, Berinsfield, Chalgrove, Chinnor, Cholsey, Crowmarsh Gifford, Goring-on-Thames, Nettlebed, Sonning Common, Watlington, Wheatley and Woodcote as local service centres;**
- viii) supporting Smaller and Other Villages by allowing for limited amounts of housing and employment to help secure the provision and retention of services;**
- ix) protecting and enhancing the countryside and particularly those areas within the two AONBs and Oxford Green Belt by ensuring that outside of the towns and villages any change relates to very specific needs such as those of the agricultural industry or enhancement of the environment;**
- x) supporting and enhancing our historic environment; and**
- xi) contributing to tackling climate change.**

The approach of policy STRAT1 concerning protecting and enhancing the AONB is further reinforced by the approach of strategic policy ENV1. This states:

Some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones. Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB, a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable. Other villages are unconstrained and can plan for more than 15% growth. The level of growth proposed should be evidenced within the Neighbourhood Development Plan with local communities helping to shape the development of their village. Ultimately the detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of capacity, whether this is to support a higher or lower number than that provided in Table 4f: Provision of homes at Larger Villages. Neighbourhood planning groups will need to cooperate with infrastructure providers and statutory consultees to provide this evidence, and develop viable solutions for any infrastructure provision that is needed.

Although this paragraph refers to villages, given the clear guidance in the NPPF paragraphs 176 and 177) together with Local Plan policies STRAT1 and ENV1, it is essential that to support major development (such as that associated with the draft allocation at Highlands Farm), a Landscape and Visual Impact Assessment is undertaken. The Examiner's Report (page 18) on the current Joint Neighbourhood Plan recognises the impact that the redevelopment of the brownfield site envisaged was a concern of the Chilterns Conservation Board as indicated in his summary:

With regards to Site M, the Chilterns Conservation Board has expressed concern regarding potential impact on the AONB. The Framework affords great weight to conserving landscape and scenic beauty in AONBs. In this respect, I agree that it would be clearer for Policy SP1 to separate out matters relating to impact on the AONB to those relating to green infrastructure and biodiversity. However, having regard to Paragraph 59 of the Framework, which states that "*design policies should avoid unnecessary prescription or detail,*" I consider that the Policy would not meet the basic conditions if it was overly prescriptive. I take these factors into account in making the recommendations below.

The modification to the allocation policy for Highlands Farm required by the examiner was detailed on page 19 of his report and confirmed:

Policy SP1, end f) at "...boundary edges." Introduce a new bullet point, below, stating "*Ensures that the development has no greater impact on the AONB than the existing development on the site; and that development conserves*

and where possible, enhances the landscape and scenic beauty of the AONB.”
Remove apostrophe in 8.2 (and 7.54) and refer to “AONB” in 8.23 (and 4.31).

As the current allocated site at Highlands Farm in the Neighbourhood Plan included previously developed land, as recognised by the examiner redevelopment was feasible whilst ensuring development had no greater impact upon the AONB than that which was already on the site. However, the draft allocation for 110 dwellings, 1 ha of employment and a relocated Chilterns Centre involves development of a greenfield area of the AONB, for which no visual impact assessment has been undertaken. As indicated, this is a clear requirement for Neighbourhood Plans where such development is envisaged.

The Baseline Report (page 84) provides an appraisal of the Landscape Impact of the potential development of Highlands Farm (site ref 853a) which states:

It is considered that the public benefit provided through this scheme would outweigh harm to the Area of Outstanding Natural Beauty (AONB). The landscape sensitivity is influenced by the new housing being built on the existing allocation Site M: Highlands Farm. Any impact could be mitigated by existing and new hedges and tree planting within the site.

This is not considered to be an adequate and sufficient landscape assessment to support the major development envisaged in the Pre-Submission Draft Neighbourhood Plan, taking account the clear guidance in the NPPF and Local Plan together with the clear concerns of the Chilterns Conservation Board on the previously plan, albeit that this was with respect of the redevelopment of a previously developed site, rather than green field land as now envisaged.

Furthermore, the Baseline Report (page 83) indicates that the Site Assessment by AECOM concluded:

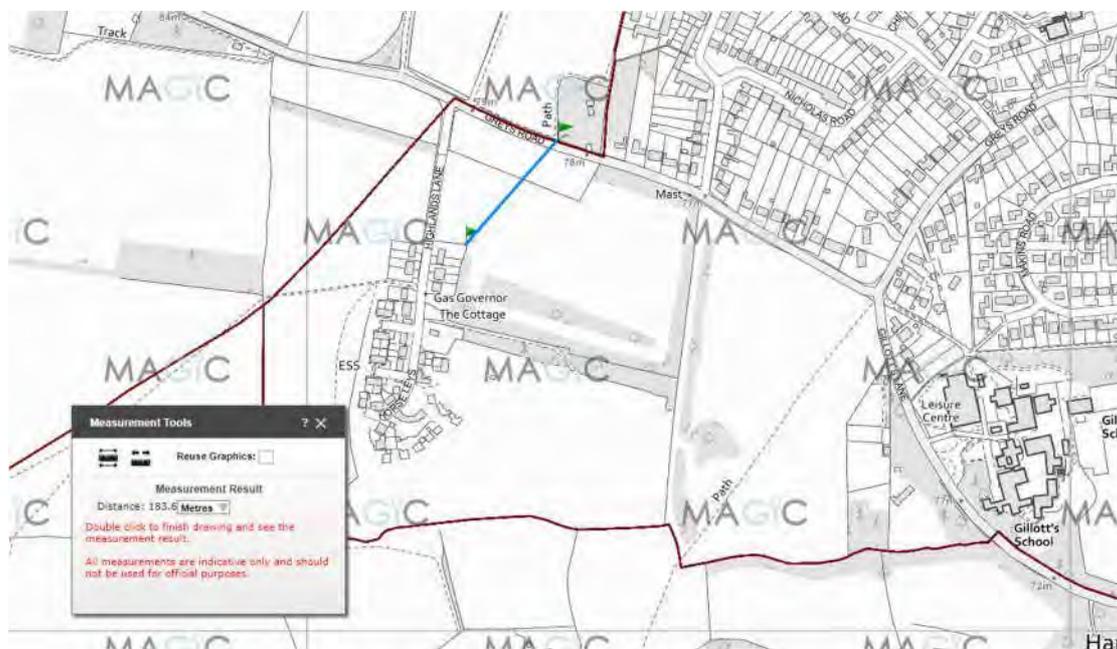
853a is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site (once the wider side construction is complete) is within the built- up area.

The area put forward in the Neighbourhood Plan Call for Sites (853a) is suitable for allocation as there are no major constraints and once the other part of the site is completed, it will be within the built-up area.

The site’s suitability would remain the same should the emerging plan become adopted policy, as it is in conformity with Policy H1 as the site is appropriate infilling within the existing built-up area.

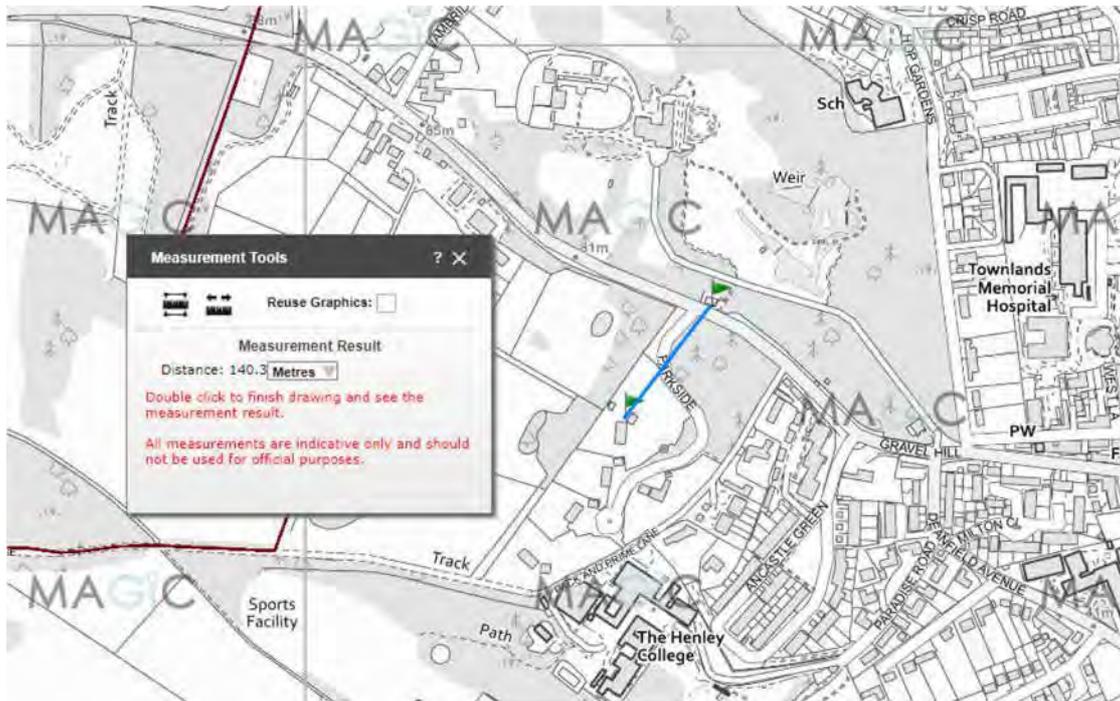
However, the assessment above does not acknowledge that site 853a lies within the Chilterns AONB, which is a significant constraint as listed in footnote 7 of the NPPF. Furthermore, whilst it suggests that once development of the existing area allocated

in the Neighbourhood Plan is complete, the site would lie within the built-up area. However, as indicated below, the development approved (alongside the existing homes on Highlands Lane) at Highlands Farm lies at least 180m from the existing buildings along Greys Road with clear undeveloped areas to the east and west. This is shown by the extract below indicating that the extent of the curtilages were at least 180m apart, with the buildings a greater distance.



Measurement to eastern part of developed site

Elsewhere around within the Site Assessment by AECOM, where existing buildings are closer than 180m from others, they have not been regarded as being within the built-up area, as illustrated by the appraisal of our client site at Parkside. For this, it was concluded that it lay adjacent rather than within the built-up area, although as Magic indicates, the nearby buildings are within 140m and therefore taking the approach the Neighbourhood Plan assessment relies upon, it would be regarded as suitable. This is any buildings at Parkside would entail development within significantly shorter distances than that currently associated with Highlands Farm, which is suggested as being within the built-up area.



Since site 853a is not considered to lie within the built-up area, applying the approach currently relied upon in the Site Assessment process, it should be discounted as an allocation. The failure to provide a Visual Impact Assessment demonstrating that the site can be developed without harming the visual qualities of the AONB is a further indication that it should be removed, with alternative sites included, especially taking account the potential of land outside of the AONB.

The site must therefore be omitted as its inclusion is inconsistent with the NPPF and the strategic policies of the Local Plan and consequently would fail the basic conditions test for the emerging Neighbourhood Plan

Site C (Gillots School Field)

This site is allocated in the existing Neighbourhood Plan and has failed to come forward. This is therefore an indication of the poor developability status of the site and why alternatives should be identified.

The satellite image confirms the sports pitch status of this site:



Paragraph 99 of the NPPF states as follows:

‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or**
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or**
- c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss’.**

The Qualifying Body have not produced any evidence base confirming that the sports pitches are surplus to requirements and instead the sports pitch proposed for development at this site are being released for commercial reasons as detailed in the Site Assessment Report. This indicates (page 74) that:

The school is proposing to sell the site to allow improvement and renovation of the school. This site is included as an allocation in the made Neighbourhood Plan for 50 dwellings.

Whilst the Baseline report indicates that the school intends to improve and renovate the school, since the land is used as sport pitches, consent for any loss must be obtained from the Department for Education⁴. As their consent has yet to be applied for⁵ there is no certainty that it would be forthcoming. This is important as the

⁴ [Advice template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

⁵ As proposed redevelopment of the Gillotts School is not shown in the current list from the Department - [Decisions on the disposal of school land - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Department for Education's guidance indicates that consent will not be forthcoming if there is insufficient playing fields and sports area available (paragraph 12). This states:

You should read Annex C on how to calculate the need for playing field land and the guidance on consultation at Annex D. You should note that the Secretary of State is unlikely to approve applications that result in the school's playing field provision falling under the area guidelines, and also has the power to direct that the disposal should simply not take place. You should discuss your proposals with Sport England at an early stage as they will be involved as a statutory consultee when you submit any planning application

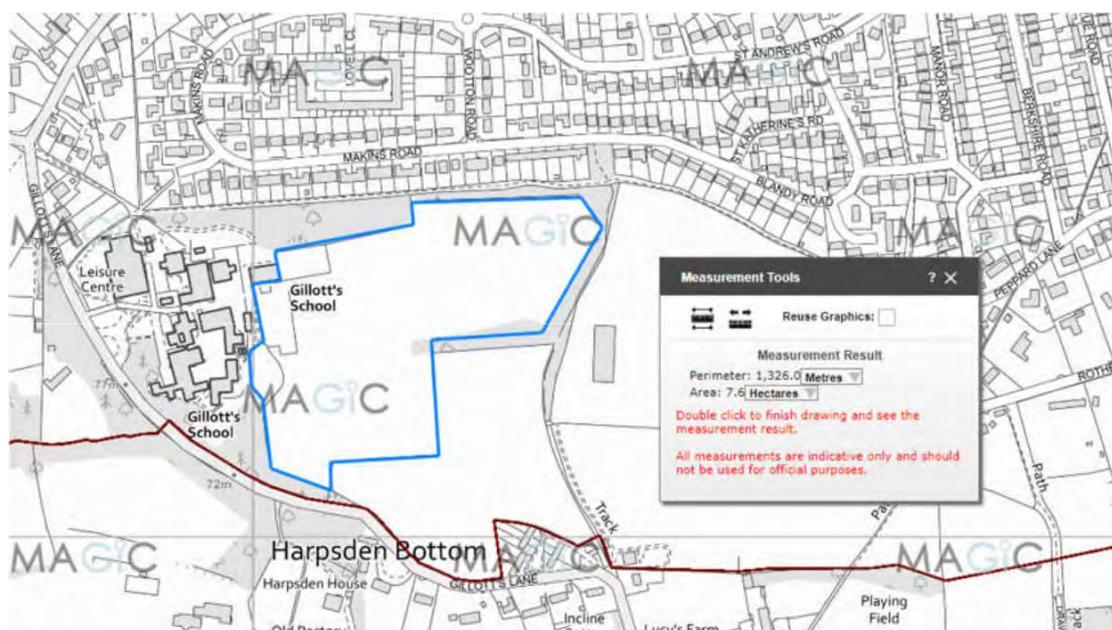
The information from the Gillot's School indicates that the admissions number is 200 pupils per academic year⁶. Therefore, as the school provides education for 11-16 year olds, it will accommodate 1,000 pupils. The Government's Guidance on disposals of school sites⁷ indicates that a secondary school with 1,000 pupils must have a minimum of 8.9ha of sports pitches/playing fields available (table 1).



Aerial photo of school site

⁶ [Gillotts School](#)

⁷ [Advice template \(publishing.service.gov.uk\)](#)



Initial measurement of Gillots School playing fields

We have undertaken an initial assessment of the extent of sport pitches/playing fields at Gillots School (excluding the tree belts) as indicated on the extract from Magic. This suggests that for the school as currently operating with 1,000 pupils, there is insufficient playing fields to reflect the Government's guidelines. Consequently, as the Government has indicated that it is unlikely to approve the disposal of any of the sports pitches at Gillot's school where there is insufficient playing fields, it is not considered that the draft allocation at the site is appropriate. Therefore, the School Playing fields are both undeliverable and undevelopable.

This is notwithstanding that to access the proposed allocation, trees are likely to need to be removed, together with clarification on where any vehicular access is to be provided. This is because the site does not currently benefit from a direct access onto an adopted highway.

For the above reasons, the allocation of this site is inconsistent with the content of the NPPF and thus **its allocation does not pay sufficient regard to national policy and fails the Basic Conditions test.**

Chilterns Centre, site 2.

The Neighbourhood Plan indicates that redevelopment of this site for 3 dwellings is only feasible through its relocation to an alternative site (currently proposed as Highlands Farm). Since the draft allocation at Highlands Farm is inconsistent with the NPPF and Local Plan Strategic Policies, as it entails may development in the AONB, it is not feasible to relocate the Chilterns Centre to the site.

As the existing Chilterns Centre would not be available for redevelopment, the 3 dwellings proposed for the site would not be achievable and consequently alternative sites found to compensate for its loss. This would include our clients land at Parkside. Any proposal without adequate re-provision would be contrary to policy CF1 of the Local Plan, another strategic policy in the plan.

The failure to show appropriate re-provision of the Chiltern Centre through a site consistent with other strategic policies of the Local Plan together with the NPPF indicates that this allocation **does not pay sufficient regard to national policy and fails the Basic Conditions test.**

Land north of 5 Parkside (Site 988)

I now discuss the site's respective benefits and the reasons why the Plan should be amended to include the site as an allocation for at least 8 dwellings.

My clients have reviewed the site context and discussed the site with the Neighbourhood Plan group over a number of years, including during the preparation of the current document. We therefore consider a scheme of at least 8 dwellings is feasible on the site taking into account arboricultural considerations and the need to provide landscaping/open space.

A Site Plan is attached that illustrates a scheme comprising 8 no. residential apartments. The proposal has been informed by a recent Tree Survey and would retain the majority of the trees located on the edges of the site that are important for visual amenities. In terms of its siting, the proposed apartment building would occupy the central area of the site allowing for a strong buffer of existing trees to be retained within the site providing amenity value and maintaining the self-contained nature of the site. Consequently no adverse impacts on the qualities of the adjoining AONB or Conservation Area will occur and the semi-rural appearance of Gravel Hill is maintained. No residential amenity issues will arise either. A Phase 1 ecology report has confirmed the site has low opportunities for protected species (enclosed).

A Sustainability Location Plan (Ref. SK06A) is provided in support of this submission. A copy of this plan is provided below.



In addition, the above plan confirms the site's easy walking or cycling access to the town centre:

Such levels of connectivity and proximity to the Town Centre is unmatched by many of the Neighbourhood Plan allocations.

As confirmed on the above plans, the site benefits from a location within walking distance of the services and facilities in Henley on Thames Town Centre including Townlands Hospital, the Town Hall and shopping facilities. The site lies approximately 1Km from Henley on Thames Train Station. This station offers links to London Paddington, Reading and Oxford. Consequently the site benefits from a sustainable location within walking distance of both key services and public transport facilities. Paragraph 45 of the previous Inspector's Report confirmed the site benefits from a sustainable location.

'I recognise that the appeal site is within easy walking distance of the town centre so that future residents of the proposed house could access a range of services and facilities without the use of a car. In this respect, the development would comply with national and local policies on sustainability' (paragraph 45).

The site at Parkside is sustainably located and since does not qualify as local green space can readily be included as a housing allocation, thereby addressing the shortfall which will arise through the omission of the allocations at Highlands Farm (Site M), Gillotts School (Site C) and the Chilterns Centre (Site F).

Assessment of the Neighbourhood Plan against the Basic Conditions

The Neighbourhood Plan must meet the "Basic Conditions". These are set out in Law [paragraph 8[2] of Schedule 4B of the Town and Country Planning Act 1990]. In order to meet the Basic Conditions, the Neighbourhood Plan must:

- Have regard to national policies advice contained in guidance issued by the Secretary of State;
- Contribution to the achievement of the sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area; and
- Be compatible with EU obligations.

As drafted it is our position that certain of the sites proposed for allocation within the Neighbourhood Plan are not consistent with national or local planning policy or contribute towards sustainable development. On this basis I consider an examiner would deem that the Neighbourhood Plan does not meet the Basic Conditions and should not proceed to referendum.

Proposed Change/Summary

The first section of this letter confirms that the Qualifying Body can make amendments to the Neighbourhood Plan in response to consultation and then submit the amended plan to the District Council without any further consultation or undesirable further delay. This includes removal of the unjustified local green space sites (especially that proposed for the Parkside site controlled by our clients) together with the removal of unjustified housing allocations. The latter sections of the letter refer to the benefits of Parkside as a site allocation.

For the reasons set out above, I consider that allocation of my client's site would be consistent with the basic conditions and should be **inserted into the NP as an allocation for at least 8 residential dwellings.**

I am happy to enter into further dialogue with the Qualifying Body regarding the site as deemed necessary.

I look forward to hearing from you in due course.

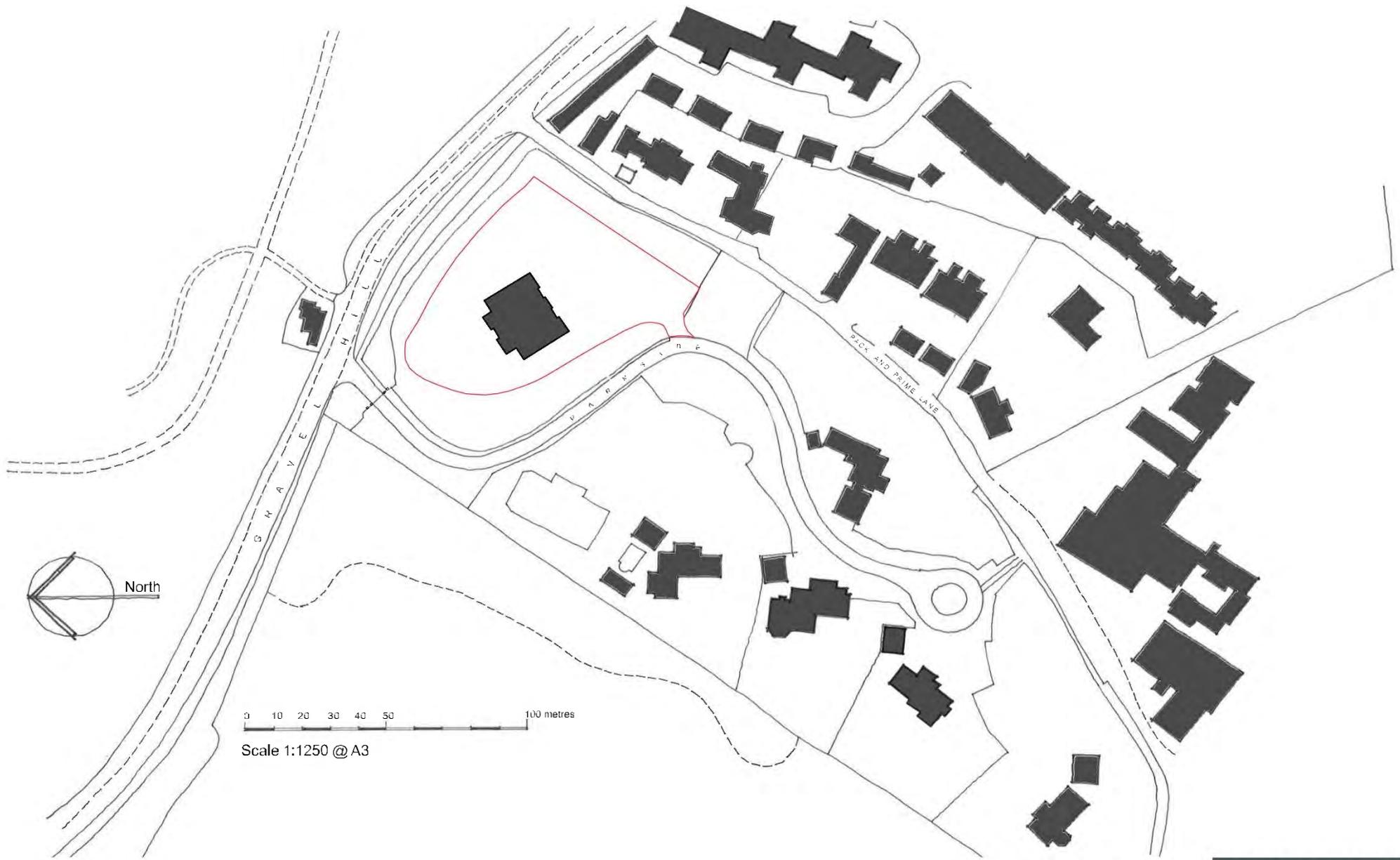
Yours faithfully,

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

Douglas Bond BA (Hons), MRTPI

Enc.

CC: Mr T. Bingham



Proposed Residential Development - Parkside - Henley on Thames
 Site Location Plan - 5568 - 100 - Feb 2020

EDGINGTON SPINK HYNE
 MERIDIAN HOUSE, 2 RUSSELL STREET
 WINDSOR, BERKSHIRE, SL4 1HQ
 TEL: 01753 857092
 FAX: 01753 857096
 WEB: www.edgingtons.co.uk
 EMAIL: mail@edgingtons.co.uk





AA Environmental Limited
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Shippon
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Oxon OX13 6HX
T: 01235 536042 F: 01235 523849
E: info@aae-ltd.co.uk W: www.aae-ltd.co.uk

3 June 2020

Our ref: 203140/JDT

Mr Bingham
c/o Mr N Jackson
Jackson Development Services
6 Harvest Place
Wargrave
Reading
Berkshire
RG10 8AQ

Dear Mr Bingham

LAND AT PARKSIDE, HENLEY-ON-THAMES

Introduction

In accordance with your instructions, AA Environmental Limited (AAe) carried out a follow-up ecological survey of the above site on Wednesday 29 April 2020. Although previous ecological surveys have been carried out by AAe in 2016, it was considered best practice to carry out a follow-up survey to update the previous findings and to record any changes that may have occurred during the intervening period. A series of photographs has been attached for reference.

The proposals are for the development of an apartment block, requiring the clearance of some of the existing vegetation. The design of this scheme in comparison to the previous, has been amended to reduce the impacts of the proposals. The scheme has been designed sensitively so that features of ecological value, such as key trees, will be retained where possible and areas of the site enhanced.

Methodology

Baseline Data

A review of AAe Letter Report (July 2016), including the baseline ecological data obtained from Thames Valley Environmental Records Centre (TVERC) for the site and a 2 km radius, was completed to provide baseline conditions for the site. In addition, as certain baseline data is now readily available on the internet, the Multi-agency website (www.magic.defra.gov.uk) was consulted to determine whether any part of the site or nearby habitats have been statutorily or otherwise designated and a review of Google Earth's satellite imagery (http://www.google.co.uk/intl/en_uk/earth/index.html) was completed to determine past land uses of the site and surrounding land.

Walk-over Site Survey

During the walk-over survey, particular attention was paid to record the presence of badgers, bats and herpetofauna (amphibians and reptiles) that may be using the site or present in adjacent habitats, in accordance with the following survey methodologies:

Badgers

Badgers (*Meles meles*) and their setts are protected by the *Protection of Badgers Act 1992*, under which it is an offence to harm badgers or their setts. A sett is defined as "any structure or place which displays signs indicating current use by a badger". Natural England has provided the following guidance on the interpretation of current use:

Registered Office (England & Wales) Company No. 8474322
AA Environmental Ltd Units 4-8 Cholswell Court
Shippon Abingdon Oxon OX13 6HX



A sett is defined as such (and thus protected) as long as signs indicative of 'current use' are present. Thus, a sett remains protected by the Act until such times as the signs (i.e. 'field signs') have deteriorated or decayed to such an extent that they indicate that the sett is no longer in 'current use'

A thorough survey of the whole site and adjacent habitats, where access was available, was carried out. Particular attention was paid to dense areas of vegetation to check for any evidence of badger activity, which is usually detected by any one or more of the following signs:

- presence of holes with evidence of badger, such as footprints, discarded hair, etc.;
- presence of dung pits and latrines;
- presence of well-used runs with subsidiary evidence of badger activity; and
- presence of other indications of badger activity, such as signs of foraging and footprints.

Bats

Currently there are 17 species of bat known to breed in the UK. All species and their roosts are protected under Regulation 41 of *The Conservation of Habitats and Species Regulations 2010 (as amended)*. As a signatory to the *Bonn Convention (Agreement on the Conservation of Bats in Europe)* the UK is also required to protect their habitats. This legislation makes it illegal to kill, injure, capture or disturb bats, or to obstruct access to, damage or destroy bat roosts. Under the law, a roost is any structure or place used for shelter or protection.

A visual survey of the site was completed to record any evidence of bats or features that could provide potential roosting opportunities. The survey was carried out following the guidelines provided by the Bat Conservation Trust¹. A careful inspection of each tree scheduled to be removed was carried out to identify those features that are important for roosting bats. Surveying trees presents particular problems at any time of the year as bats will use a wide variety of roost sites in cavities, splits, cracks, knotholes and under loose bark, many of which are not easily detected from the ground.

Each tree was assessed in accordance with the following criteria:

- **Negligible** – negligible habitat features likely to be used by roosting bats.
- **Low** – a tree of sufficient size and age to contain potential roosting features (PRFs) but with none seen from the ground or features seen with only very limited roosting potential.
- **Moderate** – a tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
- **High** – a tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

The surrounding habitat was also surveyed to identify any important features such as mature trees with suitable features for roosting bats and any established lines of vegetation that might provide important flightlines.

Evidence of bats is usually detected by any one or more of the following signs:

- the presence of bat droppings, which tend to accumulate under established roost sites or at roost entrances;
- the accumulation of large numbers of moth wings, which have been discarded by feeding bats;
- areas of staining by urine or from fur rubbing; and
- the presence of bats themselves or their corpses.

¹ Collins, J. (ed) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition)*. The Bat Conservation Trust, London.

The visual survey was facilitated by the use of binoculars, ladders, powerful torches (1M candlepower) and a Ridgid Micro CA-350 Inspection Camera endoscope.

Herpetofauna

Amphibians

All amphibian species have some level of protection under the *Wildlife and Countryside Act 1981 (as amended)*. Great crested newts (*Triturus cristatus*) are protected under the *Wildlife and Countryside Act 1981 (as amended)* and *The Conservation of Habitats and Species Regulations 2010 (as amended)*. The intentional or reckless killing, injury or taking, and intentional or reckless disturbance of great crested newts whilst occupying a 'place used for shelter or protection' is prohibited, as is the destruction of these places.

Reptiles

All reptile species are protected at some level under Schedule 5 of the *Wildlife and Countryside Act 1981 (as amended)* and *The Conservation of Habitats and Species Regulations 2010 (as amended)*. The more common species of reptiles, which include slow-worm (*Anguis fragilis*), common or viviparous lizard (*Zootoca vivipara*), adder (*Vipera berus*) and grass snake (*Natrix helvetica*) are protected by the *Wildlife and Countryside Act 1981 (as amended)* by part of *Section 9(1)* and all of *Section 9(5)*. This means that they are protected against intentional or reckless killing and injuring (but not 'taking') and against sale and transporting for sale.

An assessment of the site was carried out to determine its suitability for herpetofauna by recording the habitats present. In addition, any natural/artificial refugia present on the site was lifted to check for any sheltering animals or evidence of animals, such as sloughs (shed skins).

Other Wildlife

In accordance with good practice, the site was checked for any evidence of other protected species or species of particular note.

Results

Baseline Data

During the initial walk-over survey (29 July 2016), no evidence of protected species was recorded, with only a few disused mammal holes present. Although the shape was thought to indicate that these could have been originally excavated by badger, the condition and restricted size confirmed that none of the holes had been active for some time. No supplementary evidence of badgers was recorded despite a thorough search of the site.

According to the Multi-agency website, there are no ecological statutory designated sites located on or directly adjacent to the site. The nearest ecological statutory designated site is Lambridge Wood Site of Special Scientific Interest (SSSI), located approximately 1.3 km to the north-west of the site. Other statutory designated sites within the 2 km study area included Highlands Farm Pit SSSI, located 1.5 km to the south-west, Temple Island Meadows SSSI, located 1.9 km to the north-east and Harpsden Wood SSSI, located 1.9 km to the south-south-east. The site is noted as Deciduous Woodland, a Habitat of Principal Importance (HPI).

TVERC held no records of protected or notable species on the site itself although there were a number of records within the study area. The closest non-statutory designated site was Hernes Local Wildlife Site located 0.41 km to the west of the site.

Google Earth Imagery shows that the site has remained largely unchanged since at least 2005, comprising the existing woodland.



Site Description (Photographs 1-4)

The site is located off Parkside, Gravel Hill in Henley, centred at National Grid Reference: SU 754826 and covers 0.49 of a hectare, with additional land set aside as a landscape buffer. The site is bordered by Pack and Prime Lane to the East, Gravel Hill to the North, Parkside to the West and a residential garden (of 1 Parkside) to the South. The site was covered by semi-natural deciduous woodland.

The site conditions remained similar as before with no notable changes recorded. Species recorded as part of the upper canopy included pedunculate oak (*Quercus robur*), beech (*Fagus sylvatica*), silver birch (*Betula pendula*), Norway spruce (*Picea abies*), sycamore (*Acer pseudoplatanus*), ash (*Fraxinus excelsior*), lime and large-leaved lime (*Tilia x europaea* and *T. platyphyllos*), horse-chestnut (*Aesculus hippocastanum*), red oak (*Quercus rubra*), Norway maple (*Acer platanoides*), Douglas fir (*Pseudotsuga menziesii*), evergreen oak/Holm oak (*Quercus ilex*), western red cedar (*Thuja plicata*), yew (*Taxus baccata*), copper beech (*Fagus sylvatica f. purpurea*), European larch (*Larix decidua*), cherry (*Prunus sp.*), hornbeam (*Carpinus betulus*), black walnut (*Juglans nigra*), goat willow (*Salix caprea*) and elm (*Ulmus sp.*). The shrub layer comprised laurel (*Prunus sp.*), hawthorn (*Crataegus monogyna*), holly (*Ilex aquifolium*), sycamore, cherry, elder (*Sambucus nigra*), honeysuckle (*Lonicera periclymenum*) and bramble (*Rubus fruticosus* agg), with ground flora including foxglove (*Digitalis purpurea*), dog's mercury (*Mercurialis perennis*), pendulous sedge (*Carex pendula*), primrose (*Primula sp.*), herb-Robert (*Geranium robertianum*), cleavers (*Galium aparine*), green alkanet (*Pentaglottis sempervirens*), garlic mustard (*Alliaria petiolata*) and ground-ivy (*Hedera helix*). Several of the mature and semi-mature trees/shrubs were clad in common ivy (*Hedera helix*).

Badgers

No fresh evidence of badgers was found within any of the mammal holes previously recorded on the site, with no supplementary evidence of badgers found on or adjacent to the site. A number of mammal runs were recorded at the site boundaries but despite a careful search only deer (*Cervidae sp.*) hairs were found where they had pushed under boundary fences.

Bats

The majority of the trees were assessed to provide **negligible** roosting opportunities for bats due to their age/species and lack of any obvious PRF's. However, a number of trees were assessed to be **low** suitability for roosting bats including a sycamore (tree number 70) due to its size, Turkey oak (tree number 206), and two silver birches (tree numbers 21 and 22). The site, being dominated by woodland, did provide some foraging habitat for bats, although, due to its restricted size was considered to be of no notable value.

Herpetofauna

There were no waterbodies present on the site and therefore no breeding opportunities for amphibians. As the site was dominated by woodland with a dense canopy it does not provide ideal terrestrial habitat for any species of herpetofauna. The site is bordered by roads and well-maintained residential properties and therefore poorly connected to surrounding habitat, which would inhibit any potential colonisation of the site. In addition, despite a careful search of the site, no species of herpetofauna was found sheltering under any refugia lifted during either site survey.

Other Wildlife

Apart from deer already mentioned and a few common species of birds, either recorded on the site or flying overhead, no other species of any note were recorded.



Conclusions and Recommendations

The proposals are for the development of an apartment block, requiring the clearance of some of the existing vegetation. The design of this scheme in comparison to the previous, has been amended to reduce the impacts of the proposals. The scheme has been designed sensitively so that features of ecological value, such as key trees, will be retained where possible and areas of the site enhanced.

Although the site is not statutory or otherwise designated, it is noted as Deciduous Woodland HPI on the Multi-agency website and therefore a series of specific and generic mitigation measures, as detailed below, should be implemented to reduce any impact the development proposals would have on local wildlife. In addition, a range of enhancement measures will be incorporated to compensate for the loss of habitats with the aim to increase the biodiversity value of the site in the long-term, in accordance with Government guidance as set out in National Planning Policy Framework (NPPF) 2019².

Although no fresh evidence of badgers was recorded, as there is some historical use and are likely to be active in the area, a series of mitigation measures should be implemented. Typical measures include the following:

- any temporary and permanent fencing to be installed should allow badgers and other mammals unrestricted access. This can be achieved by raising any fencing slightly off the ground (200 mm) or be installing post and rail fencing;
- any deep excavations that are to be left open overnight should include a means of escape for any animals that may fall in, using planks of wood to act as ramps;
- no pipework should remain open with any exposed ends capped-off at the end of the working day to prevent any animals entering pipework. **N.B. Badgers can enter pipework as small as 250 mm in diameter and therefore all pipework should be capped-off in accordance with good practice;**
- as badgers can excavate new setts, any fresh excavations recorded on the site should be immediately reported and fully investigated;
- obvious badger paths should be left clear of obstruction;
- there should be no fires on the site. The site should be kept tidy with any litter picked up and disposed of appropriately. Where possible, materials/equipment/chemicals should be stored away and not left out overnight but any materials/equipment left out should be stacked in such a way so as to avoid the risk of collapsing;
- where possible, works should be limited to the hours from dawn to one hour before sunset; and
- the creation of large stock piles of earth should be avoided as these may prove attractive for badgers to excavate new setts.

Badgers, like all wild animals, are dynamic and react to internal and external stimuli in ways which are not always predictable and can excavate new setts or re-occupy others and depending upon the timescale of the proposals further monitoring surveys may be required.

Although no evidence of bats was recorded, with all of the trees scheduled to be felled assessed to provide either **negligible** or **low** roosting potential for bats, in accordance with good practice the tree felling/clearance works should be completed by competent contractors fully conversant with current legislation protecting bats and their roosts (a toolbox talk has been attached for reference). In the unlikely event of any bats being encountered during any works, then works should stop immediately and Natural England or AAE contacted so that appropriate advice can be provided.

It should be noted that all species of wild bird and their nests are protected under the *Wildlife and Countryside Act 1981 (as amended)*. Therefore, in order to avoid contravention of current legislation, site clearance works should be timed to avoid the main bird nesting season, which, in general, runs from March to August inclusive. If this is not possible, a check should be carried out prior to any clearance works to ensure there are no active nests present.

² Ministry of Housing, Communities and Local Government (2019). *National Planning Policy Framework*. London.

In order to protect the established vegetation to be retained, suitable fencing may be required at certain locations to reduce the possibility of any damage that could be caused during the works. To minimise accidental damage, any overhanging branches should be pruned back to suitable live growth points. All works should be undertaken by a suitably qualified and experienced specialist contractor and should conform to current industry best practice, i.e. BS 3998: 2010 '*Tree Work - Recommendations*'. The retention and protection of the majority of the boundary vegetation will help to maintain existing commuting/foraging routes currently utilised by bats and other species.

A series of bird/bat boxes will be installed on some of the established vegetation to be retained and incorporated into the new build to provide enhanced nesting/roosting opportunities. Any boxes installed should be positioned in accordance with good practice.

In order to compensate for the loss of woodland, the retained areas will be managed sensitively so that the ecological value is enhanced with biodiversity off-setting also completed. Measures will include the following (further details could be provided within a Conservation and Woodland Management Plan):

- Maintain the woodland cover in the long-term through an ongoing programme of replanting to establish overstorey and understorey trees of native species. New planting checked annually to ensure establishment with any replacement planting completed, as necessary.
- Retain dead standing and fallen trees as deadwood habitat where this will not pose a safety hazard. Retain fallen dead branches close to the trees from which they came to maintain the continuity of wildlife habitat.
- Undertake periodic selective thinning³ to allow trees of best form and condition to grow on to maturity.
- Identify a number of mature trees to be retained as veterans (trees that can be retained for an extended period with a range of deadwood features that are of value to wildlife). Where necessary undertake selective thinning around these trees to control competition from their neighbours.
- Follow a programme of periodic coppicing⁴ of the understorey species to maintain a diversity of light levels and lower canopy structure. This will increase the floristic diversity of the woodland and thus its value for wildlife.
- Undertake periodic inspections of the structural condition of trees on the public boundaries to ensure tree safety.
- Undertake periodic inspections and management along public boundaries to create a woodland edge habitat, as required.
- Periodic check and clearance of deposited garden waste within the woodland area, with the material disposed of in accordance with the regulatory regime.
- All deadwood and any arisings from management works will be retained within the areas of woodland either as log/brush piles. This will provide habitat and shelter for a range of wildlife. In addition, any existing deadwood should be carefully lifted and added to the piles where practicable.
- An annual check and cleaning of the bird boxes will be required, which will be carried out during the winter months, with any remedial measures completed as necessary. Bat boxes do not require cleaning as regularly, although periodic maintenance checks should be carried out (**Note: any works/checks to bat boxes might require a licensed bat worker**).

As part of the proposals, soft landscaping will be carried out. Where any new planting is proposed it should aim to use native species, but where this is not practicable then species of known value for wildlife can be used. In particular, flowering plants will be of benefit to invertebrate species and shrubs and trees may provide nesting opportunities for birds once they become established.

³ Thinning: the removal of growing trees to reduce competition of light with trees which it is wished to retain.

⁴ Coppicing: repeated cutting, typically on a cycle of 10 – 15 years, of certain tree/shrub species that grow vigorously from the cut stems – there are a number of hazel coppiced stools present within the woodland area.

The effects of lighting on plants and animals are difficult to assess, but it is thought that lighting can adversely affect invertebrates, birds and bats. As the site currently experiences only a small amount of light spillage, in accordance with good practice, any new lighting to be introduced should be designed to minimise light spillage and pollution and not directed onto any bird/bat boxes installed or onto retained areas of woodland, which should remain dark, where possible.

Any new boundary treatment should be designed to promote permeability of the site to minimize fragmentation and allow free movement of wildlife throughout the site, for example by strengthening/enhancing the existing boundary vegetation, planting up a series of new hedgerows and/or installing post and rail fences. These measures will strengthen habitat connectivity and provide additional foraging habitat, cover and nesting opportunities. If close-board fences are required for security reasons, these should be minimised and raised slightly off the ground (c. 150-200 mm) to allow animals to pass underneath.

A range of generic mitigation/enhancement measures have been suggested, and if implemented effectively, would reduce the impact of the works on local wildlife and potentially increase the nature conservation value of the site in the long term in accordance with Government guidance as set out in National Planning Policy Framework.

Overall the findings of this ecological survey would indicate that there are no over-riding ecological constraints to the development proposals that would preclude planning permission being granted at this stage, subject to appropriately worded conditions.

I trust the above is of interest and provides the Local Planning Authority with enough information to determine the application but let me know if further clarification is required.

Yours sincerely



Julian Thornber
BSc (Hons) MCIEEM
Class Licences CL08 and CL18

Encls. Photograph Record Sheet (Drg. No. 203140/01)
Toolbox Talk (Bats)



Photograph 1: Showing the existing access road to the site.



Photograph 2: Showing some of the trees on the site, which will need to be cleared.



Photograph 3: Showing some of the dune aurel, which can be eradicated/controlled to enhance the ground conditions.



Photograph 4: Showing some of the trees on the site, which will need to be cleared.

Rev.	History	Drawn	Date
		GAAR	
PROJECT Land at Parkside Harley-on-Thames			
TITLE Photograph Record Sheet			
		18 Parkside Hill M London SE1 0207742101 0207742102 0207742103	
		T: 0207742102 F: 0207742103 info@aae.co.uk www.aae.co.uk	
Date	Date	Version	Rev.
NTS	05.08.20	GAAR	
	JDT	ARB	20014001

TOOLBOX TALK: BATS

Did you know?

- Bats are the world's only flying mammal.
- There are 17 species of bat known to be breeding in the UK, 6 of which are endangered or rare and 6 are classed as vulnerable.
- Bats can be found across the country in urban and rural locations.
- They are often sighted at dusk as they leave their roost, flying around hedgerows, woodland and waterbodies, feeding on insects.
- Throughout the year bats will often change their roost, depending upon the season.
- Usually a pregnant female will only have one baby a year, this makes colonies vulnerable to population decline.
- During the winter bats hibernate and may not wake up, even if disturbed. Therefore it's important not to work on sites with bats during these months.
- Bats may not use the same roost throughout the year, however they are legally protected with or without a bat occupying them.

Identification

- You may find bats in any number of places, they tend to prefer dark, quiet spots with good shelter, such as holes and cracks in trees, roofs and walls of buildings, under bridges, old tunnels and in caves.
- Signs of bat presence include discarded moth wings, staining around crevices and small mouse like droppings which crumble easily.

Legislation

- All bats and their roosts are protected by UK and European Law. This makes it **illegal to kill, injure, capture or disturb** bats or obstruct access to, damage or destroy their roosts and protects important feeding areas from damage or disturbance.
- Under law, a roost is any structure or place used for shelter or protection.
- Breaking the law can lead to fines of up to £2,000 per bat and/or 6 months in prison.

Site Controls

- There is always a **risk** that bats, as they move between different roost sites and occupy new roosts, could be encountered during site works.
- **If any bats are encountered during works the following controls must be applied to avoid breaking the law:**
 1. If bats are discovered/suspected works must stop **immediately** with any bat left in-situ and AAe immediately contacted (contact details above).
 2. If any injured bats are found during the works AAe would care for them and where possible be released in the same location once recovered.
 3. During works staff must wear gloves in case of accidental contact with bats.
 4. Any Potential Roosting Features (PRF's) (split/loose bark, rot holes or woodpecker holes) must be fully checked for any bats or their evidence prior to tree felling.
 5. If no evidence of bats is recorded, trees should be felled in manageable sections, avoiding cross-cutting in proximity to cavities or hollows and lowered to the ground, minimising the risk of harming bats which may be sheltering within.
 6. Any lighting must be installed must avoid illuminating vegetation and or bat boxes/access points.

These controls have been put in place to protect all site operatives from breaking the law. You're not expected to be able to identify bats or their presence so remember, **if in doubt shout and contact the relevant person.**

Key Contact

AA Environmental Ltd, Units 4-8 Cholswell Court, Shippon, Oxfordshire, OX13 6HX
Tel: 01235 536042



Brown long-eared bat



Lesser horseshoe bat in rail tunnel



Common pipistrelle bat

**COUNCILLORS ARE HEREBY INVITED TO
ATTEND A MEETING OF THE
NEIGHBOURHOOD PLAN COMMITTEE**

to be held on

**MONDAY 1 MARCH 2021 AT
3PM**

online at

**zoom.us (or via your device app)
Meeting ID: 827 6755 8867**



Sheridan Jacklin-Edward
Town
Clerk 23rd
February 2021

MEMBERSHIP: Chair, Councillor Ken Arlett – Henley Town Council
(HTC) Vice Chair, Councillor Laurence Plant – HTC
Councillor Ian Clark – HTC
Councillor Glen Lambert – HTC
Councillor Michelle Thomas – HTC
Councillor Kester George – Harpsden Parish Council (HPC)
Councillor Sara Langton –HPC
Don Barraclough
Rebecca Chandler-Wilde
Joan Clark
Patrick Fleming
Geoff Lockett
Jim Munro
Jackie Walker
David Whitehead

**MEETING OF THE NEIGHBOURHOOD PLAN
COMMITTEE 1 MARCH 2021 AT 3PM
AGENDA**

- | | Pages |
|---|--------------|
| 1 APOLOGIES FOR ABSENCE
To receive and consider for acceptance apologies for absence. | |
| 2 DECLARATIONS OF INTEREST
To receive any interests relating to the business to be transacted at the meeting. | |
| 3 PUBLIC PARTICIPATION
To receive questions and comments from members of the public on any items included on the agenda. NB: attention is drawn to the Council's Public Participation Scheme attached.

