

# Revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan - publicity period

## Response 1

### Respondent Details

Information
<div style="display: flex; justify-content: space-between;"><div style="width: 45%;"><p>[REDACTED]</p><p>[REDACTED]</p><p>[REDACTED]</p><p>[REDACTED]</p></div><div style="width: 45%;"><p>[REDACTED]</p><p>[REDACTED]</p><p>[REDACTED]</p><p>[REDACTED]</p></div></div>
Q1. Are you completing this form as an:
Individual

### Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>I have no comment or objection as the correspondence between all parties reflects detailed and rigorous considered views that should be upheld.</p>

### Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:</p>
<p>No, I do not request a public examination</p>

### Your details and future contact preferences



# Response 2

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Contact Details
<b>Name</b> Mr & Mrs Leeke
[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>1. Kidmore End Parish Council's revised version of 'Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan' does nothing to address OCC Highways' recommended Holding Objection; the Parish Council has merely acknowledged their comments.</p> <p>2. Therefore to go ahead with approving the KENDP would be putting the cart before the horse, as no robust solutions have been provided to any of Highways' concerns: in particular, a speed survey to ascertain whether the visibility splays are at all feasible, which is most unlikely given the limitations at that point in the lane; and a drainage survey to ensure the carriageway would not be flooded.</p> <p>3. So all our previous comments submitted to SODC regarding the unsuitability of site CFS8 for 4 dwellings on Highways grounds remains valid, i.e:</p> <ul style="list-style-type: none"><li>• The width of the lane at the proposed point(s) of access for the proposed dwellings is just 3.5m; Highways policies stipulate that the road must be at least 4 metres wide at access points to allow for 2 vehicles to pass.</li><li>• The lane narrows to just 2.2m a few metres north of the access point(s). Highways does not accept developments where significant sections of the carriageway do not allow 2 vehicles to pass, as in this case.</li><li>• The visibility splay is extremely limited in both directions at just a few metres and the lane very twisty, and this is further exacerbated by the mature hedges in both directions. Highways couldn't possibly accept any development that would be impacted by such lack of visibility on entering and exiting the lane at the access point, as this would be a significant danger to users of the carriageway. Their policies would require an access width of 4.8m, which would be very difficult to achieve.</li><li>• With the proposed linear configuration of the dwellings, the turning area within the site would appear to be constrained and difficult to negotiate, so there would be a danger of vehicles reversing onto the lane.</li><li>• The access point is in close proximity to the access point for Butlers Orchard and the narrow lane could not accommodate the resulting extra traffic generated by this site.</li><li>• There is no pavement to the village centre, nor any possibility of constructing one given the narrowness of the lane, particularly at its narrowest point of 2.2m, and the fact that the lane cannot be widened. So pedestrian access to the village school (@ a 6-minute walk; some 0.4kms away) and other facilities would be extremely dangerous.</li><li>• Highways would also have significant issues with gradient at this proposed site.</li></ul>

Q4. If appropriate, you can set out below what change(s) you consider necessary to make the plan able to proceed. It would be helpful if you are able to put forward your suggested revised wording of any text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, please attach these to your response.

Suitable surveys and robust solutions would need to be carried out to satisfy all Highways issues.

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Don't know

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Mr & Mrs
<b>Name</b>	Clive & Veronica Leeke
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	-
<b>Organisation representing (if relevant)</b>	█
█	█
█	█
█	█
█	█
█	█
█	█
█	█
█	█

█

█

█

█

# Response 3

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
--

<p>Ref. Revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan</p> <p>The comments follow APPENDIX D v1.2, Points 1 to 10, also with reference to corresponding Basic Conditions statements.</p> <p>APPENDIX D7 introduction: "This site specific Design Code is supplementary to Policy HDA and allocates the 0.2 hectare site for for up to 4 smaller dwellings. As well as local character and landscape policies, it is intended to illustrate the expected layout, scale, landscaping and access for the site." - Separation of Settlements Policy (LCSS). If CFS8 development proceeds, then LCSS policy will be countermanded: 'Neighbourhood Development Plan to identify a series of locations where settlements are vulnerable to coalescence and where it will be important to maintain their separate physical and visual identities.' Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123 (density), 124-131 (design), 170, 172 (AONBs and landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722 (amenity). - CFS8 is situated on the southern edge of Kidmore End village and its development will be another step in extending the village in the direction of Tokers Green village and coalescence with the greater Caversham/Reading conurbation. - CFS8 development will add to KEPC settlement coalescence, contrary to the 'basic conditions' statement.</p> <p>APPX. D7, Point 1. "Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planning. The requirement for visibility splays should not lead to an open frontage onto Tokers Green Lane." - Safety for All Road Users Policy (LTSRU). Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways) 124-131 (design). NPPG Paragraphs 42-013-20140306 to 42-015-20140306 (transport) and 26-001-20191001 to 26-023-20191001 (design). Under 'Comment for Conformity', the following statement is made: "The criteria contained in this policy echo the national policy objectives for road safety at paragraphs 102-110 of the NPPF, whilst also referencing good practice in designing for rural locations. Both elements of the policy are in general conformity with national planning policy and guidance." - However, on the contrary, there are serious omissions and deviances from LTSRU 'good practice' in the CFS8 development, such as: NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways). - No Transport Statement has been provided in the proposed CFS8 development. This is a serious omission and wholly compromises the scheme, as no traffic / highways safety and/or access analysis has been undertaken. - There is no traffic / highways safety evidence provided. NPPF 124-131 (design).</p>
--

- OCC Highways mapping is unavailable for the Tokers Green Lane southern edge of Kidmore End village.
- Highways access and roadway design for traffic entering and exiting the proposed CFS8 development is absent from the proposal. This is a serious omission
- ENTRANCE / EXIT ROADWAY DESIGN WITH FULL CALCULATION MEASUREMENTS OF SPLAY LINES AND CFS8 VISIBILITY EVIDENCE IS REQUIRED.
- NO TOPOGRAPHICAL SURVEY UNDERTAKEN FOR ACCURATE DISTANCE AND TERRAIN DATA INFORMATION. A FUNDAMENTAL OMISSION.
- NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. NO PLANS DRAWN OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE OF POTENTIAL ACCESS DRIVEWAYS ON/OFF TOKERS GREEN LANE.
- Quiet Lanes Policy (LCQL).

Tokers Green Lane identifies as a 'Quiet Lane'. Development of site CFS8 conflicts with NPPF paragraphs 8 170, 172 (AONBs and landscape), 127 and 180 (amenity).

In recent years, KEPC has worked hard to adopt aspects of the 'Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268'.

Specifically by Kidmore End village speed limit reduction to 20 m.p.h., development of CFS8 on Tokers Green Lane will countermand the excellent work by KEPC and create conflict with Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268, as stated:

'(2) The appropriate national authority may make regulations authorising local traffic authorities who have designated roads as quiet lanes or home zones to make use orders and speed orders of such descriptions as are prescribed by the regulations in relation to any roads designated by them as quiet lanes or home zones.'

APPX. D7, Point 2.

"A well-defined defensible boundary must be provided to the west and south of the allocation as shown on Appx. D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement."

- Local Gap Policy (LPLG).

Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123 (density), 124-131 (design), 170, 172 (AONBs and landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722 (amenity)

LPLG states: "This policy draws on comprehensive landscape and village character evidence in appendices C, D and E to the Neighbourhood Development Plan to prevent coalescence between Caversham and Tokers Green and to protect a narrow gap of vulnerable open land and rural setting next to the urban area of Reading."

The development of site CFS8 therefore clearly conflicts with the Local Gap Policy. Development of CFS8 would clearly create further coalescence between Kidmore End village and Tokers Green and by association on to Caversham.

THE CFS8 DEVELOPMENT WILL CREATE FURTHER COALESCENCE BETWEEN KIDMORE END VILLAGE AND CAVERSHAM.

APPX. D7, Point 3.

"Appropriate frontage planning could include a double row of beech hedges or other native hedgerow species to help screen the development. This could be combined with a low garden wall potentially in brick and flint to match those found in the area."

The D7 sketched map is not based on any survey or Topographically accurate measurements.

- D7 Point 3 vaguely refers to "... could include"; "... could be combined" etc. The Appx. D7 provides a rough illustration of where hedgerows COULD be planted, where an approximate building line .. COULD be situated. Which COULD be combined with a low garden wall POTENTIALLY in brick ... etc.

