

# Response 22

## Respondent Details

| Information                              |  |
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| <b>Respondent Number:</b> 22             | <b>Respondent ID:</b> 187268974        |
| <b>Date Started:</b> 17/03/2022 10:25:38 | <b>Date Ended:</b> 17/03/2022 10:31:01 |
| <b>Time Taken:</b> 5 minutes 23 seconds  | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Agent                                   |

## Your comments

| Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below. |
|--|
| Response received via email from Woolf Bond Planning on behalf of Westbourne Homes and Debrecq (Crossways) Ltd.<br><br>Please see attachments.   |

| Q3. You can upload supporting evidence here.   |
|--|
| <ul style="list-style-type: none"><li>• File: CROSSW~1.PDF</li><li>• File: JHHNPE~1.PDF</li><li>• File: JHHNP_~1.PDF</li><li>• File: 19-J31~2.PDF -</li><li>File: 19-J31~1.PDF</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

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|--|--|
| <b>Title</b>                                   | -  |
| <b>Name</b>                                    | Graham Ritchie                               |
| <b>Job title (if relevant)</b>                 | -  |
| <b>Organisation (if relevant)</b>              | Woolf Bond Planning                          |
| <b>Organisation representing (if relevant)</b> | Westbourne Homes and Debrecq (Crossways) Ltd |
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Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified



## Woolf Bond Planning

Chartered Town Planning Consultants

Our Ref: DB/GR/8109

16<sup>th</sup> March 2022

Planning Policy  
Freepost SOUTH AND VALE CONSULTATIONS  
South Oxfordshire District Council  
135 Eastern Avenue  
Milton Park  
Milton  
OX14 4SB

**Sent in electronic format by email to [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)**

Dear Sir/Madam,

### **CONSULTATION ON THE PROPOSED DRAFT MODIFICATIONS TO THE JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN 2020-2035 Regulation 16**

#### **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 under local plan policy H16 by the Neighbourhood Plan Group's independent advisors. 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) which should be omitted from the plan.

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;
- Baseline Report on Pre-Submission Draft (Regulation 14) Joint Henley and Harpsden Neighbourhood Plan (September 2021)
- 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 Proposed Modifications envisaged 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 (Draft Modified Policy DS7) 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 land 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 suitable 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 and another designation.

### **Representation on draft housing allocations in policy DS1.**

Through the Proposed Modifications to the existing 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 relevance to the Modifications envisaged to the existing 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 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 inconsistency with the approach of the NPPF and Local

Plan should therefore be omitted and replaced with sites which 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 guidance<sup>1</sup> and regulations<sup>2</sup>, the emerging Neighbourhood Plan should comply 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 draft Modifications to the Neighbourhood 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;**

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<sup>1</sup> NPPF, paragraph 29

<sup>2</sup> Basic conditions for a Neighbourhood Plan

- 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.” (My underlining)

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 objections from the Chilterns Conservation Board are material and go to the fundamental issue of compliance with strategic policies concerning the AONB in the local plan (policies STRAT1 and ENV1). Their objection concluded at section 6, paragraph 6.1 as follows:

**CCB's overall recommendations.**

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."

The Baseline Report (page 84) also 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."** (My underlining)

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<sup>3</sup> on the draft allocation plan. This is especially important as no changes have been made to the Baseline Report with regard to the identified impacts of the Highlands Farm site since the earlier consultation. This is illustrated by the unchanged assessment of the site on page 84 of within the Baseline Report from September 2021 (Included as an appendix)

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:

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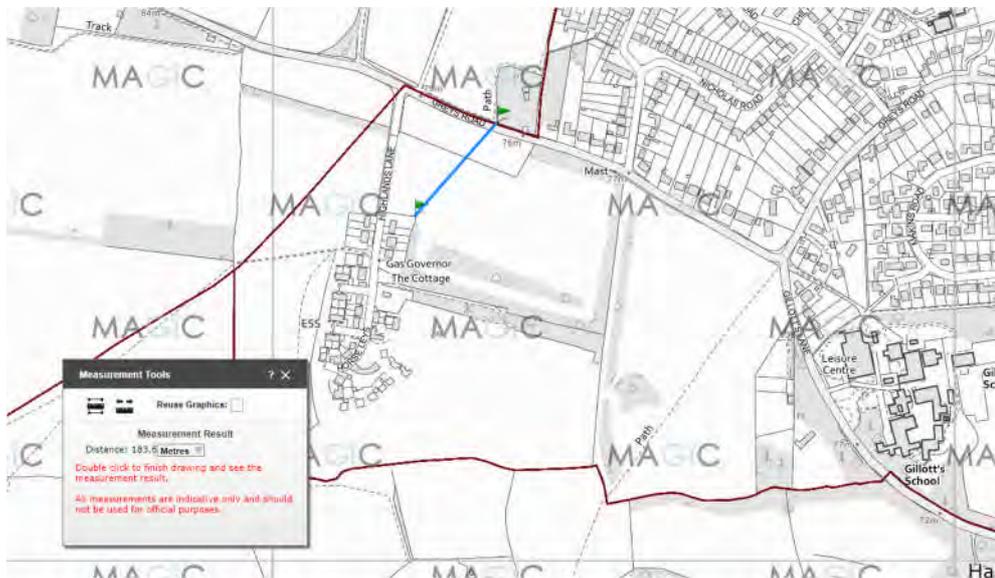
<sup>3</sup> Regulation 14 representation from Chilterns Conservation Board

**“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. 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.**

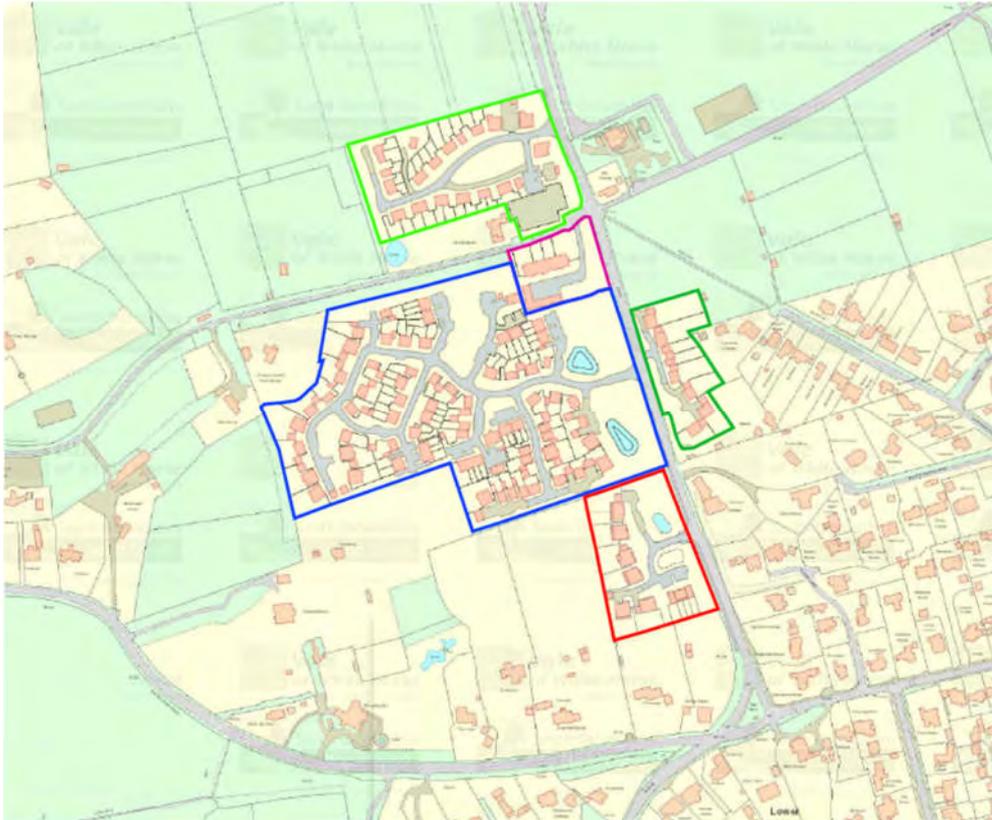
**It is considered that the site is situated beyond the edge of the currently built-up area, in a transitional location that is more rural in character. As such, it is more akin to the countryside than a built-up area, such as a settlement.**

**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) and development further to the west, beyond which lies open countryside. This therefore contrasts 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. Furthermore, landscape comments dated 13<sup>th</sup> January 2022 received in relation to the current application before the District Council (no. P21/S4616/FUL) confirm that “**..some development of the site may be possible without significant landscape harm**”. Accordingly, the site, in principle, is appropriate for development and with it, visual change given its well enclosed characteristics by both landscape and built form.

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)<sup>4</sup>.

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 HEN1<sup>5</sup>, 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.

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 Road<sup>6</sup>, 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.

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<sup>4</sup> Sites listed as contributing towards the Plan area's affordable housing need on page 68 of the Baseline Report

<sup>5</sup>at least 135 dwellings on the sites at Thames Farm (95 dwellings) and Wyevale Garden Centre (40 dwellings)

<sup>6</sup> By reference to the District Council's assessment of the planning application for 20 dwellings on the site

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.

| <b>Appraisal in Site Assessment</b>   | <b>WBP commentary on assessment</b>  |
|---|--|
| 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.                                      | 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).   |
| 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. | As indicated, the contended preferable sites include a greenfield site within the AONB. The NPPF, Local Plan and Chilterns Conservation Broad (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. |

| Appraisal in Site Assessment  | WBP commentary on assessment   |
|---|--|
| <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>.<br/>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 and development further to the west, beyond which lies open countryside. 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.<br/>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. Finally, AECOM concluded that the Crossways site falls within the definition of infill development allowed for by SODLP policy H16.</p> |
| <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. The District Council’s landscape officer has confirmed that <b>“..some development of the site may be possible without significant landscape harm,”</b></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:<br/>A) filling of a small gap in an otherwise continuous built-up frontage; or<br/>B) Sites within settlements where the site is closely surround by buildings.</p>  |

| <b>Appraisal in Site Assessment</b>   | <b>WBP commentary on assessment</b>   |
|---|---|
|   | <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).</p> <p>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 constitute sustainable development.</p>   | <p>The rejection of the AECOM findings by the Neighbourhood Plan Group 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 allocation, especially as this would avoid areas within the AONB (which are protected by both the Local Plan and NPPF). Furthermore, development has been approved at Lower Shiplake on sites both within the Joint Neighbourhood Plan area and outside, including at Thames Farm, the former Wyevale Garden Centre and on land east of Reading Road. These confirm the suitability of Lower Shiplake for growth and since development here would avoid schemes within the high quality landscape associated with the AONB, it should be regarded as consistent with the strategy. It can therefore</p> |

| Appraisal in Site Assessment | WBP commentary on assessment  |
|------------------------------|---|
|                              | be regarded as sustainable development, unlike that contended in the site assessment. |

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 11 dwellings is feasible on the site taking into account arboricultural considerations and the need to provide landscaping/open space. This is shown on the site plan which has been submitted to the District Council as part of a pending planning application.



**Extract of site layout (ref 19-J3120-C101)**

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 addition 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**

That the Qualifying Body revises the Proposed Modifications to the Neighbourhood Plan to address the representations detailed in this statement before it is forward to an examiner. The necessary revisions to the Proposed Modifications to the Neighbourhood Plan includes removal of the unjustified housing allocation (Highlands Farm) which is inconsistent with the approach in the NPPF and the Local Plan. The latter sections of the statement 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 the **Highlands Farm allocation should be omitted** from the Proposed Modifications to the Neighbourhood Plan. My client's site at Land North of Crossways should be **inserted into the Proposed Modifications to the Neighbourhood Plan as an allocation for at least 11 residential dwellings**. Both changes would be consistent with the Basic Conditions required by the Act.

I am happy to enter into further dialogue with the Qualifying Body together with the Examiner 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 a long, sweeping underline.

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 Strategy<sup>7</sup>.

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 24<sup>th</sup> 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**

<sup>7</sup> 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.<sup>10</sup>

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.

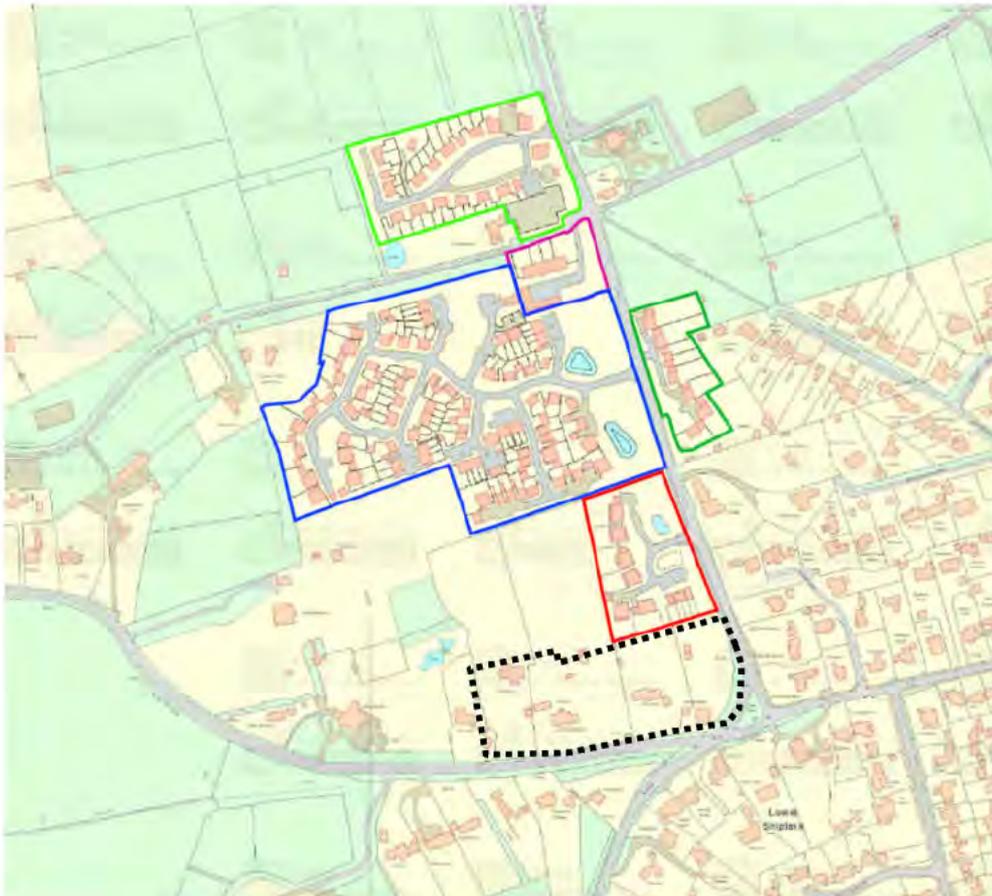
27. Analysis in the Council’s LCA says of the site before the latest development “contained on 3 sides”, “heavily influenced by adjacent housing”, “well contained by the existing built form at Chinnor” and “would not extend the settlement footprint into the wider landscape”. The proposal would therefore 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.

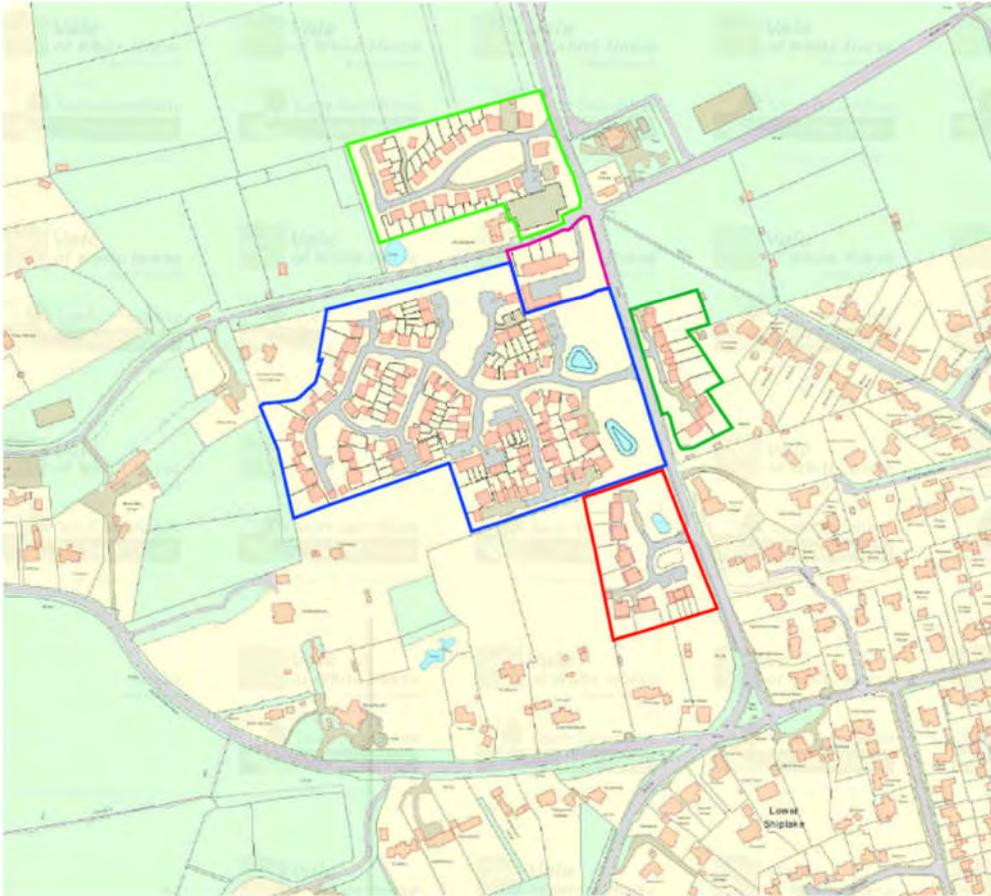
Lower Shiplake does not have a defined settlement boundary and therefore as acknowledged in the Chinnor appeal decision, it is therefore necessary to determine whether the Crossways site lies within its boundaries as a matter of planning

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 decision<sup>1</sup> 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*<sup>1</sup> 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

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<sup>1</sup> 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 appraisal<sup>2</sup>. 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)

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<sup>2</sup> 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*<sup>3</sup>.

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

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<sup>3</sup>Neighbourhood 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 1<sup>st</sup> 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 2<sup>nd</sup> 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 1<sup>st</sup> 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 Henley<sup>4</sup>.

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<sup>4</sup> 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”**

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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.

## 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**

**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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Joint Henley and  
Harpsden  
Neighbourhood Plan

# Joint Henley and Harpsden Neighbourhood Plan

2020-2035

Baseline Report

Pre-Submission (Regulation 14) Draft  
*September 2021*



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Joint Henley and  
Harpsden  
Neighbourhood Plan

Topic Paper 1

# Environmental Sustainability and Climate Change

*September 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. It is intended to provide an insight into how the plan has climate and environmental issues as a golden thread throughout the document.
- 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. Wanted – Your Views

- 2.1. Henley Town Council and Harpsden Parish Council invites representations on its Draft Neighbourhood Development Plan (known as the “Joint Henley and Harpsden Neighbourhood Plan” (JHHNP)). This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 as amended.
- 2.2. The consultation period runs from 20 September 2021 to 1 November 2021.
- 2.3. During this consultation we are consulting on the draft plan and associated evidence base. The Neighbourhood Plan Committee wants to gather the views of all stakeholders, particularly those who live, work, or do business in Henley and Harpsden.
- 2.4. 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.
- 2.5. 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

## 3. How to do this?

- 3.1. All responses to this consultation must be received prior to the end of the consultation period which is midnight on 1 November 2021. Responses must include a name, address and - if relevant - the organisation you are representing.

**We would prefer it at all possible that comments are made using an online feedback system – you can do this at: <https://jhhnp.org.uk/>**

- 3.2. However, you can also collect a hard copy of the feedback form from Henley Town Hall. Please return your completed form to the location you collected it from.

## 4. Purpose

- 4.1. The purpose of this topic paper is to demonstrate how the Plan has been developed and evidenced with a view to climate and environmental issues, to inform the pre-submission publication and examination of the Draft JHHNP.
- 4.2. 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.
- 4.3. The background papers are:
  - Paper 1 – Environmental, Sustainability and Climate Change
  - Paper 2 - Housing
  - Paper 3 - Retail, Town Centre and Economy
  - Paper 4 - Transport
  - Paper 5 - Infrastructure
- 4.4. These background papers can be downloaded from the Joint Henley and Harpsden Neighbourhood Plan website.

## 5. Introduction

- 5.1. Henley Town Council and Harpsden Parish Council are preparing a new Neighbourhood Plan. This will set out the key elements of the planning framework for Henley and Harpsden covering the period 2020 to 2035. Once 'made' it will replace the existing Joint Henley and Harpsden Neighbourhood Plan (JHHNP) which came into force in April 2016.
- 5.2. The review is necessary due to the requirements set out in the new South Oxfordshire District Council Local Plan which was adopted in December 2020. This includes delivery of new homes and employment land, meeting affordable housing needs and addressing environmental issues such as air quality. The Neighbourhood Plan needs to be reviewed to ensure it is up to date and able to continue strongly influencing planning decisions.
- 5.3. Planning policy and decision-making can make a significant contribution to reducing these levels of carbon emissions, through its influence over spatial planning, the energy performance and design of new development, transport and green infrastructure. However, many other interventions will be required beyond the remit of planning to achieve the national target in Henley and Harpsden. The Plan will also include wider strategies to help address key issues within the area which might not fall under planning. We have made sure to clearly differentiate between non-planning priorities and our planning policies.
- 5.4. In 2019, Henley Town Council declared a Climate Emergency. Henley Town Council's Climate Emergency 2030 Working Group (CE2030WG) has been formed to develop actions to reduce the Town's carbon emissions. The group are already undertaking initiatives with the objective of having project plans in place by 2030 to achieve net zero carbon emissions, many of which will already be operative before then.
- 5.5. The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Henley and Harpsden, that is the South Oxfordshire Local Plan. Throughout the document, for each Neighbourhood Plan policy, the relevant policies from this plan are referenced.

5.6. The Evidence Base will mirror the sections of the NP to enable easy read-across between each policy and the evidence underpinning it. Hence, as with the NP, each theme has its own chapter, subdivided into the objectives, supporting text and finally the policies themselves.

5.7. Evidence has been compiled from a number of sources:

- Extensive engagement with the community and local stakeholders including through focus groups, leaflet drops, local surveys and online representations.
- Compilation of statistics and facts from existing documents and reports relating to Henley and Harpsden.

## 6. Vision & Objectives

6.1. The vision statement for the revised Plan embeds a commitment to environmental sustainability (tackling climate change) and states that: **“In 20 years’ time, Henley on Thames and the surrounding village of Harpsden will have a sustainable community, meeting the needs of current and future generations who live and work here and for visitors where possible. The community will be resilient in its capacity to address the likely impact of climate change whilst still protecting the special qualities of the area.”**

6.2. The revised Neighbourhood Plan includes the following environmental objectives:

- EO1 – To prioritise the protection and enhancement of the following features:
  - The physical townscape and the river including *all National Trails and local footpaths, working with appropriate groups such as the Chiltern Society, CPRE, Ramblers Association and footpath working groups.*
  - Key views
  - AONB and Harpsden Valley
  - Existing green spaces
- EO2 – To improve public access to green spaces (existing and new compensatory green space for any amenity lost to development), to the river and to the wider countryside. There is potential for green spaces to be linked through green chains and corridors. Public green spaces should also be supported by cycling and walking connectivity in line with transport objectives TO1 and TO2.
- EO3 – To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity.
- EO4 – To expect all new development to contribute to lowering carbon emissions through good building design and enhancement of the natural environment.
- EO5 – To require new development to respond to local character, materials and colour palette corresponding to the SODC Design Guide and the Supplementary Technical Notes on local building materials.
- EO6 – To support community energy projects.
- EO7 – To conserve and enhance the unique historic and natural environment assets of the area which make an important contribution to the quality of new development, the economy and social infrastructure of the town and village whilst increasing their energy efficiency.
- EO8 – To seek to boost Air Quality.
- EO9 - Encourage the provision of Electric charging points in new development.

## 7. Planning Context

### Legislative Background

- 7.1. The Government in 2018 launched a 25 year Environmental Plan<sup>1</sup> which sets out how it will improve the environment over a generation by creating richer habitats for wildlife, improving air and water quality and curbing the scourge of plastic in the world's oceans.
- 7.2. The Climate Change Act 2008<sup>2</sup> (amended in June 2019) commits the UK to reducing emissions of carbon dioxide and other greenhouse gases to zero by 2050. Progress against the 2050 target is measured by legally binding carbon budgets, which cap the amount of greenhouse gases that can be emitted by the UK over a five-year period (measured by the Committee on Climate Change).
- 7.3. Once the Environmental Bill comes into place, this will go some way to ensure that the Government's 25 Year Environment Plan and its Net Zero Carbon Emissions by 2050 goal can be achieved. The bill includes numerous measures including: environmental governance; the clean air strategy; biodiversity net gain and trees.

### Building Regulations

- 7.4. The Building Regulations Part L set the energy efficiency standards for residential buildings. They are divided into part L1A, which covers new build, and part L1B, which covers renovations to existing buildings.
- 7.5. The Future Homes Standard anticipated to replace Building Regulations L and F in 2025 will change building regulations so that from 2025 the Future Homes Standard will deliver homes that are zero-carbon ready. Homes built under the Future Homes Standard should produce 75-80% less carbon emissions compared with current levels and become net zero as the electricity grid continues to decarbonise. The intention is that homes built to the Future Homes Standard will not need to be retrofitted with any additional measures or technology to become net zero.

### The National Planning Policy Framework

- 7.6. The National Planning Policy Framework (NPPF) sets out the key national planning priorities for England. The NPPF, revised in February 2021<sup>3</sup>, is accompanied by online Planning Practice Guidance.
- 7.7. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. It states that, at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 7).
- 7.8. Paragraph 8 adds that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in

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<sup>1</sup> GOV.UK. 2021. *25 Year Environment Plan*. [online] Available at: <<https://www.gov.uk/government/publications/25-year-environment-plan>> [Accessed 12 May 2021].

<sup>2</sup> Legislation.gov.uk. 2021. *Climate Change Act 2008*. [online] Available at: <<https://www.legislation.gov.uk/ukpga/2008/27/contents>>

<sup>3</sup> GOV.UK 2021. *NPPF* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.9. Section 14 specifically addresses meeting the challenge of climate change, flooding and coastal change. It states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (paragraph 152).

7.10. Paragraph 153 and footnote 53 further requires that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures in line with the objectives and provisions of the Climate Change Act 2008. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

7.11. Paragraph 154 requires new development to be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.

7.12. Paragraph 155 goes on to state that to help increase the use and supply of renewable and low carbon energy and heat, plans should:

- i. provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- ii. consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- iii. identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.

## National Planning Practice Guidance

7.13. The following parts of the 'Climate change' section of Planning Practice Guidance (PPG) also highlights how important the issue is in planning, noting:

*“Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change. In addition to the statutory requirement to take the Framework into account in the preparation of Local Plans, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.”<sup>4</sup>*

7.14. The PPG provides clear guidance on the government's national standards for a building's sustainability and for zero carbon buildings. It states that:  
*“The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability. In this respect, planning authorities will need to take account of government decisions on the Housing Standards Review when considering a local requirement relating to new homes.*

*If considering policies on local requirements for the sustainability of other buildings, local planning authorities will wish to consider if there are nationally described standards and the impact on viability of development.”<sup>5</sup>*

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<sup>4</sup> (NPPG Paragraph: 001 Reference ID: 6-001-20140306

<sup>5</sup> NPPG Paragraph 009 Reference ID: 6-009-20150327

## Neighbourhood Planning Act 2017 <sup>6</sup>

- 7.15. Despite the over-arching legislation described in Chapter 2 there is in fact no explicit requirement or even encouragement from government for neighbourhood plans (as opposed to local plans made by the local authority) to address climate change mitigation and adaptation, with the exception of renewable energy.
- 7.16. The Government’s planning guidance (para 040) states that: “there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan.”
- 7.17. The Neighbourhood Plan must be in general conformity with the Local Plan and National Policy and meet the Basic Conditions:
- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
  - That the making of the neighbourhood plan contributes to the achievement of sustainable development.
  - That the making of the 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).
  - That the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- 7.18. The intention of our policies is not to simply duplicate planning policies that are already within the council’s local plan policy but will focus on what is missing, what could be strengthened and respond to local considerations.

## Local Context

### The South Oxfordshire District Council (SODC) Local Plan 2035<sup>7</sup>

- 7.19. The South Oxfordshire Local Plan 2035 (SOLP) was adopted in December 2020. It provides an overview of planning policy for South Oxfordshire, setting out how it should evolve and grow during the plan period (2011-2035). The Plan identifies locations for housing, retail and employment land as well as the infrastructure required to support this growth. Together with the adopted Neighbourhood Plans, the Local Plan forms the statutory development framework against which planning applications are determined.
- 7.20. The South Oxfordshire District Council Local Plan includes a number of relevant policies. ENV policies cover environmental topics and include a number of policies particularly relevant to climate change, including ENV1 (Landscape and Countryside, ENV2

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<sup>6</sup> Legislation.gov.uk. 2021. Neighbourhood Planning Act 2017. [online] Available at: <<https://www.legislation.gov.uk/ukpga/2017/20/contents/enacted>>.

<sup>7</sup> SouthOxon.gov.uk 2020 South Oxfordshire District Council Local Plan 2020 [online] Available at: [www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/02/SODC-LP2035-Publication-Feb-2021](http://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/02/SODC-LP2035-Publication-Feb-2021)

(Biodiversity - Designated sites, priority habitats and species), ENV3 (Biodiversity), ENV4 (Watercourses), ENV5 (Green Infrastructure in New Developments), ENV11 (Pollution – Impact from existing and/ or Previous Land uses on new Development and the Natural Environment- (Potential receptors of Pollution) and ENV12 (Pollution – Impact of Development on Human Health, the Natural Environment and/or Local Amenity - Potential Sources of Pollution).

- 7.21. Environmental Protection policies are prefixed EP. Policy EP1 covers air quality, EP3 discusses waste collection and recycling, and EP4 covers Flood Risk.
- 7.22. DES policies cover design. DES1 (Delivering High Quality Development) promotes design that is sustainable and resilient to climate change and identifies key design characteristics which help to respond to climate change. The policy seeks to integrate requirements to minimise energy consumption and mitigate water run-off and flood risks as components of all development.
- 7.23. These requirements are further expanded upon by policies DES8, DES9 and EP4. DES4 (Masterplans for Allocated Sites and Major Development) requires masterplans to demonstrate how active travel and public transport opportunities have been maximised. DES7 (Efficient Use of Resources) guides the efficient use of resources including land (in accordance with Policy STRAT5), the minimisation of waste during construction and the life cycle of the building, maximising passive solar, lighting, natural ventilation water efficiency and the re-use of materials. It also covers air and water quality measures, avoidance of development of areas of Best and Most Versatile (BMV) agricultural land and reuse of previously developed land and buildings.
- 7.24. DES8 (Promoting Sustainable Design) requires all new development to minimise carbon and energy impacts through its design and layout taking into consideration resilience to climate change and longevity of the proposal. The policy also supports elements of Policy DES1 and DES7. DES9 (Renewable Energy) encourages the incorporation of renewable and low carbon energy approaches within development.
- 7.25. Finally, DES10 (Carbon Reduction) requires development to incorporate carbon emission reductions either through on-site renewable energy, other low carbon technologies and/ or energy efficiency measures. It also requires an energy statement to be submitted.
- 7.26. There is no single policy in SOLP which is primarily dedicated to developer contributions. Planning obligations are, however, mentioned in policies INF1 (Infrastructure Provision) – in relation to infrastructure and services, required as a consequence of development, and provision for their maintenance; ENV3 (Biodiversity) in relation to compensation for unavoidable loss of biodiversity; EP1 (Air Quality) in relation to offsetting unavoidable air quality impacts remaining after mitigation; and finally H10 (Exception Sites and Entry Level Housing), which states that planning obligations will be used to ensure that certain conditions are met on small-scale affordable housing schemes outside of defined settlements.

## Environmental policies for Joint Henley and Harpsden Neighbourhood Plan

7.27. The application of this collective suite of policies can contribute towards the achievement of the environmental objectives in the Neighbourhood Plan; EO1 – To prioritise the protection and enhancement of the following features : •the physical townscape and the river including all National Trails and local footpaths, working with appropriate groups such as the Chiltern Society, CPRE, Ramblers Association and footpath working groups. •Key views •AONB and Harpsden Valley •Existing green spaces. EO2 – To improve public access to green spaces (existing and new compensatory green space for any amenity lost to development), to the river and to the wider countryside. There is potential for green spaces to be linked through green chains and corridors. Public green spaces should also be supported by cycling and walking connectivity in line with transport objectives TO1 and TO2. EO3 – To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity. EO4 – To expect all new development to contribute to lowering carbon emissions through good building design and enhancement of the natural environment. EO5 –To require new development to respond to local character, materials and colour palette corresponding to the SODC Design Guide and the Supplementary Technical Notes on local building materials. EO6 – To support community energy projects. EO7 – To conserve and enhance the unique historic and natural environment assets of the area which make an important contribution to the quality of new development, the economy and social infrastructure of the town and village whilst increasing their energy efficiency. EO8 – To seek to boost Air Quality. EO9 - Encourage the provision of Electric charging points in new development.

### Policy ENV1: Air Quality

#### Relevant Neighbourhood Plan Objectives:

TO3 - To ensure that new development minimises congestion and air quality impacts of vehicle traffic.

TO4 – To implement a range of innovative transport solutions in the JHHNP and surrounding areas using the Henley Transport Study.

TO5 – to enhance vehicle and car park management, exploring opportunities for additional town centre parking, encouraging use of the station car park, potentially use of a digital car park management system and support schemes which encourage electric vehicles. To reduce vehicle movements both on the edge of town and in the town centre.

7.28. As recognised in the SOLP, air quality is an issue within the Neighbourhood Plan Area, Policy HEN1 of the Local Plan expects the Neighbourhood Plan to address air quality issues. The purpose of this policy is to seek to minimise the impacts of development on air quality.

7.29. The public raised the issue of air quality in the town within the Neighbourhood Plan Survey. 84% of the respondents to the Survey undertaken in 2020/21 were concerned with air pollution, with the main areas of concern Reading Road, Bell Street and Duke Street. When asked about issues in respect of roads in the area, 55% of respondents were concerned over air pollution and vibration from Heavy Goods Vehicles.

7.30. Since 1997, Henley has had an Air Quality Management Area and results have shown it exceeds air quality standards in terms of nitrogen dioxide. The source of the problem is

road traffic, primarily congestion building up along Duke Street, exacerbated by the canyon effect of a narrow road with tall buildings either side.

7.31. The draft Air Quality Action Plan for South Oxfordshire (published as final in 2014, as well as a Low Emission Strategy in 2015), set out specific measures for Henley, one of these included the introduction of an Intelligent Traffic System. This was an Oxfordshire County Council (OCC) initiative designed to smooth the traffic flow within Henley and reduce queuing times. OCC predicted this would have a positive effect on air quality; however the NO<sub>2</sub> concentrations continued to rise.

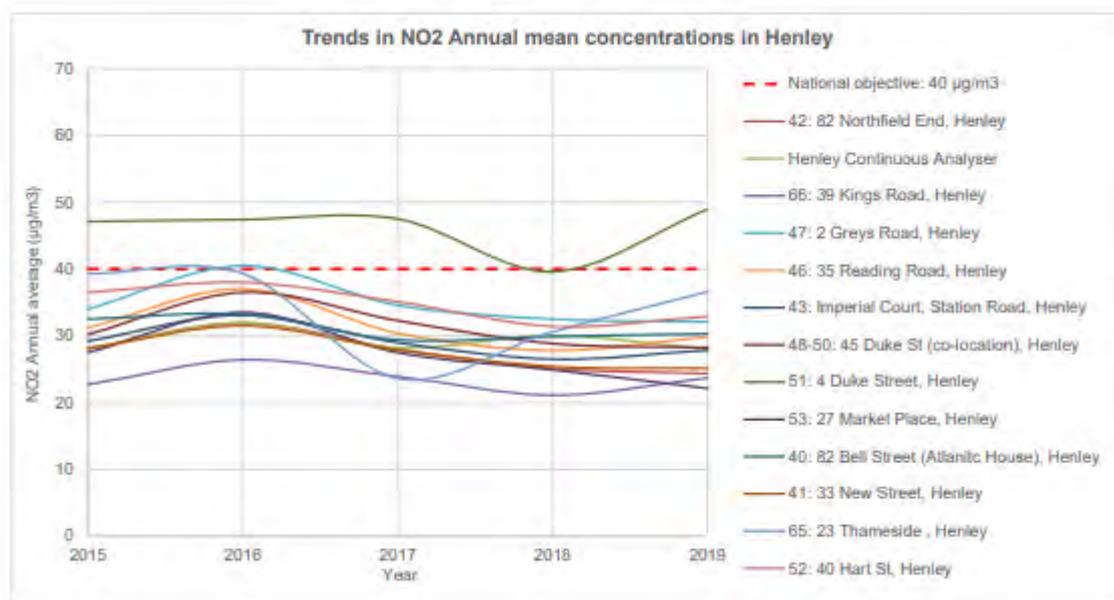


Figure 1: Trends in NO<sub>2</sub> Annual mean concentrations in Henley as recorded in SODC 2020 Annual Status Report. [https://oxfordshire.air-quality.info/documents/SODC\\_2020\\_ASR\\_PDF.pdf](https://oxfordshire.air-quality.info/documents/SODC_2020_ASR_PDF.pdf)

7.32. As part of the AQMA, SODC continues to monitor NO<sub>2</sub> (nitrogen dioxides emissions) at their various monitoring points around the NA, including the town centre. The LAQM 2020 Annual Status Report states that there was an exceedance recorded in Henley AQMA located at 4 Duke Street, which recorded an annual average of 49 µg NO<sub>2</sub>/m<sup>3</sup> which exceeds the EU and UK threshold of 40 micrograms/cubic metres. The five-year trend of NO<sub>2</sub> levels in the district and within Henley AQMA continues to be a decreasing one, but some of the monitoring sites in Henley have registered higher concentrations than in 2018.

7.33. The Town Council are conducting additional air quality testing, including of particulates in Greys Road and nitrogen dioxide in the Bell Street area. The nitrogen dioxide monitoring follows the DEFRA calendar and Technical Guidance. The Council decided to extend the nitrogen dioxide measuring in June 2021 because it was concerned about some high results, and to enable longer term averages to be calculated.

7.34. NO and NO<sub>2</sub> measurements for Henley are shown for the past year during Covid-19 lockdown restrictions at <https://oxfordshire.air-quality.info/location/henley/period/year/>

- 7.35. It is considered that the following locations are sensitive locations for air quality in Henley:
- AQMA
  - Crew Clothing, 3 Bell Street (highest levels in 3 December onwards diffusion tube measurements of nitrogen dioxide)
  - Schools and nurseries
  - Henley is a historic town with narrow pavements. It places pedestrians in closer proximity to vehicle exhausts than wider walkways allow.
- 7.36. One of the key issues with air quality is linked to the volumes of through traffic and particularly of HGVs. This is a particular problem within Henley, where the existing road network is already well used, and HGVs create and add to problems such as congestion, road safety, harm to the environment and quality of life in the area. Complaints made by the local community include, but are not limited to, vibration and impact on historic buildings, intrusion, noise and air pollution from HGVs travelling through the Town.
- 7.37. A proposal to include a 7.5 tonne weight limit on the bridge was made by the Transport Strategy Group (TSG) of Henley Town Council. This group was convened as a result of the Transport Study proposed in the first Neighbourhood Plan.
- 7.38. A group of residents formed to lobby for a 7.5 Tonne Environmental Weight limit Traffic Regulation Order (TRO) for the town and surrounding parishes. The application for this TRO will focus on vibration damage to historic buildings, danger to pedestrians on narrow pavements, and Air pollution. The support is evidenced through a petition which has over 2000 signatures.
- 7.39. On 23 March 2021 OCC agreed in principle to an to an environmental weight restriction on HGVs travelling through Henley, subject to funding being found, and completion of the necessary studies.
- 7.40. The Town Council will support:
- a) work with the Local Highway Authority to put a Traffic Regulation Order in place within the Plan Period. This order will cover through traffic only and will permit HGV traffic to local businesses.
  - b) Work with local businesses to manage HGV traffic related to their operations.
  - c) Keep a watching brief on the proposal for an alternative bridge across the Thames, working with SODC and OCC to minimise the impact on the Neighbourhood Plan area.
  - d) Put in place monitoring to ensure that the objectives of this is policy are being met.
- 7.41. OCC are currently reviewing the Local Transport Connectivity Plan (LTCP) as part of which they have produced a number of baseline papers and a report. A specific part of the consultation is about Freight Strategy. This discusses freight routes and associated issues.
- 7.42. A low emission zone feasibility study (undertaken in 2015) sets out key actions to reduce air pollution.<sup>8</sup>

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<sup>8</sup> [http://democratic.southoxon.gov.uk/documents/s7214/SODC%20LES\\_2015\\_V3\\_Final%20edited%202.pdf](http://democratic.southoxon.gov.uk/documents/s7214/SODC%20LES_2015_V3_Final%20edited%202.pdf)

Figure 3: The five core LES themes



7.43. The Henley Transport Study identifies issues and opportunities when it comes to air Quality (PG 101) which are still relevant to Henley today. The opportunities include;



7.44. The Henley and Harpsden Transport Study Report Addendum (September 2021) has been produced to provide an update on the transport conditions in Henley from the 2015 study to the present day in relation to:

1. Air Quality and Health
2. Public Transport Provision
3. Road Safety and Accident Data
4. Traffic Count Data

7.45. The Addendum states that there have been significant changes in transport policy since 2015, but the objectives of the Henley and Harpsden Transport Study (2015) remain aligned and will contribute to deliver be a carbon neutral district by 2030.

7.46. The 2020 Air Quality Annual Status Report (ASR) South Oxfordshire District Council set out measures which have been put in place to improve the air quality within the district. Additional measures include:

- Providing personalised travel planning
- School and workplace travel planning
- Bus route improvements (such as providing RTP1)
- Promoting low emission public transport
- Car and lift sharing schemes

- Car clubs

7.47. A Climate Emergency 2030 Working Group was established by the Town Council in 2019 following the declaration of a Climate Emergency. A number of projects have been undertaken to improve air quality including:

- Planting – installed planters with vegetation that absorbs roadside pollution around the town centre
- Henley Car Club – in April 2021 the Council launched a car club with Co-wheels. The first two vehicles are low emitting cars (Toyota Yaris hybrid), and, if the car club expands, the Council has expressed the wish that future vehicles will be electric. The first vehicle is parked in Upper Market place and the second is on Reading Road between Perpetual Park Drive and Fairview Estate. As well as reducing air pollution the car club also aims to reduce parking congestion, lower embedded carbon dioxide by replacing several privately owned cars with a single shared vehicle and save residents money on the costs of owning and running a car.
- No-idling, closed door – the Council has supported ‘Clean Air for Henley’ campaigns on no-idling and closed doors (for roadside shops to protect their staff and customers from air pollution)
- Walking – the Council has supported and is continuing with several projects to encourage walking rather than driving.
  - Slow Ways – the Council has endorsed this project to connect town and villages with pedestrian routes
  - TSG has supported a project to put up walking signs giving the time it take to walk between popular locations in and around Henley, and this is being coordinated with Walkers are Welcome. Locations have been proposed and precise signage locations are being investigated
- Cycling
  - the Council offers its staff a cycle to work scheme
  - HTC identified locations for cycle racks which have been installed by OCC at locations around the town centre
  - TSG has agreed to investigate a web-based cycle map in and around Henley
- [SODC Turn it Off](#) campaign

7.48. As well as having direct effects on public health, habitats and biodiversity, these pollutants can combine in the atmosphere to form ozone, a harmful air pollutant (and potent greenhouse gas) which can be transported great distances by weather systems. Odour and dust can also be a planning concern, for example, because of the effect on local amenity.

### **Policy ENV1: Air Quality**

Development should not damage health by increasing emissions of harmful pollutants. Such pollutants include greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health.

In addition to meeting the assessment and mitigation policies in the Local Plan and Air Quality Action Plan and SODC AQ Developer's Guidance, all Major development and substantial refurbishment must be designed to minimise harmful emissions to air. In particular:

- a) Such development must aim to demonstrate that it is 'air quality neutral' (i.e. better than existing or the existing benchmark) and where possible should contribute to the reduction of concentrations of regulated air pollutants below WHO guidelines in the JHHNP Area by 2022 and thereafter.
- b) All replacement development should aim to be less polluting than existing development that it will replace.
- c) Development in the plan area that would worsen an existing breach of a limit value or cause a breach is inconsistent with the law and with sustainable development.

Relevant Neighbourhood Plan Objective:

EO2 – To improve public access to green spaces (existing and new compensatory green space for any amenity lost to development), to the river and to the wider countryside. There is potential for green spaces to be linked through green chains and corridors.

EO3 – To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity.

7.49. The green spaces and biodiversity assets in Henley and Harpsden are very important in making it such a high-quality place. This was a view reinforced by the local community in the survey where respondents wanted to maximize green space habitat/ biodiversity and provide connections between them.

7.50. This policy seeks to maintain and enhance the natural environment and its intrinsic ecological value. The application of policies ENV2, 3 and 4 can contribute to objective EO3: To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity.