To participate: email j.rhymes@henleytowncouncil.gov.uk for the meeting password

To attend but not speak: view a live stream of the meeting via the link on our homepage: www.henleytowncouncil.gov.uk . | |
| 4 NOTES
To approve the Notes of the Neighbourhood Plan Committee meeting held on 25 January 2021 (attached). | 5-8 |
| 5 UPDATE FROM PLANNING OFFICER
To receive an update on progress since the last meeting. | |
| 6 UPDATES FROM WORKING GROUPS
To receive any updates since the last Neighbourhood Plan Committee meeting: <ul style="list-style-type: none">i) Schools, Colleges, Doctors' Surgeries, Utilities etc. (<i>Rebecca Chandler-Wilde and Councillor Michelle Thomas</i>)ii) Libraries, Community Halls, Sports and Leisure Facilities (<i>Joan Clark</i>)<ul style="list-style-type: none">• To consider the Libraries, Community Halls, Indoor and Outdoor Sports facilities Topic Paper.iii) Transport (<i>Patrick Fleming, Don Barraclough, Geoff Lockett, Councillor Kester George, Jackie Walker</i>)iv) Car Parks (<i>Councillor Ken Arlett and Geoff Lockett</i>)v) New Housing, Permitted Development Rights since March 2017 (<i>David</i>) | 9-19 |

Whitehead, Rebecca Chandler Wilde, Councillor Kester George and Councillor Michelle Thomas)

- vi) Business and Community Engagement (*Rebecca Chandler-Wilde, Jackie Walker, Patrick Fleming and Councillor Ken Arlett*)
- vii) Liaison with other Parishes carrying out NP Reviews (*Patrick Fleming, Councillor Ken Arlett, Cath Adams*)
- viii) Review all existing sites (*Councillor Ken Arlett, Councillor Kester George, Councillor Ian Clark*)
- ix) Industrial Land (*Councillor Ken Arlett, Councillor Ian Clark, Councillor Sara Langton*)
- x) Site Selection (*Councillor Ken Arlett, Councillor Kester George, Councillor Michelle Thomas and Joan Clark*)
- xi) Conservation Area Review and Local List (Heritage Sites) (*Jodie Rhymes*)
- xii) Climate Emergency 2030 (*Councillor Ken Arlett, Rebecca Chandler-Wilde, Patrick Fleming and Jackie Walker*)

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|-----------|--|--------------|
| 7 | LOCAL GREEN SPACE DESIGNATIONS METHODOLOGY
To consider the Local Green Space methodology to be used when determining Local Green Space Designations for the Neighbourhood Plan (Document Attached) | 21-39 |
| 8 | BUDGET EXPENDITURE FOR NEIGHBOURHOOD PLAN REVIEW
To note the budget expenditure for the Neighbourhood Plan Review (document attached). | 41-43 |
| 9 | GOVERNMENT CONSULTATION – CHANGES TO NATIONAL PLANNING POLICY FRAMEWORK AND NATIONAL MODEL DESIGN CODES
To consider the consultation from Central Government on the proposed changes to the National Planning Policy Framework and National Model Design Code. | |
| 10 | PUBLIC EXHIBITIONS
To reconsider the exhibition of sites currently planned for 9 and 10 April 2021. | |
| 11 | NEXT STEPS
To consider next steps for taking forward the Neighbourhood Plan review. | |
| 12 | NEXT MEETING
To consider a date for the next meeting of the Neighbourhood Plan Committee. | |

Henley-on-Thames Town Council

Public Participation Scheme

The Council will set aside a period at the commencement of each meeting when members of the public can ask questions or make statements. The following rules shall apply:

1. This scheme applies to meetings of the Council, its committees, and sub-committees.
2. There will be a Public Participation Session at the start of every meeting to which this scheme applies. At Full Council, members of the public, including Councillors who may have a personal and Pecuniary interest on any item included on the agenda, may ask questions or make a statement on any matter which affects the town. The session will last for a period of up to 20 minutes (but capable of being extended at the Chairman's discretion).
3. Members of the public may ask questions or make a statement on any item included on the agenda. The session, which is also open to Councillors who may have a personal and prejudicial interest on any item included on the agenda.
4. Questions from the town's residents will take priority, followed by property owners, businesses and then non-residents.
5. All speeches shall last for no more than 2 to 3 minutes.
6. If there are no statements or questions, or if all statements have been made or questions asked before the period of time allotted, the meeting will start to consider the remainder of its business. No further public questions or statements will be entertained at that meeting.
7. If an answer to a question cannot be given at the meeting the Chairman may, at his/her discretion, arrange for a written answer to be given.
8. The Chairman of the meeting will have complete discretion as to the order in which questions are taken and statements made. Supplementary questions may be asked at the Chairman's discretion.
9. The Chairman of the meeting may rule that any public remarks are not appropriate and will not be accepted; for example if they are defamatory, frivolous or offensive. In such an instance the Chairman may disallow a question or statement or cut short a statement or discussion, or disqualify any member of the public from continuing to speak.
10. Questions which require the disclosure of exempt or confidential information will not be answered.
11. The Chairman of the meeting's interpretation of this procedure shall not be questioned and his/her ruling on any questions relating to this procedure shall be final.



**NOTES FROM A MEETING OF THE
NEIGHBOURHOOD PLAN
COMMITTEE HELD AT 3:00PM ON
MONDAY 25 JANUARY
2021 ONLINE VIA
ZOOM.US**

Present: Chair, Councillor Ken Arlett – Henley Town Council
(HTC) Councillor Michelle Thomas – Henley Town
Council (HTC) Councillor Kester George – Harpsden
Parish Council (HPC) Councillor Sara Langton –
Harpsden Parish Council (HPC) Don Barraclough
Rebecca Chandler-Wilde
Joan Clark
Patrick Fleming
Geoff Lockett
Jim Munro
Jackie Walker
David Whitehead

In attendance: Cath Adams – Deputy Clerk/Planning and Project Manager
Jodie Rhymes – Planning Officer

56. APOLOGIES FOR ABSENCE

No apologies for absence had been received.

57. DECLARATIONS OF INTEREST

There were no declarations of interest.

58. PUBLIC PARTICIPATION

None.

59. NOTES

RESOLVED: to approve the Notes from the meeting held on 7 December 2021.

60. UPDATE FROM PLANNING OFFICER

The Planning Officer delivered a verbal update on progress:

- Work had been progressing on draft policies and a meeting with SODC and OCC had been helpful for moving transport and climate emergency policies forward.
- AECOM were providing support for policy intentions and for the evidence base. They are working on 15 policies.

Signature: _____ Date: _____

- The Neighbourhood Plan survey is live and the closing date has been extended to 1 February. Further flyers are being distributed to households raise awareness.
- Due to the restrictions surrounding the Covid 19 pandemic, it had been decided to defer the public exhibition for sites and draft policies until 9th and 10th April.

61. UPDATES FROM WORKING GROUPS

- i) **Schools, Colleges, Doctors' Surgeries, Utilities etc.** - *Rebecca Chandler-Wilde and Councillor Michelle Thomas*
No update.
- ii) **Libraries, Community Halls, Sports and Leisure Facilities** – *Joan Clark*
It was confirmed that if updated details could be provided by the next meeting, these would enable drafting of policies in time for the public exhibition.
- iii) **Transport** - *Patrick Fleming, Don Barraclough, Geoff Luckett, Councillor Kester George, Jackie Walker*
Policies have been sent to AECOM for review and only two are outstanding - EV charging and travel plans.
- iv) **Car Parks** - *Councillor Ken Arlett and Geoff Luckett*
Councillor Arlett confirmed that he would include long stay car parks in his research. On street parking was also suggested as a consideration. The Planning Officer and Patrick Fleming to decide whether this falls best under Transport or Car Parks.
- v) **New Housing, Permitted Development Rights since March 2017** – *David Whitehead, Rebecca Chandler Wilde, Councillor Kester George and Councillor Michelle Thomas*
David Whitehead provided an update on the latest housing figures. Numbers demonstrate that the requirement from the JHHNP and the additional requirement in the SODC Local Plan 2035 was likely to be met by the time the Neighbourhood Plan Review was ready for public consultation. The Planning Officer stated that numbers were continually being updated and that it was likely to be necessary to provide housing to accommodate affordable housing provision in accordance with the Local Plan.
- vi) **Business and Community Engagement** – *Rebecca Chandler-Wilde, Jackie Walker, Patrick Fleming and Councillor Ken Arlett*
The Planning Officer stated that the survey should mean that the Committee would be in a good position to review the vision and objectives at the next meeting. The public exhibition is now planned for April.

Signature: _____ Date: _____

- vii) **Liaison with other Parishes carrying out NP Reviews** – *Patrick Fleming, Councillor Ken Arlett, Cath Adams*
Members of the Committee are meeting Thame Town Council on Tuesday 26 January to gain insights into what is involved in setting up a Community Land Trust. Information will be brought back to the Committee.
- viii) **Review all existing sites** - *Councillor Ken Arlett, Councillor Kester George, Councillor Ian Clark*
No update.
- ix) **Industrial Land** – *Councillor Ken Arlett, Councillor Ian Clark, Councillor Sara Langton*
The Chairman stated that 1 hectare is still a requirement in the Local Plan and to date land for this has only been offered by the Northern Field site at Highlands Farm.
- x) **Site Selection** – *Councillor Ken Arlett, Councillor Kester George, Councillor Michelle Thomas and Joan Clark*
This is dependent on the public meeting planned for 9th and 10th April 2021.
- xi) **Conservation Area Review and Local List (Heritage Sites)** – *Jodie Rhymes*
The Planning Officer reported that Purcell had been delayed on the start of work on the Conservation Area Character Appraisal due to the Covid 19 restrictions. Work was now planned to start in February and it was hoped that information would be ready for the public exhibition in April.
- xii) **Climate Emergency 2030 Working Group** – *Councillor Ken Arlett, Patrick Fleming, Rebecca Chandler-Wilde and Jackie Walker*
Policies for this were under review.

62. OXFORDSHIRE NEIGHBOURHOOD PLANS ALLIANCE (ONPA)

Patrick Fleming stated that the ONPA webinar on climate emergency and sustainability policies held on 20 January had been well received and provided useful insight into selection of examiners for Neighbourhood Plans.

63. PROJECT TIMELINE

The Committee noted the revised project timeline. This had been impacted by the Covid 19 restrictions and submission to SODC was now planned for November 2021. This would align with the need to have allocated sites for development within a year of the adoption of the SODC Local Plan.

Signature: _____ Date: _____

64. GOVERNMENT PLANNING GUIDANCE – CHANGES TO PERMITTED DEVELOPMENT RIGHTS

The Planning Officer summarised the main proposals. Points included the expansion of the range of change of use possible under permitted development rights, the removal of floorspace limits, ability for public infrastructure such as hospitals and schools to be able to expand without planning permission and the reduction of the consultation period for planning applications from 21 days to 14 days. This would have a big impact on consultees being able to return responses in time. Members of the Committee were asked to complete the pro-forma for responses and return these to the Planning Officer for amalgamation and return to Central Government by 28th January 2021.

65. NEXT STEPS

To continue working on the Topic Papers and policies, together with the vision and objectives. Results from the survey to be reviewed. The results of the AECOM policy review to be shared with the Working Groups.

66. NEXT MEETING

The next meeting of the Neighbourhood Plan Committee will be held on 1st March 2021 at 3pm.

The meeting closed at 3.59pm

Signature: _____ Date: _____

TOPIC PAPER: Infrastructure *Draft 4: February 2021***Libraries, Community Halls, Indoor and Outdoor Sports facilities****INTRODUCTION:**

The Joint Henley and Harpsden Neighbourhood Plan (JHHNP) came into force in April 2016. Following revised housing figures in the South Oxfordshire District Council's Emerging Local Plan it became apparent that the plan needed review. Part of the drive behind the review is to establish the infrastructure provision in Henley and Harpsden. This topic paper contributes to this research into evidence.

VISION FOR HENLEY AND HARPSDEN FROM THE CURRENT JHHNP:

In 20 years' time, Henley on Thames and the surrounding village of Harpsden will be a sophisticated, vibrant and prosperous area with expanded infrastructure. It will value its community, its business and retail capabilities, its sports, arts and festivals, providing people with a supportive and sustainable environment where people can live, work, rest and play. Pedestrians and cyclists will feel safe and traffic will be managed to minimise its impact. There will be a range of jobs and housing to support and maximise choices for residents, and excellent public services across education, healthcare and leisure for all residents. The historic character, green environment and the river will continue to be protected and cherished.

TOPIC AREA:

The topic paper will cover Libraries, Community Halls, Indoor and Outdoor Sports facilities under the following headings:

- Research carried out
- Current situation
- Areas of concern

Consideration will be given to how any proposed policies compare against National Planning Policy, and Local Plan.

Social Infrastructure vision: primary objectives JHHNP 2016

The social infrastructure vision, as set out in the JHHNP of 2016 remains essentially unchanged. The revised primary objective relevant to this topic paper is SO2 in the original JHHNP: *to maximise leisure opportunities for all ages identifying mechanisms for delivering new and improved facilities in appropriate locations to meet demand.*

Strategy

The strategic objective in the original JHHNP remains essentially unchanged: *contributions will be sought for new recreation and community facilities to mitigate the impact of increased population. Some will be delivered on site (Highlands Farm) in other cases pooled resources will be used to create new facilities or to renew and enhance existing community facilities*

JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN REVIEW

New residential development will be required to provide or contribute towards inclusive and accessible open space and play facilities having regard to the most up to date standards set out in the Open Spaces Study including:

- Amenity greenspace (including parks and gardens)
- Allotments
- Equipped children's play areas

1. Research carried out

A survey of existing facilities was carried out.

Note was taken of the recommendations in the *SODC Draft Sports Facilities, Local Leisure Facilities and Playing Pitch* studies prepared by Nortoft partnership in December 2018.

1. Current Situation

1.1. Library

Henley has a well-used public library run by Oxfordshire County Council situated in a convenient central location. It offers the following services and facilities:

- Books in a variety of formats
- Newspapers and magazines
- Books in other languages
- Audio books
- eBooks and eAudio
- DVDs
- Free Wi-Fi
- Music CDs - Music library
- Computers and Internet
- Local studies collection
- Bus pass, Blue Badge, resident parking validation services and EU settled status assisted service.
- A3/A4 printing and copying
- Bookable Digital helper sessions

It also offers regular *Rhymetime* sessions for parents, carers and children and *Knit and natter* sessions for all.

Staff plan and schedule activity sessions based on community interest. Bookings are recommended for some sessions e.g. digital helpers. Feedback from Henley Library customers indicates that the Library serves its customers well.

The Library Service uses a range of demographic data and projections to map the impact of the growth Plan across the service. As part of the strategic and business planning the Library service will review its service provision in the coming months to ensure that they are prepared and will provide a relevant community service in response to the extra houses being built in the current and revised JHHNP and the wider Oxfordshire growth Plan over the next 10-15 years. Library staff regard their role as ensuring they remain relevant to the communities they serve.

The SODC Infrastructure Delivery Plan, part A 2017 states that there are currently no shortfalls in provision.

1.2. Community Halls

- There are a number of community halls in the 2 parishes. There are also sports clubs and churches that hire out rooms for private or group functions when they are not required by the club or church.

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- Community facilities for meetings include Town Hall rooms, King's Arms Barn meetings room, Old Fire Station Gallery, The Pavilion (owned by Henley town council), Harpsden Village Hall, TA Centre, Over Sixties Social Club. Most of the facilities are currently closed, or running on line, owing to Covid restrictions.
- The Town Hall has a large hall with space for 200 people, a Council Chamber for up to 60 people and a committee room for smaller meetings.
- Harpsden Hall, overseen by the *John Hodges Trust*, has a main hall, a small meetings room and a kitchen. The playing fields next to the hall have a football pitch and a cricket ground.
- The Over 60's club is a social club for people over 60. They run a range of activities and services and provide meals 3 days a week.
- Several local churches have halls that can be used by the wider community including St. Mary's grade 1 listed Chantry House, the Christchurch Centre, with a range of different sized rooms, Henley Baptists' Church, Sacred Heart Parish Hall.
- The Chantry House is used as a church hall with a variety of activities and is also available for hire.
- The Christ Church Centre has a range of rooms for activities or hire. A number of groups meet there providing support for older people, families, carers and people with health issues. The Centre also runs a range of sports and cultural activities and classes.
- Henley Baptist Church runs dTwo, a community centre which has a family centre, a community café and bookshop, a youth and community project and the Nomad Food Bank. Rooms are available for hire.
- Rooms can also be hired from Sports Clubs, the YMCA and other private organisations and clubs such as Badgemore Golf Club, the Salisbury Club and Phyllis Court.

1.3. Indoor and outdoor Sports Facilities

The two parishes have a number of sports clubs with indoor and outdoor sports facilities. All of these facilities are currently closed, owing to Covid restrictions, but some fitness centres continue to offer on-line exercise classes.

The Henley Leisure Centre: Henley Leisure Centre offers the local community a large range of facilities including a 50 station gym, 25m swimming pool, separate cycling and fitness class studio with over 20 classes per week, 4 court badminton hall, 2 squash courts, children's swimming lessons, martial arts and 5 a side football. The gym at Henley Leisure Centre has recently received new gym equipment, which includes: treadmills; Excite Bikes; Concept 2 Rowers; Synchro X-trainers; dumbbells up to 38kg; Multipower Smith Machine. The fully equipped, air-conditioned gym offers a range of fitness equipment for everyone with cardiovascular machines, resistance equipment, dedicated stretching areas and fitness aids. Fitness programme tailored to individual needs can be put together by a *Better Fitness* instructor. A range of fitness classes is offered including Total Body Conditioning, Core Stability, Pilates, Yoga, Tai Chi, Boxfit, Group Cycle Circuits, Water Workout, Dance Aerobics, Strength & Conditioning. However, with the Covid restrictions in place during lockdown) the class timetable has had to be decreased. It is expected that this will only be a short term change until restrictions are lifted.

Swimming

The swimming pool is 25 metres long, with 4 lanes and a changing village located next to the pool side. Swim fit sessions are laned pool sessions with options of slow, medium and fast pace. Fun sessions are float mat sessions aimed at children under the age of 16. A

JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN REVIEW

changing facility for disabled users, including adjustable height changing bed and hoist is available. The Centre provides: fully qualified teachers. Lesson plans are designed in accordance with the ASA Learn to Swim Framework. There are free-swimming sessions. . The swimming pool normally operates at close to 70% capacity (classed as busy).

The Studios: The studio hosts 8 classes a week; cardio, circuits, dance, cycling and yoga are offered. Personal trainers are available providing exercise programmes for all areas of general fitness.

Racquet sports: The Centre has 4 Badminton and 2 Squash courts. Racketball can also be played on the squash courts. The Leisure Centre is host to the Henley Squash and Racketball Club, with internal leagues & ladders and matches against other clubs in Oxfordshire & Berkshire. The SODC draft report states that there is a surplus supply of squash courts in the local area. The SODC draft report states that there is sufficient provision of badminton courts in the area and that the priority is improvement of existing facilities to improve attractiveness and accessibility.

Jubilee Park:

Following public consultation in the summer of 2019, Henley Town Council is proceeding with plans for the construction of a new clubhouse, a 3G pitch and rearranged grass pitches on Jubilee Park, financed by the sale of land at 353-357 Reading Road for residential and retail development. The site is managed by Henley Town Council.

Facilities include an all-weather pitch laid in 2011 with artificial rhinoturf, a 4 lane running track, changing rooms with showers and car parking. The pitch is suitable for hockey, football, athletics, rugby and fitness training. It is home to Henley Hockey Club and is used by AFC Henley local schools and organisations.

Football:

Henley AFC: offer football for boys and girls from 4 to 18, and, in partnership with Henley Town Football Club and Henley YMCA, onward progression to adult teams.

Facilities include:

- Five pitches at Jubilee Park.
- A full-sized pitch in the village of Harpsden
- Access to Henley YMCA's pitch in Lawson Road
- Access to the Rhinoturf at Jubilee Park Henley for training
- Access to Henley Town's men's pitch in Mill Lane

Activities include:

- Saturday morning Mini-Soccer Centre for under 5 to under 8
 - Midweek Mini/Junior Soccer Centres
 - Midweek Player Development centres (by invitation)
 - Competitive league football for under 9 to under 18
 - Football for adults at Henley Town Football Club
 - Football for adults with learning disabilities at Henley YMCA
 - After School Clubs
 - Holiday soccer camps
 - Football parties
- AFC Henley is affiliated to Oxfordshire Football Association (OFA)

Henley Town Football Club was founded in 1871 and is the oldest club recognised by the Oxfordshire Football Association. They currently have teams in the Thames Valley League and Reading and District Sunday League and are working with AFC Henley to promote local boys' progression into adult football.

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Rugby

Henley Hawks is a rugby union club. The first team play in the fourth tier of the English league system. The ground has a capacity of 4000, a range of pitches, a wonderful new 4G training facility and a large refurbished clubhouse at Dry Leas. The ground is leased from the Town Council with the unexpired portion being nearly fifty years. Henley RFC have developed a close working relationship with Ealing RFC and Henley College for player development with loan players and a pathway from the college into adult community rugby.. As well as the first team the club has 4 other men's squads, a strong women's section with two sides and a girls' development squad and three community sides. There is a large *Kids First* and *Juniors* section with teams ranging from under 6 to under 16.

Hockey

Henley Hockey Club was founded in 1952.

- They use the Rhino Turf pitch at Jubilee Park.
- They have 6 men's teams and 3 women's teams who play matches throughout the season
- There is an Academy for children with teams for boys and girls from under 6 to under 16. This equates to about 250 children
- All training uses qualified coaches.
- Qualified 'First Aiders' are present at all games
- HHC is affiliated to *England Hockey*
- HHC has sponsors and regularly uses its facilities for non-hockey events – cultural events, slimming club, etc.
- HHC has fully trained and tested umpires
- HHC arranges many social events throughout the year
- HHC offer a *Return to Hockey* facility
- HHC is an amateur club with all members paying for hockey and/or social functions
- HHC is a PLC. It has 3 plc Directors and a committee. Activities are reviewed and advised upon by non-executive directors.

Cricket

Henley Cricket Club play on Brakespear's ground on the south side of the river, which they have bought. They have built a new pavilion. The Club runs three Saturday League sides competing in the Home Counties Premier League and Thames Valley Cricket League, a Sunday XI, a thriving and successful junior section for both boys and girls and a Ladies team. The main ground is regularly used for Berkshire Minor Counties matches.

Harpsden Cricket Club, founded in 1807, play on their grounds in the Harpsden Valley. They have 2 Saturday league sides and an active junior section.

Tennis

Henley Tennis Club has courts next to The Henley College sports field. The courts were originally built by *The Henley College* but fell into disrepair and became unusable. Now the courts have been leased to the club and have been refurbished. Players of all ages and abilities are welcomed and the club runs coaching programmes for adults or juniors. Courts operate at close to capacity but the club feel that they are not meeting the demand for the area as their facilities are not of the quality of tennis clubs outside of Henley so players have to go elsewhere to get the good facilities they need. The club does not have floodlighting, any covered courts or a good clubhouse. In certain weather conditions the surface of the courts is not good enough for them to be used. The Club applied to SODC in July 2020 for planning permission to install lighting on two of their courts.

The club would like to have stronger links with local schools, to raise its profile in the community and boost membership so that they can provide more free access and discounts for local people. To meet the increased demands from new households the club would need to provide more courts, covered or indoor facilities and a bigger clubhouse.

Rowing and river activities

Although most of the facilities for rowing are on the Berkshire bank of the river, so outside the parishes of Henley and Harpsden, their activities are closely associated with Henley.

The Eyot centre:

The Eyot Centre is a community centre situated on the Berkshire bank of the River Thames just 300m from Henley Bridge. It is also the home of *The Henley Canoe Club* and *The Henley Dragon Boat Club* and is directly licensed centre for the Duke of Edinburgh Awards. The Eyot Centre is a registered charity which seeks to provide access to social and river based leisure activities primarily to the young people of Henley and surrounding areas.

It offers: leadership and facilities for the local community to engage in regular paddle sport activities; adventure weeks/weekends combining camping, hiking and paddle sports for local schools, colleges, youth groups and Duke of Edinburgh's Award participants; coaching and training to individuals wishing to gain recognised qualifications in paddle sports activities; fun and sporting challenges to disadvantaged groups to aid their self-development and team-building skills.

Leander Club: Founded in 1818, Leander Club boasts an unsurpassed record in rowing achievements. It is home to heroes such as Sir Steve Redgrave CBE, and Sir Matthew Pinsent CBE, triple gold medallist Peter Reed OBE, and double gold medallists James Cracknell OBE, Steve Williams OBE, and Alex Gregory MBE, as well as the champions of tomorrow. Leander is a private Members' club. The Leander Academy aims to attract and develop young oarsmen and women with high-potential. The High Performance Programme is recognised and supported by the GB Rowing Team and funded through the National Lottery. The Club is currently closed but is providing members with on-line fitness classes.

The Henley Rowing Club: founded in 1839, provides rowing and sculling for adults and juniors. Both *Learn to Row* courses and private tuition aimed at adults and juniors who have never rowed before are offered. The club has Junior, Senior and Masters' squads for men and for women. Courses are run by experienced rowers/coaches and cover many different aspects of rowing including gym work, rowing on the water, using rowing machines and learning how to handle boats and rowing equipment carefully. The club also runs Junior Summer Camps. All facilities are currently closed until further notice.

Upper Thames Rowing Club: established in 1963 the club has senior, veterans and junior squads and runs training courses. The clubhouse includes a gymnasium. In accordance with the latest Government's Coronavirus restrictions and following the advice from British Rowing, UTRC have issued new arrangements to members to allow sculling in private and club boats.

Golf

Badgemore golf club: founded in 1972 the club has an 18 holes course and a large clubhouse which can be booked for private functions. FOCUS, a gym and fitness club was opened in 2018 and prior to Covid restrictions ran 28 classes a week. Some of these continue on-line.

Henley golf club: situated in the Harpsden valley the club, which was founded in 1907, has an 18 holes course and a clubhouse which is being extended.

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Future golf provision is likely to be provided by the commercial sector and therefore will respond to demand.

Bowling

Henley-on-Thames Bowling Club: the club caters for both competitive and social bowlers and offers coaching sessions. Members play in league games, friendlies and internal competitions. They are based at The Pavilion in Mill Meadows Riverside Park.

Phyllis Court private club

The Club has facilities for bowls, croquet, tennis, a rowing club and a new indoor sports centre for members plus several meeting rooms and restaurants. All facilities at the Club are currently closed owing to Covid restrictions.

Private gyms and fitness studios

Although LA Fitness and Urban Space have closed, new fitness centres opened recently: *Love Fitness* at the Henley Rugby Club, *FOCUS* at Badgemore Park, a Fitness Centre at Phyllis Court, *Fitness Space* on the Centenary Business Park with others under discussion. There are a number other smaller private fitness centres and others in sports clubs. The *Red Lion Hotel* massage and fitness rooms are currently closed as the hotel is under new management and is undergoing major refurbishment. All of these fitness centres are currently closed owing to Covid restrictions, though some are offering on-line classes.

Parks and recreation areas

Henley has an extensive park/ recreational area alongside the River Thames. At the town end (**Mill Meadows**) there are 2 recently refurbished children's playgrounds, one for younger and one for older children. There is a bowling green and a space that has been used as a putting green and is being considered for conversion to as mini golf course. Public toilets are available in the Leichlingen pavilion. There is a bandstand in an open meadow area alongside the river. A walk along the tow path leads to **Marsh Meadows**, another open area for walks and picnics. **The River and Rowing Museum** has a range of attractions, a café, wild life walks and meetings rooms that can be hired out.

Freeman's Meadow is an open recreational area off the Fair Mile. It has a recently refurbished children's play area.

Makins Recreational Ground is an open recreational area off Greys Road. There is a recently refurbished children's playground, an adult outdoor gym and a new skateboard area (currently closed owing to Covid restrictions).

Changes since the publication of the JHHNP in 2016

Since the 2016 JHHNP a number of changes to facilities in the town have occurred.

- The Youth centre in Deanfield Avenue has been demolished and the land designated for housing, as set out in the 2016 JHHNP.
- The skate park in Makins Recreational Area alongside Greys Road has been substantially redesigned and upgraded.
- Children's Play areas have been refurbished and new equipment installed.

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- Some new adult outdoor exercise equipment has been installed in this recreational area.
- A new community / sports hall is scheduled to be built by the developer, Crest Nicholson, as part of the housing development at Highlands Farm

Areas of concern

- Covid restrictions in 2020 have led to closures of most of the leisure and recreational facilities in Henley and Harpsden. At the time of writing it is not known when they will be able to re-open. Some fitness centres are offering classes via Zoom. Clearly the closures have affected income streams and it is possible that some facilities may not be able to reopen. Certainly plans for development are on hold and will need to be reviewed when facilities are allowed to reopen and their future is clearer.
- The SODC Infrastructure delivery Plan part A, 2017 notes that facilities in Henley are under some pressure and there is relatively limited scope for further increase. There is a shortage of land for new facilities within the parishes which can only be exacerbated with the growth in population.
- Assuming that all of the gyms and fitness centres reopen once Covid restrictions are lifted, there appears to be sufficient provision to meet current needs. Much of it is in the private sector or associated with sports clubs so it could probably be expanded to meet future needs. The problem is the price of membership puts the facilities out of the reach of many local people.
- New legal requirements for clubs such as safeguarding, finance, insurance, training, coaching, data protection have placed a burden on volunteers and fewer people are willing to come forward to take on responsibilities for running clubs. People are keen to join in and help but reluctant to take on more onerous legally required duties and responsibilities.
- The SODC Infrastructure delivery Plan part A, 2017 notes that football is short of pitches and a 3G pitch is needed somewhere in the parish. Henley Hockey Club needs a second astroturf pitch. Henley Cricket Club have needed to go outside the parishes for suitable grounds to meet the demands of their members. Several clubs are improving or looking to improve their clubhouses and facilities. .
- The SODC Draft sports, leisure and playing pitch studies identifies a need to review the use and demand for athletics training facilities at Jubilee Park. This demand is likely to increase with the additional number of households planned.
- A need is identified in the SODC draft study to ensure the Jubilee Park's proposed replacement changing provisions for football and hockey meets the needs of the clubs, is appropriate for the site and does not impact on pitch provision.
- Improvement to the changing facilities on the main Henley rugby site and basic wash facilities for the Regatta site are recommended in the draft SODC study.
- A need to explore opportunities to develop additional rugby pitches particularly for mini and junior use is also identified.
- An urgent need for 1 full size hockey surface pitch in the Henley area is recognised in the SODC draft study but a potential site has not been identified.

JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN REVIEW

- Need to improve capacity at existing tennis courts by providing floodlighting, more courts, some of which should be covered and a bigger clubhouse. The Tennis Club has been losing members (down from 430 two years ago to 250 in 2019) because of the inadequate and deteriorating facilities.
- Existing lease on tennis courts (from the Henley College) has only 12 years to run and contains a buy-back clause that the College could exercise in 2 years' time. The threat of a possible buy-back means that money spent improving facilities could be lost if the buy-back is exercised. Should the buy-back be exercised the Club would have no home.
- Priority identified in SODC Draft report is the improvement of existing swimming facilities at the Leisure Centre.
- Highlands Farm sports / community centre: as yet it has not been possible to find an organisation willing to take responsibility for the management of the Highlands Farm sports and community centre. It is hoped that eventually the management and associated costs will be taken over by residents of the estate. However, until the estate is fully occupied and a residents' association organisation is set up, interim arrangements for maintenance and management are needed.

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Report subject	Libraries, Community Halls, Indoor and Outdoor Sports facilities Topic Paper
Committee name	Neighbourhood Plan Committee
Meeting date	1 March 2021
Report author	Jodie Rhymes / Planning Officer
Report contact details	j.rhymes@henleytowncouncil.gov.uk

1. Executive summary

1.1. In order to ensure that the Neighbourhood Plan delivers sustainable communities, the infrastructure, facilities and services needs of the population must be properly planned for. This Topic Paper forms parts of a wider strategy for infrastructure and will be used to inform future development and provide evidence to support the preparation of Joint Henley and Harpsden Neighbourhood Plan.

1.2. The Neighbourhood Plan Committee (NPC) will publish a series of background papers to accompany the Neighbourhood Plan preparation. These cover a range of issues and provide more technical or detailed information than is contained in the Plan itself. They also provide links to the various published sources of evidence.

1.3. This topic paper brings together all of the information for Libraries, Community Halls, Indoor and Outdoor Sports facilities.

2. Background information

2.1. What is infrastructure?

2.2. Infrastructure, in planning terms, can be defined as 'any facility, service or physical structure that supports or enables proposed development, whether privately or publically funded'. The three main categories are :

2.3. Physical infrastructure – e.g. utilities (i.e. water supply and waste water, gas, electricity, telecommunications and digital communications) and transport infrastructure and transport services;

2.4. Environmental and Green infrastructure – e.g. flood protection, public realm, public open space, green space, parks and play space, and waste management;

2.5. Social infrastructure – e.g. education, health, social care, the emergency services, community facilities, arts and culture, sport and recreational facilities, and community facilities.

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3. Detailed consideration

3.1. This Topic Paper sets out the baseline position for leisure and sports facilities within Henley and Harpsden. This information was based on a survey of existing facilities and also information taken from the recommendations in the SODC Draft Sports Facilities, Local Leisure Facilities and Playing Pitch studies prepared by Nortoft partnership in December 2018.

3.2. The social infrastructure vision, as set out in the JHHNDP of 2016 remains essentially unchanged. The revised primary objective relevant to this topic paper is SO2 in the original JHHNP: to maximise leisure opportunities for all ages identifying mechanisms for delivering new and improved facilities in appropriate locations to meet demand.

3.3. The strategic objective in the original JHHNP remains essentially unchanged: contributions will be sought for new recreation and community facilities to mitigate the impact of increased population. Some will be delivered on site in other cases pooled resources will be used to create new facilities or to renew and enhance existing community facilities.

3.4. New residential development will be required to provide or contribute towards inclusive and accessible open space and play facilities having regard to the most up to date standards set out in the Open Spaces Study including: ☐ Amenity greenspace (including parks and gardens) ☐ Allotments ☐ Equipped children's play areas

3.5. Moving Forward

3.6. This document has been written to accompany the consultation of the draft JHHNP. The next stage will look at specific projects and actions from this paper.

4. Impact assessment

4.1. The Town Council has a statutory duty to consider the effects of its decisions on biodiversity, and crime and disorder in the area. As the Council has also declared a climate emergency, this should also be considered.

- (a) Biodiversity
- (b) Crime and disorder
- (c) Climate emergency

5. Recommendation

5.1. It is recommended that the Committee **RESOLVES** that:

The Topic Paper: Libraries, Community Halls, Indoor and Outdoor Sports facilities is taken forward as evidence to support the revised Joint Henley and Harpsden Neighbourhood Plan.

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Joint Henley and Harpsden Neighbourhood Plan

2020-2035

Topic Paper

Local Green Space Methodology

February 2021

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1. Disclaimer

- 1.1. This document is intended to aid the preparation of the Henley and Harpsden Neighbourhood Plan and to support the writing of corresponding Neighbourhood Plan policies.
- 1.2. This document is a non-exhaustive summary based on information, guidance and data reasonably available at the time of writing. As such, some or all of it may be superseded or become obsolete at a later date.

2. Background

- 2.1. The Neighbourhood Plan Committee (NPC) has published a series of background papers to accompany the Neighbourhood Plan preparation. These cover a range of issues and provide more technical or detailed information than is contained in the Plan itself.

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3. Introduction

Local Green Spaces

3.1. The National Planning Policy Framework (NPPF) allows local communities to identify green areas of particular local significance for designation as Local Green Spaces. This designation will provide special protection and only allow new development in very special circumstances.

3.2. Local Green Space can be designated within the emerging South Oxfordshire Local Plan or within neighbourhood plans.

3.3. The Local Green Space designation will only be used where a green space is shown to be demonstrably special and of particular significance to the local community. Not all green spaces will be suitable for this type of designation. Existing green spaces which are currently protected and which are not suitable for Local Green Space designation.

This report

3.4. This report forms the evidence base to support the Local Green Space Policy and proposed designations as set out within the emerging Joint Henley and Harpsden Neighbourhood Plan.

3.5. The following information can be found within this report:

- The policy background relating to Local Green Space designations.
- An explanation of the process to identify potential Local Green Space designations.
- The criteria for designating Local Green Spaces.
- The methodology to be followed to assess sites.

4. Policy Background

4.1. The NPPF introduces a Local Green Space designation which allows local communities to identify green areas of particular local significance for designation as Local Green Spaces.

National Planning Policy Framework

4.2. Paragraph 99 of the NPPF states the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

4.3. At paragraph 100: the NPPF states that The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

4.4. Finally, at paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.

4.5. Additional guidance relating to the designation of Local Green Space is provided within the National Planning Policy Guidance (NPPG).

4.6. The following guidelines should be taken into account when designating Local Green Space: Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.

4.7. Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.

4.8. If land is already protected by Green Belt policy, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

4.9. One potential benefit in areas where protection from development is the norm (eg villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community.

- 4.10. Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.
- The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework.
 - Whether to designate land is a matter for local discretion.
 - The proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.
 - There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.
 - Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).
 - Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.
 - Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation.
 - Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.

Local Policy

- 4.11. SODC Plan contains a policy on existing Open Space, Sport and Recreation Facilities.
- 4.12. Policy CF4: Existing Open Space, Sport and Recreation Facilities
- 4.13. The Council will seek to protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields to ensure their continued contribution to the health and well-being of visitors and residents. Development proposals that result in the loss of such facilities will only be permitted where: i) it can be demonstrated that alternative facilities of equal or better quality will be provided in an equally accessible location as part of the development; ii) the development is for alternative sports and recreational

provision, the needs for which clearly outweigh the loss; or iii) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements.

4.14. This policy contributes towards achieving objectives 4, 6 & 7.

5. Criteria for Designation

5.1. As highlighted above, there are no restrictions on the type of green space which can be designated as Local Green Space. Allotments or urban spaces that provide a tranquil oasis could be designated. Land which is partly developed with structures such as sports pavilions, boating lakes or war memorials could also be appropriate. The key characteristic for the designation should be the particular importance to the local community.

5.2. The NPPG advises that land already subject to a designation could be proposed as Local Green Space, taking into consideration the benefits to be gained. Following this advice, the NPC does not envisage there would be a beneficial gain in identifying LGS within the following designations:

- Special Protection Areas: protected under the EC Birds Directive (79/409/EEC).
- Special Areas of Conservation: protected under the EC Habitats Directive (92/43/EEC), transposed into UK law by the 'Conservation of Habitats and Species Regulations 2010'.
- Sites of Special Scientific Interest: protected under Section 28 of the Wildlife and Countryside Act 1981.
- Local Nature Reserves: protected by the National Parks and Access to the Countryside Act 1949.
- Registered village greens and common land: protected by the Commons Act 2006.
- Sites within the Green Belt.

5.3. A site proposed as Local Green Space must meet the criteria set out within the NPPF. The land must meet all the following criteria:

- demonstrably special to local community;
- reasonably close proximity to the community served;
- local in character and not an extensive tract of land; and
- not an area with extant planning permission within which the Local Green Space could not be accommodated

5.4. The land must hold particular local significance for at least one of the following reasons:

- beauty
- historic significance
- recreational value
- tranquillity
- wildlife
- other reason

6. Assessment Methodology

6.1. A methodology has been developed to provide a clear framework for assessment of submitted Local Green Spaces. This is illustrated at figure 4.1.

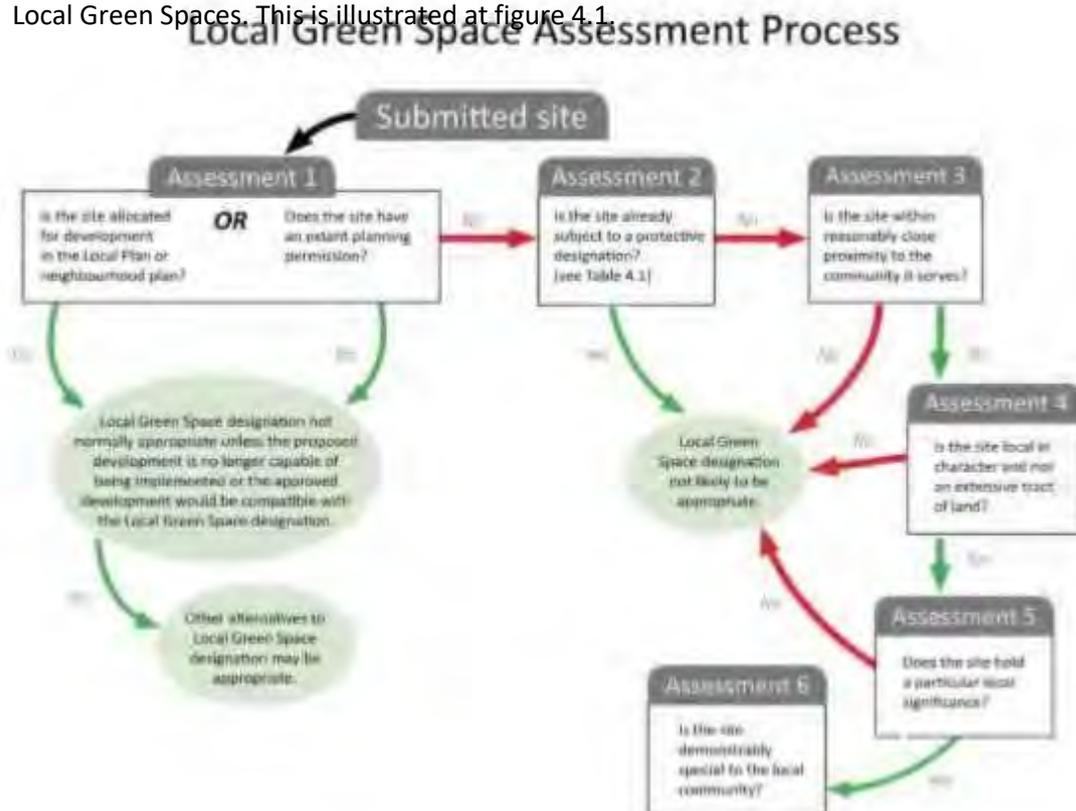


Figure 4.1 Local Green Space assessment process.

6.2. Assessments 1 – 4 determine whether submitted sites are suitable for designation based on their planning status, their proximity to the community which they serve, whether they are protected under alternative designations and whether they are considered to be an extensive tract of land.

6.3. Sites which pass Assessments 1 – 4 will progress to detailed Assessment 5 to determine whether the site has been shown to be demonstrably special to a local community.

6.4. Where one or more of the criterion within Assessment 5 are met, the site will progress to Assessment 6.

6.5. Sites passing assessments 1 – 6 will be considered for designation within the context of wider local planning objectives. The NPPF states that identifying land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. The NPPG also states that Local Green Space designations should not be used in a way that undermines the aims of plan making.

6.6. As such, the decision to allocate Local Green Space will be taken alongside decisions to allocate land for development, (e.g. for housing, employment or other commercial need), within the emerging Neighbourhood Plan. The allocation of land for development will be informed by a range of studies and assessments which will make up the evidence base for the Local Green Space Assessment. The decision to designate areas for Local Green Space requires a balanced approach, considering all relevant criteria and needs within the district. This document forms part of the evidence base for the Neighbourhood Plan.

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Assessment 1: Does the site have an extant planning permission for an alternative use that would be incompatible with a Local Green Space designation? Is the site allocated within an existing Local Plan or Neighbourhood Plan for an incompatible alternative use? Is the site likely to be allocated for an incompatible alternative use within an emerging plan?	
Method	Assessment
<ul style="list-style-type: none"> • Check site planning history • Check current Local Plan • Check SHELAA 	Scope out sites with extant planning permission/allocations/proposed allocations unless the proposed development is no longer capable of being implemented or the approved development would be compatible with the Local Green Space designation.

Assessment 2: Is the site already subject to a designation?	
Method	Assessment
<ul style="list-style-type: none"> • Check Current Local Plan • Check Magic Maps • Check with Common Land and Village Green Officer 	<p>Scope out any sites which are wholly designated as</p> <ul style="list-style-type: none"> • Special Protection Areas: protected under the EC Birds Directive (79/409/EEC) • Special Areas of Conservation: protected under the EC Habitats Directive (92/43/EEC), transposed into UK law by the 'Conservation of Habitats and Species Regulations 2010'. • Sites of Special Scientific Interest: protected under Section 28 of the Wildlife and Countryside Act 1981 • Local Nature Reserves: protected by the National Parks and Access to the Countryside Act 1949. • Registered town greens and common land: protected by the Commons Act 2006.

Assessment 3: Is the site within reasonably close proximity to the community it serves?	
Method	Assessment
<ul style="list-style-type: none"> • GIS mapping tool 	<p>Guidance in the NPPG states that the proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.</p> <p>As a guide, the officer will use Natural England's ANGSt when assessing the locality of a proposed Local Green Space site. This means that a Local Green Space less than 20ha should normally be located within 2km (1.25 miles) of the community it serves, and smaller sites of 2ha (5 acres) or less should normally be located within 300m (325 yards) of the community it serves.</p>

Assessment 4: Is the site local in character and not an extensive tract of land?	
Method	Assessment
•	The NPPF is clear that the Local Green Space designation should only be used where the site is not an extensive tract of land. Extensive tracts of land on the edge of settlements and blanket designations of open countryside will not be appropriate.

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Assessment 5: Does the site hold a particular local significance?	
Method	Assessment
Officer assessment	The proposed designation must be based on evidence to demonstrate why the green area is demonstrably special to a local community and is of particular local significance. To meet this requirement an area must fulfil one or more of the criteria below.
Officer assessment of whether the site holds particular local significance because of its historic significance	<p>In order to meet this criterion, there must be evidence to demonstrate that the site is of historic importance to the community.</p> <ul style="list-style-type: none"> • Are there any historic buildings, features or remains on the site? For example, listed buildings, scheduled ancient monuments, war memorials. • Are there any historic landscape features on the site? For example, old hedgerows, ancient trees, historic ponds, historic garden features. • Did the site play an important role in the historic development of the village or town? For example, part of the grounds for the manor house, site of an old railway station, village green. • Did any important historic events take place on the site? Is there a longstanding event which takes place on the site? For example, well-dressing, maypole dancing, pace egg, plays, market
Officer assessment whether the site holds particular local significance because of its recreational value	<p>There must be evidence to show that the space has local significance for recreation and is of value to the community. Whilst a large number of green spaces will offer some form of recreational value, it will be necessary to identify why a particular space offers something unique that could not realistically be accommodated on other spaces that would serve the same community.</p> <p>Is there evidence or is it feasible that the site is used for playing sport? Which sport? Is this sports provision free or is club membership required? Is it good quality? Are there better facilities nearby? Is there evidence or is it feasible that the site is used for informal recreation? Can the site be accessed easily?</p>
Officer assessment of whether the site holds particular local significance because of its tranquillity	<p>There must be evidence to show that the site submitted is viewed to be of importance to the local community because of the tranquillity it provides offering a place for reflection and peaceful enjoyment. This is a subjective assessment and will require clear justification as to why an area is of particular value.</p> <p>Is the site considered to be tranquil? What features make it feel tranquil? Does it enhance the feeling of tranquillity within the local area through a feeling of remoteness? Does it provide an area of tranquillity within a busy setting by hiding man-made structures such as roads, power-lines or lighting?</p>
Officer assessment of whether the site holds particular local significance because of its richness of wildlife	<p>There must be evidence to show that the site is viewed to be of local significance because of the wildlife it is home to.</p> <p>Is the site formally designated for its wildlife value? If the site is not formally designated, is there any evidence that there are important habitats or species found on the site? Have ecological surveys been undertaken on or close to the site? Could it form part of an ecological network? Is the site adjacent to a designated site? Is there any evidence, or is it likely that other wildlife of interest has been found</p>

	on the site? Are there ancient hedgerows, woodland, veteran trees on the site?
Officer assessment of whether the site holds particular local significance for any other reason	There must be evidence that the proposed site holds particular local significance for the community for reasons other than those identified above. What are the other reasons which make the site significant for the local community? Is the site a focal point or stopping place? Does it provide key views across or looking out of the local area? What features make this site important?

Assessment 5: Does the site hold a particular local significance?	
Method	Assessment
Officer assessment	Submitted evidence will be reviewed to determine How the site was identified? Was it instigated by the community or town council? Or an individual? Was it raised at a meeting or through a survey? Has the site been subject to discussion or planning processes before? Is there a petition? Are the signatures from local people? Does the petition relate to just this one site? Do the letters of support show that they clearly understand the justification for designating the site as a local green space? Was the site received favourably during the survey? Does the evidence show that a large proportion of the community use or value the site? Is there a need for Local Green Space in this location? Is there a shortage of accessible green space in the area? Is there evidence of a need for this kind of space in particular? Could the use of the green space be replicated elsewhere in the vicinity?

6.7. As highlighted within the Section 2 of this report, the NPPF states that Local Green Spaces should also only be designated where they are capable of enduring beyond the Neighbourhood Plan period. This highlights the importance of ensuring that if a site is designated as Local Green Space, the reasons for its designation, (i.e. its special features and qualities), will not be lost or degraded in the future. As such it is important to understand the land owners current and longer term plans for the site. All landowners are being notified of their sites submission for consideration as Local Green Space and are being consulted on the draft designations included within the Draft Neighbourhood Plan. The consultation undertaken on the Draft Neighbourhood Plan will help to inform the NPC's final considerations of whether a site is capable of enduring as Local Green Space in the future.