Point 3 does not show where the ONE or TWO ACCESS POINTS (read driveways) will be situated.

All in all, Point 3 fails to provide a plan upon which the basic conditions can be properly judged.

APPX. D7, Point 4.

"Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards' with the minimal gross internal area required and be in the region of between 79 - 102 sq m."

- General Design Principles Policy (LCDPG).

Ref. Schedule of Modifications Page 2, Number 4; 'Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards' with the minimal gross internal area required and be in the region of between 79 – 102 sq m.'

2 storey houses will fail to 'limit adverse impact' upon local amenity. The proposed CFS8 development will be visible from hundreds of metres away across the Curtis Farm fields. Amenity landscape views from Highland Wood and Tankers Table Woods will be adversely affected and AONB amenity compromised.

Current expansive AONB landscape amenity views from Tokers Green Lane at the Village edge will be lost by the CFS8 housing construction.

Local Kidmore End Village residents of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill will all have their amenity comprised if not destroyed by development of CFS8. A row of 'up to four' dwellings build on that part of the village will have a deleterious effect upon LCDPG principles.

The proposed smaller CFS8 dwellings will be out of keeping in size with the surrounding properties and will look totally out of place in that part of the village. Thereby adversely affecting the visual amenity of the southern Kidmore End village aspect.

Development of CFS8 will conflict with a wide range of LCDPG Policy guidance as stated in the Table 1: Conformity of Neighbourhood Plan Policies to National Policy and Advice: 'a range of development management matters from design to climate change, heritage, biodiversity, density, amenity, landscape and light pollution that is in conformity with the relevant sections of the NPPF and NPPG resources.'

NO TOPOGRAPHICAL SURVEY HAS BEEN UNDERTAKEN OR PROVIDED AS EVIDENCE OF TRUE DISTANCE AND TERRAIN.

APPX. D7, Points 5 to 7,

"Pt. 5. Buildings should be sited/ oriented to prevent overlooking of neighbouring properties.

- Despite the absence of architectural plans and without knowing if there will be two, three or four new builds. It is still apparent from the sketched location of the 'Approximate Building Line', that the CFS8 development will overlook the immediate neighbouring properties of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill.

Pt. 6. "The properties are expected to conform to an informal linear or staggered layout which respects the existing building line as shown."

- The sketch plan shows the proposed CFS8 building line DOES NOT respect the existing St. Fillans and Stuanhill building line.

Pt. 7. Gardens should be a minimum of 15m in depth in line with SODC design guide"

IN THE ABSENCE OF PLANS, SITE DRAWINGS AND ARCHITECTURAL LAYOUTS, THE REVISED APPX D7 LACKS EVIDENCE BASED SUBSTANCE.

- Housing Allocation Policy (HDA).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways)

-OCC Oxfordshire County Council Highways Dept. have raised serious ongoing concerns to the increase in traffic which will be created by CFS8 development. The width of Tokers Green Lane at that point is extremely narrow. As part of the Consultation 14, ample evidence of vehicular incursion upon the highway verges has been provided by local Tokers Green Lane householders. Giving evidence on how vehicular traffic has eaten away at property frontages along Tokers Green Lane, in some instances up to one metre of roadside verge has been lost. Which shows the severe strain already existing on Tokers Green Lane prior to the addition of 'up to four' dwellings at the village periphery.

APPX D7 IS WITHOUT SUBSTANCE , PRIOR TO A FULL HIGHWAYS ACCESS AND SAFETY REPORT PROVIDED AS PART OF A CFS8 SUBMISSION.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

WITH NO CLARITY AS TO WHETHER CFS8 WILL BE TWO, THREE OR FOUR DWELLINGS, THE DENSITY DEBATE IS LEFT OPEN TO CONJECTURE.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised.

180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

An alternative site CFS10 has provided a full BNG biodiversity net gain report as part of its submission.

A BIODIVERSITY NET GAIN REPORT SHOULD BE REQUIRED OF THE CFS8 PROPOSED DEVELOPMENT.

APPX. D7, Point 8,

"Bat and bird boxes should be integrated into buildings with hedgehog access provided under any garden fences."

- IN THE ABSENCE OF A PRELIMINARY ECOLOGICAL APPRAISAL (PHASE ONE) OR A BIODIVERSITY NET GAIN REPORT, THERE IS NO EVIDENCE WITHIN APPX. D7 OF OBJECTIVE, MEANINGFUL, ECOLOGICAL OR BIODIVERSITY MITIGATION DATA SUPPORTED INFORMATION.

- Chilterns AONB and its Setting Policy (LPCS).

Ref. NPPF paragraphs 8 (sustainable development), 124-131 (design), 170 and 172 (AONBs and landscape), 127, 180 (amenity etc), 180(d) (dark landscapes), 184-202 (heritage) and 170, 174-177 (biodiversity / Net Gain / green infrastructure). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 31-001-20191101 to 31-007-20191101 (light pollution), 66-006-20190722 to 66-007-20190722 (amenity / daylight), 18a-001-20190723 to 18a063-20190723 and 18a-039-20190723 to 18a-041-20190723 (heritage), 37-004-20140306 (rights of way) and 8-004-20190721 to 8-035-20190721 (biodiversity / Net Gain and green infrastructure)

In their response to the Examiner's Second Clarification note, the Chilterns Conservation Board (CCB) states: "it is useful to point out that the anticipated review of the AONB boundary, following the findings of the Glover Review and the Government's January 2022 response, will potentially review areas such as this." It is therefore presumptive of KENDPSG to allocate CFS8 as their preferred site whilst there is an important AONB boundary review in progress.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

WITH NO CLARITY AS TO WHETHER CFS8 WILL BE TWO, THREE OR FOUR DWELLINGS, THE DENSITY DEBATE IS LEFT OPEN TO CONJECTURE.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised.

180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

An alternative site CFS10 has provided a full BNG biodiversity net gain report as part of its submission.

A BIODIVERSITY NET GAIN REPORT SHOULD BE REQUIRED OF THE CFS8 PROPOSED DEVELOPMENT.

- Preservation of Footpaths, Bridleways and Tracks Policy (LTPFBT).

Ref. NPPF paragraphs 8 (sustainable development), 84 (rural economy), 91 (healthy communities), 102-104 and 108-110 (transport), 127 (design).

NPPG paragraphs 37-004-20140306 (rights of way) and 42-013-20140306 to 42-015-20140306 (transport)

Under 'Comment for Conformity', the following statement is made:

"ensure that development is sustainably located and that proposals for new development protect existing cycle and pedestrian routes and provide enhancement where possible. This is consistent with the approach to the promotion of sustainable modes of transportation as set out in detail in the NPPF and, to a lesser degree, in the NPPG."

However, Tokers Green Lane is very narrow and fails to meet adequate Highways standards. The proposed CFS8 development provides no plans for a pedestrian route from the development into Kidmore End village.

NO ARCHITECTURAL DRAWINGS OR PLANS HAVE BEEN PROVIDED FOR THE CFS8 DEVELOPMENT. IT IS STILL UNKNOWN WHETHER THE FINAL DEVELOPMENT WILL BE TWO, THREE OR FOUR DWELLINGS.

The footpath from the Butlers Orchard / Tokers Green Lane junction to Highland Wood and Tankers Table Woods will be compromised and the amenity views from the footpath will be severely adversely affected by the CFS8 development. The existing rural landscape amenity will be replaced by views of a development of smaller dwelling new builds, together with the concomitant noise and visual amenity degradation.

APPX. D7, Point 9.

"Parking to be accommodated to the front of the dwellings with sufficient on plot parking (including visitor parking) to ensure no parking on the restricted Tokers Green Lane"

APPX. D7. PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. THERE ARE NO PLANS DRAWN OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE GIVEN.

IT IS STILL UNKNOWN HOW MANY 'SMALLER' DWELLINGS ARE TO BE BUILT .. APPENDIX D7 MERELY PREDICTS "UP TO FOUR".

- Safe Access and Parking Policy (LTSAP).

Ref. NPPF paragraphs 8 (sustainable development), 102, 105-111 (traffic / highways); Ministerial statement on Parking 20152

NPPG Paragraphs 42-013-20140306 to 42-015-20140306 (transport).

There is no CFS8 site plan showing the actual dwellings in situ.