7.51. Although there are no European protected sites for biodiversity located within the Neighbourhood Plan area. There are three Sites of Special Scientific Interest (SSSIs) that fall within the Neighbourhood Plan area, as detailed below:

- Harpsden Wood SSSI is located in the south of the Neighbourhood Plan area. It was notified in November 1990 and is approximately 25.83 ha in size. Based on the most recent condition assessment, 100% of the SSSI is classified as 'Favourable'<sup>9</sup>
- Highlands Farm Pit SSSI is located in the western part of the Neighbourhood Plan area. It was notified in 1986 and is approximately 0.6 ha in size. Based on the most recent condition assessment, 100% of the SSSI is classified as 'Favourable'<sup>10</sup>
- Lambridge Wood SSSI is located partially within the northernmost section of the Neighbourhood Plan area. It was notified in March 1984 and is approximately 73.8 hectares (ha) in size. Based on the most recent condition assessment, 57.03% of the SSSI is classified as 'Favourable' and 42.97% of the SSSI is classified as 'Unfavourable – Recovering'.<sup>11</sup>

7.52. SSSI Impact Risk Zones (IRZ) are a GIS tool/ dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location,

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<sup>9</sup> Natural England (no date) Harpsden Wood SSSI [online] available:

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1000307.pdf>

<sup>10</sup> Natural England (no date) Highlands Farm Pit SSSI [online] available:

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002576.pdf>

<sup>11</sup> Natural England (no date) Lambridge Wood SSSI [online] available:

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002730.pdf>

including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this context, the northern part the Neighbourhood Plan area overlaps with SSSI IRZs for development types which are likely to be taken forward through the Neighbourhood Plan (i.e. residential and rural residential development types). However, it is useful to note that the scale of the development proposals likely to come forward through the Neighbourhood Plan are less likely to meet or exceed the SSSI IRZ thresholds.

7.53. Whilst there are no formally designated local biodiversity sites, there are a number of areas which are recognised for their contribution to the local ecological network. Mill Meadows is former farmland which regularly floods in winter and the water bring with them silt and aquatic vegetation. The Henley Wildlife Group has a licence agreement with the Council to manage part of it as a wetland habitat. The wildlife area includes Cold Bath Stream which feeds into the River Thames, several specially created ponds, areas of grassland, including strips of long grass which are good for invertebrates and wooded sections including specimen trees.

7.54. Further (non-designated) areas recognised for their biodiversity values include:

- **Valley Road Chalk Bank**- a man-made woodland<sup>12</sup> with tree-lined footpaths managed by the Greener Henley community group. Bird species such as the red kite have been spotted in the area.
- **Gillotts Field**- an open grassy area that provides sanctuary to a range of wildflowers including orange hawkweed (hound's tongue, musk mallow, and fox and cubs species), and bee and pyramidal orchids<sup>13</sup>.
- **Holy Trinity Churchyard**- an churchyard supporting over 200 species<sup>14</sup> of plants, including grassland and wild flowers (in summer) which provide habitats for birds, frogs, grass snakes, butterflies and moths.
- **Tilebarn Wood**- a semi-natural woodland area managed by the members of Greener Henley community group and the Sue Ryder charity, home to native oak trees.

7.55. There are also a range of Biodiversity Action Plan Priority (BAP) Habitats within and surrounding the Neighbourhood Plan area, including, but not limited to:

- Lowland calcareous grassland;
- Coastal and floodplain grazing marsh;
- Lowland fens;
- Deciduous woodland; and
- Woodpasture and parkland.

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<sup>12</sup> The Henley Standard (2018) Hidden Henley [online] available: <https://www.henleystandard.co.uk/news/hidden-henley/131855/hidden-henley.html>

<sup>13</sup> The Henley Wildlife Group (2018) Report for the Annual Town Meeting 5<sup>th</sup> April 2018.

<sup>14</sup> Holy Trinity Church (2020) What is happening in Trinity Churchyard? [online] available: <http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=2ahUKewj12oLKtdboAhWGi1wKHcR6A10QFjABegQIARAC&url=http%3A%2F%2Fwww.holytrinityhenley.org.uk%2Fchurchyard-25.html&usg=AOvVaw1TTpz8ukqN35WRE3Rya6k>

## Future baseline

- 7.56. The future baseline has been identified through the Strategic Environment Assessment.
- 7.57. Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.
- 7.58. Local Wildlife Sites act as wildlife corridors and have the potential to be impacted by new development which can remove the connection between habitats for species such as birds. Ecological sites can also be impacted by poor air quality and water quality, and factors such as noise and lighting can disturb vulnerable species.
- 7.59. The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.
- 7.60. The Town Council have introduced many initiatives to promote green conservation including on-going conservation work on Mill and Marsh Meadows, grassland management to encourage flora and fauna and reduced mowing to encourage wildlife. 18 bird boxes have been put up together with management and enhancement of the chalk bank and marsh meadow pond clearance. New projects include thinning of sycamores and native tree planting at Waterman's Spinney and preservation and enhancement of the peat marsh at Marsh Meadow.

### **Policy ENV2: Biodiversity**

A. Development should maintain and enhance the natural environment and its intrinsic ecological value. In particular, development is encouraged where it:

- a. identifies the local biodiversity and seeks to protect or enhance it through the creation of new wildlife areas or corridors;
- b. incorporates features such as nesting boxes and beehives alongside soil and planting that is likely to attract wildlife;
- c. provides new, multi-functional green space locally including appropriately managed, unconventional green space such as green walls and green roofs, and greening of incidental existing spaces within the public realm; and/or
- d. incorporates planting which will be resilient to climate change.

B. 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:

- a. incorporates sustainable planting in keeping with the character of the local area.
- b. includes a clear planting plan demonstrating resilience to disease, pests and climate change that is consistent with the principles of Policy ENV3 (Trees);
- c. is designed to ensure low maintenance effort and cost and,

d. where possible, is visible in whole or part from the public realm to capture associated well-being benefits.

### Policy ENV3: Trees

Relevant Neighbourhood Plan Objective:

EO3 – To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity.

- 7.61. This policy seeks to protect, maintain and enhance tree planting in order to meet objective EO3: To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity. Furthermore, The Town and District level Climate Emergency declaration and targets for carbon neutrality by 2030. Trees will also help Henley and Harpsden adapt to the effects of Climate Change.
- 7.62. The South and Vale Green Infrastructure Strategy and Landscape Character Appraisal state that Henley is on the interface between the Chilterns dip-slope and the Thames valley. The landscape is generally undulating, with locally steep valley sides, although the Thames valley is flat. Land cover is dominated by agriculture, comprising largely of medium sized, and regular to irregular arable and pastoral fields with a relatively strong hedgerow network. Blocks of woodland, including Ancient Woodland, and plantation are frequent. Varied riverside developments and landscaped grounds are frequent beside the Thames.
- 7.63. The Chilterns is one of the most densely wooded parts of the UK with nearly 22% woodland cover of which two thirds is ancient woodland - the highest proportion in the country. The Area of Outstanding Natural Beauty (AONB) also has a nationally-important concentration of high quality chalk grassland with over 700 ha. The Chilterns Area of Outstanding Natural Management Plan 2014-2019; contains a number of broad aims for the management of the Chilterns AONB.
- 7.64. On 19th August 2019, the Department for Environment, Food and Rural Affairs (Defra) announced several amendments to the Environment Bill, kick-starting the government's 'build back greener' mission. A first draft of the 2019-21 Bill was released October 2019 with revisions published in February 2020. Among the Bill's major focus areas are tree planting and woodland management.
- 7.65. As part of the 25-Year Environment Plan (published 2019)<sup>15</sup>, the government is set to expand and manage the woodland areas to increase the delivery of ecosystem services. The Environment Bill pledges to increase tree planting across the UK to 30,000 hectares of trees per year by 2025. England Trees Action Plan 2021 to 2024 sets out the long term vision for trees, woodlands and forests in England in response to the England Trees Strategy consultation.

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<sup>15</sup> Bills.parliament.uk. 2021. *Environment Bill - Parliamentary Bills - UK Parliament*. [online] Available at: <<https://bills.parliament.uk/bills/2593>>

- 7.66. National Planning Policy recognises the importance of trees, paragraph (131) states that “planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible”. This paragraph continues to confirm that applicants and local planning authorities “should work with local highways officers and tree officers to ensure that the right trees are planted in the right places”.
- 7.67. The changing climate will present a number of different challenges for trees, and this will require careful management. Given the long life span of a tree, planting decisions taken today must take account of the tree's future resilience to the impact of the warmer climate.<sup>16</sup>
- 7.68. The woodland trust identifies trees as critical for the future of the planet and for our own wellbeing, health and happiness. They can reduce air pollution; absorb CO2 from the atmosphere; give us shade and shelter; guard us against flooding; make our minds happier and healthier; create vital homes for wildlife.
- 7.69. Land Use: Policies for a Net Zero UK 2020<sup>17</sup> sets out a detailed range of options to drive emissions reductions in England, which includes the importance of increase tree planting - increasing UK forestry cover from 13% to at least 17% by 2050 by planting around 30,000 hectares (90 – 120 million trees) of broadleaf and conifer woodland each year.
- 7.70. According the UK natural capital: urban accounts<sup>18</sup> In 2017, the removal of air pollution by urban green and blue space in Great Britain equated to a saving of £162.6 million in associated health costs. The amount of carbon removed by woodland in UK urban areas was estimated to be worth £89.0 million during 2017.
- 7.71. The Conservation Area Appraisal Consultation Draft (CAAMP) states that maintaining existing trees and replacing lost or dying trees are an important part of the strategy to tackle climate change and trees also contribute considerably to the special interest of the conservation area. Street trees are a particularly important characteristic of the residential suburbs such the St Mark’s Conservation Area. These combined with trees in private gardens contribute to the sense of place. The avenues of trees are also a key characteristic of Fair Mile.
- 7.72. Permission is needed for any works to trees above a certain size in the conservation area (see Section 7.0 of CAAMP) and justification is required for the loss of any street trees, which should be also be replaced with new trees. A succession planting strategy would be beneficial to ensure existing tree coverage is maintained into the future and opportunities for new trees should also be considered. There are limited opportunities for new green public spaces within the conservation area, with the greening of existing routes through trees likely to be the most appropriate means of improving green infrastructure. However, there may be opportunities to green some of the car parks such as Waitrose and Greys Road, using hedges and planting in a similar manner to Goodall Close.

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<sup>16</sup> Land use: Reducing emissions and preparing for climate change, CCC 2018

<sup>17</sup> <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

<sup>18</sup> <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapital/urbanaccounts>

- 7.73. The woodland trust sets out why native trees are the best for biodiversity<sup>19</sup>. A 2019 study led by Richard Ennos also concluded that the UK's native trees have the potential to adapt to future conditions, including those expected due to climate change.
- 7.74. The policy specifies that where removal of a tree due to development is unavoidable all trees so removed must be replaced by appropriate species according to the emerging Henley Town Council Tree Strategy at a ratio of 3:1.
- 7.75. 2000 saplings were planted by volunteers as the Millenium Wood project in the year 2000. The saplings were a mix of native broadleaf species that were appropriate for the soil and moisture conditions of the clay gravel cap of the Chiltern Dip Slope. The following photograph illustrate the planting density. The saplings were 60/90 Bare root and were planted at an approximate spacing of 1.6 meters (5 feet). This gives a density of approximately 3600 trees/ hectare , or 1500 trees per acre. We are asking developers to ensure that there is good management of the trees particularly in their early years, a ratio of 3:1 is a realistic one to achieve the appropriate tree density.



#### **Policy ENV3: Trees**

##### **A. Protection and Maintenance:**

Any proposal for new development should contain plans for the protection of existing trees, including damage to roots. These can reach out radially to a distance greater than the height of the tree. Where removal of a tree due to development is unavoidable all trees so removed must be replaced by appropriate species according to the emerging Henley Town Council Tree Strategy at a ratio of 3:1.

##### **B. Enhancement**

Tree planting should be considered as a part of any new development either in individual gardens, or as a communal wooded area, or a combination of both. As a minimum three trees should be planted for each dwelling and plans put in place for the maintenance and upkeep of communal trees.

<sup>19</sup> <https://www.woodlandtrust.org.uk/blog/2020/07/biodiversity-and-native-woods/>

## Policy ENV4: Local Green Spaces

### Relevant Neighbourhood Plan Objectives:

EO1 – To prioritise the protection and enhancement of the following features:

- The physical townscape and the river including all National Trails and local footpaths, working with appropriate groups such as the Chiltern Society, CPRE, Ramblers Association and footpath working groups.
- Key views
- AONB and Harpsden Valley
- Existing green spaces

EO2 – To improve public access to green spaces (existing and new compensatory green space for any amenity lost to development), to the river and to the wider countryside. There is potential for green spaces to be linked through green chains and corridors. Public green spaces should also be supported by cycling and walking connectivity in line with transport objectives TO1 and TO2.

EO3 – To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity.

7.76. The policy seeks to designate sixteen areas, identified by the local community as important, as Local Green Spaces. This conforms with paragraph 102 of the National Planning Policy Framework.

7.77. The application of this policy can contribute towards the achievement of Objectives EO1 to prioritise the protection and enhancement of existing green spaces, EO2 to improve public access to green spaces and EO3 to protect and enhance urban and rural habitats of value.

7.78. The sixteen Local Green Spaces to be protected, as set out on the Policies Map in Part One are:

- 5) Mill and Marsh Meadows
- 6) Makins Recreation Ground
- 18) Chalk Bank
- 19) Gillotts Wood
- 20) Lucy's Farm – woodland
- 21) Corner of Harpsden Road and Sheepcote
- 22) Watermans's Spinney
- 23) Parkside wood
- 24) Henley College Wood
- 26) Sarah's Wood
- 27) Bottom of the Stony Road
- 28) Bottom of Little Hill
- 29) Top of Little Hill
- 31) Millennium woods
- 33) Harpsden Cricket Club
- 35) Harpsden Court

7.79. All of the Local Green Spaces are demonstrably special to the community and also to visitors, and workers of Henley and Harpsden. Figure 2 shows the Local Green Spaces on a

map. A detailed description of each, including how they meet the NPPF Local Green Space criteria, is then provided in the table below.

### Green Spaces Recommended for Designation



Figure 2 - Local Green Spaces

| Site Name                 | Publicly accessible | Subject to other designations? | Demonstrably special to the community with regards to: |  |  |                                      | NPPF Criteria   |
|---------------------------|---------------------|--------------------------------|--|--|--|--------------------------------------|---|
|                           |                     |                                | H<br>i<br>s<br>t<br>o<br>r<br>y                        | R<br>e<br>c<br>r<br>e<br>a<br>t<br>i<br>o<br>n | T<br>r<br>a<br>n<br>q<br>u<br>i<br>l<br>l<br>i<br>t<br>y | W<br>i<br>l<br>d<br>l<br>i<br>f<br>e |   |
| 5) Mill and Marsh Meadows | ✓                   |                                |  | ✓  | ✓  | ✓                                    | Mill and Marsh Meadows have particular significance in Henley because of the long, iconic river frontage. A Keep Britain Tidy Green Flag Award has been achieved for the last 7 years, which recognises the upkeep of facilities including bandstand, bowling green, toddler playground, living wall and celebration beds |

|                             |   |  |  |   |   |  |
|-----------------------------|---|--|--|---|---|--|
|                             |   |  |  |   |   | <p>Mill Meadows was purchased in 1921 as recreational space for the town. It includes separate play areas for both young children and older children, together with refreshments since 1931 and a bandstand for music at the weekends. A Portland Stone Obelisk believed to date from 1788 and originally installed in the Market Place to demonstrate Henley's civic pride and prosperity, was relocated to Mill Meadows in 1973. This is a listed monument (though has an incorrect location on the Listed Buildings Register).</p> <p>In 1966 Marsh Meadows was bought by the town. This is a tranquil space with an uninterrupted area of ground, rough grass and wildlife areas. Wildlife areas are maintained by volunteers from the wildlife branch of Greener Henley in association with the Parks Services.</p> <p>Recommendation : Local Green Space</p>                                   |
| 6) Makins Recreation Ground | ✓ |  |  | ✓ |   | <p>Makins Recreation Ground has particular local significance because of its recreational value and is a value to the community.</p> <p>The space provides recreation for a wide range of people and is easily accessible for all users. There is a children's play area, outdoor gym and skatepark and it is a popular recreational green space in the midst of housing. Surveys have shown that it is valued by residents for its excellent views over the valley of the River Thames. As well as open space for general recreational use, there is a beacon post which has been used for national celebrations such as the Queen's Jubilee, when a network of beacons were lit across the country. The outdoor gym and skatepark are the only such facilities in Henley.</p> <p>Makins Recreation Ground links to Makins Bank on its northern edge.</p> <p>Recommendation : Local Green Space</p> |
| 18) Chalk Bank              | ✓ |  |  | ✓ | ✓ | <p>Chalk Bank has particular local significance because of its tranquillity and richness of wildlife.</p> <p>This area provides an area of tranquillity within a busy built up area of housing. It provides an area for reflection and peaceful enjoyment</p>  |

|  |   |  |  |  |   |   |   |
|--|---|--|--|--|---|---|---|
|  |   |  |  |  |   |   | <p>providing wider views over Henley and the surrounding countryside. The 2004 Management Plan contains evidence of its local significance. The area is rich in wildlife and has been managed by the Henley Wildlife Group in association with the Council's Parks Services for over 20 years.</p> <p>The area is used by local schools for educational purposes. A new management plan is being written and this should be consulted for up to date information. The site provide good connections and accessibility to surrounding built up areas. The area warrants designation for Local Green Space.</p> <p>Recommendation : Local Green Space</p> |
| 19) Gillotts Wood                          | ✓ |  |  |  | ✓ | ✓ | <p>Gillotts Wood has particular local significance because of its tranquillity and richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p> <p>Recommendation : Local Green Space</p>  |
| 20) Lucys Farm – woodland                  |   |  |  |  | ✓ | ✓ | <p>Lucys Farm – woodland has particular local significance to Henley and Harpsden because of its tranquillity and richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is not covered by a Tree Preservation Order. It warrants designation of Local Green Space.</p> <p>Recommendation : Local Green Space</p>   |
| 21) Corner of Harpsden Road and Sheephouse |   |  |  |  |   | ✓ | <p>Corner of Harpsden Road and Sheephouse has particular local significance because of its richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is not covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p> <p>Recommendation : Local Green Space</p>  |
| 22) Waterma                                | ✓ |  |  |  |   | ✓ | <p>Watermans's Spinney has particular local significance because of its richness of wildlife.</p>   |

|                              |   |  |  |  |  |   |   |
|------------------------------|---|--|--|--|--|---|---|
| ns's Spinney                 |   |  |  |  |  |   | <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>Recommendation : Local Green Space</p>   |
| 23) Parkside wood            |   |  |  |  |  | ✓ | <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>   |
| 24) Henley College Wood      | ✓ |  |  |  |  | ✓ | <p>Henley Collegewood has particular local significance because of its richness of wildlife and tranquillity.</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 Henley College and 40 acre fields creating nature corridors.</p> <p>Recommendation : Local Green Space</p> |
| 26) Sarah's Wood             |   |  |  |  |  |   | <p>✓ Sarah's 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.</p> <p>Recommendation : Local Green Space</p>  |
| 27) Bottom of the Stony Road |   |  |  |  |  |   | <p>✓ Bottom of the Stony Road has particular local significance because of its richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is not covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p>  |

|                                     |   |  |  |  |   |   |   |
|-------------------------------------|---|--|--|--|---|---|---|
|                                     |   |  |  |  |   |   | Recommendation : Local Green Space  |
| 28)<br>Bottom<br>of Little<br>Hill  |   |  |  |  |   | ✓ | <p>Bottom of Little Hill has particular local significance because of its richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is not covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p> <p>Recommendation : Local Green Space</p> |
| 29) Top<br>of Little<br>Hill        |   |  |  |  |   | ✓ | <p>Top of Little Hill 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.</p> <p>Recommendation : Local Green Space</p>        |
| 31)<br>Millenniu<br>m woods         | ✓ |  |  |  |   | ✓ | <p>Millennium woods has particular local significance because of its richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is not covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p> <p>Recommendation : Local Green Space</p>      |
| 33)<br>Harpsden<br>Cricket<br>Field | ✓ |  |  |  | ✓ |   | <p>Harpsden Cricket Field has particular local significance because of its recreational value and therefore warrants designation for Local Green Space.</p> <p>Recommendation : Local Green Space</p>   |
| 34) The<br>Belt                     |   |  |  |  |   |   | <p>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>  |
| 35)<br>Harpsden<br>Court            |   |  |  |  |   | ✓ | <p>Woodland at Harpsden Court has particular local significance because of its richness of wildlife.</p> <p>The area is recognised as a Priority habitat – deciduous woodland but is not covered by a Tree Preservation Order. It is not protected by other designations and therefore warrants designation for Local Green Space.</p>                                      |



## Policy ENV5: Watercourses

### Relevant Neighbourhood Plan Objectives:

EO3 – To protect and enhance urban and rural habitats of value and seek to create new habitats to foster greater ecological diversity.

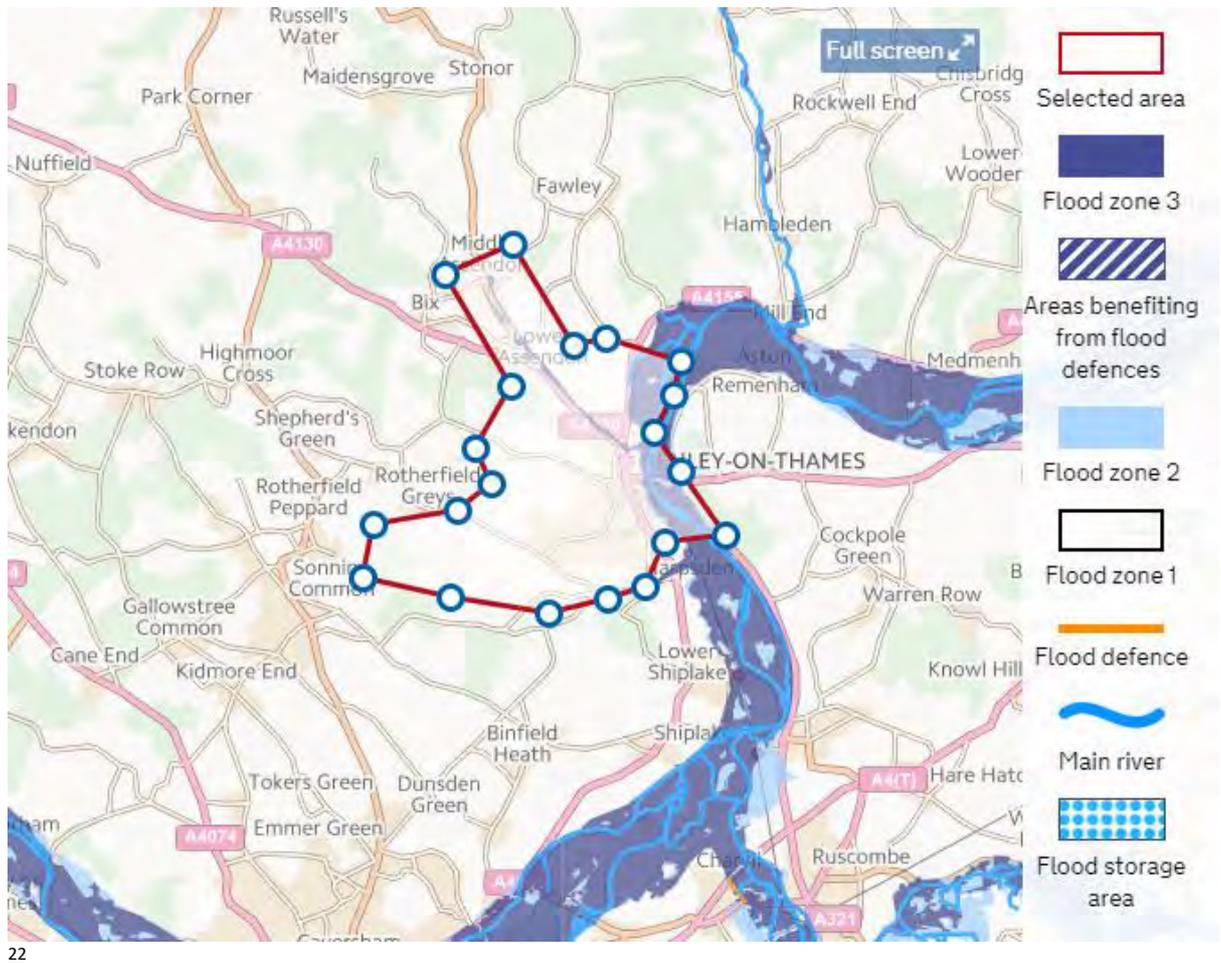
- 7.80. This policy seeks to raise awareness of the risks of flooding and the importance of early investigation of geology and drainage capacity of development sites.
- 7.81. In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change<sup>20</sup> suggests that South Oxfordshire and Oxfordshire have had higher per capita emissions than the South East of England and England since 2005. South Oxfordshire and Oxfordshire have both seen a 33.3% decrease in the percentage of total emissions per capita between 2005 and 2017, which is less than the reductions the South East of England (40.0%) and England (40.0%).
- 7.82. Per capita greenhouse gas emissions generated in the Neighbourhood Plan area are likely to continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies; however, increases in the built environment and carbon footprint of the Neighbourhood Plan would contribute to an increase in the total levels of greenhouse gas emissions.
- 7.83. Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18). This predicts a likely central estimate of increase in annual mean temperatures of between 1°C and 2°C; and the central estimate of change in annual mean precipitation of 0 to +20% in winter and -10% to -30% in summer. Due to these changes a range of risks may exist for the Neighbourhood Plan area that include an adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain; an increased risk of flooding, including increased vulnerability to 1:100-year floods; Soil erosion due to flash flooding and Increased drought and flood related problems such as soil shrinkages and subsidence and flooding of roads.
- 7.84. The Flood and Water Management Act (2010)<sup>21</sup> sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).
- 7.85. The areas at highest risk of flooding within the Neighbourhood Plan area are towards the eastern boundary, within proximity of the River Thames. The River Thames is a main river that flows through Southern England. Figure 4.1 (above) shows areas at risk from flooding from the River Thames are in Flood Zone 3, representing areas that have a 1% (1 in 100) or greater annual flood risk, and Flood Zone 2, representing areas that have between a

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<sup>20</sup> Department of Energy and Climate Change (2019) '2005 to 2017 UK local and regional CO2 emissions – data tables' [online] available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2017>

<sup>21</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%). Figure 3 shows the the Fluvial flood risk within the Neighbourhood Plan area.



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Figure 3 - Fluvial flood risk within the Neighbourhood Plan area

7.86. A Strategic Flood Risk Assessment (SFRA) for the district was published in 2013<sup>23</sup>. The SFRA has allowed SODC to carry out the Sequential Test for site allocations and the findings of the SFRA have influenced the distribution strategy for development as set out in their Core Strategy regarding minimising the risk from flooding.

7.87. The SODC Strategic Flood Risk Assessment<sup>24</sup> (SFRA), published in 2013, notes that, whilst the floodplain is relatively narrow, some flooding to property was reported in 1947, 1990, 2000 and 2003, though not in 2007 or 2012.

<sup>22</sup> GOV UK (2019): 'Flood Map for Planning' [online] available at: <https://flood-map-for-planning.service.gov.uk/>

<sup>23</sup> JBA Consulting (2013) Strategic Flood Risk Assessment Report July 2013 [online] available at: <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/evidence-studies/district-flood-risk>

<sup>24</sup> JBA Consulting (2013) Strategic Flood Risk Assessment Report July 2013 [online] available at: <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/evidence-studies/district-flood-risk>

7.88. The SFRA highlights Henley-on-Thames as a key settlement area and provides a summary of flood risk as follows: flood zones 2 and 3 present, low risk of surface water flooding, low risk of sewer flooding, high risk of groundwater flooding.

7.89. Figure 4 shows the risk of surface water flooding in the Neighbourhood Plan area, with the majority in low or very low risk areas, with localised areas of medium to high risk.

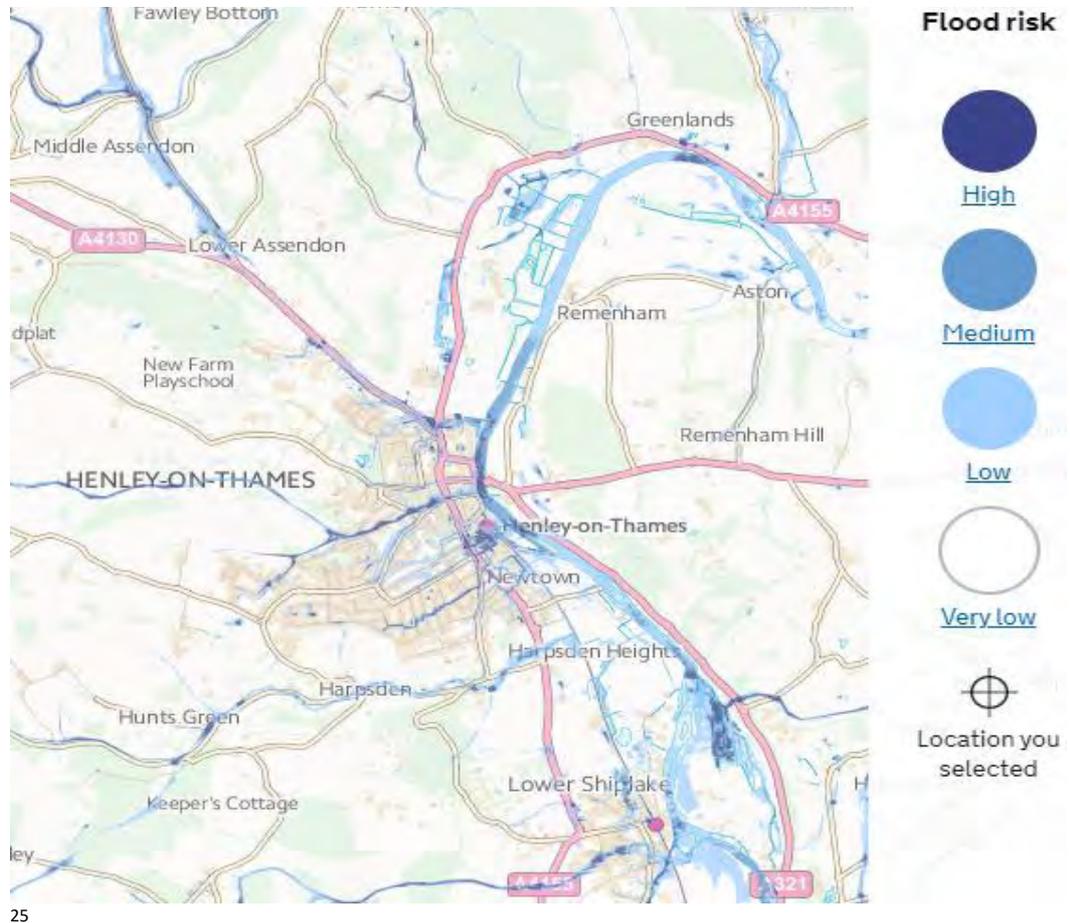
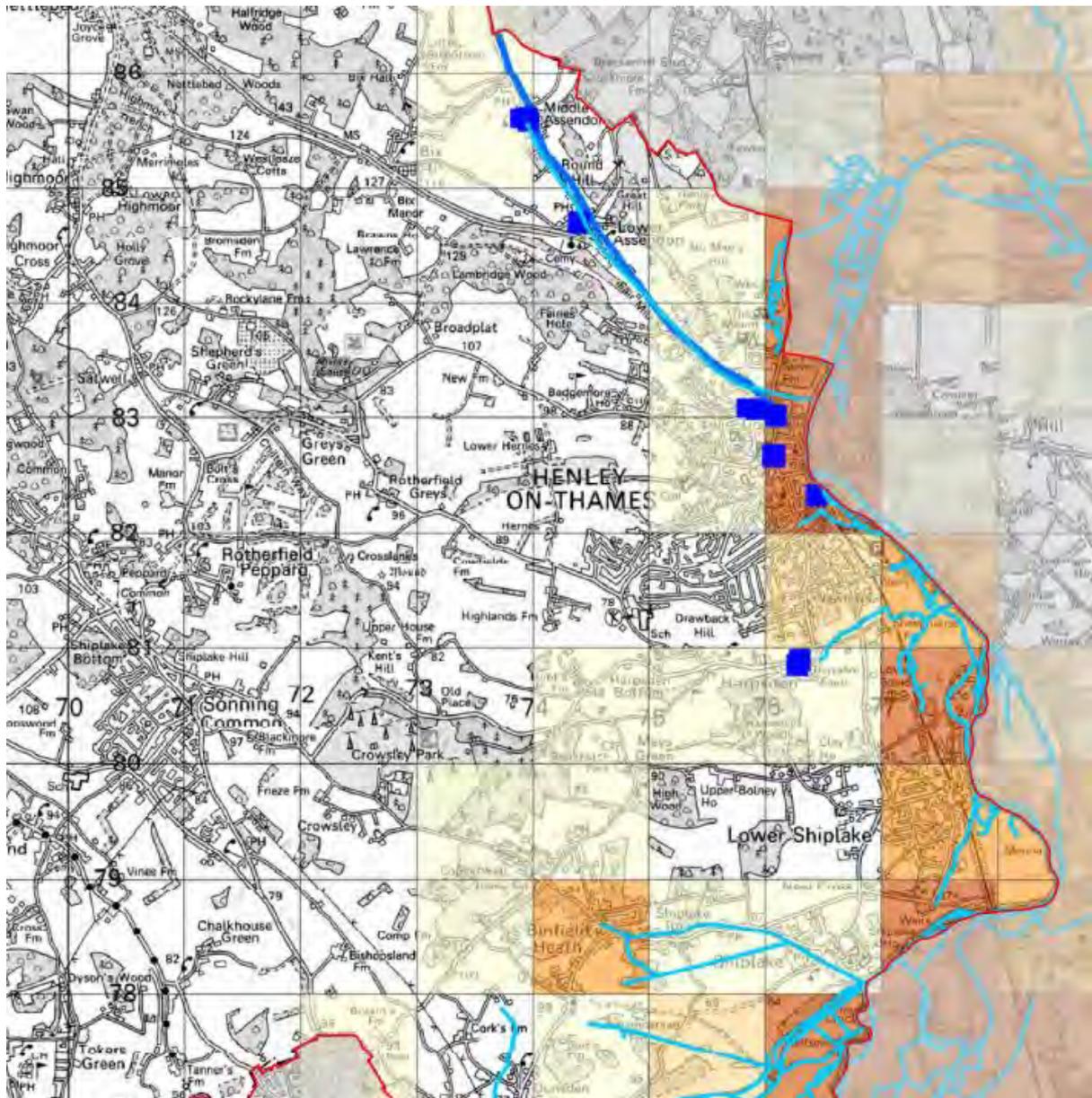


Figure 4 - Surface water flood risk within the Neighbourhood Plan area

7.90. **Figure 6** shows the risk of groundwater flooding in the Neighbourhood Plan area, with areas of highest risk located towards the east of the Neighbourhood Plan area towards the River Thames. The South Oxfordshire SFRA identifies Henley-on-Thames as being at high risk of groundwater flooding.

<sup>25</sup> GOV UK (2017): 'Long term flood risk assessment for locations in England' [online] available at: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/>



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Figure 5 - Groundwater flood risk. Source: JBA

**LEGEND**

South Oxfordshire

Vale of White Horse

Main Rivers

Watercourses reported as being affected by groundwater flooding in 2001

Reported Groundwater Flooding

**Risk of Groundwater Emergence**

$\geq 75\%$

$\geq 50\% < 75\%$

$\geq 25\% < 50\%$

$< 25\%$

<sup>26</sup> JBA Consulting (2013) Strategic Flood Risk Assessment Report July 2013, Map 6.1 Areas Susceptible to Groundwater Flooding [online] available at: [http://www.southoxon.gov.uk/sites/default/files/Map%206.1%20Areas%20Susceptible%20to%20Groundwater%20Flooding%20\(SODC\)Reduced.pdf](http://www.southoxon.gov.uk/sites/default/files/Map%206.1%20Areas%20Susceptible%20to%20Groundwater%20Flooding%20(SODC)Reduced.pdf)

## Future baseline

- 7.91. Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.
- 7.92. Per capita greenhouse gas emissions generated in the Neighbourhood Plan area are likely to continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies; however, increases in the built environment and carbon footprint of the Neighbourhood Plan would contribute to an increase in the total levels of greenhouse gas emissions.
- 7.93. The high-level review of the British Geological Survey (BGS) maps show the bedrock geology is the White Chalk subgroup<sup>27</sup>, described as: *“Chalk with flints. With discrete marl seams, nodular chalk, sponge-rich and flint seams throughout. Typology of flints and incidence of marl seams is important for correlation”*. The SEA identified this as a potential issue.
- 7.94. The main watercourse flowing through the Neighbourhood Plan area is the River Thames, which flows through the eastern part of the plan area, to the east of Henley. The River Thames is a main river that flows through Southern England, from Gloucestershire to London.
- 7.95. Henley and Harpsden are located within the Thames River Basin District and the Neighbourhood Plan area falls within the ‘Thames and Chilterns South’ Management Catchments and the ‘Chilterns South’ Operational Catchment. The Neighbourhood Plan area is covered by the Thames Catchment Flood Management Plan<sup>28</sup> which aims to promote more sustainable approaches to managing flood risk.
- 7.96. Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency’s Catchment Data Explorer<sup>29</sup> classifies the 13 water bodies in the Chilterns South catchment as ranging from ‘Bad’ to ‘Good’ ecological status (with seven of the 13 water bodies classes as ‘Moderate’) and a ‘Good’ chemical status. The ‘reasons for not achieving good status’ (RNAGs) are primarily attributed to the following activities; water industry, agriculture and rural land management, and urban and transport factors.
- 7.97. The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination.
- 7.98. Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste water discharges, water run-off, and modification. Water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive

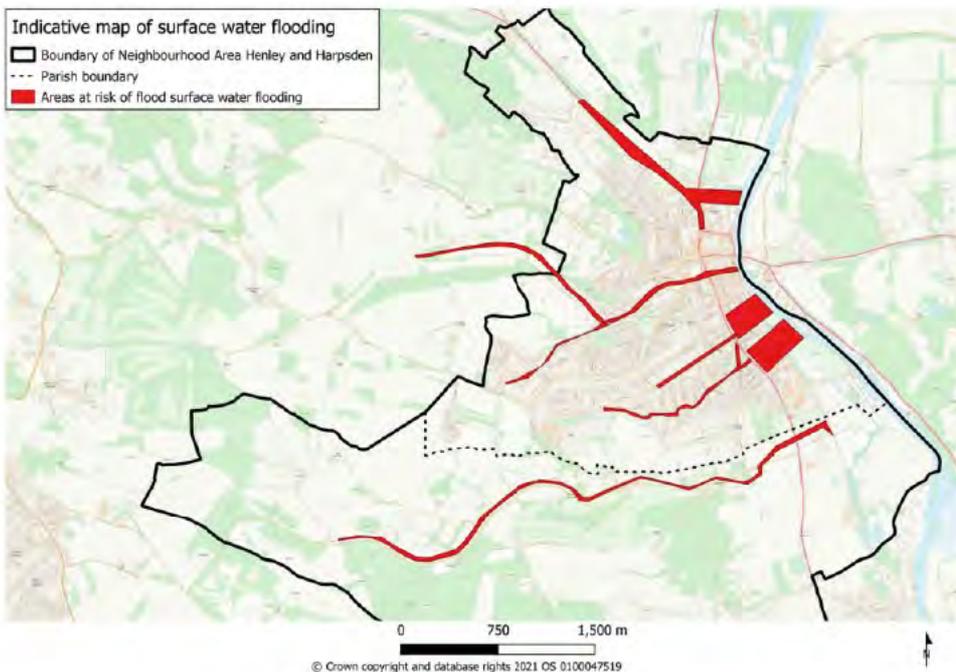
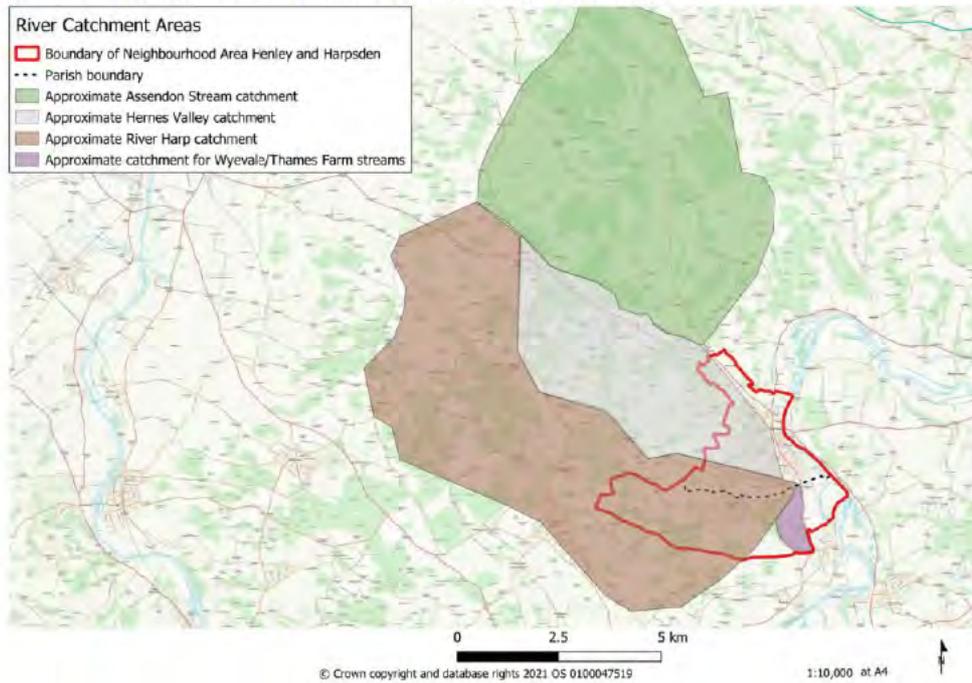
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<sup>27</sup> British Geological Society (2019) Geology of Britain Viewer [online] available at: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

<sup>28</sup> Environment Agency (2009) Policy paper: Thames: Catchment flood management plan [online] available at: <https://www.gov.uk/government/publications/thames-catchment-flood-management-plan>

<sup>29</sup> Environment Agency (2019): ‘Catchment Data Explorer’ [online] available at: <https://environment.data.gov.uk/catchment-planning/>

are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area. However, it will be important for new development to avoid impacts on water quality and support the objectives of the Water Resource Management Plan in reducing consumption and improving efficiency.



**Watercourses**  
 Development should have regard to the geology and drainage capacity of the site and the consideration of the watercourses map.

## Sustainable Policies

Policy SD1: Minimising Carbon Emissions.

Policy SD1a: Fabric First Approach.

Policy SD1b: Other Methods

**Relevant Neighbourhood Plan Objective:**

**EO4 – To expect all new development to contribute to lowering carbon emissions through good building design and enhancement of the natural environment.**

**EO6 – To support community energy projects in line with the government’s Community Energy Strategy 2014.**

7.99. This policy seeks to encourage new development to minimise both the embodied carbon during construction and minimise the operational carbon emissions by design using the Fabric First Approach. To meet objective EO4 which expects all new development to contribute to lowering carbon emissions through good building design and enhancement of the natural environment.

7.100. Henley faces a number of challenges such as fuel poverty and high energy bills.<sup>30</sup> The following information demonstrates this.

7.101. Data taken from the Energy Performance of Buildings Data in England and Wales<sup>31</sup> shows that Henley and Harpsden energy performance of buildings lack behind other stock in London and the South East. The energy efficiency rating of domestic buildings for Henley is lower than South Oxfordshire and England as shown in Figure 6 below.



Figure 6- Energy Efficiency rating (SAP points) Data source: DCLG data collected between 2009 – 2016.

7.102. The table below, taken from SODC Towns Emissions Modelling, provides an overview of the CO<sub>2</sub> emissions per capita for all sources and for residential buildings. It shows that Henley has a high level of CO<sub>2</sub> emissions compared with other towns in South Oxfordshire.

<sup>30</sup> See Topic Paper 1: Environmental, Sustainability and Climate Change

<sup>31</sup> <https://epc.opendatacommunities.org/login>

<sup>32</sup> The energy efficiency rating, expressed in Standard Assessment Procedure (SAP) points, is a score between 1 – 100 with 1 being poor energy efficiency and 100 being excellent energy efficiency. The energy efficiency gap is currently 13.1 (the difference between the current average rating of building alongside the potential rating).

| District          | Town        | CO2e emissions per capita (tonnes) for all sources | CO2e emissions per capita (tonnes) for residential buildings |
|-------------------|-------------|--|--|
| South Oxfordshire | Didcot      | 8.93   | 2.14   |
| South Oxfordshire | Henley      | 9.88   | 3.05   |
| South Oxfordshire | Thame       | 9.22   | 2.44   |
| South Oxfordshire | Wallingford | 9.25   | 2.45   |

Figure 7- Per Capita Emissions –Overview<sup>33</sup>

7.103. Buildings are awarded A EPC rating if their energy efficiency rating is equal or above 92. Only homes that have been built, bought, sold or retrofitted since 2008 have an EPC, which present about 50 to 60 per cent of homes within a local authority area.

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<sup>33</sup> SODC Towns Emissions Modelling, June 2021

Henley has 0 Band A rated buildings according to data collected by DCLG between 2009 – 2016 shown in figure 8. A map showing both EPC and Fuel Poverty data is shown in Figure 9.