7. The following abbreviations are used throughout the summary table and assessment forms:

CA - Conservation Area

SLA - Special Landscape Area

TPO - Tree Protection Order

AONB - Area of Outstanding Natural Beauty

PROW - Public Right of Way

SINC - Site of Interest for Nature Conservation

SSSI - Site of Special Scientific Interest

GB - Green Belt

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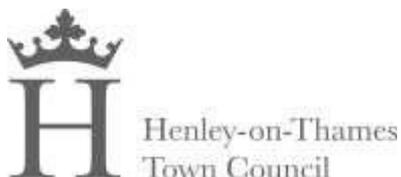
Appendix 1 – List of Sites that will be assessed for Local Green Space Designation.

1. Chiltern Dipslope and Plateau
2. Mill and Marsh Meadows
3. Makins Field
4. Freemans Meadow
5. Gillotts Field
6. Lambridge Wood
7. Temple Island Meadows
8. Highlands Farm Pit
9. Harpsden Woods
10. Pissen Wood
11. Bank by Pindars Wood
12. Hernes
13. Kents Hill
14. Crowsley Park
15. Chalk Bank
16. Gillotts Wood
17. Lucys Farm
18. Corner of Harpsden Road and Sheepcote
19. Watermans's Spinney
20. Harpsden court
21. Parkside wood
22. Henley College Wood
23. Friar Park
24. Sarah's Wood
25. Bottom of the Stony Road
26. Bottom of Little Hill
27. Harpsden bottom
28. Top of Little Hill
29. Harpsden Golf Club
30. Hunts Farm

31. Makins Bank
32. Millenium woods
33. Packham Plantation
34. Harpsden Cricket Club

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AGENDA



Report subject	Local Green Space Methodology
Committee name	Neighbourhood Plan Committee
Meeting date	01.03.2021
Report author	Jodie Rhymes / Planning Officer
Report contact details	J.Rhymes@henleytowncouncil.gov.uk

1. Executive summary

- 1.1. The National Planning Policy Framework (NPPF) introduces a Local Green Space designation which allows local communities to identify green space of particular local significance for designation as Local Green Space.
- 1.2. The purpose of this report is to explain the methodology to be used to assess sites for this designation. This evidence will form part of the background information to support the revised Neighbourhood Plan.

2. Background information

- 2.1. The National Planning Policy Framework (NPPF) was published by the government on 19 February 2019. It sets out the government's planning policies for England and how these should be applied.
- 2.2. The NPPF introduced a new optional designation of Local Green Space with paragraph 99 stating: "the designation of land as a Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them."
- 2.3. Paragraph 100 continues to consider the circumstances in which land may be allocated as Local Green Space:

"The Local Green Space designation should only be used where the green space is:

 - a) in reasonably close proximity to the community it serves;*
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance,*

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recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land.”

2.4. Paragraph 101 states that: *“policies for managing development within a Local Green Space should be consistent with those for Green Belts.”*

3. Detailed consideration

3.1. It is worth noting that Green Spaces can be described in many ways and can be referred to as public open space, open land areas, education and formal recreation areas, and Local Green Spaces. Some of these descriptions have a specific meaning in national legislation whilst others are locally used descriptions.

3.2. This report sets out the policy background and explains the process to identify Local Green Spaces. The sites will be subject to an initial sift to ensure they meet the requirements of the NPPF, those that do will be subject to a detailed assessment to determine whether the site holds a particular local significance.

3.3. The Local Green Space designation will only be used where a green space is shown to be demonstrably special and of particular significance to the local community. Not all green spaces will be suitable for this type of designation. Existing green spaces which are currently protected and which are not suitable for Local Green Space designation.

3.4. There are numerous other designations that may already be applied to green spaces. In some instances, existing designations may be adequate such as Sites of Special Scientific Interest (SSSI) or registered Town Greens. These sites will not require Local Green Space designation.

3.5. The sites to be considered have been collated from a number of sources including local knowledge of Henley and Harspden and results of the Neighbourhood Plan Survey.

3.6. A full copy of the methodology and a list of the sites to be assessed are provided in the Topic Paper.

4. Impact assessment

4.1. The Town Council has a statutory duty to consider the effects of its decisions on biodiversity, and crime and disorder in the area. As the Council has also declared a climate emergency, this should also be considered.

(a) Biodiversity

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- (b) Crime and disorder
- (c) Climate emergency

5. Recommendation

5.1 It is recommended that the Committee **RESOLVES**

The Local Green Space methodology is used to determine LGS Designations.

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Report subject	Budget Expenditure for Neighbourhood Plan Review
Committee name	Neighbourhood Plan Committee
Meeting date	1 March 2021
Report author	Cath Adams, Deputy Clerk/Planning and Project Manager
Report contact details	c.adams@henleytowncouncil.gov.uk , 07801 594121

1. Executive summary

- 1.1. This report details expenditure against the Neighbourhood Plan budget for publicity, marketing and communication.

2. Background information

- 2.1. In October 2020 Harpsden Parish Council agreed to contribute £7,500 to Henley Town Council from CIL monies received from developments in the Neighbourhood Plan. This was allocated for marketing and communication costs for the review of the Joint Henley and Harpsden Neighbourhood Plan.
- 2.2. At Finance, Strategy and Management Committee on 10 November 2020, Henley Town Council resolved to allocate £8,000 from CIL monies towards publicity costs for the review of the Joint Henley and Harpsden Neighbourhood Plan, making a total of £15,500 available for marketing and publicity.
- 2.3. This report sets out expenditure to date and draws attention to the Committee's likely expenditure over the coming months.

3. Detailed consideration

3.1. Expenditure to date and remaining combined budget:

Item	Amount	Amount remaining
Advertisement for Developer Presentations in Henley Standard	£337	£15,163
Advertisement for Neighbourhood Plan Survey in Henley Standard	£337	£14,826
Advertisement for Neighbourhood Plan Survey in Henley Herald	£50	£14,776
Print of flyers for Neighbourhood Plan Survey	£189	£14,587
Distribution of flyers advertising Neighbourhood Plan Survey	£600	£13,987

3.2. Predicted Expenditure over coming months:

4.

Item	Estimated Cost	Timescales
Adverts for Exhibition of Sites	£550	May 2021
Posters for Exhibition of Sites	£250	June 2021
Possible Marquee for Exhibition of Sites	£2,500	June 2021
External Design of documents	£5,000	September 2021
Licence for Adobe InDesign for editing documents	£260	September 2021
Printing for Pre-submission Consultation	£1,000	October 2021
Delivery of Pre-submission Consultation information	£750	October 2021

AGENDA ITEM 8

4. Impact assessment

4.1. The Town Council has a statutory duty to consider the effects of its decisions on biodiversity, and crime and disorder in the area. As the Council has also declared a climate emergency, this should also be considered.

- (a) Biodiversity – use of paper from sustainable sources will be confirmed with printers
- (b) Crime and disorder – no adverse impacts anticipated
- (c) Climate emergency – local companies will be used wherever possible to reduce transport costs

5. Recommendation

5.1 It is recommended that the Committee **RESOLVES** to note the report

**COUNCILLORS ARE HEREBY INVITED TO
ATTEND A MEETING OF THE
NEIGHBOURHOOD PLAN COMMITTEE**

to be held on

MONDAY 14 JUNE 2021 AT 3PM

online at

zoom.us (or via your device app)



Sheridan Jacklin-Edward
Town Clerk
8 June 2021

MEMBERSHIP: Chair, Councillor Ken Arlett – Henley Town Council
(HTC) Vice Chair, Councillor Laurence Plant – HTC
Councillor Ian Clark – HTC
Councillor Glen Lambert – HTC
Councillor Michelle Thomas – HTC
Councillor Kester George – Harpsden Parish Council (HPC)
Councillor Matt Leeman –HPC
Don Barraclough
Rebecca Chandler-Wilde
Joan Clark
Patrick Fleming
Geoff Lockett
Jim Munro
Jackie Walker
David Whitehead

**MEETING OF THE NEIGHBOURHOOD PLAN
COMMITTEE 14 JUNE 2021 AT 3PM
AGENDA**

- | | Pages |
|---|--------------|
| 1 APOLOGIES FOR ABSENCE
To receive and consider for acceptance apologies for absence. | |
| 2 DECLARATIONS OF INTEREST
To receive any interests relating to the business to be transacted at the meeting. | |
| 3 PUBLIC PARTICIPATION
To receive questions and comments from members of the public on any items included on the agenda. NB: attention is drawn to the Council's Public Participation Scheme attached.

To participate: email j.rhymes@henleytowncouncil.gov.uk for the meeting password

To attend but not speak: view a live stream of the meeting via the link on our homepage: www.henleytowncouncil.gov.uk . | |
| 4 TERMS OF REFERENCE
To note the Terms of Reference (attached) approved at Planning Committee. | 5 |
| 5 NOTES
To approve the Notes of the Neighbourhood Plan Committee meeting held on 20 May 2021 (attached). | 7- 11 |
| 6 UPDATE FROM PLANNING OFFICER
To receive an update on progress since the last meeting. | |
| 7 UPDATES FROM WORKING GROUPS
To receive any updates since the last Neighbourhood Plan Committee meeting: <ul style="list-style-type: none">i) Schools, Colleges, Doctors' Surgeries, Utilities etc. (<i>Rebecca Chandler-Wilde and Councillor Michelle Thomas</i>)ii) Libraries, Community Halls, Sports and Leisure Facilities (<i>Joan Clark</i>)iii) Transport (<i>Patrick Fleming, Don Barraclough, Geoff Lockett, Councillor Kester George, Jackie Walker</i>)iv) Car Parks (<i>Councillor Ken Arlett and Geoff Lockett</i>)v) New Housing, Permitted Development Rights since March 2017 (<i>David Whitehead, Rebecca Chandler Wilde, Councillor Kester George and</i> | |

Councillor Michelle Thomas)

- vi) Business and Community Engagement (*Rebecca Chandler-Wilde, Jackie Walker, Patrick Fleming and Councillor Ken Arlett*)
 - To consider the Site Assessment Feedback Form.
- vii) Review all existing sites (*Councillor Ken Arlett, Councillor Kester George, Councillor Ian Clark*)
- viii) Industrial Land (*Councillor Ken Arlett, Councillor Ian Clark, Councillor Sara Langton*)
- ix) Site Selection (*Councillor Ken Arlett, Councillor Kester George, Councillor Michelle Thomas and Joan Clark*)
- x) Conservation Area Review and Local List (Heritage Sites) (*Jodie Rhymes*)
- xi) Climate Emergency 2030 (*Councillor Ken Arlett, Rebecca Chandler-Wilde, Patrick Fleming and Jackie Walker*)

13-21

8 OXFORDSHIRE NEIGHBOURHOOD PLANS ALLIANCE (ONPA)

To receive an update from the Oxfordshire Neighbourhood Plans Alliance.

9 COMMUNITY LAND TRUST

To receive an update on a Community Land Trust for Henley.

10 LOCAL GREEN SPACE

To consider the proposed Local Green Space designations (Document attached).

23-47

11 NEW POLICIES

To consider and approve the scope of the draft housing policies to be included within the revised Neighbourhood Plan (Document attached).

49-51

12 BUDGET

To receive a verbal update on Neighbourhood Plan budgets.

13 LOGO

To consider and approve the logo for the revised Joint Henley and Harpsden Neighbourhood Plan.

53

14 NEXT STEPS

To consider next steps for taking forward the Neighbourhood Plan review.

15 NEXT MEETING

To consider a date for the next meeting of the Neighbourhood Plan Committee.

Henley-on-Thames Town Council

Public Participation Scheme

The Council will set aside a period at the commencement of each meeting when members of the public can ask questions or make statements. The following rules shall apply:

1. This scheme applies to meetings of the Council, its committees, and sub-committees.
2. There will be a Public Participation Session at the start of every meeting to which this scheme applies. At Full Council, members of the public, including Councillors who may have a personal and Pecuniary interest on any item included on the agenda, may ask questions or make a statement on any matter which affects the town. The session will last for a period of up to 20 minutes (but capable of being extended at the Chairman's discretion).
3. Members of the public may ask questions or make a statement on any item included on the agenda. The session, which is also open to Councillors who may have a personal and prejudicial interest on any item included on the agenda.
4. Questions from the town's residents will take priority, followed by property owners, businesses and then non-residents.
5. All speeches shall last for no more than 2 to 3 minutes.
6. If there are no statements or questions, or if all statements have been made or questions asked before the period of time allotted, the meeting will start to consider the remainder of its business. No further public questions or statements will be entertained at that meeting.
7. If an answer to a question cannot be given at the meeting the Chairman may, at his/her discretion, arrange for a written answer to be given.
8. The Chairman of the meeting will have complete discretion as to the order in which questions are taken and statements made. Supplementary questions may be asked at the Chairman's discretion.
9. The Chairman of the meeting may rule that any public remarks are not appropriate and will not be accepted; for example if they are defamatory, frivolous or offensive. In such an instance the Chairman may disallow a question or statement or cut short a statement or discussion, or disqualify any member of the public from continuing to speak.
10. Questions which require the disclosure of exempt or confidential information will not be answered.
11. The Chairman of the meeting's interpretation of this procedure shall not be questioned and his/her ruling on any questions relating to this procedure shall be final.

NEIGHBOURHOOD PLAN COMMITTEE

TERMS OF REFERENCE

1. Membership

- 1.1 The Committee shall consist of at least 3 Henley Town Councillors (to include the Chair of Planning Committee ex-officio), 2 Harpsden Parish Councillors and at least 6 co-opted members of the public with previous involvement in the development of the Joint Henley and Harpsden Neighbourhood Plan (JHHNP).

2. Purpose

- 2.1 The Committee's role will be:
- i) to strengthen, review and ensure governance of the delivery of the JHHNP
 - ii) to review the delivery of the JHHNP in line with the adopted South Oxfordshire Local Plan 2035
 - iii) to review the JHHNP

3. Quorum

- 3.1 Quorum shall be at least 3 Henley Town Councillors or Harpsden Parish Councillors, or any combination of councillors.

4. Election of Chair

- 4.1 A Chair (who should be a Councillor) and Vice Chair shall be elected at Planning Committee.

5. Remit

- 5.1 The Neighbourhood Plan Committee reports to Planning Committee. All recommendations will be reported to Planning Committee for consideration.
- 5.2 The Neighbourhood Plan Committee will meet as called by the Chair.
- 5.3 The Neighbourhood Plan Committee has budget responsibility for up to £5000 for planning consultancy advice and delegated powers only as set out in Paragraph 5.4 below.
- 5.4 On matters that require further research, for example requesting a more detailed report or seeking clarification from third parties on a specific item, then the Neighbourhood Plan Committee shall have a delegated power to act.
- 5.5 The Neighbourhood Plan Committee may co-opt members and liaise with a community panel as they so wish.

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**NOTES FROM A MEETING OF THE
NEIGHBOURHOOD PLAN
COMMITTEE HELD AT 3:00PM ON
THURSDAY 20 MAY 2021
ONLINE VIA ZOOM.US**

Present: Chair, Councillor Ken Arlett – Henley Town Council
Vice Chair, Councillor Laurence Plant – Henley Town Council
Councillor Ian Clark – Henley Town Council
Councillor Michelle Thomas – Henley Town Council
Councillor Kester George – Harpsden Parish Council
Councillor Matthew Leeman – Harpsden Parish Council
Joan Clark
Patrick Fleming
Geoff Lockett
Jackie Walker
David Whitehead

In attendance: Cath Adams – Deputy Clerk/Planning and Project Manager
Jodie Rhymes – Planning Officer

89. APOLOGIES FOR ABSENCE

Apologies for absence were accepted from Councillor Glen Lambert, Don Barraclough, Rebecca Chandler-Wilde and Jim Munro.

90. DECLARATIONS OF INTEREST

There were no declarations of interest.

91. PUBLIC PARTICIPATION

There were no members of the public present.

92. NOTES

RESOLVED: to approve the Notes from the meeting held on 19 April 2021.

93. UPDATE FROM PLANNING OFFICER

The Planning Officer delivered a verbal update on progress:

- Preparations are underway for the exhibition on the 2 and 3 July.
- Since the last committee, members of this, and other working groups, have been working on the draft policies and bringing together the supporting evidence.

Thanks were expressed to the people who had helped to bring the policies together following the advice from AECOM.

Signature: _____ Date: _____

- A meeting was held with SODC to discuss progress to date and to get support on certain policies. A meeting is awaited with OCC to talk about the transport policies and evidence.
- A group met a fortnight ago to discuss the vision and objectives for consideration under agenda item 8.

The Chair thanked the Planning Officer and all those who had assisted in the work on the draft policies.

94. UPDATES FROM WORKING GROUPS

- i) **Schools, Colleges, Doctors' Surgeries, Utilities etc.** - *Rebecca Chandler-Wilde and Councillor Michelle Thomas*
Further to the information provided at the last meeting, Councillor Michelle Thomas advised that the ONS birth rate figure in 2019 for SODC was 1.87; and the national average is 1.65. The pupil census continues to be monitored annually and there remains good capacity across Henley's primary schools. At secondary level Oxfordshire is a 'net importer' of cross boundary pupils especially due to being on the boundary of local authorities with selective education systems. Primary School capacity was queried following anecdotal evidence about insufficient places in the town. Up to date figures will be obtained in due course.
- ii) **Libraries, Community Halls, Sports and Leisure Facilities** – *Joan Clark*
No further update. The Planning Officer will review recommendations from the topic paper.
- iii) **Transport** - *Patrick Fleming, Don Barraclough, Geoff Lockett, Councillor Kester George, Jackie Walker*
The evidence needed to support the transport policies for the revised Plan is being considered. AECOM have suggested that the Transport Study produced by Peter Brett Associates in 2015 may need to be updated. A meeting with OCC is awaited to discuss whether a full review of the study is required, or whether the Committee could review sections itself. Recommendations will come back to the next Committee meeting. Community First Oxfordshire are switching from a focus group to surveys in order to carry out the stakeholder engagement required.
- iv) **Car Parks** - *Councillor Ken Arlett and Geoff Lockett*
No further update. Councillor Arlett advised the meeting that charging would change in SODC car parks from 1 June and there would be an hour's free parking throughout the day, plus charging on a Sunday.

Signature: _____ Date: _____

- v) **New Housing, Permitted Development Rights since March 2017** – *David Whitehead, Rebecca Chandler Wilde, Councillor Kester George and Councillor Michelle Thomas*
No update.
- vi) **Business and Community Engagement** – *Rebecca Chandler-Wilde, Jackie Walker, Patrick Fleming and Councillor Ken Arlett*
Preparations for the exhibition in July are underway and Community First Oxfordshire are preparing a form to be filled out by attendees at the exhibition. This form will ask for people’s feedback on the site options when considering the AECOM site assessment. There will also be an online survey so that people can get involved without having to attend in person. A video to highlight the key themes of the review is planned and members will be contacted to set this in motion.
- vii) **Liaison with other Parishes carrying out NP Reviews** – *Patrick Fleming, Councillor Ken Arlett, Cath Adams*
It was agreed that this item be removed from the agenda.
- viii) **Review all existing sites** - *Councillor Ken Arlett, Councillor Kester George, Councillor Ian Clark*
An amended application has been submitted for the Fairmile site.
- ix) **Industrial Land** – *Councillor Ken Arlett, Councillor Ian Clark, Councillor Matthew Leeman*
No update.
- x) **Site Selection** – *Councillor Ken Arlett, Councillor Kester George, Councillor Michelle Thomas and Joan Clark*
Awaiting site exhibition.
- xi) **Conservation Area Review and Local List (Heritage Sites)** – *Jodie Rhymes*
SODC are still reviewing the Harpsden and Henley draft Conservation Area Appraisals and Purcell will update the documents following their comments. The Planning Officer will arrange a meeting to discuss the report.
- xii) **Climate Emergency 2030 Working Group** – *Councillor Ken Arlett, Patrick Fleming, Rebecca Chandler-Wilde and Jackie Walker*
The draft policies are waiting on feedback from SODC on trees and further evidence is being gathered from both SODC and OCC.

Signature: _____ Date: _____

95. OXFORDSHIRE NEIGHBOURHOOD PLANS ALLIANCE (ONPA)

Patrick Fleming advised the meeting that an event remained to be scheduled on affordable housing and that more than 12 neighbourhood plans had recently gone through referendum in Oxfordshire.

96. VISION AND OBJECTIVES

The Committee considered the revised Vision and Objectives for the new JHHNP. It was

RESOLVED TO RECOMMEND TO PLANNING COMMITTEE to approve the Draft Vision and Objectives for the revised Joint Henley and Harpsden Neighbourhood Plan.

Councillor Kester George agreed to take the Vision and Objectives to Harpsden Parish Council for consideration.

97. EXISTING POLICIES

The Committee considered a report on the inclusion of existing policies in the revised JHHNP. It was

RESOLVED TO RECOMMEND TO PLANNING COMMITTEE:

- i) to confirm the inclusion of the existing policies on the themes of Social and Community Infrastructure, Retail and Town Centre, Employment and Design Quality, to be included within the revised Joint Henley and Harpsden Neighbourhood Plan**
- ii) that the final wording and content of the policies and supporting text is delegated to the Planning Officer**

Councillor Kester George agreed to take the existing policies to Harpsden Parish Council for consideration.

98. NEW POLICIES

The Committee considered a report on the scope of new draft environmental, climate change and transport policies for the revised JHHNP. It was

RESOLVED TO RECOMMEND TO PLANNING COMMITTEE:

- iii) to confirm the provisional preferred policy approaches to be included within the revised Joint Henley and Harpsden Neighbourhood Plan**
- iv) that the final wording and content of the policies and supporting text is delegated to the Planning Officer**

Councillor Kester George agreed to take the new policies to Harpsden Parish Council for consideration.

Signature: _____ Date: _____

99. COMMUNITY LAND TRUST

The Committee received a verbal update on progress on a Community Land Trust. A workshop will be facilitated by the Collaborative Housing Hub for Oxfordshire. This will bring together the current group with the respondents to the Neighbourhood Plan survey who were interested in joining the steering group. The workshop is due to take place in June.

100. NEXT STEPS

The housing policies and assessment of local green spaces will be brought back to the next meeting, together with the feedback form to be given out at the exhibition in July.

Volunteers are sought to attend the site exhibition and a poll to check availability will be circulated. A brief will be prepared for volunteers.

101. NEXT MEETING

The next meeting of the Neighbourhood Plan Committee will be held on **Monday 14th June 2021 at 3pm.**

The meeting closed at 3.50pm

JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

Joint Henley and Harpsden Neighbourhood Plan Examination,
A Report to South Oxfordshire District Council

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

Nigel McGurk
Erimax Land, Planning and
Communities
erimaxltd.com
November 2015



Contents:

1. Introduction

2. Basic Conditions and Development Plan Status

3. Background Documents and the Joint Henley and Harpsden Neighbourhood Area

4. Public Consultation

5. The Neighbourhood Plan: Introductory Section

6. The Neighbourhood Plan: Policies

- **Housing**
- **Transport and movement**
- **Social and community infrastructure**
- **Retail and town centre**
- **Employment**
- **Environment**
- **Design Quality and Sustainability**
- **Site Policies**

7. The Neighbourhood Plan – Other Matters

8. Summary

9. Referendum



1. Introduction

The Neighbourhood Plan

This Report provides the findings of the examination into the Joint Henley and Harpsden Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”

(Paragraph 183, National Planning Policy Framework)

Henley Town council is the *qualifying body* responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014). However, the Neighbourhood Area includes land within the adjoining Parish of Harpsden and I note, to produce the Neighbourhood Plan, resident-based working groups reported to a Neighbourhood Plan Governance Committee, which comprised Henley and Harpsden town and parish councillors.

This Examiner's Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by South Oxfordshire District Council. The Neighbourhood Plan would then be used to determine planning applications and guide planning decisions in the Joint Henley and Harpsden Neighbourhood Area.

Role of the Independent Examiner

I was appointed by South Oxfordshire District Council, with the consent of the qualifying body, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience.

I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;
- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Joint Henley and Harpsden Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The Neighbourhood Plan is unclear in this regard. The title page of the Neighbourhood Plan simply refers to the date of its publication (June 2015) and there is no reference to the plan period.

Rather than set out the full plan period with clarity, Paragraph 2.1 on page 6 refers to the Neighbourhood Plan providing a vision for the area “...*up to 2027*.” There is no reference to a start date.

Unfortunately, the confusion is compounded later in the Neighbourhood Plan. Paragraph 7.4 on page 33 states that the South Oxfordshire Core Strategy 2012 (Core Strategy) identifies a housing land requirement for the period “...*between 2011 and 2026*.” However, the Core Strategy covers the period 2006 to 2027 and takes into account housing completions between 2006–2012.

Taking the above into account and to provide clarity/avoid confusion, I recommend:

- **Title page, replace “June 2015” with “2012--2027”**
- **Page 6 Paragraph 2.1 line 7, change to “*The JHHNP sets out the community vision for the future of the area during the plan period 2012--2027.*”**
- **Page 33 Paragraph 7.4 line 3, change to “*...new homes during the period up to 2027 at Henley, being...*”**
- **Page 33 Paragraph 7.5 line 7, change to “*...within the period up to 2027.*”**

Taking the above into account, I confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to South Oxfordshire District Council that I was satisfied that the Joint Henley and Harpsden Neighbourhood Plan could be examined without the need for a Public Hearing.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*¹ following the Localism Act 2011. In order to meet the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the basic conditions above.

On Page 6, the Neighbourhood Plan states that there is a “*need for Neighbourhood Plans to be consistent with both the National Planning Policy Framework and any relevant Development Plan policies.*” This is not the case. The basic conditions are referred to above.

Also on Page 6, the Neighbourhood Plan states that it is a requirement of the Localism Act for neighbourhood planning policies to “*accord with higher level planning policy.*” Again, this is not the case.

Whilst it is not uncommon for neighbourhood plans to seek to paraphrase the basic conditions, the wording of these basic conditions is the result of careful consideration. Paraphrasing them almost inevitably, as in this case, results in their misapplication. I recommend:

- Page 6 Paragraph 2.1, delete last sentence
- **Page 6 Paragraph 2.5, replace the second sentence with “*As well as have regard to national policies and advice, there is a need for the Neighbourhood Plan to be in general conformity with the strategic policies of the development plan for the area. For this reason...*”**

The relevant development plan for the area is the South Oxfordshire Core Strategy, which was adopted in 2012.

European Convention on Human Rights (ECHR) Obligations

¹ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

An objection to the Neighbourhood Plan states that “*under European legislation we in Henley have the Human Right to breathe clean air.*” However, there is no substantive evidence to lead me to the conclusion that the Neighbourhood Plan is in conflict with the ECHR in this regard.

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

European Union (EU) Obligations

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal². However, in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment.

The Basic Conditions Statement confirms that South Oxfordshire District Council determined that a Strategic Environmental Assessment was required due to the Neighbourhood Plan including housing allocations within the Chilterns Area of Outstanding Natural Beauty (AONB).

Subsequently, a Sustainability Appraisal was produced. The Sustainability Appraisal fully incorporated the requirements of the European Strategic Environmental Assessment Directive. Furthermore, it is clear from consideration of the evidence submitted that Sustainability Appraisal was integral to the plan-making process and was consulted upon in an appropriate manner.

The Environment Agency, English Heritage (now, with regards to planning matters, Historic England) and Natural England were consulted and their comments taken into account. None of the statutory consultees have raised any concerns with the Sustainability Appraisal or its conclusions.

A Habitats Regulations Assessment (HRA) is required if the implementation of the Neighbourhood Plan may lead to likely negative significant effects on protected European sites. The Basic Conditions Statement confirms that, as there are no European sites that would be affected, a HRA was not required.

With regards European obligations, I am mindful that national guidance establishes that the ultimate responsibility of determining whether or not a draft neighbourhood plan meets EU obligations lies with the local authority,

“the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.” (Planning Practice Guidance 11--031)

² Paragraph 026, Planning Practice Guidance 2014.

South Oxfordshire District Council has confirmed that it has “*worked closely*” with the Neighbourhood Plan group and that most issues have been resolved “*in an appropriate and satisfactory way.*” South Oxfordshire District Council has not raised any concerns regarding the Neighbourhood Plan’s compatibility with EU obligations.

Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations.

I note that an objector to the Neighbourhood Plan considers that “*the SEA/SA is fundamentally flawed.*” It is the objector’s contention that the Sustainability Appraisal “*overlooks any benefits in relation to meeting housing needs as identified by the Oxfordshire SHMA.*” However, there is no specific legislative requirement for this. Notwithstanding this, I note that it is neither possible, nor relevant, for a Sustainability Appraisal to consider every possible future scenario.

In the above regard, I am also mindful that the Sustainability Appraisal considers scenarios that relate directly to the housing requirement for Henley, as set out in the Core Strategy. I also note that, whilst comments have been received which suggest that “*Henley is in breach of*” EU Air Quality Directives, no substantive evidence has been provided to demonstrate that the Neighbourhood Plan is not compatible with EU obligations.



3. Background Documents and Joint Henley and Harpsden Neighbourhood Area

Background Documents

In undertaking this examination, I have considered various information in addition to the Joint Henley and Harpsden Neighbourhood Plan. This has included:

- National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- South Oxfordshire Core Strategy (2012) (Core Strategy)
- Basic Conditions Statement
- Consultation Statement
- Sustainability Appraisal
- Henley Transport Study
- Viewing Corridors

Also:

- Representations received during the publicity period

In addition, I spent an unaccompanied day visiting the Joint Henley and Harpsden Neighbourhood Area.

Joint Henley and Harpsden Neighbourhood Area

A plan showing the boundary of the Joint Henley and Harpsden Neighbourhood Area is provided on page 7 of the Neighbourhood Plan.

I note that one of the reasons for the inclusion of both Henley and Harpsden Parishes in a single Neighbourhood Area was the location of potential housing sites, identified by South Oxfordshire District Council, on the edge of Henley, but within Harpsden Parish. This appears to me to be a logical and appropriate reason for the establishment of an extended Neighbourhood Area, encompassing both Parishes.

Further to an application made by Henley Town Council, South Oxfordshire District Council approved the designation of Henley and Harpsden as a Neighbourhood Area on 10 June 2013.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

Joint Henley and Harpsden Neighbourhood Plan Consultation

In line with legislative requirements, a Consultation Statement was submitted to South Oxfordshire District Council. Further to consideration, I can confirm that this sets out who was consulted and how, together with the outcome of the consultation. In this regard, the Consultation Statement meets the requirements of the neighbourhood planning *regulations*³.

There is evidence to demonstrate that the views of the wider community were actively sought and taken into account. It is also clear that the plan-makers undertook significant and comprehensive public consultation, beyond that required by legislation.

At the start of the process, a Baseline Report was produced, to establish the social, environmental and economic characteristics of the area. Initial public consultation followed the delivery of a leaflet to every household in September 2013 and at the same time, residents were asked to volunteer to join working groups. Further consultation on initial options was carried out over the Christmas period in 2013 and further to a series of working group sessions during the first part of 2014, a draft plan was consulted on between May and July that year.

Once comments on the first draft had been taken into account, further working group sessions, along with a public focus group, modified the initial document and produced a second draft plan, which was consulted upon during February and March 2015.

The whole of the above was supported by a significant series of well-advertised events. For example, the initial public consultation was supported by five days of exhibitions and open days in three separate venues; and around 450 people

³Neighbourhood Planning (General) Regulations 2012.

attended events during the Christmas 2013 consultation, with nearly 500 completed questionnaires received.

Separate events were held with pupils at Gillots School and Henley College. Over 500 Henley College students completed a questionnaire. A business breakfast workshop was held and reported, with assistance from South Oxfordshire's economic development team. Also, site promoters and landowners were invited to present to working groups and participate in Q and A sessions, with nine promoters taking part over two days in November 2013.

Notably, more than 60 local residents volunteered to join the working groups, which considered and reported the full range of issues covered by the Neighbourhood Plan; and which ultimately determined the Neighbourhood Plan's content. Whilst an objection has criticised the working groups as holding meetings in "*closed session*" and keeping the identity of individuals "*secret*," there is no substantive evidence before me to demonstrate that the working groups carried out their roles inappropriately. On the contrary, I consider it a tribute to the local community that as many as 60 local residents were prepared to dedicate their time and effort to the purpose of producing the Neighbourhood Plan.

The two draft plan consultations were supported by significant activities, including exhibitions, events, drop-in sessions and the distribution of leaflets and questionnaires.

It is clear, from consideration of the Consultation Statement, that plan-makers went well beyond legislative requirements, to actively seek comments on, and involvement in, the neighbourhood planning process.

Consultation was widely communicated and well-publicised in a variety of ways, including via a comprehensive Neighbourhood Plan website, from which relevant documents and information could be accessed; through the extensive use of questionnaires, including Survey Monkey; via email and social media; through the publication of minutes; via the delivery of leaflets; through notices and posters; and through coverage in the Henley Herald and Henley Standard.

Taking all of the above into account, the Consultation Statement presents an audit trail to demonstrate that consultation was wide-ranging, comprehensive and transparent. Comments were pro-actively sought and comments received were duly considered. There is plentiful evidence to demonstrate that the Neighbourhood Plan reflects the views of local people.

Consultation was carried out in an open manner, and people and organisations were not just provided with a fair chance to have their say, but were actively encouraged to engage in shaping the Neighbourhood Plan.

I am satisfied that the consultation process was comprehensive and robust.



5. The Neighbourhood Plan – Introductory Section

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

The policies of the Neighbourhood Plan are considered against the basic conditions in Chapter 6 of this Examiner's Report. I have also considered the Introductory Section of the Neighbourhood Plan and make recommendations below which are aimed at making it a clear and user-friendly document.

The Neighbourhood Plan is well presented. The use of plans and diagrams is supplemented with many interesting and informative photographs throughout the document. Text is clearly set out and Policies are distinctive from supporting information. All of this combines to result in an attractive and easy-to-read Neighbourhood Plan.

The Glossary and Contents are concise. However, the summary on Pages 4 and 5 is unusual, in that it appears to attempt to "squeeze" the whole of the Neighbourhood Plan into a couple of pages. This is unnecessary – all of the information summarised on Pages 4 and 5 is repeated, with more clarity, elsewhere in the document. By leaping straight into the content of the Policies, I find that Pages 4 and 5 present an unnecessarily confusing introduction to the Neighbourhood Plan.

I recommend:

- Delete Pages 4 and 5

Pages 6 and 7 can then more appropriately introduce the Neighbourhood Plan, its background and its intentions. I have recommended changes to Page 6 earlier in this Report.

Section 3 of the Neighbourhood Plan takes four pages to explain the consultation process. This is excessive, not least as a separate Consultation Statement, setting out the process in detail, was submitted alongside the Neighbourhood Plan, in line with legislative requirements. Essentially, the information provided on Pages 8 and 9 provides a comprehensive enough summary of the process. The further detail provided on Pages 10 and 11 is unnecessary and takes emphasis away from the most important part of the Neighbourhood Plan – its Policies. I recommend:

- Delete Pages 10 and 11

Section 4 provides interesting and helpful background information. The Vision and Objectives Section, together with the Strategy Section, provides an excellent introduction to the Policies that follow. It draws a firm link between the aims of the community and the Neighbourhood Plan's Policies.

I note that Paragraph 4.4 includes an unusual reference suggesting that the County Council predicts that the population of the area will increase by just 1% by 2026. This appears as a somewhat awkward and given the content of the Neighbourhood Plan, including its housing allocations, irrelevant comment. I recommend:

- Delete the second half of Paragraph 4.4 from “The County Council...” to the end of the Paragraph.

6. The Neighbourhood Plan – Neighbourhood Plan Policies

The introduction to the Policy Section is a little confusing. For example, the National Planning Policy Framework will not deliver the Neighbourhood Plan's vision. I recommend:

- Delete Paragraph 7.1

The Table on Page 32 sets out a link between the Policies of the Neighbourhood Plan and the Objectives set out earlier. Whilst the Table adds little to the content of the Neighbourhood Plan, there is no harm in it being retained, subject to ensuring that it does not lead readers to think that the Neighbourhood Plan's Objectives carry similar weight to its Policies. I recommend:

- **Add new sentence at the end of Paragraph 7.2, “For clarity, the Neighbourhood Plan Objectives should not be confused with the Neighbourhood Plan Policies. This Table is simply provided for information purposes --- to demonstrate how the Policies of the Neighbourhood will meet the Objectives set out in the preceding pages.”**

Paragraph 7.3 introduces confusion rather than clarity. It is not a requirement for Neighbourhood Plan Policies to “conform” to Objectives. I recommend:

- Delete Paragraph 7.3



Housing

Policy H1: Allocate land for 450 new homes

I have made recommendations above with regards Paragraphs 7.4 and 7.5 of the Neighbourhood Plan.

Paragraph 7.7 provides a helpful summary of how the Neighbourhood Plan is in general conformity with the Core Strategy and how plan-makers have taken into account other relevant information, particularly that arising through the plan-making and consultation processes, to inform the Neighbourhood Plan's approach to housing allocation.

Policy H1 allocates land for 450 homes. Whilst this quantum of housing is in general conformity with Core Strategy Policies CSH1 and CSHEN1 (and reflects para 10.9 of that document, where the Inspector recommends the delivery of 450 homes in Henley, if possible), the wording of the Policy is inappropriate as it relies upon the content of other documents. I comment below with regards the deliverability of the housing allocations.

I also note that the Policy refers to the "Key Diagram." There is no Key Diagram in the Neighbourhood Plan, just an untitled plan on Pages 30 and 31. This plan is extremely "busy" and its key does not fully correspond to the content of the plan itself (for example, the AONB is not shown on the plan). In addition, whilst it is a useful reference document, it is of such a scale that it cannot appropriately define land allocations.

Taking the above into account, and subject to my further comments below, I recommend:

- **Change wording of Policy H1 to: "*Land for new housing is allocated at the sites listed below. Development within each of the sites is subject to the Site Allocation Policies set out in this Plan.*" (and retain the Table showing the sites, allocation and gross site areas)**

In the above way, Policy H1 is in general conformity with the Core Strategy. It supports sustainable growth and in this way, has regard to national policy; and contributes to the achievement of sustainable development. In addition to this, it does not set out a maximum housing number, or cap, and so does not necessarily prevent or preclude sustainable development from coming forward.

Further to the above, whilst the individual Site Allocation Policies are provided later in the Neighbourhood Plan, I find it appropriate to consider them within the Housing section of this Report as any significant changes to these Policies may impact on my recommendations in relation to Policy H1.

Policy SP1 relates to Site M, Highlands Farm, which is allocated for up to 140 new homes amongst other uses. In addition, **Policy SP12** is concerned with Site M1, a site adjacent to Site M and one that the Neighbourhood Plan seeks to reserve for development, to be released if Site C, the subject of **Policy SP11**, does not come forward by 2020.

I consider it helpful to consider **Policy SP11** first. Policy H1 allocates land at Site C (Gillotts School) for “*up to 50 dwellings.*”

The supporting text to Policy H1 refers to the delivery issues associated with Site C, largely relating to the replacement of playing fields. Whilst this is not a factor that will necessarily prevent development from coming forward – and I am mindful in this regard that the Headteacher and Chair of Governors of Gillotts School have provided evidence of how it is proposed to enhance the School’s playing facilities – it presents a risk to delivery.

From consideration of all of the evidence, I am aware that the allocation of land at Gillotts School is a matter of local contention and that ultimately, the plan-makers determined that the potential benefits of development – including enhanced alternative sports provision – would outweigh the possible harm arising.

In the above regard, I note that plan-making is rarely a straightforward process and that there are times when difficult and even contentious decisions need to be made. In this case, there is evidence to demonstrate that the decision to allocate land at Gillotts School has emerged through a process that included a balanced assessment and robust consultation. The allocation of Site C has regard to Paragraphs 72 and 73 of the Framework, which afford “*great weight to the need to...alter schools*” and recognise the “*important contribution to the health and well-being of communities*” that opportunities for sport and recreation present.

In seeking to take account of the delivery risks associated with Gillotts School, the Neighbourhood Plan seeks to allocate two reserve sites, Site M1 and Site A1 (the subject of Policy SP13), which together provide for a total of 50 dwellings.

However, whilst Policies SP12 and SP13 state that Policy H1 reserves Sites M1 and A1, this simply isn’t the case. Policy H1 does not mention Sites M1 and A1. It is the supporting text to Policy H1 that establishes that if Site C “*has not been brought forward by 1st January 2020*” then the two reserve sites will be released.

Notwithstanding the absence of any reference in Policy H1, this seems to me to be a very odd approach.

Essentially, in seeking to allocate Sites M1 and A1 as reserve sites, the Neighbourhood Plan recognises that they provide the potential for sustainable development. Having considered the information before me, it is apparent that both

reserve sites have merits whereby their residential allocation meets the basic conditions.

For example, part of Site M1 comprises previously developed land, the re-use of which is supported by national policy. The allocation of Site A1 would provide for a wide choice of high quality homes, in line with Paragraph 50 of the Neighbourhood Plan, in a location within reasonable proximity of services and facilities, and with the potential for the delivery of new and improved cycling and walking links, having regard to Chapter 4 of the Framework, which promotes sustainable transport.

The intention of the Neighbourhood Plan appears to be to prevent these sites from being released if Site C comes forward before 2020. However, what makes the approach particularly strange, is that, if Site C were to come forward for development on January 2nd 2020, then the two reserve sites would be released for development. Consequently, all three sites would be developed anyway and the Neighbourhood Plan would provide for the delivery of 500 homes during the plan period. Whilst I acknowledge that there is some evidence around which site is “better from a traffic and air quality management perspective” this becomes somewhat irrelevant, as, subject to the above, all three sites can come forward anyway.

The Ministerial Foreword to the Framework is entirely clear in stating that “*Development that is sustainable should go ahead, without delay.*” No substantive reason is provided to justify holding back the release of Sites A1 and M1, then releasing them for development if Site C has not come forward by January 1st 2020.

Further to the above, I am also mindful that both sites are adjacent to other allocations in the Neighbourhood Plan. It is a core planning principle to “*always seek to secure high quality design and a good standard of amenity*” (Para 17, Framework). Good design is indivisible from good planning and national policy requires development proposals to “*optimise the potential*” of sites (Para 58, Framework).

As set out, Policy H1 would prevent two of the most significant allocations in the Neighbourhood Plan (Sites M and A) from being planned and delivered alongside Sites M1 and A1, as it introduces uncertainty over the release of the latter two sites. This has major implications for the effective masterplanning of sustainable development.

In the case of Site A (the subject of **Policy SP8**), as noted later in this Report, the ability to plan it together with Site A1 would provide a greater opportunity to optimise its potential whilst meeting the requirement to preserve the Conservation Area and its setting. Unfortunately, the requirements of Policy H1 effectively require Site A to be planned as an entirely separate entity from Site A1. As a consequence of this, the Neighbourhood Plan fails to have regard to Paragraph 58 of the Framework.

To a large degree, Sites M and M1 form part of the same wider site. They are immediately adjacent to one another and both contain large areas of previously

developed land. Importantly, Site M1 is entirely reliant upon Site M for access. Both sites need to deal with similar archaeological and heritage constraints. The Neighbourhood Plan even states that “*The same issues relevant to Site M are applicable to Site M1.*” Planning the two sites together would clearly optimise their potential and thus have regard to national policy.

By way of contrast, as set out, the Neighbourhood Plan would actively prevent a developer’s ability to optimise the potential of both sites. It would potentially prevent the effective and sustainable re-use of previously developed land, contrary to national policy.

With regards to Site M, the Chilterns Conservation Board has expressed concern regarding potential impact on the AONB. The Framework affords great weight to conserving landscape and scenic beauty in AONBs. In this respect, I agree that it would be clearer for Policy SP1 to separate out matters relating to impact on the AONB to those relating to green infrastructure and biodiversity. However, having regard to Paragraph 59 of the Framework, which states that “*design policies should avoid unnecessary prescription or detail,*” I consider that the Policy would not meet the basic conditions if it was overly prescriptive. I take these factors into account in making the recommendations below.

I note that indicative land use plans are provided in Appendices. The Appendices do not form part of the Neighbourhood Plan. Consequently, these plans have little status. Furthermore, as indicative plans, they are subject to significant changes. Consequently, I find that the plans do not provide any degree of certainty for decision makers or prospective applicants and as such, add nothing to the content of the Neighbourhood Plan.

Taking all of the above into account, I recommend:

- **Delete Paragraph 7.8**
- **Delete Policy SP12 and associated text/plan**
- **Delete the land use plans in the Appendices (pages 80--82 inclusive) and Paragraphs 8.6, 8.17 and 8.22**
- **Policy SP1, extend Site M to include M1. Increase approximate size to 8.2ha; change a) to “around 170 homes”; and delete bullet point m) (which is incomplete anyway)**
- **Policy SP1, add bullet point b) from the deleted Policy SP12**
- **Policy SP1, delete reference to Core Strategy Policy CSQ4, it is unnecessary and confusing to reference this in a Neighbourhood Plan Policy**

- Policy SP1, end f) at “...boundary edges.” Introduce a new bullet point, below, stating “Ensures that the development has no greater impact on the AONB than the existing development on the site; and that development conserves and where possible, enhances the landscape and scenic beauty of the AONB.” Remove apostrophe in 8.2 (and 7.54) and refer to “AONB” in 8.23 (and 4.31).
- Delete Policy SP13 and associated text/plan
- Policy SP8, extend Site A to include Site A1. Change third line to “...for around 60 dwellings.”
- Policy SP8, delete bullet point e)
- Policy SP8, change 8.14, line 5, to “...of 60 dwellings across around 3.8ha, the density is around 16 dwellings per ha.”
- Policy SP8, change 8.15, line 1 to “The total of 60 dwellings is identified...”
- Policy SP8, change 8.16, line 2, to “...(around 60)...”
- Policy SP11, remove the reference to, and extract from, the Framework from the Policy, as well as the unnecessary reference to another Policy in the Neighbourhood Plan, from “The present...community as a whole.” It is not the role of Neighbourhood Plan Policies to repeat the content of other Policies from other documents and the Neighbourhood Plan should be read as a whole.
- Policy H1, Table, change Site A to “Around 60 dwellings...3.8ha”
- Policy H1, change Site M to “Around 170 dwellings as part...site...8.2ha”
- Policy H1, change Table Total to “Around 500 dwellings”

An objection to the Neighbourhood Plan contends that it does not provide for any contingency or flexibility. This is not the case. The Neighbourhood Plan does not promote less development than set out in the Core Strategy and consequently, it has regard to Paragraph 184 of the Framework. Furthermore, the Neighbourhood Plan provides for development over and above the requirements of Core Strategy Policy CSHEN1, which requires the allocation of land for 400 dwellings in Henley⁴.

⁴ I note that Policy CSHEN1’s supporting text also refers to the provision of land for an additional 50 dwellings. This takes into account the Core Strategy Inspector’s comment that a future plan should look to provide 450 dwellings if possible. The supporting text conditions this with “if it proves to be possible to identify suitable land free of constraints in the circumstances then pertaining.” Whilst I note that, in general, most development sites tend to be constrained to some degree or other, the reference provides some degree of balance to the suggestion that development in Henley is subject to a “cap.” Notwithstanding this, the neighbourhood planning

Consequently, it provides for sustainable growth, helps to boost the supply of housing and provides for the delivery of a wide choice of high quality homes. In this regard, the Neighbourhood Plan contributes to the achievement of sustainable development, has regard to the Framework and meets the basic conditions. I also note that there is no substantive evidence to demonstrate that the allocated sites are not capable of being delivered during the plan period.

A number of objections to the Neighbourhood Plan refer to alternative sites for residential allocations. However, the Neighbourhood Plan provides for sustainable development on sites that meet the basic conditions and which, together, provide for development over and above that set out in the Core Strategy. It provides for sustainable growth and there is no need for it to allocate further sites.

In acknowledging that the Neighbourhood Plan provides for development in excess of that set out in the Core Strategy, I note that Paragraph 183 of the Framework is explicit in recognising the “*direct power*” afforded to communities to “*develop a shared vision for their neighbourhood and to deliver the sustainable development they need.*” I also note that there is no substantive evidence before me to demonstrate that, either individually or together, the housing allocations would undermine the strategic policies of the Core Strategy.

In addition to the above, I am mindful that South Oxfordshire District Council has expressed some concerns “*about the capacity of the allocated sites to deliver the expected number of new homes proposed*” and that, to some degree, the recommendation above helps to address this. I also note that South Oxfordshire District Council suggests including a reference in Policy H1 to the Henley Transport Study. However, whilst informative, I note that this Study simply provides guidance.