Rather APPX. D7. merely provides a rough draft "to illustrate the expected layout, scale, landscaping and access for the site". As such, LTSAP issues are thoroughly vague. With no site plans of where and how many dwellings are to be accommodated on the 0.2 Ha. site, it is impossible to gauge the true access and parking aspects.

APPX. D7. states: "Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planting. The requirement for visibility splays should not lead to an open frontage onto Tokers Green Lane."

CFS8 therefore might have one access, or it might have two access points?

The 'requirement for visibility splays' is mentioned, however in the absence of any sort of Transport Statement or Highways consultant report, there is no evidence to show CFS8 will provide for safe access or adequate parking provision.

APPX D7 PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION.

However, in the absence of CFS8 architectural layouts, plans and/or site drawings, it remains impossible to make informed comments on the actual proposed dwellings and their dimensions and how they lay within their environment.

Q4. If appropriate, you can set out below what change(s) you consider necessary to make the plan able to proceed. It would be helpful if you are able to put forward your suggested revised wording of any text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, please attach these to your response.

CFS8 should not proceed.

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

**Q7. Please state your specific reasons for requesting a public hearing below:**

A consensus of opinion within KE Parish shows dissatisfaction with the way the KENP process was carried out. There have been concerns voiced that the KENDP Steering Group blocked divergent voices from being heard, with closed door meetings being held. A degree of heavy-handedness and on occasion a lack of open two-way communication has been evident. Allegations of Apparent Bias in the KENP site allocation process have been made.

In the Regulation 16 Consultation, sixteen out of the fifty three submissions asked for a public hearing. Of the actual Kidmore End village respondents, the majority provided submissions against the CFS8 site allocation.

The current Appx. D7 provides NO ARCHITECTURAL, HIGHWAYS, BIODIVERSITY, ECOLOGICAL, AMENITY OR ROAD SAFETY EVIDENCE for site CFS8.

**Your details and future contact preferences**

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Eugene Madejski
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	[REDACTED]
<b>Organisation representing (if relevant)</b>	-
[REDACTED]	[REDACTED]
[REDACTED]	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	
[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

# Response 4

## Respondent Details

### Information

[REDACTED]

Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

APPENDIX D7 v1.2, Points 1 to 10, references to corresponding Basic Conditions statements are attached.

APPENDIX D7 introduction:

"This site specific Design Code is supplementary to Policy HDA and allocates the 0.2 hectare site for for up to 4 smaller dwellings. As well as local character and landscape policies, it is intended to illustrate the expected layout, scale, landscaping and access for the site."

- CFS8 is situated on the southern edge of Kidmore End village and its development will be another step in extending the village in the direction of Tokers Green village and coalescence with the greater Caversham/Reading conurbation.
- CFS8 development will add to KEPC settlement coalescence, contrary to the 'basic conditions' statement.

APPX. D7, Point 1.

"Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planning. The requirement for visibility plays should not lead to an open frontage onto Tokers Green Lane."

Under 'Comment for Conformity', the following statement is made:

"The criteria contained in this policy echo the national policy objectives for road safety at paragraphs 102-110 of the NPPF, whilst also referencing good practice in designing for rural locations. Both elements of the policy are in general conformity with national planning policy and guidance."

- However, on the contrary, there are serious omissions and deviances from LTSRU 'good practice' in the CFS8 development, such as:

NPPF paragraphs 8 (sustainable development),  
102, 108-109 (traffic / highways).

- No Transport Statement has been provided in the proposed CFS8 development. This is a serious omission and wholly compromises the scheme, as no traffic / highways safety and/or access analysis has been undertaken.

- There is no traffic / highways safety evidence provided.

NPPF 124-131 (design).

- OCC Highways mapping is unavailable for the Tokers Green Lane southern edge of Kidmore End village.

- Highways access and roadway design for traffic entering and exiting the proposed CFS8 development is absent from the proposal. This is a serious omission

- ENTRANCE / EXIT ROADWAY DESIGN WITH FULL CALCULATION MEASUREMENTS OF SPLAY LINES AND CFS8 VISIBILITY EVIDENCE IS REQUIRED.

- NO TOPOGRAPHICAL SURVEY UNDERTAKEN FOR ACCURATE DISTANCE AND TERRAIN DATA INFORMATION. A FUNDAMENTAL OMISSION.

- NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. NO PLANS DRAWN OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE OF POTENTIAL ACCESS DRIVEWAYS ON/OFF TOKERS GREEN LANE.

In recent years, KEPC has worked hard to adopt aspects of the 'Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268'.

Specifically by Kidmore End village speed limit reduction to 20 m.p.h., development of CFS8 on Tokers Green Lane will countermand

the excellent work by KEPC and create conflict with Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268, as stated:

APPX. D7, Point 2.

"A well-defined defensible boundary must be provided to the west and south of the allocation as shown on Appx. D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement."

- Local Gap Policy (LPLG).

LPLG states: "This policy draws on comprehensive landscape and village character evidence in appendices C, D and E to the Neighbourhood Development Plan to prevent coalescence between Caversham and Tokers Green and to protect a narrow gap of vulnerable open land and rural setting next to the urban area of Reading."

The development of site CFS8 therefore clearly conflicts with the Local Gap Policy. Development of CFS8 would clearly create further coalescence between Kidmore End village and Tokers Green and by association on to Caversham.

THE CFS8 DEVELOPMENT WILL CREATE FURTHER COALESCENCE BETWEEN KIDMORE END VILLAGE AND CAVERSHAM.

APPX. D7, Point 3.

"Appropriate frontage planning could include a double row of beech hedges or other native hedgerow species to help screen the development. This could be combined with a low garden wall potentially in brick and flint to match those found in the area."

The D7 sketched map is not based on any survey or Topographically accurate measurements.

- D7 Point 3 vaguely refers to "... could include"; "... could be combined" etc. The Appx. D7 provides a rough illustration of where hedgerows COULD be planted, where an approximate building line .. COULD be situated. Which COULD be combined with a low garden wall POTENTIALLY in brick ... etc.

Point 3 does not show where the ONE or TWO ACCESS POINTS (read driveways) will be situated.

All in all, Point 3 fails to provide a plan upon which the basic conditions can be properly judged.

APPX. D7, Point 4.

"Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards' with the minimal gross internal area required and be in the region of between 79 - 102 sq m."

- General Design Principles Policy (LCDPG).

2 storey houses will fail to 'limit adverse impact' upon local amenity.

The proposed CFS8 development will be visible from hundreds of metres away across the Curtis Farm fields.

Amenity landscape views from Highland Wood and Tankers Table Woods will be adversely affected and AONB amenity compromised.

Current expansive AONB landscape amenity views from Tokers Green Lane at the Village edge will be lost by the CFS8 housing construction.

Local Kidmore End Village residents of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill will have amenity comprised by CFS8 new builds.

A row of 'up to four' dwellings build on that part of the village will have an adverse effect upon LCDPG principles.

The proposed smaller CFS8 dwellings will be out of keeping in size with the surrounding properties and will look totally out of place in that part of the village. Thereby adversely affecting the visual amenity of the southern Kidmore End village aspect.

CFS8 Development will conflict with a wide range of LCDPG Policy guidance as stated in the Table 1: Conformity of Neighbourhood Plan Policies to National Policy and Advice: 'a range of development management matters from design to climate change, heritage, biodiversity, density, amenity, landscape and light pollution that is in conformity with the relevant sections of the NPPF and NPPG resources.'

NO TOPOGRAPHICAL SURVEY HAS BEEN UNDERTAKEN OR PROVIDED AS EVIDENCE OF TRUE DISTANCE AND TERRAIN.

APPX. D7, Points 5 to 7,

"Pt. 5. Buildings should be sited/ oriented to prevent overlooking of neighbouring properties.

- Despite the absence of architectural plans and without knowing if there will be two, three or four new builds. It is still apparent from the sketched location of the 'Approximate Building Line', that the CFS8 development will overlook the immediate neighbouring properties of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill.

Pt. 6. "The properties are expected to conform to an informal linear or staggered layout which respects the existing building line as shown."

- The sketch plan shows the proposed CFS8 building line DOES NOT respect the existing St. Fillans and Stuanhill building line.

Pt. 7. Gardens should be a minimum of 15m in depth in line with SODC design guide"

IN THE ABSENCE OF PLANS, SITE DRAWINGS AND ARCHITECTURAL LAYOUTS, THE REVISED APPX D7 LACKS EVIDENCE BASED SUBSTANCE.