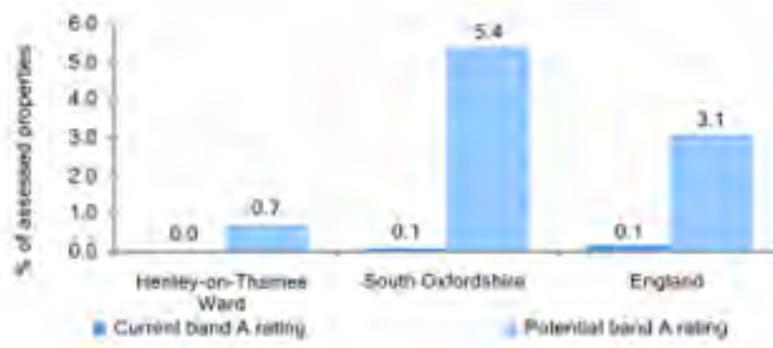
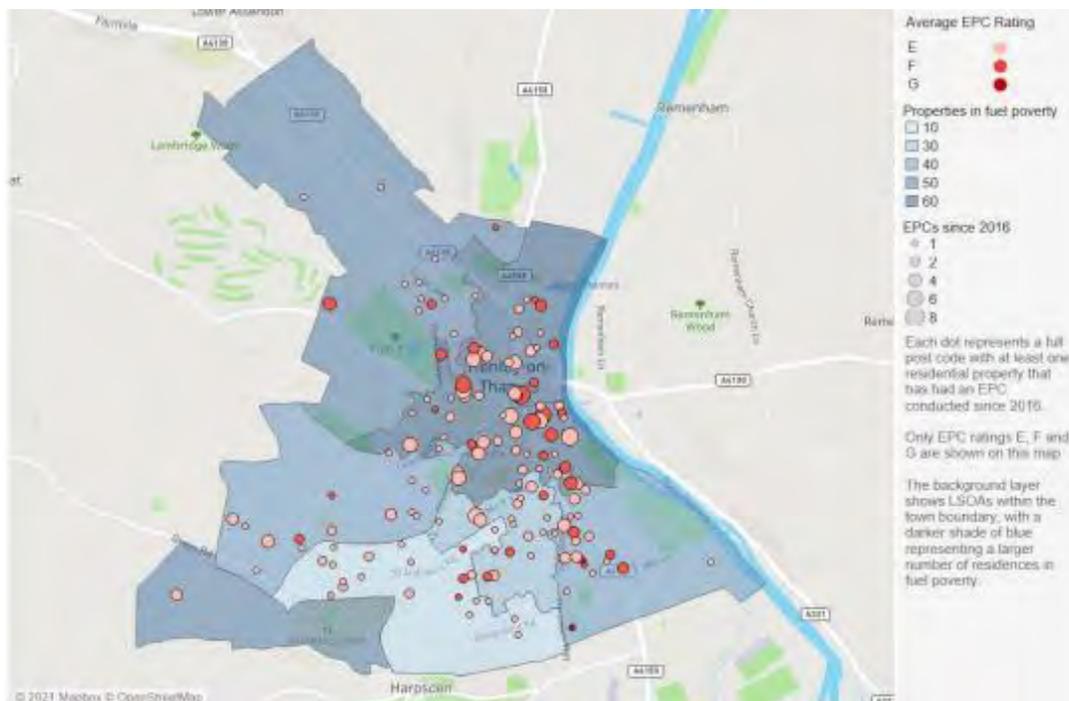


Figure 8 - Band A (high energy efficiency) rated buildings<sup>34</sup>



35

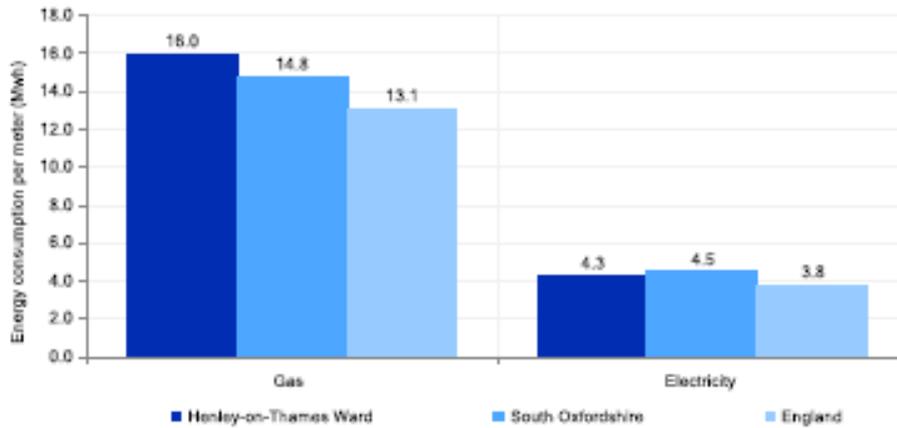
Figure 9 - EPC Ratings per postcode, and Fuel Poverty rates per LSOA

Dots are used to indicate EPC data. Each dot represents a full post code where at least one EPC has been performed since 2016. The colour of the dot indicates the number of EPCs. Only EPC scores of E, F or G are included.

7.104. The following diagram (Figure 10) shows that Henley energy consumption of gas is above South Oxfordshire and England in 2015.

<sup>34</sup> Data source: DCLG data collected between 2009 – 2016.

<sup>35</sup> SODC Towns Emissions Modelling, June 2021



36

**Figure 10 - Domestic and electricity consumption, 2015**

- 7.105. The maps below shows details of the absolute emissions (figure 11) and residential buildings emissions (figure 12) per capita, in tCO<sub>2</sub>e, per LSOA. Each shaded area indicates the boundary of a Lower Super Output Area (LSOA) within the town. A lighter shade indicates lower absolute emissions, a darker shade indicates higher emissions.
- 7.106. The maps show that the town centre has the high rates of emissions both absolute and residential and this is also that area that contains the oldest buildings.

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<sup>36</sup> Department for Business, Energy and Industrial Strategy, 2015 (consumption). Not connected to gas network, 2019

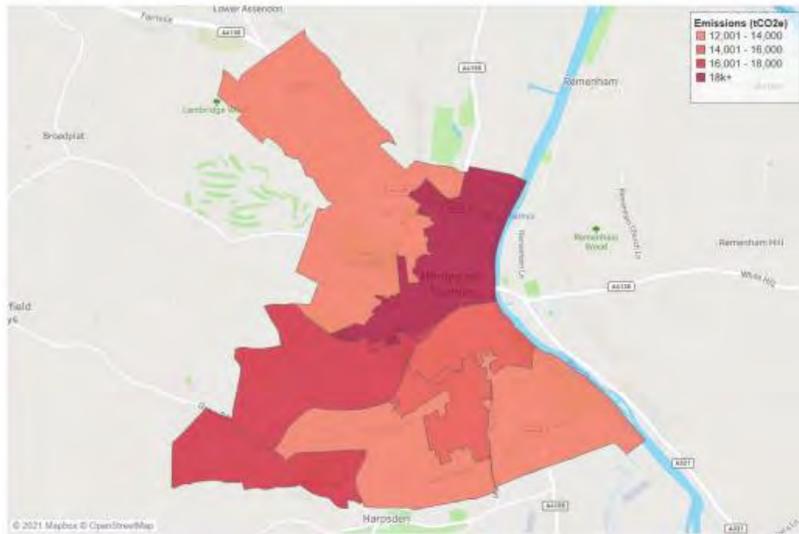


Figure 11 - Absolute emissions per LSOA, for Henley-on-Thames

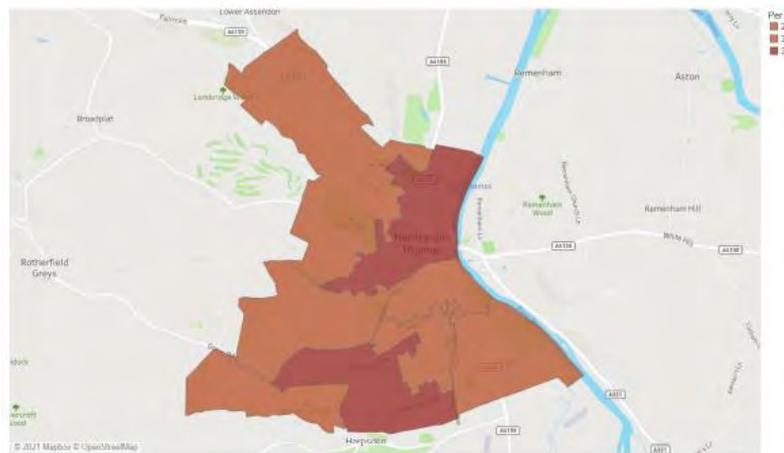


Figure 12 - Residential buildings emissions per capita, per LSOA for Henley-on-Thames

37

7.107. There are many opportunities to improve the energy efficiency and reduce the carbon footprint of historic buildings in Henley and Harpsden. The Conservation Area Appraisal 2020 (consultation draft) includes opportunities for new developments, means of responding to climate change. The following diagram shows that this is a particular issue for this NPA, Henley has a higher number of dwellings built before 1945 when compared with South Oxfordshire and England.

<sup>37</sup> SODC Towns Emissions Modelling, June 2021

Figure: Dwellings by age of dwelling (year property was constructed)  
 Source: Valuation Office Agency (VOA) 2020

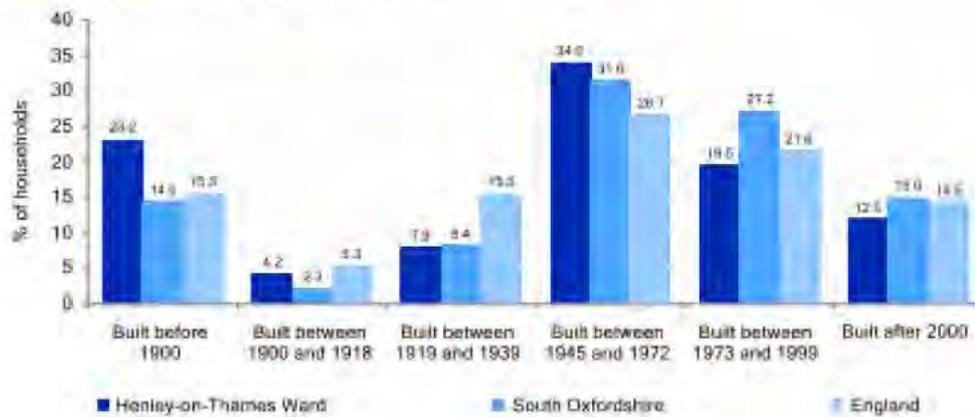


Figure 13 - Dwellings by age of dwelling (year property constructed)

- 7.108. The Building Regulations Part L set the energy efficiency standards for residential buildings. They are divided into part L1A, which covers new build, and part L1B, which covers renovations to existing buildings.
- 7.109. The Future Homes Standard anticipated to replace Building Regulations L and F in 2025 will change building regulations so that from 2025 the Future Homes Standard will deliver homes that are zero-carbon ready. Homes built under the Future Homes Standard should produce 75-80% less carbon emissions compared with current levels and become net zero as the electricity grid continues to decarbonise. The intention is that homes built to the Future Homes Standard will not need to be retrofitted with any additional measures or technology to become net zero.
- 7.110. EnerPHit as a best practice standard to achieve good air-tightness and insulation in retrofit and Passivhaus for new development.
- 7.111. A Climate Emergency 2030 Working Group was established by the Town Council in 2019 following the declaration of a Climate Emergency. The Town Council have been involved with projects to reduce carbon emissions, see Appendix A.

**Policy SD1: Minimising Carbon Emissions.**

**Policy SD1a: Fabric First Approach**

Fabric First required for any development that requires planning permission.

A) A 'fabric first' approach to building design would be recommended to maximise the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems. Developers should consider:

- a) Minimising the use of high carbon cost building materials such as Concrete, Cement and Steel.

- b) Maximising use of materials which score highly on Building for Life criteria<sup>38</sup> such as wood, wood and/or hemp fibre.
- c) Using modern design techniques such as EnerPHit as a best practice standard to achieve good air-tightness and insulation in retrofit and Passivhaus for new development.

#### **Minimising Carbon Emissions.**

##### **Policy SD1b: Other Methods**

If electrical and mechanical means of meeting or exceeding the goal of carbon neutrality are required, then development should be encouraged to incorporate some, or all, of the following:

- A. maximising the use of renewable energy by using electrical heating and avoiding the use of fossil fuels.
- B. Introducing measures to reduce heat loss. This could include, where appropriate, double glazing in Conservation Areas or secondary glazing in listed buildings with wooden windows that meet the latest relevant British standard.
- C. Draught proofing and improved ventilation strategies with suitable forms of insulation and insulating materials that are compatible with building type, construction and traditional fabric that do not detract from historic characteristics.
- D. using heat pumps to extract heat from the air, ground, or nearby water.
- E. incorporating Solar photovoltaic panels on South or East/West facing roofs, where these do not detract from the historic character of the building and are not visible from public domain where they are allowed, if the building lies within the conservation area.
- F. Installing a battery to allow load shifting to take advantage of local and grid renewable generation.

#### **Policy SD2: Community Energy Projects**

**Community energy projects will be supported**

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<sup>38</sup> [https://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%202012\\_0.pdf](https://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%202012_0.pdf)

## Policy DQS1: Local Character

### Relevant Neighbourhood Plan Objective:

EO5 –To require new development to respond to local character, materials and colour palette corresponding to the SODC Design Guide and the Supplementary Technical Notes on local building materials.

EO7 – To conserve and enhance the unique historic and natural environment assets of the area which make an important contribution to the quality of new development, the economy and social infrastructure of the town and village whilst increasing their energy efficiency.

7.112. This policy aims to protect the character of Henley and Harpsden when planning for new development or redevelopment and reinforce the importance of the Conservation Areas. To meet the following objectives: EO5 –To require new development to respond to local character, materials and colour palette corresponding to the SODC Design Guide and the Supplementary Technical Notes on local building materials. EO7 – To conserve and enhance the unique historic and natural environment assets of the area which make an important contribution to the quality of new development, the economy and social infrastructure of the town and village whilst increasing their energy efficiency.

7.113. The Conservation Area Appraisal Management Plan (CAAMP) (Consultation Draft) identifies and provides analysis of the different character areas within the Conservation Areas.

7.114. The Character of the Area is articulated in the Conservation Area Appraisal Management Plan (CAAMP) and summarised in Figure 14.

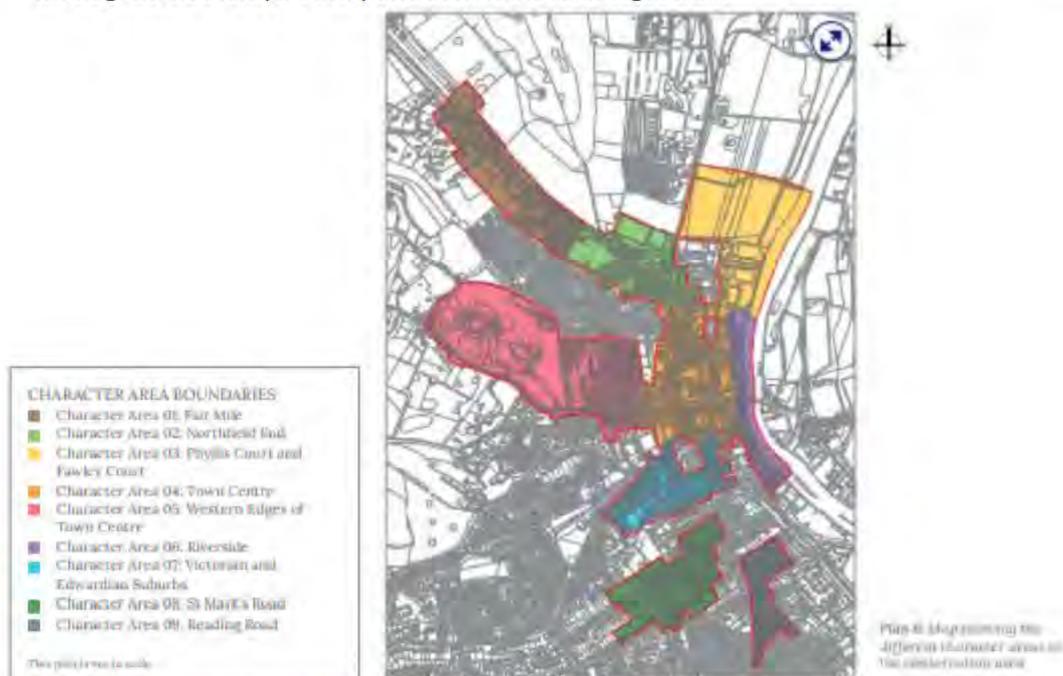


Figure 14 -Henley Character Area Boundaries)

7.115. Fair Mile (Character Area 1) features medium-sized plots comprising semi-detached or detached houses to the south-west and more dispersed development with buildings occupying larger and more irregular plots to the north-west. The character area developed

piecemeal as a residential area beyond the town centre and retains this function and suburban, edge of town character today. Due to the piecemeal development of this road, the buildings adopt a range of building materials and architectural features. Most houses, particularly those on the south west side of the road, are well-screened behind high masonry walls or mature hedges. The double tree-lined avenues either side of Fair Mile give the character area a verdant, leafy character. Fair Mile follows a valley down from the Chiltern Hills and its setting is therefore characterised by inclining slopes on both sides. Most houses are set within spacious gardens with trees, shrubs and grass lawns.



Detached villas in spacious plots along Fair Mile



Tall masonry blocks close to the town centre



Two-storey semi-detached houses towards the north-west end of the character area

7.116. Northfield End (Character Area 2) is the principal street in the character area, which is a continuation of Bell Street and curves to the north-west to become Fair Mile. It is therefore part of the key approach to the town from the north west. Bell Lane, the northern half of which is in this character area, is an ancient street, part of the medieval gridded street layout and originally leading all the way to the River Thames. The buildings in this character area are almost entirely residential with the exception of the Quaker Meeting House and a few retail units on the stretch of Northfield Road immediately to the north of King's Walk. The buildings in this character area typically range from two to three-storeys. The Victorian terraces are fine-grained and particularly diminutive in height, whilst the three-storey buildings of more substantial massing are generally modern, for example Fairmile Court. The predominant cladding material for historic buildings in the character area is red brick, although the brickwork to some buildings is rendered or painted white. Roofs are typically clay tiled although there are more recent buildings with slates; terraced roofs are pitched, whilst villas often employ hipped or half-hipped forms. Detached or semi-detached villas are characterised by regency-style classical lintels with reeded pilasters or porticos and features such as bracketed eaves. Terraced houses typically have simple flat or segmental door lintels supported on brackets. Timber-framed sash windows are typical. Characteristic of the closer to town centre location, the terraced rows are positioned hard against the pavement, whilst larger detached or semi-detached buildings are set behind small front gardens bounded by brick walls, hedges or railings or a combination of boundary treatments. Northfield End is characterised by mature street trees and grass verges, giving the character area a leafy, verdant character.



Dwellings and retail units at the south-west end of Northfield End



Quaker Meeting House



Two-storey terraced houses on Northfield End

7.117. Phyllis Court and Fawley Court (Character Area 3) is characterised by the large open spaces of the sports fields, historically part of the Fawley Court estate, and the grounds of the Phyllis Court Club. The principal buildings are the Phyllis Court Clubhouse and the Grandstand (Grade II) with the only other buildings being ancillary structures associated with the club. The Clubhouse is rendered and painted pale pink with cornice, window surrounds and string course picked out in white. The building is fronted by a range of glazed conservatories. Whilst the character area is largely green and features a number of trees, the playing fields and adjoining riverbanks form the only publicly accessible part of the character area. These open spaces are accessed via a footpath off Marlow Road.



The view of the river and Henley from the publicly accessible riverside



The Grandstand

7.118. Town Centre (Character Area 4). There is also good survival of the medieval, burgrave plot pattern comprising deep, narrow fronted plots, this is particularly distinct along Hart Street and the north side of Friday Street. There has been relatively little plot amalgamation, meaning the frontage widths are not hugely varied. Various narrow yards, courtyards, lanes alleyways and carriage arch passages run along the alignment of the burgrave plots to meet the main streets, particularly along Hart Street and New Street. These spaces enable views of the more varied rear elevations of buildings whose fronts have been refronted in the Georgian period. Market Place and Hart Street, which lie at the heart of the conservation area, are characterised by a largely commercial character with building uses including banks, retail and hospitality (hotels, pubs and restaurants). Most upper storeys are in residential or commercial use. The character area has a mix of two and three storey buildings. Buildings are generally fronted in red or grey brick, a combination of the two, or are rendered or painted white. There are several timber-framed, jettied buildings, others survive but concealed 18th or 19th centuries re-fronted. Roofs are pitched or hipped, and the roofline is further enlivened by a number of gable ends. The most historic buildings use clay tiles, although some later buildings make use of slate. Some roofs are concealed behind parapets, particularly those built or refronted in the Georgian period. Many ground floors are occupied by shopfronts, which are a mix of historic, traditional-style and modern. In some cases, where shopfronts have been replaced, certain historic features including pilasters and consoles or corbels still survive.



Ornamental terracotta and stained glass



Decorative polychrome brick



View looking east along Hart Street showing commercial buildings at ground level



The north end of Bell Street, which is more residential in character

7.119. Western edges of Town Centre (Character Area 5). The street and plot pattern are varied across the character area owing to its piecemeal development along Gravel Hill, Victorian residential infill and the large site of the former Henley Union Workhouse (Townlands Memorial Hospital). A large part of the character area is also taken up by the Friar Park estate, to the west. Gravel Hill has long served as an important approach to the town centre from the west and joins the Market Place at the Town Hall. This character area contains a mix of building uses although the predominant use is residential. Hop Gardens, West Street, King's Road, Clarence Road and York Road are largely residential in character with the land between Hop Gardens and the other streets occupied by Townlands Memorial Hospital and doctors' surgeries. The buildings along Gravel Hill and West Street are generally clad in red brick, sometimes combined with grey brick. Certain buildings have been rendered or painted pale colours. There are a few examples of timber-framed buildings or knapped flint. Architectural or decorative features include sash-windows, bay windows, door lintels and contrasting coloured brickwork to pick out window surrounds and banding.



Large-scale modern hospital buildings



Commercial buildings at the lower (east) end of Gravel Hill



Terraced residential development along King's Road

7.120. Riverside (Character Area 6) this character area is defined by the River Thames, with Thameside the main route in the area running parallel in a north-south arrangement with the riverside. Development in this character area is relatively fine-grained but less dense than that in the town centre, demonstrative of its post medieval development. The buildings generally form part of terraced rows broken up with small gaps between or converging roads. There are a range of building functions in the riverside character area. The mansion blocks at the south end of Thameside are tall four-storey buildings and some of the tallest buildings in the conservation area, whilst those to the north of the bridge, are smaller, typically two-storey buildings, some with attic accommodation. Those around the bridgehead are slightly taller at three-storeys. Red brick is the predominant cladding material in this character area, sometimes used in conjunction with grey brick. The brickwork to some buildings is painted. Stucco or render is also popular, particularly for the regency row of River Terrace (Grade II), at the south end of Thameside.



View of the north end of Thameside from Henley Bridge

7.121. Edwardian Suburbs (Character Area 7) has a transitional character connecting the historic medieval core of the town with the Edwardian suburbs to the south. The principal routes are Reading Road, the principal approach from the south and Greys Road and important south-west approach to the town. Both these routes are historic and were built up prior to the Victorian period. The street pattern between these two roads is irregular and piecemeal in its evolution, mainly developed in the Victorian and Edwardian periods. The character area primarily consists of residential uses, although Reading Road contains a mix of residential and, to the north towards the town centre, commercial uses. The scale of the residential buildings in this character area is typically two-storeys, reflecting their domestic function, although the detached dwellings on Norman Avenue are larger, three-storey buildings with wide frontages and deep proportions. Red brick is the predominant building material in the character area, sometimes used alongside grey brick. Yellow brick is also used to articulate red brick elevations in some residential streets particularly Albert Road and Queen Street, where it has been used for banding and other detailing around windows. The brickwork to some buildings is painted or rendered, although where this occurs in a terrace disrupts the uniform appearance of the row. Roofs are generally pitched or gabled and are typically slate-tiled, except a number of older buildings which feature clay tile.



Small residential buildings on Reading Road and taller commercial buildings closer to the town centre in the background.



Eclectic style of houses on Norman Avenue



The large-scale Imperial Hotel and associated buildings



Detail of terrace with decorative brick banding and name plaque

7.122. St Mark's Road (Character Area 8) is formed by parallel streets laid out in the late 19th/early 20th century to form a middle-class suburb. The detached and semi-detached houses were designed to occupy spacious plots, which became more generous to the south-west, away from the town centre. Whilst there has been some infilling, the suburb is clearly distinct from the more urban environment of the town centre, retaining a unique, spacious, leafy and airy character. The area is characterised by wide roads lined by deep, wide-fronted plots with semi-detached or detached dwellings. The area is almost entirely residential with the exception of St Mary's School on St Andrew's Road. The buildings are typically two-storeys, although some have additional attic accommodation, and a small proportion are three full storeys. The buildings in the character area are generally finished in red brick, although some have stone fronts or rendered detailing. Roofs, which are pitched and sometimes gabled, generally feature slate tiles although some are clay. The streets in this character area, particularly St Mark's Road and St Andrew's Road, are lined with mature plane

trees. The avenues contribute to the leafy suburban character of the area, although some sections of avenue have been lost over time. Most dwellings feature treed and well-planted front gardens, bringing leafy verdant and suburban character.



St Mark's Road looking east showing street trees, well-planted front gardens and a wooded landscape beyond (Henley)



St John's style tiled roof

Turret feature at St Mary's School



Villa with a castellated parapet

7.123. Reading Road (Character Area 9) is the principal and historic approach route to Henley from Reading to the south and bisects this character area. Terraced houses were developed along Reading Road at the turn of the 20th century. Although the plots along Reading Road are slightly more generous, plot sizes within this character area are largely uniform and of a fine grain with narrow-fronts and small gardens to the rear. This area was developed as a working-class residential area and remains almost entirely residential in function. The buildings within this character area are domestic in scale and of a consistent two-storey height. Stylistically, the buildings within this character area are very similar. Buildings are all finished in red brick and feature pale-yellow brick detailing for banding and door and window surrounds. A few buildings have been rendered or painted white or off-white, but this is out of character historically and disrupts the uniform appearance of the area. The residential terraces feature mixed boundaries but generally comprise low brick walls, with some metal railings, enclosing small front gardens.



Decorative 'dentils' above windows and moulded surround to the 'Knobley Street'



New 'Club' TV centre at the foot of road at the 'Clubfoot' - a building which is a landmark in the area.

#### Policy SD3: Local Character

Proposals for new development or the redevelopment of existing buildings should contribute towards the local distinctiveness of Henley and Harpsden. They should demonstrate high quality, sustainable and inclusive design and architecture that respects the relevant Character Area, as demonstrated in the CAAMP.

- a. 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.

- b. For each of the respective Character Areas identified on the Policies Map, proposals should respect the design, use of materials and views identified in the Character Area. The Character Areas, as shown in the Conservation Area Appraisal, are: Area 1 ('Fairmile'); Area 2 ('Northfield End'); Area 3 ('Phyllis Court and Fawley Court'); Area 4 ('Town Centre'); Area 5 ('Western Edges of Town Centre'); Areas 6 ('Riverside'); Area 7 (Edwardian Suburbs'); Area 8('St Mark's Road'); Area 9 ('Reading Road').
- c. High quality materials should be used that respect the local setting and contribute positively to the particular Character Area or Conservation Area or the general surrounding area if outside of these designations.

## Appendix A – Climate Emergency Focus Group



### **Henley and Harpsden Neighbourhood Plan: Report on 12 November 2020 Climate Emergency Focus Group**

#### **Introduction**

Henley Town Council and Harpsden Parish Council are updating their Neighbourhood Plan (NP). Community First Oxfordshire (CFO) has been commissioned by the NP Steering Committee to assist with the community consultation strategy, engaging with residents about current and future issues facing the town. Due to the current COVID-19 situation, it has not been possible to hold the usual public-facing engagement activities.

In summer 2020, CFO held two Zoom Focus Groups (a separate report is available). One of the main follow-up actions from these sessions was to arrange a Focus Group focusing on the Climate Emergency.

To this end, all community groups were contacted by e-mail in October 2020 inviting them to sign-up for a Climate Emergency Focus Group. These invitations were followed up with telephone conversations and further emails. There was also use of social media and community websites, inviting the general public to participate.

**17 individuals signed-up to take part in a Focus Group, with 15 subsequently attending the event from 7 – 8.30 pm on 12 November 2020.**

#### **Focus Group Aims**

The key aims of the Focus Group were to:

1. - 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.

#### **Focus Group Process**

The session was facilitated by Tom McCulloch (discussion lead) and Hilary Lombard (notetaker and summariser) from Community First Oxfordshire.

Discussion themes were not prescribed in advance. 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.

#### **DISCUSSION THEME 1**

##### **Why is the climate emergency important to you?**

##### **Summary**

Most people expressed concern about the negative legacy that would be left for future generations if the climate crisis is not adequately addressed. Several attendees described how they were changing/

had changed their own behaviours to minimise their personal climate impact and make a difference now.

The impact of a 3 degree rise in temperature was discussed. The current older generation's grandchildren are likely to be alive at the end of this century and would be impacted by this. This was a general concern.

There was general discussion and agreement about the need to protect the environment and encourage biodiversity.

It was explored how local children benefit from volunteers going into schools giving presentations on the issue. The students are very engaged and have a good understanding of the issues, however, this needs to be extended to more students and schools.

#### **QUOTE**

*'I speak to one person a day about the issues. Teenagers are good to talk to as they will inherit this world.'*

#### **DISCUSSION THEME 2**

**How would you describe wider community interest and engagement regarding the Climate Emergency?**

##### **Summary**

There was general agreement that there needs to be more education and wider communication about the climate emergency, as well as other environmental issues (the use of herbicides and pesticides was noted for example). It was discussed how people see things from different perspectives and this needs to be considered.

In addition, it was felt that while most people are aware of these issues, often they feel overwhelmed and do not know what to do on a personal level. Furthermore, there is a limit on what individuals can do without an overarching strategy/ policy from government. It was also pointed out that it needs to be made clear that we are facing not only a climate emergency but an ecological one as well.

On the other hand, it was suggested that people didn't really know what they should do to address climate etc. issues and the NP should be used to set out just what they could, with real-life examples.

#### **QUOTE**

*"People get worked up about hedgehogs and not insulating their homes as that costs money"*

It was also felt by two attendees that that Henley Town Council should take more of a lead in positively responding to the climate issue, for example, by making the point about the need to encourage biodiversity when faced with complaints about overgrown paths.

Attendees also discussed the complexity of the planning system and how many people find the system difficult to understand and navigate. In particular, people need to be clear which Local Authority (County, District, Town or Parish) deals with which issue and how much local people can influence.

It was also considered how Henley TC and Harpsden PC have limited control over certain issues, such as the cutting down of trees. Nevertheless, despite this, the councils can play a role in highlighting the importance of issues like these with residents and working to address them. In addition, Henley TC owns land in the town and therefore can control how it is used. The council's 'general power of competence' is additionally useful.

The Area of Outstanding Natural Beauty was mentioned, particularly in relation to how it restricts the ability to undertake certain renewable energy projects. Opinion was expressed that the AONB plan should be adapted in order to better respond to the climate emergency, perhaps by allowing appropriate alternative energy development projects.

### **DISCUSSION THEME 3**

***Do you think there's a perception that some ideas and opinions about the Climate Emergency are too radical and some people are scared off?***

#### **Summary**

There was a discussion about short-termism and how policies, strategies, behavioural change need to look to the long-term to adequately address the climate emergency.

It was felt by some attendees that most people consider the Climate Emergency to be an inconvenience and live only in the 'here and now'. It was discussed that the effects of climate change have not affected us in northern Europe as much as other parts of the world (although the increasingly frequency of flooding and extreme weather events in the UK was noted). Therefore, when people do realise the urgency it may well be too late.

There was then discussion about how best to communicate the issues and suggested actions relating to the Climate Emergency and what to do about it. It was explored how it is important that instead of just 'preaching at people and telling them what to do' that people are advised about what's doable and showing 'what's in it for them', by showing how taking certain actions can save them money and making clear what financial support might be available to support certain innovations and changes. The need to make better use of the following communication and advocacy channels was also explored: social media on all platforms; polls; going into schools; and making the case within businesses and organisations.

#### **QUOTE**

*"The challenge is a long-term issue and most people do not think that way. We need to make people aware of the fact their behaviour now is important"*

#### **DISCUSSION THEME 4**

##### ***Do you think the climate issue is championed enough by South Oxfordshire District Council?***

###### **Summary**

There was discussion about the current situation with SODC's emerging local plan, and it was noted that the Planning Examiner had added policies about the Climate Emergency and that these should be exploited to the Neighbourhood Plan's advantage.

However, concern was also expressed that both SODC and the County Council were not doing enough in relation to the Climate Emergency and that 'we need to take more local action.'

#### **DISCUSSION THEME 5**

##### ***How should the NP refresh respond to the Climate Emergency in terms of vision, objectives, and specific policy themes?***

###### **Summary**

###### **Vision and objectives**

There was consensus that the Climate Emergency needs to be at least the golden thread throughout the NP, if not be the starting point for the whole of the plan. Every policy should be checked against its influence on the climate.

In terms of the golden thread, this would mean that the Plan specifically set out the things that need to be done to address the Climate Emergency: 'from transport and having an infrastructure of charging points through to retrofit, through to renewable energy and tree planting.'

However, opinion was expressed that some people could be turned off if the plan was seen *purely* as 'the Climate Emergency plan'.

There was also an argument put forward that all the work and thinking taking place on sustainable transport, biodiversity, retrofit etc. in the community currently 'wasn't joined up', which was somewhat dissipating the impact of an overall local strategy to respond to the Climate Emergency – the NP could help in this regard.

###### **QUOTE**

*"Every policy of the Neighbourhood Plan should take the climate crisis into account."*

Other suggestions for how the NP could be used to meet a zero carbon agenda included the provision and encouragement of the following themes as a priority: encouragement for walking and cycling; alternative energies; green infrastructure and biodiversity; and the transition to a low carbon economy.

It was felt that NP policies should be written to encourage new development (whether on allocated sites, through windfall development or infill development) to proactively mitigate climate change, and encourage biodiversity, environmental protection etc. 5

###### **Housing**

Attendees felt strongly that the new developments, including social housing, should provide zero carbon homes. Houses should use less concrete and offer electric vehicle charging points. It was felt that itemising the cost of renewables would be helpful as new energy sources can be cheaper than traditional ones.

An attendee noted that a builder in Kingston Bagpuize built new carbon neutral homes at a cheaper price than a standard home and this was something that could be usefully explored. There followed discussion about how resources are limited and these need to be used wisely when looking at both new and existing housing.

It was also very important that tenants and homeowners need to be able to retrofit, with one attendee setting out some indicative costs of £30-40k per house, which 'will not be easy'.

### **Design and character**

There was also discussion about how a NP design and character policy could ensure development in keeping with the local area. This could be particularly useful in terms of preventing the removal of traditional hedges, for example. Concern was also expressed about the loss of trees as a result of development and sometimes during house sales. Therefore, a policy NP could be investigated regarding tree conservation.

### **Home-working hubs**

It was felt, particularly given recent changes with working patterns and arrangements with the pandemic, that a forward-thinking policy would be to provide 'hubs' in public spaces for home working.

### **Sustainable food and biodiversity**

Other projects that could be investigated via the NP included the provision of allotments and a community orchard.

## **Next steps and recommendations**

### **Neighbourhood Plan Policies**

The Climate Emergency and ecological etc. ambitions of the Henley and Harpsden Neighbourhood Plan refresh may well go beyond those set out in the emerging South Oxfordshire District Council Local Plan. However, a 'limiting' factor in the NP is that it must be in general conformity with the strategic policies contained in the development plan for South Oxfordshire. Therefore:

Recommendation 1 – discussions should be sought as early as possible with SODC Planning Officers to explore the ambition and extent of emerging NP policies and measures relating to the Climate Emergency etc.

### **Wider community engagement**

Some of the opinions expressed in the Climate Emergency Focus Group are strongly held. Many are powerfully argued. However, the Neighbourhood Plan needs also to take into account wider community opinion on this issue (and others) and can do so via additional consultation methods:

Recommendation 2 – questions on the Climate Emergency and related issues should be asked in the community-wide NP survey currently being drafted (November 2020)

Recommendation 3 – 'collective' responses on the range of NP themes, including the Climate Emergency and related issues, should be sought from the range of community organisations and institutions in Henley and Harpsden as part of overall NP opinion and evidence gathering strategy.

**Tom McCulloch and Hilary Lombard**  
**November 2020**

R and institutions in Henley and Harpsden as part of overall NP opinion and evidence gathering strategy.

**Tom McCulloch and Hilary Lombard**

**November**



Joint Henley and  
Harpsden  
Neighbourhood Plan

Topic Paper 2

# Housing

*September 2021*



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## 8. Disclaimer

- 8.1. 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. It is intended to provide an insight into how the plan has climate and environmental issues as a golden thread throughout the document.
- 8.2. 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.

## Wanted – Your Views

- 8.3. Henley Town Council and Harpsden Parish Council invites representations on its Draft Neighbourhood Development Plan (known as the “Joint Henley and Harpsden Neighbourhood Plan” (JHHNP)). This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 as amended.
- 8.4. The consultation period runs from 20 September 2021 to 1 November 2021.
- 8.5. During this consultation we are consulting on the draft plan and associated evidence base. The Neighbourhood Plan Committee wants to gather the views of all stakeholders, particularly those who live, work, or do business in Henley and Harpsden.
- 8.6. 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.
- 8.7. 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 to do this?

- 8.8. All responses to this consultation must be received prior to the end of the consultation period which is midnight on 1 November 2021. Responses must include a name, address and - if relevant - the organisation you are representing.

**We would prefer it at all possible that comments are made using an online feedback system – you can do this at: <https://jhhnp.org.uk/>**

- 8.9. However, you can also collect a hard copy of the feedback form from Henley Town Hall. Please return your completed form to the location you collected it from.

## Purpose

- 8.10. The purpose of this topic paper is to look at available evidence in terms of housing needs of the Neighbourhood Plan Area and explain the site assessment and site selection process.
- 8.11. 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.
- 8.12. The background papers are:
- Paper 1 - Environmental, Sustainability and Climate Change
  - Paper 2 - Housing
  - Paper 3 - Retail, Town Centre and Economy
  - Paper 4 - Transport
  - Paper 5 - Infrastructure
- 8.13. These background papers can be downloaded from the Joint Henley and Harpsden Neighbourhood Plan website.

## 9. Introduction

- 9.1. Henley Town Council and Harpsden Parish Council are preparing a new Neighbourhood Plan. This will set out the key elements of the planning framework for Henley and Harpsden covering the period 2020 to 2035. Once 'made' it will replace the existing Joint Henley and Harpsden Neighbourhood Plan (JHHNP) which came into force in April 2016.
- 9.2. The review is necessary due to the requirements set out in the new South Oxfordshire District Council Local Plan which was adopted in December 2020. This includes delivery of new homes and employment land, meeting affordable housing needs and addressing environmental issues such as air quality. The Neighbourhood Plan needs to be reviewed to ensure it is up to date and able to continue strongly influencing planning decisions.
- 9.3. The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Henley and Harpsden, that is the South Oxfordshire Local Plan. Throughout the document, for each Neighbourhood Plan policy, the relevant policies from this plan are referenced.
- 9.4. The Evidence Base will mirror the sections of the NP to enable easy read-across between each policy and the evidence underpinning it. Hence, as with the NP, each theme has its own chapter, subdivided into the objectives, supporting text and finally the policies themselves.
- 9.5. Evidence has been compiled from a number of sources:
- Extensive engagement with the community and local stakeholders including through focus groups, leaflet drops, local surveys and online representations.
  - Compilation of statistics and facts from existing documents and reports relating to Henley and Harpsden.

## Vision & Objectives

9.6. The vision statement for the revised Plan states that: **“In 20 years’ time, Henley on Thames and the surrounding village of Harpsden will have a sustainable community, meeting the needs of current and future generations who live and work here and for visitors where possible. The community will be resilient in its capacity to address the likely impact of climate change whilst still protecting the special qualities of the area.”**

9.7. The revised Neighbourhood Plan includes the following housing objectives:

- HO1 - Identify land for new housing as required by the South Oxfordshire Local Plan Policy H3 Local Plan.
- HO2 - Ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other.
- HO3 - Prioritise the redevelopment of brownfield sites, and intensification of use of existing land where appropriate.
- HO4 - Deliver an appropriate range and mix of housing to achieve a balanced community and in particular help meet the needs of those age and income groups who have difficulty finding homes in Henley.
- HO5 - Explore opportunities to address local needs and maximise affordable housing delivery.
- HO6 – Ensure that developments are sensitively integrated into new and existing developments, promoting the amenity of all and sympathetic to existing housing.
- HO7 – Encourage new developments to sustain the significance of heritage assets and be sensitive to their settings.
- HO8 - Deliver an appropriate mix and tenure of housing including First Homes.

## Planning Context

### Local Plan

9.8. The current development plan for the Neighbourhood Plan Area is the South Oxfordshire District Council Local Plan. This Plan sets out the requirement for the Neighbourhood Plan.

9.9. Policy H3: Housing in the Towns of Henley-on-Thames, Thame and Wallingford

9.10. A minimum housing requirement of 3,873 homes will be collectively delivered in the towns of Henley-on-Thames, Thame and Wallingford as follows:

- i) Henley-on-Thames: at least 1,285 homes
- ii) Thame: at least 1,518 homes
- iii) Wallingford: at least 1,070 homes

9.11. 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.

9.12. If a Neighbourhood Development Plan has not adequately progressed with allocating sites\* to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in that market town will be supported provided that proposals comply with the remainder of the policies in this Development Plan.

\* the Plan has reached submission stage and has allocated sufficient housing sites.

### National Planning Practice Guidance

9.13. The Planning Practice Guidance states that ‘housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability.... and preparing policies to address this such as site allocations’

## 10. Latest Housing Figures

10.1. The South Oxfordshire District Council Local Plan 2035 sets out the housing supply required made up from several sources including; Strategic allocations, retained Core Strategy and Local Plan 2011 allocations, existing planning commitments, small scale (non-strategic sites) to be identified through Neighbourhood Development Plans or identified in the emerging Plan where Neighbourhood Development Plans are not being progressed and sites not yet identified (windfalls) that will come forward through the development management process.

10.2. The Local Plan proposes an additional 15% housing stock to 2011 in the market towns including Henley-on-Thames. An additional 1,285 dwellings are proposed for Henley-on-Thames to 2035 (completed and committed total).

10.3. Table 4d: Provision of homes at NPA (As of 1 April 2020)

|   |      |
|---|------|
| Core Strategy + 15% growth              | 1285 |
| Completions and commitments*            | 1170 |
| Minimum outstanding requirement for NDP | 115  |

\* Completions and commitments as of 1 April 2020

10.4. On the date that the Plan is likely to be examined, part of the outstanding housing requirement will already have been built (Completions). A further quantity will have planning permission but will not have been built (Commitments). As of 1 April 2021, an additional 46 dwellings had been provided towards the Housing Requirement.

10.5. The following table shows that the outstanding requirement to be identified through the Neighbourhood Plan currently stands at 68 dwellings.

10.6. Table 1b: Provision of homes at NPA (As of 1 April 2021)

|   |      |
|---|------|
| Core Strategy + 15% growth              | 1285 |
| Completions and commitments*            | 1216 |
| Minimum outstanding requirement for NDP | 69   |

\* Completions and commitments as of 1 April 2021

## 11. Housing Needs Assessment

11.1. A Housing Needs Assessment was completed by AECOM in 2020. This suggests that Henley and Harpsden will require an additional 527 affordable rented homes and 800 affordable home ownership dwellings over the Plan period.

11.2. AECOM's review of the Strategic Housing Market Assessment (SHMA) suggests that the Affordable Housing need identified is focused on households living in unsuitable housing and unable to afford to rent in the market. The SHMA does not quantify the need (or rather, potential demand) for Affordable Housing from households who can afford to rent but cannot afford to buy and would prefer to do so. This is because such households who can afford to rent in the open market but cannot afford to buy were added to the NPPF definition of those in need of Affordable Housing since this SHMA was published in 2014.

11.3. In order to provide an estimate for those who cannot afford to buy in the market in Henley and Harpsden, to complement the SHMA's calculation for those who require affordable rented products, AECOM has produced an additional estimate as shown in the table below.

Table 4-5 : Estimate of the need for affordable home ownership housing, Henley and Harpsden

| Stage and Step in Calculation                      | Total        | Description   |
|--|--------------|---|
| <b>STAGE 1: CURRENT NEED</b>                       |              |   |
| 1.1 Current number of renters in NA                | 1,024.36     | Census 2011 number of renters x national % increase to 2018                 |
| 1.2 Percentage renters on housing benefit in LA    | 13.40%       | % of renters in 2018 on housing benefit (based on LA proportion)            |
| 1.3 Number of renters on housing benefits in NA    | 161.40       | 1.1 x 1.2   |
| 1.4 Current need (households)                      | 782.22       | Current renters minus those on HB and minus 25% assumed to rent by choice   |
| 1.5 Per annum                                      | 52.15        | 1.4/ plan period  |
| <b>STAGE 2: NEWLY ARISING NEED</b>                 |              |   |
| 2.1 New household formation                        | 665.79       | LA household projections for plan period (2014 based) pro rated to NA       |
| 2.2 % of households unable to buy but able to rent | 15.05%       | Current % of households in PRS  |
| 2.3 Total newly arising need                       | 100.20       | 2.1 x 2.2   |
| 2.4 Total newly arising need per annum             | 5.57         | 2.3/ plan period  |
| <b>STAGE 3: SUPPLY OF AFFORDABLE HOUSING</b>       |              |   |
| 3.1 Supply of affordable housing                   | 88.53        | Number of shared ownership homes in NA (Census 2011 + new build to 2018/19) |
| 3.2 Supply - intermediate resales                  | 4.43         | 3.1 x 5% (assume rate of re-sale)   |
| <b>NET SHORTFALL (OR SURPLUS) PER ANNUM</b>        |              |   |
| <b>Shortfall (per annum)</b>                       | <b>53.29</b> | <b>Shortfall = (Step 1.5 + Step 2.4) – 3.2</b>                              |

Source: AECOM model, using Census 2011, English Housing Survey 2018, CLG 2014 based household projections and net additions to affordable housing stock. Figures may not sum due to rounding.