The Table in Policy H1 uses the term “*up to*” ahead of each number of dwellings. I note above that South Oxfordshire District Council have some concerns about the number of dwellings assigned to each site. In addition, I find that the phrase “*up to*” limits the ability of each site to provide for flexibility, for example, to take account of changing market conditions over time, having regard to national policy.

Furthermore, evidence has been submitted to demonstrate that the limits imposed by the use of the phrase “*up to*” may prevent sustainable development from coming forward. For example, it is suggested that Site Z, considered later in this Report, could be capable of providing more than 13 dwellings within a sustainable development and there is no substantive evidence before me to the contrary.

Taking the above into account, I recommend:

- Policy H1, Table, change “*up to*” to “*around*”
- **Site allocation Policies, change all references to “*up to*” to “*around*”**

process in Henley has clearly identified sites in Henley with residential potential and has undergone robust consultation.

Subject to the above, Policy H1 and the subsequent site Policies contribute to the achievement of sustainable development.

The Foreword of the Framework recognises that sustainable development is about positive growth. Taking the above into account, Policy H1 has regard to national policy and contributes to the achievement of sustainable development. It meets the basic conditions.

I recommend changes to **Policy SP8** above. As a result of the recommendation, Site A will comprise around 3.8 ha and provide for around 60 dwellings.

Part of Site A lies within Henley Conservation Area. Part of the rest of the site is located within the setting of Henley Conservation Area.

National policy recognises that England's heritage assets as irreplaceable. Consequently, they are to be conserved in a manner appropriate to their significance. Chapter 12 of the Framework establishes the basis for the conservation of heritage assets and Core Strategy Policy CSEN3 states that heritage assets will be conserved and enhanced for their historic significance and important contribution to local character.

Nowhere does national or local strategic policy state that development cannot take place within, or within the setting of, Conservation Areas. However, as heritage assets are irreplaceable, any harm or loss resulting from development requires clear and convincing justification. Where there is substantial harm to the significance of a designated heritage asset, consent for development will be refused, unless it can be demonstrated that substantial public benefits outweigh that harm or loss. Even where less than substantial harm would arise, there is a need to weigh the public benefits of a proposal against the harm.

Thus, any application on land impacting on the Henley Conservation Area would need to overcome significant hurdles -- national and local planning policy afford a high degree of protection to heritage assets.

There is no substantive evidence before me to demonstrate that Site A could not possibly be developed without any such development being in direct conflict with the Framework and Policy CSEN3.

I recommend above that there should be an opportunity for Site A1 to be planned alongside Site A. Whilst adjacent to Site A, Site A1 does not relate to the Henley Conservation Area in the same way. Consequently, planning the two sites as one provides the opportunity to optimise potential, having regard to the Framework.

It has been suggested that Sites A and A1 are not needed. However, I am mindful of South Oxfordshire District Council's comments with regards site capacities and find

that, if both sites were removed from the Neighbourhood Plan, there is a risk that it would not meet the requirements of the Core Strategy and provide for flexibility and sustainable growth, having regard to the Framework.

In support of the allocations, a legal opinion was submitted on whether or not there is a need for the requirements of various parts of the Planning (Listed Buildings and Conservation Areas) Act 1990 to be applied. Whilst I have considered this opinion, it has little if any bearing on my findings above.

Generally, neighbourhood planning legislation is refreshingly simple. It tends not to be unnecessarily complicated, convoluted or unduly legalistic and so enables neighbourhood planners -- who more often than not, volunteer their time and resources -- to have as good an understanding of the necessary processes as anyone else. Whilst law and land use planning are necessarily intertwined, detailed legal opinions are not always necessary or helpful.

Further to all of the above, in considering Policy SP8, I am particularly mindful of Historic England's role and responsibility for looking after England's historic environment. With specific regard to Policy SP8, Historic England has no objection, but rather, it states "*We can confirm that the submission version of the plan has addressed our concern with regard the potential impact on the Henley Conservation Area.*"

The Government body responsible for the historic environment has raised no concerns that the allocation of Site A fails to meet the basic conditions.

Taking all of the above into account, no changes to Policy SP8 are recommended, other than those set out earlier.

Together, **Policies SP2, SP3, SP4, SP5, SP6, SP7, SP9 and SP10** relate to the rest of the Neighbourhood Area's allocated residential sites.

All of the sites subject to the Policies listed at the top of this page are brownfield. Consequently, their redevelopment can comprise the effective use of previously developed land, having regard to national policy.

Policy SP2 provides no definition of what "*an exceptional gateway development*" comprises and so there is a lack of clarity within the Policy for both decision makers and prospective applicants.

Furthermore, there is no need to explicitly reference other Policies, as the Neighbourhood Plan should be considered as a whole. This is a factor that applies to all of the Site Allocation Policies. Also, as worded, the Site Allocation Policies are grammatically incorrect, in that they mix up tenses.

Policy SP5 requires the Design Brief to demonstrate how Site J integrates with Site H. There is no requirement for Site H to integrate with Site J. Whilst, as worded, the delivery of Site J is subject to the opening of replacement community sports facilities, there is no substantive evidence to demonstrate that it could not possibly come forward in advance of Site H. In such a case, a requirement to integrate with something that has not yet occurred would prevent sustainable development. In addition to this, a requirement to integrate with Site H, where development is effectively free to “turn its back” on Site J, is unduly onerous.

Further to the above, it is a concern that, as worded, Policy SP5 prevents “permission” for development until replacement community sports facilities have opened. This is an inflexible approach, that may serve to prevent sustainable development from coming forward. I make a recommendation below that, ultimately achieves the purpose of securing sports facilities, but does so in a manner that takes development viability, amongst other important factors into account.

Sites U and X are located adjacent to one another, but comprise separate sites. No details are provided to demonstrate how Site U can be “*integrated*” with Site X, although I note that there is scope to ensure that the development of either site does not prejudice that of the other.

Taking all the above into account, I recommend:

- For all of the Site Allocation Policies, remove the phrases “in addition to the principles set out within Policy H2” (or, where applicable, “in addition to the principles set out within Policy H2 and Core Strategy Policy CSQ4”) and “to conform with Policy T1”
- **For all of the Site Allocation Policies, revise the grammar along the lines of “the *Design brief should demonstrate how the proposed development...Maximises...Delivers...Contributes to...Integrates with...Mitigates...etc.*” The developments have not yet occurred and a Design Brief is intended to provide guidance for the future.**
- Policy SP2, delete “delivering an exceptional gateway development to the town”
- **Policy SP5, f) replace “...site H (Mill Lane former Jet Garage) and..” with “the”**
- **Policy SP5, change d) to “Development should not start prior to...”**
- **Policy SP6, change a) to “does not prejudice the delivery of Site X”**
- **Policy SP9, change b) to “does not prejudice the delivery of Site U”**

Subject to the above, the Site Policies meet the basic conditions.

Policy H2: Design Brief

Good design is recognised by national policy as comprising

“a key aspect of sustainable development...indivisible from good planning”
(Para 56, The Framework)

and national policy requires good design to contribute positively to making places better for people (Chapter 7, The Framework).

By seeking the provision of Design Briefs for each allocated site, Policy H2 has regard to national policy. However, as worded, Policy H2 is reliant upon another Policy in another document, not within the control of the Neighbourhood Plan. Furthermore, there is no explanation or guide to how a Design Brief can be proportionate to the scale of a proposed development.

In addition to the above, Policy H2 requires potential applicants to seek to agree a Design Brief with both Henley Parish Council and South Oxfordshire District Council prior to being submitted as part of a planning application. Whilst pre-application discussion should be encouraged, I note that the approach set out in Policy H2 seeks to place a burden on another body, outside the control of the Neighbourhood Plan.

The Policy goes on to state that every allocated site *needs* to have a Design Brief that covers a wide range of factors, without providing any evidence to demonstrate that every one of these factors is relevant to the site the subject of the Design Brief. It is not clear, for example, why the development of ten dwellings at Site V needs to cover the location, type and management of open space and recreation facilities, and “connecting walking and cycling routes.” Without this clarity, Policy H2 may seek to impose requirements that are irrelevant to and/or place an undue burden on development proposals.

With regards the above, Paragraph 193 of the Framework is clear in its requirement for supporting information to be *“relevant, necessary and material to the application in question.”* In this respect, Policy H2 fails to have regard to national policy.

Furthermore, part vi) of Policy H2 effectively requires all development to enhance local character. Whilst a welcome aspiration, as set out, it amounts to an onerous requirement for all housing allocations to meet without any evidence to demonstrate that it has regard to any national policy, or is in general conformity with any local strategic policy.

I recommend:

- Policy H2, delete second sentence

- **Policy H2, change second paragraph to “Applicants should seek to discuss the content of the Design Brief with Henley Town Council and where appropriate, Harpsden Parish Council.”**
- **Change line 16 to “Where appropriate, the Design Brief should demonstrate consideration of:”**
- **Change vi) to “How the development responds to local character.”**

Subject to the above, Policy H2 meets the basic conditions. I note that the supporting text to Policy H2 simply sets out things that the Neighbourhood Plan would like to encourage and no changes are recommended.

Policy H3: Type and Size of New Housing

Generally, Policy H3 seeks to provide a wide choice of high quality homes, having regard to the Framework.

Bullet points b) and c) rely on other Policies and documents beyond the control of the Neighbourhood Plan, as do the first two paragraphs that follow the list of bullet points, as well as the final paragraph of the Policy.

I recommend:

- **Policy H3, delete b) and c)**
- **Policy H3, delete from “For sites less...Core Strategy” and delete final paragraph**

Policy H4: Provision of Facilities

Policy H4 relies upon two other Policies in the Neighbourhood Plan. I recommend deletion of Policy SCI1 below, as it does not meet the basic conditions. I recommend the deletion of the majority of Policy EN2 below, as much of the Policy fails to meet the basic conditions.

Further to the above, Policy H4 provides no detail about the level of contribution required; what the full range of facilities required are; why this full range of facilities is required; and why the full range of facilities are directly relevant to the development contributing towards them.

Policy H4 fails to provide a decision maker with a clear indication of how to react to a development proposal and thus fails to have regard to Paragraph 154 of the Framework.

Policy H4 does not meet the basic conditions. I recommend:

- Delete Policy H4 and all related text

Policy H5: Infill and self-build dwellings

It may be possible for a development to be sustainable, even where there is some degree of policy conflict. Development planning is often a balancing exercise and national policy is unambiguous in stating that sustainable development should go ahead without delay.

Taking the above into account, an approach that requires development to be sustainable and have no conflicts whatsoever with any planning policy fails to have regard to national policy and advice.

I recommend:

- Policy H5, end Policy at “...sustainable development.” (and delete rest of Policy)

National policy promotes the effective use of land and Paragraph 50 of the Framework sets out the need to plan for people wishing to build their own homes. Subject to the above, Policy H5 contributes to the achievement of sustainable development and meets the basic conditions.

Policy H6: Contingency

Policy H6 is not a land use planning policy. It is a statement setting out possible future actions by Henley Town Council and Harpsden Parish Council. I recommend:

- Delete Policy H6 and create an “*Action Point*.” Move the text of the deleted Policy to the Action Point, but delete the last sentence of the first paragraph.

Transport and Movement

Policy T1: Impact of development on the transport network

Parts 1 and 2 of Policy T1 are reliant upon other Policies or other bodies and are beyond the control of the Neighbourhood Plan. Parts 3 and 4 of Policy T1 state that something should happen, but provides no mechanism for it to do so. Part 6 of Policy T1 places an unduly onerous requirement upon all development, but is clearly not relevant to all development.

Notwithstanding the above, whilst confusingly worded, the remaining parts of Policy T1 seek to promote sustainable transport, having regard to Chapter 4 of the Framework.

As worded, Part 5 is somewhat vague, but can appropriately be linked to allocated development sites. It is inappropriate for the final part of the Policy to apply to all forms of development – for example, on what possible basis would a household extension be encouraged to improve public transport including rail ?

No indication is provided as to how the Neighbourhood Plan will “encourage” something to happen. Also, the Neighbourhood Plan provides no definition of what a “car club” comprises – for example, the Morris Minor Owners Club is a car club.

I recommend:

- Policy T1, delete parts 1, 2, 3, 4 and 6
- **Policy T1, change Part 5 to “Allocated residential development sites will be required to provide a Travel Plan, setting out how opportunities...development.”**
- **Policy T1, change the last part of the Policy to “The provision of new or improved walking or cycling routes; improvements to public transport; and the incorporation of electric car charging points, will be supported.” Add to the final sentence “Until Community Infrastructure Levy (CIL) is in place, financial contributions from allocated residential sites will be sought for...Plan.”**

Subject to the above, Policy T1 meets the basic conditions. The supporting text to Policy T1 provides interesting background information and no changes are recommended.

Policy T2: Cycling Routes

Chapter 4 of the Framework encourages sustainable modes of transport and Policy T2 has regard to this.

It is not clear how the Neighbourhood Plan will encourage something to take place, and no information is provided to set out how the Neighbourhood Plan will “*ensure that Henley is well connected, safe and accessible by bicycle.*” I recommend:

- Policy T2, delete “and encourage...bicycle.”

Subject to the above, Policy T2 meets the basic conditions.



Social and Community Infrastructure

Policy SCI1: Provision of social and community infrastructure

Policy SCI1 relies upon a document that doesn't exist and a Policy in another document, beyond the control of the Neighbourhood Plan. It requires all development to contribute to an undefined "full range of facilities required," regardless of whether such a contribution is necessary to make the development acceptable in planning terms, directly related to the development, or fairly and reasonably related in scale and kind to the development.

Consequently, Policy SCI1 is unduly onerous and fails to have regard to national policy. It does not meet the basic conditions. I recommend:

- Delete Policy SCI1 and related text

Policy SCI2: Comprehensive Renewal of Gillotts School

Policy SCI2 refers to an area defined on the Key Diagram. As noted above, there is no Key Diagram in the Neighbourhood Plan. Furthermore, the plan on pages 30 and 31 of the Neighbourhood Plan is at an inappropriate scale to be considered capable of "defining" a site with any relevant precision.

There is no indication in Policy SCI2 of how the Neighbourhood Plan will "*ensure*" the delivery of "*a first class facility...in cutting edge learning,*" whatever that might be.

Much of Policy SCI2 comprises a reference to another Policy in the Neighbourhood Plan and the repetition of part of the Framework.

However, the Framework affords great weight to the need to expand or alter schools (Paragraph 72) and supports the replacement of sports facilities with equivalent or better facilities (Paragraph 74), and part of the Policy has regard to this. I recommend:

- **Policy SCI2, change wording to "*The renewal of Gillotts School will be supported subject to it resulting in the provision of alternative enhanced sports facilities to those that currently exist.*"**

Subject to the above, Policy SCI2 meets the basic conditions.

Policy SCI3: Renewal and enhancement of community facilities

Policy SCI3 refers to community facilities identified on the Key Diagram. Notwithstanding the points above, the plan on pages 30 and 31 of the Neighbourhood Plan shows two yellow dots with orange circles around them in locations not too distant from the centre of Henley. These dots apparently correspond to “Community facilities with potential for renewal and enhancement” under the title “Keys.” No other detail is provided. This does not constitute the appropriate identification of community facilities.

The supporting text names community facilities. Rather than refer to something that is not properly identified, Policy SCI3 should more appropriately refer to specific facilities.

Chapter 8 of the Framework promotes healthy communities and Policy SCI3 generally has regard to this. I recommend:

- **Policy SCI3, change wording to “*The renewal and enhancement of the community facilities used by the following community groups, will be supported: Henley on Thames Social Club for the Over 60s; Henley on Thames Scouts; and Headway Thames Valley.*”**

Policy SCI4: Community Right to Build

Policy SCI4 supports proposals based on the Community Right to Build. The Policy has regard to national policy and advice and subject to the recommendations below, meets the basic conditions.

- Policy SCI4, end Policy “...will be *supported.*” (and delete the Policy text that follows)

Policy SCI5: Henley College

The Framework is positive with regards to development that will widen choice in education and Policy SCI5 has regard to this. The Policy seeks to support the redevelopment of Henley College’s sites in order to meet accommodation needs. However, as worded, it comprises a partial statement and not a land use planning policy.

Further to the above, the Policy does not define what “an educational facility of the highest standard” actually is. Consequently, it does not provide decision makers with a clear indication of how to react to a development proposal.

There is no detailed information setting out what form future redevelopment might take. Rather than include generalised comments, it is appropriate for the

Neighbourhood Plan to be specific. I note that Henley College has commented that the Neighbourhood Plan does not reflect the College's position.

I recommend:

- **Policy SCI5, re--word as *“The redevelopment of Henley College, to meet educational accommodation needs, will be supported.”***
- Replace Para 7.35 with “This Policy recognises Henley College as an important asset to the town.” Delete all other text.

Retail and town centre

Policy TCE1: Henley Town Centre

Policy TCE1 refers to a Key Diagram inset. The reference should more appropriately be to the Town Centre Plan on page 47. I note that the Town Centre Plan's reference to another plan in another document is confusing and unnecessary.

Generally, Policy TCE1 supports the vitality of the town centre, having regard to Chapter 2 of the Framework. It emphasises the importance of focusing development within Henley Town Centre, but does not prevent sustainable development from coming forward outside it.

The Framework sets a threshold for retail impact assessments – for development outside of town centres – of 2,500 square metres. Policy TCE1 seeks to establish a locally set threshold of 500 square metres. Whilst national policy supports the setting of local thresholds, there is no substantive evidence to demonstrate why the threshold in the Neighbourhood Area should be as low as 500 square metres. This is so significantly different to the national policy threshold that, without substantive reasoning and detailed supporting evidence, it leads Policy TCE1 to fail to meet the basic conditions.

I recommend:

- **Policy TCE1, replace the first sentence with "*The Henley Town Centre boundary is shown on the Henley Town Centre Plan.*" Delete the reference to the Core Strategy under the Town Centre Plan.**
- Policy TCE1, change "500sqm" to "2500sqm"

Policy TCE2: Market Place Hub

The first sentence of this Policy is vague and may have unintended consequences. For example, as worded, Policy TCE2 supports any form of development, so long as it would support Market Square as a focal hub. Also, the bullet points would benefit from clearer wording. Notwithstanding these two comments, the general aim of Policy TCE2 contributes to the achievement of sustainable development. I recommend:

- **Policy TCE2, delete first sentence and change second sentence to: "*The following development will be supported within Market Square:*"**
- **Policy TCE2, change bullet points to "*a) Use Class A3 Food and Drink uses, particularly in the northern part of the square; b) market stalls; c) secure cycle storage, particularly a covered facility.*"**

Policy TCE3: Hotel and bed space

The Framework supports tourism in town centres (Paragraph 23). The Policy has regard to this, but it is not clear what “*reinforcing bed provision*” actually means. There is no need to reference another Policy in the Neighbourhood Plan and in any case, it is not clear why only one other Policy would be relevant to tourism related development.

I recommend:

- **Policy TCE3, re-word as “*Provision of tourist accommodation within the town centre will be supported.*”**

Policy TCE4: Employment and residential above shops

As above, the Framework supports the vitality of town centres. This Policy has regard to national policy and contributes to the achievement of sustainable development. It meets the basic conditions.

Policy TCE5: Town Centre Car Park Management

The Neighbourhood Plan would like to see the introduction of a town centre car park management system. Policy TCE5 is not a land use planning policy. It sets out a local aspiration and references matters that can be sought by the Town Council but not necessarily controlled by the Neighbourhood Plan. I recommend:

- Delete Policy TCE5
- **Retain wording (but remove from box, so it is clear that the wording does not comprise a policy) and entitle as “*Community Action: Town Centre Car Park Management*”**



Policy TCE6: 16--18 Hart Street (Former Latino's Night Club) (Site AE)

This is a positive development Policy. It promotes brownfield development and with the exception of some unclear wording, it meets the basic conditions.

The second part of the Policy does not set out any meaningful or controllable requirements. It simply asks for a prospective developer to demonstrate how various things have been considered.

I recommend:

- Policy TCE6, delete “as designated in the Key Diagram”
- **Policy TCE6, delete from “Proposals for this site...” to the end of the Policy**

Policy TCE7: Town Centre Action Plan

It is not clear why every development within the town centre – or which may have some possible effect on the town centre (there is no definition of what such development might be) – needs to identify how it has considered every action of a Town Centre Action Plan, which itself, changes every year. There is no information to demonstrate that all of these actions within the Town Centre Action Plan are, or will be, relevant to every such development. Consequently, the requirements of the Policy are unduly onerous.

In addition to the above, there is no indication of what might happen if every action of the Town Centre Action Plan has not been considered – nor what benefits might arise from the consideration of every action.

To add to the confusion, the supporting text then goes on to provide a long list of fourteen actions that do not even form part of the Action Plan.

I recommend:

- Delete Policy TCE7
- **Create a new “Community Action: Town Centre Action Plan” with new text at the start of Paragraph 7.40 “The Town and Parish Councils will seek to encourage development that takes into account town centre actions listed in the Henley Town Centre Action Plan, as well as those listed below...” (retain all of the text in Paragraph 7.40)**

Employment

Policy E1: Supporting Henley's Economy

The first part of Policy E1 is reliant upon other Policies within another document beyond the control of the Neighbourhood Plan. The Policy then becomes confusing. It states that planning permission will be granted, but then goes on to state that certain uses will be prioritised. If something is granted, it is granted. The reference to prioritisation is therefore meaningless. This approach fails to provide decision makers with a clear indication of how to consider a development proposal.

The Policy states that the provision of office space within Henley will be granted planning permission. This is a wide and vague statement that is entirely reliant upon other Policies. It fails to provide prospective applicants with any clarity. For example, would a ten storey office block in a residential cul de sac be granted permission ?

The Policy then goes on to refer to specific sites that are considered in more appropriate detail in individual Policies elsewhere in the Neighbourhood Plan.

Taken as a whole, Policy E1 is poorly conceived, poorly worded and fails to meet the basic conditions. The Policy attempts to achieve too much and the result is confusing and inappropriate. I note that the Framework promotes the effective use of land and supports economic growth and my recommendation below takes this into account.

I recommend:

Policy E1, re--word as “*Development at Reading Road Industrial Estate that supports its role as the Neighbourhood Area’s main employment area will be supported.*”

Policy E2: Former Wyevale Garden Centre (Site P)

This Policy supports the re--use of a brownfield site for employment and for non--residential institutions. I note that Site P is a readily available brownfield development site and an objection considers that the site should be allocated for a C2 care home use. However, there is no substantive evidence before me to demonstrate that, in failing to allocate a site for a C2 care home, the Neighbourhood Plan necessarily fails to meet the basic conditions. As an aside, I note that there is no substantive evidence to demonstrate that a C2 care home would necessarily integrate well with employment uses and would not provide any constraint on employment uses coming forward.

The plan--makers consider that Site P is well--placed to contribute to the employment and culture of the local area and there is nothing to demonstrate that this is not the case. National policy supports the effective use of brownfield land and development that contributes to economic growth and healthy communities (with specific

reference to cultural buildings in Paragraph 70). There is nothing to clearly demonstrate that it would not be possible for Site P to viably deliver B1, B2 and potentially, D1 development. I am also mindful that the Neighbourhood Plan allocates a number of employment sites for residential use and that Site P provides alternative land for employment use in the Neighbourhood Area. In this regard, Policy E2 is in general conformity with Core Strategy policy CSSHEN1.

However, the Policy refers to another Policy in another Plan and in point e) sets out a viability requirement that goes beyond the control of land use planning policy. I recommend:

- Policy E2, delete “in addition...CSQ4,”
- **Policy E2, delete bullet point e)**

Subject to the above, Policy E2 contributes to the achievement of sustainable development and meets the basic conditions.

Policy E3: Henley Railway Station Car Park, South (Site W) and

The Framework is explicit in directing development away from areas at risk of flooding where development is not necessary. There is insufficient evidence to demonstrate that Site W can meet the sequential test set out in Chapter 10 of the Framework and as such, I find that Policy E3 fails to have regard to national policy. I recommend:

- Delete Policy E3

I note that the above recommendation does not prevent development from possibly coming forward at Site W, but that any development proposal would need to demonstrate that the relevant sequential test has been met.

Policy E4: Land at Newtown Road (Site AD)

This policy allocates brownfield land for development and as such, contributes to the achievement of sustainable development. No changes are recommended.

Environment

Policy EN1: Environmental Protection

Generally, Policy EN1 seeks to provide protection to environmental resources and in so doing, it contributes to the achievement of sustainable development

However, as worded, the Policy is unduly onerous and fails to justify why it goes well beyond any requirements set out in national policy or in the strategic policies of the Core Strategy. For example, it requires all development to enhance all watercourses, banks and associated river corridors; and requires all development, including for example, a household extension, to seek to improve public access to Harpsden Valley and enhance key viewing corridors.

The Policy attempts to achieve too much and ends up being unworkable, impossible to implement and largely irrelevant. This is a shame, as the aims of the Policy in respect of protecting key views have been the subject of much work.

In making my recommendations below, I note that the AONB is already afforded significant protection by national and local planning policy.

There is no evidence to demonstrate that all development impacting on viewing corridors (as opposed to all development) can enhance the viewing corridors. Consequently, it is inappropriate for this to be a requirement of the Neighbourhood Plan.

Some development in viewing corridors may comprise relatively minor development. It would be unduly onerous, for example, to require an application for a household extension to provide a Landscape Visual Impact Assessment as suggested in the supporting text. In this regard, I note that the supporting text is written as though it forms part of the Policy, which it does not.

The Plan on page 55 simply identifies viewing corridors. It does not set out Key Views, as suggested. The “Key Views” photographs show several nice views, but they do not provide precise information with respect to the viewing corridors. This is a problem. It is not clear how development can conserve something that is not, itself, clearly defined.

The supporting text states that “*the viewing corridors are fully described and set out in the supporting evidence base.*” I have considered the Viewing Corridors document that supported the Neighbourhood Plan. Whilst interesting, it is a brief, six page document that does not, in any way, comprise a detailed and precise definition of Viewing Corridors and nor can it be considered a clear and comprehensive guide for development.

Taking all of the above into account, I am not satisfied that there is sufficient detailed evidence to form the basis of a viewing corridor Policy, such that development within, or outside, the identified viewing corridors must preserve views within them, to them, or from them. Consequently, Policy EN1 does not meet the basic conditions as it fails to provide prospective applicants with sufficient detail, or decision makers with a clear indication of how they should react to a development proposal.

I acknowledge that the deletion of this Policy will disappoint plan-makers. However, I note that the work undertaken to date provides an excellent starting point for the creation of an evidence base upon which to found future planning policy.

I recommend:

- **Delete Policy EN1, replace with “Community Action: Viewing Corridors” and add text “The Town and Parish Councils will seek to progress the significant work already undertaken on Viewing Corridors within the Neighbourhood Area, with the aim of providing precise information that can help to provide the basis of future planning policy.”**
- Delete Paragraphs 7.46, 7.48, 7.49, 7.50 and 7.51
- **Introduce new sentence at start of Paragraph 7.45, “The viewing corridor areas are shown on the following plan and important views in the Neighbourhood Area shown on the following pages. The Town and Parish Council will seek to encourage development proposals within these areas to take full account of important views.”**

Policy EN2: New and Replacement Green Infrastructure and Public Open Spaces

It is not clear why Policy EN2 applies to residential developments of over 10 dwellings and it is not clear what contributions will be required from any such development. Green infrastructure, as defined, appears to relate to many, various things but nothing specific. The Policy is reliant upon another strategy controlled by another body.

Taking the above into account, Policy EN2 is unclear and fails to have regard to Paragraphs 203--206 of the Framework. It does not meet the basic conditions. I recommend:

- Delete Policy EN2

Policy EN3: Improve Existing Green Spaces

Policy EN3 is reliant upon a Policy recommended for deletion. Further to this, the Policy provides little clarity with regards what specific contributions will comprise and upon what basis they will be calculated. It fails to have regard to Paragraphs 203--206 of the Framework and does not meet the basic conditions.

- Delete Policy EN3 and supporting text

In recommending the deletion of Policies EN2 and EN3 I note that the more detailed site--specific policies in the Neighbourhood Plan refer explicitly to green infrastructure.

Policy EN4: Biodiversity

This is a sweeping Policy that places an onerous requirement on all development to enhance rural and urban biodiversity.

In reality, many development proposals will not be able to enhance rural and urban biodiversity, and nor will it be relevant for them to do so.

The general intention of the Policy – to protect and enhance biodiversity – has regard to the aims of national policy, as set out in Chapter 11 of the Framework (Conserving and enhancing the natural environment).

I recommend:

- **Policy EN4, change to “*The protection and enhancement of urban and rural biodiversity will be supported. Net gains in biodiversity, through the creation of new habitats; the enhancement of existing sites; and the development and implementation of ecological management plans, will be supported.*”**

Subject to the above, Policy EN4 contributes to the achievement of sustainable development.

Policy EN5: Historic Environment

Policy EN5 partially repeats guidance set out in the Framework. However, in so doing, it provides an incomplete approach to the protection of heritage assets. It provides no indication as to how development proposals will be considered. Heritage assets are recognised by the Framework (Chapter 12) as irreplaceable. As worded, Policy EN5 fails to have regard to the Framework and does not contribute to the achievement of sustainable development.

I recommend:

- Delete Policy EN5

Policy EN6: Contamination

This Policy concerns matters that are the responsibility of others, and not under the control of the Neighbourhood Plan. I recommend:

- Delete Policy EN6

Policy EN7: Water Resources

This Policy concerns matters that are the responsibility of others and not under the control of the Neighbourhood Plan. I recommend:

- Delete Policy EN7



Design Quality and Sustainability

Policy DQS1: Local Character

As noted earlier in this Report, good design is recognised by national policy as comprising a key aspect of sustainable development. It is indivisible from good planning and national policy requires good design to contribute positively to making places better for people (Para 56, the Framework).

Policy DQS1 seeks to ensure that design considerations make a positive contribution to local character in the Neighbourhood Area. In this way, the Policy has regard to national policy and contributes towards the achievement of sustainable development. It is in general conformity with Core Strategy policy CSQ3, which protects local character.

The Policy unnecessarily refers to other Policies and the second part could be made clearer for decision makers and prospective applicants. I note that the Chilterns Building Design Guide is referenced in the supporting text. I recommend:

- **Policy DQS1, change second sentence to “*Where Design Briefs are required, they should demonstrate how the proposed development will respond to local character in terms of design and materials.*”**

Policy DQS2: Low Carbon Sustainable Development

National advice establishes that:

“...qualifying bodies preparing neighbourhood plans should not set in their emerging neighbourhood plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development.” (Ministerial Statement, 25 March 2015)

The Policy does not meet the basic conditions. I recommend:

- Delete Policy DQS2 (but retain Paragraph 7.55)

Policy DSQ3 Local Sourcing of Construction Materials and Labour

The Neighbourhood Plan does not define what it means by “local construction materials” and “local labour” and provides no information to demonstrate the existence of relevant and appropriate local labour and local construction materials. Furthermore, there is no indication of what “will be maximised” means or how it will be measured.

Consequently, it is difficult to understand how Policy DSQ3 can be implemented. It does not provide clear guidance for prospective applicants and does not provide decision makers with a clear indication of how to react to a development proposal.

I recommend:

- Delete Policy DQS3

Policy DQS4: Community Energy Projects

As worded, Policy DQS4 could have unintended consequences. For example, it would support the development of 50,000 new homes, so long as a community energy projects were delivered.

However, the general aims of Policy DQS4 have regard to national policy, which supports the delivery of renewable and low carbon energy (Paragraph 93). I recommend:

- **Policy DQS4, re-word as “Community energy projects will be supported.”**

Subject to the above, Policy DQS4 contributes to the achievement of sustainable development and meets the basic conditions.

7. Neighbourhood Plan – Other Matters

The Delivery section of the Neighbourhood Plan is potentially confusing as the text appears to suggest that the Town and Parish Council will have a formal monitoring role, alongside South Oxfordshire District Council. This is not quite the case, although the Town and Parish Council will, of course, be free to monitor the impacts of the Neighbourhood Plan.

The text then refers to Policy SCI1, the deletion of which is recommended and goes on to state that key local items listed on page 79 “are established in various” Neighbourhood Plan policies. This is not the case. Paragraph 9.4 then refers to matters not under the control of the Neighbourhood Plan. The text also refers to the “adoption” of the Neighbourhood Plan, whereas, if successful at Referendum, the Neighbourhood Plan will be “made” rather than adopted.

I recommend the following:

- **Delete all text on page 79 with the exception of the list of bullet points and Paragraph 9.5. Above these, add “*The Neighbourhood Plan, once made, will provide policies that will form part of the development plan for the area and will thus help to determine planning applications. The Town and Parish Councils will monitor the impact of the policies of the Neighbourhood Plan.*”**
- ***The following items have been identified to help guide any spending by the Town and Parish Councils of funds resulting from Community Infrastructure Levy (CIL) and/or Section 106 Agreement payments: (retain list in 9.2)”***



8. Summary

I have recommended a number of modifications further to consideration of the Joint Henley and Harpsden Neighbourhood Plan against the basic conditions.

Subject to these modifications, the Joint Henley and Harpsden Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Taking the above into account, I find that the Joint Henley and Harpsden Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

I recommend to South Oxfordshire District Council that, subject to the modifications proposed, the **Henley and Harpsden Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area -- I am required to consider whether the Referendum Area should be extended beyond the Joint Henley and Harpsden Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Joint Henley and Harpsden Neighbourhood Area as approved by South Oxfordshire District Council on 10 June 2013.

Nigel McGurk, November 2015 Erimax –
Land, Planning and Communities

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RTRTR

REGULATION 14 CONSULTATION
HENLEY AND HARPSDEN
NEIGHBOURHOOD PLAN
NOVEMBER 2021

Appendix B:
REPRESENTATION REGARDING THE
SITE AT CROSSWAYS, LOWER SHIPLAKE



Woolf Bond Planning
Chartered Town Planning Consultants

Our Ref: DB/GR/8109

12th November 2021

New Joint Henley and Harpsden Neighbourhood Plan (2020-2035)
Henley Town Council
Town Hall
Market Place
Henley-on-Thames
RG9 2AQ

Sent in electronic format only via enquiries@henleytowncouncil.gov.uk

Dear Sir/Madam

CONSULTATION ON THE DRAFT JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN 2020-2035

LAND NORTH OF CROSSWAYS, READING ROAD < SHIPLAKE

On behalf of my client, Westbourne Homes and Debrecq (Crossways) Ltd, I am writing to provide representations on the draft Neighbourhood Plan.

My client controls land to the north of Crossways, Reading Road, Shiplake extending to approximately 1.1ha. Through the consultation on the Draft Neighbourhood Plan, the site has been omitted as a housing allocation although it was assessed as consistent with the approach of the development plan for potential housing allocations. However, this should be rectified, and the site included as an allocated site, especially as this will contribute towards addressing the deficit that arises once the unjustified allocations in the Plan, particularly that at Highlands Farm (entailing major development on a green field site within the Chilterns AONB) is omitted.

The attached location plan shows the extent of the site and immediate context of the surrounding area. The site is considered to be appropriate for residential development for at least 11 dwellings and provides a genuinely viable and deliverable development opportunity. The representations are supported by a number of documents:

- Examiners Report on current Joint Henley & Harpsden Neighbourhood Plan;
- Site location plan for land north of Crossways

- Site layout submitted for application P21/S4616/FUL for erection of 11 dwellings on land north of Crossways.

At the outset I object to the amendments made to the Neighbourhood Plan (NP). For the reasons set out in the submissions below, I consider Land at Crossways (Site NEW1 in Site Assessment Report) should be included as an allocation for at least 11 dwellings. Furthermore, for the reasons detailed in this Statement, the selection of the land at Highlands Farm as a housing allocation has not been justified by the Neighbourhood Plan group since it entails major development (at least 100 dwellings and employment) on a greenfield site within the AONB. This site cannot be regarded as being within the built up extent of Henley by virtue of the clear width of the band separating the existing and committed development at the farm (on the previously developed area allocated in the existing Neighbourhood Plan) from the dwellings in Henley. In contrast, the site at Crossways which has smaller distances from existing buildings and is enclosed on at least three sides by existing and committed development was discounted as not being a location for development. This is therefore a clear illustration of the inconsistency of the approach to site selection where a greenfield site in the AONB is selected in preference to a site outside of this designation.

Representation on draft housing allocations in policy DS1.

Through the Pre-Submission Neighbourhood Plan, a number of sites are proposed for allocation to deliver additional homes across the joint plan area. Whilst we concur that it is essential that additional homes are allocated in the Plan, both to achieve the minimum requirements of policies STRAT1 and H3 of the South Oxfordshire Local Plan (December 2020), together with the flexibility within South Oxfordshire Local Plan policy H3 to provide further homes to contribute towards the need for affordable homes, we emphasize that it is important to assess the suitability of locations having regard to the clear guidance in the NPPF and the Local Plan which detail a number of factors which are significant constraints to development (as detailed in footnote 7 of the NPPF). Of particular note to the emerging Neighbourhood Plan is the clear emphasis on avoiding major development within the AONB, especially when there are clear opportunities outside which were assessed as suitable, such as our clients' site at Crossways, Lower Shiplake. Such suitable sites should be included as allocations in advance of any site where development would conflict with the approach of the NPPF and Local Plan.

This is especially illustrated by the identification of the land at Highlands Farm for around 110 dwellings, since this entails major development on a greenfield site within the AONB. This and other sites inconsistent with the approach of the NPPF and Local Plan should therefore be omitted and replaced with sites which are considered suitable, whilst still ensuring that the minimum of at least 1,285 dwellings are built in Henley-on-Thames over the period 2011 to 2035 (Policy H3).

Observations on Highlands Farm (Site M1) (Policy DS7)

The South Oxfordshire Local Plan (appendix 14) indicates that policies STRAT1, H3, HEN1 and ENV1 are strategic and therefore pursuant to guidance¹ and regulations², the emerging Neighbourhood Plan should confirm with them. Of particular relevance to the Highlands Farm site, is that the Local Plan and NPPF (paragraphs 176 and 177) are clear that land within Areas of Outstanding Natural Beauty (AONB) should not be considered for major development, other than in exceptional circumstances and where it is in the public interest.

As the Pre-Submission Plan envisages development of around 110 dwellings together with 1 ha of employment and a relocated Chiltern Centre on the Highlands Farm site (all within the Chilterns AONB), the document should be accompanied by the necessary evidence to justify this location, especially as there is other land within the Joint Neighbourhood Plan area outside of the AONB which could readily be allocated to address both the housing requirements in Local Plan policy STRAT1 and H3 together with the flexibility for further sites to contribute towards affordable housing as envisaged by policy H3. These areas include those assessed as suitable within the detailed Site Assessment Report, which includes with the land controlled by our clients north of Crossways as acknowledged on page 74 of the Baseline Report.

Policy STRAT1, particularly criterion ix emphasises the need to protect and enhance the AONB as detailed below.

1. Proposals for development in South Oxfordshire will be assessed using national policy and guidance and the whole of the Development Plan* and should be consistent with the overall strategy of:

- i) focusing major new development in Science Vale including sustainable growth at Didcot Garden Town and Culham so that this area can play an enhanced role in providing homes, jobs and services with improved transport connectivity;**
- ii) providing strategic allocations at Chalgrove, Culham, Berinsfield, Grenoble Road, Northfield, North of Bayswater Brook and Wheatley including necessary infrastructure and community facilities;**
- iii) close working with partner agencies, neighbouring local authorities, communities and other stakeholders to ensure the timely delivery of our strategy, which will deliver a significant amount of growth beyond the end of the plan period;**
- iv) supporting and enhancing the economic and social dependencies between our towns and villages;**
- v) supporting the roles of Henley-on-Thames, Thame and Wallingford by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and**

¹ NPPF, paragraph 29

² Basic conditions for a Neighbourhood Plan

- mixed-use developments and by providing new homes, jobs, services and infrastructure;
- vi) meeting unmet housing needs of Oxford City on strategic allocations adjacent to the boundary of Oxford near to where that need arises;
 - vii) supporting and enhancing the roles of the Larger Villages of Benson, Berinsfield, Chalgrove, Chinnor, Cholsey, Crowmarsh Gifford, Goring-on-Thames, Nettlebed, Sonning Common, Watlington, Wheatley and Woodcote as local service centres;
 - viii) supporting Smaller and Other Villages by allowing for limited amounts of housing and employment to help secure the provision and retention of services;
 - ix) protecting and enhancing the countryside and particularly those areas within the two AONBs and Oxford Green Belt by ensuring that outside of the towns and villages any change relates to very specific needs such as those of the agricultural industry or enhancement of the environment;
 - x) supporting and enhancing our historic environment; and
 - xi) contributing to tackling climate change.

The approach of policy STRAT1 concerning protecting and enhancing the AONB is further reinforced by the approach of strategic policy ENV1. This states:

Some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones. Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB, a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable. Other villages are unconstrained and can plan for more than 15% growth. The level of growth proposed should be evidenced within the Neighbourhood Development Plan with local communities helping to shape the development of their village. Ultimately the detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of capacity, whether this is to support a higher or lower number than that provided in Table 4f: Provision of homes at Larger Villages. Neighbourhood planning groups will need to cooperate with infrastructure providers and statutory consultees to provide this evidence, and develop viable solutions for any infrastructure provision that is needed.

Although this paragraph refers to villages, given the clear guidance in the NPPF paragraphs 176 and 177) together with Local Plan policies STRAT1 and ENV1, it is essential that to support major development (such as that associated with the draft allocation at Highlands Farm), a Landscape and Visual Impact Assessment is undertaken. The Examiner's Report (page 18) on the current Joint Neighbourhood Plan recognises the impact that the redevelopment of the brownfield site envisaged was a concern of the Chilterns Conservation Board as indicated in his summary:

With regards to Site M, the Chilterns Conservation Board has expressed concern regarding potential impact on the AONB. The Framework affords great weight to conserving landscape and scenic beauty in AONBs. In this respect, I agree that it would be clearer for Policy SP1 to separate out matters relating to impact on the AONB to those relating to green infrastructure and biodiversity. However, having regard to Paragraph 59 of the Framework, which states that “*design policies should avoid unnecessary prescription or detail,*” I consider that the Policy would not meet the basic conditions if it was overly prescriptive. I take these factors into account in making the recommendations below.

The modification to the allocation policy for Highlands Farm required by the examiner was detailed on page 19 of his report and confirmed:

Policy SP1, end f) at “...boundary edges.” Introduce a new bullet point, below, stating “*Ensures that the development has no greater impact on the AONB than the existing development on the site; and that development conserves and where possible, enhances the landscape and scenic beauty of the AONB.*” Remove apostrophe in 8.2 (and 7.54) and refer to “AONB” in 8.23 (and 4.31).

As the current allocated site at Highlands Farm in the Neighbourhood Plan included previously developed land, as recognised by the examiner redevelopment was feasible whilst ensuring development had no greater impact upon the AONB than that which was already on the site. However, the draft allocation for 110 dwellings, 1 ha of employment and a relocated Chilterns Centre involves development of a greenfield area of the AONB, for which no visual impact assessment has been undertaken. As indicated, this is a clear requirement for Neighbourhood Plans where such development is envisaged taking account of the conclusions of the previous examiner, together with the guidance in the NPPF and Local Plan.

The Baseline Report (page 84) provides an appraisal of the Landscape Impact of the potential development of Highlands Farm (site ref 853a) which states:

It is considered that the public benefit provided through this scheme would outweigh harm to the Area of Outstanding Natural Beauty (AONB). The landscape sensitivity is influenced by the new housing being built on the existing allocation Site M: Highlands Farm. Any impact could be mitigated by existing and new hedges and tree planting within the site.

This is not considered to be an adequate and sufficient landscape assessment to support the major development envisaged in the Pre-Submission Draft Neighbourhood Plan, taking account the clear guidance in the NPPF and Local Plan together with the clear concerns of the Chilterns Conservation Board on the previously

plan, albeit that this was with respect of the redevelopment of a previously developed site, rather than virgin green field land as now envisaged. Whilst development at Highlands Farm could provide affordable housing, thereby addressing a clear need for this in Henley, other sites assessed as suitable in the Appraisal (such as at Crossways) can also contribute towards this need, thereby avoiding harm to the AONB. The emerging Neighbourhood Plan has not demonstrated that the clear benefits of providing affordable housing on suitable sites outside of the AONB (like at Crossways) could not address the needs without relying upon those within the designation.

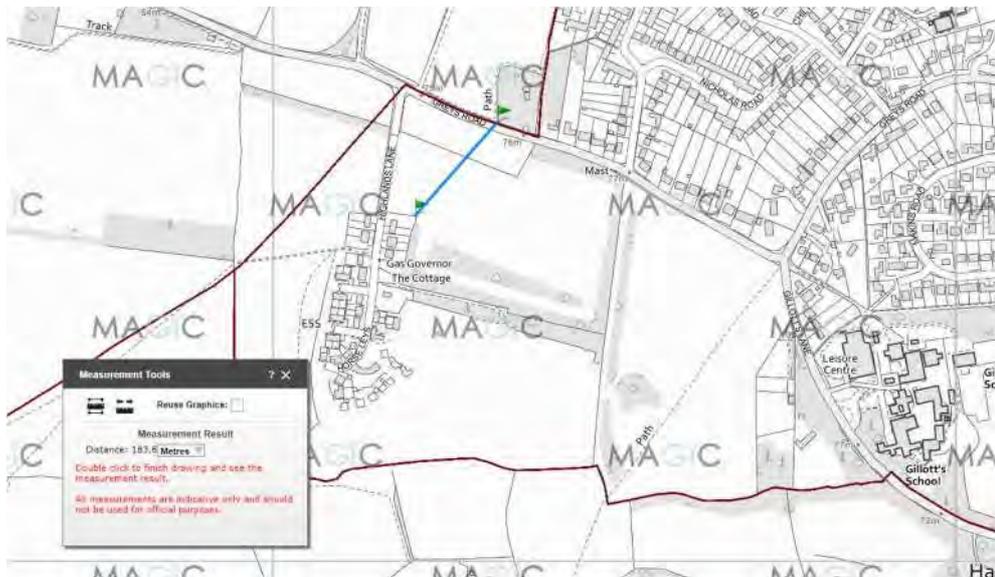
Furthermore, the Baseline Report (page 83) indicates that the Site Assessment by AECOM concluded:

853a is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site (once the wider site construction is complete) is within the built-up area.

The area put forward in the Neighbourhood Plan Call for Sites (853a) is suitable for allocation as there are no major constraints and once the other part of the site is completed, it will be within the built-up area.

The site's suitability would remain the same should the emerging plan become adopted policy, as it is in conformity with Policy H1 as the site is appropriate infilling within the existing built-up area.

However, the assessment above does not acknowledge that site 853a lies within the Chilterns AONB, which is a significant constraint (as listed in footnote 7 of the NPPF). Furthermore, whilst it suggests that once development of the existing area allocated in the Neighbourhood Plan is complete, the site would lie within the built-up area. However, as indicated below, the development approved (alongside the existing homes on Highlands Lane) at Highlands Farm lies at least 180m from the existing buildings along Greys Road with clear undeveloped areas to the east and west. As no development is envisaged on the land east and west of the existing Highlands Farm site which would result in the encircling of it by development, it cannot be regarded as being within the existing built-up area. This is shown by the map below indicating that the curtilages are at least 180m apart, with the buildings a greater distance.



Measurement to eastern part of developed site

The suitability of the Highlands Farm in the site assessment report, even though it has clear open areas on the eastern and western boundaries contrasts with the appraisal of the land at Crossways. For this, the assessment (page 91) states:

The site is located adjacent to the settlement of Shiplake which is not a location for growth as set out in the Local Plan Strategy (STRAT1) and the Neighbourhood Plan.

As there are preferable sites available that are better related to Henley that can deliver the quantum of development required, it is not considered to be suitable for allocation in the Neighbourhood Plan.

A planning application on this site for housing was refused planning permission (P20/S2103/FUL) by SODC, the SODC planning officer stated: "SODLP Policy H16 defines infill development as "the filling of a small gap in an otherwise continuous built-up frontage or on other sites within settlements where the site is closely surrounded by buildings..." The site is currently open to the north. Even if Thames Farm is built out, it could not be said that the site is a small gap in a continuous built-up frontage. The Thames Farm development itself would be set back from the road by between 55 and 65m. The dwelling to the south (Corner House) fronts onto Woodlands Road, with around 85m of its garden along the A4155. The site is not closely surrounded by buildings as the large gardens to the south and paddocks to the west of the site mean there is an open aspect along these boundaries". It is considered that these reasons would still apply when considering the site for 11 homes.