- Housing Allocation Policy (HDA).

-OCC Oxfordshire County Council Highways Dept. have raised serious ongoing concerns to the increase in traffic which will be created by CFS8 development.

The width of Tokers Green Lane at that point is extremely narrow.

As part of the Consultation 14, ample evidence of vehicular incursion upon the highway verges has been provided by local Tokers Green Lane householders.

Local evidence exists as to how vehicular traffic has eaten away at property frontages along Tokers Green Lane, in some instances up to one metre of roadside verge lost. Proving traffic congestion exists on Tokers Green Lane prior to an addition of 'up to four'

dwelling at the village periphery.

PRIOR TO A FULL HIGHWAYS ACCESS AND SAFETY REPORT PROVIDED AS PART OF A CFS8 SUBMISSION, THERE IS LITTLE SUBSTANTIVE EVIDENCE TO SUPPORT THE CFS8 DEVELOPMENT.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

AS IT IS YET TO BE DECIDED IF CFS8 WILL BE TWO, THREE OR FOUR DWELLINGS, THERE CANNOT AS YET BE A PROPER DENSITY DEBATE.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised. 180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

An alternative site CFS10 has provided a full BNG biodiversity net gain report as part of its submission.

A ECOLOGICAL PHASE ONE AND BIODIVERSITY NET GAIN REPORT ARE REQUIRED EVIDENCE TO PROVE THE SUITABILITY OF THE CFS8 PROPOSED DEVELOPMENT.

APPX. D7, Point 8,

"Bat and bird boxes should be integrated into buildings with hedgehog access provided under any garden fences."

- IN THE ABSENCE OF A PRELIMINARY ECOLOGICAL APPRAISAL (PHASE ONE) OR A BIODIVERSITY NET GAIN REPORT, THERE IS NO EVIDENCE WITHIN APPX. D7 OF OBJECTIVE, MEANINGFUL, ECOLOGICAL OR BIODIVERSITY MITIGATION DATA SUPPORTED INFORMATION.

- Chilterns AONB and its Setting Policy (LPCS).

In their response to the Examiner's Second Clarification note, the Chilterns Conservation Board (CCB) states: "it is useful to point out that the anticipated review of the AONB boundary, following the findings of the Glover Review and the Government's January 2022 response, will potentially review areas such as this." It is therefore presumptive of KENDPSG to allocate CFS8 as their preferred site whilst there is an important AONB boundary review in progress.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised. 180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

- Preservation of Footpaths, Bridleways and Tracks Policy (LTPFBT).

Ref. NPPF paragraphs 8 (sustainable development), 84 (rural economy), 91 (healthy communities), 102-104 and 108-110 (transport), 127 (design).

NPPG paragraphs 37-004-20140306 (rights of way) and 42-013-20140306 to 42-015-20140306 (transport)

Under 'Comment for Conformity', the following statement is made:

"ensure that development is sustainably located and that proposals for new development protect existing cycle and pedestrian routes and provide enhancement where possible. This is consistent with the approach to the promotion of sustainable modes of transportation as set out in detail in the NPPF and, to a lesser degree, in the NPPG."

However, Tokers Green Lane is very narrow and fails to meet adequate Highways standards. The proposed CFS8 development provides no plans for a pedestrian route from the development into Kidmore End village.

NO ARCHITECTURAL PLANS ARE PROVIDED FOR CFS8. IT IS UNKNOWN IF THE FINAL DEVELOPMENT WILL BE TWO, THREE OR FOUR DWELLINGS.

The footpath from the Butlers Orchard / Tokers Green Lane junction to Highland Wood and Tankers Table Woods will be compromised and the amenity views from the footpath will be severely adversely affected by the CFS8 development. The existing rural landscape amenity will be replaced by views of a development of smaller dwelling new builds, together with noise and visual amenity degradation.

APPX. D7, Point 9.

"Parking to be accommodated to the front of the dwellings with sufficient on plot parking (including visitor parking) to ensure no parking on the restricted Tokers Green Lane"

PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. NO PLANS OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE.

UNKNOWN HOW MANY 'SMALLER' DWELLINGS ARE TO BE BUILT. APPX D7 PREDICTS "UP TO FOUR".

- Safe Access and Parking Policy (LTSAP).

Ref. NPPF paragraphs 8 (sustainable development), 102, 105-111 (traffic / highways); Ministerial statement on Parking 20152 NPPG Paragraphs 42-013-20140306 to 42-015-20140306 (transport).

There is no CFS8 site plan showing the actual dwellings in situ.

Rather APPX. D7. merely provides a rough draft "to illustrate the expected layout, scale, landscaping and access for the site". As such, LTSAP issues are thoroughly vague. With no site plans of where and how many dwellings are to be accommodated on the 0.2 Ha. site, it is impossible to gauge the true access and parking aspects.

APPX. D7. states: "Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planting. The requirement for visibility splays should not lead to an open frontage onto Tokers Green Lane."

CFS8 therefore might have one access, or it might have two access points?

The 'requirement for visibility splays' is mentioned, however in the absence of any sort of Transport Statement or Highways consultant report, there is no evidence to show CFS8 will provide for safe access or adequate parking provision.

APPX D7 PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING.

APPX. D7, Point 10.

'Open views across the AONB open fields south of CFS8 to be retained from Butlers Orchard and Tokers Green Lane'. This statement is disingenuous, because in the absence of Site Layout Plans with distance measurements and in the absence of a Site Aerial and Internal Views Plan, it is not possible to gauge the extent to which views from Butlers Orchard and Tokers Green Lane will be compromised.

SUPPORTING EVIDENCE:

- Separation of Settlements Policy (LCSS).

If CFS8 development proceeds, then LCSS policy will be countermanded: 'Neighbourhood Development Plan to identify a series of locations where settlements are vulnerable to coalescence and where it will be important to maintain their separate physical and visual identities.'

NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123 (density), 124-131 (design), 170, 172 (AONBs and landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721

(landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722 (amenity).

APPX. D7, Point 1.

- Safety for All Road Users Policy (LTSRU).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways) 124-131 (design). NPPG Paragraphs 42-013-20140306 to

42-015-20140306 (transport) and 26-001-20191001 to 26-023-20191001 (design).

- Quiet Lanes Policy (LCQL).

Tokers Green Lane identifies as a 'Quiet Lane'. Development of site CFS8 conflicts with NPPF paragraphs 8 170, 172 (AONBs and landscape), 127 and 180 (amenity).

In recent years, KEPC has worked hard to adopt aspects of the 'Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268'.

'(2) The appropriate national authority may make regulations authorising local traffic authorities who have designated roads as quiet lanes or home zones to make use orders and speed orders of such descriptions as are prescribed by the regulations in relation to any roads designated by them as quiet lanes or home zones.'

APPX. D7, Point 2.

- Local Gap Policy (LPLG).

Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123 (density), 124-131 (design), 170, 172 (AONBs and

landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722 (amenity)

APPX. D7, Point 4.

- General Design Principles Policy (LCDPG).

Ref. Schedule of Modifications Page 2, Number 4; 'Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards<sup>1</sup> with the minimal gross internal area required and be in the region of between 79 – 102 sq m.'

APPX. D7, Points 7

- Housing Allocation Policy (HDA).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways)

117-119 (making effective use of land).

122-123 (density).

148-153 (climate change).

170, 172 (AONBs and landscape).

- Chilterns AONB and its Setting Policy (LPCS).

Ref. NPPF paragraphs 8 (sustainable development), 124-131 (design), 170 and 172 (AONBs and landscape), 127, 180 (amenity etc), 180(d) (dark landscapes), 184-202 (heritage) and 170, 174-177 (biodiversity / Net Gain / green infrastructure). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 31-001-20191101 to 31-007-20191101 (light pollution), 66-006-20190722 to 66-007-20190722 (amenity / daylight), 18a-001-20190723 to 18a#063-20190723 and 18a-039-20190723 to 18a-041-20190723 (heritage), 37-004-20140306 (rights of way) and 8-004-20190721 to 8-035-20190721 (biodiversity / Net Gain and green infrastructure)

Q4. If appropriate, you can set out below what change(s) you consider necessary to make the plan able to proceed. It would be helpful if you are able to put forward your suggested revised wording of any text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, please attach these to your response.