- 11.4. South Oxfordshire District Council (SODC) have adopted a new local plan 2011-2035. The housing requirement set out in the Local Plan equates to 775 homes per year over the plan period, which constitutes an uplift on the housing requirement generated by the standard method, particularly taking into account the 2014 Strategic Housing Market Assessment (SHMA)<sup>39</sup>, the Oxfordshire Housing and Growth Deal and the approach taken by the other Oxfordshire Local Authorities in their adopted Local Plans. It is proposed that the plan could enable delivery of up 12,048 affordable homes (justified by viability evidence) largely through the provision of seven strategic sites within South Oxfordshire.
- 11.5. The Housing Delivery Strategy recommends that South Oxfordshire District Council could consider increasing the requirement of affordable rental properties on new development sites in areas of high demand such as Henley.
- 11.6. The Local Plan will be meeting the housing needs of Henley and Harpsden and this will be largely down to a percentage requirement of affordable homes in mixed market-led schemes as set out in Policy H9. For all major developments (10 or more homes), the policy requires housing sites to deliver 40% affordable housing on site. For sites in the Areas of Outstanding Natural Beauty, proposals for 5 or more homes will provide a financial contribution equivalent to 40% affordable housing provision, but for sites of 10 or more, this would be provided on site.

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[https://data.southoxon.gov.uk/ccm/support/dynamic\\_serve.jsp?ID=1038255624&CODE=DEBC6A309FBCBBF6F16E378EF9002410](https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1038255624&CODE=DEBC6A309FBCBBF6F16E378EF9002410)

- 11.7. The Housing Needs Assessment recognises this and also suggest that there may be some overlap at the margins.
- 11.8. The strategy of the Local Plan was found sound including the strategy for identified growth for Henley.
- 11.9. The recommended tenure split for Henley and Harpsden, based on the HNA and South Oxfordshire evidence, is to maintain that set out in district level policy: 40% affordable rented, 35% social rented and 25% other affordable routes to home ownership as set out Policy H9 of the Local Plan.
- 11.10. Since the adoption of the Local Plan, the government have realised a ministerial statement on 24 May 2021 requiring First Homes; a specific kind of discounted market sale housing which should be considered to meet the definition of ‘affordable housing’ for planning purposes. Specifically, First Homes are 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 (or £420,000 in Greater London).
- 11.11. The NPC will seek opportunities to maximise meeting these needs. The Committee will consider the most suitable sites for Henley and Harpsden, applying additional site assessment criteria, considering feedback from residents and looking at the wider impact of sites, taking into account constraints to growth such as infrastructure capacity and provision.

## 12. Past Performance on Affordable Housing Delivery

- 12.1. The AECOM estimates of the potential supply of Affordable Housing stand in contrast to the reality experienced in Henley and Harpsden in recent years. SODC state that the number of Affordable Housing units delivered in Henley and Harpsden between April 2011 and March 2019 was just 14, all of which were shared ownership. The number of Affordable Housing units committed for future delivery as of April 2019 is only 16 – 12 of which will be for affordable rent and 4 for shared ownership are expected to complete in the 2019/20 period.<sup>40</sup>
- 12.2. That equates to a past effective delivery rate of 4% and an expected delivery rate of 2%, compared with the 40% requirement set out in SODC’s planning policies. This may be due to a high proportion of small infill sites that do not meet the size threshold needed for that policy requirement to apply. It may also be due to developments of residential

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<sup>40</sup> Should note that these are records from Henley and doesn’t include Harpsden.

institutions (Use Class C2) coming forward without requiring contribution to affordable housing.

12.3. It should be noted that proposed the Local Plan sets out a requirement for 40% affordable housing in respect of all developments within Use Class C2 where the site is delivering a net gain of 10 or more self-contained units which should help to deliver more affordable housing. There is affordable housing expected at the Thames Farm and Highlands Farm sites which should be delivering 103 affordable units, of which 77 will be for affordable rent.

12.4. The following table provides an updated delivery of affordable housing and the potential forecast.

| Site   | Affordable Rented | Shared Ownership |
|--|-------------------|------------------|
| <b>Completed</b>                             |                   |                  |
| Highlands Farm (1), Rotherfield Greys        | 41                | 8                |
| 116-118 Greys Road, Henley                   | -                 | 5                |
| Wilkins Yard, Henley                         | -                 | 9                |
| Townlands Hospital, Henley                   | 12                | -                |
| <b>Forecast/potential upcoming</b>           |                   |                  |
| Land West of Fairmile, Henley                | 22                | 7                |
| Anderson House, Henley                       | 0                 | 8                |
| Wyevale Garden Centre, Harpsden              | 12                | 4                |
| Highlands Farm (1), Rotherfield Greys        | 8                 | 8                |
| Highlands Farm (2), Rotherfield Greys        | 8                 | 3                |
| Thames Farm, Reading Road, Lower Shiplake    | 28                | 10               |
| Land to East of Reading Road, Lower Shiplake | 20                | 6                |

According to our records, there have been a total of **75** affordable homes delivered in the last five years, with **53** of these being for affordable rent and **22** being shared ownership.

Including applications that are currently pending or have some form of permission, possible forecasted units stand at **144**. **98** of these units for affordable rent and **46** for shared ownership. However, as you can appreciate, these may change.

## 13. Housing Needs Survey

13.1. In order to carry out the Community Survey, a publicity flyer was delivered to all residents in Henley and Harpsden in December 2020 - January 2021. Residents were invited to respond to the Community Survey via a Survey Monkey internet link. A number of hard copy responses were also received (and inputted) from those residents who did not have

access to the internet. The survey deadline was 8 February 2021 and 771 survey responses were received.

13.2. The survey included questions about housing for the Neighbourhood Plan Area. A copy of the questionnaire is available on the neighbourhood plan website.

13.3. The Survey results are shown in Appendix A. Key points are:

- A total of 244 people stated that they would require a house in the next 10 years.
- Those in detached houses were in the most need to move house.
- The majority of those who have a housing need do not require specialist housing.
- The preferred tenure to meet housing need 'Housing for sale at a lower price' with 73% of respondents selecting this option.
- Most respondents require a 2 or 3 bed property.
- The majority of respondents (42%) want a detached home.
- 39 people currently renting wanted to buy a new home but couldn't afford to.

13.4. 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.

## Housing policies for Joint Henley and Harpsden Neighbourhood Plan

### **Policy H1: Design Brief**

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 in accordance with the principles set out in the Design Brief. Applicants should seek to discuss the content of the Design Brief with Henley Town Council and where appropriate Harpsden Parish Council. Where appropriate the Design Brief should demonstrate consideration of :

- I. Location, type and management of open space and recreation facilities.
- II. Location, type and management of landscaping.
- III. Management, impact and mitigation of views, vistas and adjacencies.
- IV. Building use, scale, height, density and massing.
- V. Materials palette.
- VI. How the development responds to local character.
- VII. Connecting walking and cycling routes.
- VIII. Promotion of sustainable development and energy efficiency

### **Policy H2: Affordable Housing**

In addition to the requirements for affordable housing set out in the Local Plan Policy H9, at least 25% of 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.

**Policy H3: Housing Type and Mix**

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.

**Policy H4: Infill and Self-Build Dwellings**

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.

## 14. Site Selection Process

14.1. The NPC have considered all potential sites and made choices about which sites to allocate and for what purpose. Not all the sites put forward to the NPC through the Call for Sites have been considered suitable or are required to meet development's needs. The site assessment process is explained in the next section.

### Site Assessment Process

Stage 1: Review of existing JHHNP allocated sites

Stage 2: Identification of new sites

Stage 3: Site Assessment by AECOM

Stage 4: Sites rated green or amber by AECOM shortlisted

Stage 5: Public engagement to consider 15 sites

Stage 6: Considering further site suitability criteria

Stage 7: Sites selected as preferred options for Pre-Submission PI

14.2. The Joint Henley and Harpsden Neighbourhood Plan was made in 2016, which included 11 site allocations. The following table shows the existing sites allocated in the JHHNP and their current status:

| Site Name                                 | Allocation  | Status   |
|---|---|--|
| Land West of Fair Mile (Site A)           | Around 60 dwellings   | Planning Application currently being decided for 72 units    |
| Mill Lane former Jet Garage (Site H)      | Around 55 dwellings   | 53 Assisted Living Extra Care apartments delivered           |
| Wilkins (Site U)                          | Around 20 dwellings   | 23 dwellings delivered                                       |
| Highlands Farm (Site M)                   | Around 170 dwellings as part of the mixed use development of the site | Planning Permission Granted and currently under construction |
| 357 Reading Road (Site J)                 | Around 30 dwellings   | Assessed by AECOM for 50 dwellings                           |
| Gillotts School (Site C)                  | Around 50 dwellings   | Assessed by AECOM for 80 dwellings                           |
| TA Centre (Site V)                        | Around 10 dwellings   | Allocated  |
| Chiltern's End (Site F)                   | Around 27 dwellings   | Assessed by AECOM for C2 use                                 |
| Stuart Turner and Empstead Works (Site E) | Around 42 dwellings as part of the mixed use development of the site  | Allocated  |
| 118 Greys Road (Site Z)                   | Around 13 dwellings   | 16 dwellings delivered                                       |
| Henley Youth Club (Site C)                | Around 23 dwellings   | Assessed by AECOM for C2 use                                 |

## 15. Identification of Suitable Sites

### 15.1. Call for Sites

15.2. As part of the early engagement stage of the revised Neighbourhood Plan, a 'call for sites'; was undertaken between 18 April 2019 - 18 July 2019 to establish which sites land developers and other interested parties wished to be considered for development through the revised Plan. This was publicised on the JHHNP website and asked to fill in a form to ascertain their intentions for the land. A total of 18 new sites were put forward for consideration for various proposed uses at this stage. The NPC continued to receive site suggestions (NEW1 and NEW2) after the official call for sites, and these were accounted for.

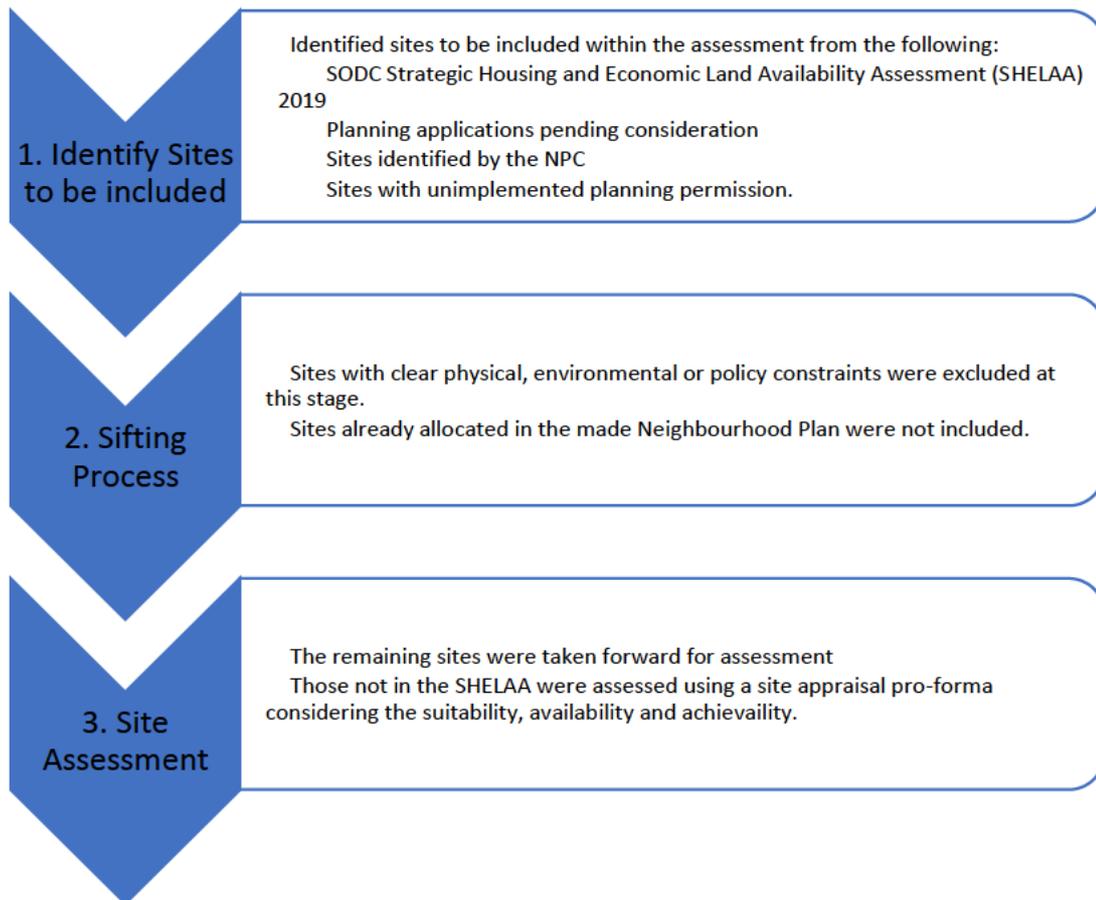
### 15.3. AECOM Site Assessment

15.4. AECOM conducted an independent site assessment for the Joint Henley and Harpsden Neighbourhood Plan (JHHNP) as part of the Locality and MHCLG Neighbourhood Planning programme.

15.5. The approach undertaken by AECOM in the site appraisal was based on the Government's National Planning Policy Framework (2019) and associated National Planning Practice Guidance. The uses the following methodology.

15.6. AECOM produced a report including 35 sites identified following the original Call for Sites 2019 and completed an addendum in 2020 which included 2 new sites and 3 sites for different proposals than assessed in the original Site Assessment. AECOM produced a second addendum in 2021 with 3 additional sites.

15.7. The AECOM methodology for choosing sites to assess can be summarised as follows:



15.8. The Site Assessment by AECOM included the assessment of 41 sites identified through the Neighbourhood Plan Call for Sites and the 2019 SHELAA. The site assessment found that 9 sites were free from constraints or have constraints that could be resolved:

**Site 2 - Chiltern Centre:** The site is previously developed land within the built-up area of Henley, access to services and facilities in less than a five-minute walk. This site is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is within the extent of the built-up area. The site is suitable for allocation in the Neighbourhood Plan. The site would remain suitable 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.

**Site 5 – Land west of Fairmile:** the site is greenfield within the general built-up area of Henley, the surrounding land is an adopted allocation in the existing Neighbourhood Plan therefore would act as an extension of this allocation.

**Site 853a – Land at Highlands Farm:** 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.

**Site 1117 – Land East of A4155, Wyevale:** this site already has planning permission for 40 dwellings and is suitable to allocate for a further 20 dwellings as the principle of development is already established on the site.

**Site X – Former Youth Centre:** this site is included in the made Henley and Harpsden Neighbourhood and has been reassessed to change the allocation from housing to C2 residential institution which would not change its suitability for allocation. The conclusions in the evidence base for the made Neighbourhood Plan remain relevant. The site is assessed against emerging Local Plan Policy H1, which refers to housing including C2. In addition, this site meets Core Strategy Policy CSH4, emerging Local Plan Policy H13 and meets the requirements set out in the PPG on housing for older people. 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 calculation should be discussed with SODC.

**Site NEW1 – Land North of Crossways:** This site partially meets objectives in the NP as it does not contribute to coalescence between Henley and Harpsden however, it is a greenfield therefore does not meet the objective of prioritising brownfield. This site is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is within the built-up area. In addition, the adjoining site (site 1036) has planning permission and is under construction. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5 year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, the site is suitable for allocation in the Neighbourhood Plan subject to consultation with SODC.

**Site C – Playing Fields at Gillotts School:** The site is owned by Gillotts School and in use as a playing field. 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. The site area avoiding removal of existing trees is approx. 2.3 hectares. The proposed increase to 80 dwellings on the site would be a net density of approx. 46 dwellings per hectare, assuming 25% of the gross site is set aside for non-residential use required to support the development. This density is broadly in line with the made Neighbourhood Plan policy guidelines as set out in paragraph 5.8 and therefore would be an appropriate level of development, subject to detailed design and agreement with the Highways Authority (OCC) over access arrangements.

**Site F – Chiltern's End:** The site is located within the built up area of Henley and contains former care home buildings. It is understood the site closed in 2016 and has remained unused since. It is currently allocated in the Henley and Harpsden Neighbourhood Plan for residential use. With regards to C2 on this site, AECOM stated that if evidence of need or availability 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 availability and need come forward.

**Site J – 353-357 Reading Road:** Clearance of the site of existing buildings and diversion of a large number of utilities would mean high development costs therefore the viability of the scheme should be established before the site is allocated to ensure the housing delivery is achievable. If a development brief could demonstrate that the level of development was

achievable with respect to parking, open space and other requirements and the access arrangements designed to allow continued access for the retail delivery to the adjacent superstore, the site could be allocated for 50 dwellings in the revised Neighbourhood Plan. Therefore, the site is suitable for allocation in the Neighbourhood Plan subject to consultation with SODC.

- 15.9. A further 6 sites were considered potentially suitable and available (i.e. have not been ruled out entirely) but have constraints – some very significant – which mean they are less likely to be suitable for development. If these constraints could not be resolved or mitigated, they would not be appropriate for allocation. These were:

**Site 13 – Thames Poultry Farmhouse, Bolney Lane:** The site does not currently meet local policy as it is not within or adjacent to the built-up area however, the adjoining site (site 1036) has planning permission and is under construction which would change this. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5- year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, consultation with SODC would be required to determine whether development of the site would meet policy. In addition, the site has a current planning application on it for 3 dwellings which should be monitored. Therefore, the site is potentially suitable for allocation in the Neighbourhood Plan subject to consultation with SODC.

**Site 14 – The Bungalow, Green Acres, Harpsden Woods :** 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. The site does not currently meet local policy as it is not within or adjacent to the built-up area however, a site to the south (site 1036) has planning permission and is under construction which would change this. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5- year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, consultation with SODC on whether the site would meet policy would be required. Therefore, the site is potentially suitable for allocation subject to consultation with SODC.

**Site 949 – Henley College:** the site is split into two parts (not continuous). Both sites are currently occupied by Henley College and grounds. If the sites were available for redevelopment the parts that are most suitable are the previously developed areas that meet local policy and are well situated in relation to the town.

**Site 878 – Thames Farm (NE Corner):** This site is not in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is outside the built- up area. However, it will be in conformity once the two adjacent sites have been built out The site is potentially suitable for allocation in the Neighbourhood Plan. There are no major constraints, however conformity with policy relies on site 1117 being built out. The site's suitability would remain the same should the emerging plan become adopted policy.

**Site E – Stuart Turner/Empstead Works:** the site is a town centre previously developed site. However, it would have to demonstrate the existing employment use is no longer viable.

**NEW2 – Hallemead House, Woodlands Road, Harpsden:** This site is not in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is adjacent to rather

than within the built-up area. The site does not currently meet local policy as it is not within or adjacent to the built up area however, the adjoining site (site 1036) has planning permission and is under construction which would change this. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5 year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, consultation with SODC on if the site would meet policy would be required. In addition, given the narrow access road and potential landscape impact, the capacity of the site should be lower than Site 1036 and would be more appropriate at the lower density of around 10 dwellings per hectare. Therefore, the site is potentially suitable for allocation in the Neighbourhood Plan subject to consultation with SODC.

15.10. The remaining 26 sites (Site 1, 6, 11, 18, 19, 956, 939, 161, 988, 1262, 1261, 1260, 1259, 853, 1257, 827, 1255, 1126, 961, 197, 378, 163, 876, 1158, 1036 and 950) were not suitable for residential development and therefore not appropriate for allocation in the plan.

15.11. The Neighbourhood Plan Committee considered that two sites (6 and 1158) should be considered further due to the sites being promoted to provide affordable housing. It was later confirmed that site 1158 was not proposing more affordable housing than required through Local Plan policy H9.

15.12. Following the AECOM site assessment, it was confirmed by the landowner that site 949 was no longer available and therefore this site was not taken forward for further consideration.

#### Stage 4: Sites rated green or amber by AECOM shortlisted

15.13. This left 15 sites, those assessed as green and amber within the AECOM site assessment to be considered further. The site promoters for these sites were invited to attend public exhibitions within the Town Hall in order to provide the opportunity for the public to consider these sites.

#### Stage 5: Public engagement to consider 15 sites

15.14. A Site Assessment consultation event was held in Henley Town Hall on 2-3 July 2021. Attendees were invited to view the AECOM site assessments and complete the Site Assessment Feedback Form.

15.15. 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.

#### Response

- 219 Site Assessment feedback forms were received in hard copy and via the online survey.

- 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

The full Site Assessment Feedback report is available on the Neighbourhood Plan website: <https://jhhnp.org.uk/>

## Overview of findings

### Narrative summary – ALL SITES

- 15.16. 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.
- 15.17. 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.
- 15.18. 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.
- 15.19. 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.
- 15.20. There was also strong opinion regarding the potential impacts of developing several sites, which, while in Harpsden parish, are in close proximity to the parish of Shiplake. Such development would impact or strain the infrastructure, amenities and services in Shiplake (especially with regard to traffic and parking). It was felt that formal site assessment consultation should have been extended to Shiplake residents.

### Stage 6: Considering further site suitability criteria

- 15.21. The Site Selection Working Group met on the 26 August to identify the provisional development sites to be included as preferred options within the Pre-Submission Plan (Regulation 14) which will take place for a 6-week period starting in September.
- 15.22. The group considered the evidence, public feedback, objectives and strategy of the Neighbourhood Plan the Local Plan.

- 15.23. The 15 shortlisted sites were subject to the following additional site assessment criteria:
- Benefit to town: How the proposed site will bring wider benefits for the community and the town.
  - Loss of other beneficial use: Whether the proposed site would result in the loss of an existing beneficial use which is either not surplus to requirements or could not be replaced locally.
  - Climate emergency: How the proposed site will reduce carbon emissions and be resilient to the impacts of climate change.
  - Landscape Impact: Consider the impact of the proposed site on the landscape and key views.
  - Impact on roads: Evaluate the impact of the proposed site on the local roads - traffic etc.
- 15.24. Although it was originally proposed to assess the sites impact on air quality. It was considered, by the group, that this was not a specific site assessment criteria that could be undertaken at this stage. It was therefore agreed to remove this from the list of criteria.

#### Stage 7: Sites selected as preferred options for Pre-Submission Plan

- 15.25. The Site Selection Working Group met on the 26 August 2021 to identify the provisional development sites to be recommended to Neighbourhood Plan Committee as preferred options within the Pre-Submission Plan (Regulation 14). The Pre-Submission Consultation will take place for a 6-week period starting on 20 September 2021.
- 15.26. Appendix B includes the sites not chosen as preferred sites.
- 15.27. The following table demonstrates the site considerations for the preferred sites.

## Appendix A – Results of the Housing Needs Survey

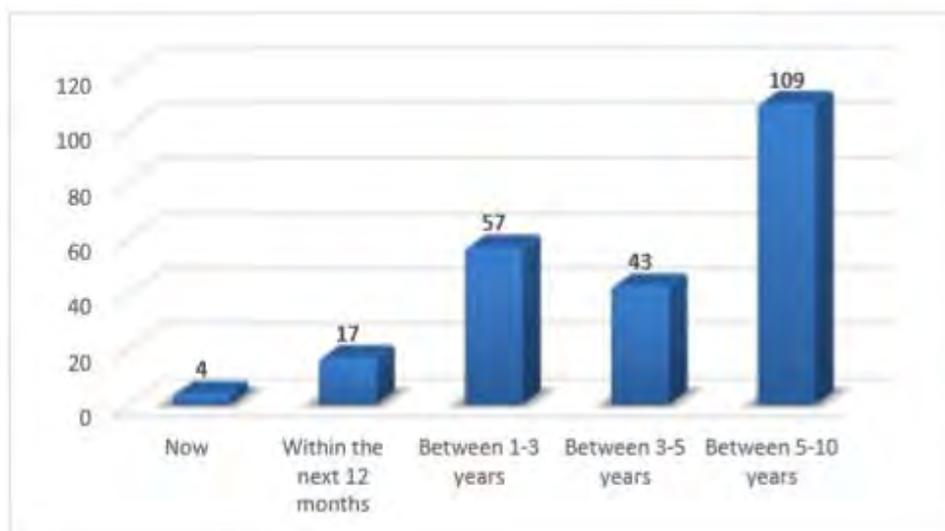
### Housing Need

This section considers responses to a part of the questionnaire only completed by those respondents who expressed they had a future or imminent housing need. The base for response is lower than the overall survey and therefore should be used with caution.

#### Housing need for current residents

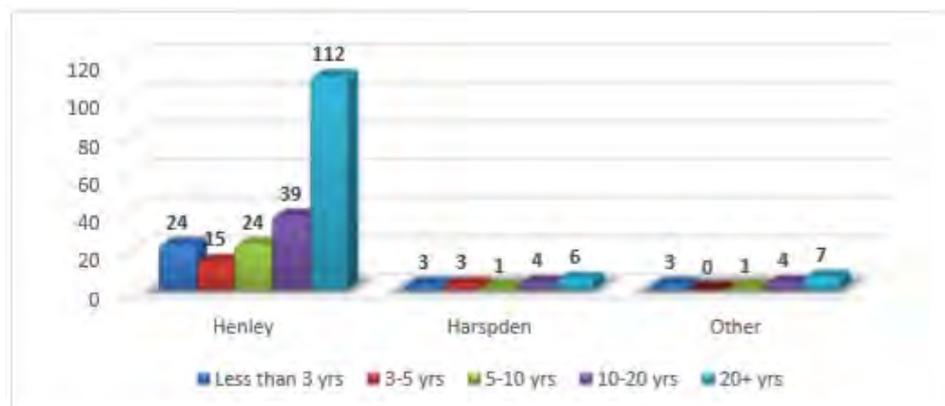
A total of 244 people stated that they would require a house in the next 10 years and 52% of respondents (121) would require a home within the next five years.

**Figure 14 -When would you need to move into this new home?**



There is a significant difference based on length of time in living in the Neighbourhood Plan Area (NPA). Those who have lived in Henley-on-Thames longest (over 10 years) are more likely to need to move, 46% advised they did need another home.

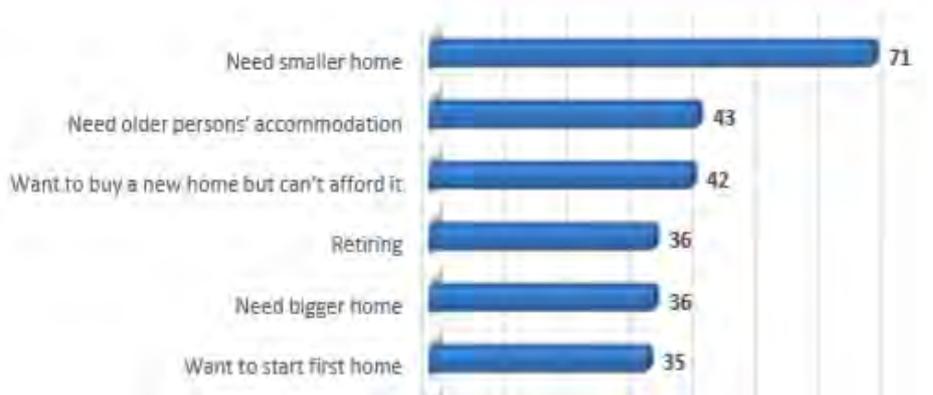
**Figure 15 - How many years have you lived there?**



### Reason for Housing Need

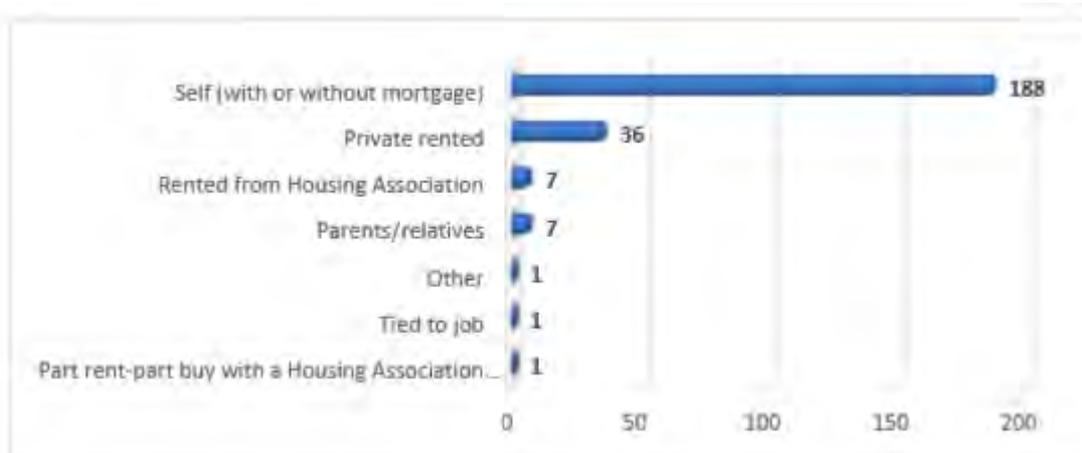
The main reason for requiring a new home was due to people needing a smaller home with 71 stating this as the reason (30%), 43 people need older persons' accommodation (18%) and 42 people want to buy a new home but can't afford it (18%).

**Figure 16 - Why does your household need a new home?**



Those in detached houses were in the most need to move house, 112 of respondents (47%), with people in terrace and semi-detached accounting for a fifth each. 114 of respondents had more than 4 bedrooms in their existing house and the majority of people (78%) owned their existing property (with or without a mortgage).

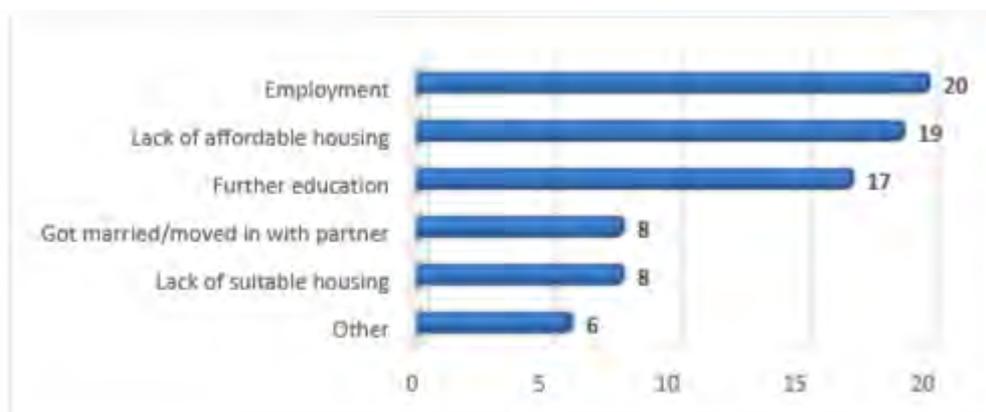
**Figure 17 - Who owns the home you live in now?**



When asked why people in the household had left Henley or Harpsden, the most popular reason (20 persons) was due to employment. 29 people out of 45 stated it was due to the lack of affordable housing.

It should be noted that respondents were invited to select all options that met their reasons.

**Figure 18 - Why did they leave?**

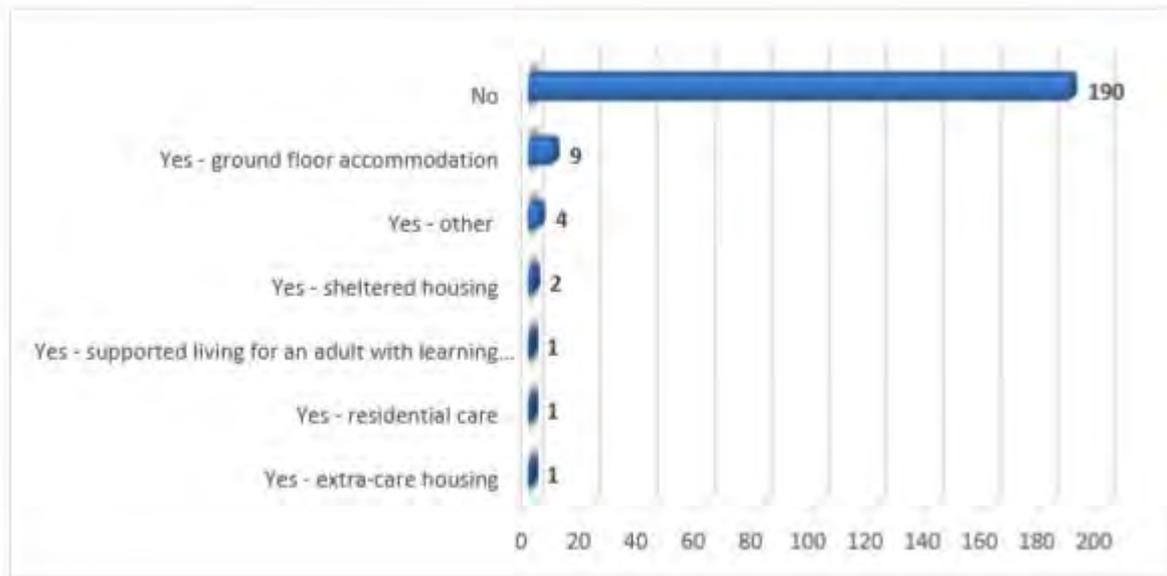


**Tenure and size of housing needed**

The majority (92%) of those who have a housing need do not require specialist housing.

A few stated that limited mobility 11% (22 persons) would impact upon the house they needed and 5% (10 persons) have other care/support need.

**Figure 19 - Does anyone in your household have a specialist housing need?**



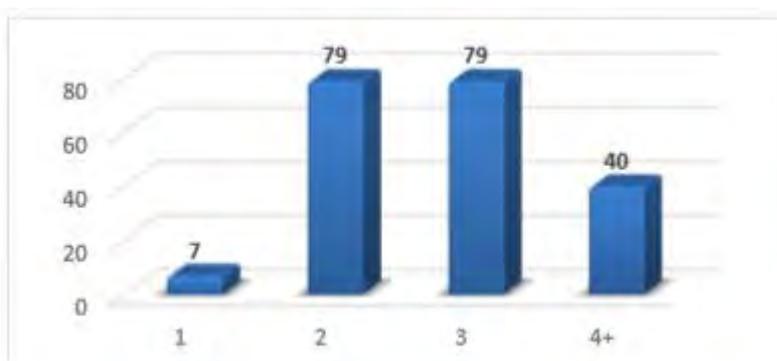
The preferred tenure to meet housing need 'Housing for sale at a lower price' with 73% of respondents selecting this option. 19% of respondents would prefer a self build, and 11% would prefer to rent from a housing association (with affordable rents). Shared ownership would suit 5% of respondents. Private renting is low at 2% of respondents with a housing need.

**Figure 20 - Which of the following would be best for you?**



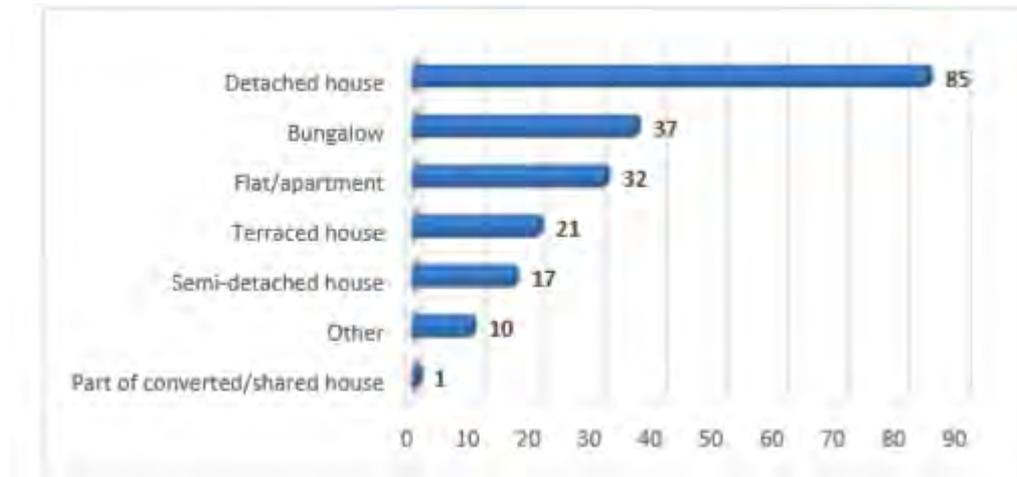
When asked to consider which size housing would best suit their need, most respondents (39% respectively) require a 2 or 3 bed property.

**Figure 21 - How many bedrooms would your new home need?**



The majority of respondents (42%) want a detached home, followed by 18% wanting a bungalow and a 16% wanting a flat/apartment.

**Figure 22 - What type of home would best meet your needs?**



Out of the people currently renting, 76% (39 persons) considered that they would want to buy a new home but couldn't afford to, in comparison to just 12 persons that were currently renting down to choose.

**Figure 23 - 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?**



Of the respondents who expressed a need for new housing, the majority (14%) are not on the South Oxfordshire Council Housing Register.



## Appendix B: Additional Site Assessment

Pro-forma for sites considered further by the NPC.

| Detail                              | Assessment  |
|-------------------------------------|---|
| Site Reference / Name               | Site 853a   |
| Site Address / Location             | Land at Highlands Farm  |
| Proposed Use (and numbers)          | Mixed Use Site including 110 dwellings  |
| AECOM Assessment                    | <p>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.</p> <p>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.</p> <p>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.</p>   |
| Site Selection Group Recommendation | <p>Allocate</p> <p>Considered suitable to be allocated for mixed use development including residential development for approximately 110 dwellings, employment/ community facilities, the relocation of the Chiltern Centre and the provision of community-led housing.</p> <p>This site can provide housing and affordable housing required for Henley , open space and employment and community land. The site is well connected to Henley. This is considered to be one of the most sustainable and suitable sites of the alternatives.</p>  |
| Relevant NP Objectives              | The site would accord with objectives: H01, H02, H04, H05, H06, H07.  |
| <b>Additional Criteria</b>          |   |
| Benefit to town                     | <p>The site is for a mixed use scheme which could deliver employment/ community facilities, the relocation of the Chiltern Centre and the provision of community-led housing which would provide a number of benefits to the Neighbourhood Plan Area.</p> <p>The latest Housing Needs Assessment demonstrates that there is a need for affordable housing for Henley and Harpsden. Policy H3 of the Local Plan 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.</p> <p>The advantage of this site coming forward rather than a number of smaller sites would be that it could deliver the quantum of development required and deliver a greater number of affordable housing required for the</p> |

|                              |  |
|------------------------------|--|
|                              | <p>Neighbourhood Plan Area. This development could bring forward approximately 44 additional affordable houses.</p> <p>The disadvantage of allocating a number of smaller sites (especially those under 10 dwellings) would that they would yield few, if any affordable housing and other benefits for the area.</p> <p>Site 853a would adequately achieve the quantum of development required for Henley and deliver other improvements through additional CIL and S106.</p> |
| Loss of other beneficial use | n/a  |
| Climate emergency            | The site is well located to the town on an existing bus route with pedestrian and cycle links available. It would comply with the Local Plan strategy to direct growth towards Henley.   |
| Landscape Impact             | 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.  |
| Impact on roads              | Considered to be a good access onto Greys Road.  |

| Detail                              | Assessment   |
|-------------------------------------|--|
| Site Reference / Name               | Site 2   |
| Site Address / Location             | Chiltern Centre, Greys Road  |
| Proposed Use (and numbers)          | 3 dwellings  |
| AECOM Assessment                    | <p>The site is previously developed land within the built-up area of Henley, access to services and facilities in less than a five-minute walk.</p> <p>This site is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is within the extent of the built-up area.</p> <p>The site is suitable for allocation in the Neighbourhood Plan.</p> <p>The site would remain suitable 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.</p> |
| Site Selection Group Recommendation | <p>Allocate</p> <p>Considered suitable to be allocated for residential development for approximately 3 dwellings.</p> <p>The site is within the built up area of Henley with good access to services and facilities. This is considered to be one of the most sustainable and suitable sites of the alternatives.</p>  |
| Relevant NP Objectives              | The site would accord with objectives: H01, H02, H03, H06.   |
| <b>Additional Criteria</b>          |  |

|                              |  |
|------------------------------|--|
| Benefit to town              | Development would replace the existing Chiltern Centre and would contribute towards improved facilities bringing wider benefits to the town. |
| Loss of other beneficial use | Development would replace the existing Chiltern Centre which is proposed to be relocated so no loss of beneficial use.                       |
| Climate emergency            | The site is previously developed land within the built-up area of Henley, access to services and facilities in less than a five-minute walk. |
| Landscape Impact             | Considered acceptable.   |
| Impact on roads              | Considered acceptable.   |

| Detail                              | Assessment  |
|-------------------------------------|---|
| Site Reference / Name               | Site C  |
| Site Address / Location             | Playing Fields at Gillotts School   |
| Proposed Use (and numbers)          | 50 or 80  |
| AECOM Assessment                    | The site is owned by Gillotts School and in use as a playing field. 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. The site area avoiding removal of existing trees is approx. 2.3 hectares. The proposed increase to 80 dwellings on the site would be a net density of approx. 46 dwellings per hectare, assuming 25% of the gross site is set aside for non-residential use required to support the development. This density is broadly in line with the made Neighbourhood Plan policy guidelines as set out in paragraph 5.8 and therefore would be an appropriate level of development, subject to detailed design and agreement with the Highways Authority (OCC) over access arrangements |
| Site Selection Group Recommendation | Allocate<br>Considered suitable to be allocated for residential development for approximately 50 dwellings.   |
| <b>Additional Criteria</b>          |   |
| Benefit to town                     | Bring investment to the school.   |
| Loss of other beneficial use        | Loss of playing fields.   |
| Climate emergency                   | n/a   |

|                  |   |
|------------------|---|
| Landscape Impact | <p>Not considered to be suitable for 80 dwellings, an increase of 30 dwellings would reduce the area available for tree coverage to screen the site as required through the existing JHHNP. A higher density scheme would have a greater impact on the landscape and wider views particularly to the south from across Harpsden Valley and the AONB.</p> <p>50 dwellings on this site would be more appropriate to respond to the site's environmental and landscape context and allow for landscaping.</p> |
| Impact on roads  | 80 dwellings on this site would increase the traffic and impact on Blandy Road.   |

| Detail                              | Assessment  |
|-------------------------------------|---|
| Site Reference / Name               | Site J  |
| Site Address / Location             | 353-357 Reading Road  |
| Proposed Use (and numbers)          | Currently allocated for 30, now being considered for 50 dwellings   |
| AECOM Assessment                    | Clearance of the site of existing buildings and diversion of a large number of utilities would mean high development costs therefore the viability of the scheme should be established before the site is allocated to ensure the housing delivery is achievable. If a development brief could demonstrate that the level of development was achievable with respect to parking, open space and other requirements and the access arrangements designed to allow continued access for the retail delivery to the adjacent superstore, the site could be allocated for 50 dwellings in the revised Neighbourhood Plan. Therefore, the site is suitable for allocation in the Neighbourhood Plan subject to consultation with SODC. |
| Site Selection Group Recommendation | Allocate for 50 dwellings<br>Considered suitable to be allocated for residential development for approximately 50 dwellings.  |
| <b>Additional Criteria</b>          |   |
| Benefit to town                     | The site would bring forward a mixed-use site including 200sqm of retail/commercial land.   |
| Loss of other beneficial use        | No loss of other beneficial use.  |
| Climate emergency                   | Previously developed land which has limited ecology. Sustainable location within the centre with good access to facilities.   |
| Landscape Impact                    | Already located within the built-up area, it sits behind an apartment scheme which is 3-4 storey; generally apartment/flatted development along this end of the Reading Road, including a McCarthy & Stone scheme. Tesco car park and superstore on adjacent site., Therefore impact on landscape would be limited.   |

|                 |                            |
|-----------------|----------------------------|
| Impact on roads | Considered to be suitable. |
|-----------------|----------------------------|

| Detail                              | Assessment  |
|-------------------------------------|---|
| Site Reference / Name               | Site 5  |
| Site Address / Location             | Land west of Fairmile   |
| Proposed Use (and numbers)          | 72  |
| AECOM Assessment                    | Considered Suitable:<br>The site is greenfield within the general built-up area of Henley, the surrounding land is an adopted allocation in the existing Neighbourhood Plan therefore would act as an extension of this allocation. |
| Site Selection Group Recommendation | Allocate<br>Considered suitable to be allocated for residential development for approximately 72 dwellings.   |
| <b>Additional Criteria</b>          |   |
| Benefit to town                     | Balances out the town with development to North.  |
| Loss of other beneficial use        | No loss of other beneficial use.  |
| Climate emergency                   | Closer to facilities and services within the Town.  |
| Landscape Impact                    | Limited increase in impact on landscape than 60 dwellings already allocated in existing JHHNP.  |
| Impact on roads                     | Considered to be suitable.  |

| Detail                              | Assessment  |
|-------------------------------------|---|
| Site Reference / Name               | Site 1117   |
| Site Address / Location             | Land east of A4155, Wyevale   |
| Proposed Use (and numbers)          | 60 dwellings  |
| AECOM Assessment                    | This site already has planning permission for 40 dwellings and is suitable to allocate for a further 20 dwellings as the principle of development is already established on the site.   |
| Site Selection Group Recommendation | Not to Allocate<br>The site already has planning permission for 40 dwellings under planning application P18/S0951/O. It is considered that this site should be brought forward as a mixed use site in line with the planning permission. Employment land being provided on the site would provide greater benefits to the Neighbourhood Plan Area than 20 additional dwellings. |
| <b>Additional Criteria</b>          |   |