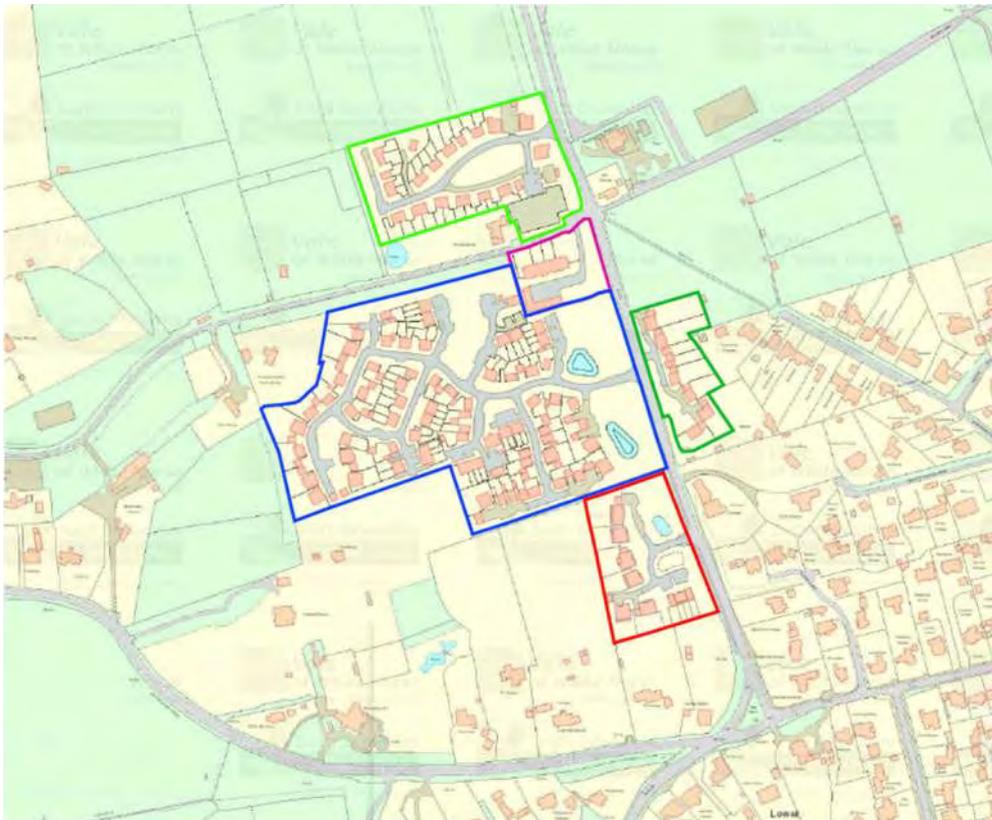
It is considered that the site is situated beyond the edge of the currently built-up area, in a transitional location that is more rural in character. As such, it is more akin to the countryside than a built-up area, such as a settlement.

The site would not fill a small gap in an otherwise continuous built-up frontage, and as the site is not located within a settlement, the proposal would conflict with the relevant provisions of the Local Plan (including Policy H16) and the Neighbourhood Plan objectives.

Furthermore, The Local Plan strategy and Neighbourhood Plan seek to deliver sustainable development by directing growth to the main town of Henley-on-Thames (a requirement of 115 dwellings), it does not direct growth to Shiplake. Shiplake does not have a housing requirement through the Local Plan.

It is therefore considered that the site would not be within the built-up area as stated by AECOM and would not accord with the overall strategy for the Neighbourhood Plan and Local Plan and not constitute sustainable development.

The Baseline assessment has discounted the suitability of the Crossways site, although as indicated on the Context Plan, it is enclosed by existing and committed development on three sides (north, south and east). This therefore contrast to the Highlands Farm northern field which only has development to the north and south (as indicated above).



Context plan showing existing and committed development surrounding the Crossways site (edged red).

The Baseline Report indicates that the Crossways site was discounted as the buildings around the site were not sufficiently close, although the distances are shorter than those associated with the Highlands Farm site. Therefore, as the site can readily be regarded as lying within Lower Shiplake it is a suitable location, unlike the major development envisaged on the site at Highlands Farm which conflicts with national and strategic local policy.

The Neighbourhood Plan has discounted Crossways as it does not regard Lower Shiplake as a location for growth. This is notwithstanding that it is classified as a smaller village in the South Oxfordshire Local Plan – a location within the hierarchy where development is acceptable.

Furthermore, the land at Crossways lies outside of the AONB, unlike Highlands Farm. There is clear guidance in the Local Plan and the NPPF that development should not be contemplated in the AONB especially where it would harm the landscape quality of the area, for which there is no evidence to prove that Highlands Farm would be acceptable.

Although the baseline assessment indicates that Shiplake does not have a housing target to be addressed, it is noted that the policies of the Local Plan concerning Henley relate to the Neighbourhood Plan area, and not specific settlements. Consequently, development at any settlement within the hierarchy as listed in the Local Plan (where they extend into the Joint Neighbourhood Plan area) would be appropriate.

This is emphasised by the clear references to the Neighbourhood Plans in policy HEN1 and the clear evidence that indicates that homes across the Plan area contribute towards the requirements. This is illustrated by the inclusion of sites within the completions and commitments figures as contributing towards the minimum of 1,285 dwellings i.e. the sites at Highlands Farm (191 dwellings) in the existing Neighbourhood Plan together with the permission at Thames Farm (to the north of Crossways) (95 dwellings) and the Wyevale Garden Centre (40 dwellings)³.

Since the Neighbourhood Plan includes completions and commitments at the smaller village of Lower Shiplake (within Harpsden Parish and consequently in the Plan area) to demonstrate it has achieved the requirements for a minimum of 1,235 dwellings as obligated by policy HEN1⁴, it is not explained why further growth at Lower Shiplake (again where it lies within the joint plan area such as at Crossways) is not appropriate, when it forms part of the existing accepted supply.

³ Sites listed as contributing towards the Plan area's affordable housing need on page 68 of the Baseline Report

⁴at least 135 dwellings on the sites at Thames Farm (95 dwellings) and Wyevale Garden Centre (40 dwellings)

Whilst the Neighbourhood Plan baseline report has discounted the Crossways site as not being within the built-up area of Lower Shiplake due to the distances from existing and committed buildings together with the differences in set back of buildings from Reading Road⁵, these distances are significantly less than that of the existing Highlands Farm allocation as detailed above (at least 180m). Therefore, this is an illustration that the Crossways site has been discounted whereas sites that entail significantly greater distances have been included.

Furthermore, the Crossways site was discounted whilst it was enclosed by existing and committed development on at least three sides, whereas for the field north of Highlands Farm proposal, this has development adjoining on up to 2 sides. As both entail development on greenfield sites, as Crossways is more enclosed by development on at least 3 sides, it should be preferred to a site which is only enclosed on two sides. The location of the Crossways site outside of the AONB is a further factor which indicates that it should be preferred to locations within, especially when they are equally able to contribute an appropriate proportion towards delivery of affordable housing.

Therefore, site 853a (land north of Highlands Farm) would not be considered to lie within the built-up area if adopting the methodology for site selection applied to the land north of Crossways site in the Baseline Report (NEW1). It should be discounted as an allocation.

The failure to provide a Visual Impact Assessment demonstrating that the site can be developed without harming the visual qualities of the AONB is a further indication that it should be removed, with alternative sites included, especially taking account the potential of land outside of the AONB which has not been fully assessed by the Neighbourhood Plan group.

The field north of Highlands Farm must therefore be reconsidered as its inclusion is inconsistent with the NPPF and the strategic policies of the Local Plan and consequently would fail the basic conditions test for the emerging Neighbourhood Plan

Land north of Crossways (Site NEW1)

I now discuss the site's respective benefits and the reasons why the Plan should be amended to include the site as an allocation for at least 11 dwelling, and how the site is suitable having regard to the commentary on its appraisal in the Site Assessment process. This is detailed below with commentary on the initial analysis.

⁵ By reference to the District Council's assessment of the planning application for 20 dwellings on the site

Appraisal in Site Assessment	WBP commentary on assessment
<p>The site is located adjacent to the settlement of Shiplake which is not a location for growth as set out in the Local Plan Strategy (STRAT1) and the Neighbourhood Plan.</p>	<p>Lower Shiplake is a smaller village as defined in the Local Plan. It is consequently an appropriate location for growth, especially as other sites adjoining the settlement are relied upon to achieve the housing requirements of policy HEN1 (as explained above).</p>
<p>As there are preferable sites available that are better related to Henley that can deliver the quantum of development required, it is not considered to be suitable for allocation in the Neighbourhood Plan.</p>	<p>As indicated, the contended preferable sites include land a greenfield site within the AONB. The NPPF and Local Plan (together with the conclusion of the previous Neighbourhood Plan examiner) indicate that such areas should not be preferred. The Neighbourhood Plan does not explain why sites have to be near Henley when they rely upon development elsewhere (including adjoining the smaller village of Lower Shiplake) in order to achieve the housing targets.</p>
<p>A planning application on this site for housing was refused planning permission (P20/S2103/FUL) by SODC, the SODC planning officer stated: <i>“SODLP Policy H16 defines infill development as “the filling of a small gap in an otherwise continuous built-up frontage or on other sites within settlements where the site is closely surrounded by buildings...” The site is currently open to the north. Even if Thames Farm is built out, it could not be said that the site is a small gap in a continuous built-up frontage. The Thames Farm development itself would be set back from the road by between 55 and 65m. The dwelling to the south (Corner House) fronts onto Woodlands Road, with around 85m of its garden along the A4155. The site is not closely surrounded by buildings as the large gardens to the south and paddocks to the west of the site mean there is an open aspect along these boundaries”</i>. It is considered that these reasons would still apply when considering the site for 11 homes.</p>	<p>The Neighbourhood Plan has included an allocation on the field north of Highlands Farm, although this is a greenfield site which adjoins existing and committed development on up to two sides. This contrasts with the Crossways site which is enclosed on at least three sides. The analysis earlier in the statement indicates that the distances between existing and committed development around the field north of Highlands exceeds the distances referred to in the Planning officers’ assessment on the earlier application. It is therefore considered that the discounting of the Crossways site is inconsistent with that applied elsewhere, especially recognising the higher landscape quality of the Highlands Farm site due to its location within the AONB. The annex to this letter provides a comparison with Chinnor where the District Council accepted that the site was sufficiently enclosed by development (existing and committed) on three sides to be regarded as an acceptable location for development. The baseline report has not explained why this approach does not apply at Lower Shiplake when the distances are shorter and there are more buildings enclosing the site.</p>

Appraisal in Site Assessment	WBP commentary on assessment
<p>It is considered that the site is situated beyond the edge of the currently built-up area, in a transitional location that is more rural in character. As such, it is more akin to the countryside than a built-up area, such as a settlement.</p>	<p>As indicated, the site is within a defined settlement, taking account of its enclosure on at least three sides by existing development.</p>
<p>The site would not fill a small gap in an otherwise continuous built-up frontage, and as the site is not located within a settlement, the proposal would conflict with the relevant provisions of the Local Plan (including Policy H16) and the Neighbourhood Plan objectives.</p>	<p>Criterion 2 of policy H16 indicates that infill comprises two different forms of development. These are:</p> <ul style="list-style-type: none"> A) filling of a small gap in an otherwise continuous built-up frontage; or B) Sites within settlements where the site is closely surround by buildings. <p>For the reasons explained, the site lies within a settlement as it is closely surrounded by buildings (see the annex which further demonstrates this having regard to the approach of the District Council elsewhere). Since the site accords with the second definition of infill, it is therefore acceptable, especially as the scale of development (at 11 dwellings) is appropriate when compared to other schemes permitted in Lower Shiplake. This includes those at Thames Farm and the former Wyevale Garden Centre (within the Joint Neighbourhood Plan area) together with those within Shiplake Parish (such as on land east of Reading Road).</p>
<p>Furthermore, The Local Plan strategy and Neighbourhood Plan seek to deliver sustainable development by directing growth to the main town of Henley-on-Thames (a requirement of 115 dwellings), it does not direct growth to Shiplake. Shiplake does not have a housing requirement through the Local Plan.</p>	<p>As indicated, the Local Plan indicates that the housing requirement is to be addressed in the Neighbourhood Plan area. As the Neighbourhood Plan already relies upon the contribution of market and affordable homes in Lower Shiplake (albeit within Harpsden Parish) to achieve the housing targets, there is no justification for discounting suitable sites in this location, such as Crossways.</p>
<p>It is therefore considered that the site would not be within the built-up area as stated by AECOM and would not accord with the overall strategy for the Neighbourhood Plan and Local Plan and not</p>	<p>This is disputed for the reasons detailed. As the site accords with the definition of infill (as explained by the comparison with schemes accepted by the District Council in Chinnor) which is acceptable within smaller villages like Lower Shiplake, it should be included as an</p>

This layout retains the trees along the Reading Road (eastern boundary of site) and delivers 11 dwellings, including 4 affordable units, making an important contribution towards these needs. The baseline report which accompanies the pre-submission Neighbourhood Plan calculates that there is an annual need for at least 53 affordable homes annually (page 66).

Whilst the Baseline report suggests that 145 affordable units will be forthcoming on sites with permission (page 68), the 26 affordable homes on land east of Reading Road, Shiplake is outside of the Neighbourhood Plan area (as it lies in Shiplake Parish). It therefore does not contribute towards the assessed need which was derived from the population of Henley and Harpsden parishes. Deducting this means that 119 affordable homes are expected, albeit that as these will be built over several years there remains an outstanding need for additional units to address the annual need of at least 53 properties. The allocation of Crossways for at least 11 dwellings (including 4 affordable) thereby reflecting the pending application can therefore contribute towards addressing this need.

The site north of Crossways is sustainably located and can readily be included as a housing allocation, thereby addressing the shortfall which will arise through the omission of the allocations in locations that are inconsistent with the NPPF i.e. entail major development in the AONB such as that envisaged for Highlands Farm (Site M).

Assessment of the Neighbourhood Plan against the Basic Conditions

The Neighbourhood Plan must meet the "Basic Conditions". These are set out in Law [paragraph 8[2] of Schedule 4B of the Town and Country Planning Act 1990]. In order to meet the Basic Conditions, the Neighbourhood Plan must:

- Have regard to national policies advice contained in guidance issued by the Secretary of State;
- Contribution to the achievement of the sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area; and
- Be compatible with EU obligations.

As drafted it is our position that certain of the sites proposed for allocation within the Neighbourhood Plan are not consistent with national or local planning policy or contribute towards sustainable development. On this basis I consider an examiner would deem that the Neighbourhood Plan does not meet the Basic Conditions and should not proceed to referendum.

Proposed Change/Summary

The first section of this letter confirms that the Qualifying Body can make amendments to the Neighbourhood Plan in response to consultation and then submit the amended plan to the District Council without any further consultation or undesirable further

delay. This includes removal of the unjustified housing allocations which are inconsistent with the approach in the NPPF and the Local Plan. The latter sections of the letter refer to the benefits of the land north of Crossways as a site allocation together with how the appraisal is inconsistent with that applied elsewhere.

For the reasons set out above, I consider that allocation of my client's site would be consistent with the basic conditions and should be **inserted into the NP as an allocation for at least 11 residential dwellings.**

I am happy to enter into further dialogue with the Qualifying Body regarding the site as deemed necessary.

I look forward to hearing from you in due course.

Yours faithfully,

A handwritten signature in black ink that reads "Douglas Bond". The signature is written in a cursive style with a large initial 'D' and 'B'.

Douglas Bond BA (Hons), MRTPI

Enc.

CC: Westbourne Homes and Debrecq (Crossways) Ltd

Annex – South Oxfordshire assessment of infill within Chinnor taking account existing and committed development.

The consideration of whether a site is an infill proposal entails a two stage process reflecting that outlined in the third criterion in policy H16. As there is no size threshold on the scale of an infill development against which proposals must be assessed, Therefore, given the characteristics of the area along and around the application site the scheme complies with first part of H16(3). This is explained further below through the comparisons of the site with the approach adopted by the Inspector determining an appeal in Chinnor.

How the approach advanced through policy H16 is to be applied has been confirmed in other decisions in the authority, such as the scheme approved on appeal in Chinnor (south of Greenwood Avenue) – (P16/S3284/O). This appeal was allowed having regard to the approach to considering the acceptability of an infill proposal now envisaged through policy H16, which reflects that in paragraph 13.10 of the former Core Strategy⁶.

Copies of the location plan and the illustrative layout for the land south of Greenwood Avenue are provided below.



South of Greenwood Avenue, Chinnor site in application P16/S3284/O
Location plan



Illustrative site layout

The Inspector in the appeal for residential development on land south of Greenwood Avenue, Chinnor (Appeal ref APP/Q3115/W/17/3187058) allowed in 24th December 2018 concluded the appeal site was closely surrounded by buildings (including through committed developments adjacent to the site). This is within paragraphs 23 to 27 of the decision (extracts below).

23. However, it is argued that whilst the Persimmon site is not a rural exception site, not allocated and not a redevelopment site, it is an infill site

⁶ Justification of Core Strategy Policy CSR1 – Housing in villages

within the built up area of Chinnor. Paragraph 13.10 of the supporting text states “Infill development is defined 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”. CNP Policy CH H1 also contemplates infill development within the existing built-up form of Chinnor village, albeit of a smaller scale.¹⁰

24. Size is not a factor as the table within CSR1 notes in relation to Smaller Villages and Other Villages sizes up to 0.2 hectare and 0.1 hectare respectively whilst for the Larger Villages which includes Chinnor the sites are stated to have no limit on size.

25. There is no defined settlement boundary so it is a matter of judgement whether the site is within the settlement. The Chinnor community centre and associated playing fields cover a large site but are clearly within the settlement. Similarly, the appeal site would have existing development on all sides

26. Turning to “closely surrounded by buildings”, it is not necessary to have 4 or even 3 sides occupied by development nor are adjacent buildings required to be hard up against the boundary. In this case the site is nearly 4 hectares of agricultural land. However, it is surrounded on all 4 sides by existing and approved development being built out. Back gardens adjoin the site and will provide residential curtilage and some containment. An electricity sub-station is close to the south eastern boundary which is otherwise bounded by a railway line whilst the south western part of the site completely adjoins existing identified local green space and a proposed open space on the adjoining Bellway site.

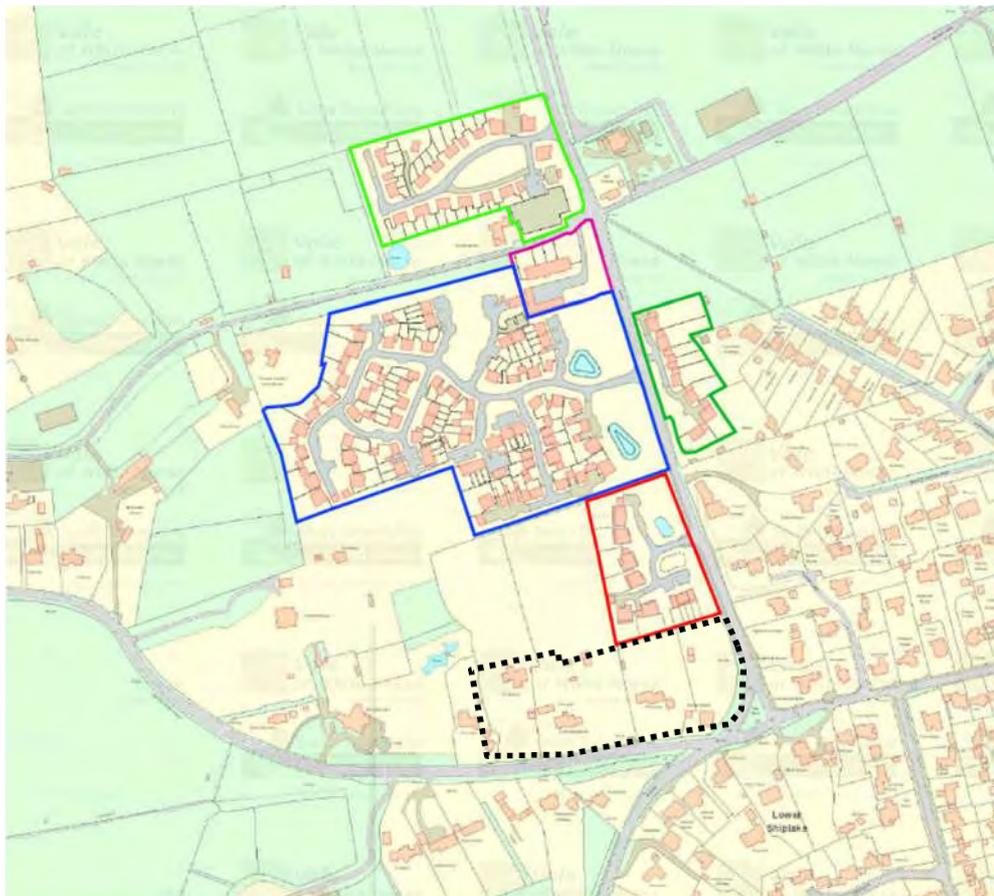
27. Analysis in the Council’s LCA says of the site before the latest development “contained on 3 sides”, “heavily influenced by adjacent housing”, “well contained by the existing built form at Chinnor” and “would not extend the settlement footprint into the wider landscape”. The proposal would therefore be perceived as infill development in terms of the CS Policy CSR1 and, albeit of a smaller scale, CNP Policy CH H1 and would accord with the development plan housing strategy. (My underlining)

As there are no site size thresholds in policy H16, it is consequently necessary to have regard to the clear approach to considering sites within smaller villages like Lower Shiplake. The policy for smaller villages reflects that assessed by the Inspector in the Greenwood Avenue above i.e. that infill relates to other sites within settlements where the site is closely surrounded by buildings (paragraph 23 of decision). This supports the value of the Greenwood Avenue appeal decision approach in assessing consistency with policy H16.

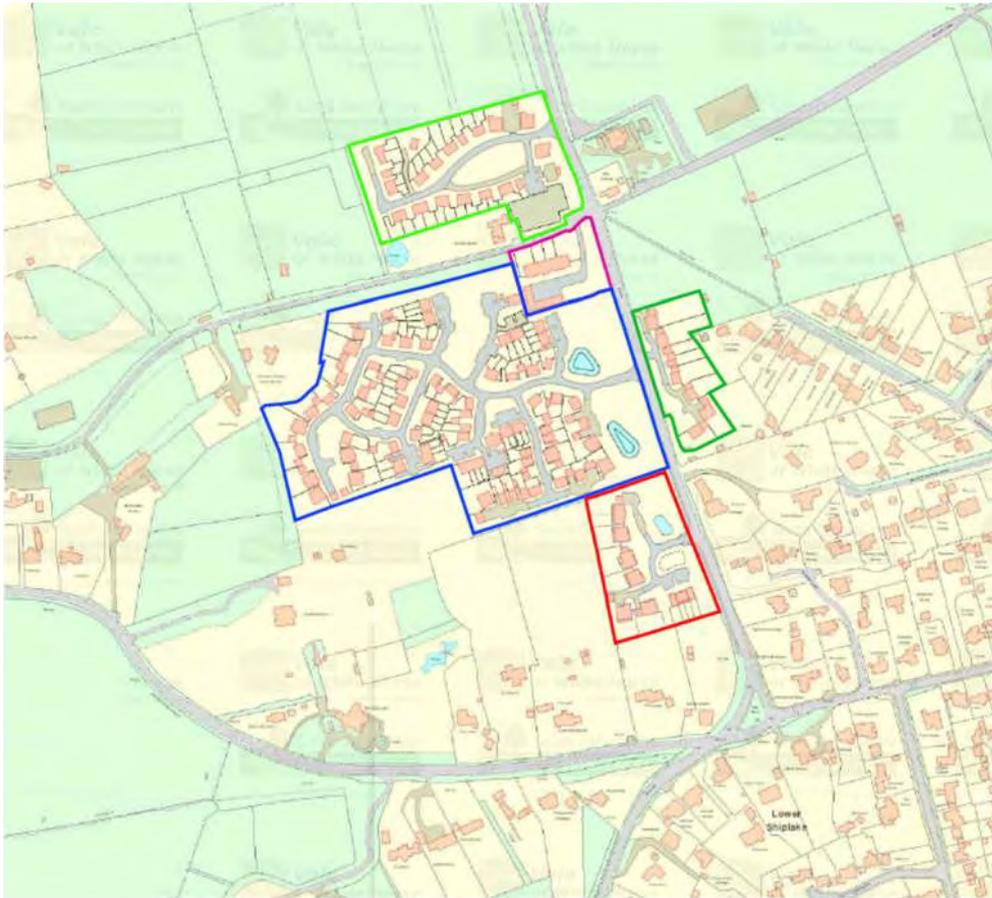
Lower Shiplake does not have a defined settlement boundary and therefore as acknowledged in the Chinnor appeal decision, it is therefore necessary to determine whether the Crossways site lies within its boundaries as a matter of planning

judgement. In considering this (applying the clear approach of the Greenwood Avenue appeal Inspector), where a site is enclosed on at least 3 sides by existing or committed development it should be regarded as being within the defined settlement.

As illustrated on the Context Plan submitted with the latest application (with an extract below), it is clear that the Crossways site is enclosed by dwellings and their associated rear gardens on at least 3 sides. The context plan illustrates existing and committed residential development extends west of the application. This is through the Taylor Wimpey development underway to the north (on Thames Farm (the area enclosed with blue line)) and the dwellings located south of the site off Woodlands Road (area within the dotted line). The core of Lower Shiplake lies to the east of the application site.



The buildings on the adjoining sites are all within 25m of the site boundary and consequently the scheme and site would accord with the definition of a infill as it is surrounded by existing and committed development, following the approach in Chinnor.



As indicated in the comparison with the Greenwood Avenue, Chinnor appeal, the context of the Crossways site is clearly one that lies within a settlement where it is closely surrounded by buildings. Consequently, taking account the approach of the Greenwood Avenue, Chinnor Inspector, it is clear that the application site can be regarded as a site within a settlement where it is closely surrounded by buildings.

Furthermore, applying the approach of the Greenwood Avenue Inspector, it is clear from the extract of the Context Plan submitted with the application that development of the Crossways site would also not involve the extension of the settlement of Lower Shiplake into the countryside. This is due to the enclosure provided by existing and committed development to the north and south as illustrated on the Context Plan (areas bounded by blue line and dotted black lines respectively). It is therefore clear that the site should now be regarded as being within the defined settlement.

The District Council has accepted that the dwellings along Woodlands Road lie within the settlement of Lower Shiplake through its earlier decisions. This includes the application for a replacement double garage at Abbotsbury House, Woodlands Road (P16/S3044/HH). In paragraph 1.1 of the officers' report, it states that the application site is "situated on a large plot within the small residential settlement of Lower Shiplake". This consequently confirms that the dwellings along the section of Woodlands Road (including that dotted above) lie within Lower Shiplake.

The need to consider committed development in determining whether a site could be regarded as a gap within a built-up frontage was acknowledged by the Inspector in the

appeal decision on land adjacent to The Tower House, Reading Road, Lower Shiplake (P18/S4323/FUL) (the area edged in purple on image below).



In paragraph 18 of the decision, the Inspector concluded:

A recent appeal decision¹ on land which shares a boundary with and is directly to the south of the appeal site, granted planning permission for an ‘extra care’ development for up to 65 units comprising of apartments and cottages. Although only granted in outline, this development, once completed, would render the subject appeal site a gap between a built-up frontage and also surrounded on three sides by development, with the site frontage remaining open to the main A4155. Furthermore, the appeal site would no longer form part of the visual separation between the settlements and would more likely be perceived as an extension to the built form of Lower Shiplake. However, there would remain a technical conflict with CS Policy CSR1 regarding the size of the site.

For the reasons previously explained, the Crossways site should likewise be regarded as infill site since it is closely surrounded by buildings.

Policy H16 (third criterion) also requires evaluation of the scale of the scheme when compared to its location. With respect of this, the development of 11 dwellings on the land at Crossways (as advocated through these representations and consistent with the pending application) would be consistent with the scale of the existing community of Lower Shiplake, taking account of the committed development in the area.

JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

Joint Henley and Harpsden Neighbourhood Plan Examination,
A Report to South Oxfordshire District Council

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

Nigel McGurk

Erimax Land, Planning and Communities

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November 2015

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1. Introduction

The Neighbourhood Plan

This Report provides the findings of the examination into the Joint Henley and Harpsden Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”

(Paragraph 183, National Planning Policy Framework)

Henley Town council is the *qualifying body* responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014). However, the Neighbourhood Area includes land within the adjoining Parish of Harpsden and I note, to produce the Neighbourhood Plan, resident-based working groups reported to a Neighbourhood Plan Governance Committee, which comprised Henley and Harpsden town and parish councillors.

This Examiner’s Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by South Oxfordshire District Council. The Neighbourhood Plan would then be used to determine planning applications and guide planning decisions in the Joint Henley and Harpsden Neighbourhood Area.

Role of the Independent Examiner

I was appointed by South Oxfordshire District Council, with the consent of the qualifying body, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience.

I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;
- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Joint Henley and Harpsden Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The Neighbourhood Plan is unclear in this regard. The title page of the Neighbourhood Plan simply refers to the date of its publication (June 2015) and there is no reference to the plan period.

Rather than set out the full plan period with clarity, Paragraph 2.1 on page 6 refers to the Neighbourhood Plan providing a vision for the area “...up to 2027.” There is no reference to a start date.

Unfortunately, the confusion is compounded later in the Neighbourhood Plan. Paragraph 7.4 on page 33 states that the South Oxfordshire Core Strategy 2012 (Core Strategy) identifies a housing land requirement for the period “...between 2011 and 2026.” However, the Core Strategy covers the period 2006 to 2027 and takes into account housing completions between 2006--2012.

Taking the above into account and to provide clarity/avoid confusion, I recommend:

- Title page, replace “June 2015” with “**2012--2027**”
- Page 6 Paragraph 2.1 line 7, change to “***The JHHNP sets out the community vision for the future of the area during the plan period 2012--2027.***”
- Page 33 Paragraph 7.4 line 3, change to “***...new homes during the period up to 2027 at Henley, being...***”
- Page 33 Paragraph 7.5 line 7, change to “***...within the period up to 2027.***”

Taking the above into account, I confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to South Oxfordshire District Council that I was satisfied that the Joint Henley and Harpsden Neighbourhood Plan could be examined without the need for a Public Hearing.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*¹ following the Localism Act 2011. In order to meet the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the basic conditions above.

On Page 6, the Neighbourhood Plan states that there is a “*need for Neighbourhood Plans to be consistent with both the National Planning Policy Framework and any relevant Development Plan policies.*” This is not the case. The basic conditions are referred to above.

Also on Page 6, the Neighbourhood Plan states that it is a requirement of the Localism Act for neighbourhood planning policies to “*accord with higher level planning policy.*” Again, this is not the case.

Whilst it is not uncommon for neighbourhood plans to seek to paraphrase the basic conditions, the wording of these basic conditions is the result of careful consideration. Paraphrasing them almost inevitably, as in this case, results in their misapplication. I recommend:

- **Page 6 Paragraph 2.1, delete last sentence**
- **Page 6 Paragraph 2.5, replace the second sentence with “*As well as have regard to national policies and advice, there is a need for the Neighbourhood Plan to be in general conformity with the strategic policies of the development plan for the area. For this reason...*”**

The relevant development plan for the area is the South Oxfordshire Core Strategy, which was adopted in 2012.

European Convention on Human Rights (ECHR) Obligations

¹ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

An objection to the Neighbourhood Plan states that “*under European legislation we in Henley have the Human Right to breathe clean air.*” However, there is no substantive evidence to lead me to the conclusion that the Neighbourhood Plan is in conflict with the ECHR in this regard.

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

European Union (EU) Obligations

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal². However, in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment.

The Basic Conditions Statement confirms that South Oxfordshire District Council determined that a Strategic Environmental Assessment was required due to the Neighbourhood Plan including housing allocations within the Chilterns Area of Outstanding Natural Beauty (AONB).

Subsequently, a Sustainability Appraisal was produced. The Sustainability Appraisal fully incorporated the requirements of the European Strategic Environmental Assessment Directive. Furthermore, it is clear from consideration of the evidence submitted that Sustainability Appraisal was integral to the plan-making process and was consulted upon in an appropriate manner.

The Environment Agency, English Heritage (now, with regards to planning matters, Historic England) and Natural England were consulted and their comments taken into account. None of the statutory consultees have raised any concerns with the Sustainability Appraisal or its conclusions.

A Habitats Regulations Assessment (HRA) is required if the implementation of the Neighbourhood Plan may lead to likely negative significant effects on protected European sites. The Basic Conditions Statement confirms that, as there are no European sites that would be affected, a HRA was not required.

With regards European obligations, I am mindful that national guidance establishes that the ultimate responsibility of determining whether or not a draft neighbourhood plan meets EU obligations lies with the local authority,

“the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.” (Planning Practice Guidance 11--031)

² Paragraph 026, Planning Practice Guidance 2014.

South Oxfordshire District Council has confirmed that it has “*worked closely*” with the Neighbourhood Plan group and that most issues have been resolved “*in an appropriate and satisfactory way.*” South Oxfordshire District Council has not raised any concerns regarding the Neighbourhood Plan’s compatibility with EU obligations.

Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations.

I note that an objector to the Neighbourhood Plan considers that “*the SEA/SA is fundamentally flawed.*” It is the objector’s contention that the Sustainability Appraisal “*overlooks any benefits in relation to meeting housing needs as identified by the Oxfordshire SHMA.*” However, there is no specific legislative requirement for this. Notwithstanding this, I note that it is neither possible, nor relevant, for a Sustainability Appraisal to consider every possible future scenario.

In the above regard, I am also mindful that the Sustainability Appraisal considers scenarios that relate directly to the housing requirement for Henley, as set out in the Core Strategy. I also note that, whilst comments have been received which suggest that “*Henley is in breach of*” EU Air Quality Directives, no substantive evidence has been provided to demonstrate that the Neighbourhood Plan is not compatible with EU obligations.

3. Background Documents and Joint Henley and Harpsden Neighbourhood Area

Background Documents

In undertaking this examination, I have considered various information in addition to the Joint Henley and Harpsden Neighbourhood Plan. This has included:

- National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- South Oxfordshire Core Strategy (2012) (Core Strategy)
- Basic Conditions Statement
- Consultation Statement
- Sustainability Appraisal
- Henley Transport Study
- Viewing Corridors

Also:

- Representations received during the publicity period

In addition, I spent an unaccompanied day visiting the Joint Henley and Harpsden Neighbourhood Area.

Joint Henley and Harpsden Neighbourhood Area

A plan showing the boundary of the Joint Henley and Harpsden Neighbourhood Area is provided on page 7 of the Neighbourhood Plan.

I note that one of the reasons for the inclusion of both Henley and Harpsden Parishes in a single Neighbourhood Area was the location of potential housing sites, identified by South Oxfordshire District Council, on the edge of Henley, but within Harpsden Parish. This appears to me to be a logical and appropriate reason for the establishment of an extended Neighbourhood Area, encompassing both Parishes.

Further to an application made by Henley Town Council, South Oxfordshire District Council approved the designation of Henley and Harpsden as a Neighbourhood Area on 10 June 2013.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

Joint Henley and Harpsden Neighbourhood Plan Consultation

In line with legislative requirements, a Consultation Statement was submitted to South Oxfordshire District Council. Further to consideration, I can confirm that this sets out who was consulted and how, together with the outcome of the consultation. In this regard, the Consultation Statement meets the requirements of the neighbourhood planning *regulations*³.

There is evidence to demonstrate that the views of the wider community were actively sought and taken into account. It is also clear that the plan-makers undertook significant and comprehensive public consultation, beyond that required by legislation.

At the start of the process, a Baseline Report was produced, to establish the social, environmental and economic characteristics of the area. Initial public consultation followed the delivery of a leaflet to every household in September 2013 and at the same time, residents were asked to volunteer to join working groups. Further consultation on initial options was carried out over the Christmas period in 2013 and further to a series of working group sessions during the first part of 2014, a draft plan was consulted on between May and July that year.

Once comments on the first draft had been taken into account, further working group sessions, along with a public focus group, modified the initial document and produced a second draft plan, which was consulted upon during February and March 2015.

The whole of the above was supported by a significant series of well-advertised events. For example, the initial public consultation was supported by five days of exhibitions and open days in three separate venues; and around 450 people

³Neighbourhood Planning (General) Regulations 2012.

attended events during the Christmas 2013 consultation, with nearly 500 completed questionnaires received.

Separate events were held with pupils at Gillots School and Henley College. Over 500 Henley College students completed a questionnaire. A business breakfast workshop was held and reported, with assistance from South Oxfordshire's economic development team. Also, site promoters and landowners were invited to present to working groups and participate in Q and A sessions, with nine promoters taking part over two days in November 2013.

Notably, more than 60 local residents volunteered to join the working groups, which considered and reported the full range of issues covered by the Neighbourhood Plan; and which ultimately determined the Neighbourhood Plan's content. Whilst an objection has criticised the working groups as holding meetings in "*closed session*" and keeping the identity of individuals "*secret*," there is no substantive evidence before me to demonstrate that the working groups carried out their roles inappropriately. On the contrary, I consider it a tribute to the local community that as many as 60 local residents were prepared to dedicate their time and effort to the purpose of producing the Neighbourhood Plan.

The two draft plan consultations were supported by significant activities, including exhibitions, events, drop-in sessions and the distribution of leaflets and questionnaires.

It is clear, from consideration of the Consultation Statement, that plan-makers went well beyond legislative requirements, to actively seek comments on, and involvement in, the neighbourhood planning process.

Consultation was widely communicated and well-publicised in a variety of ways, including via a comprehensive Neighbourhood Plan website, from which relevant documents and information could be accessed; through the extensive use of questionnaires, including Survey Monkey; via email and social media; through the publication of minutes; via the delivery of leaflets; through notices and posters; and through coverage in the Henley Herald and Henley Standard.

Taking all of the above into account, the Consultation Statement presents an audit trail to demonstrate that consultation was wide-ranging, comprehensive and transparent. Comments were pro-actively sought and comments received were duly considered. There is plentiful evidence to demonstrate that the Neighbourhood Plan reflects the views of local people.

Consultation was carried out in an open manner, and people and organisations were not just provided with a fair chance to have their say, but were actively encouraged to engage in shaping the Neighbourhood Plan.

I am satisfied that the consultation process was comprehensive and robust.

5. The Neighbourhood Plan – Introductory Section

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

The policies of the Neighbourhood Plan are considered against the basic conditions in Chapter 6 of this Examiner’s Report. I have also considered the Introductory Section of the Neighbourhood Plan and make recommendations below which are aimed at making it a clear and user-friendly document.

The Neighbourhood Plan is well presented. The use of plans and diagrams is supplemented with many interesting and informative photographs throughout the document. Text is clearly set out and Policies are distinctive from supporting information. All of this combines to result in an attractive and easy-to-read Neighbourhood Plan.

The Glossary and Contents are concise. However, the summary on Pages 4 and 5 is unusual, in that it appears to attempt to “squeeze” the whole of the Neighbourhood Plan into a couple of pages. This is unnecessary – all of the information summarised on Pages 4 and 5 is repeated, with more clarity, elsewhere in the document. By leaping straight into the content of the Policies, I find that Pages 4 and 5 present an unnecessarily confusing introduction to the Neighbourhood Plan.

I recommend:

- **Delete Pages 4 and 5**

Pages 6 and 7 can then more appropriately introduce the Neighbourhood Plan, its background and its intentions. I have recommended changes to Page 6 earlier in this Report.

Section 3 of the Neighbourhood Plan takes four pages to explain the consultation process. This is excessive, not least as a separate Consultation Statement, setting out the process in detail, was submitted alongside the Neighbourhood Plan, in line with legislative requirements. Essentially, the information provided on Pages 8 and 9 provides a comprehensive enough summary of the process. The further detail provided on Pages 10 and 11 is unnecessary and takes emphasis away from the most important part of the Neighbourhood Plan – its Policies. I recommend:

- **Delete Pages 10 and 11**

Section 4 provides interesting and helpful background information. The Vision and Objectives Section, together with the Strategy Section, provides an excellent introduction to the Policies that follow. It draws a firm link between the aims of the community and the Neighbourhood Plan’s Policies.

I note that Paragraph 4.4 includes an unusual reference suggesting that the County Council predicts that the population of the area will increase by just 1% by 2026. This appears as a somewhat awkward and given the content of the Neighbourhood Plan, including its housing allocations, irrelevant comment. I recommend:

- **Delete the second half of Paragraph 4.4 from “The County Council...” to the end of the Paragraph.**

6. The Neighbourhood Plan – Neighbourhood Plan Policies

The introduction to the Policy Section is a little confusing. For example, the National Planning Policy Framework will not deliver the Neighbourhood Plan’s vision. I recommend:

- **Delete Paragraph 7.1**

The Table on Page 32 sets out a link between the Policies of the Neighbourhood Plan and the Objectives set out earlier. Whilst the Table adds little to the content of the Neighbourhood Plan, there is no harm in it being retained, subject to ensuring that it does not lead readers to think that the Neighbourhood Plan’s Objectives carry similar weight to its Policies. I recommend:

- **Add new sentence at the end of Paragraph 7.2, “*For clarity, the Neighbourhood Plan Objectives should not be confused with the Neighbourhood Plan Policies. This Table is simply provided for information purposes --- to demonstrate how the Policies of the Neighbourhood will meet the Objectives set out in the preceding pages.*”**

Paragraph 7.3 introduces confusion rather than clarity. It is not a requirement for Neighbourhood Plan Policies to “conform” to Objectives. I recommend:

- **Delete Paragraph 7.3**

Housing

Policy H1: Allocate land for 450 new homes

I have made recommendations above with regards Paragraphs 7.4 and 7.5 of the Neighbourhood Plan.

Paragraph 7.7 provides a helpful summary of how the Neighbourhood Plan is in general conformity with the Core Strategy and how plan-makers have taken into account other relevant information, particularly that arising through the plan-making and consultation processes, to inform the Neighbourhood Plan's approach to housing allocation.

Policy H1 allocates land for 450 homes. Whilst this quantum of housing is in general conformity with Core Strategy Policies CSH1 and CSHEN1 (and reflects para 10.9 of that document, where the Inspector recommends the delivery of 450 homes in Henley, if possible), the wording of the Policy is inappropriate as it relies upon the content of other documents. I comment below with regards the deliverability of the housing allocations.

I also note that the Policy refers to the "Key Diagram." There is no Key Diagram in the Neighbourhood Plan, just an untitled plan on Pages 30 and 31. This plan is extremely "busy" and its key does not fully correspond to the content of the plan itself (for example, the AONB is not shown on the plan). In addition, whilst it is a useful reference document, it is of such a scale that it cannot appropriately define land allocations.

Taking the above into account, and subject to my further comments below, I recommend:

- **Change wording of Policy H1 to: "*Land for new housing is allocated at the sites listed below. Development within each of the sites is subject to the Site Allocation Policies set out in this Plan.*" (and retain the Table showing the sites, allocation and gross site areas)**

In the above way, Policy H1 is in general conformity with the Core Strategy. It supports sustainable growth and in this way, has regard to national policy; and contributes to the achievement of sustainable development. In addition to this, it does not set out a maximum housing number, or cap, and so does not necessarily prevent or preclude sustainable development from coming forward.

Further to the above, whilst the individual Site Allocation Policies are provided later in the Neighbourhood Plan, I find it appropriate to consider them within the Housing section of this Report as any significant changes to these Policies may impact on my recommendations in relation to Policy H1.

Policy SP1 relates to Site M, Highlands Farm, which is allocated for up to 140 new homes amongst other uses. In addition, **Policy SP12** is concerned with Site M1, a site adjacent to Site M and one that the Neighbourhood Plan seeks to reserve for development, to be released if Site C, the subject of **Policy SP11**, does not come forward by 2020.

I consider it helpful to consider **Policy SP11** first. Policy H1 allocates land at Site C (Gillotts School) for “*up to 50 dwellings.*”

The supporting text to Policy H1 refers to the delivery issues associated with Site C, largely relating to the replacement of playing fields. Whilst this is not a factor that will necessarily prevent development from coming forward – and I am mindful in this regard that the Headteacher and Chair of Governors of Gillotts School have provided evidence of how it is proposed to enhance the School’s playing facilities – it presents a risk to delivery.

From consideration of all of the evidence, I am aware that the allocation of land at Gillotts School is a matter of local contention and that ultimately, the plan-makers determined that the potential benefits of development – including enhanced alternative sports provision – would outweigh the possible harm arising.

In the above regard, I note that plan-making is rarely a straightforward process and that there are times when difficult and even contentious decisions need to be made. In this case, there is evidence to demonstrate that the decision to allocate land at Gillotts School has emerged through a process that included a balanced assessment and robust consultation. The allocation of Site C has regard to Paragraphs 72 and 73 of the Framework, which afford “*great weight to the need to...alter schools*” and recognise the “*important contribution to the health and well-being of communities*” that opportunities for sport and recreation present.

In seeking to take account of the delivery risks associated with Gillotts School, the Neighbourhood Plan seeks to allocate two reserve sites, Site M1 and Site A1 (the subject of Policy SP13), which together provide for a total of 50 dwellings.

However, whilst Policies SP12 and SP13 state that Policy H1 reserves Sites M1 and A1, this simply isn’t the case. Policy H1 does not mention Sites M1 and A1. It is the supporting text to Policy H1 that establishes that if Site C “*has not been brought forward by 1st January 2020*” then the two reserve sites will be released.

Notwithstanding the absence of any reference in Policy H1, this seems to me to be a very odd approach.

Essentially, in seeking to allocate Sites M1 and A1 as reserve sites, the Neighbourhood Plan recognises that they provide the potential for sustainable development. Having considered the information before me, it is apparent that both

reserve sites have merits whereby their residential allocation meets the basic conditions.

For example, part of Site M1 comprises previously developed land, the re-use of which is supported by national policy. The allocation of Site A1 would provide for a wide choice of high quality homes, in line with Paragraph 50 of the Neighbourhood Plan, in a location within reasonable proximity of services and facilities, and with the potential for the delivery of new and improved cycling and walking links, having regard to Chapter 4 of the Framework, which promotes sustainable transport.

The intention of the Neighbourhood Plan appears to be to prevent these sites from being released if Site C comes forward before 2020. However, what makes the approach particularly strange, is that, if Site C were to come forward for development on January 2nd 2020, then the two reserve sites would be released for development. Consequently, all three sites would be developed anyway and the Neighbourhood Plan would provide for the delivery of 500 homes during the plan period. Whilst I acknowledge that there is some evidence around which site is “better from a traffic and air quality management perspective” this becomes somewhat irrelevant, as, subject to the above, all three sites can come forward anyway.

The Ministerial Foreword to the Framework is entirely clear in stating that “*Development that is sustainable should go ahead, without delay.*” No substantive reason is provided to justify holding back the release of Sites A1 and M1, then releasing them for development if Site C has not come forward by January 1st 2020.

Further to the above, I am also mindful that both sites are adjacent to other allocations in the Neighbourhood Plan. It is a core planning principle to “*always seek to secure high quality design and a good standard of amenity*” (Para 17, Framework). Good design is indivisible from good planning and national policy requires development proposals to “*optimise the potential*” of sites (Para 58, Framework).

As set out, Policy H1 would prevent two of the most significant allocations in the Neighbourhood Plan (Sites M and A) from being planned and delivered alongside Sites M1 and A1, as it introduces uncertainty over the release of the latter two sites. This has major implications for the effective masterplanning of sustainable development.

In the case of Site A (the subject of **Policy SP8**), as noted later in this Report, the ability to plan it together with Site A1 would provide a greater opportunity to optimise its potential whilst meeting the requirement to preserve the Conservation Area and its setting. Unfortunately, the requirements of Policy H1 effectively require Site A to be planned as an entirely separate entity from Site A1. As a consequence of this, the Neighbourhood Plan fails to have regard to Paragraph 58 of the Framework.

To a large degree, Sites M and M1 form part of the same wider site. They are immediately adjacent to one another and both contain large areas of previously

developed land. Importantly, Site M1 is entirely reliant upon Site M for access. Both sites need to deal with similar archaeological and heritage constraints. The Neighbourhood Plan even states that *“The same issues relevant to Site M are applicable to Site M1.”* Planning the two sites together would clearly optimise their potential and thus have regard to national policy.

By way of contrast, as set out, the Neighbourhood Plan would actively prevent a developer’s ability to optimise the potential of both sites. It would potentially prevent the effective and sustainable re-use of previously developed land, contrary to national policy.