The current KENDP plan should not proceed as it is seriously flawed, reports are missing regarding the site's Architectural Layout, Ecology, Biodiversity, Highways, Traffic, Flooding, Drainage, Landscape, Amenity, Topography etc.  
An alternative less sensitive site CFS10, has already been submitted for planning approval, with four dwellings to be designed according to the Chilterns Building Design Guide, with the future owners members of the SODC Custom Build Plot Register 'Kidmore End Self-Custom Build group'.

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

Site CFS8 fails to address many of the necessary NPPF criteria and therefore does not meet Basic Conditions.  
The Appx. D7 has omitted ARCHITECTURAL, HIGHWAYS, BIODIVERSITY, ECOLOGICAL, AMENITY OR ROAD SAFETY EVIDENCE for site CFS8.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

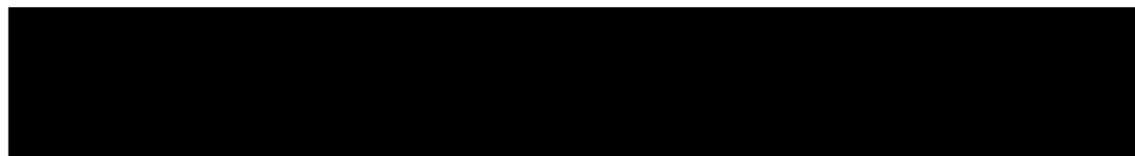
**Title** -  
**Name** Valie Madejska  
**Job title (if relevant)** -  
**Organisation (if relevant)** -  
**Organisation representing (if relevant)** -

██████████	████████████████████
██████████	
██████████	
██████████	██████████
██████████	██████████
██████████████████	
██████████	████████████████████

# Response 5

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

The comments are made with reference to the Basic Conditions statements.

APPENDIX D7 introduction:

"This site specific Design Code is supplementary to Policy HDA and allocates the 0.2 hectare site for for up to 4 smaller dwellings. As well as local character and landscape policies, it is intended to illustrate the expected layout, scale, landscaping and access for the site."

- Separation of Settlements Policy (LCSS).

If CFS8 development proceeds, then LCSS policy will be countermanded: 'Neighbourhood Development Plan to identify a series of locations where settlements are vulnerable to coalescence and where it will be important to maintain their separate physical and visual identities.'

Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123(density), 124-131 (design), 170, 172 (AONBs and landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design),8-036-20190721 to 8-042-20190721

(landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722(amenity).

- CFS8 is situated on the southern edge of Kidmore End village and its development will be another step in extending the village in the direction of Tokers Green village and coalescence with the greater Caversham/Reading conurbation.

- CFS8 development will add to KEPC settlement coalescence, contrary to the 'basic conditions' statement.

APPX. D7, Point 1.

"Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planning. The requirement for visibility splays should not lead to an open frontage onto Tokers Green Lane."

- Safety for All Road Users Policy (LTSRU).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways) 124-131 (design).NPPG Paragraphs 42-013-20140306 to

42-015-20140306 (transport) and 26-001-20191001 to 26-023-20191001 (design).

Under 'Comment for Conformity', the following statement is made:

"The criteria contained in this policy echo the national policy objectives for road safety at paragraphs 102-110 of the NPPF, whilst also referencing good practice in designing for rural locations. Both elements of the policy are in general conformity with national planning policy and guidance."

- However, on the contrary, there are serious omissions and deviances from LTSRU 'good practice' in the CFS8 development, such as:

NPPF paragraphs 8 (sustainable development),

102, 108-109 (traffic / highways).

- No Transport Statement has been provided in the proposed CFS8 development. This is a serious omission and wholly compromises the scheme, as no traffic / highways safety and/or access analysis has been undertaken.

- There is no traffic / highways safety evidence provided.

NPPF 124-131 (design).

- OCC Highways mapping is unavailable for the Tokers Green Lane southern edge of Kidmore End village.

- Highways access and roadway design for traffic entering and exiting the proposed CFS8 development is absent from the proposal.

A serious omission.

- ENTRANCE / EXIT ROADWAY DESIGN WITH FULL CALCULATION MEASUREMENTS OF SPLAYLINES AND CFS8 VISIBILITY EVIDENCE IS REQUIRED.
- NO TOPOGRAPHICAL SURVEY UNDERTAKEN FOR ACCURATE DISTANCE AND TERRAIN DATA INFORMATION. A FUNDAMENTAL OMISSION.
- NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. NO PLANS DRAWN OF THE PROPOSED DWELLINGS, LACKS EVIDENCE OF POTENTIAL ACCESS POINT LOCATIONS.

DRIVEWAYS ON/OFF TOKERS GREEN LANE.

- Quiet Lanes Policy (LCQL).

Tokers Green Lane identifies as a 'Quiet Lane'. Development of site CFS8 conflicts with NPPF paragraphs 8 170, 172 (AONBs and landscape), 127 and 180 (amenity).

In recent years, KEPC has worked hard to adopt aspects of the 'Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268'. Specifically by Kidmore End village speed limit reduction to 20 m.p.h., development of CFS8 on Tokers Green Lane will countermand the excellent work by KEPC and create conflict with Transport Act 2000 -Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268, as stated:

APPX. D7, Point 2.

"A well-defined defensible boundary must be provided to the west and south of the allocation as shown on Appx. D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement."

- Local Gap Policy (LPLG).

Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123(density), 124-131 (design), 170, 172 (AONBs and

landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722 (amenity)

LPLG states: "This policy draws on comprehensive landscape and village character evidence in appendices C, D and E to the Neighbourhood Development Plan to prevent coalescence between Caversham and Tokers Green and to protect a narrow gap of vulnerable open land and rural setting next to the urban area of Reading."

The development of site CFS8 therefore clearly conflicts with the Local Gap Policy. Development of CFS8 would clearly create further coalescence between Kidmore End village and Tokers Green and by association on to Caversham.

THE CFS8 DEVELOPMENT WILL CREATE FURTHER COALESCENCE BETWEEN KIDMORE END VILLAGE AND CAVERSHAM.

APPX. D7, Point 3.

"Appropriate frontage planning could include a double row of beech hedges or other native hedgerow species to help screen the development. This could be combined with a low garden wall potentially in brick and flint to match those found in the area."

The D7 sketched map is not based on any survey or Topographically accurate measurements.

- D7 Point 3 vaguely refers to "... could include"; "... could be combined" etc. The Appx. D7 provides a rough illustration of where hedgerows COULD be planted, where an approximate building line .. COULD be situated. Which COULD be combined with a low garden wall POTENTIALLY in brick ... etc.

Point 3 does not show where the ONE or TWO ACCESS POINTS (read driveways) will be situated.

All in all, Point 3 fails to provide a plan upon which the basic conditions can be properly judged.

APPX. D7, Point 4.

"Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards' with the minimal gross internal area required and be in the region of between 79 - 102 sq m."

- General Design Principles Policy (LCDPG).

Ref. Schedule of Modifications Page 2, Number 4; 'Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards' with the minimal gross internal area required and be in the region of between 79 - 102 sq m.'

Construction of double-storey houses will fail to 'limit adverse impact' upon local amenity. The proposed CFS8 development will be visible from hundreds of metres away across the Curtis Farm fields. Amenity landscape views from Highland Wood and Tankers Table Woods will be adversely affected and AONB amenity compromised.

Current expansive AONB landscape amenity views from Tokers Green Lane at the Village edge will be lost by the CFS8 housing construction.

Local Kidmore End Village residents of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill will all have their amenity severely comprised by development of CFS8. A row of 'up to four' dwellings build on that part of the village will have a deleterious effect upon LCDPG principles.

The proposed smaller CFS8 dwellings will be out of keeping in size with the surrounding properties and will look totally out of place in that part of the village. Thereby adversely affecting the visual amenity of the southern Kidmore End village aspect.

Development of CFS8 will conflict with a wide range of LCDPG Policy guidance as stated in the Table 1: Conformity of Neighbourhood Plan Policies to National Policy and Advice: 'a range of development management matters from design to climate change, heritage, biodiversity, density, amenity, landscape and light pollution that is in conformity with the relevant sections of the NPPF and NPPG resources.'

NO TOPOGRAPHICAL SURVEY HAS BEEN UNDERTAKEN OR PROVIDED AS EVIDENCE OF TRUE DISTANCE AND TERRAIN.