|                              |   |
|------------------------------|---|
| Benefit to town              | The employment use on this site would benefit the Neighbourhood Plan Area and wider benefits to the community.  |
| Loss of other beneficial use | The loss of B1 and/or B2 and/or D1 floorspace as permitted through planning application P18/S0951/O for 20 additional houses would be a loss of beneficial use. |
| Climate emergency            | Providing a mix of uses on this site would be more appropriate and sustainable.   |
| Landscape Impact:            | n/a   |
| Impact on roads:             | Considered acceptable - already obtained outline planning permission and detailed consent for the access.   |

| Detail                              | Assessment   |
|-------------------------------------|--|
| Site Reference / Name               | Site 1158  |
| Site Address / Location             | Swiss Farm International, Marlow Road  |
| Proposed Use (and numbers)          | 73   |
| AECOM Assessment                    | Not Suitable: This site is not in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is outside the built-up area. The site is not suitable for allocation in the Neighbourhood Plan as it does not meet local policy and availability has not been established. The site may be suitable on policy grounds should the emerging plan become adopted policy, see paragraph 1.16 of the main report. |
| Site Selection Group Recommendation | Not to Allocate<br>The site is considered to be unsuitable by AECOM, the site is outside the built-up area. It would have no wider benefits to the town and is therefore considered to be unsuitable.  |
| <b>Additional Criteria</b>          |  |
| Benefit to town                     | Development of this site would not have wider benefits to the town. The site is not proposing additional affordable housing than what is required through Policy H9 Local Plan. It is therefore considered to be unsuitable for development as demonstrated by the AECOM assessment. Furthermore, the preferred sites would deliver the quantum of development required and are considered to be more suitable.                          |
| Loss of other beneficial use        | Development of this site would result in the loss of other beneficial uses. The site currently provides a number of community benefits including events, parking and useful open space.  |

|                   |  |
|-------------------|--|
| Climate emergency | It is considered that this site is outside of the built-up area and therefore is not suitable. |
| Landscape Impact  | n/a  |
| Impact on roads   | n/a  |

| Detail                              | Assessment   |
|-------------------------------------|--|
| Site Reference / Name               | Site 6   |
| Site Address / Location             | Land at Reading Road, Harpsden Meadows   |
| Proposed Use (and numbers)          | 39   |
| AECOM Assessment                    | Not Suitable: The site is greenfield located between Henley and Harpsden. It is approximately a 15-minute walk to services and facilities. The 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. The site is not suitable for allocation in the Neighbourhood Plan as it does not meet local policy. The site may be suitable should the emerging plan become adopted policy, see paragraph 1.16 of the main report. |
| Site Selection Group Recommendation | Not to Allocate<br>Although affordable housing is being proposed, it is considered that the preferred site for development would provide the quantum of development required including land for community led housing. This site is located outside of the built-up area and development in this location would fail to meet objective HO2 of the Neighbourhood Plan to ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other.                                       |
| <b>Additional Criteria</b>          |  |
| Benefit to town                     | Although affordable housing is being proposed, it is considered that the preferred site for development would provide the quantum of development required including land for community led housing.  |
| Loss of other beneficial use        | n/a  |
| Climate emergency                   | It is considered that this site is outside of the built-up area and therefore is not suitable. Part of the site is within Flood Risk Zone 3.   |
| Landscape Impact                    | The site would fail to meet objective HO2 - Ensure that Henley and Harpsden remain distinct settlements, separated physically and visually from one other.   |
| Impact on road                      | Considered that development of this site could have an adverse impact on Reading Road.   |

| Detail                     | Assessment  |
|----------------------------|---|
| Site Reference / Name      | NEW1  |
| Site Address / Location    | Land north of Crossways, Woodlands Road, Harpsden   |
| Proposed Use (and numbers) | 11  |
| AECOM Assessment           | <p>This is a greenfield site within the built up area. It is approximately a 15 minute walk to services and facilities.</p> <p>The landscape is a combination of Chiltern Plateau and Thames Valley with a gently undulating and semi enclosed landscape type. The site falls within a SSSI Impact Risk Zone and nitrate vulnerable zone however, this does not impact residential development. While there is no specialist landscape study available for this site it is likely that the site has medium landscape sensitivity and low visual sensitivity. The site is in close proximity to the Lower Shiplake war memorial however, mitigation is likely to be possible to reduce the harm on this asset. There is existing access however, it would require upgrading.</p> <p>The site is subject to a current planning application for 20 dwellings, the supporting documents for which demonstrate that the proposal would not impact upon landscape or heritage assets.</p> <p>This site partially meets objectives in the NP as it does not contribute to coalescence between Henley and Harpsden however, it is a greenfield therefore does not meet the objective of prioritising brownfield.</p> <p>This site is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is within the built- up area. In addition, the adjoining site (site 1036) has planning permission and is under construction. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5 year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site.</p> <p>Therefore, the site is suitable for allocation in the Neighbourhood Plan subject to consultation with SODC.</p> <p>The site would remain suitable 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.</p> |

|  |  |
|--|--|
| <p>Site Selection Group Recommendation</p> | <p><b>Not to Allocate</b><br/> 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>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>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".</p> <p>It is considered that these reasons would still apply when considering the site for 11 homes.</p> <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>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>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>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.</p> |
| <p><b>Additional Criteria</b></p>          |  |
| <p>Benefit to town</p>                     | <p>No additional benefits to the town. Furthermore, the preferred sites would deliver the quantum of development required and are considered to be more suitable and better related to Henley.</p>   |
| <p>Loss of other beneficial use</p>        | <p>n/a</p>   |

|                   |   |
|-------------------|---|
| Climate emergency | <p>The location of the site would not result in sustainable development, the site is situated closer to Shiplake and not the services and facilities within Henley.</p> <p>The Local Plan strategy directs growth to the main towns including Henley (a requirement of 115 dwellings), it does not direct growth to Shiplake. It is therefore in conflict with the strategy/policies within the Local Plan.</p> |
| Landscape Impact  | The site would as a result of not being in the built-up area have an adverse impact on the landscape.   |
| Impact on roads   | Considered that development of this site could have an adverse impact on Reading Road.  |

| Detail                              | Assessment  |
|-------------------------------------|---|
| Site Reference / Name               | Site 13   |
| Site Address / Location             | Thames Poultry Farm House, Harpsden   |
| Proposed Use (and numbers)          | 3   |
| AECOM Assessment                    | <p>The site does not currently meet local policy as it is not within or adjacent to the built-up area however, the adjoining site (site 1036) has planning permission and is under construction which would change this. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5- year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, consultation with SODC would be required to determine whether development of the site would meet policy. In addition, the site has a current planning application on it for 3 dwellings which should be monitored.</p> <p>Therefore, the site is potentially suitable for allocation in the Neighbourhood Plan subject to consultation with SODC. The site may be suitable on policy grounds should the emerging plan become adopted policy, see paragraph 1.16 of the main report.</p> |
| Site Selection Group Recommendation | <p>Not to Allocate</p> <p>The site is closer related 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>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>A planning application on this site for housing was refused planning permission (P19/S1858/O) by SODC and dismissed at appeal, this is taken from the inspectors decision: “ Policy H16 of the Local Plan provides that (amongst other things) within Smaller Villages (such as Lower Shiplake) development should be limited to infill. Infill development is defined in paragraph 2 of Policy H16 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. It is common ground that the proposal does not meet the first limb of the definition of infill development given in paragraph 2 of Policy H16. 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. In my view, due to the distance of the site from the centre of Lower Shiplake and the noticeable change in character from the built-up village setting of Lower Shiplake to the developed countryside beyond the A4155, it is currently not reasonable to consider the site as being within Lower Shiplake. Therefore, as the proposal, for an outline application for the erection of 3 detached dwellings, 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 Policy H16”.</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>It is considered that these reasons set out in the appeal decision would still apply and 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.</p> |
| <b>Additional Criteria</b>   |   |
| Benefit to town              | No additional benefits to the town. Furthermore, the preferred sites would deliver the quantum of development required and are considered to be more suitable and better related to Henley.   |
| Loss of other beneficial use | n/a   |
| Climate emergency            | <p>The location of the site would not result in sustainable development, the site is situated closer to Shiplake and not the services and facilities within Henley.</p> <p>The Local Plan strategy directs growth to the main towns including Henley (a requirement of 115 dwellings), it does not direct growth to Shiplake. It is therefore in conflict with the strategy/ policies within the Local Plan.</p>  |
| Landscape Impact             | The site would as a result of not being in the built-up area have an adverse impact on the landscape. It would result in urbanisation of this area.   |
| Impact on roads              | Considered that development of this site could have an adverse impact on Bolney Lane.   |

| Detail                              | Assessment   |
|-------------------------------------|--|
| Site Reference / Name               | Site 14  |
| Site Address / Location             | The Bungalow, Green Acres, Harpsden Woods  |
| Proposed Use (and numbers)          | 8  |
| AECOM Assessment                    | <p>The site is previously developed land located outside the built-up area. It is approximately a ten-minute walk to services and facilities. 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. The site does not currently meet local policy as it is not within or adjacent to the built-up area however, a site to the south (site 1036) has planning permission and is under construction which would change this. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5-year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, consultation with SODC on whether the site would meet policy would be required. Therefore, the site is potentially suitable for allocation subject to consultation with SODC. The site may be suitable on policy grounds should the emerging plan become adopted policy, see paragraph 1.16 of the main report.</p>  |
| Site Selection Group Recommendation | <p>Not to Allocate</p> <p>The site is closer related 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>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>This is in a similar location to Site 13 and therefore the reasons set out in dismissed appeal would apply (P19/S1858/O) " Policy H16 of the Local Plan provides that (amongst other things) within Smaller Villages (such as Lower Shiplake) development should be limited to infill. Infill development is defined in paragraph 2 of Policy H16 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."</p> <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>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</p> |

|                              |  |
|------------------------------|--|
|                              | <p>would conflict with the relevant provisions of the Local Plan (including Policy H16) and the Neighbourhood Plan objectives.</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>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.</p> |
| <b>Additional Criteria</b>   |  |
| Benefit to town              | No additional benefits to the town. Furthermore, the preferred sites would deliver the quantum of development required and are considered to be more suitable and better related to Henley.  |
| Loss of other beneficial use | n/a  |
| Climate emergency            | <p>The location of the site would not result in sustainable development, the site is situated closer to Shiplake and not the services and facilities within Henley.</p> <p>The Local Plan strategy directs growth to the main towns including Henley (a requirement of 115 dwellings), it does not direct growth to Shiplake. It is therefore in conflict with the strategy/policies within the Local Plan.</p>  |
| Landscape Impact             | The site would as a result of not being in the built-up area have an adverse impact on the landscape. It would result in urbanisation of this area.  |
| Impact on roads              | Considered that development of this site could have an adverse impact on Bolney Lane.  |

| Detail                              | Assessment   |
|-------------------------------------|--|
| Site Reference / Name               | Site 878   |
| Site Address / Location             | Thames Farm (NE corner)  |
| Proposed Use (and numbers)          | 8  |
| AECOM Assessment                    | <p>This site is not in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is outside the built- up area. However, it will be in conformity once the two adjacent sites have been built out The site is potentially suitable for allocation in the Neighbourhood Plan. There are no major constraints, however conformity with policy relies on site 1117 being built out. The site's suitability would remain the same should the emerging plan become adopted policy.</p> |
| Site Selection Group Recommendation | <p>Not to Allocate</p> <p>The site is closer related 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>   |

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|                              | <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>This is in a similar location to Site 13 and therefore the reasons set out in dismissed appeal for Site 13 (P19/S1858/O) would apply“ Policy H16 of the Local Plan provides that (amongst other things) within Smaller Villages (such as Lower Shiplake) development should be limited to infill. Infill development is defined in paragraph 2 of Policy H16 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.”</p> <p>The SODC Officer report for refused planning permission (P20/S2103/FUL) for NEW1 would also apply to this site, which states: “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.”</p> <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>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>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>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.</p> |
| <b>Additional Criteria</b>   |  |
| Benefit to town              | No additional benefits to the town. Furthermore, the preferred sites would deliver the quantum of development required and are considered to be more suitable and better related to Henley.  |
| Loss of other beneficial use | n/a  |
| Climate emergency            | The location of the site would not result in sustainable development, the site is situated closer to Shiplake and not the services and facilitates within Henley.  |

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|------------------|---|
|                  | The Local Plan strategy directs growth to the main towns including Henley (a requirement of 115 dwellings), it does not direct growth to Shiplake. It is therefore in conflict with the strategy/ policies within the Local Plan. |
| Landscape Impact | The site would, as a result of not being in the built-up area, have an adverse impact on the landscape. It would result in urbanisation of this area.   |
| Impact on roads  | n/a   |

| Detail                     | Assessment   |
|----------------------------|--|
| Site Reference / Name      | Site NEW2  |
| Site Address / Location    | Hallemead House, Woodlands Road, Harpsden  |
| Proposed Use (and numbers) | 20 – 30  |
| AECOM Assessment           | <p>This is a greenfield site outside the built up area. It is approximately a 15 minute walk to services and facilities. The landscape is a combination of Chiltern Plateau and Thames Valley with a gently undulating and semi enclosed landscape type. The site falls within a SSSI Impact Risk Zone and nitrate vulnerable zone. While there is no specialist landscape study available for this site it is likely that the site has medium landscape sensitivity and low visual sensitivity. There is existing access however, it would require upgrading and there are no pedestrian links to the village/ services and facilities. This site partially meets objectives in the NP as it does not contribute to coalescence between Henley and Harpsden however, it is a greenfield therefore does not meet the objective of prioritising brownfield. This site is not in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site is adjacent to rather than within the built-up area. The site does not currently meet local policy as it is not within or adjacent to the built up area however, the adjoining site (site 1036) has planning permission and is under construction which would change this. Site 1036 was allowed at appeal as the inspector reasoned that SODC could not demonstrate a 5 year housing land supply, the effect on character of the immediate area would be moderately adverse, highways safety issues could be overcome, and the scheme satisfied the three roles of sustainable development. These could be applied to this site. Therefore, consultation with SODC on if the site would meet policy would be required. In addition, given the narrow access road and potential landscape impact, the capacity of the site should be lower than Site 1036 and would be more appropriate at the lower density of around 10 dwellings per hectare. Therefore, the site is potentially suitable for allocation in the Neighbourhood Plan subject to consultation with SODC. The site may be suitable on policy grounds should the emerging plan become adopted policy, see paragraph 1.16 of the main report.</p> |

|  |   |
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| <p>Site Selection Group Recommendation</p> | <p>Not to Allocate<br/>The site is closer related 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>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>This is in a similar location to Site 13 and therefore the reasons set out in dismissed appeal would apply (P19/S1858/O) “ Policy H16 of the Local Plan provides that (amongst other things) within Smaller Villages (such as Lower Shiplake) development should be limited to infill. Infill development is defined in paragraph 2 of Policy H16 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.”</p> <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>Whilst the Group acknowledge that part of the site is previously developed land. This would not outweigh that 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>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>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.</p> |
| <p><b>Additional Criteria</b></p>          |   |
| <p>Benefit to town</p>                     | <p>No additional benefits to the town. Furthermore, the preferred sites would deliver the quantum of development required and are considered to be more suitable and better related to Henley.</p>  |
| <p>Loss of other beneficial use</p>        | <p>n/a</p>  |
| <p>Climate emergency</p>                   | <p>The location of the site would not result in sustainable development, the site is situated closer to Shiplake and not the services and facilitates within Henley.</p> <p>The Local Plan strategy directs growth to the main towns including Henley (a requirement of 115 dwellings), it does not direct growth to Shiplake. It is therefore in conflict with the strategy /policies within the Local Plan.</p>   |
| <p>Landscape Impact</p>                    | <p>Whilst the group acknowledge that part of the site is previously developed land. The site would as a result of not being in the built-up area have an</p>  |

|                 |  |
|-----------------|--|
|                 | adverse impact on the landscape. It would result in urbanisation of this area. |
| Impact on roads | n/a  |



Joint Henley and  
Harpsden  
Neighbourhood Plan

Topic Paper 3

# Retail, Town Centre and Economy

*September 2021*



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## 16. Disclaimer

- 16.1. 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. It is intended to provide an insight into how the plan has climate and environmental issues as a golden thread throughout the document.
- 16.2. 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.

## 17. Wanted – Your Views

- 17.1. Henley Town Council and Harpsden Parish Council invites representations on its Draft Neighbourhood Development Plan (known as the “Joint Henley and Harpsden Neighbourhood Plan” (JHHNP)). This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.
- 17.2. The consultation period runs from 20 September 2021 to 1 November 2021.
- 17.3. During this consultation we are consulting on the draft plan and associated evidence base. The Neighbourhood Plan Committee wants to gather the views of all stakeholders, particularly those who live, work, or do business in Henley and Harpsden.
- 17.4. 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.
- 17.5. 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

## 18. How to do this?

- 18.1. All responses to this consultation must be received prior to the end of the consultation period which is midnight on 1 November 2021. Responses must include a name, address and - if relevant - the organisation you are representing.

**We would prefer it at all possible that comments are made using an online feedback system – you can do this at: <https://jhhnp.org.uk/>**

- 18.2. However, you can also collect a hard copy of the feedback form from Henley Town Hall. Please return your completed form to the location you collected it from.

## 19. Purpose

19.1. The purpose of this topic paper is to demonstrate how the Plan has been developed and evidenced in terms of retail, town centre and the economy.

19.2. 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.

19.3. The background papers are:

- Paper 1 - Environmental, Sustainability and Climate Change
- Paper 2 - Housing
- Paper 3 - Retail, Town Centre and Economy
- Paper 4 - Transport
- Paper 5 - Infrastructure

19.4. These background papers can be downloaded from the Joint Henley and Harpsden Neighbourhood Plan website - <https://jhhnp.org.uk/>.

## 20. Introduction

20.1. Henley Town Council and Harpsden Parish Council are preparing a new Neighbourhood Plan. This will set out the key elements of the planning framework for Henley and Harpsden covering the period 2020 to 2035. Once 'made' it will replace the existing Joint Henley and Harpsden Neighbourhood Plan (JHHNP) which came into force in April 2016.

20.2. The review is necessary due to the requirements set out in the new South Oxfordshire District Council Local Plan which was adopted in December 2020. This includes delivery of new homes and employment land, meeting affordable housing needs and addressing environmental issues such as air quality. The Neighbourhood Plan needs to be reviewed to ensure it is up to date and able to continue strongly influencing planning decisions.

20.3. The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Henley and Harpsden, that is the South Oxfordshire Local Plan. Throughout the document, for each Neighbourhood Plan policy, the relevant policies from this plan are referenced.

## 21. Vision & Objectives

21.1. The vision statement for the revised Plan embeds a commitment to environmental sustainability (tackling climate change) and states that: **“In 20 years’ time, Henley on Thames and the surrounding village of Harpsden will have a sustainable community, meeting the needs of current and future generations who live and work here and for visitors where possible. The community will be resilient in its capacity to address the likely impact of climate change whilst still protecting the special qualities of the area.”**

21.2. The revised Neighbourhood Plan includes the following retail, town centre and economy objectives:

- RO1 - To improve the offering within the town centre to deliver additional retail floorspace which would be subject to the requirements of objectively assessed evidence of need.
- RO2 - To encourage mixed-use developments with employment, retail and housing uses.
- RO3 - To encourage a wider mix and variety of shops and services in the town to cater for all ages.
- RO4 - To enhance town centre vehicle flows and car park management (linked to objective T05).
- RO5 - To provide for the needs of start-ups and hightech companies including encouraging the provision of shared office space 'hubs' and service centres.

## 22. Planning Context

### National Context

22.1. The National Planning Policy Framework (NPPF) sets out the key national planning priorities for England. The NPPF, revised in 2021, is accompanied by online Planning Practice Guidance.

22.2. The NPPF (paragraph 81) states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

22.3. Paragraph 82 adds that planning policies and decisions should recognise and address the specific locational requirements of different sectors.

22.4. Section 7 focuses on ensuring the vitality of town centres. Paragraph 85 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation

### Local Context

#### The South Oxfordshire District Council Local Plan 2035<sup>41</sup>

22.5. The South Oxfordshire Local Plan 2035 (SOLP) was adopted in December 2020. It provides an overview of planning policy for South Oxfordshire, setting out how it should evolve and grow during the plan period (2011-2035). The Plan identifies locations for housing, retail and employment land as well as the infrastructure required to support this growth. Together with the adopted Neighbourhood Plans, the Local Plan forms the statutory development framework against which planning applications are determined.

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[https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=FolderView&ID=1173354792&CODE=341BA7B67420EFFF92E2F22C258C640E&NAME=South%20Oxfordshire%20Local%20Plan%202034&REF=SOLP\\_2034&REFERER\\_URL\\_IN=&SOV\\_A\\_IN=SOUTH](https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=FolderView&ID=1173354792&CODE=341BA7B67420EFFF92E2F22C258C640E&NAME=South%20Oxfordshire%20Local%20Plan%202034&REF=SOLP_2034&REFERER_URL_IN=&SOV_A_IN=SOUTH)

- 22.6. The South Oxfordshire District Council Local Plan includes a number of relevant policies. HEN1 requires the Neighbourhood Plan to strengthen the retail offer within Henley Town Centre; improve employment opportunities at existing employment sites and identify new sites for employment.
- 22.7. Policies EMP1 and EMP5 require the Neighbourhood Plan to make allocations of at least a further 1 hectare of employment land. It goes on to state the review of the Neighbourhood Development Plan must be submitted to the Council within 12 months of adoption of this Local Plan. If the Neighbourhood Development Plan has not adequately progressed with allocating employment sites to meet these requirements within 12 months of the adoption of this Local Plan, planning applications for employment will be supported provided that proposals comply with the overall employment distribution strategy as set out in Policy EMP1 and the overall plan distribution strategy as set out in STRAT1. In this time the planning authority will allocate site(s) through a review of the plan.
- 22.8. Policy EMP2 states that proposals for employment use will provide a range of sizes and types of premises, including flexible business space to meet current and future requirements. The Council will support proposals for premises suitable for small and medium sized businesses, including start-up/ incubator businesses (up to 150sqm) and grow-on space (up to 500sqm). Proposals for employment uses will be considered against these criteria and the overall employment distribution strategy at EMP1.
- 22.9. Section 9 of the Local Plan focuses on 'ensuring the vitality of town centres'. Policy TC2 identifies Henley-on-Thames as a major town centre, and states that the Council will promote the continued role and functions of the town centres to positively contribute towards their viability, vitality, character and structure. The policy states that to ensure the long-term vitality and viability of the town centres, the Council will apply a 'town centre first' approach to retail, services and other main town centre uses in accordance with the established hierarchy of centres.
- 22.10. Policy H21 states that the loss of existing residential accommodation in the town centres will not be permitted other than in accordance with the relevant policies of this Plan, except in cases of upper floor accommodation where an independent access does not exist and cannot be provided, or in cases where there are insurmountable environmental factors which militate against continued residential use. The loss of private gardens, which could affect the residential amenity of the occupants of existing dwellings will also be resisted.

## 23. Retail, Town Centre and Economy policies for Joint Henley and Harpsden Neighbourhood Plan

### Policy E1: Supporting Henley's Economy.

**Relevant Neighbourhood Plan Objective:**

- RO5- To provide for the needs of start-ups and hightech companies including encouraging the provision of shared office space 'hubs' and service centres.

23.1. Henley provides a significant and important employment offer which needs to be retained and enhanced. In particular, the needs of small and medium sized businesses in the business, professional, creative industries and information technology sectors must be supported, as well as more traditional industries and arts and crafts. Analysis has shown that the business sector is the driving force behind the Henley economy, more so than retail, tourism and education, although these are also key employment sectors. As across the county as a whole, manufacturing has continued to decline.

23.2. Pressures on land due to additional housing requirements focus the employment strategy on intensification (including higher density) and partial redistribution of employment land.

23.3. Industrial and office activity will be concentrated at the Reading Road industrial estate which will be protected for employment. Opportunities for office based employment and smaller businesses hubs will be distributed at a range of town centre and out of town sites including allocated sites of Empstead Works / Stuart Turner and Highlands Farm.

**Policy E1: Supporting Henley's Economy**

Development at Reading Road Industrial Estate that supports its role as the Neighbourhood Area's main employment area will be supported.

Non employment generating proposals will not be supported.

### Policy E2: Henley Town Centre

**Relevant Neighbourhood Plan Objective:**

- RO1 - To improve the offering within the town centre to deliver additional retail floorspace which would be subject to the requirements of objectively assessed evidence of need.

23.4. The South Oxfordshire District Retail Needs update 2017 states that Henley-on-Thames is a strong-performing attractive and historic town centre. To a greater extent than the other centres in the District, it performs a dual function, both as a shopping and services centre for residents in the south-eastern part of the District, and also as a tourism destination, chiefly focused around events such as the annual Royal Regatta and the Henley Festival of Music and Arts. Almost half of the users of Henley town centre are from outside the South Oxfordshire area.

23.5. Section 9 of the Local Plan focuses on 'ensuring the vitality of town centres'. Policy TC2 identifies Henley-on-Thames as a major town centre, and states that the Council will

promote the continued role and functions of the town centres to positively contribute towards their viability, vitality, character and structure. The policy states that to ensure the long-term vitality and viability of the town centres, the Council will apply a 'town centre first' approach to retail, services and other main town centre uses in accordance with the established hierarchy of centres.

23.6. Paragraph 9.11 of the Local Plan states that the Council considers that the national threshold for a Retail Impact Assessment of 2,500sqm is not appropriate for the district. The Retail and Leisure Needs Assessment (2016) identifies that while Didcot is performing well, the other centres are relatively small and could potentially be adversely impacted upon by out-of-centre development.

23.7. This section goes onto to state that modern retailers selling a range of comparison goods generally have a requirement for a larger format unit. A threshold of 500sqm is deemed appropriate for protecting the vitality and viability of the district's centres when considering the size of the smallest 'main' foodstore in the district is 569sqm. The retail impact analysis threshold will be kept under review

### **Comparison goods**

23.8. The 2017 Retail Assessment Update states that the proportion of comparison goods expenditure which is retained by Henley from its local catchment was found to have increased from 29% to 42%, suggesting the centre's offer has improved in recent years. The centre also has a particularly strong range of restaurants and coffee shops in the centre, reflective of both its affluent catchment and its tourism role.

23.9. Policy TC3: Comparison Goods Floorspace Requirements includes the following:

3. In Henley-on-Thames, Thame and Wallingford there is no qualitative need for additional comparison goods floorspace during the plan period. Applications for new comparison goods floorspace in these town centres should be treated on their individual merits.
4. Applications for comparison retail located outside of town centres will be required to demonstrate compliance with the sequential test and the locally set retail impact threshold (500sqm or as modified by the Council in response to the latest evidence).

### **Convenience goods**

23.10. Projections undertaken in 2017 indicate that additional floorspace (1,500sqm) for convenience goods will be required for Henley.

23.11. Local Plan Policy TC4: Convenience Floorspace Provision in the Market Towns includes the following:

1. Each of the three Market Towns should make provision for a single format food store with at least 1,500sqm net sales floorspace. As per Policy TC2, 'a town centre first' approach will be expected to be undertaken and then, if this is not appropriate, edge of

centre and then a criteria based selection assessment. This will be provided at the following locations:

| Location         | Site   | Net amount of retail floorspace required |
|------------------|--|--|
| Henley-on-Thames | Sites to be identified through the review of the Henley – Harspden Neighbourhood Development Plan. | 1,500sqm                                 |

23.12. The Joint Henley-Harspden Neighbourhood Development Plan has identified a key opportunity site to accommodate retail floorspace requirements in Henley-on-Thames. The Local Plan is supportive of this opportunity.

23.13. It is proposed that the allocation of Empstead Works/ Stuart Turner (Policy SP3) will meet this requirement. The site will be allocated for a mixed use scheme including at least 3,000sqm of town centre mixed uses including 1,500sqm for retail floorspace.

23.14. Furthermore, Policy E2: Henley Town Centre will allow for proposals for new retail within the defined town centre boundary.

**POLICY E2: HENLEY TOWN CENTRE**

The Henley Town Centre boundary is shown on the Henley Town Centre Plan.

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 to the town centre by walking, cycling and public transport, and have appropriate on and/ or off-street car parking provision. Such proposals will be subject to a sequential test and, for proposals comprising 500sqm or more net additional floorspace, an impact assessment.

Proposals which fail to satisfy the sequential test or is likely to have a significant adverse impact will not be supported.

### Policy EM3: Market Place Hub

- 23.15. The very popular Charter Markets are held in the Market Place every Thursday as well as monthly farmers markets and Henley holds several weekend Continental style Markets each year. The 'Changing face of the High Streets South Oxfordshire's town centres', February 2014, report prepared by South Oxfordshire District Council highlights the importance of Market Square as focal hub and recommends enhancing the restaurant offer within the Market Place area, particularly to the north.

#### **Policy EM2: Market Place Hub**

The following development will be supported within Market Square : a) Use Class A3 Food and Drink uses, particularly within the northern part of the square; b) market stalls ; c) secure cycle storage , particularly a covered facility

### Policy EM4 : Employment and Residential above shops

- 23.16. A wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. Residential and in particular employment uses above shops will be encouraged.
- 23.17. Local Plan Policy H21 states that the loss of existing residential accommodation in the town centres will not be permitted other than in accordance with the relevant policies of this Plan, except in cases of upper floor accommodation where an independent access does not exist and cannot be provided, or in cases where there are insurmountable environmental factors which militate against continued residential use. The loss of private gardens, which could affect the residential amenity of the occupants of existing dwellings will also be resisted.

#### **Policy EM4: Employment and Residential above shops**

Residential and in particular employment uses above shops will be encouraged, to enhance the vibrancy and vitality of the town centre and local economy.

## Existing Policy TCE3: Hotel and Bed Space

23.18. It is proposed to remove the existing policy from the JHNP for the reasons set out below.

23.19. The 2014 District Council study indicated that there was a need for additional hotel bed space in Henley. A number of hotel and bedspaces have been provided that have not been taken into account in the 2014 study and additional bedspaces have been provided since 2014.

23.20. The table shown in figure 1 sets out the level of need provided in Henley and the surrounding villages. In addition to this the Red Lion (Relais Henley) now has 43 bedrooms, Badgemore Park Golf Club have increased their number of bedrooms, Greenlands now has 100, and RiosHouse Hotel have more rooms shown on their website. On top this there are at least 20 privately run units of accommodation in Henley listed by Airbnb which cater for between 2 and 10 people.

| HOTEL, PUBS & B&B OVERNIGHT ACCOMMODATION SUPPLY 2020 |                   |       |      |                |     |              |  |                                    |
|---|-------------------|-------|------|----------------|-----|--------------|--|------------------------------------|
| NAME  | LOCATION          | HOTEL | CLUB | PUB WITH ROOMS | B&B | ROOM NUMBERS | DRIVING DISTANCE FROM HENLEY TOWN HALL | DRIVING TIME FROM HENLEY TOWN HALL |
| <b>0-15 minutes drive time from Henley</b>            |                   |       |      |                |     |              |  |                                    |
| <b>HENLEY: CENTRAL</b>                                |                   |       |      |                |     |              |  |                                    |
| The Catherine Wheel                                   |                   | Y     |      |                |     | 30           |  |                                    |
| Hotel Du Vin  |                   | Y     |      |                |     | 43           |  |                                    |
| The Imperial  |                   |       |      |                |     | Closed       |  |                                    |
| Leander   |                   |       | Y    |                |     | 11           |  |                                    |
| The Paddock   |                   |       |      |                | Y   | 6            |  |                                    |
| Phyllis Court   |                   |       | Y    |                |     | 17           |  |                                    |
| The Red Lion  |                   | Y     |      |                |     | 35           |  |                                    |
| Rioshouse   |                   |       |      |                | Y   | 8            |  |                                    |
| Row Barge   |                   |       |      | Y              |     | 4            |  |                                    |
|   |                   |       |      |                |     | <b>154</b>   |  |                                    |
| <b>HENLEY: SURROUNDING VILLAGES</b>                   |                   |       |      |                |     |              |  |                                    |
| Badgemore Park  | Rotherfield Greys |       | Y    |                |     | 8            | 1.3 miles                              | 3 minutes                          |
| The Bull  | Wargrave          |       |      | Y              |     | 5            | 3.9 miles                              | 10 minutes                         |
| The Baskerville                                       | Shiplake          |       |      | Y              |     | 4            | 3.1 miles                              | 10 minutes                         |
| Black Boys Inn  | Hurley            |       |      | Y              |     | 8            | 3.8 miles                              | 9 minutes                          |
| Cherry Tree Inn                                       | Stoke Row         |       |      | Y              |     | 4            | 6.0 miles                              | 13 minutes                         |
| Chiltern Valley Winery & Brewery                      | Old Luxtor        |       |      |                | Y   | 5            | 6.2 miles                              | 14 minutes                         |
| Crazy Fox   | Hurley            |       |      |                | Y   | 4            | 5.4 miles                              | 12 minutes                         |
| The Crown   | Playhatch         |       |      | Y              |     | 10           | 5.9 miles                              | 15 minutes                         |
| Danesfield House                                      | Medmenham         | Y     |      |                |     | 70           | 5.4 miles                              | 12 minutes                         |
| Dog & Badger Inn                                      | Medmenham         |       |      | Y              |     | 6            | 4.5 miles                              | 9 minutes                          |
| The Flower Pot  | Aston             |       |      | Y              |     | 3            | 2.9 miles                              | 9 minutes                          |
| Frog Inn  | Skirmett          |       |      | Y              |     | 3            | 6.6 miles                              | 14 minutes                         |
| Handywater Cottage                                    | Lower Assendon    |       |      |                | Y   | 4            | 1.0 miles                              | 5 minutes                          |
| Henley Business School                                | Greenlands        |       | Y    |                |     | 80           | 2.8 miles                              | 8 minutes                          |
| Hurley House  | Hurley            |       |      | Y              |     | 10           | 5.8 miles                              | 12 minutes                         |
| The New Inn   | Kidmore End       |       |      | Y              |     | 6            | 6.3 miles                              | 15 minutes                         |
| The Olde Bell   | Hurley            | Y     |      |                |     | 48           | 5.2 miles                              | 12 minutes                         |
| The Stag & Huntsman                                   | Hambleden         |       |      | Y              |     | 9            | 4.3 miles                              | 10 minutes                         |
| The White Hart  | Nettlebed         |       |      | Y              |     | 18           | 4.9 miles                              | 8 minutes                          |
|   |                   |       |      |                |     | <b>305</b>   |  |                                    |

Figure 24 - Hotel and Bed Space Provision 2020

23.21. 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.



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Joint Henley and  
Harpsden  
Neighbourhood Plan

Topic Paper 4  
**Transport**  
*September 2021*



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## 24. Disclaimer

- 24.1. 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. It is intended to provide an insight into how the plan has climate and environmental issues as a golden thread throughout the document.
- 24.2. 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.

## 25. Wanted – Your Views

- 25.1. Henley Town Council and Harpsden Parish Council invites representations on its Draft Neighbourhood Development Plan (known as the “Joint Henley and Harpsden Neighbourhood Plan” (JHHNP)). This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.
- 25.2. The consultation period runs from 20 September 2021 to 1 November 2021.
- 25.3. During this consultation we are consulting on the draft plan and associated evidence base. The Neighbourhood Plan Committee wants to gather the views of all stakeholders, particularly those who live, work, or do business in Henley and Harpsden.
- 25.4. 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.
- 25.5. 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

## 26. How to do this?

- 26.1. All responses to this consultation must be received prior to the end of the consultation period which is midnight on 1 November 2021. Responses must include a name, address and - if relevant - the organisation you are representing.

**We would prefer it at all possible that comments are made using an online feedback system – you can do this at: <https://jhhnp.org.uk/>**

- 26.2. However, you can also collect a hard copy of the feedback form from Henley Town Hall. Please return your completed form to the location you collected it from.

## 27. Purpose

- 27.1. The purpose of this topic paper is to demonstrate how the Plan has been developed and evidenced in relation to transport issues.
- 27.2. 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.
- 27.3. The background papers are:
- Paper 1 - Environmental
  - Paper 2 - Housing
  - Paper 3 - Employment
  - Paper 4 - Transport
  - Paper 5 - Infrastructure Statement
- 27.4. These background papers can be downloaded from the Joint Henley and Harpsden Neighbourhood Plan website - <https://jhhnp.org.uk/>.

## 28. Introduction

- 28.1. Henley Town Council and Harpsden Parish Council are preparing a new Neighbourhood Plan. This will set out the key elements of the planning framework for Henley and Harpsden covering the period 2020 to 2035. Once 'made' will replace the existing Joint Henley and Harpsden Neighbourhood Plan (JHHNP) which came into force in April 2016.
- 28.2. The review is necessary due to the requirements set out in the new South Oxfordshire District Council Local Plan which was adopted in December 2020. This includes delivery of new homes and employment land, meeting affordable housing needs and addressing environmental issues such as air quality. The Neighbourhood Plan needs to be reviewed to ensure it is up to date and able to continue strongly influencing planning decisions.
- 28.3. Planning policy and decision-making can make a significant contribution to reducing these levels of carbon emissions, through its influence over transport. However, many other interventions will be required beyond the remit of planning to achieve the national target in Henley and Harpsden. The Plan will also include wider strategies to help address key issues within the area which might not fall under planning. We have made sure to clearly differentiate between non-planning priorities and our planning policies.
- 28.4. In 2019, Henley Town Council declared a Climate Emergency and set up a Working Group. Henley Town Council's Climate Emergency 2030 Working Group (CE2030WG) has been formed to develop actions to reduce the Town's carbon emissions. The group are already undertaking initiatives with the objective of having project plans in place by 2030 to achieve net zero carbon emissions, many of which will already be operative before then.

- 28.5. The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Henley and Harpsden, that is the South Oxfordshire Local Plan. Throughout the document, for each Neighbourhood Plan policy, the relevant policies from this plan is referenced.
- 28.6. The Evidence Base will mirror the sections of the NP to enable easy read-across between each policy and the evidence underpinning it. Hence, as with the NP, each theme has its own chapter, subdivided into the objectives, supporting text and finally the policies themselves.
- 28.7. Evidence has been compiled from a number of sources:
- Extensive engagement with the community and local stakeholders including through focus groups, leaflet drops, local surveys and online representations.
  - Compilation of statistics and facts from existing documents and reports relating to Henley and Harpsden.

## 29. Vision & Objectives

29.1. The vision statement for the revised plan states that: **“In 20 years’ time, Henley on Thames and the surrounding village of Harpsden will have a sustainable community, meeting the needs of current and future generations who live and work here and for visitors where possible. The community will be resilient in its capacity to address the likely impact of climate change whilst still protecting the special qualities of the area.”**

29.2. The revised Neighbourhood Plan includes the following transport objectives:

- 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.
- 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.
- TO3 - To ensure that new development minimises congestion and air quality impacts of vehicle traffic.
- TO4 – To implement a range of innovative transport solutions in the JHHNP and surrounding areas using the Henley Transport Study.
- TO5 – to enhance vehicle and car park management, exploring opportunities for additional town centre parking, encouraging use of the station car park, potentially use of a digital car park management system and support schemes which encourage electric vehicles. To reduce vehicle movements both on the edge of town and in the town centre.

## 30. Planning Context

### Legislative Background

30.1. The Climate Change Act 2008<sup>42</sup> (amended in June 2019) commits the UK to reducing emissions of carbon dioxide and other greenhouse gases to zero by 2050 (view the Climate Change Act). Progress against the 2050 target is measured by legally binding carbon

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<sup>42</sup> [Legislation.gov.uk. 2021. Climate Change Act 2008. \[online\] Available at: <https://www.legislation.gov.uk/ukpga/2008/27/contents>](https://www.legislation.gov.uk/ukpga/2008/27/contents)

budgets, which cap the amount of greenhouse gases that can be emitted by the UK over a five-year period (measured by the Committee on Climate Change).

- 30.2. The Government has confirmed the ban of sales of new petrol and diesel cars and vans in 2030, and of hybrid cars and vans in 2035. Energy Savings Trust estimates c40% of cars will be electric powered by 2030 – suggesting a significant transition to electric vehicles pre-2030.<sup>43</sup>

### **The National Planning Policy Framework**

- 30.3. The National Planning Policy Framework (NPPF) sets out the key national planning priorities for England. The NPPF, revised in 2021, is accompanied by online Planning Practice Guidance.

- 30.4. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. It states that, at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 7).

- 30.5. Paragraph 8 adds that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 30.6. The NPPF 2021 retains an emphasis on Air Quality Management Areas (para 186) including a requirement to improve air quality and mitigate the impacts of individual sites and by stating that a strategic approach is required. Importantly the NPPF further acknowledges the linkage between sustainable patterns of development, reduced need for travel, good air quality and health (Paragraph 105) and states in para 174 that;

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<sup>43</sup> <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

*“Planning policies and decisions should contribute to and enhance the natural and local environment by: e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality...”*

- 30.7. Paragraph 104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- a) the potential impacts of development on transport networks can be addressed;
  - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
  - c) opportunities to promote walking, cycling and public transport use are identified and pursued;
  - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
  - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- 30.8. If setting local parking standards for residential and non-residential development, policies should take into account:
- b) the accessibility of the development;
  - c) the type, mix and use of development;
  - d) the availability of and opportunities for public transport;
  - e) local car ownership levels; and
  - f) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

#### **National Planning Practice Guidance**

- 30.9. Sitting below NPPF is a series of Planning Practice Guidance Notes (PPG) issued by Government to inform the conduct of planning. One of the topic-based notes considers Air Quality.

#### **Oxfordshire County Council**

- 30.10. Oxfordshire County Council is the local transport authority and has a statutory duty to produce a Local Transport Plan which is available to view at: [https://mycouncil.oxfordshire.gov.uk/documents/s33704/Background%20CA\\_JUN2816R07%20Connecting%20Oxfordshire%20vol%201%20-%20Policy%20and%20Overall%20Strategy.pdf](https://mycouncil.oxfordshire.gov.uk/documents/s33704/Background%20CA_JUN2816R07%20Connecting%20Oxfordshire%20vol%201%20-%20Policy%20and%20Overall%20Strategy.pdf) and covers the period from 2015 – 2031. Amongst other things it sets the programme for enhancing road capacity, reducing emissions, improving health and wellbeing and mitigation / developer contributions.

- 30.11. Their Active & Healthy Travel Strategy (A&HTS) sets out in detail how they intend to encourage and enable more people to travel actively and healthily. The Strategy has been

put together in collaboration with Public Health and brings together three active travel options - cycling, walking and Door to Door sustainable integrated travel.

30.12. Their EV Charging Strategy sets out the Oxfordshire County Councils' ambitions to stretch beyond the Governments proposed changes to the English Buildings Regulations, align planning policy requirements for EV charging infrastructure in local plans, and support the local planning system through development of clear guidelines on EV charging for both developers and planning officers.

30.13. Transport for New Developments – Parking Standards for new residential developments sets out the parking space provision for new residential areas including Henley in Appendix C.

30.14. Oxfordshire Freight Strategy sets out the strategy for freight network between 2015 and 2031. The strategy acknowledges that the bridge to Henley is an environmentally sensitive area. It states that 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 including 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.

30.15. Connecting Oxfordshire sets out Oxfordshire County Council's policy and strategy for developing the transport system in Oxfordshire to 2031

#### **The South Oxfordshire District Council Local Plan 2035**

30.16. The South Oxfordshire District Council Local Plan includes a number of relevant policies –

- Policy HEN1 - The Strategy for Henley-on-Thames
- ENV12 Pollution - Impact from Existing and/ or Previous Land Uses on New Development (Potential Receptors of Pollution)
- TRANS1b Supporting Strategic Transport Investment
- TRANS2 Promoting Sustainable Transport and Accessibility
- TRANS3: Safeguarding of Land for Strategic Transport Schemes:
- TRANS4 Transport Assessments, Transport Statements and Travel Plans
- TRANS5 Consideration of Development Proposals
- TRANS6 Rail

#### **Henley and Harpsden Transport Study Report**

30.17. This Study was produced in 2015 by Peter Brett to underpin the development of the existing Henley-on-Thames and Harpsden Neighbourhood Plan. The study considered the potential impact of the new housing proposals identified in the Neighbourhood Plan and a range of mitigation measures to meet the following objectives of the Study. The issues considered in the report still remain relevant and it is considered that a full review of the study will not be required.

- 30.18. The Henley and Harpsden Transport Study Report Addendum (September 2021) has been produced to provide an update on the transport conditions in Henley from the 2015 study to the present day in relation to:
1. Air Quality and Health
  2. Public Transport Provision
  3. Road Safety and Accident Data
  4. Traffic Count Data
- 30.19. The Addendum states that there have been significant changes in transport policy since 2015, but the objectives of the Henley and Harpsden Transport Study (2015) remain aligned and will contribute to deliver be a carbon neutral district by 2030.