With regards to Site M, the Chilterns Conservation Board has expressed concern regarding potential impact on the AONB. The Framework affords great weight to conserving landscape and scenic beauty in AONBs. In this respect, I agree that it would be clearer for Policy SP1 to separate out matters relating to impact on the AONB to those relating to green infrastructure and biodiversity. However, having regard to Paragraph 59 of the Framework, which states that *“design policies should avoid unnecessary prescription or detail,”* I consider that the Policy would not meet the basic conditions if it was overly prescriptive. I take these factors into account in making the recommendations below.

I note that indicative land use plans are provided in Appendices. The Appendices do not form part of the Neighbourhood Plan. Consequently, these plans have little status. Furthermore, as indicative plans, they are subject to significant changes. Consequently, I find that the plans do not provide any degree of certainty for decision makers or prospective applicants and as such, add nothing to the content of the Neighbourhood Plan.

Taking all of the above into account, I recommend:

- **Delete Paragraph 7.8**
- **Delete Policy SP12 and associated text/plan**
- **Delete the land use plans in the Appendices (pages 80–82 inclusive) and Paragraphs 8.6, 8.17 and 8.22**
- **Policy SP1, extend Site M to include M1. Increase approximate size to 8.2ha; change a) to “around 170 homes”; and delete bullet point m) (which is incomplete anyway)**
- **Policy SP1, add bullet point b) from the deleted Policy SP12**
- **Policy SP1, delete reference to Core Strategy Policy CSQ4, it is unnecessary and confusing to reference this in a Neighbourhood Plan Policy**

- Policy SP1, end f) at “...boundary edges.” Introduce a new bullet point, below, stating “Ensures that the development has no greater impact on the AONB than the existing development on the site; and that development conserves and where possible, enhances the landscape and scenic beauty of the AONB.” Remove apostrophe in 8.2 (and 7.54) and refer to “AONB” in 8.23 (and 4.31).
- Delete Policy SP13 and associated text/plan
- Policy SP8, extend Site A to include Site A1. Change third line to “...for around 60 dwellings.”
- Policy SP8, delete bullet point e)
- Policy SP8, change 8.14, line 5, to “...of 60 dwellings across around 3.8ha, the density is around 16 dwellings per ha.”
- Policy SP8, change 8.15, line 1 to “The total of 60 dwellings is identified...”
- Policy SP8, change 8.16, line 2, to “...(around 60)...”
- Policy SP11, remove the reference to, and extract from, the Framework from the Policy, as well as the unnecessary reference to another Policy in the Neighbourhood Plan, from “The present...community as a whole.” It is not the role of Neighbourhood Plan Policies to repeat the content of other Policies from other documents and the Neighbourhood Plan should be read as a whole.
- Policy H1, Table, change Site A to “Around 60 dwellings...3.8ha”
- Policy H1, change Site M to “Around 170 dwellings as part...site...8.2ha”
- Policy H1, change Table Total to “Around 500 dwellings”

An objection to the Neighbourhood Plan contends that it does not provide for any contingency or flexibility. This is not the case. The Neighbourhood Plan does not promote less development than set out in the Core Strategy and consequently, it has regard to Paragraph 184 of the Framework. Furthermore, the Neighbourhood Plan provides for development over and above the requirements of Core Strategy Policy CSHEN1, which requires the allocation of land for 400 dwellings in Henley⁴.

⁴ I note that Policy CSHEN1’s supporting text also refers to the provision of land for an additional 50 dwellings. This takes into account the Core Strategy Inspector’s comment that a future plan should look to provide 450 dwellings if possible. The supporting text conditions this with “if it proves to be possible to identify suitable land free of constraints in the circumstances then pertaining.” Whilst I note that, in general, most development sites tend to be constrained to some degree or other, the reference provides some degree of balance to the suggestion that development in Henley is subject to a “cap.” Notwithstanding this, the neighbourhood planning

Consequently, it provides for sustainable growth, helps to boost the supply of housing and provides for the delivery of a wide choice of high quality homes. In this regard, the Neighbourhood Plan contributes to the achievement of sustainable development, has regard to the Framework and meets the basic conditions. I also note that there is no substantive evidence to demonstrate that the allocated sites are not capable of being delivered during the plan period.

A number of objections to the Neighbourhood Plan refer to alternative sites for residential allocations. However, the Neighbourhood Plan provides for sustainable development on sites that meet the basic conditions and which, together, provide for development over and above that set out in the Core Strategy. It provides for sustainable growth and there is no need for it to allocate further sites.

In acknowledging that the Neighbourhood Plan provides for development in excess of that set out in the Core Strategy, I note that Paragraph 183 of the Framework is explicit in recognising the “*direct power*” afforded to communities to “*develop a shared vision for their neighbourhood and to deliver the sustainable development they need.*” I also note that there is no substantive evidence before me to demonstrate that, either individually or together, the housing allocations would undermine the strategic policies of the Core Strategy.

In addition to the above, I am mindful that South Oxfordshire District Council has expressed some concerns “*about the capacity of the allocated sites to deliver the expected number of new homes proposed*” and that, to some degree, the recommendation above helps to address this. I also note that South Oxfordshire District Council suggests including a reference in Policy H1 to the Henley Transport Study. However, whilst informative, I note that this Study simply provides guidance.

The Table in Policy H1 uses the term “*up to*” ahead of each number of dwellings. I note above that South Oxfordshire District Council have some concerns about the number of dwellings assigned to each site. In addition, I find that the phrase “*up to*” limits the ability of each site to provide for flexibility, for example, to take account of changing market conditions over time, having regard to national policy.

Furthermore, evidence has been submitted to demonstrate that the limits imposed by the use of the phrase “*up to*” may prevent sustainable development from coming forward. For example, it is suggested that Site Z, considered later in this Report, could be capable of providing more than 13 dwellings within a sustainable development and there is no substantive evidence before me to the contrary.

Taking the above into account, I recommend:

- **Policy H1, Table, change “up to” to “around”**
- **Site allocation Policies, change all references to “up to” to “around”**

process in Henley has clearly identified sites in Henley with residential potential and has undergone robust consultation.

Subject to the above, Policy H1 and the subsequent site Policies contribute to the achievement of sustainable development.

The Foreword of the Framework recognises that sustainable development is about positive growth. Taking the above into account, Policy H1 has regard to national policy and contributes to the achievement of sustainable development. It meets the basic conditions.

I recommend changes to **Policy SP8** above. As a result of the recommendation, Site A will comprise around 3.8 ha and provide for around 60 dwellings.

Part of Site A lies within Henley Conservation Area. Part of the rest of the site is located within the setting of Henley Conservation Area.

National policy recognises that England's heritage assets as irreplaceable. Consequently, they are to be conserved in a manner appropriate to their significance. Chapter 12 of the Framework establishes the basis for the conservation of heritage assets and Core Strategy Policy CSEN3 states that heritage assets will be conserved and enhanced for their historic significance and important contribution to local character.

Nowhere does national or local strategic policy state that development cannot take place within, or within the setting of, Conservation Areas. However, as heritage assets are irreplaceable, any harm or loss resulting from development requires clear and convincing justification. Where there is substantial harm to the significance of a designated heritage asset, consent for development will be refused, unless it can be demonstrated that substantial public benefits outweigh that harm or loss. Even where less than substantial harm would arise, there is a need to weigh the public benefits of a proposal against the harm.

Thus, any application on land impacting on the Henley Conservation Area would need to overcome significant hurdles --- national and local planning policy afford a high degree of protection to heritage assets.

There is no substantive evidence before me to demonstrate that Site A could not possibly be developed without any such development being in direct conflict with the Framework and Policy CSEN3.

I recommend above that there should be an opportunity for Site A1 to be planned alongside Site A. Whilst adjacent to Site A, Site A1 does not relate to the Henley Conservation Area in the same way. Consequently, planning the two sites as one provides the opportunity to optimise potential, having regard to the Framework.

It has been suggested that Sites A and A1 are not needed. However, I am mindful of South Oxfordshire District Council's comments with regards site capacities and find

that, if both sites were removed from the Neighbourhood Plan, there is a risk that it would not meet the requirements of the Core Strategy and provide for flexibility and sustainable growth, having regard to the Framework.

In support of the allocations, a legal opinion was submitted on whether or not there is a need for the requirements of various parts of the Planning (Listed Buildings and Conservation Areas) Act 1990 to be applied. Whilst I have considered this opinion, it has little if any bearing on my findings above.

Generally, neighbourhood planning legislation is refreshingly simple. It tends not to be unnecessarily complicated, convoluted or unduly legalistic and so enables neighbourhood planners --- who more often than not, volunteer their time and resources --- to have as good an understanding of the necessary processes as anyone else. Whilst law and land use planning are necessarily intertwined, detailed legal opinions are not always necessary or helpful.

Further to all of the above, in considering Policy SP8, I am particularly mindful of Historic England's role and responsibility for looking after England's historic environment. With specific regard to Policy SP8, Historic England has no objection, but rather, it states "*We can confirm that the submission version of the plan has addressed our concern with regard the potential impact on the Henley Conservation Area.*"

The Government body responsible for the historic environment has raised no concerns that the allocation of Site A fails to meet the basic conditions.

Taking all of the above into account, no changes to Policy SP8 are recommended, other than those set out earlier.

Together, **Policies SP2, SP3, SP4, SP5, SP6, SP7, SP9 and SP10** relate to the rest of the Neighbourhood Area's allocated residential sites.

All of the sites subject to the Policies listed at the top of this page are brownfield. Consequently, their redevelopment can comprise the effective use of previously developed land, having regard to national policy.

Policy SP2 provides no definition of what "*an exceptional gateway development*" comprises and so there is a lack of clarity within the Policy for both decision makers and prospective applicants.

Furthermore, there is no need to explicitly reference other Policies, as the Neighbourhood Plan should be considered as a whole. This is a factor that applies to all of the Site Allocation Policies. Also, as worded, the Site Allocation Policies are grammatically incorrect, in that they mix up tenses.

Policy SP5 requires the Design Brief to demonstrate how Site J integrates with Site H. There is no requirement for Site H to integrate with Site J. Whilst, as worded, the delivery of Site J is subject to the opening of replacement community sports facilities, there is no substantive evidence to demonstrate that it could not possibly come forward in advance of Site H. In such a case, a requirement to integrate with something that has not yet occurred would prevent sustainable development. In addition to this, a requirement to integrate with Site H, where development is effectively free to “turn its back” on Site J, is unduly onerous.

Further to the above, it is a concern that, as worded, Policy SP5 prevents “permission” for development until replacement community sports facilities have opened. This is an inflexible approach, that may serve to prevent sustainable development from coming forward. I make a recommendation below that, ultimately achieves the purpose of securing sports facilities, but does so in a manner that takes development viability, amongst other important factors into account.

Sites U and X are located adjacent to one another, but comprise separate sites. No details are provided to demonstrate how Site U can be “integrated” with Site X, although I note that there is scope to ensure that the development of either site does not prejudice that of the other.

Taking all the above into account, I recommend:

- **For all of the Site Allocation Policies, remove the phrases “in addition to the principles set out within Policy H2” (or, where applicable, “in addition to the principles set out within Policy H2 and Core Strategy Policy CSQ4”) and “to conform with Policy T1”**
- **For all of the Site Allocation Policies, revise the grammar along the lines of “the Design brief should demonstrate how the proposed development...Maximises...Delivers...Contributes to...Integrates with...Mitigates...etc.” The developments have not yet occurred and a Design Brief is intended to provide guidance for the future.**
- **Policy SP2, delete “delivering an exceptional gateway development to the town”**
- **Policy SP5, f) replace “...site H (Mill Lane former Jet Garage) and..” with “the”**
- **Policy SP5, change d) to “Development should not start prior to...”**
- **Policy SP6, change a) to “does not prejudice the delivery of Site X”**
- **Policy SP9, change b) to “does not prejudice the delivery of Site U”**

Subject to the above, the Site Policies meet the basic conditions.

Policy H2: Design Brief

Good design is recognised by national policy as comprising

“a key aspect of sustainable development...indivisible from good planning”
(Para 56, The Framework)

and national policy requires good design to contribute positively to making places better for people (Chapter 7, The Framework).

By seeking the provision of Design Briefs for each allocated site, Policy H2 has regard to national policy. However, as worded, Policy H2 is reliant upon another Policy in another document, not within the control of the Neighbourhood Plan. Furthermore, there is no explanation or guide to how a Design Brief can be proportionate to the scale of a proposed development.

In addition to the above, Policy H2 requires potential applicants to seek to agree a Design Brief with both Henley Parish Council and South Oxfordshire District Council prior to being submitted as part of a planning application. Whilst pre-application discussion should be encouraged, I note that the approach set out in Policy H2 seeks to place a burden on another body, outside the control of the Neighbourhood Plan.

The Policy goes on to state that every allocated site *needs* to have a Design Brief that covers a wide range of factors, without providing any evidence to demonstrate that every one of these factors is relevant to the site the subject of the Design Brief. It is not clear, for example, why the development of ten dwellings at Site V needs to cover the location, type and management of open space and recreation facilities, and “connecting walking and cycling routes.” Without this clarity, Policy H2 may seek to impose requirements that are irrelevant to and/or place an undue burden on development proposals.

With regards the above, Paragraph 193 of the Framework is clear in its requirement for supporting information to be *“relevant, necessary and material to the application in question.”* In this respect, Policy H2 fails to have regard to national policy.

Furthermore, part vi) of Policy H2 effectively requires all development to enhance local character. Whilst a welcome aspiration, as set out, it amounts to an onerous requirement for all housing allocations to meet without any evidence to demonstrate that it has regard to any national policy, or is in general conformity with any local strategic policy.

I recommend:

- **Policy H2, delete second sentence**

- **Policy H2, change second paragraph to “Applicants should seek to discuss the content of the Design Brief with Henley Town Council and where appropriate, Harpsden Parish Council.”**
- **Change line 16 to “Where appropriate, the Design Brief should demonstrate consideration of:”**
- **Change vi) to “How the development responds to local character.”**

Subject to the above, Policy H2 meets the basic conditions. I note that the supporting text to Policy H2 simply sets out things that the Neighbourhood Plan would like to encourage and no changes are recommended.

Policy H3: Type and Size of New Housing

Generally, Policy H3 seeks to provide a wide choice of high quality homes, having regard to the Framework.

Bullet points b) and c) rely on other Policies and documents beyond the control of the Neighbourhood Plan, as do the first two paragraphs that follow the list of bullet points, as well as the final paragraph of the Policy.

I recommend:

- **Policy H3, delete b) and c)**
- **Policy H3, delete from “For sites less...Core Strategy” and delete final paragraph**

Policy H4: Provision of Facilities

Policy H4 relies upon two other Policies in the Neighbourhood Plan. I recommend deletion of Policy SCI1 below, as it does not meet the basic conditions. I recommend the deletion of the majority of Policy EN2 below, as much of the Policy fails to meet the basic conditions.

Further to the above, Policy H4 provides no detail about the level of contribution required; what the full range of facilities required are; why this full range of facilities is required; and why the full range of facilities are directly relevant to the development contributing towards them.

Policy H4 fails to provide a decision maker with a clear indication of how to react to a development proposal and thus fails to have regard to Paragraph 154 of the Framework.

Policy H4 does not meet the basic conditions. I recommend:

- **Delete Policy H4 and all related text**

Policy H5: Infill and self-build dwellings

It may be possible for a development to be sustainable, even where there is some degree of policy conflict. Development planning is often a balancing exercise and national policy is unambiguous in stating that sustainable development should go ahead without delay.

Taking the above into account, an approach that requires development to be sustainable and have no conflicts whatsoever with any planning policy fails to have regard to national policy and advice.

I recommend:

- **Policy H5, end Policy at “...sustainable development.” (and delete rest of Policy)**

National policy promotes the effective use of land and Paragraph 50 of the Framework sets out the need to plan for people wishing to build their own homes. Subject to the above, Policy H5 contributes to the achievement of sustainable development and meets the basic conditions.

Policy H6: Contingency

Policy H6 is not a land use planning policy. It is a statement setting out possible future actions by Henley Town Council and Harpsden Parish Council. I recommend:

- **Delete Policy H6 and create an “Action Point.” Move the text of the deleted Policy to the Action Point, but delete the last sentence of the first paragraph.**

Policy T1: Impact of development on the transport network

Parts 1 and 2 of Policy T1 are reliant upon other Policies or other bodies and are beyond the control of the Neighbourhood Plan. Parts 3 and 4 of Policy T1 state that something should happen, but provides no mechanism for it to do so. Part 6 of Policy T1 places an unduly onerous requirement upon all development, but is clearly not relevant to all development.

Notwithstanding the above, whilst confusingly worded, the remaining parts of Policy T1 seek to promote sustainable transport, having regard to Chapter 4 of the Framework.

As worded, Part 5 is somewhat vague, but can appropriately be linked to allocated development sites. It is inappropriate for the final part of the Policy to apply to all forms of development – for example, on what possible basis would a household extension be encouraged to improve public transport including rail ?

No indication is provided as to how the Neighbourhood Plan will “encourage” something to happen. Also, the Neighbourhood Plan provides no definition of what a “car club” comprises – for example, the Morris Minor Owners Club is a car club.

I recommend:

- **Policy T1, delete parts 1, 2, 3, 4 and 6**
- **Policy T1, change Part 5 to “*Allocated residential development sites will be required to provide a Travel Plan, setting out how opportunities...development.*”**
- **Policy T1, change the last part of the Policy to “*The provision of new or improved walking or cycling routes; improvements to public transport; and the incorporation of electric car charging points, will be supported.*” Add to the final sentence “*Until Community Infrastructure Levy (CIL) is in place, financial contributions from allocated residential sites will be sought for...Plan.*”**

Subject to the above, Policy T1 meets the basic conditions. The supporting text to Policy T1 provides interesting background information and no changes are recommended.

Policy T2: Cycling Routes

Chapter 4 of the Framework encourages sustainable modes of transport and Policy T2 has regard to this.

It is not clear how the Neighbourhood Plan will encourage something to take place, and no information is provided to set out how the Neighbourhood Plan will “*ensure that Henley is well connected, safe and accessible by bicycle.*” I recommend:

- **Policy T2, delete “and encourage...bicycle.”**

Subject to the above, Policy T2 meets the basic conditions.

Policy SCI1: Provision of social and community infrastructure

Policy SCI1 relies upon a document that doesn't exist and a Policy in another document, beyond the control of the Neighbourhood Plan. It requires all development to contribute to an undefined "full range of facilities required," regardless of whether such a contribution is necessary to make the development acceptable in planning terms, directly related to the development, or fairly and reasonably related in scale and kind to the development.

Consequently, Policy SCI1 is unduly onerous and fails to have regard to national policy. It does not meet the basic conditions. I recommend:

- **Delete Policy SCI1 and related text**

Policy SCI2: Comprehensive Renewal of Gillotts School

Policy SCI2 refers to an area defined on the Key Diagram. As noted above, there is no Key Diagram in the Neighbourhood Plan. Furthermore, the plan on pages 30 and 31 of the Neighbourhood Plan is at an inappropriate scale to be considered capable of "defining" a site with any relevant precision.

There is no indication in Policy SCI2 of how the Neighbourhood Plan will "ensure" the delivery of "a first class facility...in cutting edge learning," whatever that might be.

Much of Policy SCI2 comprises a reference to another Policy in the Neighbourhood Plan and the repetition of part of the Framework.

However, the Framework affords great weight to the need to expand or alter schools (Paragraph 72) and supports the replacement of sports facilities with equivalent or better facilities (Paragraph 74), and part of the Policy has regard to this. I recommend:

- **Policy SCI2, change wording to "The renewal of Gillotts School will be supported subject to it resulting in the provision of alternative enhanced sports facilities to those that currently exist."**

Subject to the above, Policy SCI2 meets the basic conditions.

Policy SCI3: Renewal and enhancement of community facilities

Policy SCI3 refers to community facilities identified on the Key Diagram. Notwithstanding the points above, the plan on pages 30 and 31 of the Neighbourhood Plan shows two yellow dots with orange circles around them in locations not too distant from the centre of Henley. These dots apparently correspond to “Community facilities with potential for renewal and enhancement” under the title “Keys.” No other detail is provided. This does not constitute the appropriate identification of community facilities.

The supporting text names community facilities. Rather than refer to something that is not properly identified, Policy SCI3 should more appropriately refer to specific facilities.

Chapter 8 of the Framework promotes healthy communities and Policy SCI3 generally has regard to this. I recommend:

- **Policy SCI3, change wording to “*The renewal and enhancement of the community facilities used by the following community groups, will be supported: Henley on Thames Social Club for the Over 60s; Henley on Thames Scouts; and Headway Thames Valley.*”**

Policy SCI4: Community Right to Build

Policy SCI4 supports proposals based on the Community Right to Build. The Policy has regard to national policy and advice and subject to the recommendations below, meets the basic conditions.

- **Policy SCI4, end Policy “...will be supported.” (and delete the Policy text that follows)**

Policy SCI5: Henley College

The Framework is positive with regards to development that will widen choice in education and Policy SCI5 has regard to this. The Policy seeks to support the redevelopment of Henley College’s sites in order to meet accommodation needs. However, as worded, it comprises a partial statement and not a land use planning policy.

Further to the above, the Policy does not define what “an educational facility of the highest standard” actually is. Consequently, it does not provide decision makers with a clear indication of how to react to a development proposal.

There is no detailed information setting out what form future redevelopment might take. Rather than include generalised comments, it is appropriate for the

Neighbourhood Plan to be specific. I note that Henley College has commented that the Neighbourhood Plan does not reflect the College's position.

I recommend:

- **Policy SCI5, re-word as *"The redevelopment of Henley College, to meet educational accommodation needs, will be supported."***
- **Replace Para 7.35 with "This Policy recognises Henley College as an important asset to the town." Delete all other text.**

Retail and town centre

Policy TCE1: Henley Town Centre

Policy TCE1 refers to a Key Diagram inset. The reference should more appropriately be to the Town Centre Plan on page 47. I note that the Town Centre Plan's reference to another plan in another document is confusing and unnecessary.

Generally, Policy TCE1 supports the vitality of the town centre, having regard to Chapter 2 of the Framework. It emphasises the importance of focusing development within Henley Town Centre, but does not prevent sustainable development from coming forward outside it.

The Framework sets a threshold for retail impact assessments – for development outside of town centres – of 2,500 square metres. Policy TCE1 seeks to establish a locally set threshold of 500 square metres. Whilst national policy supports the setting of local thresholds, there is no substantive evidence to demonstrate why the threshold in the Neighbourhood Area should be as low as 500 square metres. This is so significantly different to the national policy threshold that, without substantive reasoning and detailed supporting evidence, it leads Policy TCE1 to fail to meet the basic conditions.

I recommend:

- **Policy TCE1, replace the first sentence with "*The Henley Town Centre boundary is shown on the Henley Town Centre Plan.*" Delete the reference to the Core Strategy under the Town Centre Plan.**
- **Policy TCE1, change "500sqm" to "2500sqm"**

Policy TCE2: Market Place Hub

The first sentence of this Policy is vague and may have unintended consequences. For example, as worded, Policy TCE2 supports any form of development, so long as it would support Market Square as a focal hub. Also, the bullet points would benefit from clearer wording. Notwithstanding these two comments, the general aim of Policy TCE2 contributes to the achievement of sustainable development. I recommend:

- **Policy TCE2, delete first sentence and change second sentence to: "*The following development will be supported within Market Square:*"**
- **Policy TCE2, change bullet points to "*a) Use Class A3 Food and Drink uses, particularly in the northern part of the square; b) market stalls; c) secure cycle storage, particularly a covered facility.*"**

Policy TCE3: Hotel and bed space

The Framework supports tourism in town centres (Paragraph 23). The Policy has regard to this, but it is not clear what “*reinforcing bed provision*” actually means. There is no need to reference another Policy in the Neighbourhood Plan and in any case, it is not clear why only one other Policy would be relevant to tourism related development.

I recommend:

- **Policy TCE3, re-word as “*Provision of tourist accommodation within the town centre will be supported.*”**

Policy TCE4: Employment and residential above shops

As above, the Framework supports the vitality of town centres. This Policy has regard to national policy and contributes to the achievement of sustainable development. It meets the basic conditions.

Policy TCE5: Town Centre Car Park Management

The Neighbourhood Plan would like to see the introduction of a town centre car park management system. Policy TCE5 is not a land use planning policy. It sets out a local aspiration and references matters that can be sought by the Town Council but not necessarily controlled by the Neighbourhood Plan. I recommend:

- **Delete Policy TCE5**
- **Retain wording (but remove from box, so it is clear that the wording does not comprise a policy) and entitle as “*Community Action: Town Centre Car Park Management*”**

Policy TCE6: 16--18 Hart Street (Former Latino's Night Club) (Site AE)

This is a positive development Policy. It promotes brownfield development and with the exception of some unclear wording, it meets the basic conditions.

The second part of the Policy does not set out any meaningful or controllable requirements. It simply asks for a prospective developer to demonstrate how various things have been considered.

I recommend:

- **Policy TCE6, delete “as designated in the Key Diagram”**
- **Policy TCE6, delete from “Proposals for this site...” to the end of the Policy**

Policy TCE7: Town Centre Action Plan

It is not clear why every development within the town centre – or which may have some possible effect on the town centre (there is no definition of what such development might be) – needs to identify how it has considered every action of a Town Centre Action Plan, which itself, changes every year. There is no information to demonstrate that all of these actions within the Town Centre Action Plan are, or will be, relevant to every such development. Consequently, the requirements of the Policy are unduly onerous.

In addition to the above, there is no indication of what might happen if every action of the Town Centre Action Plan has not been considered – nor what benefits might arise from the consideration of every action.

To add to the confusion, the supporting text then goes on to provide a long list of fourteen actions that do not even form part of the Action Plan.

I recommend:

- **Delete Policy TCE7**
- **Create a new “Community Action: Town Centre Action Plan” with new text at the start of Paragraph 7.40 “The Town and Parish Councils will seek to encourage development that takes into account town centre actions listed in the Henley Town Centre Action Plan, as well as those listed below...” (retain all of the text in Paragraph 7.40)**

Employment

Policy E1: Supporting Henley's Economy

The first part of Policy E1 is reliant upon other Policies within another document beyond the control of the Neighbourhood Plan. The Policy then becomes confusing. It states that planning permission will be granted, but then goes on to state that certain uses will be prioritised. If something is granted, it is granted. The reference to prioritisation is therefore meaningless. This approach fails to provide decision makers with a clear indication of how to consider a development proposal.

The Policy states that the provision of office space within Henley will be granted planning permission. This is a wide and vague statement that is entirely reliant upon other Policies. It fails to provide prospective applicants with any clarity. For example, would a ten storey office block in a residential cul de sac be granted permission ?

The Policy then goes on to refer to specific sites that are considered in more appropriate detail in individual Policies elsewhere in the Neighbourhood Plan.

Taken as a whole, Policy E1 is poorly conceived, poorly worded and fails to meet the basic conditions. The Policy attempts to achieve too much and the result is confusing and inappropriate. I note that the Framework promotes the effective use of land and supports economic growth and my recommendation below takes this into account.

I recommend:

Policy E1, re--word as *“Development at Reading Road Industrial Estate that supports its role as the Neighbourhood Area’s main employment area will be supported.”*

Policy E2: Former Wyevale Garden Centre (Site P)

This Policy supports the re--use of a brownfield site for employment and for non--residential institutions. I note that Site P is a readily available brownfield development site and an objection considers that the site should be allocated for a C2 care home use. However, there is no substantive evidence before me to demonstrate that, in failing to allocate a site for a C2 care home, the Neighbourhood Plan necessarily fails to meet the basic conditions. As an aside, I note that there is no substantive evidence to demonstrate that a C2 care home would necessarily integrate well with employment uses and would not provide any constraint on employment uses coming forward.

The plan--makers consider that Site P is well--placed to contribute to the employment and culture of the local area and there is nothing to demonstrate that this is not the case. National policy supports the effective use of brownfield land and development that contributes to economic growth and healthy communities (with specific

reference to cultural buildings in Paragraph 70). There is nothing to clearly demonstrate that it would not be possible for Site P to viably deliver B1, B2 and potentially, D1 development. I am also mindful that the Neighbourhood Plan allocates a number of employment sites for residential use and that Site P provides alternative land for employment use in the Neighbourhood Area. In this regard, Policy E2 is in general conformity with Core Strategy policy CSSHEN1.

However, the Policy refers to another Policy in another Plan and in point e) sets out a viability requirement that goes beyond the control of land use planning policy. I recommend:

- **Policy E2, delete “in addition...CSQ4,”**
- **Policy E2, delete bullet point e)**

Subject to the above, Policy E2 contributes to the achievement of sustainable development and meets the basic conditions.

Policy E3: Henley Railway Station Car Park, South (Site W) and

The Framework is explicit in directing development away from areas at risk of flooding where development is not necessary. There is insufficient evidence to demonstrate that Site W can meet the sequential test set out in Chapter 10 of the Framework and as such, I find that Policy E3 fails to have regard to national policy. I recommend:

- **Delete Policy E3**

I note that the above recommendation does not prevent development from possibly coming forward at Site W, but that any development proposal would need to demonstrate that the relevant sequential test has been met.

Policy E4: Land at Newtown Road (Site AD)

This policy allocates brownfield land for development and as such, contributes to the achievement of sustainable development. No changes are recommended.

Environment

Policy EN1: Environmental Protection

Generally, Policy EN1 seeks to provide protection to environmental resources and in so doing, it contributes to the achievement of sustainable development

However, as worded, the Policy is unduly onerous and fails to justify why it goes well beyond any requirements set out in national policy or in the strategic policies of the Core Strategy. For example, it requires all development to enhance all watercourses, banks and associated river corridors; and requires all development, including for example, a household extension, to seek to improve public access to Harpsden Valley and enhance key viewing corridors.

The Policy attempts to achieve too much and ends up being unworkable, impossible to implement and largely irrelevant. This is a shame, as the aims of the Policy in respect of protecting key views have been the subject of much work.

In making my recommendations below, I note that the AONB is already afforded significant protection by national and local planning policy.

There is no evidence to demonstrate that all development impacting on viewing corridors (as opposed to all development) can enhance the viewing corridors. Consequently, it is inappropriate for this to be a requirement of the Neighbourhood Plan.

Some development in viewing corridors may comprise relatively minor development. It would be unduly onerous, for example, to require an application for a household extension to provide a Landscape Visual Impact Assessment as suggested in the supporting text. In this regard, I note that the supporting text is written as though it forms part of the Policy, which it does not.

The Plan on page 55 simply identifies viewing corridors. It does not set out Key Views, as suggested. The “Key Views” photographs show several nice views, but they do not provide precise information with respect to the viewing corridors. This is a problem. It is not clear how development can conserve something that is not, itself, clearly defined.

The supporting text states that “*the viewing corridors are fully described and set out in the supporting evidence base.*” I have considered the Viewing Corridors document that supported the Neighbourhood Plan. Whilst interesting, it is a brief, six page document that does not, in any way, comprise a detailed and precise definition of Viewing Corridors and nor can it be considered a clear and comprehensive guide for development.

Taking all of the above into account, I am not satisfied that there is sufficient detailed evidence to form the basis of a viewing corridor Policy, such that development within, or outside, the identified viewing corridors must preserve views within them, to them, or from them. Consequently, Policy EN1 does not meet the basic conditions as it fails to provide prospective applicants with sufficient detail, or decision makers with a clear indication of how they should react to a development proposal.

I acknowledge that the deletion of this Policy will disappoint plan-makers. However, I note that the work undertaken to date provides an excellent starting point for the creation of an evidence base upon which to found future planning policy.

I recommend:

- **Delete Policy EN1, replace with “Community Action: Viewing Corridors” and add text “The Town and Parish Councils will seek to progress the significant work already undertaken on Viewing Corridors within the Neighbourhood Area, with the aim of providing precise information that can help to provide the basis of future planning policy.”**
- **Delete Paragraphs 7.46, 7.48, 7.49, 7.50 and 7.51**
- **Introduce new sentence at start of Paragraph 7.45, “The viewing corridor areas are shown on the following plan and important views in the Neighbourhood Area shown on the following pages. The Town and Parish Council will seek to encourage development proposals within these areas to take full account of important views.”**

Policy EN2: New and Replacement Green Infrastructure and Public Open Spaces

It is not clear why Policy EN2 applies to residential developments of over 10 dwellings and it is not clear what contributions will be required from any such development. Green infrastructure, as defined, appears to relate to many, various things but nothing specific. The Policy is reliant upon another strategy controlled by another body.

Taking the above into account, Policy EN2 is unclear and fails to have regard to Paragraphs 203--206 of the Framework. It does not meet the basic conditions. I recommend:

- **Delete Policy EN2**

Policy EN3: Improve Existing Green Spaces

Policy EN3 is reliant upon a Policy recommended for deletion. Further to this, the Policy provides little clarity with regards what specific contributions will comprise and upon what basis they will be calculated. It fails to have regard to Paragraphs 203--206 of the Framework and does not meet the basic conditions.

- **Delete Policy EN3 and supporting text**

In recommending the deletion of Policies EN2 and EN3 I note that the more detailed site--specific policies in the Neighbourhood Plan refer explicitly to green infrastructure.

Policy EN4: Biodiversity

This is a sweeping Policy that places an onerous requirement on all development to enhance rural and urban biodiversity.

In reality, many development proposals will not be able to enhance rural and urban biodiversity, and nor will it be relevant for them to do so.

The general intention of the Policy – to protect and enhance biodiversity – has regard to the aims of national policy, as set out in Chapter 11 of the Framework (Conserving and enhancing the natural environment).

I recommend:

- **Policy EN4, change to “*The protection and enhancement of urban and rural biodiversity will be supported. Net gains in biodiversity, through the creation of new habitats; the enhancement of existing sites; and the development and implementation of ecological management plans, will be supported.*”**

Subject to the above, Policy EN4 contributes to the achievement of sustainable development.

Policy EN5: Historic Environment

Policy EN5 partially repeats guidance set out in the Framework. However, in so doing, it provides an incomplete approach to the protection of heritage assets. It provides no indication as to how development proposals will be considered. Heritage assets are recognised by the Framework (Chapter 12) as irreplaceable. As worded, Policy EN5 fails to have regard to the Framework and does not contribute to the achievement of sustainable development.

I recommend:

- **Delete Policy EN5**

Policy EN6: Contamination

This Policy concerns matters that are the responsibility of others, and not under the control of the Neighbourhood Plan. I recommend:

- **Delete Policy EN6**

Policy EN7: Water Resources

This Policy concerns matters that are the responsibility of others and not under the control of the Neighbourhood Plan. I recommend:

- **Delete Policy EN7**

Policy DQS1: Local Character

As noted earlier in this Report, good design is recognised by national policy as comprising a key aspect of sustainable development. It is indivisible from good planning and national policy requires good design to contribute positively to making places better for people (Para 56, the Framework).

Policy DQS1 seeks to ensure that design considerations make a positive contribution to local character in the Neighbourhood Area. In this way, the Policy has regard to national policy and contributes towards the achievement of sustainable development. It is in general conformity with Core Strategy policy CSQ3, which protects local character.

The Policy unnecessarily refers to other Policies and the second part could be made clearer for decision makers and prospective applicants. I note that the Chilterns Building Design Guide is referenced in the supporting text. I recommend:

- **Policy DQS1, change second sentence to “*Where Design Briefs are required, they should demonstrate how the proposed development will respond to local character in terms of design and materials.*”**

Policy DQS2: Low Carbon Sustainable Development

National advice establishes that:

“...qualifying bodies preparing neighbourhood plans should not set in their emerging neighbourhood plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development.” (Ministerial Statement, 25 March 2015)

The Policy does not meet the basic conditions. I recommend:

- **Delete Policy DQS2 (but retain Paragraph 7.55)**

Policy DSQ3 Local Sourcing of Construction Materials and Labour

The Neighbourhood Plan does not define what it means by “local construction materials” and “local labour” and provides no information to demonstrate the existence of relevant and appropriate local labour and local construction materials. Furthermore, there is no indication of what “will be maximised” means or how it will be measured.

Consequently, it is difficult to understand how Policy DSQ3 can be implemented. It does not provide clear guidance for prospective applicants and does not provide decision makers with a clear indication of how to react to a development proposal.

I recommend:

- **Delete Policy DQS3**

Policy DQS4: Community Energy Projects

As worded, Policy DQS4 could have unintended consequences. For example, it would support the development of 50,000 new homes, so long as a community energy projects were delivered.

However, the general aims of Policy DQS4 have regard to national policy, which supports the delivery of renewable and low carbon energy (Paragraph 93). I recommend:

- **Policy DQS4, re-word as “*Community energy projects will be supported.*”**

Subject to the above, Policy DQS4 contributes to the achievement of sustainable development and meets the basic conditions.

7. Neighbourhood Plan – Other Matters

The Delivery section of the Neighbourhood Plan is potentially confusing as the text appears to suggest that the Town and Parish Council will have a formal monitoring role, alongside South Oxfordshire District Council. This is not quite the case, although the Town and Parish Council will, of course, be free to monitor the impacts of the Neighbourhood Plan.

The text then refers to Policy SCI1, the deletion of which is recommended and goes on to state that key local items listed on page 79 “are established in various” Neighbourhood Plan policies. This is not the case. Paragraph 9.4 then refers to matters not under the control of the Neighbourhood Plan. The text also refers to the “adoption” of the Neighbourhood Plan, whereas, if successful at Referendum, the Neighbourhood Plan will be “made” rather than adopted.

I recommend the following:

- **Delete all text on page 79 with the exception of the list of bullet points and Paragraph 9.5. Above these, add “*The Neighbourhood Plan, once made, will provide policies that will form part of the development plan for the area and will thus help to determine planning applications. The Town and Parish Councils will monitor the impact of the policies of the Neighbourhood Plan.*”**
- ***The following items have been identified to help guide any spending by the Town and Parish Councils of funds resulting from Community Infrastructure Levy (CIL) and/or Section 106 Agreement payments: (retain list in 9.2)”***

8. Summary

I have recommended a number of modifications further to consideration of the Joint Henley and Harpsden Neighbourhood Plan against the basic conditions.

Subject to these modifications, the Joint Henley and Harpsden Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Taking the above into account, I find that the Joint Henley and Harpsden Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

I recommend to South Oxfordshire District Council that, subject to the modifications proposed, the **Henley and Harpsden Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area --- I am required to consider whether the Referendum Area should be extended beyond the Joint Henley and Harpsden Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Joint Henley and Harpsden Neighbourhood Area as approved by South Oxfordshire District Council on 10 June 2013.

Nigel McGurk, November 2015
Erimax – Land, Planning and Communities

www.erimaxltd.com

REGULATION 14 CONSULTATION HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

NOVEMBER 2021

Appendix C: REPRESENTATION REGARDING LAND AT LUCY'S FARM



JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN 2020-2035

Pre-submissions (Regulation 14) Draft

Representations prepared on behalf of Bloor Homes

November 2021



Report Control

Project: **Lucy's** Farm, Henley-on-Thames

Client: Bloor Homes

Job Number: 16.161

File Origin:

Document checking

Primary author: Owen Jones

Initialed: OJ

Issue	Date	Status	Checked for issue
A	12/11/21	Draft	OJ
B	16/11/21	Final	OJ



Policy DS1 –Preferred Housing Allocations

Introduction

1. These representations to the Joint Henley and Harpsden Neighbourhood Plan published in September 2021 have been prepared on behalf of Bloor Homes.
2. Bloor Homes control land referred to as **Lucy's Farm**, which is immediately east of the existing Neighbourhood Plan allocation at Site C - Gillotts School. We are aware that the consultation document proposed to retain this allocation. Unquestionably, this is an eminently suitable location for new housing development to meet the needs of Henley-upon-Thames. Given the **proximity of Lucy's Farm to Site C, those locational characteristics apply equally.**
3. **Successive assessments of this Site's suitability for development have identified the following** important considerations: it is not within the AONB or Green Belt, is not within or adjoining a conservation area, is not within an Air Quality Management Area, is not subject to any ecological designations, it does not include any heritage assets, it has a very low proportion of BMV, and is not at risk of flooding.
4. As a matter of principle, therefore, given firstly its location and secondly the absence of environmental constraints that would preclude development, **Lucy's Farm** represents an entirely appropriate Site for housing development.
5. Accordingly, Policy DS1 should include an additional allocation at **Lucy's Farm** for new housing; this would be in conformity with South **Oxfordshire's** Local Plan Policy H3.

The context for determining the amount of new housing to be provided

6. The South Oxfordshire Local Plan, which provides the strategic policies for the Neighbourhood Plan to conform with, intends **that "at least 1285 new homes"** are built at Henley-on-Thames.
7. The words **"at least"** are especially important for the reasons given by the Local Plan Inspector in respect of Matter 17.
8. **In the Inspector's Preliminary Conclusions and Post-Hearings Advice**, he comments that NDPs should seek to meet demonstrable local needs even where this would result in housing provision in excess of the minimum outstanding requirement.
9. The evidence of the worsening affordability of new housing at Henley-on-Thames has been widely recognised. Paragraph 3.12 of this current consultation document states:

"Henley is the most expensive area in the district to purchase accommodation across nearly all housing types, and is also the most expensive place to rent... house prices are



considerably higher than at the start of the 10-year period, with clear effects on affordability."



10. Affordability has consistently been made in earlier documents – for example, the Local Plan’s Sustainability Appraisal (para 7.6.2). The Sustainability Appraisal makes the important point that:

“allowing further growth at Henley-on-Thames will help to strengthen the existing employment and services available. It also provides the opportunity to contribute towards meeting the housing needs of the district. Affordability is a key issue in the town and the provision of additional development will bring wider benefits”

11. It is instructive that the *Environmental Report* supports exceeding the minimum requirement:

“Firstly, the SODC Local Plan is clear that requirement is a minimum figure, and is generally supportive of considering higher growth options. Affordable housing need can be one reason for seeking to provide for higher growth (recognising that affordable housing primarily comes forward as a proportion of market housing), and this argument does apply in the Henley context; indeed, it applies very strongly. Whilst calculating affordable housing needs is not an exact science, needs are explored within the Henley Housing Needs Assessment (HNA, 2020), which finds that the total need for affordable housing, over the plan period, is in excess of the total number of homes anticipated to come forward (see paragraph 6). This indicates an acute situation, and concerns are further increased on the basis of past affordable housing delivery and tenure split considerations.

Secondly, there is a need to consider providing for more than 69 homes through the Revised JHHNP to account for housing needs arising from Harpsden. However, these are likely to be modest, given a current population of ~560 and recalling that Local Plan Policy H8 encourages an increase in dwelling stock at smaller villages of 5-10% over the period 2011 to 2035.

Thirdly, it is good practice to provide for a ‘supply buffer’ on top of the requirement, in the knowledge that one or more of the sites within the supply may be subject to unforeseen delivery issues; for example, the plan might aim for a 10% buffer over-and-above 69 homes outstanding requirement figure, which would suggest a need to identify a total supply of circa 75 homes.”

(Paras 5.6 – 5.8 refer)

12. It follows that the Neighbourhood Plan should look to do all it can to improve the affordability of housing – it is unanswerable that social inclusion is a cornerstone of sustainability – leaving no stone unturned.
13. As a matter of principle, therefore, there can be no quarrel with the Neighbourhood Plan provides a level of housing that exceeds the minimum requirement so long as this does not give rise to unacceptable environmental effects.

The preferred sites and housing supply

14. The Housing Topic Paper suggests that the residual requirement to be met between 2021 and



2035 is a mere 69 new homes.

Local Plan Policy H3	At least 1285 new homes
Completions and Commitments as at April 2021	1216 new homes
Minimum outstanding requirement	At least 69 new homes



15. Policy DS1 of the consultation document lists the “preferred” sites for housing development. A number of these sites are carried forward from the existing made Neighbourhood Plan (Sites C, E, F and X), whilst others are increases in the capacity of sites in the existing made Neighbourhood Plan (Sites A1 and J). Two are new sites, most significant of which is a new allocation at Highlands Farm enlarging and extending the current development and increasing the amount of new housing in the AONB. an allocation of three houses at Site Y is inconsequential.
16. Together, the amount of new housing proposed at these preferred sites totals 377 new homes, of which 145 are additional to existing allocations in the Neighbourhood Plan and existing commitments.
17. Therefore, the Neighbourhood Plan proposes only 76 more houses than the minimum required by the Local Plan (145 – 69); some 7% additional housing. However, this must be seen in the context of the following:
 - a. The consultation document proposes to carry forward sites first allocated in 2016 that have yet to be delivered – Site A1, Site C, Site E, Site F, Site J and Site X; this gives rise to a need to consider the likely incidence on non-implementation and what allowance should be made for this.
 - b. The housing type offered by a number of these sites will not provide the range and choice required locally.
 - c. Only one new Site is proposed at Highlands Farm Site M1.
 - d. In the face of the affordability issue at Henley-on-Thames, the Local Plan Inspector plainly supports exceeding the minimum requirement to the greatest extent possible where sites are suitable for development.
18. In the context described in previous section, and when there are other, additional suitable sites for housing, the scale of housing proposed in the consultation document does not contribute to sustainable development and is harmful to social objectives. This fails the basic condition test for a Neighbourhood Plan.

Local Housing Needs

19. Topic Paper 2 suggests that the need for affordable housing over the plan period equates to some 1300 new homes. Plainly this is greatly in excess of what the housing requirement identified by the Local Plan will deliver. Later in the Topic Paper, potential supply of affordable housing is discussed, and the forecast delivery is significantly less than identified need.
20. The premise that the Local Plan Inspector advanced remains entirely appropriate i.e., to meet the demonstrable need for affordable housing, the minimum housing requirement should be exceeded.



The type of housing that should be provided

21. The Housing Needs Assessment (HNA) 2020, indicates that the focus should be on boosting the number of mid-size homes, with a lower amount of larger homes but very few small homes.:
22. The Strategic Housing Market Assessment similarly identifies the greatest need for family housing.
23. This is important evidence in understanding the type of housing that should be provided through the Neighbourhood Plan. For example, the proposed allocations at Site X and Site J will inevitably require densities which conceive flatted accommodation rather than family housing.
24. There has already been a predominance of apartment development and elderly persons accommodation derived from the emphasis in the Neighbourhood Plan on sites within the town centre. Added to this have been a number of Office to Residential conversions which are characterised by further flatted development.
25. These characteristics point towards the need for additional sites to be allocated for development that are suitable for family housing.

The Suitability of **Lucy's** Farm for family housing

26. The site has been considered through successive South Oxfordshire Strategic Housing Land Availability Assessments, each of which conclude that this is a suitable site for development in the future.

The 2013 assessment - suitable in principle with no overriding constraints

27. In the 2013 Strategic Housing Land Availability Assessment, this site is identified as HEN1. This states:
 - there is scope to develop the northern most part of the site provided the landscape enhancements to the plateau edge are implemented;
 - development on the northern most part of the site (the reduced site) can be mitigated through setting back the built form away from the plateau edge and substantial woodland planting along the southern boundary. This would achieve a more robust landscape edge to the town to the rear of **Blandy's** Road which would link well into existing woodland and tree cover;
 - in a short to medium time views of the new urban edge from the AONB would be screened, without introducing inappropriate elements into the landscape;
 - a belt of Green Infrastructure should also be able to provide additional ecological and recreational benefits;
 - density should take account of the low density of the housing to the east but could approach



the density on **Blandy's** Road along its northern edge, provided the character of a well treed



urban edge to Henley is conserved. On this basis some 110 to 130 dwellings might be accommodated; and

- in principle, OCC Highways & Transport officers would accept development of the number suggested at this location providing access is taken from Blandy Road.

28. It concludes that the Site is considered suitable in principle as it has no overriding constraints. None of the assessments that have followed have demurred to any material extent from these conclusions.

The first 2017 assessment - suitable, available and achievable

29. In the ARUP Assessment (published in March 2017), the site proforma concludes that the site (now referenced 955) is Suitable, Available and Achievable and gives an indicative capacity of 172 dwellings. This also confirms that the site is not within the AONB, is not within or adjoining a conservation area, has a very low proportion of BMV, is not within an AQMA, is not subject to any ecological designations and does not include any heritage assets and is not at risk of flooding. It similarly records a **"willing landowner"** and that the site in an area of market **attractiveness determined as "high"**. **More generally the site adjoins the Neighbourhood Plan allocation at Gillott's School, this confirming the principle of residential development in this location.**

The second 2017 assessment - suitable, available and achievable

30. The 2017 SHELAA published alongside the First Version Publication Local Plan categorises this site differently (ref 1126). Although there has been no change in circumstance so far as the listed constraints are concerned, or the market attractive of the site, on that occasion the site is referred to Suitable only (ie not Available and not Achievable). This was discussed with the LPA who accept that the categorisation should be Suitable, Available and Achievable, and the 2017 Assessment was, in so far as this site is concerned, incorrect.