APPX. D7, Points 5 to 7,

"Pt. 5. Buildings should be sited/ oriented to prevent overlooking of neighbouring properties.

- Despite the absence of architectural plans and without knowing if there will be two, three or four newbuilds. It is still apparent from the sketched location of the 'Approximate Building Line', that the CFS8 development will overlook the immediate neighbouring

properties of St. Fillans, Greenwich Cottage, CliveCottage, Arenal and Struanhill.

Pt. 6. "The properties are expected to conform to an informal linear or staggered layout which respects the existing building line as shown."

- The sketch plan shows the proposed CFS8 building line DOES NOT respect the existing St. Fillans and Stuanhill building line.

Pt. 7. Gardens should be a minimum of 15m in depth in line with SODC design guide"

IN THE ABSENCE OF PLANS, SITE DRAWINGS AND ARCHITECTURAL LAYOUTS, THE REVISED APPX D7 LACKS EVIDENCE BASED SUBSTANCE.

- Housing Allocation Policy (HDA).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways)

-OCC Oxfordshire County Council Highways Dept. have raised serious ongoing concerns to the increase in traffic which will be created by CFS8 development. The width of Tokers Green Lane at that point is extremely narrow. As part of the Consultation 14, ample evidence of vehicular incursion upon the highway verges has been provided by local Tokers Green Lane householders. Giving evidence on how vehicular traffic has eaten away at property frontages along Tokers Green Lane, in some instances up to one metre of roadside verge has been lost. Which shows the severe strain already existing on Tokers Green Lane prior to the addition of 'up to four' dwellings at the village periphery.

In the absence of a Transport consultancy full highways safety and access report, the Appx.D7 layout lacks evidence to support its findings.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

THE DENSITY DEBATE IS LEFT OPEN TO CONJECTURE AS THERE'S NO CLARITY AS TO CFS8 BEING TWO, THREE OR FOUR DWELLINGS?

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised.

180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

An alternative site CFS10 has provided a full BNG biodiversity net gain report as part of its submission.

A BIODIVERSITY NET GAIN REPORT SHOULD BE REQUIRED OF THE CFS8 PROPOSED DEVELOPMENT.

APPX. D7, Point 8,

"Bat and bird boxes should be integrated into buildings with hedgehog access provided under any garden fences."

- IN THE ABSENCE OF A PRELIMINARY ECOLOGICAL APPRAISAL (PHASE ONE) OR A BIODIVERSITY NET GAIN REPORT, THERE IS NO EVIDENCE WITHIN APPX. D7 OF OBJECTIVE, MEANINGFUL, ECOLOGICAL OR BIODIVERSITY MITIGATION DATA SUPPORTED INFORMATION.

- Chilterns AONB and its Setting Policy (LPCS).

Ref. NPPF paragraphs 8 (sustainable development), 124-131 (design), 170 and 172 (AONBs and landscape), 127, 180 (amenity etc), 180(d) (dark landscapes), 184-202 (heritage) and 170, 174-177 (biodiversity / Net Gain / green infrastructure). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 31-001-20191101 to 31-007-20191101 (light pollution), 66-006-20190722 to 66-007-20190722 (amenity / daylight), 18a-001-20190723 to 18a-063-20190723 and 18a-039-20190723 to 18a-041-20190723 (heritage), 37-004-20140306 (rights of way) and 8-004-20190721 to 8-035-20190721 (biodiversity / Net Gain and green infrastructure)

In their response to the Examiner's Second Clarification note, the Chilterns Conservation Board (CCB) states: "it is useful to point out that the anticipated review of the AONB boundary, following the findings of the Glover Review and the Government's January 2022 response, will potentially review areas such as this." It is therefore presumptive of KENDPSG to allocate CFS8 as their preferred site whilst there is an important AONB boundary review in progress.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

WITH NO CLARITY AS TO WHETHER CFS8 WILL BE TWO, THREE OR FOUR DWELLINGS, THE DENSITY DEBATE IS LEFT OPEN TO CONJECTURE.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised.

180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

An alternative site CFS10 has provided a full BNG biodiversity net gain report as part of its submission.

A BIODIVERSITY NET GAIN REPORT SHOULD BE REQUIRED OF THE CFS8 PROPOSED DEVELOPMENT.

- Preservation of Footpaths, Bridleways and Tracks Policy (LTPFBT).

Ref. NPPF paragraphs 8 (sustainable development), 84 (rural economy), 91 (healthy communities), 102-104 and 108-110 (transport), 127 (design).

Tokers Green Lane is very narrow and fails to meet adequate Highways standards. The proposed CFS8 development provides no plans for a pedestrian route from the development into Kidmore End village.

NO ARCHITECTURAL DRAWINGS OR PLANS HAVE BEEN PROVIDED FOR THE CFS8 DEVELOPMENT. IT IS STILL UNKNOWN WHETHER THE FINAL DEVELOPMENT WILL BE TWO, THREE OR FOUR DWELLINGS.

The footpath from the Butlers Orchard / Tokers Green Lane junction to Highland Wood and Tankers Table Woods will be compromised and the amenity views from the footpath will be severely adversely affected by the CFS8 development. The existing rural landscape amenity will be replaced by views of a development of smaller dwelling new builds, together with the concomitant noise and visual amenity degradation.

APPX. D7, Point 9.

"Parking to be accommodated to the front of the dwellings with sufficient on plot parking (including visitor parking) to ensure no parking on the restricted Tokers Green Lane"

APPX. D7. PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. THERE ARE NO PLANS DRAWN OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE GIVEN.

IT IS STILL UNKNOWN HOW MANY 'SMALLER' DWELLINGS ARE TO BE BUILT .. APPENDIX D7 MERELY PREDICTS "UP TO FOUR".

- Safe Access and Parking Policy (LTSAP).

Ref. NPPF paragraphs 8 (sustainable development), 102, 105-111 (traffic / highways); Ministerial statement on Parking 20152 NPPG Paragraphs 42-013-20140306 to 42-015-20140306 (transport).

There is no CFS8 site plan showing the actual dwellings in situ.

Rather APPX. D7. merely provides a rough draft "to illustrate the expected layout, scale, landscaping and access for the site". As such, LTSAP issues are thoroughly vague. With no site plans of where and how many dwellings are to be accommodated on the 0.2 Ha. site, it is impossible to gauge the true access and parking aspects.

APPX. D7. states: "Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planting. The requirement for visibility splays should not lead to an open frontage onto Tokers Green Lane."

CFS8 therefore might have one access, or it might have two access points?

The 'requirement for visibility splays' is mentioned, however in the absence of any sort of Transport Statement or Highways consultant report, there is no evidence to show CFS8 will provide for safe access or adequate parking provision.

APPX D7 PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION.

in the absence of CFS8 architectural layouts, plans and/or site drawings, it remains impossible to make informed comments on the actual proposed two to four dwellings, or their dimensions and how they will lie in the locale itself.

Q4. If appropriate, you can set out below what change(s) you consider necessary to make the plan able to proceed. It would be helpful if you are able to put forward your suggested revised wording of any text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, please attach these to your response.

The CFS8 D7 plan should not proceed.

The Appendix D7 plan, despite the additional 'Schedule of Modifications', remains intrinsically flawed.

There is no site plan of the actual houses in situ and no indication on a plan as to the physical shape of the houses to be built.

As the CFS8 part of Tokers Green Lane is affected by flooding, access points are an important part of the project to help decide whether it should proceed, yet the one or two access driveways are not indicated on the D7 plan.

The absence of any consultancy reports pertaining to ecology, biodiversity, highways, flooding, landscape and amenity, topography means the impact of the CFS8 development cannot be gauged.