## 31. Survey Results –updated to include Transport Survey

- 31.1. Two surveys have been undertaken to inform the revision of the Joint Henley and Harpsden Neighbourhood Plan. The first of these was a community survey carried out in late 2020, early 2021. 771 responses were received, giving confirmation that policies in the emerging Neighbourhood Plan aligned with views amongst the general public. The second survey was covering transport issues in particular and was targeted at community groups, organisations and businesses. Responses were requested from one representative of an organisation, with hundreds, if not thousands of people, covered by the respondents. The two biggest educational providers in the town responded, as well as one of the biggest sports clubs. Responses were also received from Thames Valley Police and one of the big supermarkets. Most respondents were located in Henley, whereas others were based in Reading or outlying villages.
- 31.2. The results of both surveys show that most people use their car to travel. According to the community survey, people would like to walk more (49%) and would like to use the bus or cycle more (41% each). The frequency of service was the top reason why people didn't use the bus more and the cost prevented people using the train more. The main reason for not walking and cycling more was due to the poor state of repair of pavements (56% gave this as the reason).
- 31.3. The majority of people completing the community survey felt that the main issues to address in relation to roads were potholes (82%) and poor state of repair in general (70%). The reasons given for how accessibility for cyclists and pedestrians could be improved were pedestrianised areas (52%), cycle lanes (51%) and more off-road footpaths (48%). 73% of people wanted to see more cycle parking at car parks.
- 31.4. The Transport Survey confirmed the opinion that levels of traffic and congestion were unreasonable or unmanageable (60%) as well as supporting more frequent bus services and better/more routes as the preferred means to improve public transport. Cycle lanes, better quality road surfaces and more cycle parking were identified as the most popular improvements to cycling. For walking, better quality and wider pavements were selected. 62% of respondents felt that there was insufficient parking provision in Henley and Harpsden, with 82% saying that more parking was needed. 80% suggested that HGV traffic should be restricted in Henley town centre and 88% agreeing a ban or restriction on HGVs would improve air quality. There were no positive impacts of the proposed housing developments in Henley on transport matters.

## 32. Transport policies for Joint Henley and Harpsden Neighbourhood Plan

### Policy T1: Impact of Development on the Transport Network

**Relevant Neighbourhood Plan Objective:**

TO3 - To ensure that new development minimises congestion and air quality impacts of vehicle traffic.

The evidence illustrates that action at the most local level that delivers practical support for improved transport infrastructure and activity should be sought.

- 32.1. Since 1997, Henley has had an Air Quality Management Area and results have shown it exceeds air quality standards in terms of nitrogen dioxide. The source of the problem is road traffic, primarily congestion building up along Duke Street, exacerbated by the canyon effect of a narrow road with tall buildings either side. As part of the AQMA, SODC continues to monitor NO<sub>2</sub> (nitrogen dioxides emissions) at their various monitoring points around the NA, including the town centre. The LAQM 2020 Annual Status Report states that there was an exceedance recorded in Henley AQMA located at 4 Duke Street, which recorded an annual average of 49 µg NO<sub>2</sub>/m<sup>3</sup> which exceeds the EU and UK threshold of 35 40 micrograms/cubic metres. The five-year trend of NO<sub>2</sub> levels in the district and within Henley AQMA continues to be a decreasing one, but some of the monitoring sites in Henley have registered higher concentrations than in 2018.
- 32.2. Individual air pollutants can cause a variety of health impacts. A review by the World Health Organization concluded that long-term exposure to air pollution reduces life expectancy by increasing the incidence of lung, heart and circulatory conditions. Public Health England (PHE), the independent body responsible for protecting the nation from public health hazards, has identified air pollution as a top priority for action.
- 32.3. Henley has an above average level of older people who are more likely to contract health issues, in addition to experience more severe affects of Covid-19. This is significant because poor air quality typically affects the more vulnerable members of society disproportionately to others<sup>44</sup>.
- 32.4. The public raised the issue of air and light pollution within a Community Survey carried out in early 2021. 84% of respondents to the survey were concerned about air and light pollution, with Reading Road (81%), Bell Street (76%) and Duke Street (72%) causing the greatest concern. When asked about issues in respect of roads in the area, 55% of respondents were concerned over air pollution and vibration from Heavy Goods Vehicles.
- 32.5. The traffic survey shows that the congestion in Henley is worse than the average across South Oxfordshire. The impacts of transport will have a greater impact than the rest

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<sup>44</sup> [Henley\\_profile\\_Feb21.pdf \(oxfordshire.gov.uk\)](#)

of the District and County in general. Henley-on-Thames is environmentally sensitive but still is a location for past and projected growth.

- 32.6. A further Transport Survey was sent to local businesses and schools, community groups and organisations and site owners and promoters in May 2021. Responses from this survey indicate that the majority of respondents did not have a travel plan. Traffic and congestion in Henley was also thought to be currently unreasonable or unmanageable by 60% of respondents and air quality considered to be neutral or bad by 84%. Development was considered by 78% of respondents to result in negative impacts on 8 different areas, including noise pollution, air quality and traffic and congestion.
- 32.7. The South Oxfordshire Local Plan Transport Topic Paper 2019<sup>45</sup> sets out the process and evidence the District Council has undertaken to produce and inform the Transport Policies included in the SODC Local Plan 2035. The paper sets out some of the key issues in the District including challenges and opportunities. This includes:
- The need for policies to ensure that development takes full account of its impact on the transport network and opportunities are taken to promote the use of sustainable modes.
  - The impact of growth in other districts and how that affects the transport network in South Oxfordshire.
- 32.8. Oxfordshire County Council are currently reviewing the Local Transport Connectivity Plan (LTCP) for the long term strategy for Henley-on-Thames and has published several consultation papers and as part of which it has produced baseline papers on a range of transport subjects and a baseline report.<sup>46</sup>
- 32.9. 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.
- 32.10. Henley Town Council and South Oxfordshire District Council both declared a Climate Emergency in 2019. The Climate Emergency 2030 Working Group was established by the Town Council, they have been working with local residents to reduce the carbon footprint of the Council and the town. They have many existing projects planned for the future, including ways to improve air quality and quality of life.

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[https://data.southoxon.gov.uk/ccm/support/dynamic\\_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA](https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA)

<sup>46</sup> <https://consultations.oxfordshire.gov.uk/consult.ti/ltcp.engagement/consultationHome>

## Policy T2: Active Travel

### Relevant Neighbourhood Plan Objectives:

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.

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.

The evidence demonstrates that Henley is one of the built-up areas in South Oxfordshire where sustainable transport has significant further potential.

32.11. Since 1997, Henley has had an Air Quality Management Area and results have shown it exceeds air quality standards in terms of nitrogen dioxide. The source of the problem is road traffic. As part of the AQMA, SODC continues to monitor NO<sub>2</sub> (nitrogen dioxide emissions) at their various monitoring points around the NA, including the town centre. SODC publish their air quality monitoring data for Henley at <https://oxfordshire.air-quality.info/local-air-quality-management/south-oxfordshire> 2020 Air Quality Annual Status Report (ASR).

32.12. The 2020 Air Quality Annual Status Report (ASR)<sup>47</sup> Vale of White Horse District Council set out measures which have been put in place to improve the air quality within the district.

Additional measures include:

- Providing personalised travel planning
- Promoting walking and cycling
- School and workplace travel planning
- Promoting the cycle network via OCC website

32.13. 84% of the respondents to the Survey undertaken in 2020/21 were concerned with air pollution, with the main areas of concern Reading Road, Bell Street and Duke Street. When asked about issues in respect of roads in the area, 55% of respondents were concerned over air pollution and vibration from Heavy Goods Vehicles.

32.14. Encouraging active travel can help with air quality issues in the NPA.

32.15. One challenge associated with encouraging sustainable travel at Henley-on-Thames will be in ensuring that new residents are immediately apprised of the sustainable travel options available to them, so that residents are informed of the travel choices they have rather than automatically using the car.

32.16. Sustainable Transport Study for New Developments – part of the Evidence Base for SODC's Local Plan 2035 by Steer Davies Gleave states that the levels of non-car ownership is higher than the South Oxfordshire average; 18% of households in Henley North and 14% of households in Henley South do not have a car or a van, compared with 12% of all

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<sup>47</sup> [Create Graph, South Oxfordshire District Council - Air Quality monitoring service \(airqualityengland.co.uk\)](https://www.valeofwhitehorse.gov.uk/air-quality-monitoring-service)

households in South Oxfordshire. This is likely to reflect the choice of viable alternatives for everyday travel in these areas specifically and across Henley-on-Thames as a whole. This is undoubtedly an opportunity for encouraging and increasing levels of sustainable travel for everyday journeys.

- 32.17. 40%<sup>48</sup> of all travel to work trips by Henley-on-Thames residents are 0-5km in length. Though the majority of these shorter trips are currently made sustainably (on foot, by bicycle or by public transport), there is potential to increase the proportion of shorter, intra-urban trips which are made on foot or by bicycle and realise the potential for trips to be made by sustainable means.
- 32.18. The South Oxfordshire Local Plan Transport Topic Paper 2019<sup>49</sup> sets out the process and evidence the District Council has undertaken to produce and inform the Transport Policies. It states that it will be important that sustainable transport improvements are realised within South Oxfordshire District as new development comes forward. The transport policies of the plan recognise this, highlighting the importance of promoting walking, cycling and public transport improvements to ensure that existing and new residents have opportunities to travel by means other than car.
- 32.19. It goes on to state that in other areas (outside the built up areas such as Didcot and Oxford) it is recognised that the car will remain an important way for residents to access facilities and services. New development can help minimise the impacts of this car travel by, for example, providing infrastructure to enable charging of plug-in and other low-emission vehicles from the outset.
- 32.20. In 2016, the county council and its partners updated, adopted and began delivering Connecting Oxfordshire 2011-2031: Local Transport Plan (LTP4)<sup>50</sup>, a transformation of how people travel to and within Oxfordshire, as part of a plan to create a less congested, less polluted city and county. The plan has three key components:
- 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.
- 32.21. The 2016 Connecting Oxfordshire; the Active & Healthy Travel Strategy sets out why there is a need for an active and healthy travel strategy and why cycling and walking are important and links to the health benefits. The Department of Health document Start Active, Stay Active (2011) states that regular physical activity can reduce the risk of many chronic conditions including type 2 diabetes, as well as coronary heart disease, stroke, cancer, obesity, mental health problems and musculoskeletal conditions.
- 32.22. Oxfordshire County Council are currently reviewing the Local Transport Connectivity Plan (LTCP) for the long term strategy for Henley-on-Thames and has published several

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<sup>48</sup> Sustainable Transport Study for New Developments -

[https://data.southoxon.gov.uk/ccm/support/dynamic\\_serve.jsp?ID=1283190528&CODE=753BC786212096D4962D97C168C98D67](https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190528&CODE=753BC786212096D4962D97C168C98D67)

<sup>49</sup>

[https://data.southoxon.gov.uk/ccm/support/dynamic\\_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA](https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA)

<sup>50</sup> <https://mycouncil.oxfordshire.gov.uk/documents/s33761/Annex%203%20-%20Connecting%20Oxfordshire%20vol%204%20-%20Active%20Healthy%20Travel%20Strategy.pdf>

<https://mycouncil.oxfordshire.gov.uk/documents/s33761/Annex%203%20-%20Connecting%20Oxfordshire%20vol%204%20-%20Active%20Healthy%20Travel%20Strategy.pdf>

consultation papers which relate to active travel including on cycle streets, greenways, walking and cycling infrastructure pans, low traffic neighbourhoods.

- 32.23. Oxfordshire Walking Design Standards 2017<sup>51</sup> and the Cycling Design Standards 2017<sup>52</sup> sets out additional information on how an attractive and functional environment for walking and cycling can be achieved that is available to all users. The research commissioned by British Cycling (2014) about the benefits of investing in cycling<sup>53</sup> states that investing in cycling will generate benefits for the whole country, not just those using a bike to get around. Eleven benefits are summarised in the document which can help solve a series of health, social and economic problems. The report shows how investing in cycling is good for our transport systems as a whole, for local economies, for social inclusion, and for public health. and the Manual for Streets<sup>54</sup>
- 32.24. The SODC Green infrastructure strategy sets out the opportunity for enhanced contribution to GI Objectives which include to improve the quality of the Thames Path at Henley-on-Thames to improve access along the River and to the wider countryside.
- 32.25. It also states that the Oxfordshire Way Link is a north-south Strategic Green Access Link which connects communities and facilities in the eastern side of South Oxfordshire with the wider countryside and destinations around Henley in the south and Cherwell District in the north. New access and connections along some sections of the Link would need to be established and existing access upgraded where appropriate to accommodate cycle use.
- 32.26. The SODC Regulation 123 list states that infrastructure projects (to be funded through CIL) on transport will be strategic highways or transport infrastructure projects (including public rights of way) and that section 106 will continue to fund site specific transport infrastructure including any works necessary for vehicle, cycle and pedestrian access and/or public transport on or adjacent to the site as a result of the development; mitigation works remote from the development site will be funded where the need for such works is identified in a Transport Assessment; and so will works associated with a S278 agreement, or planning conditions.

**Policy T2: Active Travel**

A. Measures to join up footpaths/ways and cycle paths/ways into comprehensive networks will be supported with priority being given to:

- A. Encourage walking, cycling and the use of public transport.
- B. Supporting projects as shown in Appendix A.
- C. Maintain and enhance connectivity with;
  - a. the network of public rights of way (bridleways),

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<sup>51</sup> <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/walkingstandards.pdf>

<sup>52</sup> <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/cyclingstandards.pdf>

<sup>53</sup>

[https://www.britishcycling.org.uk/zuvvi/media/bc\\_files/campaigning/BENEFITS\\_OF\\_INVESTING\\_IN\\_CYCLING\\_DIGI\\_FINAL.pdf](https://www.britishcycling.org.uk/zuvvi/media/bc_files/campaigning/BENEFITS_OF_INVESTING_IN_CYCLING_DIGI_FINAL.pdf)

<sup>54</sup> <https://www.gov.uk/government/publications/manual-for-streets>

b. local green spaces.

D. Encourage public access across previously inaccessible private land;

- a. Designed so they are adequately lit,
- b. signage is [only used where] necessary,
- c. it is clear to the public that access is permitted.

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.

## Policy T3: Easing Congestion

### Relevant Neighbourhood Plan Objectives:

TO3 - To ensure that new development minimises congestion and air quality impacts of vehicle traffic.

TO4 – To implement a range of innovative transport solutions in the JHHNP and surrounding areas using the Henley Transport Study.

The evidence demonstrates that there is a need to ease congestion as traffic is a particular issue in this Neighbourhood Area which requires greater intervention than already provided by the South Oxfordshire Local Plan Policies and AQMA.

32.27. Since 1997, Henley has had an Air Quality Management Area (AQMA) and results have shown it exceeds air quality standards in terms of nitrogen dioxide. The AQMA is one of only three AQMAs in South Oxfordshire.

32.28. The source of the air quality problem is road traffic, primarily congestion building up along Duke Street, exacerbated by the canyon effect of a narrow road with tall buildings either side. As part of the AQMA, SODC continues to monitor NO<sub>2</sub> (nitrogen dioxide emissions) at their various monitoring points around the NA, including the town centre. The LAQM 2020 Annual Status Report states that there was an exceedance recorded in Henley AQMA located at 4 Duke Street, which recorded an annual average of 49 µg NO<sub>2</sub>/m<sup>3</sup> which exceeds the EU and UK threshold of 35 40 micrograms/cubic metres. The five-year trend of NO<sub>2</sub> levels in the district and within Henley AQMA continues to be a decreasing one, but some of the monitoring sites in Henley have registered higher concentrations than in 2018

32.29. Easing Congestion will help with air quality issues in the NPA.

32.30. The Transport Study (2015) recognises that Henley suffers from traffic congestion at peak times, with issues at Henley Bridge along the A4130 back to Remenham Church Lane and traffic through the Town Centre. The Study (2015) also recognises that some congestion in the town centre is down to HGVs loading, servicing or delivering in peak periods. Although the Addendum (2021) recognises that there has been a reduction in road traffic volume between 2015 and 2019. There are some exceptions, notably on Fair Mile A3130 (AM and PM) and Marlow Road (PM) which indicate an increase in traffic levels between the given dates. 2021 data was used to show that Covid-19 has significantly impacted the use of roads in the area, highlighting the unprecedented nature of transport at present due to the pandemic. Traffic conditions will need to be monitored to determine any permanent changes to travel patterns.

32.31. The Transport Survey undertaken in May 2021 highlights the impact of congestion, with 60% of respondents finding traffic levels unreasonable or unmanageable. Both the Transport Survey and Community Survey request better provision for cycling and walking, as well as 29% of respondents to the Community Survey saying that they don't walk and cycle more because they feel unsafe. 49% of respondents to the Community Survey say they would like to walk more and 41% would like to cycle more. The survey shows that 55% of people think that air pollution and vibrations from heavy goods vehicles are an issue that needs addressing.

32.32. Oxfordshire Freight Strategy sets out the strategy for freight network between 2015 and 2031. The strategy acknowledges that the bridge to Henley is an environmentally sensitive area. It states that 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 including 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.

32.33. Oxfordshire County Council are currently reviewing the Local Transport Connectivity Plan (LTCP)<sup>55</sup> for the long term strategy for Henley-on-Thames and has published several consultation papers which relate to active travel including on cycle streets, greenways, walking and cycling infrastructure plans, low traffic neighbourhoods etc. The vision sets the direction for transport in Oxfordshire and outlines a clear long-term ambition for transport to 2050.

32.34. The SODC CIL has now been in place since 2016, which includes a Charging schedule and Regulation 123 list. The Regulation 123 list states that infrastructure projects to be funded through CIL on transport will be strategic highways or transport infrastructure and that section 106 will continue to fund site specific transport infrastructure including any works necessary for vehicle, cycle and pedestrian access and/or public transport on or adjacent to the site as a result of the development. Mitigation works remote from the development site will be required where the need for such works is identified in a Transport Assessment; as well as works associated with a S278 agreement, or planning conditions. Mitigation works necessitated due to the traffic generation of a development is therefore likely to be delivered through s106 rather than CIL.

**Policy T3: Easing Congestion**

A. 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:

- a. they will not severely adversely impact on traffic congestion in Henley Town Centre or at key junctions within the town or wider plan area, achieved through appropriate mitigation as necessary; and
- b. 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.

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<sup>55</sup> <https://consultations.oxfordshire.gov.uk/connect.ti/localtransportconnectivity/consultationHome>

## Policy T4: EV Charging Points

### Relevant Neighbourhood Plan Objectives:

TO3 - To ensure that new development minimises congestion and air quality impacts of vehicle traffic.

TO4 – To implement a range of innovative transport solutions in the JHHNP and surrounding areas using the Henley Transport Study.

TO5 – to enhance vehicle and car park management, exploring opportunities for additional town centre parking, encouraging use of the station car park, potentially use of a digital car park management system and support schemes which encourage electric vehicles. To reduce vehicle movements both on the edge of town and in the town centre.

The evidence illustrates that a policy is required, to go further than what is required in the Local Plan, as additional evidence has been published since the adoption of the Plan.

32.35. The UK Government has announced their intention for all new cars and vans to be effectively zero emission by 2030 and of hybrid cars and vans in 2035.<sup>56</sup> Government 2020 announcement towards net-zero with end of sale of new petrol and diesel cars by 2030<sup>57</sup>;

32.36. The Clean Growth Strategy 2017<sup>58</sup> and Clean Air Strategy 2019<sup>59</sup> sets out the government intention for growing the national income while cutting greenhouse gas emissions. The Principles of the National Infrastructure Commission – National Infrastructure Assessment 2018<sup>60</sup> sets out the aim of revolutionising road transport stating that the government needs to provide the right environment to support and encourage the switch to electric vehicles. To catalyse this, consumers need to feel confident that they can charge their electric vehicles en route across the country. A core network of fast or rapid chargers should be installed in visible locations across the UK.

32.37. A Government Consultation 2019 on Electric vehicle charge points in residential and non-residential buildings<sup>61</sup> is proposing to:

1. alter building regulations for new:
  1. residential buildings to include requirements for electric vehicle chargepoints
  2. non-residential buildings to include requirements for electric vehicle chargepoint infrastructure
2. introduce requirement for existing non-residential buildings to have electric vehicle chargepoint

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<sup>56</sup> <https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit>

<sup>57</sup> <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

<sup>58</sup> <https://www.gov.uk/government/publications/clean-growth-strategy>

<sup>59</sup> <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>60</sup> [https://nic.org.uk/app/uploads/CCS001\\_CCS0618917350-001\\_NIC-NIA\\_Accessible-1.pdf](https://nic.org.uk/app/uploads/CCS001_CCS0618917350-001_NIC-NIA_Accessible-1.pdf)

<sup>61</sup> <https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>

- 32.38. Other national level evidence is available on the health effects of air pollution, such as: Air Quality a Briefing for Directors of Public Health<sup>62</sup> and Royal College of Physicians ‘Every breath we take the lifelong impact of air pollution’ (2016)<sup>63</sup>.
- 32.39. The South Oxfordshire District Council Transport Topic Paper states that new development can help minimise the impacts of this car travel by, for example, providing infrastructure to enable charging of plug-in and other low-emission vehicles from the outset.<sup>64</sup>
- 32.40. Henley Town Council and South Oxfordshire District Council have both declared a Climate Emergency. The Climate Emergency 2030 Working Group were established, they have been working with local residents to reduce the carbon footprint of the Council and the town. They have many existing projects planned for the future, including ways to improve air quality and quality of life.
- 32.41. Before declaring a climate emergency the Climate Emergency 2030 Working Group did the following:
- established Henley Town’s carbon footprint (on a pro rata basis to that of SODC);
  - identified three strategic pillars on which to progress towards a zero-carbon target for Henley Town - **moving to clean energy** by developing sources of renewable energy; **reducing demand** by reducing existing demand and emission levels; and **absorbing carbon** by developing land use programmes to absorb emissions;
  - identified potential initiatives under each of these three pillars, and established both the likely cost of these initiatives and their impact on the Town’s carbon footprint;
  - developed a timing plan for these initiatives and a source of funds plan to deliver these initiatives – the timing plan has a target of 2030 by when the full project plans would be in place, with implementation of these projects taking place before and after 2030, depending on aspects such as planning;
  - identified four initiatives (described as “low hanging fruit”) that could be implemented quickly at no cost to deliver reductions in emissions and to demonstrate to residents and businesses that the Town Council is committed to reducing emissions; and defined the need to establish a Community Energy Society to deliver more large scale emissions reduction initiatives; all four initiatives being ready to proceed in the early months of 2020.
- 32.42. Current chargepoint provision (excluding any private provision) is shown on <https://www.zap-map.com/live/>
- King’s Road Car Park
  - Tesco Superstore
  - Henley Business School
  - Badgemore Park
  - David Bray Motor Engineers Ltd
  - HiQ &Castrol Henley

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<sup>62</sup> [https://www.local.gov.uk/sites/default/files/documents/6.3091\\_DEFRA\\_AirQualityGuide\\_9web\\_0.pdf](https://www.local.gov.uk/sites/default/files/documents/6.3091_DEFRA_AirQualityGuide_9web_0.pdf)

<sup>63</sup> <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

<sup>64</sup>

[https://data.southoxon.gov.uk/ccm/support/dynamic\\_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA](https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA)

- 32.43. As private home-owners with off street parking take up EV, peer-to-peer charging may become publicly available through booking services such as Zap-Home and bookmycharge.
- 32.44. OEVIS describes local authority plans including an aspiration to convert 7.5% of local authority managed public car park spaces, to fast or rapid EV charging by 2025, which will mainly contribute toward the need for destination charging, although there is an expectation of access for resident overnight charging (OEVIS EVI 4)
- 32.45. The Town Council has joined the Central Southern Regional Framework for Electric Vehicle Charging Infrastructure. This Framework has been procured through OJEU (Office for the Journal of the European Union) by Hampshire County Council and means that local authorities across Berkshire, Devon, Dorset, Hampshire, Isle of Wight, Oxfordshire, Surrey, West Sussex and Wiltshire do not need to undertake a further supplier procurement process, as it has already been completed.

#### **Areas with the greatest deficiencies**

- 32.46. Reference 1 identifies substantial shortfall in provision of EV chargepoints particularly in light of the fact that the OEVIS (reference 2) identifies Henley as an EV hotspot.

#### **OEVIS**

- 32.47. 'At the end of August 2020, there were 4,381 ultra-low emissions vehicles (ULEVs) in Oxfordshire, 2,200 of which were BEVs. Socio-economic factors mean Oxfordshire is likely to have faster growth in EV sales than the national average; research from the University of Oxford indicates that EV sales are likely to reach approximately 70% of new vehicle sales by 2025 (Figure 2). In absolute numbers, the university's predictions mean that by 2025 there could be over 25,000 EVs on Oxfordshire's roads, and over 44,000 by 2027.'
- 32.48. The CE2030WG on-street parking survey lists streets with greatest future need for on street charging and the work is summarised in reference 1.

#### **Locations most suitable for new provision**

Capacity of the grid (OEVIS Table 1 page 12)

- 32.49. Discussions are ongoing between the TSG Electric Vehicle sub group and our areas' District Network Operator, Scottish and Southern Energy Networks, about upgrades to the local network that will be required to ensure the grid has the capacity to meet the anticipated need for chargepoints.

#### **Private homes, workplaces, other hubs and on-street**

- 32.50. The implication of OEVIS policies (OEVIS p4-5) is that private homes will retrofit to provide a substantial proportion of domestic charging need, and explicitly that new homes will be able to provide chargepoints (EVI 7-9). Workplaces, public car parks, other hubs and on-street charging also have policies to enable provision of chargepoints. As described in reference 1 there are about 1400 homes in Henley that will need on-street charging in order for those households to have access to electric vehicle ownership.

#### **Pilot of gully solution**

32.51. OCC is due to invite residents to join a pilot study of a particular solution to on street charging – cable gullies. A resident in Niagara Road has expressed an interest and we await the outcome. CE2030WG is concerned (reference 1) that gullies have practical limitations that mean they are not suitable for many Henley homes eg terraced housing.

#### **On Council owned land**

32.52. OEVIS Policy EVI 3 calls for 7.5% of LA car parks to have chargepoints by 2025, but some of the Town Council car parks eg Mill Lane do not have an electricity supply.

32.53. Based on the recommendation of CE2030WG, R&A resolved (30 June p33-67) to request a 100% supplier-funded proposal for EVCP from Joju at three of ten potential sites. The Town Council are in final contract negotiations for four chargepoints at Mill Meadows Car Park.

#### **Henley Car Club**

32.54. Currently has two non-plugin hybrid cars, and it is likely that any additional future cars would be battery electric vehicles (R&A minutes 1 Dec 2020). It is hoped that this pay-as-you go car sharing model will reduce the number of chargepoints required because a smaller number of shared cars will be required.

#### **Hydrogen fuel cells**

32.55. A note about the hydrogen fuel cell alternative. On 17 August 2021 the government published its hydrogen strategy.

32.56. It looks like in the medium term, to 2030, that for hydrogen, the government is focussing on energy-intensive industries like chemicals, oil refineries, power and heavy transport like shipping, HGV lorries and trains. Oxfordshire Fire Service are trialling hydrogen fuel cell fire engines. The press release talks about the government analysis suggesting that 20-35% of the UK's energy consumption by 2050 could be hydrogen-based.

32.57. Whilst it's not possible to predict exactly what new technology might achieve, at the moment the government does not seem to be thinking of hydrogen as the future of personal powered transport.

#### **Policy T4: EV Charging Points**

A. Proposals for development should include, where practicable, appropriate provision for electric vehicle charging points taking account of best practice. 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.

B. Proposals should specify the type of charge points to be installed. This should be in line with the OCC Standards in Oxfordshire Electric Vehicle Infrastructure Strategy (2020-2025).

C. For developments, details of how the required electric vehicle charging points will be allocated, located and managed should be included within the relevant Transport Assessment or Transport Statement. The management of the charging points, including the mechanism/procedure for taking payments, will be the responsibility of the developer/occupier.

D. In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those

facilities to be suitably provided in other locations including public car parks or on-street parking spaces (with overnight parking restrictions in place) or designated areas.

E. All building conversions, refurbishments and extensions, should be designed to improve resilience to the anticipated effects of climate change. New charging points including infrastructure to enable retrofitting will be supported as part of these applications.

F. New charging points will be encouraged in new and existing car parks to meet the needs of residents and tourist visiting the NPA.

## Policy T5: Public Transport

Relevant Neighbourhood Plan Objectives:

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.

TO3 - To ensure that new development minimises congestion and air quality impacts of vehicle traffic.

TO4 – To implement a range of innovative transport solutions in the JHHNP and surrounding areas using the Henley Transport Study.

32.58. The Community Survey showed that public transport links were highly rated as a consideration for new housing. 41% of respondents would like to use the bus more and 31% would like to use the train more. Frequency of services was cited by 56% of respondents as a barrier to increased bus usage.

32.59. Sustainable Transport Study for New Developments – part of the Evidence Base for SODC's Local Plan 2035 by Steer Davies Gleave - cites 776,282 entries and exits for Henley station in 2015-16, with 9% of the resident working population using rail to travel to work. The report states 'The challenge is to ensure that the station's sustainable transport facilities (i.e. cycle parking) keep pace with demand, so that new residents can use the railway for their journeys to work and other leisure journeys.'

32.60. This results in recommendation TDM2: Development of station travel plans to support increased awareness of sustainable travel options for journeys to the station, and monitoring of the need for additional station facilities. Each station travel plan developed will include an action plan identifying the capital and revenue schemes required to support increased levels of sustainable travel to and from the station, e.g. more cycle parking / improved cycle parking facilities.

32.61. The Network Rail Western Route Study from 2015 predicts a 99% increase in rail passengers using Henley by 2043<sup>65</sup>. Although over 2020-21 usage will be reduced due to the Coronavirus pandemic, it is anticipated that coupled with the increasing pressure on the climate and policy encouragement to use public transport rather than private cars, together with the move to prohibit the sale of petrol and diesel cars from 2030, more residents will be turning to the train for travel.

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<sup>65</sup> <https://cdn.networkrail.co.uk/wp-content/uploads/2016/11/Western-Route-Study-Final-1.pdf>

32.62. The Government's Future of Mobility Report from 2017<sup>66</sup> states 'External modelling suggests further growth in passenger rail demand of 45-66% up to 2040, allowing for constraints' (Blainey and Preston, 2016, Transport systems assessment. In: Hall J.W., Nicholls R., Tran M. and Hickford A.J. (eds) *The Future of National Infrastructure: A System-of-Systems Approach* (pp. 88-113). Cambridge: Cambridge University Press.). Similarly, the Department for Transport estimates a 48% growth in passenger journeys, and growth of around 60% in passenger-km. (The first Department for Transport figure was estimated using the Exogenous Demand Growth Estimator (EDGE) model, the second using the National Transport Model (NTM).) The expected social and technological changes taking place over the next 20-30 years could also significantly change rail demand. The report goes on to cite environmental considerations as a driver for young people's attitude to transport, as well as increased interest in 'usership' rather than 'ownership', hence an inclination to a sharing economy. Linked with moves elsewhere in Europe (France) to ban short haul flights (<https://www.bbc.co.uk/news/world-europe-56716708>) and encourage the use of rail transport, this can be taken as an indicator of the direction that transport use will move in. OCC's LTP4 states 'If we continue to see the same proportion of sole-occupancy car journeys in the future, we will simply not be able to accommodate the trips that people want to make.' LTP4 Overall Strategy p9.

32.63. It is essential that the public transport network is integrated to create connected networks between places where goods and people need to go. Transport infrastructure in Henley and Harpsden will comprise a range of public transport; bus routes and stops, walking routes, cycling networks, roads, potential park and ride, and railway station that all need to work and connect together.

32.64. Bus travel uses less road space per person than car use. We would like to promote the use of the bus service within Henley and the continued use of the train services to provide sustainable transport options.

32.65. The Henley Town Bus Service was reinstated by the Town Council following the removal of funding by Oxfordshire County Council from local bus services in 2016. It provides a much appreciated route around the town, where the geography of Henley can make it possible to walk downhill into the Town Centre, but less easy to walk up the hill again. The current service links the outer edges of the town with the town centre and provides stops close to the railway station and at the hospital, as well as in the heart of the town. In the six months from October 2020 to March 2021, 2500 passengers were carried, despite the Coronavirus pandemic.

32.66. Both the Community Survey carried out in early 2021 and the Transport Survey carried out in May 2021 affirm the support and necessity of improved public transport provision. With 60% of respondents to the Transport Survey considering traffic and congestion in Henley and Harpsden to be unreasonable and/or unmanageable, it is not surprising that bus timetables and access to business, shops and leisure pursuits is viewed as

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/780868/future\\_of\\_mobility\\_final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780868/future_of_mobility_final.pdf)

neither suitable nor good. Respondents identified the need for more frequent services and improved routes.

- 32.67. The Regulation 123 list contains generic types of infrastructure that may be funded using CIL receipts, with the exception of specific on-site infrastructure or direct mitigation measures and specifically of the strategic development sites.
- 32.68. Exclusions (to be secured through S106 and other statutory provision) include; site specific transport infrastructure including any works necessary for vehicle, cycle and pedestrian access and/or public transport on or adjacent to the site as a result of the development. Mitigation works remote from the development site where the need for such works is identified in a Transport Assessment.
- 32.69. The 2020 Air Quality Annual Status Report (ASR)<sup>67</sup> South Oxfordshire District Council set out measures which have been put in place to improve the air quality within the district. Additional measures include:
- Providing personalised travel planning
  - School and workplace travel planning
  - Bus route improvements (such as providing RTP1)
  - Promoting low emission public transport
  - Car and lift sharing schemes
  - Car clubs
- 32.70. Projects to support improvements to the quality of public transport:
- New Bus Stops, shelters etc to serve new developments
  - Buses – access to bus stops, cycle racks near bus stops, integrated ticketing
  - Review road crossing facilities near main bus stops eg Reading Road
  - Improvement of bus waiting facilities eg Town Hall and Townlands Hospital (ie centre for shopping and access to health care. Townlands covers both the hospital and the doctors’ surgeries)– information screens, shelter, seating
  - Extension of car club
  - Electric bike charging points
  - Traffic modelling work to identify possibility of shared space, wider pavements, removal of street furniture, possible one way system
  - Extension of AQMA across town centre. Only covers Duke Street currently, but measurement via diffusion tubes is ongoing. More funds for diffusion tubes.
  - Improve signage for Long Stay car parks – safeguard availability of long stay car parks
  - Walking Signage to identify routes and times into Town Centre. In association with Walkers are Welcome and SODC
  - Identification and appropriate signage for cycling routes across the town
  - Environmental Weight Limit to restrict HGVs coming through the town and thereby making it a more comfortable environment for walking and cycling
  - School Streets – consult and consider the possibility of introducing this for the streets around schools in Henley

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<sup>67</sup> [Create Graph, South Oxfordshire District Council - Air Quality monitoring service \(airqualityengland.co.uk\)](https://www.airqualityengland.co.uk)

**Policy T5: Public Transport**

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.

B. 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.

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.

D. Development will be expected to show how it is contributing to meeting this policy via planning obligations.

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.

## Policy T6: Parking and Standards

### Relevant Neighbourhood Plan Objective:

TO5 – to enhance vehicle and car park management, exploring opportunities for additional town centre parking, encouraging use of the station car park, potentially use of a digital car park management system and support schemes which encourage electric vehicles. *To reduce vehicle movements both on the edge of town and in the town centre.*

The evidence demonstrates the need for a policy to seek adequate vehicle and cycle parking as part of new development. To ensure that car parking facilities are not lost within the town. This policy may need to be reviewed over time to provide for new initiatives in line with climate change and low carbon objectives.

- 32.71. Henley has a higher level of car and van ownership against England, 78% of households had a car/van in 2018 according to ONS. The combined impact from infill development and change of use have all contributed to the inadequate provision of off-street parking. The problem is exacerbated by the number of terraced houses in Henley-on-Thames where owners have more than one car. At present we have Residents Parking areas in and around the centre of the town with some 350 spaces, yet we have over 500 parking permits allocated to residents.
- 32.72. For many years planning permission has been granted in Henley-on-Thames for residential properties when insufficient off-street parking has been allowed for, this has caused the roads in and around the centre to be at capacity throughout the day and evening. One of the biggest problems is where permitted development and change of use applications have been granted to turn space above shops in to flats and with no spaces available for parking.
- 32.73. Whilst it is recognised that Henley is a sustainable location with access to public transport, many residents still rely on cars for many journeys and many people from surrounding villages need to travel to Henley for access to services and facilities.
- 32.74. The South Oxfordshire Local Plan Transport Topic Paper 2019<sup>68</sup> sets out the process and evidence the District Council has undertaken to produce and inform the Transport Policies. It acknowledges that in areas (outside the built up areas such as Didcot and Oxford) that the car will remain an important way for residents to access facilities and services.
- 32.75. The Local Plan paragraph 6.6. states the policies contribute towards our vision and objectives which seek to build on opportunities for sustainable travel. They have been informed by relevant evidence, including our Evaluation of Transport Impacts work. However, they recognise that the rural nature of the district means that many residents will still be dependent on car travel for some or all of their journeys, and this is reflected in the policies.

## Policy T8: Parking and Standards

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[https://data.southoxon.gov.uk/ccm/support/dynamic\\_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA](https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1038265824&CODE=E3B28F03DACE4F819CEC8BECC6AA84FA)

A. Development will be permitted where adequate vehicle parking facilities and cycling parking are provided by the developer to serve the needs of the proposed development. Development proposals should provide sufficient parking spaces to avoid inappropriate on-street parking, highway safety problems and to protect living and working conditions locally.

B. Development proposals should meet Oxfordshire County Council's minimum parking standards.

C. Parking needs to be carefully considered as part of the wider scheme and designed appropriate for the site. Vehicle and cycle parking should be integrated as a key element of design in development layouts to ensure good quality, safe, secure and attractive environments. Proposals will be expected to comply with the requirements of the South Oxfordshire District Council Design Guide.

D. 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.



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Joint Henley and  
Harpsden  
Neighbourhood Plan

Topic Paper 5

# Infrastructure

*September 2021*



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### 33. Disclaimer

- 33.1. 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. It is intended to provide an insight into how the plan has climate and environmental issues as a golden thread throughout the document.
- 33.2. 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.

### 34. Wanted – Your Views

- 34.1. Henley Town Council and Harpsden Parish Council invites representations on its Draft Neighbourhood Development Plan (known as the “Joint Henley and Harpsden Neighbourhood Plan” (JHHNP). This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.
- 34.2. The consultation period runs from 20 September 2021 to 1 November 2021.
- 34.3. During this consultation we are consulting on the draft plan and associated evidence base. The Neighbourhood Plan Committee wants to gather the views of all stakeholders, particularly those who live, work, or do business in Henley and Harpsden.
- 34.4. 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.
- 34.5. 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

### 35. How to do this?

- 35.1. All responses to this consultation must be received prior to the end of the consultation period which is midnight on 1 November 2021. Responses must include a name, address and - if relevant - the organisation you are representing.

**We would prefer it at all possible that comments are made using an online feedback system – you can do this at: <https://jhhnp.org.uk/>**

- 35.2. However, you can also collect a hard copy of the feedback form from Henley Town Hall. Please return your completed form to the location you collected it from.

## 36. Purpose

- 36.1. The purpose of this topic paper forms part of the evidence base to inform the new Neighbourhood Plan in relation to the current infrastructure position and capacity. 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’. This stage of the report will outline the state of infrastructure provision in Henley and Harpsden.
- 36.2. 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.
- 36.3. The background papers are:
1. Paper 1 - Environmental, Sustainability and Climate Change
  2. Paper 2 - Housing
  3. Paper 3 - Retail, Town Centre and Economy
  4. Paper 4 - Transport
  5. Paper 5 - Infrastructure
- 36.4. These background papers can be downloaded from the Joint Henley and Harpsden Neighbourhood Plan website <https://jhnp.org.uk/>.

## 37. Introduction

- 37.1. Henley Town Council and Harpsden Parish Council are preparing a new Neighbourhood Plan. This will set out the key elements of the planning framework for Henley and Harpsden covering the period 2020 to 2035. Once ‘made’ it will replace the existing Joint Henley and Harpsden Neighbourhood Plan (JHHNP) which came into force in April 2016.

- 37.2. The review is necessary due to the requirements set out in the new South Oxfordshire District Council Local Plan which was adopted in December 2020. This includes delivery of new homes and employment land, meeting affordable housing needs and addressing environmental issues such as air quality. The Neighbourhood Plan needs to be reviewed to ensure it is up to date and able to continue strongly influencing planning decisions.
- 37.3. The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Henley and Harpsden, that is the South Oxfordshire Local Plan. Throughout the document, for each Neighbourhood Plan policy, the relevant policies from this plan are referenced.

## 38. Vision & Objectives

- 38.1. The vision statement for the revised Plan embeds a commitment to environmental sustainability (tackling climate change) and states that: **“In 20 years’ time, Henley on Thames and the surrounding village of Harpsden will have a sustainable community, meeting the needs of current and future generations who live and work here and for visitors where possible. The community will be resilient in its capacity to address the likely impact of climate change whilst still protecting the special qualities of the area.”**
- 38.2. The revised Neighbourhood Plan includes the following social infrastructure objectives:
- SO1 - To ensure that the required health, education, leisure and community infrastructure is in place to accommodate the needs of *all* residents and surrounding parishes.
  - SO2 - To maximise leisure opportunities for all ages, identifying how new mechanisms for delivering new and improved facilities in appropriate locations can be delivered
  - SO3 - To enhance and maintain Henley as a centre of excellence for sports (including rugby, football, rowing, swimming, hockey, tennis, golf, cricket, athletics and other sports).
  - 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.

## 39. Schools, Care for the Elderly, Health facilities, Utilities: Water and Sewage

### Research carried out

- 39.1. In April 2018 the Joint Henley and Harpsden Neighbourhood Plan (JHNP) Committee set up a number of working groups to research a range of issues and to gather evidence to inform the revision of the Neighbourhood Plan of April 2016. Four members of the committee were tasked with researching schools, provision for the elderly, health facilities and utilities. The group met to agree responsibilities for different aspects of the research. A questionnaire and covering letter were drawn up and sent to local schools, care homes, doctors’ surgeries, dentists and utility companies requesting information about current capacity and expectation of being able to accommodate increased demand resulting from additional housing units. Some follow-up visits to schools were made. Private schools were not included in the survey as it was thought that they are likely to respond to market forces.

- 39.2. Enquiries were made with the Oxfordshire CC regarding school places and projections of future demand. LEA planning documents were consulted to collect information relevant to Henley and Harpsden. Relevant documents such as the infrastructure section of SODC Local Plan and SODC Core Strategy Infrastructure Delivery Plan 2017 were included in the group's research. Utility companies were approached for information on current capacity and potential future constraints.
- 39.3. The working group reported its progress to the full JHHNP Committee in May and July and September 2018. Following a workshop with SODC Planning officers at the end of August it was agreed that the working group should produce a topic paper to support the revision of the JHHNP.

## Schools

### Early years and Childcare

- 39.4. While the government plans to introduce 30 hours of free childcare for working families with children ages 3 and 4 from September 2017, local authorities are not expected to deliver provision themselves, but to work with providers (private and voluntary providers) to ensure there is sufficient provision available. No major sufficiency gaps in South Oxfordshire have been identified. *SODC Infrastructure Delivery Plan 2017*. However, in Henley there are now only three places that provide 30 hours funded child care and two of these are full and have waiting lists.

### Primary Schools

- 39.5. There are 5 primary schools in, or close to, Henley – Trinity, Valley Road, Badgemore, Shiplake Primary and Sacred Heart. The town also has 2 private preparatory schools – St Marys and Rupert House. Oxfordshire County Council produces a 'Pupil Place Plan' forecasting pupil numbers and school capacity for every school area within Oxfordshire. OCC estimates extra demand for primary school place arising from housing sites identified in the current JHHNP current plan to be 484 places. This does not take account demand arising from the 95 homes in Shiplake permitted since the calculation of the forecasts in the Plan. Nor does it include potential demand from additional homes built as infill or permitted development.
- 39.6. SODC Infrastructure Plan 2017 plan indicates spare capacity at primary level in Henley of 202 places (17%) across all years. The projected numbers in the SODC Infrastructure Plan 2017 for newly arising demand from new houses to 2033, using the formula of 25 places per 100 houses, estimates a need for 259 places up to 2033. The delivery mechanism for dealing with this increase has yet to be defined. Approximately 700 – 800 new homes should warrant a new primary school. The current spare capacity situation may therefore change as new developments are built.
- 39.7. We confirmed the situation directly with local schools via a questionnaire, which confirmed that whilst Sacred Heart and Badgemore had spare places, Valley Road and Trinity did not. Trinity would be able to expand by building an extra classroom on site if necessary and if funding was available.

### Secondary Schools

- 39.8. There is one secondary school in Henley – Gillotts, which caters for pupils from 11-16. Gillotts (current enrolment 809, capacity 900) has not been full since 2012 and has brought in students from north Reading and the private sector to fill spare

places. There are insufficient pupils at Henley primary and preparatory schools to fill the places available at secondary level. A visit to Gillotts School and discussion with the head teacher, confirmed the figures. The school is under capacity and makes up numbers through transporting children from Reading. SODC Infrastructure Delivery Plan 2017 estimates that 251 additional places will be needed by 2033. The new provision could potentially be met by expansion of Gillotts School.

### **Post 16 Education**

- 39.9. Post 16 education is provided by The Henley College. The Henley College, awarded Beacon status in 2010, the highest accolade in the post 16 sector, by the Department of Education, was formed in 1987 by the amalgamation of King James' College and the South Oxfordshire Technical College. Its history dates back much further however, to 1604 when King James 1 founded a free Grammar School and 1609 when Dame Elizabeth Periam founded a vocational Charity School. The College provides a wide range of academic and vocational courses for post-16 learners. It attracts students from a wide geographic area with students traveling in by bus and by train. Students come from Berkshire and Buckinghamshire and the catchment area in South Oxfordshire extends to Wallingford. The college operates from two sites and a recently completed sports hall has been built at a cost of £2 million. However, as noted in the Baseline Report for the JHHNP made in 2016, there are still many buildings that need improving or replacing.