The 2019 assessment - appropriate for further assessment and available for development

31. The 2019 SHLAA concludes that this site is not subject to any intrinsic constraints, does not include any designated heritage assets, does not have any known infrastructure constraints, and benefits from access to the public highway. It is considered appropriate for further assessment and is available for development.

The AECOM assessment - not suitable for residential development and therefore not appropriate for allocation in the plan

32. Despite these very consistent previous conclusions over a number of assessments, the AECOM assessment undertaken on behalf of the Neighbourhood Plan Group formed a different view **that Lucy's Farm should be categorized as a RED Site and "not suitable for residential development and therefore not appropriate for allocation in the plan"**.



33. The assessment schedule records that the following opinions have been reached by AECOM in respect of this Site:
 - i. This site is not in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is adjacent rather than within the built- up area.



- ii. The site is not suitable for allocation in the Neighbourhood Plan as it does not meet local policy. There are also a number of other constraints that impact the sites suitability including access and potential risk of coalescence between Henley and Harpsden.
 - iii. The site may be suitable on policy grounds should the emerging plan become adopted policy, see paragraph 1.16 of the main report
34. The two constraints referred to – access and potential risk of coalescence - do not follow (1) the earlier conclusions that a means of access can be provided from Blandy Road and (2) the more granular landscape assessment undertaken by Kirkham Landscape Planning and Terra Firma that development can be sensitively accommodated on the northern part of the site, continuous with the existing urban area to limit the impact on the adjacent AONB, the village of Harpsden and the character and visual qualities of the open countryside setting to Henley.
35. Moreover, the Policy context relied upon by AECOM was the previous Local Plan, which has now been superseded and does not constrain new housing at Henley-on-Thames to the same extent. It is for this Neighbourhood Plan to identify housing sites without being bound to an earlier settlement boundary.
36. Despite the AECOM **Study's obvious limitations, which were communicated to the** Neighbourhood Plan Group upon its publication, this work appears to be the basis of the Strategic Environmental Assessment and Site Selection explained in the Housing Topic Paper and Environment Report (i.e., RED Sites were not considered further because of the policy conflict). Plainly this is irrational as it has ignored relevant and material considerations.
37. Because of this approach, the consultation document is not founded on sufficient and proportionate evidence.
38. Conversely, if the Site Selection process was based on the more rounded evidence of suitability, **rather than an erroneous policy conflict and misconceived constraints, Lucy's Farm would be** categorised as a suitable site that could contribute to improving the supply of family housing at Henley-on-Thames without giving rise to unacceptable environmental effects.

Conclusions

39. The need to increase the supply of housing at Henley-on-Thames in order to meet local housing needs is unarguable; **Henley-on-Thames' characteristics in this regard are exceptional.**
40. The unavoidable context within which the Neighbourhood Plan is being prepared is based upon the principle of exceeding the minimum outstanding housing requirement to the fullest extent possible without giving rise to unacceptable environmental effects.
41. **Lucy's Farm** is an eminently suitable site for new housing:
- (1) in terms of location, it adjoins an existing allocation in the made Neighbourhood Plan which is being carried forward;
 - (2) the site it is not within the AONB or Green Belt, is not within or adjoining a conservation area, is not within an Air Quality Management Area, is not subject to any ecological



designations, it does not include any heritage assets, it has a very low proportion of BMV, and is not at risk of flooding.

42. The AECOM assessment which has been the basis of the Site Selection has misdirected the plan making process; it adopted the wrong premise by alighting upon on out-of-date Local Plan settlement boundary and then failed to have regard to plainly relevant and material conclusions about access and landscape impact in earlier assessments.
43. Accordingly, Policy DS1 should include an additional allocation at **Lucy's Farm** for new housing; this would be in conformity with the Local Plan Policy H3.

LRM Planning Ltd

November 2021

REGULATION 14 CONSULTATION HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

NOVEMBER 2021

Appendix D: REPRESENTATION REGARDING HOUSING ALLOCATIONS AND SITE ASSESSMENT



Joint Henley and Harpsden Neighbourhood Plan

e: enquiries@henleytowncouncil.gov.uk

15 November 2021

Dear Sir

Pre-Submission Draft Joint Henley and Harpsden Neighbourhood Plan (the draft Neighbourhood Plan).

Thank you for the opportunity to submit comments in relation to the draft Neighbourhood Plan. Whilst I am aware that there is the ability to submit representations via an on-line form, given the focussed nature of the submission below, it was evident that completion of the on-line form would not allow these comments to be submitted in the detail sought. Nevertheless, for the purposes of this submission I can confirm that my contact and address details are those below, and that the submission is made on behalf of a land/business owner located in the Neighbourhood Plan Area.

As detailed below, the submission is focussed in two areas:

- Housing Allocations
- Housing Site Assessment

These matters are considered in turn below.

Housing Allocations

Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 states that Neighbourhood Plans must comply with the basic conditions set out therein. Paragraph 8 states, *inter alia*, that the plan must:

- Have regard to national policies and advice, such as the National Planning Policy Framework;
- Contribute to the achievement of sustainable development; and
- Be in general conformity with the strategic policies in the development plan for the area.

The pre-submission baseline report (the Baseline Report) identifies that one of the housing objectives of the Neighbourhood Plan is to ‘*identify land for new housing as required by the South Oxfordshire Local Plan Policy H3*’ (Housing Objective HO1).

Policy H3 (Housing in the Towns of Henley-on-Thames, Thame and Wallingford) of the adopted Local Plan sets a minimum housing requirement for 3,873 homes at Henley-on-Thames, Thame and Wallingford over the plan period, of which at least 1,285 homes are to be provided at Henley-on-Thames. Table 4D, at paragraph 4.16 of the adopted Local Plan, indicates that of the 1,285 homes to be provided at Henley-on-Thames, there were 1,170 completions and commitments to 01 April 2020 and, therefore, a minimum outstanding requirement of 115 dwellings to be identified through the Neighbourhood Plan. The Baseline Report indicates that, in the period from 01 April 2020 to 01 April 2021, an additional 46 dwellings had been provided towards the housing requirement, leaving a residual requirement for 68 (sic) dwellings ‘*to be identified in the Neighbourhood Plan*’¹.

Given the terms of the basic conditions set out above, the fundamental question – having regard to the housing allocation(s) in the draft Neighbourhood Plan – is whether the requirements set out in Policy H3 are met. For the reasons detailed below, conclusion has to be that they are not.

In this regard, the National Planning Policy Framework (the Framework) sets an over-arching requirement that – in Development Plans – planning policies ‘*should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*’ (Paragraph 68). That is, that identified/allocated housing sites are deliverable. The Framework defines deliverable as follows:

‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

(b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of planning permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completion will begin on site within five years’.

In this case, the 1,170 housing completions and commitments identified at Henley-on-Thames over the plan period to 01 April 2020 includes 212 homes from those sites allocated in the existing Neighbourhood Plan², albeit none of those sites are shown (from a base-date of April 2020) to be delivering housing completions within five years (i.e. they should not be treated as ‘commitments’). On the contrary, the 01 April 2020 data indicates that deliverable completions and commitments at Henley-on-Thames are only 948 homes.

Notwithstanding such, the draft revised Neighbourhood Plan ‘rolls-forward’ the majority of the housing allocations in the made Neighbourhood Plan (2016) to the draft Neighbourhood Plan. Details of those sites ‘rolled-forward’ in to the draft Neighbourhood Plan are shown outlined in orange in Table 1 below.

¹ It should, however, be noted that Policy H3 of the adopted Local Plan clearly states the minimum number of homes to be identified in the Neighbourhood Plan as 115. To plan for less than that number in the Neighbourhood Plan would place the Neighbourhood Plan in conflict with Policy H3 of the adopted Local Plan.

² Information taken from a spreadsheet of data supplied by the Planning Policy Team at South Oxfordshire District Council.

Made Neighbourhood Plan (Outstanding Sites)		
Site	Dwelling Allocation	Planning Status
A - Land west of Fair Mile	60	Undetermined Application (P19/S2350) for 72 dwellings
C - Gillots School Playing Field	50	No application
E - Empstead/Stuart Turner	42	No application
F - Chiltern's End	27	No application
J - 357 Reading Road	30	No application
V - TA/RAR Centre	10	No application
X - Henley Youth Club	23	No application
TOTAL	242	
Draft Neighbourhood Plan		
Site	Dwelling Allocation	Planning Status
A1 - Land west of Fair Mile	72	Undetermined Application (P19/S2350) for 72 dwellings
C - Gillots School Playing Field	50	No application
E - Empstead/Stuart Turner	42	No application
F - Chiltern's End	27	No application
J - 357 Reading Road	50	No application
M1 - Highlands Farm	110	No application
X - Henley Youth Club	23	No application
Y - Chilterns Centre	3	No application
TOTAL	377	
Total (Existing Allocated Sites)	264	

Table 1: Comparison of Allocated Housing Sites: Made Neighbourhood Plan and Draft Neighbourhood Plan

As set out in Table 1, there are six allocated housing sites in the made Neighbourhood Plan (accounting for 232 dwellings) that are 'rolled-forward' in to the draft Neighbourhood Plan (and allocated, therein, for 264 dwellings). Fundamentally, and with the exception of Site A that has an outstanding planning application for 72 dwellings (albeit it is unclear why this remains undetermined two years after submission), these sites are considered to fail the test of deliverability as defined in the Framework. In particular:

- Each of these sites would have been tested for 'deliverability' prior to their allocation in the made Neighbourhood Plan (that is, prior to the plan being 'made' in April 2016);
- Since the Neighbourhood Plan was 'made' in 2016 there have been no planning applications submitted on these sites consistent with the allocation in the made Neighbourhood Plan³;
- Indeed, in relation to the majority of these sites there has been no meaningful progress in bringing forward the housing allocation in this period. Moreover, in the case, for example, of Gillots School, housing development has been mooted for the last ten years but no progress has been made.

³ The only material application on any site related to Site X for C2 provision, that was refused partly on the basis of the conflict with the allocation in the made Neighbourhood Plan.

- There is no material or compelling evidence in the background material associated with the draft Neighbourhood Plan to indicate that the deliverability of these sites has been further tested sufficient to justify their continued allocation (notwithstanding the increased housing allocation on a number of those sites).

In short, and with the exception of Site A, these sites have been identified and allocated for housing development in the Development Plan for **at least the** last five years and none have made any progress towards delivering housing. In fact (and again with the exception of Site A) none have even been subject to a planning application for (C3) housing development. They are, clearly, not deliverable when assessed against the definition of such in the Framework.

Despite the lack of evidence of deliverability, these sites are 'rolled-forward' as allocations in the draft Neighbourhood Plan. This is contrary to national policy and advice. The draft Neighbourhood Plan therefore fails one of the Basic Conditions.

Accordingly, the draft Neighbourhood Plan should be amended to do either one of the following:

- Option 1: Delete housing allocations C, E, F, J and X from the Plan and allocate a minimum of 192 homes to alternative, deliverable sites⁴; or
- Option 2: Retain housing allocations C, E, F, J and X in the Plan, but in recognition of the serious and well-evidenced doubts regarding their deliverability (and the 'minimum' requirement of Policy H3 of the adopted Local Plan, to allocate additional (deliverable) sites for a minimum of a further 192 homes (subject to footnote 4).

Given the fundamental lack of evidence and serious doubts regarding the deliverability of the above noted sites, only by following either of Options 1 or 2 would the Plan comply with the Basic Conditions.

Housing Site Assessment

Whilst the matters set out above demonstrate that the draft Neighbourhood Plan is unsound, serious concerns are also expressed regarding the robustness and consistency of the various Site Assessment Reports prepared by AECOM. In particular:

- There is no consistency or clarity between the analysis and assessment of potential housing sites (and the judgments made therein) and the primary housing objectives of the Plan;
- The criteria for assessing housing sites is unclear and, from the limited information that is available, lacks robustness or consistency of application;
- There is no evident correlation between the findings of the Site Assessment Consultation undertaken in the summer of 2021 and the draft housing allocations (notwithstanding the matters set out below). The Site Assessment Consultation Report indicates that the consultation exercise was intended to '*help guide*' the decision on which sites to allocate, but there is no evidence that it had any effect whatsoever. On the contrary, a number of the sites allocated in the draft Neighbourhood Plan performed poorly in the consultation exercise,

⁴ Recognising that the deliverability of Site A should also be treated cautiously given the lack of a decision on the planning application in two years.

whereas those better performing sites⁵ are excluded from the draft Neighbourhood Plan – indicating the consultation exercise is/was of little value to the overall process with, it would appear, a lack of detailed scrutiny of the AECOM Report (notwithstanding the expectation that it was professionally prepared);

- The vast majority of potential housing sites are dismissed as they are deemed contrary to Policy H4 of the (now superseded) former South Oxfordshire Local Plan 2021 - on the basis that they are not considered to be within the built-up area. That approach is unsound. Henley is well-recognised for being constrained and that to deliver appropriate and proportionate growth consistent with the Market Town status, it is likely that outward expansion of the town (beyond its current built-up limits) would be required. That was the case with the (delivered) housing sites in the made Neighbourhood Plan, and there is no expectation or limitation that the draft Plan should not, and cannot, do likewise;
- Notwithstanding the above, the single additional (significant) housing allocation in the draft Neighbourhood Plan – Site M1 – is justified in the AECOM Report on the basis that *‘the site (once the wider site construction is complete) is within the built-up area’* and *‘The site’s suitability would remain the same should the emerging plan become adopted policy, as it is in conformity with Policy H1 as the site is appropriate infilling within the existing built-up area’*. That justification does not stand up to any level of professional scrutiny. The site is simply not within the built-up area of Henley-on-Thames and to suggest it is fundamentally undermines the credibility of the whole Site Assessment Report;
- The implications are, nevertheless, significant since it is that judgment that is used to set site M1 apart from other submitted potential housing sites on the edge of the built-up area. That leads to inconsistent and inappropriately justified decision-making. If correctly assessed as a potential housing allocation on the edge of, but outside, the built-up area, then to ensure consistency a comparative assessment ought to be made against those other edge-of- settlement sites that have been submitted. That is, if there is consistency of decision-making, those other sites on the edge of the settlement, and no less well related to the built-up edge than site M1, should not have been dismissed for this reason, but equally assessed against relevant criteria;
- Conversely, if site M1 is held to be within the built-up area or represents appropriate infilling – as AECOM allege – then there are other submitted sites no less well-related to the built-up area and no less constituting infill that should not have been dismissed in the AECOM report for this reason (for example, Site 1158 (Swiss Farm International, Marlow Road) that, by any reasonable comparison with Site M1, would be more appropriately judged as being within the built-up area); and
- The Site Assessment undertaken by AECOM was the principal focus of the Summer 2021 consultation in respect of the proposed housing allocations in the draft Neighbourhood Plan. Accordingly, the errors and inconsistencies in that assessment would not only have reduced the validity of any findings arising from that consultation exercise, it would have unacceptably skewed the results.

⁵ That also include the prospect of delivering additional community facilities and benefits, such as site 1158 – Swiss Farm International, Marlow Road.

The implications of the above factors, which lead to an allocation (Site M1) that is not positively justified or well-reasoned, are significant. Site M1 is located in the Chilterns Area of Outstanding Natural Beauty (AONB) an area that should, as per the Framework, be afforded great weight for the conservation and enhancement of its nationally important and recognised landscape and scenic beauty. Accordingly, by erroneously dismissing other sites (that may be outside the AONB or in less sensitive parts of the AONB) the approach obviates what should be an appropriate comparative assessment of the landscape impact of potential sites. Whilst it is recognised that landscape impacts alone are not the decisive/determining factor in allocating sites, it is an important and critical part of the exercise, and by wrongly justifying Site M1 as being within the built-up area or representing appropriate infill (and thereby dismissing other sites with similar characteristics), AECOM have 'side-stepped' an essential part of the analytical process. That is a fundamental and unjustified failing that undermines the soundness of the plan.

For these reasons, therefore, the draft Neighbourhood Plan is considered to be unsound, with the failings only capable of being addressed through Options 1 and 2 noted above (relating to housing allocations) and a fundamental review, from first principles, of the submitted housing sites against clearly defined and reasoned objectives and applying consistent planning judgements throughout.

Yours Faithfully



Jake Collinge BSc (Hons) DipTP MRTPI

cc.Jodie Rhymes – Planning Officer, Henley Town Council

REGULATION 14 CONSULTATION HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

NOVEMBER 2021

Appendix E: REPRESENTATION FROM CHILTERN CONSERVATION BOARD



The Chilterns Conservation Board:

- (1) **Objection raised against Proposed Allocation in policy DS7 of Site M1 Land North of Highlands Farm.**
- (2) **Promotion of our model policy for inclusion in the draft Neighbourhood Plan.**

15th November 2021

1.0 Introduction and overview of the CCB's case.

1.1. The Chilterns Conservation Board (CCB) raises **objection** to the allocation in policy DS7 of site M1 (land north of Highlands Farm) for 110 dwellings on the principal ground that this significantly harms the AONB and, therefore, demonstrably fails to deliver the core duties in law (the Countryside and Rights of Way Act section 85), in national policy (paragraph 176 of the NPPF) and in the Local Plan (ENV 1). We understand the difficult balancing of priorities that confront the neighbourhood plan steering group but conclude that this allocation will not satisfy the basic conditions test, should the matter proceed to the examination stage. We, therefore, urge its deletion. In support of this recommendation, we set out below our supporting case.

1.2. We also recommend inclusion of our model AONB policy within the Neighbourhood Plan.

2.0. SODC Examination, Inspector's Conclusions and Adopted Policy.

2.1. The CCB appeared at the SODC Local Plan examination in August 2020. We focused on SODC Local Plan policy H3 '*Housing in the towns of Henley-on-Thames, Thame and Wallingford*'. The CCB submitted that H3 set too high a target housing figure for Henley-on-Thames, in that the town is heavily constrained by the AONB. The town positively benefits from that relationship as the Chilterns dipslope and wooded pastures add a strong backdrop setting to the settlement pattern, looking both north to Bix and south-west to Harpsden. The settlement is tightly enveloped by a wooded and semi-wooded dipslope landscape to the north and a semi-enclosed dipslope to the south-west. The original locational desirability of Henley being a combination of riverside meadows enveloped by upland wood pastures. The folded valley sides of the landscape are evident in the 'Fair Mile' as you enter Henley from the north, continuing the incised dipslope where the Chilterns landscape gradually falls away to the east of the escarpment, towards the Thames and the direction of London.

2.2. CCB argued that a 15%+ uplift development target placed considerable pressure on the setting of the AONB and within the AONB itself. The NPPF para 172 test (as in place at the time) quite rightly sought to resist major development in the AONB, unless justified exceptionally, including with regard to the potential for need to be met on alternative site outside of the AONB. The CROW Act section 85 gives the conservation and enhancement duty in the NPPF a legal authority and this applies to all matters that affect the AONB ¹. Further, the NPPF para 172 test envisaged that development within the AONB will be, by

¹ **Section 85** of the **CRoW Act** places an explicit duty on relevant authorities to have regard to the purpose of conserving and enhancing the natural beauty of an AONB when exercising or performing any function in relation to or so as to affect an AONB

definition, limited. The NPPF was updated in July 2021, maintaining in para 176 the presumption that development within AONBs will be limited.

2.3 The presumption of JHHNP policy H3 is that 156 additional dwellings will be located within the NP boundary, albeit with a minimum outstanding requirement of 69 (as of now). The existing and made NP seeks to accommodate 450 new homes with a policy target that 80% are delivered on previously developed land (PDL). We could not find the 80% target as a carried forward policy in the new draft plan.

2.4. The SODC Local Plan Inspector, in his report, discussed the 15%+ threshold figure and made the point that (his 184), *'However, paragraph 5.16 of the Plan appears to allow neighbourhood plans to deliver below 15%, whereas there is no convincing evidence that this is necessary to avoid harm to any of the towns, the surrounding landscape, the AONB or other designations'*. In coming to his conclusions, the Inspector was clear that the Local Plan's policy protections (particularly policy ENV1) would be sufficient to protect the AONB - he was alert to the policy tests that would have to apply to development proposals and future allocations, cited the CROW section 85 test in his report at footnote 3. He was not writing a blank cheque for development to take place in the AONB.

2.5. CCB's key submission to the NP Steering Group is that site M1 (north of Highlands Farm) manifests as development that will inevitably cause harm to the Chilterns AONB as a result of its scale and location, and therefore cannot satisfy policy ENV1. The supporting papers to the draft Neighbourhood Plan accept that harm follows to the AONB (see below where we deal with the AECOM Environmental Report).

2.6. Compliance with the basic tests as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 requires (amongst others) that, (e) *the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)*.

2.7. Please refer to Planning Practice Guidance **'The basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum'**, Paragraph: 067 Reference ID: 41-067-20140306, revision date: 06 03 2014 (accessed 11th November 2021).

3.0. Highlands Farm – Planning History and landscape issues.

3.1. The CCB has been heavily engaged in developments at Highlands Farm, following the developer's early approach to us ahead of the pre-application stage in the autumn of 2015. In all our early engagement, we made the point that Henley was enhanced by its AONB context. Highlands Farm, as a previously developed site, presented a rare but sensitive opportunity. Its location was separated from the nearby settlement, and, in this respect, the location was weak when assessed against criteria for sustainable development. Any development here, CCB argued, must be finite as it is heavily constrained by its AONB location.

3.2. We append below two plans that show the location of the AONB boundary (tightly drawn around the settlement) and the neighbourhood plan boundary. Highlands Farm is denoted, which illustrates its isolated location and the fact that it is wholly enveloped by the AONB. The landscape around southwest Henley and enveloping Highlands Farm is all contained within the **SODC landscape character area 10 Chilterns Plateau with Valleys**. The immediate landscape around Henley and mostly within Harpsden Parish, is classic semi-enclosure dipslope, with a combination of open vistas and relatively enclosed landscapes. The SODC study, a key component of the Local Plans evidence base, contains landscape guidelines/mitigation recommendations. The key one, as applicable here, includes the recommendation to **'Maintain the nucleated pattern of settlements'**. To develop Site 853(a) would result in diffuse, not nucleated, development that demonstrably erodes the wider Chilterns landscape and results in a tangible 'sprawl' from Highlands Farm towards Henley. The CCB consistently argued, when at pre-application and outline and detailed (reserved

matters) stages, that Highlands Farm must be seen as a finite development. Its PDL status being pivotal in the demonstration of exceptional circumstances when the principle of development was dealt with at the application stage. **The Highlands Farm pit SSSI** forms part of a woodland network that runs south and east of this site. The SSSI is also a nationally important Palaeolithic Scheduled Monument. Work by Cotswolds Archaeology for CgMs Consulting (2016) identified the significance of this site and the need for further investigation. Protection of its setting is a material consideration and the land to the north is a key part of that setting.

4.0. Neighbourhood Plan and Background Papers.

4.1. The draft Henley and Harpsden Neighbourhood Plan rightly and properly acknowledges the special qualities of its locality. **Proposed policy EO1** prioritises the AONB and includes adverbs such as 'protection' and 'enhancement'. **Proposed policy EO4** seeks to enhance the natural environment. Weight and attention are given to the AONB, with specific reference to the AONB at paragraph 7.63. This commentary also chimes with the existing Neighbourhood Plan, which states in its vision (page 21) and at paragraph 5.12 that, '*Henley and Harpsden have a wealth of environment and heritage assets including the Chilterns AONB, River Thames flood plain, Henley conservation area and several listed buildings*'.

4.2. We have considered the background supporting documents. The methodologies deployed by the AECOM consultants tends to avoid the rigorous protective policy tests that deliver the conservation and enhancement of the special qualities of the AONB. The Housing Topic Paper (September 2021) at its 15.7 encapsulates the AONB as a significant policy constraint. Whilst we understand this point, the AONB is also a significant policy opportunity, because it promotes both a sense of place, sense of belonging and public benefits, including recreational and amenity benefits. Two significant public rights of way transect the landscape. The Housing Topic Paper makes the point that Highlands Farm and the proposed allocation, once completed, would be '*within the built-up area*'. This is questionable logic. The report casts the balance of issues between public benefits (i.e., housing, and affordable homes) against harm to the landscape. No attention is given to the public benefits *derived from* the AONB and no attempt is made to give '*great weight*' to the AONB as is set out in the NPPF and the CROW section 85 tests.

4.3. In the environmental report reference is made to the **SODC (2017) study into landscape capacity for the 4 market towns**, with the point made that this site exhibits limited landscape sensitivity. This is Site HEN5 in that study, which concludes that the parcel of land, as now proposed, is taken forward for further consideration. It is important to note that this study also concludes that on the **relationship with adjacent wider countryside**, that '*The site has close affinity with the wider AONB landscape, notwithstanding the neglect of the fields • The southern part of the site is located in a typical Chilterns dry valley • High levels of intervisibility between the site and surrounding AONB landscape*, and that **Potential impact on the AONB**, include • *Impact on the special qualities of the Chilterns Plateau with valleys • Impact on views from the AONB across open countryside*. This document is a part of the evidence base and is not a definitive document to support any extra housing allocation but one of many background documents to be appraised. Either way it is by no means a green light to allocate this site.

4.4. The AECOM Environmental Report encapsulates this site as an '*easy win*' (5.17) but that there is a clear sensitivity (5.18) and that its delivery takes the total housing supply to the target figure with an oversupply of + 110% (5.26). The Environmental Report accepts that the impacts would result in a '*significantly negative effect on the landscape*' (9.50 and 10.3). This is the purpose of an SEA/SA. Attempts in this report to balance the harm against other matters takes it beyond the traditional realms of an SEA/SA.

5.0. General Policy Approach.

5.1. This draft Neighbourhood Plan does contain a large section of nationally protected Chilterns AONB. This defines its location in a striking and highly beneficial way. We commend our model AONB policy and set that out below. We commend this policy for inclusion in the plan.

6.0. CCB's overall recommendations.

6.1. To **delete** this allocation. The principal ground being the demonstrable harm to the landscape character and special qualities of the AONB, including wider views across it from the network of footpaths that criss-cross this landscape. No exceptional circumstances exist. The AONB helps to define what is special about Henley and Harpsden. Highlands Farm must be seen as a finite development, limited by its previously developed status. It is set away from the town and self-contained. To develop 110 houses here would create a 'ribbon' of development that would constitute an unacceptable outward sprawl, diminishing the very special rural and nationally protected hinterland to the town. To allocate this land would be inherently unsustainable.

(2) To include an AONB policy and we submit our model policy in this regard.

CCB's Model Local Plan policy and supporting text

Policy x The Chilterns Area of Outstanding Natural Beauty

Permission for major developments in the Chilterns Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:

- a. conserves and enhances the Chilterns AONB's special qualities, distinctive character, tranquility and remoteness in accordance with national planning policy and the overall purpose of the AONB designation;**
- b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment;**
- c. meets the aims of the statutory Chilterns AONB Management Plan, making practical and financial contributions towards management plan delivery as appropriate;**
- d. complies with the Chilterns Building Design Guide and technical notes by being of high quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character; and**
- e. avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.**

Model local plan supporting text

1. Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. In policy terms they have the same planning

status as National Parks². The Chilterns AONB was designated in 1965 and extended in 1990. The Countryside and Rights of Way Act 2000 places a statutory duty on local authorities to have regard to the purpose of conserving and enhancing the natural beauty of AONBs when coming to decisions or carrying out their activities relating to, or affecting, land within these areas³.

2. The Chilterns AONB covers 13 local authorities and the Councils work together to safeguard the future of this shared nationally protected area through the Chilterns Conservation Board. The Board prepares a statutory AONB Management Plan which *may be* / has been endorsed as a material consideration in planning decisions⁴.
(delete as appropriate)
3. The AONB is a nationally designated landscape and as such permission for major developments will be refused unless exceptional circumstances prevail as defined by national planning policy⁵. National guidance explains that whether a proposal constitutes major development is a matter for the relevant decision taker, taking into account the proposal in question and the local context⁶. For the purposes of this plan, 'major development' will not be restricted to the definition of major development in the Town and County Planning (Development Management Procedure)(England) Order 2015 or to proposals that raise issues of national significance, and will include consideration of whether a proposal has the potential to have a serious adverse impact on the AONB.
4. *Add locally specific paragraph on AONB extent and special qualities and characteristics within each district. For example, for South Oxfordshire: The Chilterns Hills and the North Wessex Downs are part of a broad belt of chalk upland running across England in an arc from Dorset to Yorkshire. The Goring Gap, where the River Thames carves through the chalk escarpment, forms the boundary between the two AONBs in South Oxfordshire. Although both areas are chalk upland, their character differs: the Chilterns AONB is a generally more enclosed and wooded landscape than the broader more open uplands of the North Wessex Downs. The Chilterns escarpment in South Oxfordshire is particularly impressive, and the beech woods are justifiably famous.*
5. In determining compliance with criterion a, actions to conserve and enhance the AONB shall be informed by landscape assessment, having considered any relevant landscape character assessments and landscape and visual impact assessments and shall focus upon:

² [NPPF paragraph 115](#) "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."

³ [Countryside and Rights of Way Act 2000 Section 85](#)

⁴ See the Government's [Planning Practice Guidance 8-004-20140306](#) Paragraph 004 (PLUS add date of endorsement for LPAs which have taken through Cabinets)

⁵ [NPPF paragraph 176](#) "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

⁶ [Planning Practice Guidance 8-004-20140306](#) Paragraph 005

- i. the Chilterns AONB's special qualities which include the steep chalk escarpment with areas of flower-rich downland, broadleaved woodlands (especially beech), commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures;
 - ii. the scope for enhancing and restoring those parts of the landscape which are previously developed, degraded or subject to existing intrusive developments, utilities or infrastructure;
 - iii. locally distinctive patterns and species composition of natural features such as chalk downland, trees, hedgerows, woodland, field boundaries, rivers and chalk streams;
 - iv. the locally distinctive character of settlements and their landscape settings, including the transition between man-made and natural landscapes at the edge of settlements;
 - v. visually sensitive skylines, geological and topographical features;
 - vi. landscapes of cultural, historic and heritage value;
 - vii. important views and visual amenity, including key views from the steep north-west facing chalk escarpment overlooking the low clay vale, and foreground views back to the AONB; and
 - viii. Tranquility, dark skies and remoteness and the need to avoid intrusion from light pollution, noise, and motion.
6. Development proposals which lie outside the AONB but within its setting can also have impacts on it. The Council's duty of regard applies to development outside but which would affect land in an AONB⁷. For example, views out of the AONB from key visitor viewpoints into surrounding areas can be very significant. Although it does not have a defined geographical boundary, the setting of the Chilterns AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB. Advice on development in the setting of the AONB is contained within guidance produced by the Chilterns Conservation Board⁸.

Planning Histories referred to

Highlands Farm near Henley-on-Thames. P16/S0077/O Outline planning permission (all matters reserved except for access) for the phased development of the demolition of existing buildings and construction of up to 170 dwellings along with up to 2,000 m² B1 employment space, a Community Hub, public open space, sustainable urban drainage, earthworks, structural planting, substations and associated infrastructure.

⁷ [Countryside and Rights of Way Act 2000 Section 85](#) : in relation to, or so as to affect, land in an area of outstanding natural beauty"

⁸ Chilterns Conservation Board [Position Statement on Development affecting the setting of the Chilterns AONB](#)



Plan A: Chilterns AONB Boundary - Dark Blue Line



Plan B Neighbourhood Plan Boundary (red) and AONB Boundary (blue) with Highlands Farm (pink)

Appendix 1: About Us



The Chilterns Area of Outstanding Natural Beauty

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

Chilterns Conservation Board

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

List of Organisations providing Nominees to the Chilterns AONB Conservation Board

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Buckinghamshire Council (formerly Aylesbury Vale, Chiltern, South Buckinghamshire, and Wycombe District Councils)
- Dacorum BC, North Hertfordshire DC, South Oxfordshire DC, Three Rivers BC.
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and DEFRA (8 in total).

REGULATION 14 CONSULTATION HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

NOVEMBER 2021

Appendix F: REPRESENTATION FROM CREST NICHOLSON

16 November 2021

Ms Jodie Rhymes
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Dear Ms Rhymes,

THE DRAFT JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN PRE-SUBMISSION NEIGHBOURHOOD PLAN (REGULATION 14)

BY CREST NICHOLSON CHILTERN

This letter sets out the formal response of Crest Nicholson ('Crest') to a consultation on the pre-submission draft (Regulation 14) Joint Henley and Harpsden Neighbourhood Plan (JHHNP) (2020-2035).

Crest is promoting the Northern Field at Highlands Farm (Site M1) which is included in the pre-submission neighbourhood plan as an allocation to deliver circa 110 residential units, one hectare (ha) of employment land, open space, the relocation of the Chiltern Centre and provision of community-led housing (Policy DS7).

Crest is writing in support of the emerging Neighbourhood Plan and the allocation of Site M1 for a residential-led mixed-use development under Policy DS7. Site M1 is available, deliverable and developable and can commence within the first five years of the Neighbourhood Plan.

About Crest Nicholson

Crest Nicholson is firmly established as a leading developer with a passion for not just building homes for over 55 years but creating vibrant sustainable communities, built upon key placemaking principles.

Crest has worked constructively with Henley Town Council, Harpsden Parish Council and the local community to bring forward new homes on the former site at Highlands Farm. Highlands Park is sustainably delivering 191 high quality new homes with 40% affordable housing, as well as the provision of community facilities, sports pitches, open space, and employment opportunities on site.

Benefits of Site M1 – Northern Field at Highlands Farm

Sustainable Mixed-Use Community

The Northern Field at Highlands Farm (Site M1) has the critical mass to support and deliver a sustainable, genuine and mixed-use community along with employment and community space. The Site M1 has the capacity to deliver a significant proportion of the housing required under Policy H3 of the South Oxfordshire Local Plan 2035, including the delivery of community-led housing to meet the need in the Neighbourhood Plan Area.

Site M1 will provide a new home for the Chiltern Centre along with new employment and community facilities for the local area.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Housing Need and Affordable Housing

The Housing Needs Assessment (HMA, 2020) suggests that the overall housing target for Henley and Harpsden is 1,285 additional dwellings, of which 1,129 have already been allocated through existing commitments. Additionally, when planning for new development in Harpsden and Henley, the focus should be on boosting the number of mid-size homes.

It is evident that there is considerable need for affordable homes across Henley and Harpsden (HMA, 2020), with Policy H3 of the Local Plan stating market towns should seek to meet this need, even where this would result in housing provision in excess of the requirement. Site M1 will deliver policy-compliant 40% affordable housing which, combined with the 40% affordable housing already being delivered by Crest at Highlands Park, will make a significant contribution to meeting the need in the local community. Crest will provide a range of house types and tenures to meet the needs of the local market in line with the HMA. From experience of sales at Highlands Park, there is a significant demand for mid-size homes in the local area and Crest would be happy to cater to that local need. This means that the Northern Phase will further Highlands Park's delivery of this vital strand of housing, continuing to address the acute local need like no other site can.

The Oxfordshire SHMA identified a need for 386 Affordable Housing units per annum in South Oxfordshire from 2013-2031. This figure is then pro-rated to Henley and Harpsden (at a rate of 9.1%, which is the percentage of the South Oxfordshire population who live in the Neighbourhood Plan Area) and equates to 35.1 affordable homes per annum.

An additional estimate undertaken in the HMA calculates that *“demand for affordable routes to home ownership from households who cannot afford to buy their own home but can afford to rent amounts to 53.3 households per annum over the Plan period. The total estimated Affordable Housing need over the Plan period 2020-2036 is therefore 527 (rounded) affordable rented homes and 800 affordable home ownership dwellings.”*

The HMA states that there has been significant under-delivery of affordable housing within Henley and Harpsden since 2011. The proposed quantum of housing at Site M1 will help to meet the unmet demand of affordable housing.

The emerging Neighbourhood Plan states that affordable housing will largely be met through the 40% policy requirement set for sites of 10 or more dwellings. It is estimated in the HMA that 514 affordable dwellings will be delivered during the Neighbourhood Plan period, assuming all sites over 10 units will deliver policy compliant affordable housing. However, it is not clear whether this takes account of smaller infill sites coming forward which will deliver 0% affordable housing.

The benefit of this site coming forward, would be that it could deliver the quantum of development required to provide a greater number of affordable housing required for the Neighbourhood Plan Area, rather than a number of smaller sites, with the potential to deliver around 44 much needed affordable homes in a sustainable location, on existing bus routes and pedestrian and cycle links available. As set out in the HMA, however, this will not satisfy the potential total need in the local community of 1,327 affordable homes.

In order to meet the affordable housing need in the Neighbourhood Plan area, the quantum of housing to be allocated in the Neighbourhood Plan would need to be significantly increased. South Oxfordshire District Council Local Plan Policy H3 states that at least 1,285 homes will need to be delivered in Henley-on-Thames.

Alternatively, the community may wish to boost the supply of affordable housing in other ways. As stated in the HMA, alternative routes include using community development orders, identifying exception sites or developing community land trusts.

In addition to the affordable housing provision set out above, Crest is also happy to cater for the provision of community-led housing under the Community Land Trust and has identified land within the illustrative

masterplan for Site M1, further meeting the needs of the local market by providing truly affordable homes for local residents.

Landscape-Led Masterplan

The proposals will be set within a landscape-led masterplan, with a proposed community orchard and growing garden, new and retained hedgerows, areas of fully accessible open space, landscape enhancements, and woodland walks and wildlife corridors linking into the Site of Special Scientific Interest (SSSI) to the south of the site.

The publicly accessible open space proposed will be fully integrated with adjacent open space areas including at Highlands Park and the Town Green. Landscape enhancements will include the potential for fruit trees planting. The site will deliver biodiversity net gain in line with Policy ENV3 of the South Oxfordshire Local Plan.

Accessibility

Site M1 is in an accessible location to the town centre by walking, cycling and public transport, and will include appropriate on and/or off-street car parking provision. Site M1 will deliver improved footpath and cycle connections, including a heritage trail, linking the site to Henley and the wider area.

Crest is proposing further improvements to footways along Greys Road and will seek to manage to speed limit. There is also opportunity for further crossings on Greys Road.

Employment generation

In addition to the housing provided, Site M1 will deliver flexible employment and community space. The employment floorspace will have its own separate access and the buildings will be designed to be in keeping with the surrounding character. The vision is to provide flexible employment and community uses that can be utilised by small scale local occupiers which can be benefited by the local community.

Environment and Sustainability

Crest's vision is to create a highly sustainable and environmentally conscious development that will help South Oxfordshire District Council achieve its goal of carbon neutrality by 2030. The proposals will include opportunities for:

- Electric vehicle charging points in line with emerging Policy T4
- Solar panels
- Tree planting
- On-site commercial and leisure spaces promoting self-sustainability
- Contributions towards improving bus service
- Improved pedestrian/cycle links
- Biodiversity net gain and interconnected wildlife corridors
- Car club provision

Overall, Site M1 (Northern Field) will meet current and future housing need and has the critical mass to support a genuine mixed-use community in an accessible location, close to Henley. This includes the delivery of much-needed affordable housing. Crest is also willing to cater for and work with a Community Land Trust.

There is an opportunity to create a new home for small businesses, community groups and the Chiltern Centre with new, high-quality facilities. The proposed masterplan is landscape-led with opportunities for biodiversity enhancement, wildlife corridors, areas of fully accessible open space and an orchard and growing garden for the local community. The vision is to create a highly sustainable and environmentally conscious development that will benefit the local community long into the future. As demonstrated through our many years of working



together, our proposals for the Northern Phase remain flexible and subject to ongoing joint working with the councils, JHHNP Committee and community.

Should you have any queries please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Peter Warren".

Peter Warren
Savills Planning

Enc.

Northern Phase Highlands Park Brochure, November 2021

REGULATION 14 CONSULTATION HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN

NOVEMBER 2021

Appendix G: REPRESENTATIONS REGARDING LOCAL GREEN SPACE NOMINATIONS AT CORNER OF HARPSDEN ROAD AND SHEEPCOTE LANE AND HARPSDEN COURT



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Dear Sir/Madam

**Response to the Joint Henley and Harpsden Neighbourhood Plan
Objection to Proposed Local Green Space Nominations at Corner of Harpsden Road and Sheepcote Lane and Harpsden Court**

I write on behalf of my client, Mr Wason, who controls the land at corner of Harpsden Road and Sheepcote Lane and the land at Harpsden Court. These are referenced as nominated green spaces 21 and 35 respectively in the Joint Henley and Harpsden Neighbourhood Plan.

My client has received a letter from Henley-on-Thames Town Council dated 18th October 2021 notifying them that the Neighbourhood Plan Committee has nominated the above areas of land as 'Local Green Spaces'. The letter invites a response to this notification through the online consultation, the deadline for comments as part of this consultation has been extended to midday on 16th November 2021. This letter provides a response to the proposed designations in accordance with the current consultation. It has been submitted via the online consultation survey and to the above email address as we thought it would be useful for the reader to see it in letter form.

This letter first describes the sites, before considering the planning policy context in relation to the designation of 'Local Green Spaces' and provides a summary of the reasons why my client strongly objects to the nominations.

The sites

Corner of Harpsden Road and Sheepcote Lane

This site is approximately 2.13 acres (0.87 ha) of privately owned woodland, which currently comprises sycamores and two oak trees. The lawful use of this land is agricultural and no planning permissions have been granted for other uses on the site. The site is enclosed by fencing to the south and there are no public rights of way across or within the site. Harpsden Way adjoins the site to the east and south creating a physical barrier between the site and the agricultural land to the east.

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Figure 1: Approximate Location of Site 21 – Corner of Harpsden Road and Sheepcote Lane

Harpsden Court

This site comprises a total of approximately 1.58 acres (0.64 ha) of privately owned land, which has been used for ancillary purposes to Harpsden Court since it was built and has primarily been used as a working garden area. Harpsden Court is a Grade II* listed building within 20m of the site and therefore the site is in the setting of the listed building. The site adjoins Harpsden Way to the north and an unnamed road to the east. There are no public rights of way within or adjoining the site and therefore this site is not publically accessible.



Figure 2: Approximate Location of Site 35 - Harpsden Court

Planning Policy Context

The Localism Act (2011) makes provision for Neighbourhood Planning, empowering local communities to develop a shared vision for their neighbourhood and deliver the sustainable development they need through planning policies relating to the development and use of land.

For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the national Planning Practice Guidance (PPG).

The basic conditions are:

- a) "Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)."

The requirements set out in the NPPF have now been supplemented by the Neighbourhood Plan section of the PPG and its allied sections on Viability, Housing Land Availability Assessment and Strategic Environmental Assessment. The provisions of the NPPF and the PPG are mandatory material considerations for the purposes of basic condition 8(2)(a).

The NPPF, in placing a presumption in favour of sustainable development at its heart, recognises at paragraph 13 that the *"application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."*

Paragraph 29 of the NPPF further makes it clear that Neighbourhood Plans should not undermine local strategic policies and states:

"Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies". Footnote 18 further clarifies that *"neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area."*

The PPG adds at paragraph 040 (Reference ID: 41-040-20160211) that *"...proportionate, robust evidence should support the choices made and the approach taken"* by a Neighbourhood Plan and in respect of their preparation, states that:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared." (Paragraph: 041 Reference ID: 41-041-20140306)



The PPG also advises that those responsible for a Neighbourhood Plan, i.e. the qualifying body, must demonstrate how the draft Neighbourhood Plan will contribute towards sustainable development, being underpinned by “*proportionate evidence....on how the draft neighbourhood plan or order guides development to sustainable solutions*” (paragraph 072 Reference ID: 41-072-20190509).

Paragraph 101 of the NPPF states that local communities through local and neighbourhood plans can “*...identify and protect green areas of particular importance to them*”.

The NPPF acknowledges that “*designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.*” (paragraph 101 of the NPPF).

With this in mind, the NPPF is explicit in recognising that Local Green Space designations should only be used where the green space is:

- a) “*in reasonably close proximity to the community it serves;*
- b) “*demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) “*local in character and is not an extensive tract of land*”. (paragraph 102 of the NPPF)

In order for an area to be designated as Local Green Space, it has to meet all the criteria for designation set by paragraph 102 of the NPPF. It is therefore essential that, when seeking to designate LGSs, planmakers clearly demonstrate, through compelling evidence, that the requirements for its designation are met in full. These being: it is reasonably located to the community it serves; it is demonstrably special to a local community and is of a particular local significance; it is local in character; and it is not an extensive tract of land.

As recognised also by the Examiner appointed to consider the draft Alrewas Neighbourhood Plan, *the “Local Green Space designation is an extremely important one. Having regard to the Framework, the development of Local Green Space, other than in very special circumstances, is ruled out. The Local Green Space designation affords protection consistent with policy for Green Belts. Effectively, Local Green Space, once designated, provide protection comparable to that for Green Belt land”* (Alrewas Neighbourhood Plan Examiner’s Report – August 2015).

A copy of the Examiner’s Report is attached at **Appendix 1**. For this reason, it is crucial that plan-makers include evidential and robust information to support their proposed LGS designations and clearly demonstrate that their application meets national planning policy requirements in full. To assist plan-makers further in this regard, the PPG provides the following advice:

- Paragraph: 007 Reference ID: 37-007-20140306: “Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making [Savills emphasis].”
- Paragraph: 009 Reference ID: 37-009-20140306: “Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city” [Savills emphasis].
- Paragraph: 011 Reference ID: 37-011-20140306: “Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space”. [Savills emphasis]

- Paragraph: 013 Reference ID: 37-013-20140306: “The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” [Savills emphasis].

Reasons for objection to the nomination

1. The proposed LGS designations on both of the sites do not meet the requirements of paragraph 102 of the NPPF in full.

Paragraph 102 confirms that LGS designations should be *“where the green space is demonstrably special to a local community and holds a particular local significance, recreational value (including as a playing field), tranquillity or richness of its wildlife”*. Each of the two sites are assessed in turn below with regards to the criteria set out in paragraph 102.

Corner of Harpsden Road and Sheepcote Lane

- This site is not accessible to the general public, being within private use and fenced off. On this basis, it cannot be said that the site is ‘demonstrably special’ to the local community.
- ‘Particular local significance’ – as explained above, the site is in private use so cannot be considered in local use, or locally significant, on this basis.
- ‘Recreational value’ – the site is not in recreational use by the general public. The baseline report (2020-2035) for the draft neighbourhood plan identifies that the site does not hold recreational value to the community.
- ‘Tranquillity’ – it cannot be said that this area of land, privately owned and adjoining Harpsden Way to the east and south provides for a sense of ‘tranquillity’. This is further evidenced in the baseline report which identifies that the site is not proposed for a LGS designation based upon its sense of tranquillity.
- ‘Richness of wildlife’ – ecologically important areas are afforded statutory designations set out in a tier system from internationally or European protected sites, national protected sites, locally protected sites to protected areas. None of these statutory designations are afforded to the site. Whilst the site is recognised as a priority habitat in the baseline report on account of the site comprising a deciduous woodland, there is no evidence to suggest that it is ‘rich in wildlife’.
- ‘Demonstrably special’ – the site is not in public use and is fenced off. It is therefore apparent that the site does not serve a community and for this reason, it cannot be said to be ‘demonstrably special’ to a local community. The inclusion of the site as a proposed LGS is therefore completely anomalous.

Harpsden Court

- This site is not used by the general public as it is privately owned. The baseline report references this and therefore it cannot be concluded that the site is ‘demonstrably special’ to the local community. Furthermore the baseline report incorrectly states that there are no statutory designations on this site however, it lies within the Chilterns AONB.
- ‘Particular local significance’ – as aforementioned the site is in private ownership and can therefore not be considered in local use or locally significant as a result.
- ‘Recreational value’ – as identified in the baseline report the site does not have recreational value on account of it not being in recreational use by the general public.
- ‘Tranquillity’ – the site is used privately, adjoins Harpsden Way and there are residential properties to the east hence, it cannot be considered that this site provides a sense of tranquillity. This is also further evidenced in the baseline report which does not consider the site to offer a sense of tranquillity.
- ‘Richness of wildlife’ – as mentioned above ecologically important areas are afforded statutory designations set out in a tier system from internationally or European protected sites, national protected sites, locally protected sites to protected areas. None of these statutory designations are afforded to the site. Whilst this site is also recognised as a priority habitat in the baseline report on

account of the site comprising a deciduous woodland, there is again no evidence to suggest that it is 'rich in wildlife'.

- f) 'Demonstrably special' – the site is not in public use, and therefore it does not serve the local community. As such it cannot be considered that the site is 'demonstrably special' to the local community and hence the proposed LGS designation is inconsistent with national policy as set out above.