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination



# Response 6

## Respondent Details

Information


Q1. Are you completing this form as an:
Organisation

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Robyn Tobutt
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	South Oxfordshire District Council
<b>Organisation representing (if relevant)</b>	South Oxfordshire District Council
<b>Address line 1</b>	135 Eastern Avenue
<b>Address line 2</b>	Milton Park
<b>Address line 3</b>	-
<b>Postal town</b>	Abingdon
<b>Postcode</b>	OX14 4SB
<b>Telephone number</b>	-
<b>Email address</b>	robyn.tobutt@southandvale.gov.uk

## **Policy and Programmes**

HEAD OF SERVICE: HARRY BARRINGTON-  
MOUNTFORD



Listening Learning Leading

**Contact Officer: Robyn Tobutt**  
Robyn.Tobutt@southoxon.gov.uk  
Tel: 01235 422600

24 March 2022

### **Kidmore End Parish Neighbourhood Development Plan: Consultation on the revised Appendix D7 – Housing Allocation**

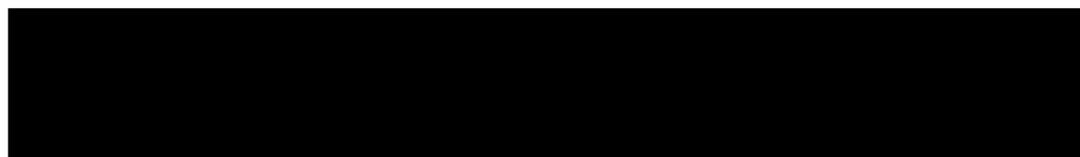
The council supports the revisions proposed to Appendix D7 – Housing Allocation (CFS8 Design Code). The Parish Council proposed these revisions in response to the examiner's second clarification note. The council considers that the proposed modifications refine the proposed allocation and enhances the quality of the scheme.

Robyn Tobutt  
**Senior Planning Policy Officer (Neighbourhood)**

# Response 7

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

The Appendix D7 and Schedule of Modifications is light on detail and in the absence of reports providing objective supporting evidence and/or data its conclusions remain unsubstantiated. Professional consultant's reports are absent, these would help local community members and the general public to review potential benefits and challenges of the CFS8 development. For now, much of the AppxD7 plan is left to mere conjecture and guesswork.

- Separation of Settlements Policy (LCSS).

If CFS8 development proceeds, then LCSS policy will be contradicted: 'Neighbourhood Development Plan to identify a series of locations where settlements are vulnerable to coalescence and where it will be important to maintain their separate physical and visual identities.'

Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123(density), 124-131 (design), 170, 172 (AONBs and landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design),8-036-20190721 to 8-042-20190721

(landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722(amenity).

- CFS8 is situated on the southern edge of Kidmore End village and its development will be another step in extending the village in the direction of Tokers Green village and coalescence with the Caversham/Reading conurbation.

- CFS8 development will add to KEPC settlement coalescence, contrary to the 'basic conditions' statement.

APPX. D7, Point 1.

OXFORDSHIRE C.C. RECOMMENDATION HOLDING RESERVATION: 'Advice from Highways, Oxfordshire County Council Appx. B3: Housing Requirement and Allocation Paper Update, January 2020 page 34'.

OCC Highways outline their serious numerous concerns re. allocation of site CFS8:

"CFS 8 – Provision of five dwellings – Recommendation Holding Objection, further information would be required:

Please see the comments below;

1. No details supplied with regards to vehicular access, however, frontage will require improvements so as to provided access arrangement to standards
2. A speed survey will be required so as to ascertain the appropriate level of visibility splay required
3. Gradient issues
4. No footway opportunities within vicinity, not lit, proposal is considered unsustainable in terms of transport
5. Improvements to existing passing opportunities required, passing opportunity within the vicinity of site to be provided
6. Turning area will need to be provided and vehicular tracking demonstrating a servicing and emergency vehicle can turn within the site and egress in a forward gear
7. Access geometry to standards, tracking for vehicles accessing and egressing the proposal will need to be demonstrated for consideration – likely to require a 4.8m wide access
8. Drainage issues within vicinity of site – carriageway flooded."

UNTIL CFS8 DEVELOPERS ADDRESS THE EIGHT OCC HIGHWAYS OBJECTIONS, SITE CFS8 FROM A ROAD SAFETY PERSPECTIVE REMAINS INVALID.

- Safety for All Road Users Policy (LTSRU).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways) 124-131 (design). NPPG Paragraphs 42-013-20140306 to

42-015-20140306 (transport) and 26-001-20191001 to 26-023-20191001 (design).

here are serious omissions and deviances from LTSRU 'good practice' in the CFS8 development, such as: NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways).

- No Transport Statement has been provided in the proposed CFS8 development. This is a serious omission and compromises the scheme, as no traffic / highways safety and/or access analysis has been undertaken.

- There is no traffic / highways safety evidence provided.

NPPF 124-131 (design).

- OCC Highways mapping is unavailable for the Tokers Green Lane southern edge of Kidmore End village.

- Highways access and roadway design for traffic entering and exiting the proposed CFS8 development is absent from the proposal. A serious omission.

- ENTRANCE / EXIT ROADWAY DESIGN WITH FULL CALCULATION MEASUREMENTS OF SPLAYLINES AND CFS8 VISIBILITY EVIDENCE IS REQUIRED.

- NO TOPOGRAPHICAL SURVEY UNDERTAKEN FOR ACCURATE DISTANCE AND TERRAIN DATA INFORMATION. A FUNDAMENTAL OMISSION.

- NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. NO PLANS DRAWN OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE OF POTENTIAL ACCESS

DRIVEWAYS ON/OFF TOKERS GREEN LANE.

- Quiet Lanes Policy (LCQL).

Tokers Green Lane identifies as a 'Quiet Lane'. Development of site CFS8 conflicts with NPPF paragraphs 8 170, 172 (AONBs and landscape), 127 and 180 (amenity).

In recent years, KEPC has worked hard to adopt aspects of the 'Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268'. Ref. Kidmore End village speed limit reduction to 20 m.p.h., development of CFS8 on Tokers Green Lane will countermand the excellent work by KEPC and create conflict with Transport Act 2000 - Chapter 38 Quiet lanes and home zones and rural road speed limits Section 268.

APPX. D7, Point 2.

"A well-defined defensible boundary must be provided to the west and south of the allocation as shown on Appx. D7 with a minimum width of 3m native

hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to

soften the edge of the settlement."

- Local Gap Policy (LPLG).

Ref. NPPF paragraphs 8 (sustainable development), 117-119 (making effective use of land), 122-123 (density), 124-131 (design), 170, 172 (AONBs and

landscape), 127 and 180 (amenity). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 66-004-20190722 to 66-005-20190722 (density), 66-006-20190722 to 66-007-20190722 (amenity)

LPLG states: "This policy draws on comprehensive landscape and village character evidence in appendices C, D and E to the Neighbourhood Development Plan to prevent coalescence between Caversham and Tokers Green and to protect a narrow gap of vulnerable open land and rural setting next to the urban area of Reading."

The development of site CFS8 therefore clearly conflicts with the Local Gap Policy. Development of CFS8 would clearly create further coalescence between Kidmore End village and Tokers Green and by association on to Caversham.

THE CFS8 DEVELOPMENT WILL CREATE FURTHER COALESCENCE BETWEEN KIDMORE END VILLAGE AND CAVERSHAM.

APPX. D7, Point 3.

The D7 plan has not been prepared with survey or Topographically accurate measurements, there is no scale provided.

- D7 Point 3 vaguely refers to "... could include"; "... could be combined" etc. The Appx. D7 provides a rough illustration of where hedgerows COULD be planted, where an approximate building line .. COULD be situated. Which COULD be combined with a low garden wall POTENTIALLY in brick ... etc.

Point 3 does not show where the ONE or TWO ACCESS POINTS (read driveways) will be situated. Point 3 fails to provide a plan upon which the basic conditions can be properly judged.

APPX. D7, Point 4.

- General Design Principles Policy (LCDPG).

Ref. Schedule of Modifications Page 2, Number 4; 'Building heights should be limited to 2 storeys to limit adverse impact. Building footprints should reflect typical local patterns for smaller dwellings and be no more than 2 to 3 bedrooms. These should meet the Technical Housing Standards 1 with the minimal gross internal area required and be in the region of between 79 – 102 sq m.' 2 storey houses will fail to 'limit adverse impact' upon local amenity. The proposed CFS8 development will be visible from hundreds of metres away across the Curtis Farm fields.

Amenity landscape views from Highland Wood and Tankers Table Woods will be adversely affected and AONB amenity compromised.

Current expansive AONB landscape amenity views from Tokers Green Lane at the Village edge will be lost by the CFS8 housing construction.

Local Kidmore End Village residents of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill will all have their amenity comprised if not destroyed by development of CFS8. A row of 'up to four' dwellings build on that part of the village will have a deleterious effect upon LCDPG principles.