### **Special Education needs and Disability**

- 39.10. The SODC Infrastructure Plan 2017 describes provision in the area: units in local primary and secondary schools together with a specialist school, Bishopswood, at nearby Sonning Common.

### **Care for the elderly**

- 39.11. At the moment Henley is well provided with a range of residential options for older people: independent living, assisted living, managed care and those that deal with specialised care categories. There are age restricted properties and a number of alms houses. In most cases the age restricted homes offer non-residential management staff and Careline alarm services. There are additional places in the surrounding area. A survey done by the Henley NP Oversight group in March 2017 shows a total of 483 units of accommodation for the elderly (care home places, sheltered housing, nursing care, retirement living) in Henley or just across the Henley Bridge.
- 39.12. Since the JHHNP was accepted, new facilities have been built or are planned. One of the sites designated for regular housing with 40% affordable housing units was allowed change of use to privately owned flats for the elderly with facilities for residents and an optional range of care at extra cost (Albert Court). Another site designated in the JHHNP for housing was refused permission to change to elderly care, and lost an appeal against the decision (former Youth Centre on Deanfield Avenue).
- 39.13. Oxfordshire County Council have confirmed that they are not seeking more care beds in Henley and Harpsden as demand is decreasing, particularly due to the Covid-19 pandemic. They have confirmed there is a need for extra care housing in Henley but that would be C3 use class with people living in their own self-contained flats, with communal facilities provided.

## Health and Social care

### GP Surgeries

- 39.14. There are two NHS doctors' surgeries in Henley - The Bell and the Hart surgery. Both 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.
- 39.15. **The Bell Surgery** believes it could deal with finding clinical room for extra staff by room sharing by part time GPs. They would be happy to consider extending the premises if NHS funding were available.
- 39.16. **The Hart Surgery's** current NHS list is 10,400 and maximum capacity is 11,000. If numbers were to be greater than 11,000 the surgery would need to employ 1-2 more GPs and 1 nurse/health care assistant. Every additional 1000 patients requires 0.5 GP and some nursing time. Premises are almost at capacity so an extension to the building would be needed. This could be done if funding were to be made available.

### Community Nursing

- 39.17. The SODC Infrastructure Delivery Plan, 2017 has identifies a growing demand for the services of community nursing teams causing pressure on the service. Oxfordshire CCG have reported that there is a high number of district nurse vacancies in the area round Henley-on-Thames. Clearly additional development in Henley and Harpsden will add to the pressure on these services.

### Dentists

- 39.18. There are several private and NHS dental surgeries in Henley. The NHS surgeries were sent a questionnaire and were visited. All said that they could take on extra patients now or by employing extra staff. Private surgeries were not visited on the assumption that market forces would allow them to expand if demand increased.

### Pharmacists

- 39.19. The SODC Infrastructure Delivery Plan 2017 quoting the pharmaceutical needs assessment found that pharmaceutical provision meets the needs of the current population and no requirement for additional pharmacy premises was found.

### Hospitals

- 39.20. A range of hospital services are provided by Townlands Memorial Hospital. The Hospital is approximately a 15-20 minute walk from Henley Railway station. Completed in March 2017 the new hospital is well liked by staff and patients.

Services provided include:

- c) Rehabilitation and palliative care for people who no longer require the services of an acute hospital but require greater support than currently provided in their home environment.
- d) A dedicated team of nurses, occupational therapists and physiotherapists and support from medical teams. Staff work closely with social services to source care placements and liaise with other care agencies.

- e) In addition to its inpatient beds, the hospital has a [Minor Injuries Unit](#) (MIU), a range of outpatient clinics (provided by Royal Berkshire NHS Foundation Trust), X-ray facilities (provided by Oxford University Hospitals NHS Trust), and a [rapid access care unit](#) (RACU)
- f) The RACU unit will provide a next-day service led by a consultant and a team of health and social care professionals including community nurses, physiotherapy and occupational therapy practitioners, social care staff, mental health staff and hospital clinicians.
- g) This Hospital has Neurology and Dermatology Departments which are managed by [Royal Berkshire NHS Foundation Trust](#)
- h) It offers Care Home beds and outpatient services

#### Utilities: water and sewage

- 39.21. Thames Water is the statutory water supply and sewage undertaker for SODC. The way water and wastewater infrastructure will be delivered has changed since the 2016 JHHNP was published. From 1 April 2018 all off site water and wastewater network reinforcement works necessary as a result of new developments will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater requirements will be funded through water companies' investment programmes which are based on a 5 year cycle, the Asset Management Plan process.

#### **Sewage treatment Works capacity in Henley-on-Thames / Harpsden**

- 39.22. The area is served by the Henley Treatment Works. Thames Water anticipate that this sewage works has adequate capacity to manage current and forecast growth until 2025. Should further growth come forward, the company wish to be informed at the earliest opportunity so they can update their projections to upgrade infrastructure as and when required.

#### **Electricity**

- 39.23. An assessment done for SODC Infrastructure Delivery Plan 2017 shows that the majority of new housing developments will be able to be served by the existing electrical network at a 33/11kV level and that no upgrades are required in the Henley area.

#### **Gas**

- 39.24. Southern Gas were consulted by SODC in 2017 on the estimated gas demand from new developments. Southern Gas are currently assessing their networks ability to support updated proposed developments. They cannot give firm proposals until they get confirmed developer requests. As with water, should alterations be required, needs must be established early to allow time for the necessary works.

#### **Area of Concern**

- A) At the current time it appears that local primary schools can absorb more pupils, but this may change rapidly when the numbers are recalculated to take into account all of the new housing provision including infill and permitted development.
- B) Prospective pupils are lost each year to the grammar schools in the neighbouring counties and to the independent sector, with some pupils transferring from state primary schools at the age of 11 to independent schools joining pupils from Henley's two preparatory schools.

- C) Some of the buildings on the Gillotts site are old and need replacing to provide a good quality teaching and learning environment.
- D) The college needs to continue to attract students from the wider area and across county boundaries in order to be able to continue to offer the wide range of courses and a high quality experience for all students. Budget cuts are hitting the sector as a whole.
- E) An increase in population could lead to an increase in demand for special education services. New and expanded facilities which could include specialist resources in expanded mainstream schools might well be needed.
- F) Fear that the age profile in the town will become even more unbalanced as more 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. The vision of Henley as a vibrant prosperous mixed community could become impossible to achieve.
- G) There is extensive competition to get staff for existing care home and assisted living homes which is likely to lead to an increase in wages and therefore cost to residents. Most staff come from outside Henley as they cannot afford to live in Henley so have to travel to work increasing existing problems with traffic congestion, parking and poor air quality.
- H) There is some concern about the cost of the privately owned properties and the service charges. There is also concern about the high maintenance costs, particularly with the new buildings, which may reduce the uptake of such properties and make them financially unviable.
- I) Although capacity is sufficient to meet current needs, additional development could lead to a need for expansion of services which could only be met by extending the present premises. Where the funding for such an expansion would come from is not clear.
- J) Thames Water have concerns regarding wastewater network services in the area. Upgrades to the existing drainage structure are likely to be required to ensure sufficient capacity is in place to serve development.
- K) Thames Water have particular concerns for the area west and southwest of Henley where there is cluster of developments predominately on sites with foul water assets only, an area in which wastewater infrastructure is operating very close to capacity.
- L) In response to the current planning application (P19/S2350/FUL) at the Fairmile, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal.

#### 40. Library

- 40.1. 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:
- a. Books in a variety of format
  - b. (Newspapers and magazine)
  - c. Books in other languages
  - d. Audio books
  - e. eBooks and eAudio
  - f. DVDs
  - g. Free Wi-Fi
  - h. (Music CDs) Music library
  - i. Computers and Internet
  - j. Local studies collection

- k. Bus pass, Blue Badge, (resident parking validation services) and EU settled status assisted service.
- l. A3/A4 printing and copying
- m. (Bookable Digital helper sessions )

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

## 41. Community Halls

- 41.1. 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.
- 41.2. 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.
- 41.3. The SODC Infrastructure Delivery Plan, part A 2017 states that there are currently no shortfalls in provision.
  - a) 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.
  - b) 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) – I'm not sure this is hireable – we rent it to a nursery, Harpsden Village Hall, TA Centre and Over Sixties Social Club.
  - c) 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.
  - d) 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.
  - e) 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.
  - f) 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 Baptist Church and Sacred Heart Parish Hall.
  - g) The Chantry House is used as a church hall with a variety of activities and is also available for hire.
  - h) 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.

- i) Henley Baptist Church runs d:Two, a community centre which has a family centre, a community café and bookshop, (a youth and community project) the Nomad community project and Food Bank. Rooms are available for hire
- j) 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.

41.4. Several Community halls were either fully or partially closed during the periods of Covid 19 restrictions but they have now (August 2021) reopened and bookings are increasing as local groups resume face to face meetings.

## 42. Indoor and outdoor Sports Facilities

42.1. The two parishes have a number of sports clubs with indoor and outdoor sports facilities.

### **The Henley Leisure Centre**

42.2. **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. A 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.

### **Swimming**

42.3. 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 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**

42.4. The studio hosts -8 classes a week. A range of classes including cardio, circuits, dance, cycling and yoga are offered. Personal trainers are available providing exercise programmes for all areas of general fitness.

## Racquet sports

- 42.5. 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

- 42.6. Following public consultation in the summer of 2019, Henley Town Council is considering 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.
- 42.7. 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 also used by AFC Henley, local schools and organisations.

## Football

- 42.8. *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)

- 42.9. **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.

## Rugby

- 42.10. **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

- 42.11. **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

- 42.12. **Henley Cricket Club** play on Brakspear'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.
- 42.13. **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

- 42.14. **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. Planning permission to install flood lighting on two of their courts has now been granted.
- 42.15. 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

- 42.16. 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.
- 42.17. **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.
- 42.18. 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.
- 42.19. **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.
- 42.20. **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 have been closed due to the coronavirus restrictions.)
- 42.21. **Upper Thames Rowing Club:** Upper Thames Rowing Club was established in 1963 to provide competitive rowing on the iconic Henley reach. The club has a gym, changing facilities and an extensive fleet of top-of-the-range boats. The club updates its Coronavirus guidance in consultation with British Rowing. 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

- 42.22. Badgemore Golf Club: founded in 1972 the club has an 18 hole course and a large clubhouse which can be booked for private functions. FOCUS, a gym and fitness club was opened in 2018.
- 42.23. **Henley Golf Club:** situated in the Harpsden valley the club, which was founded in 1907, has an 18 hole course and a clubhouse which is being extended.
- 42.24. Future golf provision is likely to be provided by the commercial sector and therefore will respond to demand.

### **Bowling**

- 42.25. **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**

- 42.26. 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.

### **Private gyms and fitness studios**

- 42.27. 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, plus others under discussion.
- 42.28. There are a number other smaller private fitness centres and others in sports clubs.

## **43. Parks and recreation areas**

- 43.1. 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.
- 43.2. **The River and Rowing Museum** has a range of attractions, a café, wild life walks and meetings rooms that can be hired out.
- 43.3. **Freeman's Meadow** is an open recreational area off the Fair Mile. It has a recently refurbished children's play area.
- 43.4. **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.

### **Changes since the publication of the JHHNP in 2016**

- 43.5. 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.
- Some new adult outdoor exercise equipment has been installed at Makins Recreation Ground 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

- a) Covid restrictions in 2020 led to closures of most of the leisure and recreational facilities in Henley and Harpsden. The resulting longer term effects of the Coronavirus pandemic are as yet unknown.
- b) 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.
- a) Assuming that all of the gyms and fitness centres reopen once Covid restrictions are lifted There appears to be sufficient provision of gyms and fitness centres 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 that the price of membership puts the facilities out of the reach of many local people.
- b) 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.
- c) 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 Study 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 sited has not been identified.

- a) 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.
- b) 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.
- c) A Priority identified in SODC Draft report is the improvement of existing swimming facilities at the Leisure Centre.
- d) 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. 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.

#### Infrastructure policies for Joint Henley and Harpsden Neighbourhood Plan

Proposed to take the following policies forward from the JHHNP into the new Plan;

##### Policy SCI1: Comprehensive renewal of Gillotts School

The renewal of Gillotts School will be supported subject to it resulting in the provision of alternative sports facilities to those that currently exist.

##### Policy SCI2: Renewal and enhancement of community facilities

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 SCI3: Community Right to Build

Proposals based on the Community Right to Build will be supported.

##### Policy SCI4: Henley College

The redevelopment of Henley College, to meet educational accommodation needs, will be supported.

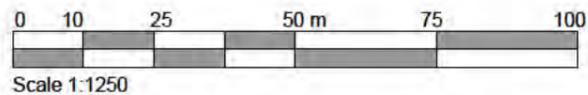
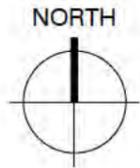


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Joint Henley and  
Harpsden  
Neighbourhood Plan

For further information, or to comment on  
this document, see [www.jhhnp.org.uk](http://www.jhhnp.org.uk)





**ASCOT DESIGN**  
Timeless architecture

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**Planning Application**

**WESTBOURNE HOMES &  
DEBRECQ (Crossways) Ltd.**

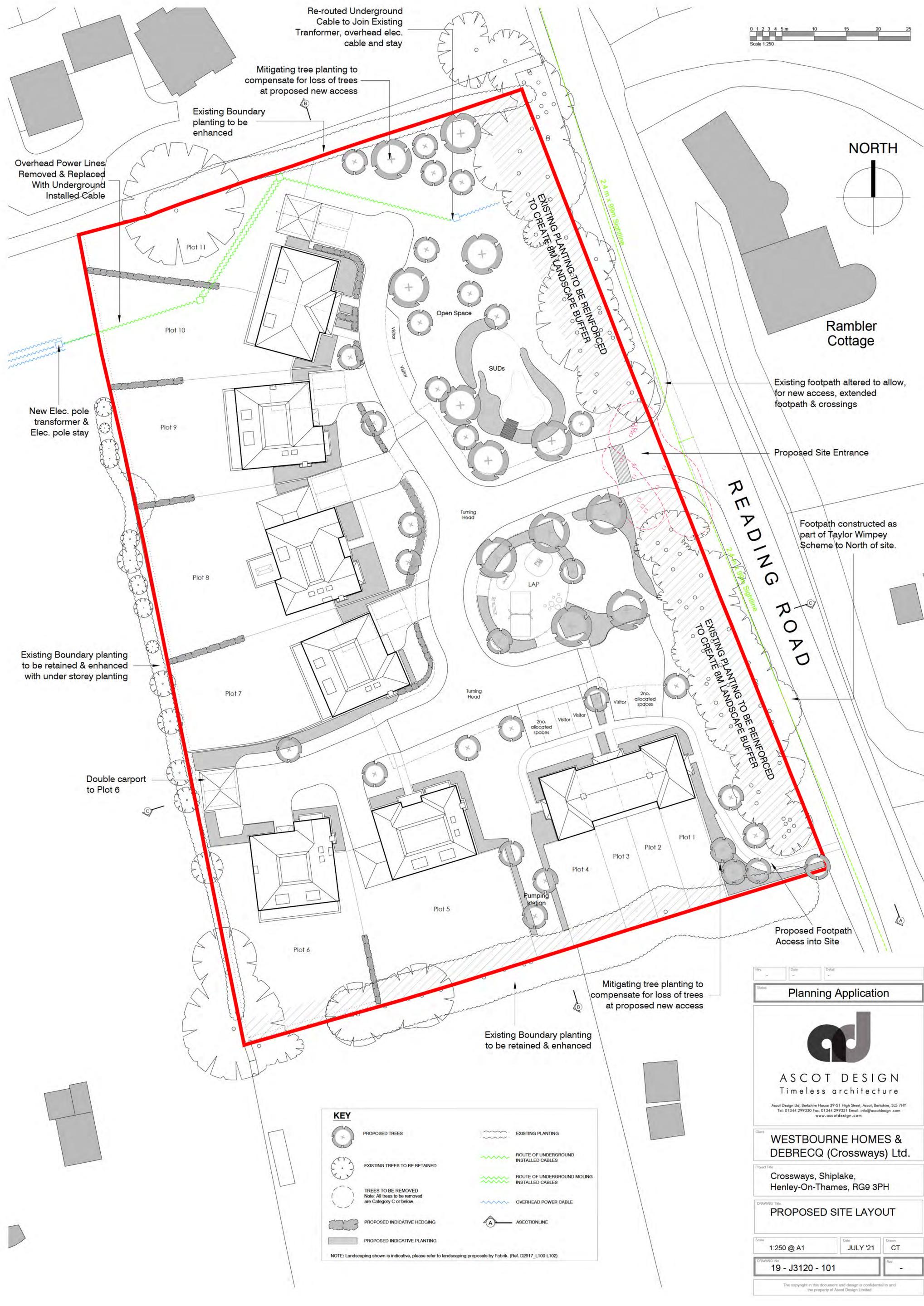
**Crossways, Shiplake,  
Henley-On-Thames, RG9 3PH**

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| Rev: | Date: | Detail: |
|------|-------|---------|

**LOCATION PLAN**

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| Scale:      | Date:    | Drawn: |
| 1:1250 @ A3 | JULY '21 | -      |

|                   |      |
|-------------------|------|
| DRAWING No:       | Rev: |
| 19 - J3120 - LP01 | -    |

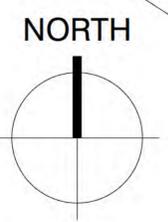
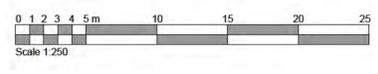


Re-routed Underground Cable to Join Existing Transformer, overhead elec. cable and stay

Mitigating tree planting to compensate for loss of trees at proposed new access

Existing Boundary planting to be enhanced

Overhead Power Lines Removed & Replaced With Underground Installed Cable



Rambler Cottage

Existing footpath altered to allow, for new access, extended footpath & crossings

Proposed Site Entrance

Footpath constructed as part of Taylor Wimpey Scheme to North of site.

READING ROAD

Proposed Footpath Access into Site

Mitigating tree planting to compensate for loss of trees at proposed new access

Existing Boundary planting to be retained & enhanced

**KEY**

- PROPOSED TREES
- EXISTING TREES TO BE RETAINED
- TREES TO BE REMOVED  
Note: All trees to be removed are Category C or below.
- PROPOSED INDICATIVE HEDGING
- PROPOSED INDICATIVE PLANTING
- EXISTING PLANTING
- ROUTE OF UNDERGROUND INSTALLED CABLES
- ROUTE OF UNDERGROUND MOILING INSTALLED CABLES
- OVERHEAD POWER CABLE
- SECTIONLINE

NOTE: Landscaping shown is indicative, please refer to landscaping proposals by Fabrik. (Ref. D2917\_L100-L102)

|   |          |        |
|---|----------|--------|
| Rev   | Date     | Detail |
|   |          |        |
| Status  |          |        |
| Planning Application  |          |        |
|   |          |        |
| ASCOT DESIGN<br>Timeless architecture   |          |        |
| <small>Ascot Design Ltd, Berkshire House 39-51 High Street, Ascot, Berkshire, SL5 7HY<br/>Tel: 01344 299330 Fax: 01344 299331 Email: info@ascotdesign.com<br/>www.ascotdesign.com</small> |          |        |
| Client  |          |        |
| WESTBOURNE HOMES & DEBRECQ (Crossways) Ltd.   |          |        |
| Project Title   |          |        |
| Crossways, Shiplake, Henley-On-Thames, RG9 3PH  |          |        |
| DRAWING Title   |          |        |
| PROPOSED SITE LAYOUT  |          |        |
| Scale   | Date     | Drawn  |
| 1:250 @ A1  | JULY '21 | CT     |
| DRAWING No  | File     |        |
| 19 - J3120 - 101  | -        |        |
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# Response 23

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 23             | <b>Respondent ID:</b> 187269811        |
| <b>Date Started:</b> 17/03/2022 10:32:02 | <b>Date Ended:</b> 17/03/2022 10:37:53 |
| <b>Time Taken:</b> 5 minutes 50 seconds  | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Agent                                   |

## Your comments

| Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below. |
|--|
| Response received via email from Jake Collinge Planning Consultancy on behalf of the Borlase Family.<br><br>Please see attachments.  |

| Q3. You can upload supporting evidence here.   |
|--|
| <ul style="list-style-type: none"><li>• File: JHHNP1~2.PDF</li><li>• File: JHHNP1~1.PDF</li><li>• File: P100SI~1.PDF</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |                                    |
|--|------------------------------------|
| <b>Title</b>                                   | -                                  |
| <b>Name</b>                                    | Jake Collinge                      |
| <b>Job title (if relevant)</b>                 | -                                  |
| <b>Organisation (if relevant)</b>              | Jake Collinge Planning Consultancy |
| <b>Organisation representing (if relevant)</b> | The Borlase Family                 |
| <b>Address line 1</b>                          | 5 Buttermarket                     |
| <b>Address line 2</b>                          | -                                  |
| <b>Address line 3</b>                          | -                                  |
| <b>Postal town</b>                             | Thame                              |
| <b>Postcode</b>                                | OX9 3EW                            |
| <b>Telephone number</b>                        | -                                  |
| <b>Email address</b>                           | jake@jcpc.org.uk                   |



Joint Henley and Harpsden Neighbourhood Plan

e: [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)

15 March 2022

Dear Sir

**Submission Draft Joint Henley and Harpsden Neighbourhood Plan (the draft Neighbourhood Plan).**

I write with reference to the above draft Neighbourhood Plan.

These submissions have been prepared on behalf of the Borlase Family, who own land at Swiss Farm, Marlow Road, Henley and who have, through the review of the Neighbourhood Plan, promoted land at Swiss Farm (Site ref: 1158) for residential development. For clarity, the extent of Site 1158 is shown in the attached plan (P100), with the site extending to some 2.5 hectares. The site is located a short distance to the north of the town centre, in a highly sustainable and accessible location, well-related to existing built development and is both available and deliverable.

Representations were submitted to the Pre-Submission Draft of the Joint Henley and Harpsden Neighbourhood Plan in November 2021. Attached herewith is a copy of those representations. These representations focussed, in particular, on matters relating to (i) the housing allocations in the Pre-Submission Draft and (ii) the housing site assessment process in the Pre-Submission Draft leading to the housing allocations. The overriding conclusion of those representations was that the Pre-Submission Draft failed to meet the Basic Conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

The draft Neighbourhood Plan has been further reviewed wherein it is noted that, in the context of the nature, scope and extent of the representations made in respect of the Pre-Submission Draft, no material changes have been made to the draft Neighbourhood Plan. Accordingly, the November 2021 representation attached herewith should be treated, with equal force and weight, as a submission/representation in relation to the draft Neighbourhood Plan. That is, the considered view remains that the draft Neighbourhood Plan fails to meet the Basic Conditions.

Jake Collinge Planning Consultancy Ltd | 5 Buttermarket Thame Oxon OX9 3EW | m 07753 502955 | e [jake@jcpc.org.uk](mailto:jake@jcpc.org.uk)

VAT Registration no. 980 2101 50  
Registered in England no. 6723139  
Registered office: 24 Ripon Street, Aylesbury, Bucks, HP20 2JP

Nevertheless, given the conclusions of the modification statement – namely that the modifications would change the nature of the plan – if the subsequent examination proceeds by a Hearing, I would welcome the opportunity to attend and contribute to that Hearing.

Yours Faithfully



**Jake Collinge** BSc (Hons) DipTP MRTPI

enc



Joint Henley and Harpsden Neighbourhood Plan

e: [enquiries@henleytowncouncil.gov.uk](mailto: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.

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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*’<sup>1</sup>.

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 Plan<sup>2</sup>, 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.

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<sup>1</sup> 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.

<sup>2</sup> 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                                       |
| AL - 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 Plan<sup>3</sup>;
- 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.

<sup>3</sup> 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 sites<sup>4</sup>; 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,

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<sup>4</sup> 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 sites<sup>5</sup> 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.

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<sup>5</sup> 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.

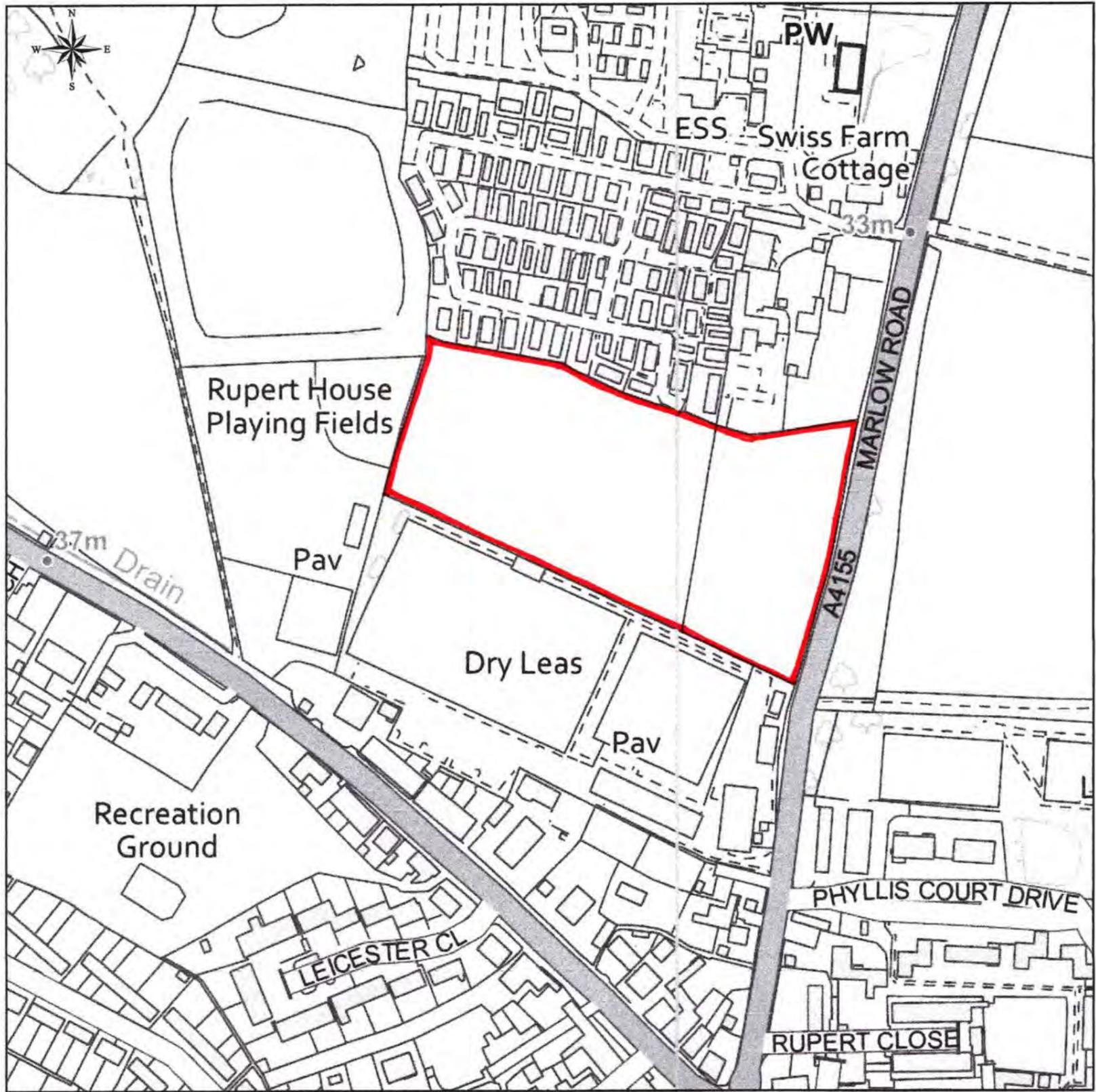
For these reasons, therefore, the draft Neighbourhood Plan is considered to be unsound, with the failings only capable of being addressed through Options 1 and 2 noted above (relating to housing allocations) and a fundamental review, from first principles, of the submitted housing sites against clearly 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



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0m 50m 100m 150m 200m 250m

Scale: 1:2500, paper size: A3

# Response 24

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 24             | <b>Respondent ID:</b> 187271488        |
| <b>Date Started:</b> 17/03/2022 10:38:15 | <b>Date Ended:</b> 17/03/2022 10:54:31 |
| <b>Time Taken:</b> 16 minutes 16 seconds | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Agent                                   |

## Your comments

| Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below. |
|--|
| Response received via email from Barton Willmore on behalf of Crest Nicholson Chiltern.<br><br>Please see attachments.   |

| Q3. You can upload supporting evidence here.                       |
|--|
| <ul style="list-style-type: none"><li>File: 33874A~1.PDF</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |  |
|--|--|
| <b>Title</b>                                   | -                                      |
| <b>Name</b>                                    | Patricia Terceiro                      |
| <b>Job title (if relevant)</b>                 | Senior Planner                         |
| <b>Organisation (if relevant)</b>              | Barton Willmore                        |
| <b>Organisation representing (if relevant)</b> | Crest Nicholson Chiltern               |
| <b>Address line 1</b>                          | The Blade                              |
| <b>Address line 2</b>                          | Abbey Square                           |
| <b>Address line 3</b>                          | -                                      |
| <b>Postal town</b>                             | Reading                                |
| <b>Postcode</b>                                | RG1 3BE                                |
| <b>Telephone number</b>                        | -                                      |
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Freepost SOUTH AND VALE CONSULTATIONS

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33874/A3/PT/MK/slh

16<sup>th</sup> March 2022

Dear Sir/Madam,

**JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN (2020-2035) REGULATION 16  
CONSULTATION - REPRESENTATIONS SUBMITTED ON BEHALF OF CREST NICHOLSON  
CHILTERN**

These representations are submitted on behalf of Crest Nicholson Chiltern in response to the Joint Henley and Harpsden Neighbourhood Plan (2020–2035). Crest Nicholson Chiltern is promoting Northern Field at Highlands Farm, Henley-on-Thames, which is proposed in Policy DS7 as an allocation to deliver a residential led development of around 110 dwellings, employment land, open space, the relocation of the Chiltern Centre, provision of community-led housing, and the relocation of the community centre and the employment facilities from the existing allocation site M, Highlands Farm.

Crest Nicholson Chiltern are in support of the Joint Henley and Harpsden Neighbourhood Plan (2020–2035). Our client further welcomes this opportunity to engage in the neighbourhood plan making process and that Policies DS1 and DS7 support the development the Northern Field at Highlands Farm.

These representations are supported by a Vision Document for the Site prepared by Omega Architects, a copy of which is enclosed.

Our representations seek to assist the Council by responding to individual policies with reference to the basic conditions. In some instances, our representations propose modifications to policy wording.

**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 have 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.

## **POLICY DS7: Northern Field at Highlands Farm (Site M1) including Supporting Text**

### Response to the Policy

Policy DS7 is set out in two limbs. The first limb details the development to be delivered on the allocation site and the second limb talks about the Design Brief for the site. We will consider each limb in turn.

In relation to the first limb of policy DS7, on behalf of our client, we support the site allocation to deliver around 110 new dwellings (point a)) and the provision of publicly accessible open space (point c)). However, we hold some reservations in regard to the wording of policy DS7 which, as drafted, appears to suggest that the relocated Chilterns Centre, community led housing and relocated facilities from site M to the south would be provided in addition to 1ha of employment land. The Chiltern Centre, Community Housing Trust use and Commercial uses are all employment generating and, in our view, can reasonable be considered within the 1ha land requirement. Furthermore, we note that there needs to be enough land available within the site to allow for the delivery of approximately 110 homes within a density that is sensitive to the AONB setting while allowing appropriate provision of landscaping and open spaces areas to create a high-quality environment.

As such, and in the interests of clarity, we would suggest that the wording of Policy DS7 is amended as follows:

**The Highlands Farm site of approximately 7ha (as shown on site location diagram) is allocated for:**

- a) Around 110 new homes;
- b) 1 ha of flexible commercial and community employment land including:
  - (i) relocation of the Chilterns Centre;
  - (ii) provision of 20 no community led housing units;
  - (iii) relocation and redesign of the community centre and the employment facilities from existing allocation site M, Highlands Farm;
- c) Publicly accessible open space.
- ~~d) relocation of the Chilterns Centre;~~
- ~~e) provision of community led housing;~~
- ~~f) relocation and redesign of the community centre and the employment facilities from existing allocation site M, Highlands Farm.~~

Turning into the second limb of Policy DS7 we are supportive of points g), j), i) and k).

With regard to various landscape-related criteria (h), i) and m)), we note that the wording of criterion h) is consistent with the wording of point 1 in Policy ENV1 (Landscape and Countryside) in the adopted South Oxfordshire Local Plan 2035. We further note that criterion i) requires an assessment of the site's impact on the wider environmental and landscape context through a Landscape and Visual Impact Assessment which, for sites located in the AONB such as the Northern Field at Highlands Farm, is also identified in Local Plan Policy ENV1 as a requirement.

We acknowledge and are committed to undertaking an LVIA to inform a future Design Brief and planning application, however, we do not consider it necessary to include criteria h) and i) in Policy DS7 as it duplicates with Local Plan Policy ENV1 (Landscape and Countryside).

We agree that criterion m) should be retained as this provides additional site-specific detail which isn't explicitly covered by Policy ENV1 or other policies.

As such, we would suggest that the wording of Policy DS7 is amended as follows:

*The Design Brief prepared for this site should demonstrate how the proposed development:*

- g) Incorporates and reinforces or reprovides the existing landscaping; Green Infrastructure; and biodiversity features, particularly along the sites northern, southern and western boundary edges;*
- ~~*h) Ensures that the development conserves and where possible enhances the landscape and scenic beauty of the AONB;*~~
- ~~*i) Assesses the impact of the proposed development on the landscape by undertaking a Landscape and Visual Impact Assessment;*~~
- ~~*j) h) Protects and enhances the Scheduled Ancient Monument and its setting within the site;*~~
- ~~*k) i) Protects and enhances the SSSI including a buffer strip on the north side of Highlands Farm Pit SSSI;*~~
- ~~*l) j) Achieves points ~~l~~ and ~~k~~ i) and j) through a geological survey to ensure the Scheduled Ancient Monument and SSSI are protected and to help inform the design of the site; and*~~
- ~~*m) k) Responds to the site's environmental and landscape context, including the AONB and visibility from the opposite side of the valley.*~~

#### Response to the Supporting Text

We support paragraphs 11.24 to 11.26 of the Joint Henley and Harpsden Neighbourhood Plan. In overall terms, we consider development of this site to be available, suitable and acceptable, due to its proximity to a significant number of public services and facilities, which will be further improved as a result of the implementation of Highlands Park. Furthermore, the proposal would incorporate significant commercial / community benefits such as the Chiltern Centre relocation and Community Led Housing.

The proposal would 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 landscape strategy would provide for the strengthening of boundary vegetation, with particular regard to more open views from the Areas of Outstanding Natural Beauty (AONB) to the west, and the creation of a landscape setting to the development incorporating a Village Green. Planting within the site will also break up the impact of development. Footpath links through the site will connect the existing community with the town green, sports pitches and Chilterns AONB.

In our view, the Northern Field at Highlands Farm 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 would provide a new home for the Chiltern Centre along with new employment and community facilities for the local area. On this basis, we are supportive of paragraph 11.28 of the Joint Henley and Harpsden Neighbourhood Plan insofar as a mixed use scheme would be provided.

Paragraphs 11.29 and 11.30 of the Joint Henley and Harpsden Neighbourhood Plan talk about affordable housing and state that the housing development on this site could bring forward approximately 44 additional affordable houses. This is in accordance with Policy H9 of the South Oxfordshire Local Plan 2035, sites located within an AONB will be required to provide 40% affordable housing and, on this basis, we are fully supportive of this position. The Housing Study: to support the development of a Joint Housing

Delivery Strategy for South Oxfordshire and Vale of White Horse, which formed part of the evidence base used to prepare South Oxfordshire's Local Plan, advises that there is an identified need of affordable housing within the District Council. The allocation site would therefore support the District Council in meeting this identified need.

In addition to the 40% affordable housing policy requirement, the proposal would further include the provision of community led housing. As such, the overall provision of affordable housing on site would be over and above the 40% policy requirement. Our client highlights that the community led housing would be in a flatted typology which would assist in meeting the specific needs identified for this tenure, as smaller units are most affordable. The target audience for these homes would be single households under 35 years of age struggling to afford a property in the area.

We further support paragraphs 11.31 and 11.32 of the Joint Henley and Harpsden Neighbourhood Plan regarding the use of an Archaeological and Geological study to inform the pattern and quantum of development suitable for the site.

### **POLICY H1: Design Brief including Supporting Text**

In principle, we support the requirement contained in Policy H1 for all of the allocated sites that a Design Brief must be produced. Similarly, we broadly support the matters listed in the second limb of the policy which the Design Brief should, where appropriate, demonstrate consideration of.

However, in terms of the wording of Policy H1, the first limb could in our view be interpreted as requiring a Design Brief to be produced and submitted with a planning application. In contrast, the supporting text (paragraph 7.1) seeks to achieve engagement between developers and the public at an early stage and "within an agreed reasonable time prior to the submission of any planning application". As such, we recommend that, in the interests of clarity, policy H1 is amended as detailed below.

#### ***Policy H1: Design Brief***

***For all of the allocated sites listed within Policy DS1, applicants should seek to produce a Design Brief for the whole site, setting out the principles for development. ~~on the submission of a planning application.~~***

***Applicants should seek to discuss the content of the Design Brief with Henley Town Council and where appropriate Harpsden Parish Council. Where appropriate the Design Brief should demonstrate consideration of:***

- I. Location, type and management of open space and recreation facilities.***
- II. Location, type and management of landscaping.***
- III. Management, impact and mitigation of views, vistas and adjacencies.***
- IV. Building use, scale, height, density and massing.***
- V. Materials palette.***
- VI. How the development responds to local character.***
- VII. Connecting walking and cycling routes.***
- VIII. Promotion of sustainable development and energy efficiency.***
- IX. Other objectives contained in the relevant site allocation policy"***

Paragraph 39 of the NPPF supports early engagement, which has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community. As such, we are supportive of Stage 1 of the procedure to achieve a Design Brief and find it consistent with the NPPF. We are also supportive of Stage 2 of the procedure.

We are however concerned with the requirements outlined in Stage 3, specifically parts e) and f). In the absence of a prescribed timescale for meeting with applicants and subsequently providing applicants with a Design Brief Position Statement, there is a risk that applicants could be unreasonably delayed from finalising and submitting planning applications for the allocated sites in the plan. We therefore seek modifications to the wording of parts e) and f) to include a prescribed timescale as follows:

*~~"f) Within an agreed reasonable time~~ Within four weeks prior to the submission of any planning application Henley Town Council, Harpsden Parish Council and South Oxfordshire District Council will provide a Design Brief Position Statement to the applicant confirming the satisfactory completion of the Policy H21 Design Brief process. This Position Statement would form the basis of any subsequent statutory public consultation comments made by Henley Town Council and/or Harpsden Parish Council to South Oxfordshire District Council as part of any formal planning application decision making process".*

Furthermore, we query if this is the correct process for the Position Statement to be provided, as this procedure appears to overlap with the pre-application engagement between local authorities and developers as set out in Section 4 of the NPPF.

We trust that the above representations are helpful to South Oxfordshire District Council and the examiner appointed to assess the plan.

On behalf of Crest Nicholson Chiltern, we confirm that we would wish to participate in any hearing sessions relevant to the matters raised above if the appointed examiner considers them necessary.

Should you have any queries in relation to any of the above or enclosed, please do not hesitate to contact the writer on 0118 943 0000 or by email – [patricia.terceiro@bartonwillmore.co.uk](mailto:patricia.terceiro@bartonwillmore.co.uk).

Yours faithfully,

PT

**PATRICIA TERCEIRO**

Senior Planner

Enc.

cc. S. May - Crest Nicholson Chiltern  
N. Daruwalla - Crest Nicholson Chiltern

# NORTHERN FIELD HENLEY-ON-THAMES

Vision Document  
March 2022



**CREST**  
NICHOLSON



**Omega**  
Architects

# 01 Introduction

This Vision Document has been produced by Crest Nicholson Chiltern to support the allocation of the Northern Field in the Joint Henley and Harpsden Neighbourhood Plan. The site will be available, suitable and acceptable.

This document provides an assessment of the site and its characteristics, informing the basis of initial designs which seek to build on the principles established through the draft allocation and enhance the sites connectivity with the local area.

## Vision for Northern Field, Highlands Lane

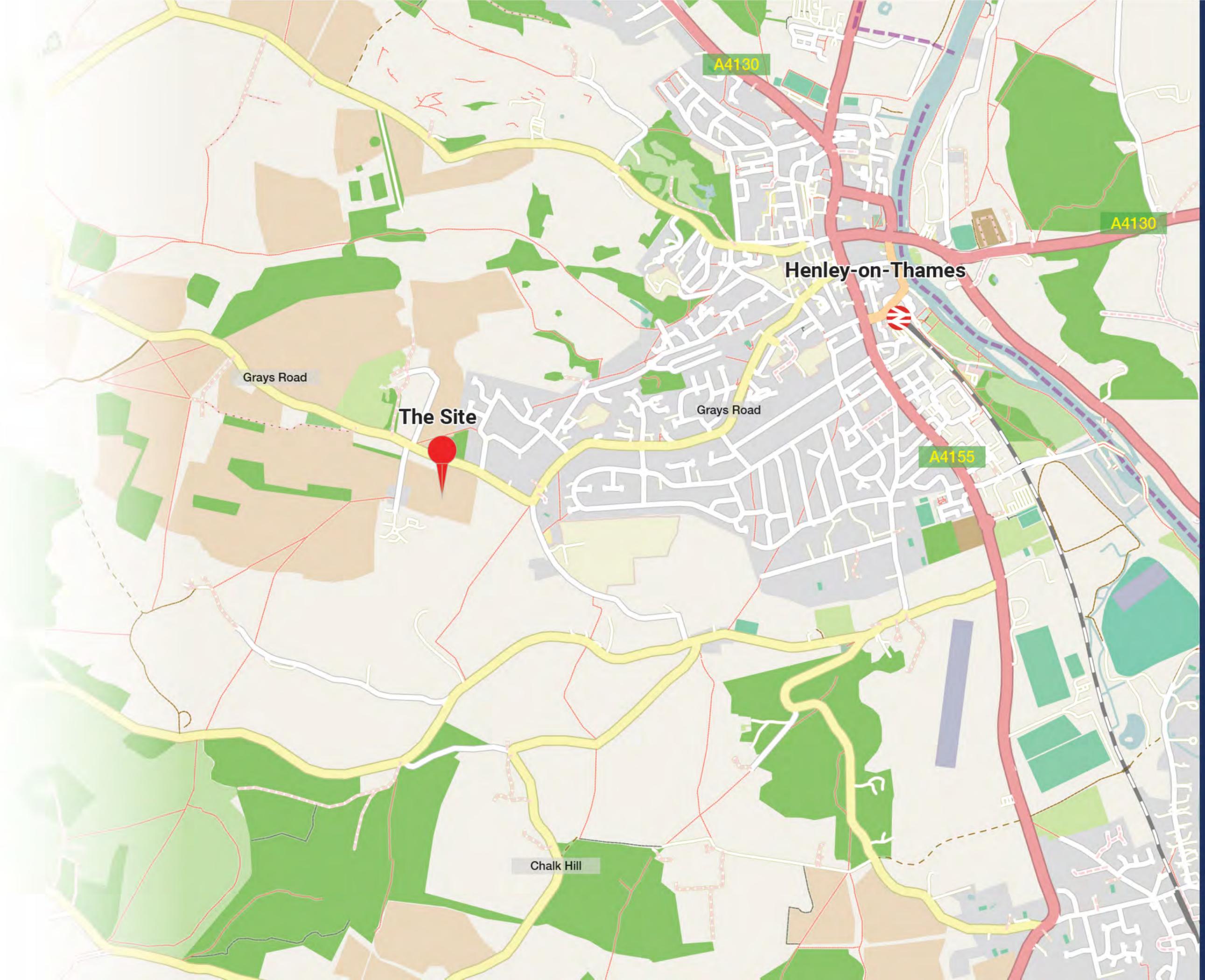
The vision for Highlands Farm is to deliver a vibrant, well balanced small community within Henley and Harpsden. As well as delivering much needed homes, this development would provide considerable benefits to the existing environment and the nature of traffic on the highway network.

## Scheme Benefits

The main scheme benefits arising from the proposals are:

- Delivery of around 110 high-quality new homes.
- 1 ha of flexible commercial and community land including:
  - Relocation of chiltern centre
  - Provision of 20 community led housing
  - Relocation and redesign of community centre and employment facilities from existing allocation site M
  - Publicly accessible open space
  - Ecological enhancements





# 02 Site Context

## Highlands Farm Development

The proposed new development in the northern field will be designed to be complimentary to both the existing development to the south and the wider area context.

The existing development employs a material palette that utilises detailing such as red stock bricks with feature brick detailing, natural stone facades and dark timber boarding.



# 03 Concept



# 04 Sketch Layout

## Northern Phase, Highlands Park Indicative Masterplan

### Legend

- 1 New landscaped site entrance
- 2 Community Land Trust, Circa 20 units
- 3 Location of employment area / community facilities to be swapped as per the Masterplan
- 4 Views from opposite dwellings mitigated with existing hedgerow
- 5 Commercial units
- 6 Chiltern Centre
- 7 Views from opposite dwellings screened by existing tree belt
- 8 Access to Town Green, Gillots school and Henley leisure centre
- 9 Consented Highlands Park Scheme
- 10 Green buffer to offset development from existing properties
- 11 Community orchard and growing garden
- 12 Existing Highlands Farm Entrance
- 13 Open space green buffer
- 14 Existing hedgerow
- 15 Landscaped pond area
- 16 Open green space
- 17 SSSI & Landscaped Woodland Walk
- 18 Access to Highlands Park



# 05 Community Benefits



## Integrated Community

An extension to the existing neighbourhood at Highlands Farm, that will incorporate a number of community and recreational uses within an integrated masterplan that complements this expanding settlement edge of Henley-on-Thames.