The legislation for designating LGS's as set out in paragraph 102 of the NPPF requires all of the criteria to be satisfied. In particular, it needs to be demonstrated that any sites nominated are special to the local community. In the baseline report for the Joint Henley and Harpsden Neighbourhood Plan it references that neither of the sites (21 and 35) are special to the local community with regards to their historic, recreational or tranquil values. The report considers that both sites are special to the local community solely based on their ecological value. However, neither site is statutorily designated for ecological reasons and it has not been demonstrated that there is a richness of wildlife on the site that affords a LGS designation. Whilst it is recognised that the sites comprise priority habitats this in itself does not evidence that there is an abundance of wildlife which warrants a LGS designation. Therefore, the nominations of sites 21 and 35 do not meet the legislative tests as set out in paragraph 102 of the NPPF.

If the Neighbourhood Plan proceeds and does not meet the necessary legislative and policy tests, it will be open for a legal challenge and will not be successful at examination.

My client therefore STRONGLY OBJECTS to the nomination and I would strongly recommend that the proposed LGS designations on these sites are not taken forward.

Yours sincerely



**Alison
Murrell**
BSc
Graduate
Planner
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APPENDIX 1

ALREWAS NEIGHBOURHOOD PLAN

Alrewas Neighbourhood Plan Examination,
A Report to Lichfield District Council

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

Nigel McGurk

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August 2015



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1. Introduction

The Neighbourhood Plan

This Report provides the findings of the examination into the Alrewas Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.” (Paragraph 183, National Planning Policy Framework)

Alrewas Parish Council is the *qualifying body*¹ responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).

This Examiner’s Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by Lichfield District Council. The Neighbourhood Plan would then be used to determine planning applications and guide planning decisions in the Alrewas Neighbourhood Area.

Role of the Independent Examiner

I was appointed by Lichfield District Council, with the consent of Alrewas Parish Council, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience. I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;

¹The qualifying body is responsible for the production of the Plan.

- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Alrewas Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The fourth paragraph of page 3 of the Neighbourhood Plan states that the Plan will cover a 16 year period, from 2014 to 2030. This period is also referred to on page 1 of the Basic Conditions Statement. I consider that it would also be helpful to state the plan period on the title page of the Neighbourhood Plan. I recommend:

- **Neighbourhood Plan title page, replace “February 2015” with “2014-2030”
I also note the reference to “February 2015” at the top of each page
and for clarity, recommend deleting this**

Taking the above into account, I confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to Lichfield District Council that I was satisfied that the Alrewas Neighbourhood Plan could be examined without the need for a Public Hearing.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*² following the Localism Act 2011. In order to meet the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the basic conditions above.

I note that whilst page 5 of the Neighbourhood Plan sets out the basic conditions, it also includes, in large bold print, the statement “*The Plan must comply with Local and National policies.*” This is not the case and the statement does not reflect the basic conditions. I recommend:

- **Page 5, delete the statement “The Plan must comply with Local and National policies.”**

I note that the wording of the basic conditions is the result of careful consideration. Paraphrasing the basic conditions, can often result in their misapplication, as has occurred in this case.

² Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

European Convention on Human Rights (ECHR) Obligations

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

European Union (EU) Obligations

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal³. However, it is good practice to assess neighbourhood plan proposals to determine whether or not the plan is likely to have significant environmental effects. This process is referred to as a "screening assessment." If the screening assessment identifies likely significant effects, then an environmental report must be prepared.

Page 13 of the Neighbourhood Plan states that "*The Steering Group were advised by LDC that a further SEA was not required as the Neighbourhood Plan does not allocate sites.*" This is also referred to on Page 5 of the Basic Conditions Statement.

However, I find that the above statement does not quite reflect the conclusions of the screening report carried out by Lichfield District Council. Lichfield District Council carried out screening assessments to establish whether or not the contents of the Neighbourhood Plan required a Strategic Environmental Assessment and/or a Habitats Regulations Assessment (HRA). A HRA is required if the implementation of the Neighbourhood Plan may lead to likely negative significant effects on protected European sites.

With regards SEA, the screening report concluded that "*the plan in its current form is likely to have significant environmental effects and therefore SEA will be required.*" The HRA screening report concluded that "*there are potential significant effects on the Cannock Chase Special Area of Conservation (SAC) and as such, the next stage of Appropriate Assessment will be required.*"

Given the evidence above, it is a significant concern that the Neighbourhood Plan suggests that Lichfield District Council was satisfied that "*an SEA was not required*" as this was not in fact the case. This is a major concern for the following reason.

If it is clear that an SEA and/or HRA was required, but has not been undertaken, it would be appropriate to recommend that the Neighbourhood Plan does not proceed to Referendum. It would effectively fail examination.

Taking the above into account, I have considered the screening assessments, the responses of the statutory bodies and all of the other information before me in some

³ Paragraph 026, Planning Practice Guidance 2014.

considerable detail, to establish whether or not the Neighbourhood Plan is compatible with European Union obligations.

With regards the need for a Habitats Regulations Assessment (HRA), the Neighbourhood Area falls within the Cannock Chase SAC and is also in close proximity to the River Mease SAC. Taking this into account, Natural England advised Lichfield District Council that, subject to the Lichfield Local Plan being adopted and “*provided the Neighbourhood Plan does not propose any additional development over and above that contained within the Local Plan,*” then the Neighbourhood Plan can rely on the HRA of the Lichfield Local Plan.

The Lichfield Local Plan was adopted in February 2015. I consider the development Policies of the Neighbourhood Plan later in this Report and recommend a significant number of changes. Taking these recommendations as well as the above into account, I am satisfied that it is appropriate for the Neighbourhood Plan to rely on the HRA of the Lichfield Local Plan, as per Natural England’s advice.

With regards Strategic Environmental Assessment (SEA), Lichfield District Council is concerned that, by seeking to restrict the growth of the Neighbourhood Area to 90 dwellings, the Neighbourhood Plan “*will pre-determine a more strategic issue.*” It will “*have environmental effects and as such SEA is required.*” Effectively, Lichfield District Council is concerned that any undue limiting of development within the Neighbourhood Area would have knock-on impacts, leading to significant environmental effects in other areas.

I note that the Lichfield Local Plan does not seek to restrict housing growth in the Neighbourhood Area to 90 dwellings, but provides for between 90–180 dwellings. Importantly, this is the basis upon which the Lichfield Local Plan HRA was carried out. I consider housing growth in more detail under “Housing Development” below, and again, I recommend a significant number of changes. I consider that these changes appropriately address Lichfield District Council’s concerns with regards the Neighbourhood Plan’s restrictive approach to housing growth.

Also, with regards to SEA, English Heritage (now, in relation to planning matters, Historic England) suggests that “*on the basis of probability*” SEA is likely to be required. However, I am concerned that this “*basis of probability*” is simply founded on nothing more than the statement “*the historic environment evidence base for the Plan is very weak.*” No substantive evidence or detail has been provided to demonstrate why, in Historic England’s view, the Neighbourhood Plan is “very weak.”

Whilst I note that there is no legislative requirement for neighbourhood plans to include historic environment policies and that, together, national and local policies already provide for the protection of the nation’s heritage assets, it is relevant to point out that Historic England has subsequently stated that the body “*has no adverse comments to make upon the draft plan which we feel has now taken a*

suitably proportionate approach to the main historic environment issues pertaining to Alrewas.”

Taking all of the above, and my recommended modifications later in this Report, into account, I consider it reasonable to conclude that the Neighbourhood Plan does not require a Strategic Environmental Assessment.

In considering European obligations, I am also mindful that national guidance establishes that the ultimate responsibility of determining whether a draft neighbourhood plan meets EU obligations is placed on the local authority,

“the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.” (Planning Practice Guidance 11--031)

Consequently, whilst I can make recommendations, it is ultimately up to Lichfield District Council to determine compatibility with EU regulations. In this regard, I note that in paragraph 5.5 of the SEA and HRA Screening Report (July 2014), Lichfield District Council state *“It may be possible to modify the (Neighbourhood Plan) to avoid the significant effects identified through this screening report for both SEA and HRA.”*

Taking all of the above, and my recommendations below, into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations.



3. Background Documents and Alrewas Neighbourhood Area

Background Documents

In undertaking this examination, I have considered various information in addition to the Alrewas Neighbourhood Plan. This has included:

- National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- Lichfield Local Plan (2015)
- Basic Conditions Statement
- Consultation Statement
- Neighbourhood Plan Appendices
- Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment Screening Report (July 2014)

Also:

- Representations received during the publicity period

In addition, I spent an unaccompanied day visiting the Alrewas Neighbourhood Area.

Alrewas Neighbourhood Area

Further to an application made by Alrewas Parish Council, Lichfield District Council states that Alrewas was designated as a Neighbourhood Area on 19 February 2013.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

There is a plan showing the Parish boundary on the last page of the Basic Conditions Statement. Whilst there are also plans in the Neighbourhood Plan itself that show the Parish boundary, it would be helpful if it was made clear that the Neighbourhood Area coincides with that of Alrewas Parish. I recommend:

- **Neighbourhood Plan page 14, second paragraph, replace first sentence with “*Alrewas was designated as a Neighbourhood Area in February 2013. The boundary of the Neighbourhood Area coincides with that of Alrewas Parish.*”**

4. Public Consultation

Introduction

As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

Alrewas Neighbourhood Plan Consultation

Alrewas Parish Council submitted a Consultation Statement to Lichfield District Council. Further to consideration, I can confirm that this sets out who was consulted and how, together with the outcome of the consultation and that as such, the Consultation Statement meets the requirements of the neighbourhood planning *regulations*⁴.

Taking into account all of the evidence provided, I am satisfied that the production of the Neighbourhood Plan was supported by robust public consultation. It is clear that the views of the wider community were actively sought and taken into account. It is also clear that Alrewas Parish Council undertook public consultation above and beyond that required by legislation.

Following the decision to produce a Neighbourhood Plan, a Neighbourhood Plan Steering Group of volunteers was formed. Early in 2013, two separate public meetings, attended by a total of more than 130 people, were held to introduce neighbourhood planning and launch the Alrewas Neighbourhood Plan. Five focus groups were established to cover each of the key areas considered by the Neighbourhood Plan.

The Steering Group and focus groups met frequently and regular updates were presented at public meetings. A questionnaire was hand-delivered to households in late 2013, followed by a business questionnaire, sent out to 51 businesses in the Neighbourhood Area in early 2014. The household survey had a relatively high, 38%, response rate and the results of the questionnaires helped influence the emerging policies.

A wide ranging approach to information gathering during 2013 and 2014 included the establishment of a Youth Forum, meetings with landowners and developers and

⁴Neighbourhood Planning (General) Regulations 2012.

meetings with other Qualifying Bodies progressing neighbourhood plans in the wider area.

Consultation was widely communicated and well-publicised via a dedicated Neighbourhood Plan website, the Parish Council website, advertisements in the local press, the parish magazine, Facebook and by the dissemination of draft documents around the Neighbourhood Area.

Taking all of the above into account, the Consultation Statement presents an audit trail to demonstrate that consultation was wide-ranging, comprehensive and transparent. Comments were pro-actively sought and those received were duly considered. There is evidence to demonstrate that the Neighbourhood Plan reflects the views of local people. People and organisations were not just provided with a fair chance to have their say, but were actively encouraged to engage in shaping the Neighbourhood Plan.

I am satisfied that the consultation process was robust. It is reflective of the significant efforts made by volunteers from within the local community to deliver a Neighbourhood Plan for Alrewas.

5. The Neighbourhood Plan – Introductory Section

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

The policies of the Neighbourhood Plan are considered against the basic conditions in Chapter 6 of this Examiner's Report, below. I have also considered the Introductory Section of the Neighbourhood Plan and make recommendations below which are aimed at making it a clear and user-friendly document.

The Contents page is succinct and is clearly set out alongside attractive photographs.

The third paragraph on page 3 states that the Neighbourhood Plan reviews sites and suggests that background appendices should comprise material planning considerations. This is not the case. I recommend:

- **Page 3, para 3, delete from “Additionally...” until the end of the para**

The Lichfield Local Plan was adopted in February 2015. The Neighbourhood Plan should not refer to it as an emerging document and there is no need for the inclusion of references to the saved policies of the 1998 Local Plan. Also, the Lichfield Local Plan runs from 2008 to 2029. The plan period is different to that of the Neighbourhood Plan. I recommend

- **Page 3, para 4, end first sentence at “...as fully as possible.”**
- **Delete the rest of the paragraph and replace with “*The Neighbourhood Plan is in general conformity with the strategic policies of the Lichfield Local Plan (2015). The Neighbourhood Plan covers a sixteen year period, from 2014 to 2030.*”**

The Neighbourhood Plan must have regard to national policy. In this respect, it is inappropriate to state that it only embraces three paragraphs of the Framework. I recommend:

- **Page 3, last para, delete “...2012 (paragraph 10, 16 and 184),”**

Given the status of the Lichfield Local Plan, I recommend:

- **Page 4, last para, replace penultimate sentence “Lichfield...adopted” with “*As above, the Lichfield Local Plan was adopted in 2015.*”**

The Appendices do not form part of the Neighbourhood Plan, they comprise background information. There is no substantive evidence to support the contention

that the evidence base is “*a material consideration in any development planning decisions.*” I recommend:

- **Page 5, first para, delete from “A full...” to the end of the para**
- **Page 6, first line, delete “emerging”**

The fourth paragraph on page 6 is repetitive and confusing, and the subsequent paragraphs have been overtaken by events. The “*What is in the Plan*” section fails to reflect the recommended modifications in this Report and is unnecessary, given that there is a Contents page. I recommend:

- **Page 6, delete paras 4, 5 and 6**
- **Delete “What is in the Plan ?” heading and bullet points**

The Local Context and History section is interesting and distinctive to Alrewas. It is greatly enhanced by the presence of relevant, interesting photographs.

Figure 1 includes various boundaries. These lack detail and/or Policy support. As there is no specific Neighbourhood Area figure or plan in the Neighbourhood Plan, I recommend:

- **Figure 1, delete titles and replace with “*Alrewas Neighbourhood Area*”**
- **Delete all boundaries and titles on the plan, other than the Neighbourhood Area boundary**

The Planning Framework section starts to repeat information already provided on page 5, but in so doing, paraphrases the basic conditions such that the information provided is wrong. I recommend:

- **Page 13 second para, delete from “Whilst this Plan...” to end of para**
- **Page 13, delete paras 3, 4 and 5**
- **Page 13, delete text in italics/bold to the right hand side of the page**

A Consultation Statement was submitted alongside the Neighbourhood Plan. It is unnecessary for the Neighbourhood Plan to repeat large chunks of the Consultation Statement in the Neighbourhood Plan. This approach leads to an imbalance, affording insufficient emphasis to the most important part of the Neighbourhood Plan – its Policies, in favour of repeating background information. I recommend:

- **Delete pages 14, 15 and 16, with the exception of the modification proposed above (page 10 of this Report) and the text in italics/bold, to the right hand side of each page.**

- **Add new paragraph “*Consultation has been fundamental to the preparation of this Neighbourhood Plan. A Consultation Statement was prepared and submitted alongside the Neighbourhood Plan, in line with legislation. This sets out, in detail, the consultation undertaken.*”**
- **Change title of this section from “Consultation Statement” to “*Consultation*”**

6. The Neighbourhood Plan – Neighbourhood Plan Policies

As noted above, the Policies form the most important part of the Neighbourhood Plan. It would be helpful to make it clear when the background information ends and the Policy section begins. I recommend:

- **Top of Page 17, new title, “Alrewas Neighbourhood Plan – Policies” I recommend that this title be set within a blue box or similar illustrative device, making it clear that this is the beginning of the Policy Section.**

Within each Policy section there is reference to “*supporting*” documents. Whilst this might have provided some helpful information during the preparation of the Neighbourhood Plan, its inclusion appears confusing and unnecessary. For example, there is no need to refer to some parts of national policy and not others; the status of the Lichfield Local Plan has changed; and other documents may have little planning status. I recommend:

- **In each Policy section, delete the heading “The following plans, documents and strategies support the...” along with all of the bullet points that follow.**

The references to some paragraphs of the Framework stated after every Policy are neither comprehensive nor necessary, and detract attention from the Policies themselves. I recommend:

- **Delete references to paragraphs of the Framework after every Policy**

Community Facilities

- **Page 17, para 2, change first sentence to “...Settlement” in the *Lichfield Local Plan*, supporting...”**

Policy Section 1: Community Facilities

Whilst, essentially, Policy 1.1 seeks to protect community facilities, it is vague as to what these comprise. No definition is provided and the first paragraph of the supporting text refers to a wide range of services, businesses and facilities. There is no indication of how “*any development*” might make a “*positive contribution*” to community facilities. Consequently, the Policy fails to provide decision makers with a clear indication of how to react to a development proposal, as required by paragraph 154 of the Framework.

However, national policy promotes healthy communities (Chapter 8) and by seeking to protect facilities recognised as being important to the local community, Policy 1.1 has regard to this. I consider that, subject to the recommendations below, the Policy can be modified to contribute to the achievement of sustainable development and meet the basic conditions:

- **Policy 1.1, change opening sentence to “*Development that results in the loss of, or has a significant adverse effect on, the following village facilities and services will not be supported, unless it can be demonstrated, further to a period of marketing, that the existing use is no longer viable: local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. New development should not prevent...open spaces.*”**

Policy 1.2 concerns matters not within the control of the Neighbourhood Plan and seeks to place a requirement on another public body. I recommend:

- **Delete Policy 1.2**

Policy 1.3 requires all development to provide “*street furniture*” to keep the streets clear of animal faeces and litter. This is an onerous requirement that may not be relevant for most development. In addition, public highways are the responsibility of another body and are not under the control of the Neighbourhood Plan. I recommend:

- **Delete Policy 1.3**

Policy 1.4 lacks clarity. There is no definition of what an “*unnecessary loss*” might comprise, who would be responsible for determining this, or on what basis. As such, the Policy does not provide appropriate clarity. Furthermore, in seeking to protect community facilities and services, the Policy is simply repeating the aims of Policy

1.1. I recommend:

- **Delete Policy 1.4**

Policy Section 2: Traffic and Transport

Policy 2.1 requires all development to “*identify the realistic level of traffic they will generate.*” This is an onerous requirement that is unlikely to be appropriate for the majority of development proposals – for example, household extensions. The Policy goes on to require traffic impact statements or assessments to be subject to Parish Council approval. However, the Parish Council does not possess a statutory responsibility in this regard, unlike the highways authority and the local planning authority. I note that there is no substantive evidence to demonstrate that the Parish Council possesses the relevant expertise to assess a traffic assessment. I also note that, where appropriate, it is already a requirement for traffic impact assessments to be submitted with planning applications. I recommend:

- **Delete Policy 2.1**

As worded, Policy 2.2 would support any “*project*” that would enable a safe pedestrian and cycle crossing over the A38 to the east of the village. This is a very open Policy and would, for example, support a new nuclear power station or 10,000 homes, if the “*project*” included a safe new crossing.

However, notwithstanding the above, the intention of the Policy has regard to the Framework, which supports the enhancement of public rights of way (Para 75), requires development to provide safe and accessible environments (Para 58) and promotes sustainable modes of transport (Chapter 4). Subject to the proposed recommendations below, Policy 2.2 contributes to the achievement of sustainable development and meets the basic conditions:

- **Policy 2.2, change to “*The provision of a safe pedestrian and cycle access from the village centre across the A38 to the National Memorial Arboretum, the National Forest and the Central Rivers Initiative Area will be supported.*”**

Policy 2.3 sets out a community aspiration. This is more appropriately addressed as a “Community Action” and I recommend:

- **Delete Policy 2.3**
- **Retain all of the text, with the exception of “other” in line 4, and place below a new heading “*Community Action: Alrewas Railway Station and Railway Line*”**

- **Add new sentence after “...Local Plans. *The Parish Council will actively seek to work with other bodies to achieve the community aim of re-opening the Alrewas Railway Station and railway line.*”**

Policy 2.4 supports proposals that would “*lead to an improvement to public parking.*” There is no clarity as to what an “*improvement*” would comprise – for example, whether this relates to quality, quantity or to other factors. In addition, there is no substantive evidence to demonstrate that there are any deliverable opportunities for the provision of off-street public parking. I am also mindful that Lichfield Local Plan Policy ST2 refers to parking standards and there is nothing within Policy 2.4, or the supporting text, to demonstrate that the Policy is in general conformity with the Lichfield Local Plan in this regard.

Taking the above into consideration, I recommend:

- **Delete Policy 2.4**

Policy 2.5 is based around matters that require the approval of another body and as such, it is not appropriate for inclusion in the Neighbourhood Plan. I recommend:

- **Delete Policy 2.5**

Policy 2.6 is concerned with “*initiatives*” rather than land use planning matters. From consideration of the information before me, I understand that noise and pollution arising from local highways is a local concern. Given this, I recommend:

- **Delete Policy 2.6**
- **Create a new “*Community Action: Road Noise and Pollution*” with a new paragraph of text stating “*The Parish Council will seek to encourage opportunities to reduce noise and pollution arising from the A38 and A513. Where possible, the parish Council will work with other bodies to achieve this.*”**

Policy Section 3: Public Realm

The intent of Policy 3.1 is to protect and enhance the public realm and to improve footpaths and access points. Generally, this has regard to the Framework, which recognises the importance of high quality open spaces (Para 73) and supports the enhancement of public rights of way (Para 75).

However, the wording of Policy 3.1 is unclear. It states that the rural environment will be enhanced. There is no indication as to how this will, or can, be achieved and I am mindful that there is nothing in local or national planning policy that requires the rural environment to be enhanced. Consequently, this would introduce an onerous requirement without any certainty that it can even be achieved. Similarly, neither the Policy nor the supporting text sets out any mechanism to deliver the enhancement of publicly accessible open space and the canal side environment.

The Policy goes on to require “*any development*” to ensure that footpaths and access points are maintained or improved. This introduces an onerous requirement that may not relate to the majority of development proposals. Furthermore, the majority of development proposals may not have the ability to ensure the maintenance or improvement of footpaths.

Taking the above into account, I recommend:

- **Policy 3.1, change wording to “*The protection and enhancement of publicly accessible open space and the canal side environment, and the maintenance or improvement of public rights of way, will be supported.*”**

Policy 3.2 requires “*any development*” proposals to recognise the importance of the canal. This is a requirement that is unlikely to be relevant to the majority of development proposals and as such, it is an inappropriate requirement.

The Policy goes on to require that development that impacts on the canal “*physically or visually*” should fund tourist facilities, such as additional moorings, tourist information and boat facilities. There is no indication of what a physical or visual impact on the canal might comprise and there is no detailed information to demonstrate what the level of developer contributions might be. As such, the Policy provides insufficient clarity or detail to provide decision makers with a clear indication of how to react to a development proposal.

The Policy goes on to require consultation with a body external to the Parish Council. This introduces a factor beyond the control of the Neighbourhood Plan.

Taking all of the above into account, I recommend:

- **Delete Policy 3.2**

Policy 3.3 introduces a requirement to “*improve*” existing footpaths and access points where these are affected by development proposals. It is unclear as to why development proposals must “*improve*” rather than simply maintain rights of way and no clarity is provided as to what such improvements would comprise. It is not clear, for example, that every footpath in the area actually needs to be improved.

The Policy goes on to seek to promote disabled access, although the requirement for this to be “*ensured where reasonably possible*” is confusing.

Ultimately, I recognise that the Policy seeks to protect and enhance public rights of way and access, having regard to paragraph 75 of the Framework. Subject to the recommended changes below, I am satisfied that the Policy contributes to the achievement of sustainable development and meets the basic conditions:

- **Policy 3.3, change to “*Development must protect any public right of way and/or access point that it affects. Where possible, such development should seek to provide disabled access to the public right of way.*”**

Policy 3.4 is a confusing Policy that refers to the Parish Council providing guidance to a statutory body. It is unclear on what basis the Parish Council is in a position to do this. The Policy suggests that every development will have a consistent approach to public realm design, but provides no guidance as to what such an approach might comprise. It does not distinguish between types of development. It goes on to require all developments to limit the impact of light pollution on local amenity, dark landscapes and nature conservation. No information is provided as to how, or whether, all development can achieve this, or why this is necessary and desirable.

Taking all of the above into account, there is nothing to lead me to the conclusion that Policy 3.4 supports sustainable development. Rather, I consider that there is a risk that sustainable development may be prevented by the Policy. Furthermore, the Policy relates to matters outside the control of the Neighbourhood Plan. I recommend:

- **Delete Policy 3.4**

Policy 3.5 supports tree planting to enhance the character of the village. This has regard to the Framework and to the Lichfield Local Plan, which together amongst other things, seek to protect and where possible, enhance local character.

The final part of the Policy looks to impose a requirement for development to “*incorporate an appropriate level of planting.*” There is no indication as to what such

an appropriate level might comprise and consequently, this part of the Policy lacks the clarity required to provide decision makers with an indication of how to react to a development proposal.

Subject to the recommendation below, Policy 3.5 contributes to the achievement of sustainable development and meets the basic conditions:

- **Policy 3.5, delete second sentence**

Environment and Conservation Area

- **Page 30, delete fourth paragraph (Draft Local Plan)**

Policy Section 4: Environment and Consideration

Good design is recognised by the Framework as being integral to sustainable development and in general terms, Policy 4.1's requirement for high quality design has regard to this. However, there is no evidence to demonstrate that every development proposal can, or should, be consistent with the village character – it is not clear, for example, why this would be appropriate for development elsewhere in the Neighbourhood Area, outside the village. The Policy goes on to require that development ensures “*a positive contribution to the quality*” of the Conservation Area. Whilst it is not clear what a positive contribution to the quality of the Conservation Area would comprise, the greater concern is that Policy 4.1's approach to protecting heritage assets is different to that set out in Chapter 12 of the Framework.

National policy recognises that the country's heritage assets are irreplaceable and requires that they be conserved in a manner appropriate to their significance. Where a proposed development will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (Para 134, The Framework). The simplistic approach proposed by Policy 4.1 fails to have regard to the Framework.

Taking the above into account, I recommend:

- **Policy 4.1, change to read “*Within the village, development proposals should demonstrate that a high quality of design, form and layout, consistent with the village character, will be achieved.*”**

Policy 4.2 states that the significance of the Conservation Area and the Trent and Mersey Canal, among other things, “*will be recognised in all development proposals.*” The Conservation Area and the Canal will simply not be relevant to some development proposals and as such, this is an unreasonable requirement. Furthermore, it is unclear how development proposals can, or should, “*recognise*” these features – and why this would be relevant in land use planning terms.

The second part of Policy 4.2 again introduces an approach to heritage assets that fails to have regard to national policy, as set out in Chapter 12 of the Framework.

I recommend:

- **Delete Policy 4.2**

Policy 4.3 states that development must comply with the requirements of the Town and Country Planning Act. This is simply a fact and there is no need to repeat a legislative requirement in the form of a neighbourhood planning Policy.

- **Delete Policy 4.3**

Policy 4.4 requires any development in the Conservation Area, or adjacent to it, to avoid impacting on “*important rural views*.” There is no substantive information determining what the “*important rural views*” are that require protection and as such, this part of the Policy fails to provide decision makers with a clear indication of how to react to a development proposal.

The Policy then goes on to require that “*any development*” avoids “*impacting on the setting of buildings of historic interest*.” Again, this approach fails to have regard to national policy as it applies to heritage assets. I recommend:

- **Delete Policy 4.4**

Policy 4.5 requires all development proposals to demonstrate that they will not have a direct or indirect adverse effect on the Cannock Chase Special Area of Conservation (SAC). Were the Neighbourhood Plan to be made, it would form part of the Development Plan along with the Lichfield Local Plan. Policy NR7 of the Lichfield Local Plan already sets out the requirements contained in Policy 4.5. It is not the role of the Neighbourhood Plan to repeat existing policy. I recommend:

- **Delete Policy 4.5**

The Framework enables local communities to identify, for special protection, green areas of particular importance to them. It goes on to state that

“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.” (Para 76)

The Neighbourhood Plan identifies two areas of Local Green Space – one to the northern edge of the village and another to the west. During my site visit, I observed that both sites covered relatively large areas of land.

The Local Green Space designation is an extremely important one. Having regard to the Framework, the development of Local Green Space, other than in very special circumstances, is ruled out. The Local Green Space designation affords protection consistent with policy for Green Belts. Effectively, Local Green Space, once designated, provide protection comparable to that for Green Belt land.

The Framework is explicit in stating that

“The Local Green Space designation will not be appropriate for most green areas or open space.” (Para 77)

Taking this into account, it is essential that, when allocating Local Green Space, plan-- makers can clearly demonstrate that the requirements for its allocation are met in full. These requirements are set out in paragraph 77 of the Framework and require that: the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

With regards the latter point, I note above that both sites covered relatively large areas of land, especially in relation to the overall size of Alrewas village. In the absence of any substantive evidence to the contrary, I consider that this introduces conflict with the requirement for Local Green Space not to comprise an extensive tract of land.

In addition to the above, no compelling evidence has been presented to demonstrate that each of the specific green areas are demonstrably special to the local community and that each specific green area holds a particular local significance. For land to be designated as Local Green Space, this *must* be demonstrated. The Neighbourhood Plan fails to do this. It does not have regard to national policy.

Consequently, I recommend:

- **Delete Policy 4.6 and associated plan**

Housing Development

I note that the Policy Section title does not correspond to the chapter title. I recommend:

- **change the title of the Policy Section to tie in with the chapter title, “*Policy Section 5: Housing Development*”**

Much of the supporting text to the Housing Development Policies refers to historic information that has, effectively, been overtaken by the adoption of the Lichfield Local Plan. Lichfield Local Plan Policy Alr4 states that 90–180 homes will be provided in Alrewas during the plan period. To reach its adopted form, the Lichfield Local Plan has undergone robust public consultation and rigorous examination.

I note that whilst the supporting text refers to the allocation of housing land, it does not allocate any housing sites. This should be made clear.

The supporting text suggests that The Rural Planning Project, which forms part of the evidence base, identifies housing growth of 73–88 homes, but that any higher allocation would require development on a site strongly opposed by the local community. However, I am mindful of Lichfield District Council’s comment that this does not represent the full findings of the report, which refers more generally to housing growth being delivered outside the village boundary subject to need.

The Lichfield Local Plan establishes that there is significant housing need within the District, with a minimum of 10,030 homes needing to be delivered between 2008 and 2029. Alrewas is a Key Rural Settlement and Lichfield Local Plan Policy Rural 1 states that expansion of village boundaries is required to accommodate growth.

Further to the above, the Framework requires development that is sustainable to go ahead without delay (Ministerial Foreword). It sets out an assumption in favour of sustainable development and to support this, the housing section of the Framework (Chapter 6: Delivering a wide choice of high quality homes) refers explicitly to the need to “*boost significantly the supply of housing...*” (Para 47). With specific regard to neighbourhood planning, national guidance is clear that “*Neighbourhood plans should not promote less development than set out in the Local Plan or undermine its strategic policies*” (Para 184).

As a Key Rural Settlement, Alrewas is one of the most sustainable rural settlements in the District. Its wide range of strategic services and facilities mean that it has strategic role. Alrewas’ housing requirement of 90–180 houses, as set out in the Lichfield Local Plan, is precisely that and it has been established to take account of the village’s strategic role.

The supporting text in the Neighbourhood Plan is, I find, worded in a negative manner, and appears to have the aim of limiting development in Alrewas to 90

homes. It is based around the findings of an Appendix, “*the Alrewas Neighbourhood Plan Housing Allocation.*” I have considered this 6 page document and I agree with Lichfield District Council’s comment that the information contained within it “*does not comprise compelling evidence to determine a fixed allocation of housing.*” For example, whilst focusing on the population of Alrewas and other villages, it fails to provide a detailed analysis of facilities, services, public transport and so on.

Together, the supporting text and Policy 5.2.1 “*establish*” an “*allocation*” of 90 dwellings for Alrewas. This is potentially just half of the village’s housing requirement, as established in the Lichfield Local Plan and as a consequence, I consider that the Neighbourhood Plan is not in general conformity with the strategic policies of the development plan. Furthermore, by effectively limiting development to, potentially, significantly less than that required, the Neighbourhood Plan seeks to prevent sustainable growth. It does not have regard to the Framework and does not contribute to the achievement of sustainable development.

I acknowledge that, during consultation, a large majority of residents “*felt*” that Alrewas could not accommodate more than 100 new homes. However, in my opinion, this is more reflective of the extremely common, and to some considerable degree, natural, response, to new development. There are times when we all appreciate the status quo and can be apprehensive about change. However, taking the above into account, I am not satisfied that *feeling* the Neighbourhood Area cannot accommodate more than 100 new homes is quite the same thing as it not being able to do so. In this regard, I am mindful that, the housing requirement of 90– 180 new homes, as established in the Lichfield Local Plan, is the result of extensive consultation and importantly, rigorous examination. Furthermore, I note above that the approach set out in the Neighbourhood Plan is not, itself, supported by substantive evidence.

Given the above, I am concerned that, whilst the Neighbourhood Plan does not actually allocate any sites, the supporting text and subsequently, Policy 5.2.5, effectively seek to prioritise areas for the expansion of the village. In so doing, Lichfield District Council points out that the Neighbourhood Plan’s approach conflicts with specific evidence that supports the Lichfield Local Plan.

Planning Practice Guidance recognises that it is possible for there to be some conflict between the policies of a neighbourhood plan and those of the relevant district-wide local plan, whilst still passing the general conformity test. In such circumstances, the degree of conflict and crucially, the weight of evidence are the key factors. In this regard, I am concerned that, as pointed out by Lichfield District Council, the Neighbourhood Plan “*directly contradicts technical evidence that supports the Local Plan*” but in so doing, fails to provide detailed, substantive counter-evidence that leads me to find that the conflict is justified.

Taking all of the above into account, with regards the supporting text to the Housing Development Section of the Neighbourhood Plan, I recommend:

- Page 38, delete paras 3 and 4
- Page 39, para 1, change to “*Whilst the Neighbourhood Plan could be used to allocate sites for development, it does not do so. Instead, it considers spatial and other relevant matters related to the provision of housing in the Neighbourhood Area.*”
- Page 39, delete para 3, 4, 5 and 6, and text in bold/italics in right hand margin
- Page 40, delete all text
- Page 41, delete all text, including the paragraph that extends to the top of page 42

Policy Section 5: Housing Development

Policy 5.1 states that “*new housing allocations will be provided.*” The Neighbourhood Plan does not allocate any land for residential development. As such, this Policy is very confusing. I note that subsequent policies support small-scale infill development and other types of development. I recommend:

- **Delete Policy 5.1**

I note that the numbering of the Policies in the Housing Development Section follows on from the above Policy. I recommend:

- **Change the numbering system to become consistent with the rest of the Policies in the Neighbourhood Plan, for example, 5.1, 5.2, 5.3 etc.**

Policy 5.1.1 states that infill developments will be prioritised. No indication is provided as to how this will, or can, be controlled and as such, the Policy is unclear. This lack of clarity is exacerbated by the Policy going on to state that brownfield sites will be prioritised. It is unclear how both infill development and brownfield sites will be prioritised at the same time – for example, which would take precedent and how would this be controlled ?

Further prioritisation is also afforded by the Policy to developments that include one and two bed homes. Whilst this adds to the overall confusion, I recognise that the local community supports the provision of smaller dwellings. However, I am mindful that the provision of smaller properties is addressed by Policy 5.4.2, which is not so restrictive as Policy 5.1.1 in that it does not only concern small infill sites. I take this into account in considering other Policies in this section. I recommend:

- **Policy 5.1.1, change to “*Small scale infill development and the development of brownfield land will be supported.*”**

Taking the above into account, the Policy contributes to the achievement of sustainable development and meets the basic conditions.

Policy 5.1.2 generally supports small-scale development in the hamlets of Overley and Orgreave. This has regard to the Framework, which recognises the need to locate new housing where it will enhance or maintain the vitality of rural communities (Para 55). The Policy goes on to support the redevelopment of any farm building. This could result in modern sheds being replaced by new housing and there is no substantive evidence to demonstrate that such an approach would not result in an inappropriate scale of development in rural areas. This approach would fail to have regard to national policy, which is explicit in stating the need to avoid new isolated homes in the countryside, unless special circumstances exist.

In the above regard, I note that national and local planning policy, along with permitted development rights, already provide significant scope and flexibility for the appropriate conversion of farm buildings. I recommend:

- **Policy 5.1.2 change to “*Small scale development will be supported within the hamlets of Overley and Orgreave.*” (delete rest of Policy)**

Policy 5.2 refers to the requirements of a Policy in the Lichfield Local Plan, that will apply to development proposals. The Neighbourhood Plan does not control the implementation of the Policies of the Lichfield Local Plan. There is no need for a neighbourhood plan policy to paraphrase existing planning policies and I note that this can lead to unnecessary confusion. I recommend:

- **Delete Policy 5.2**

Policy 5.2.1 seeks to limit new developments outside the existing settlement to no more than 30 dwellings. Lichfield District Council has raised the concern that sites identified in the Strategic Housing Land Availability Assessment do not have capacity to meet Alrewas’ housing requirement if only sites of no more than 30 houses are permitted to be delivered. There is no substantive evidence to demonstrate that the Alrewas’ housing requirement of 90-180 homes can be met if development is limited to sites of no more than 30 dwellings. Consequently, Policy 5.2.1 could prevent sustainable development from going ahead.

The Policy goes on to refer to “*the established allocation of 90 dwellings.*” I note above that the Neighbourhood Plan does not allocate any land for development. I also note that the approach to housing land set out in the Neighbourhood Plan does not meet the basic conditions.

Taking the above into account, I recommend:

- **Delete Policy 5.2.1**

For clarity, the recommendation above does not provide scope unlimited, or uncontrolled housing development in the Neighbourhood Area. As above, the Lichfield Local Plan sets out the housing land requirement for Alrewas.

Policy 5.2.2 requires housing development to be “*accessible to traffic*” without “*impacting on*” the village centre. This is a particularly onerous requirement. It is likely that people living in and around Alrewas would seek to use local services and facilities located in the village centre. Indeed, the sustainability of services and facilities is dependant on people using them. Consequently, it would seem to be inevitable that new housing development would result in some kind of impact on the village centre. This could be a positive impact.

Policy 5.2.2 provides no definition of what “*impacting on*” actually means. In the absence of detailed information, I am concerned that positive impacts, resulting in sustainable development, may be prevented. In this way, the Policy fails to have regard to national policy.

Further to the above, I am mindful that the Framework is explicit in stating that “*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*” (Para 32). The Policy fails to have regard to this. I recommend:

- **Delete Policy 5.2.2**

Policy 5.2.3 seeks to ensure that development outside Alrewas provides sufficient amenity space and respects local character. This has regard to the Framework and is in general conformity with the strategic policies of the Lichfield Local Plan. Both documents protect local character.

Part of the Policy states that “*any expansion*” outside Alrewas must protect and enhance the Conservation Area and the natural environment. No evidence has been provided to demonstrate that any housing growth outside Alrewas, no matter where it is located, will be able to enhance the Conservation Area, or the natural environment. In the absence of any such evidence, this appears to be an unduly onerous requirement that fails to have regard to national policy, or be in general conformity with the strategic policies of the development plan. I note that heritage assets are already protected by strategic and national policy.

I am concerned that the requirement to provide visual and physical barriers between new and existing development will pose problems relating to the integration of new

developments into the existing community. Indeed, the approach set out in Policy 5.2.3 is in direct conflict with Policy 5.6 of the Neighbourhood Plan, which refers to the need for development to integrate into its surroundings. It also fails to have regard to Para 61 of the Framework, which requires the integration of new development into the existing environment.

Taking all of the above into account, I recommend the following changes to enable the Policy to meet the basic conditions:

- **Policy 5.2.3, change to “*New residential development outside the existing built area of Alrewas must provide an appropriate level of additional village amenity space and respect its local context.*”**

Policy 5.2.4 states that developments on the village boundary will retain existing views in and out of the Conservation Area as far as possible. There is no evidence to demonstrate to what, if any, degree such views can be retained. Neither national nor local strategic policy requires views into and out of Conservation Areas to be retained. There is nothing in the Neighbourhood Plan, or in its supporting documents, to demonstrate what the views worthy of protection, from within and into the Conservation Area, comprise. The Policy does not have regard to national policy and does not contribute to the achievement of sustainable development. It does not meet the basic conditions. I recommend:

- **Delete Policy 5.2.4**

Policy 5.2.5 refers to expansion locations. As set out above, this Policy sets out an approach that is not supported by an appropriate evidence base. As a direct consequence, the Policy is not in general conformity with the strategic policies of the Lichfield Local Plan. It promotes a pattern of development that may prevent, and which does not contribute to, the achievement of sustainable development. I recommend:

- **Delete Policy 5.2.5**

Policy 5.3 simply repeats existing policy. I recommend:

- **Delete Policy 5.3**

Policy 5.4.1 repeats existing policy and in so doing, seeks to provide the Parish Council with a role in allocating affordable housing. No substantive evidence has been provided to justify the introduction of this responsibility and to set out on what basis the Parish Council would allocate affordable housing. It comprises a matter beyond the control of the Neighbourhood Plan. I recommend:



- **Delete Policy 5.4.1**

Policy 5.4.2 is a positive policy that promotes the delivery of smaller properties. The policy has regard to the Framework, which supports the delivery of a wide choice of homes (Chapter 6).

No indication is provided as to how the Neighbourhood Plan will “*encourage*” the provision of smaller homes. I address matter this below. Also, it is not clear why smaller scale properties or properties with “*low massing*” would reduce the impact of development on neighbouring properties. Protecting residential amenity can be achieved by all manner of different design techniques and no substantive evidence has been presented to demonstrate that simply building smaller properties, or properties with “*low massing*” will protect the living conditions of neighbours. I note that, together, national policy and local strategic policy protect residential amenity. I recommend:

- **Policy 5.4.2, change to “*New developments of smaller properties (eg 3 bed or fewer), and those suitable for older people, that together, provide for a recognised need in the village, will be supported.*”**

I note that Policy 5.1.2 already addresses development in the smaller hamlets of Overley and Orgreave. Policy 5.5 makes the statement that small-scale development close to the hamlets will be “*deemed sustainable*.” This is a sweeping statement that has no regard to what a development proposal might comprise. It fails to have regard to national policy, which does not suggest, in any way, that development in rural areas will be sustainable if it is near to existing hamlets.

The Policy goes on to set out that further development at remote properties will be supported. This is in direct conflict with Para 54 of the Framework, which states that isolated new homes in the countryside should be avoided. The Policy does not contribute to the achievement of sustainable development and I recommend:

- **Delete Policy 5.5**

Good design is recognised by the Framework as being integral to sustainable development and the reference in Policy 5.6 to Building for Life principles is reflective of this. However, to demand that all developments must be assessed by a non-mandatory checklist introduces an unduly onerous requirement. Furthermore, the nature of many development proposals means that they could not possibly “*achieve 12 out of 12 Greens*” as many of the Building for Life criteria will simply not be relevant or applicable.

Consequently, whilst the intent of Policy 5.6 has regard to national policy, it is neither implementable nor appropriate in practice. I recommend:

- **Policy 5.6, change to “*New residential development must respect its surroundings and result in the provision of high quality homes. To achieve this, proposals should, where appropriate, demonstrate how the following factors have been taken into account: (include the 12 Building for Life Criteria here)*”**

Policy 5.7 refers to an Appendix of the Neighbourhood Plan. The Appendix does not form part of the Neighbourhood Plan. Furthermore, I am mindful that Policy 5.7 seeks to introduce a subjective scoring mechanism to assess planning applications. There is no evidence to demonstrate that such an approach is in general conformity with the strategic policies of the Lichfield Local Plan, that it has regard to national policy or advice, or that it would contribute to the achievement of sustainable development. I recommend:

- **Delete Policy 5.7**

Economic Development

Policy 6.1 supports the conversion of any building to commercial use. Whilst I note that this support is qualified by reference to other Policies in the Neighbourhood Plan, it may, for example support the conversion of houses within a residential street to commercial use. No evidence has been presented to demonstrate that such a change of use would not harm the living conditions of neighbours, with regards to say, outlook or privacy. This would fail to have regard to national policy and would not be in general conformity with local strategic policy – both of which protect residential amenity. I note that recent changes to permitted development mean that some changes of use to commercial use do not require planning permission.

However, the general intent of the Policy has regard to national policy, which supports a prosperous rural economy (Chapter 3). I recommend:

- **Policy 6.1, change to “*The small scale expansion of existing employment premises will be supported, subject to proposals demonstrating that they respect local character and protect residential amenity.*”**

Policy 6.2 aims to prevent shops and commercial properties being converted to residential use. In seeking to promote healthy communities, national policy requires planning policies to protect against the unnecessary loss of valued services and facilities. However, Policy 6.2 does not clearly define “*village centre retail and other commercial properties*” and as such, adopts a broad-brush approach. Consequently, it is not clear, for example, whether Policy 6.2 conflicts with permitted development rights, that allow for the conversion of commercial uses to residential uses without the need for planning permission.

Furthermore, it may be that a change of use may incorporate some residential and some commercial use and that this would support the viability and sustainability of a development. The supporting text simply states that “*the further loss of shops...must be resisted.*” This does not allow for flexibility. I recommend:

- **Policy 6.2, change to “*Development that results in the loss of shops as a result of proposals for change of use will be resisted.*”**

Policy 6.3 requires commercial development to take into account impacts on noise, traffic and car parking. This has regard to the Framework and is in general conformity with the strategic policies of the Lichfield Local Plan, which together amongst other things, protect residential amenity. No changes are proposed.

Policy 6.4 supports small scale commercial development subject to its impacts on local character. Again, this has regard to the Framework and is in general conformity

with the strategic policies of the Lichfield Local Plan, which together amongst other things, protect local character. No changes are proposed.

Policy 6.5 is a positive policy that supports commercial development beyond the A38, as long as it contributes to providing a footbridge. This has regard to national policy support for supporting a prosperous rural economy (Chapter 3). However, as worded, the Policy would allow for any scale of development and this may result in development of such a scale that it would not be appropriate to the Neighbourhood Area. In this regard, there is an opportunity to relate Policy 6.5 to the preceding Economic Development Policy. I recommend:

- **Policy 6.5, change to “*Commercial development to the...across the A38 and where the proposed development is in keeping with the character, size, scale and nature of the Parish.*”**

Policy 6.6 generally supports tourism development. This has regard to Para 28 of the Framework which states that neighbourhood plans should “*support sustainable rural tourism.*” No changes are proposed.

Neighbourhood Plan – Other Matters

- **Page 58, delete second paragraph (refers to “allocation” of 90 units)**
- **Delete third and fourth paragraphs (contain historic, unnecessary and potentially confusing information)**
- **Page 59, delete all text (comprises unnecessary, incorrect and confusing information)**
- **Page 60, delete all text (contains unnecessary, historic information)**
- **Page 61, underneath title add “*The Appendices listed below comprise reports and information that supported the plan-making process. The reports and information are available from the Parish Council.*”**

8. Summary

I have recommended modifications further to consideration of the Alrewas Neighbourhood Plan against the basic conditions. I am especially mindful that I have recommended the deletion of a considerable number of Policies.

Given the above, it is appropriate to comment that I am concerned that the Alrewas Neighbourhood Plan was submitted in the form that it was. There is no doubt whatsoever that the Neighbourhood Plan is the result of many, many hours of intensive, voluntary work. It is with particular regard to this that it is disappointing that fundamental conflicts with the basic conditions were not addressed at an earlier stage – this would have avoided abortive work and resulted in a Neighbourhood Plan better suited to the examination stage.

Neighbourhood Planning is no longer new. I completed examination of the first comprehensive Neighbourhood Plan to be made early in 2013. Since this time, many examples of good practice in neighbourhood planning have emerged and there is plentiful advice and guidance to help steer the production of neighbourhood plans. It is, in my view, essential that neighbourhood plan-makers and in particular, professional advisers, are aware of – and adopt – good practice and up-to-date advice.

Whilst I am sorry that some of the work that has gone into the Neighbourhood Plan has effectively been aborted, I note that my recommendations simply reflect the legislative requirement of meeting the basic conditions. I imply no criticism of the volunteers who have dedicated time and effort to bring forward a Neighbourhood Plan with the purpose of making Alrewas an even better place.

Subject to the recommended changes, the Alrewas Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Taking the above into account, I find that the Alrewas Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

I recommend to Lichfield District Council that, subject to the modifications proposed, the **Alrewas Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area -- I am required to consider whether the Referendum Area should be extended beyond the Alrewas Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Alrewas Neighbourhood Area as approved by Lichfield District Council on 19 February 2013.

Nigel McGurk, August 2015
Erimax – Land, Planning and Communities

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Joint Henley and
Harpsden
Neighbourhood Plan

For further information, see www.jhhnp.org.uk