## Community Benefits

Provision of key community uses including the relocation of the Chiltern Centre, Community Led Housing trust, employment opportunities and extended open space to promote healthy living.



## A Mixed Neighbourhood

New homes offering a varied mix of housing providing a range of smaller entry level family homes to mid/ large family homes and including the provision of 40% affordable housing.



## Landscape-led Masterplan

Incorporation of existing landscape assets and key views to the wider area within an attractive, green landscape framework of streets and spaces.



## A Sustainable Location

Delivery of a site with immediate access to key transport routes, and opportunities to encourage modal shift towards sustainable transport methods through integration with surrounding routes and integration of movement corridors within the development.



## High Quality Design

New buildings delivered to a high standard of design, seeking to complement the rich character and historical influences found in Henley-on-Thames.



The Front Barn  
124 Manor Road North  
Thames Ditton, Surrey, KT7 0BH

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This Vision Document has been prepared by Omega Architects Ltd on behalf of Crest Nicholson Chiltern. Usage of information contained within this report outside of the stated intended purpose by unauthorised parties without prior written consent from Omega Architects Ltd is done so entirely at risk to said parties.

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# Response 25

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 25             | <b>Respondent ID:</b> 187272971        |
| <b>Date Started:</b> 17/03/2022 10:55:31 | <b>Date Ended:</b> 17/03/2022 10:57:15 |
| <b>Time Taken:</b> 1 minute 44 seconds   | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Agent                                   |

## Your comments

| Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below. |
|--|
| Response received via email from LRM Planning Limited on behalf of Bloor Homes Limited.<br><br>Please see attachment.  |

| Q3. You can upload supporting evidence here.                             |
|--|
| <ul style="list-style-type: none"><li>File: 2022-03-16 LRM.pdf</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |                          |
|--|--------------------------|
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**LRM**  
PLANNING  
LIMITED

# JOINT HENLEY AND HARPSDEN NEIGHBOURHOOD PLAN 2020-2035

Submission Version

Representations prepared on behalf of Bloor Homes

March 2022



## 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     | 11/03/22 | Draft  | OJ                |
| B     | 16/03/22 | Final  | OJ                |



## Policy DS1 – Preferred Housing Allocations

### Introduction

1. These representations to the Joint Henley and Harpsden Neighbourhood Plan published in March 2022 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 Proposed Allocations for housing development. These are the same sites as were identified in the 2021 consultation despite the representation made in respect of them at that time.
16. 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.
17. Together, the amount of new housing proposed at these sites totals 377 new homes, of which 145 are additional to existing allocations in the Neighbourhood Plan and existing commitments.
18. 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.
19. 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**

20. Topic Paper 2 suggests that the need for affordable housing over the plan period equates to some 1300 new homes (para 12.1). 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.
21. 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**

22. 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.
23. The Strategic Housing Market Assessment similarly identifies the greatest need for family housing.
24. 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.
25. 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.
26. 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**

27. 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*

28. 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.

29. 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*

30. 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*

31. 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*

32. 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*

33. 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*”.

34. 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
35. 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.
36. 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.
37. 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.
38. Because of this approach, the consultation document is not founded on sufficient and proportionate evidence.
39. 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**

40. The NPPF establishes the Government’s objective to significantly boost the supply of housing land. Plainly this is a constituent part of sustainable development. In this context, and having regard to the evidence of housing need and affordability at Henley-on-Thames, the Local Plan Inspector intended that the Neighbourhood Plan seek to meet demonstrable local needs even where this would result in housing provision in excess of the minimum outstanding requirement. To this end, the Local Plan itself expresses the housing requirement at Henley-on-Thames as a minimum. 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.
41. 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.

42. The Submission Version of the Local Plan does not achieve this. Its housing strategy does not genuinely reflect the extent to which a higher level of housing can be achieved by allocating other suitable development opportunities and that would align better with the evidence as to the type of housing that should be provided.
43. 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 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.
44. 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 an 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.
45. For these reasons, the Neighbourhood Plan does not meet the following basic conditions:
  - a. Having regard to national policies and advice contained in guidance by the Secretary of State;
  - b. Contributing to the achievement of sustainable development; and
  - c. Being in general conformity with the strategic policies contained within the development plan for the area.
46. 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*  
*March 2022*

# Response 26

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 26             | <b>Respondent ID:</b> 187273581        |
| <b>Date Started:</b> 17/03/2022 10:57:23 | <b>Date Ended:</b> 17/03/2022 11:02:22 |
| <b>Time Taken:</b> 4 minutes 58 seconds  | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Individual                              |

## Your comments

|   |
|---|
| <p>Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p> |
| <p>Response received via email.</p> <p>Please see attachments.</p>  |

|   |
|---|
| <p>Q3. You can upload supporting evidence here.</p>   |
| <ul style="list-style-type: none"><li>• File: JB Email.pdf</li><li>• File: TPOSAN~1.PDF</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |                    |
|--|--------------------|
| <b>Title</b>                                   | -                  |
| <b>Name</b>                                    | Julian Brookes     |
| <b>Job title (if relevant)</b>                 | -                  |
| <b>Organisation (if relevant)</b>              | -                  |
| <b>Organisation representing (if relevant)</b> | -                  |
| ██████████                                     | ██████████         |
| ██████████                                     |                    |
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| ██████████                                     | ██████████████████ |
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| ██████████████████                             |                    |
| ██████████                                     | ██████████████████ |

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**From:**  
**Sent:** 16 March 2022 14:42  
**To:** Planning Policy S&V  
**Cc:** Rios, Ricardo  
**Subject:** JHHNP - Consultation - private individual comment  
**Attachments:** TPOs and Priority Habitats.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Sir,

I wish to comment on the JHHNP review submitted to you as part of the consultation process.

[Joint Henley and Harpsden Neighbourhood Plan - South Oxfordshire District Council \(southoxon.gov.uk\)](https://www.southoxon.gov.uk)

My comment refers to page 205, respondent 3c, Woolf Bond Planning on behalf of T Bingham, policy DS1 & ENV 4, and appendix A page 334 second para starting "My client controls ..." of this document: [JHHNP-Consultation-Statement.pdf \(southoxon.gov.uk\)](https://www.southoxon.gov.uk)

The applicant states that "It is understood that this proposal attracted 70% support during the public consultation exercise (as part of the 2016 made JHHNP process)". However, he fails to mention that material information was omitted in this aforementioned consultation process in 2014. This omission is also not mentioned in his response to the Article 14 JHHNP review consultation.

There were at least 3 pieces of omitted material information:

1. The site enjoys a woodland TPO, not on specific trees but on the entire site, TPO 04S06, of which the owner was fully aware since it was referenced in the 2003 appeal decision of which he was the appellant (see para 3 below)
2. The 2006 Natural Environment and Rural Communities Act.  
<https://www.legislation.gov.uk/ukpga/2006/16/contents> The 2<sup>nd</sup> picture on the attached "TPOs and Priority Habitats" shows the local habitats which includes the woodland on this site.
3. The two dismissed planning application appeals, now three since the original JHHNP process and the owner's comments during the JHHNP Regulation 14 consultation.

T/APP/Q3115/A/89/131977/F8 dated 8 June 1990

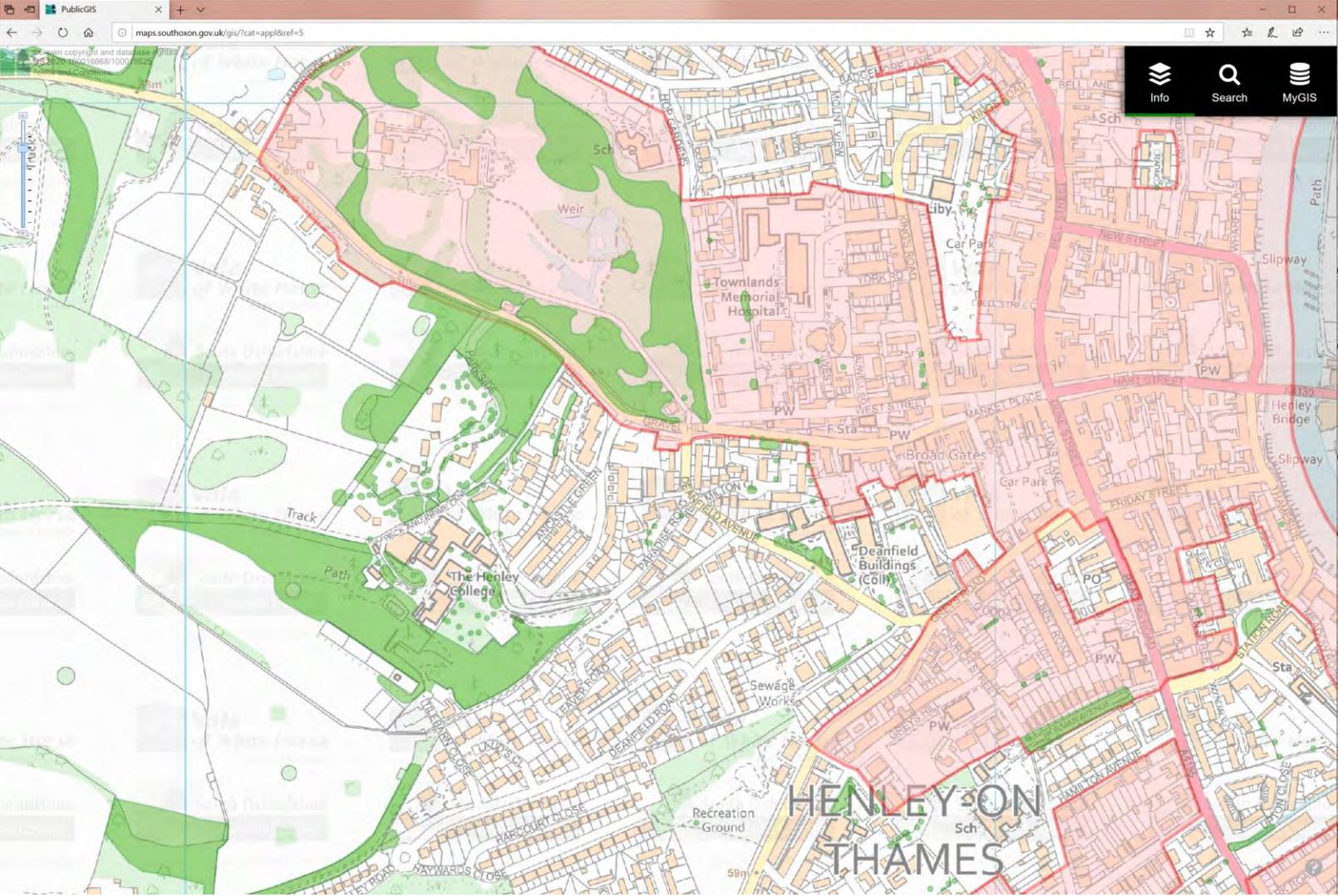
APP/Q3115/A/02/1094881 dated 31 July 2003

APP/Q3115/W/21/3268954 dated 16 November 2021

Therefore the 70% figure is both invalid and misleading.

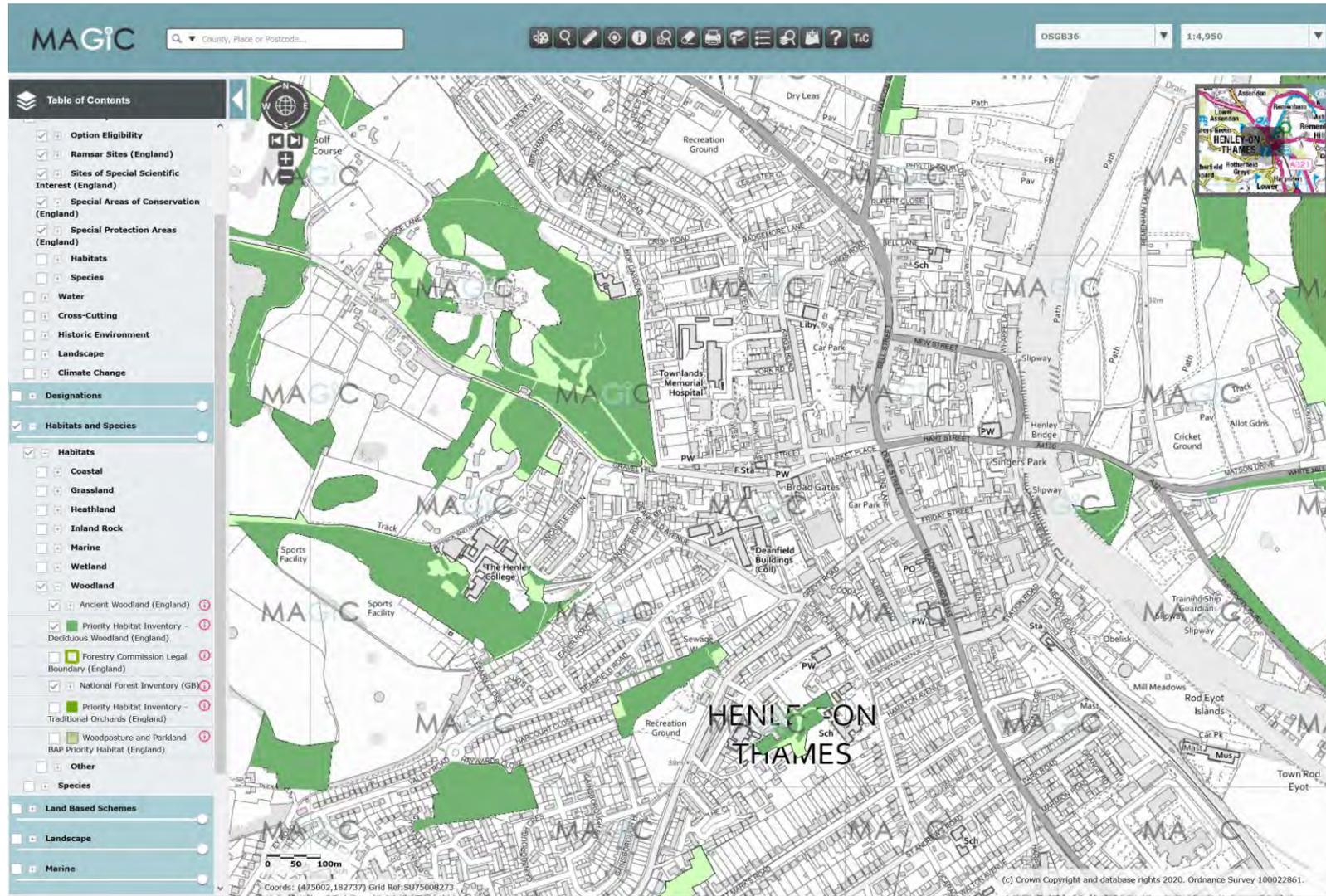
Warmest regards  
Julian Brookes

# Tree Preservation Order areas and trees



Protected trees and woodlands dark green on above map – source SODC website

# Section 41 Priority Habitats (dark green on map)



Deciduous Woodland Priority Habitats dark green on above map – source DEFRA “Magic” website

# Response 27

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 27             | <b>Respondent ID:</b> 187278076        |
| <b>Date Started:</b> 17/03/2022 11:29:26 | <b>Date Ended:</b> 17/03/2022 11:30:32 |
| <b>Time Taken:</b> 1 minute 5 seconds    | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Organisation                            |

## Your comments

| Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below. |
|--|
| Response received via email from Oxfordshire County Council.<br><br>Please see attachment.   |

| Q3. You can upload supporting evidence here.                             |
|--|
| <ul style="list-style-type: none"><li>File: 2022-03-16 OCC.pdf</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |                                       |
|--|---------------------------------------|
| <b>Title</b>                                   | -                                     |
| <b>Name</b>                                    | Sarah Steere-Smith                    |
| <b>Job title (if relevant)</b>                 | Planner                               |
| <b>Organisation (if relevant)</b>              | Oxfordshire County Council            |
| <b>Organisation representing (if relevant)</b> | -                                     |
| <b>Address line 1</b>                          | Oxfordshire County Council            |
| <b>Address line 2</b>                          | County Hall                           |
| <b>Address line 3</b>                          | New Road                              |
| <b>Postal town</b>                             | Oxford                                |
| <b>Postcode</b>                                | OX1 1ND                               |
| <b>Telephone number</b>                        | -                                     |
| <b>Email address</b>                           | Sarah.Steere-Smith@Oxfordshire.gov.uk |

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING  
CONSULTATION:**

**District:** South Oxfordshire

**Consultation:** Joint Henley & Harpsden Submission Neighbourhood Plan 2020-2035

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**Annexes to the report contain officer advice.**

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**Overall View of Oxfordshire County Council**

Oxfordshire County Council welcomes the opportunity to comment on this Neighbourhood Plan and supports the Town Council's ambition to prepare a revised Neighbourhood Plan.

**Officer's Name:** Sarah Steere-Smith

**Officer's Title:** Planner

**Date:** 16 March 2022

---

**ANNEX 1**  
**OFFICER ADVICE**

**District:** South Oxfordshire  
**Consultation:** Joint Henley & Harpsden Neighbourhood Plan 2020 – 2035  
(Submission Document)  
**Team:** Strategic Planning  
**Officer's Name:** Sarah Steere-Smith  
**Officer's Title:** Planner  
**Date:** 15/03/22

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## **Strategic Comments**

We responded to the Pre-Submission neighbourhood plan in November 2021 with a number of recommendations for wording changes and for greater clarity on the green space designation sites. Some of these points have been addressed which is welcomed, but some key points still remain unchanged and thus our response re-iterates and updates our comments made in November 2021.

### **Environmental weight limit**

The County Council welcomes the wording change made in Appendix A which corrects point b, referring to the OCC Cabinet Motion on 7<sup>th</sup> April 2021 to undertake the necessary studies for an environmental weight restriction for Henley (subject to funding). Should funding become available, the results of the studies and other considerations will inform any decision on the implementation of an environmental weight limit. Please see the Transport Strategy comments on page 11.

### **Local Green Spaces designations**

In our Pre-Submission response to this neighbourhood plan we highlighted the need for individual clear plans of the proposed sites. OCC is concerned that some of these proposed sites may include highway land.

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 have 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; we would not want the neighbourhood plan to fetter this ability in any way. 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.

Two of the four sites highlighted in our previous response may impinge on OCC highways land.

### **Site 19 Gillotts Wood**

- potentially impinge on the OCC-owned bridleway running to the north of the proposed LGS 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.

### **Site 21 Corner of Harpsden Road and Sheephouse**

- it is not possible to determine whether this site includes or excludes OCC-owned land within and adjacent to the public highway. The highway land should be excluded from the LGS designations and the LGS boundaries drawn tightly around the wooded areas that they purport to protect.

We welcome the statement in the Consultation Statement (p.148) that "*No Local Green Spaces are located on County Council Land. Agreed, individual maps should be included within the Baseline Report.*" Whilst this is reassuring, good quality individual maps of each site will be essential in order to avoid any risk of confusion in future.

### Further wording/policy recommendations

Amended wording is recommended in our Estates Team response regarding Policy DS5 -Chilterns End and Policy SCI: Comprehensive Renewal of Gillotts School. Our Archaeology team recommend a policy on the historic environment is included in the neighbourhood plan.

We do not request a hearing on this neighbourhood plan, but if one is to be held, we would welcome the opportunity to take part. We wish to be kept informed of any decisions made regarding this neighbourhood plan.

**District:** South Oxfordshire  
**Consultation:** Joint Henley & Harpsden Neighbourhood Plan 2020 – 2035  
(Submission Document)  
**Team:** OCC Estates  
**Officer's Name:** Jeremy Flawn  
**Officer's Title:** Partner Bluestone Planning  
**Date:** 1<sup>st</sup> March 2022

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## **Estates Comments**

### **Local Green Spaces (LGSs)**

It is noted that sites 31 and 35 have now been deleted from the Neighbourhood Plan. The individual maps are indeed now referenced (although only via a link in the Baseline Report to a 'Local Green Space Methodology' dated December 2021). However, the individual maps in that report are no clearer generally, than the overview map which is contained in the Neighbourhood Plan. To be absolutely clear about what is – and is not – included in the designation it is critical that precise Ordnance Survey based plans are provided for each proposed LGS.

Oxfordshire County Council Estates welcomes the statement in the Consultation Statement (p.148) that "*No Local Green Spaces are located on County Council Land. Agreed, individual maps should be included within the Baseline Report.*"

Whilst this is reassuring, good quality individual maps of each site will be essential in order to avoid any risk of confusion in future.

### **Site Specific Comments**

OCC Estates has previously made comment on the following policies / sites at the Pre-Submission stage:

- Policy SCI1: Comprehensive Renewal of Gillotts School
- Policy DS3 (Formerly SP11): Gillotts School Field (SITE C)
- Policy DS5 (Formerly SP4): Chilterns End (SITE F)
- Policy DS7: Highlands Farm North Field (SITE M1)
- Policy DS9: Chilterns Centre (SITE Y)

#### Policies DS7 and DS9 – Highlands Farm North Field and Chilterns Centre

We note that the Steering Group has responded to the comments concerning policies DS7 and DS9 by 'noting' the comments by OCC Estates.

#### Policy DS5 – Chilterns End

In relation to policy DS5 OCC Estates has previously advised that the policy should be revised to provide flexibility.

Revising the policy in the way previously suggested would prevent the County Council from being unable to use the Chilterns End site for operational purposes (ie

Extra Care Housing) due to the Neighbourhood Plan policy only allowing housing on the site. Restricting the site to housing only could prevent the County Council from fulfilling its statutory function in redeveloping the site for care-related development in the event that it is found to be required for that purpose in the future.

In response to comments made by OCC Estates on Policy DS5 the Steering Group has responded in the Consultation Statement, as follows (p.144):

*“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.”*

This response appears not to recognise that the flexibility proposed would help to deliver a potentially larger number of residential units (including ECH) than 27 dwellings which would go even further in helping to deliver housing in the Plan area.

Therefore the previously made representations are reiterated and it is **requested that the policy be amended** so that it provides flexibility, and would read as follows:

*“The Chilterns End site (as shown on site F location diagram) is allocated for either:*

*a) Around 27 residential units developed as traditional dwellings*

Or

*b) up to 60 Extra Care Housing units*

*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.*

*The site is to be made available following the completed development of the Townland’s Hospital with its additional care home facilities. The Design Brief for this site should demonstrate how the proposed development: ~~b)~~ Appropriately responds to the site’s environmental and landscape context, including proximity to the AONB.”*

In either of the two scenarios above, 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 potential to deliver 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.

It should be noted that extra care accommodation can count towards dwelling numbers for the purposes of housing supply. The Planning Practice Guidance website confirms this, advising:

***“How can authorities count older people’s housing in the housing land supply? Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market. Further guidance is set out in Housing for Older and Disabled People. Paragraph: 035 Reference ID: 68-035-20190722 Revision date: 22 July 2019”***

#### Policy SCI1: Comprehensive Renewal of Gillotts School

In relation to this policy OCC Estates has previously sought an amendment to the policy to ensure that the potentially more far-reaching implications of the renewal of the school are not lost in the policy requirements.

The Consultation Statement (p.151) includes the response from the Steering Group:

*“Disagree with proposed changes to this policy. This is a saved policy that has been brought forward from the existing ‘made’ neighbourhood plan.”*

Therefore the previously made representations are reiterated and it is **requested that the policy be amended**, to read as follows:

*“The renewal of ~~loss of playing fields at Gillotts School will be supported subject to it resulting in the provision of alternative sports facilities to those that currently exist~~ 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....”*

**District:** South Oxfordshire

**Consultation:** Joint Henley & Harpsden Neighbourhood Plan 2020 – 2035  
(Submission Document)

**Team:** Oxfordshire County Archaeological Service

**Officer's Name:** Steven Weaver

**Officer's Title:** Planning Archaeologist

**Date:** 21/02/2022

---

## **Archaeology Comments**

Although the neighbourhood plan highlights the heritage of Henley & Harpsden there is no specific policy relating to the historic environment and preservation and enhancement of the parishes heritage assets.

We would therefore recommend that the Neighbourhood Plan is amended to include a specific policy on the historic environment as set out below, that would support its vision objectives and appropriately accord with the NPPF and Local Plan policy.

### **Policy - Historic Environment**

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2021).

**District:** South Oxfordshire

**Consultation:** Joint Henley & Harpsden Neighbourhood Plan 2020 – 2035  
(Submission Document)

**Team:** Access to Learning

**Officer's Name:** Louise Heavey

**Officer's Title:** Information Analyst

**Date:** 25/02/2022

---

## **Education Comments**

Existing education provision within the Henley School Planning Area would be expected to have sufficient capacity for the scale of development suggested as part of the submitted Neighbourhood Plan.

**District:** South Oxfordshire

**Consultation:** Joint Henley & Harpsden Neighbourhood Plan 2020 – 2035  
(Submission Document)

**Team:** Minerals and Waste Policy

**Officer's Name:** Kevin Broughton

**Officer's Title:** Minerals and Waste Local Plan Manager

**Date:** 28/02/2022

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## **Minerals and Waste Comments**

The plan does not affect a Strategic Resource Area, a Mineral Safeguarding Area, or any minerals or waste facilities. Consequently we have no comment to make on the proposed plan.

**District:** South Oxfordshire

**Consultation:** Joint Henley & Harpsden Neighbourhood Plan 2020 – 2035  
(Submission Document)

**Team:** South & Vale Locality

**Officer's Name:** Harry Etchells

**Officer's Title:** Transport Planner

**Date:** 28/02/2022

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## **Transport Strategy Comments**

Thank you for noting that any weight restriction study and implementation needs to be funded by third parties. Within the motion it is suggested that third party funding could be secured through development. However, it is OCC officers feeling that you could not fund a weight restriction from development, in terms of seeking a S106, as it would not meet the three CIL tests as set out below:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

It is also felt that monies collected through CIL and given to either town/parish Council's or OCC cannot be spent on a weight restriction either.

# Response 28

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 28             | <b>Respondent ID:</b> 187278289        |
| <b>Date Started:</b> 17/03/2022 11:30:48 | <b>Date Ended:</b> 17/03/2022 11:34:18 |
| <b>Time Taken:</b> 3 minutes 30 seconds  | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Agent                                   |

## Your comments

| Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below. |
|--|
| Response received via email from Arrow Planning on behalf of Knole Homes.<br><br>Please see attachments.   |

| Q3. You can upload supporting evidence here.  |
|---|
| <ul style="list-style-type: none"><li>• File: APL-346 NP Reqs.pdf</li><li>• File: APPEND~2.PDF</li><li>• File: APPEND~1.PDF</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |                             |
|--|-----------------------------|
| <b>Title</b>                                   | -                           |
| <b>Name</b>                                    | Rafaela Christodoulou       |
| <b>Job title (if relevant)</b>                 | -                           |
| <b>Organisation (if relevant)</b>              | Arrow Planning              |
| <b>Organisation representing (if relevant)</b> | Knole Homes                 |
| <b>Address line 1</b>                          | Clarks Barn                 |
| <b>Address line 2</b>                          | Bassetsbury Lane            |
| <b>Address line 3</b>                          | -                           |
| <b>Postal town</b>                             | High Wycombe                |
| <b>Postcode</b>                                | HP11 1QX                    |
| <b>Telephone number</b>                        | -                           |
| <b>Email address</b>                           | rafaela@arrowplanning.co.uk |

Planning Policy  
South Oxfordshire District Council  
135 Eastern Avenue  
Milton Park  
Milton  
OX14 4SB

Our ref: APL-346 Newtown Road

16 March 2022

Dear Sir/ Madam,

### **Representations regarding Joint Henley and Harpsden Neighbourhood Plan Consultations**

These representations have been prepared on behalf of our client, Knole Homes, in response to a consultation on the Joint Henley and Harpsden Neighbourhood Plan ('JHHNP').

Knole Homes are promoting the land at Newtown Road, Henley-on-Thames, RG9 1HG (as identified on the Plan enclosed at Appendix 1). The land (totalling 0.18 ha) has been the subject of several applications. The Site is currently vacant and comprises hardstanding. The surrounding area comprises a mixture of industrial and residential uses.

The Site has again been identified as an employment site by the Joint Henley and Harpsden Neighbourhood Plan. Policy DS10 Land at Newtown Road identified the Site as Site AD for B1 business activities or other suitable commercial uses. However, the Site has not been historically deliverable for B1 uses, remaining underutilised and vacant.

A Neighbourhood Plan needs to meet the Basic Conditions, which are:

1. The Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State. (e.g., National Planning Policy Framework and Guidance)
2. The making of the Neighbourhood Plan contributes to the achievement of sustainable development.

3. The making of the 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).
4. The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations (particularly, the Strategic Environmental Assessment Directive), Environmental Impact Assessment Directive, and the Habitats and Wild Birds Directives).
5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010), either alone or in combination with other plans or projects.

The allocation of the entire Site for B1 use is not considered appropriate and would not contribute to the achievement of sustainable development, failing the second Basic Condition.

Having reviewed the Henley and Harpsden Neighbourhood Plan Site Assessment (including Addendum 1 and Addendum 2), it is evident that the Site was not assessed by the Town Council and thus not given due consideration. As an allocation, it has simply been “rolled forward” from the previously made Plan, without assessing whether it is a deliverable employment site.

The Site is brownfield land, in a sustainable location, adjacent to both employment and residential uses. It has been marketed and available for employment development for many years, but it has not been delivered as an employment site. This relates to the Site’s relationship with neighbouring land uses (i.e., the adjoining housing) which constrains the ability to deliver sufficient quantum of commercial use on the Site.

This is further evidenced by the change of use of other sites in the immediate vicinity to alternative uses, demonstrating that there is not a strong market or need for commercial uses here.

The Neighbourhood Plan fails to consider whether the Site should be brought forward for an alternative use, e.g., either a mixed use residential and commercial, or straight residential use.

Bringing the Site forward as a mixed-use residential development would help to deliver some of the housing needs for the area on a brownfield site, in a sustainable location. Furthermore, it would make use of a historically underutilised site that has not been brought forward for development, despite a positive allocation identifying it as such. The failure of the Plan and evidence base to consider alternative uses is therefore a failure to contribute to the achievement of sustainable development.

Instead, by maintaining the employment allocation, the likelihood is that the Site will continue to sit vacant. A more positive approach would be to reassess the Site and propose mixed-use development on the Site.

Therefore, it is strongly argued in these representations that the Site should be allocated for mixed-use which will complement the existing uses adjacent to the Site. Accommodating residential uses to the west of the Site will create a cohesive environment and sense of place with the terrace houses across Farm Road. Indeed, it should be noted that historically the western boundary of the site comprised a terrace

of houses fronting Farm Road, which were demolished several years ago (see enclosed Appendix 2).

A mixed-use development can address and interact with the existing built environment efficiently. Such a use will not compete with the character of the area or detract from it; on the contrary it will comprise a unifying element between the existing built forms and promote an inclusive neighbourhood with active frontages.

This proposal is in accordance with the approach advocated in the Development Plan, and more specifically Policy STRAT1, Criterion v) which states the following:

“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”;

and Policy EMP3, Criterion 2 which states that:

“...where there is no reasonable prospect of land or premises being used for continued employment use, a mixed use enabling development which incorporates employment space should first be considered.”

Moreover, the Site is in a highly sustainable location as it is a short walking distance to a range of amenities in Henley- on-Thames, including pubs, the primary school, recreation areas, museum, and shops. The local bus stops are in close proximity and services run regularly to the town centre. Also, the Henley-on-Thames railway station is in walking distance offering good connections to the wider area. Therefore, the Site comprises a suitable location for mixed-use being close to a plethora of local amenities, capable of supporting such uses.

## Conclusion

For the reasons argued above, these representations contend that the land at Newtown Road should no longer be allocated for employment, and instead should be assessed for mixed-use use. Such an assessment, if carried out correctly, is likely to find that the Site should be allocated for a mixed-use residential and commercial use, as advocated by Policies STRAT1 and EMP3 of the Local Plan.

An allocation for residential use would meet the Basic Conditions test (criteria 2), which the Plan currently fails to do so given the failure to assess the Site. Instead, it will not achieve sustainable development as the Site is likely to remain vacant.

We would be happy to meet with both the District and Town Councils to discuss how the Site can be brought forward as a mixed use, or residential development.

If further information is required, please do not hesitate to contact us on the details at the head of this letter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'M.Schull', with a long horizontal flourish extending to the right.

Mark Schull

Encl.

Appendix 1 - Site Location Plan

Appendix 2 - Historical Plan



Gibbs & Dandy Ltd

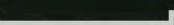
Reading Rd

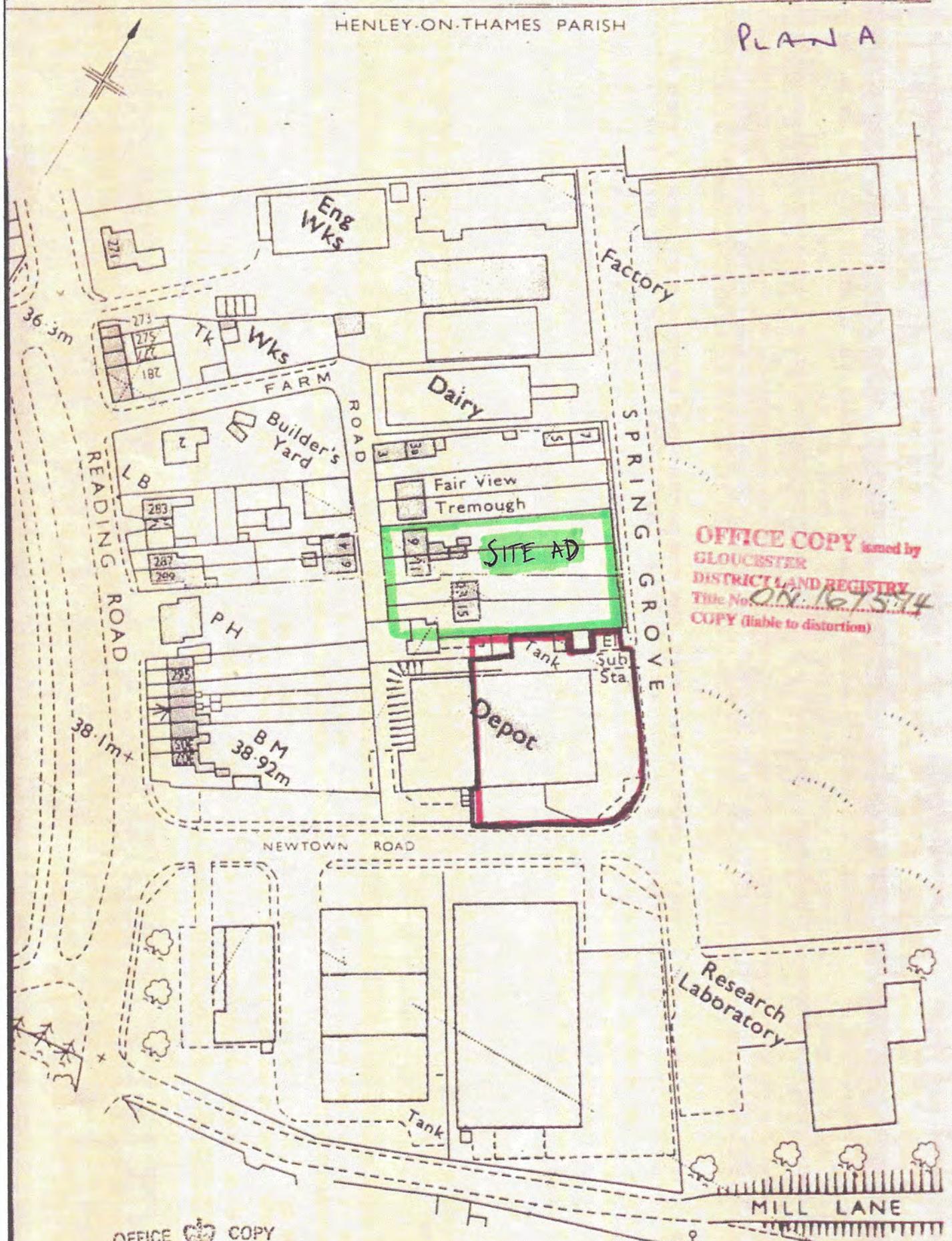
Farm Rd

Newtown Rd

**Site Location Plan**

Newtown Rd, Henley on Thames, Oxon, RG9 1HG

50 m 



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 GLOUCESTER  
 DISTRICT LAND REGISTRY  
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 DISTRICT LAND REGISTRY  
 23 AUG 1993

*[Handwritten signatures]*

# Response 29

## Respondent Details

| Information                              |  |
|--|--|
| <b>Respondent Number:</b> 29             | <b>Respondent ID:</b> 187279055        |
| <b>Date Started:</b> 17/03/2022 11:34:27 | <b>Date Ended:</b> 17/03/2022 11:37:21 |
| <b>Time Taken:</b> 2 minutes 54 seconds  | <b>Translation:</b> English            |
| <b>IP Address:</b> [REDACTED]            | <b>Country:</b> United Kingdom         |

| Q1. Are you completing this form as an: |
|---|
| Organisation                            |

## Your comments

|   |
|---|
| <p>Q2. You can provide your comments on the Joint Henley and Harpsden Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p> |
| <p>Response received via email from South Oxfordshire District Council's Property Team.</p> <p>Please see attachment.</p>   |

|   |
|---|
| <p>Q3. You can upload supporting evidence here.</p>                           |
| <ul style="list-style-type: none"><li>File: 2022-02-23 Property.pdf</li></ul> |

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.

|  |                                    |
|--|------------------------------------|
| <b>Title</b>                                   | -                                  |
| <b>Name</b>                                    | Tim Sonnex                         |
| <b>Job title (if relevant)</b>                 | -                                  |
| <b>Organisation (if relevant)</b>              | South Oxfordshire District Council |
| <b>Organisation representing (if relevant)</b> | -                                  |
| <b>Address line 1</b>                          | 135 Eastern Avenue, Milton Park    |
| <b>Address line 2</b>                          | -                                  |
| <b>Address line 3</b>                          | -                                  |
| <b>Postal town</b>                             | Milton                             |
| <b>Postcode</b>                                | OX14 4SB                           |
| <b>Telephone number</b>                        | -                                  |
| <b>Email address</b>                           | Tim.Sonnex@southandvale.gov.uk     |

---

**From:** Sonnex, Tim  
**Sent:** 23 February 2022 21:08  
**To:** Whiteley, Rosalynn  
**Cc:** Jackson, Jerome; Kerby, Daisy  
**Subject:** Neighbourhood Plans

Hi Rosalynn

I have been asked to review various NPs and to make comment on behalf of the Property team where appropriate. Daisy and Jerome, copied here, have helped with the research on this and our comments, representing the Council as a property owner, are as follows:

### **Henley and Harpsden**

We wish to comment on the following aspects of the NP:

#### **1 Policy DS1, Proposed Allocations**

Site A1 Land West of Fair Mile

Plan from BP showing residential allocation

#### Residential : Site A1 Land West of Fair Mile



11.5. This site is already allocated for residential development in the current adopted Plan but has not been developed. It is proposed to roll it forward into the new Plan period. The site is located between existing development along the Fairmile.

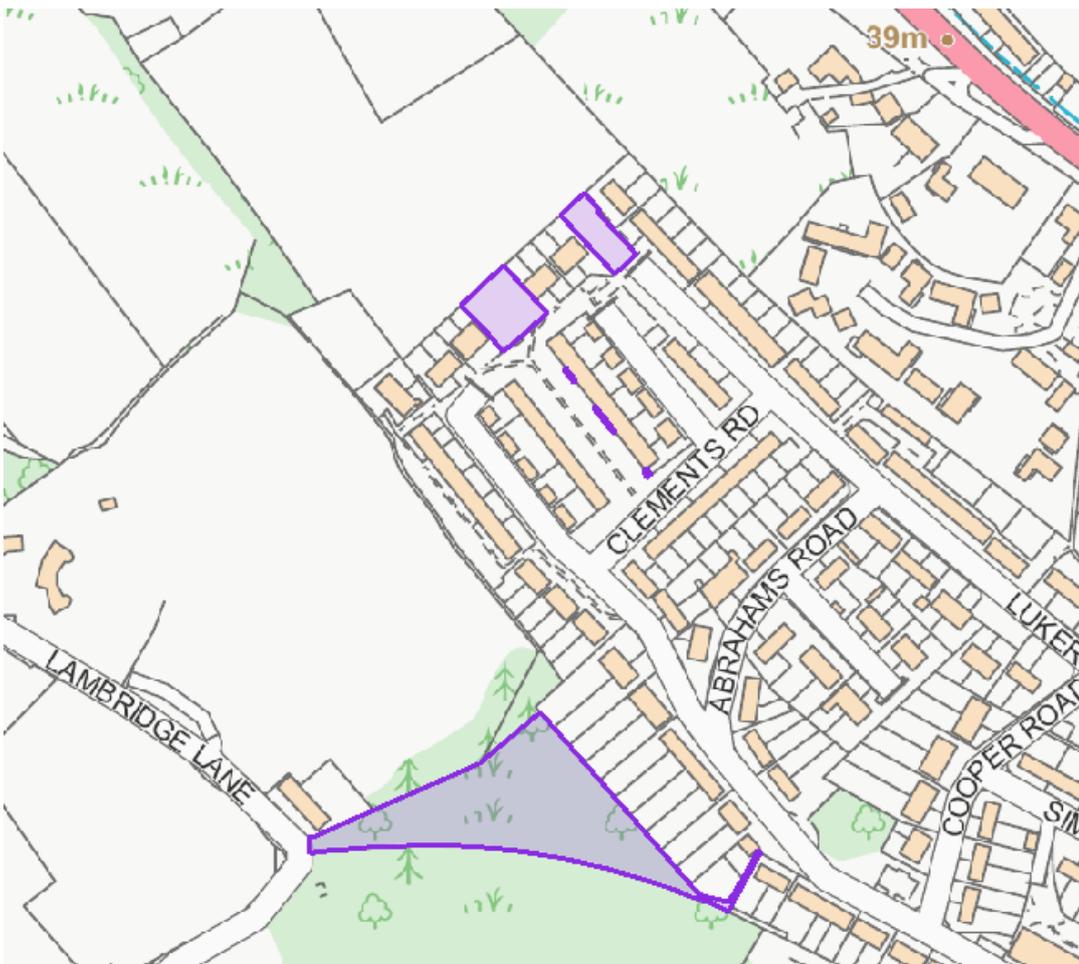
#### **Policy DS2 from NP**

Policy DS2: Land West of Fair Mile (Site A1)

The Land West of Fairmile site (as shown on site A location diagram) is allocated for:

- a) 72 residential units. The Design Brief prepared for this site should demonstrate how the proposed development:
- b) Appropriately responds to the site's environmental and landscape context, including proximity to the AONB and visibility from the opposite side of the valley;
- c) Responds to the heritage context. This includes the location of part of the site within the Henley Conservation Area and its proximity to listed buildings. This should include a sensitive and contextual approach to its density, design and use of materials. A low density development may be appropriate for this part of the site. A sensitive solution to the site's access from the Fair Mile will be required, taking into account its location within the Henley Conservation Area, and should include high quality landscaping;
- d) Delivers new and improved cycle and walking links through the site and to adjacent residential areas;
- e) Provides a high quality green link and biodiversity environment, including any existing on site biodiversity features;
- f) Undertakes a predetermination archaeological assessment to inform the Design Brief, which will also be required with any planning application before the potential impact on below ground heritage assets can be assessed.

Adjacent or nearby Council-owned sites are shown in purple on the following plan:



The comment we wish to make is:

***The Council, as owner of adjacent and nearby land, has not made any commitments at this stage to the use of its land as a cycle/pedestrian link or any other use in support of any Planning application on Site A1.***

For your information, the developer who has made an application for a residential scheme on the site denoted as A1 in the NP has recently approached us to discuss the use of our land to create the proposed cycle/pedestrian link to Luker Avenue and those discussions are ongoing.

## 2 Policy ES4, Empstead Works/Stuart Turner site (Site E)

The following shows the above site and the Council's adjacent car park (in purple):



Policy ES4 states:

### Policy DS4: Empstead Works/ Stuart Turner (Site E)

The Empstead Works/ Stuart Turner site (as shown on site E location diagram) is allocated for:

- a) Around 42 dwellings; and
- b) At least 3,000sqm of town centre mixed uses including employment and 1,500sqm for a single format food store.

The Design Brief prepared for this site should demonstrate how the proposed development:

- 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.

As owner of adjacent land, the comment that we would like to make is:

***The Council, as owner of an adjacent site, would wish to see that any development on this site is of suitable mix and scale and does not impact on any rights of light on its land immediately to the east of Site E.***

We have other owned sites in Henley and Harspden, but none that are materially impacted by the NP.  
Are you able to make these representations on our behalf, or would you prefer that I lodge direct?

**Other NPs**

For information, we have also reviewed the following NPs and have no comment to make, on the basis that the Council does not have any land ownership within the parishes:

Long Wittenham  
Sonning Common  
Tiddington and Albury

Kind regards

Tim

Tim Sonnex MRICS  
**Property Surveyor**  
**Development & Regeneration**  
South Oxfordshire and Vale of White Horse District Councils  
135 Eastern Avenue, Milton Park, Milton OX14 4SB

Mobile 07970 092975

Subject to contract and Without Prejudice. No rights are to be derived from any proposal contained in this email and a contract cannot be deemed granted by the Council unless and until a written agreement containing all necessary terms and conditions is fully negotiated and executed between the relevant parties and the Council has given the necessary authority under the terms of its constitution