The proposed smaller CFS8 dwellings will be out of keeping in size with the surrounding properties and look out of place in that part of the village. Thereby adversely affecting the visual amenity of the southern Kidmore End village aspect.

Development of CFS8 will conflict with a wide range of LCDPG Policy guidance as stated in the Table 1: Conformity of Neighbourhood Plan Policies to National Policy and Advice: 'a range of development management matters from design to climate change, heritage, biodiversity, density, amenity, landscape and light pollution that is in conformity with the relevant sections of the NPPF and NPPG resources.'

NO TOPOGRAPHICAL SURVEY HAS BEEN UNDERTAKEN OR PROVIDED AS EVIDENCE OF TRUE DISTANCE AND TERRAIN.

APPX. D7, Points 5 to 7,

"Pt. 5. Buildings should be sited/ oriented to prevent overlooking of neighbouring properties.

- In the absence of any measurements and/or scale to the Appx D7 plan. Whilst the four dwellings are absent from the plan, it remains impossible to properly consider the ramifications and the extent to which neighbouring properties will be overlooked. However, despite the absence of architectural plans and without confirmation if there will be two, three or four newbuilds, it is still apparent from the sketched location of the 'Approximate Building Line', the CFS8 development will overlook the immediate neighbouring properties of St. Fillans, Greenwich Cottage, Clive Cottage, Arenal and Struanhill.

Point. 6. "The properties are expected to conform to an informal linear or staggered layout which respects the existing building line as shown."

- The sketch plan shows the proposed CFS8 building line DOES NOT respect the existing St. Fillans and Stuanhill building line.

Point. 7. Gardens should be a minimum of 15m in depth in line with SODC design guide"

IN THE ABSENCE OF PLANS, SITE DRAWINGS AND ARCHITECTURAL LAYOUTS, THE REVISED APPX D7 LACKS EVIDENCE BASED SUBSTANCE.

- Housing Allocation Policy (HDA).

Ref. NPPF paragraphs 8 (sustainable development), 102, 108-109 (traffic / highways)

-OCC Oxfordshire County Council Highways Dept. have raised serious ongoing concerns to the increase in traffic which will be created by CFS8 development. The width of Tokers Green Lane at that point is extremely narrow. As part of the Consultation 14, ample evidence of vehicular incursion upon the highway verges has been provided by local Tokers Green Lane householders. Giving evidence on how vehicular traffic has eaten away at property frontages along Tokers Green Lane, in some instances up to one metre of roadside verge has been lost. Which shows the severe strain already existing on Tokers Green Lane prior to the addition of 'up to four' dwellings at the village periphery.

IN THE ABSENCE OF A HIGHWAYS ACCESS SAFETY REPORT CFS8 AND THE APPX.D7 LACKS OBJECTIVE ROAD SAFETY EVIDENCE.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

WITH NO CLARITY WHETHER CFS8 WILL BE TWO, THREE OR FOUR DWELLINGS, ON-THE-GROUND DENSITY IS LEFT TO CONJECTURE.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised. 180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

A BIODIVERSITY NET GAIN REPORT SHOULD BE REQUIRED OF THE CFS8 PROPOSED DEVELOPMENT.

APPX. D7, Point 8,

"Bat and bird boxes should be integrated into buildings with hedgehog access provided under any garden fences."

- IN THE ABSENCE OF A PRELIMINARY ECOLOGICAL APPRAISAL (PHASE ONE) OR A BIODIVERSITY NET GAIN REPORT, THERE IS NO APPX.D7 EVIDENCE OF OBJECTIVE AND MEANINGFUL, ECOLOGICAL OR BIODIVERSITY MITIGATION DATA.

- Chilterns AONB and its Setting Policy (LPCS).

Ref. NPPF paragraphs 8 (sustainable development), 124-131 (design), 170 and 172 (AONBs and landscape), 127, 180 (amenity etc), 180(d) (dark landscapes), 184-202 (heritage) and 170, 174-177 (biodiversity / Net Gain / green infrastructure). NPPG Paragraphs 26-001-20191001 to 26-023-20191001 (design), 8-036-20190721 to 8-042-20190721 (landscape), 31-001-20191101 to 31-007-20191101 (light pollution), 66-006-20190722 to 66-007-20190722 (amenity / daylight), 18a-001-20190723 to 18a-063-20190723 and 18a-039-20190723 to 18a-041-20190723 (heritage), 37-004-20140306 (rights of way) and 8-004-20190721 to 8-035-20190721 (biodiversity / Net Gain and green infrastructure)

In their response to the Examiner's Second Clarification note, the Chilterns Conservation Board (CCB) states: "it is useful to point out that the anticipated review of the AONB boundary, following the findings of the Glover Review and the Government's January 2022 response, will potentially review areas such as this." It is therefore presumptive of KENDPSG to allocate CFS8 as their preferred site whilst there is an important AONB boundary review in progress.

117-119 (making effective use of land). The CFS8 land is currently rich productive agricultural and will be permanently lost to food production by the proposed development.

122-123 (density). The density of "up to four" CFS8 smaller dwellings will create a housing density in the southern edge of Kidmore End Village which is totally out of kilter with that of the surrounding housing along Tokers Green Lane and Butlers Orchard.

148-153 (climate change). The destruction of productive agricultural land will fail to help climate change initiatives.

170, 172 (AONBs and landscape). The current site of the proposed CFS8 development is a rural landscape typical of Chilterns AONB agricultural land, development of CFS8 will adversely affect the AONB and surrounding landscape for several hundred metres to the north-west, due west and south-west of Kidmore End village.

127, 180 (amenity etc). Visual amenity across open fields stretching hundreds of metres into Highland Woods will be compromised. 180(d) (dark landscapes). Two or three new dwellings will emit light into the night sky, this will adversely affect the dark landscape which currently exists across the Curtis Farm fields stretching hundreds of metres into Highland Woods.

170, 174-177 (biodiversity / Net Gain / green infrastructure). No BNG analysis has been carried out to show the real costs of CFS8 development to the biodiversity and green infrastructure.

- Preservation of Footpaths, Bridleways and Tracks Policy (LTPFBT).

Ref. NPPF paragraphs 8 (sustainable development), 84 (rural economy), 91 (healthy communities), 102-104 and 108-110 (transport), 127 (design).

Tokers Green Lane is very narrow and fails to meet adequate Highways standards. The proposed CFS8 development provides no plans for a pedestrian route from the development into Kidmore End village.

NO ARCHITECTURAL DRAWINGS OR PLANS HAVE BEEN PROVIDED FOR THE CFS8 DEVELOPMENT. IT IS STILL UNKNOWN WHETHER THE FINAL DEVELOPMENT WILL BE TWO, THREE OR FOUR DWELLINGS.

The footpath from the Butlers Orchard / Tokers Green Lane junction to Highland Wood and Tankers Table Woods will be compromised and the amenity views from the footpath will be severely adversely affected by the CFS8 development. The existing rural landscape amenity will be replaced by views of a development of smaller dwelling new builds, together with the concomitant noise and visual amenity degradation.

Point 9.

"Parking to be accommodated to the front of the dwellings with sufficient on plot parking (including visitor parking) to ensure no parking on the restricted Tokers Green Lane"

APPX. D7. PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION. THERE ARE NO PLANS DRAWN OF THE PROPOSED DWELLINGS, NO ON-THE-GROUND EVIDENCE GIVEN.

IT IS STILL UNKNOWN HOW MANY 'SMALLER' DWELLINGS ARE TO BE BUILT .. APPENDIX D7 PREDICTS "UP TO FOUR".

Four dwellings or even three dwellings will be a very tight fit onto a 0.2 hectare site area.

Three or four dwellings squeezed together will be totally at odds with the surrounding existing housing stock. The nearby houses are detached and substantial in size, varying from three to six bedroomed homes.

CFS8 with its far smaller two or three bed dwellings, will be a development totally out of kilter with the surrounding Tokers Green Lane community.

IN ACCORDANCE WITH O.C.C. PLANNING REGULATIONS A TOTAL OF TEN PARKING SPACES WILL BE REQUIRED .

Parking for four dwellings will require eight parking spaces according to the highways requirements of planning application requirements, i.e. two per dwelling. EIGHT PARKING SPACES will be very difficult to accommodate on a 0.2 hectare site.

In addition, planning application requirements insist on an extra TWO VISITOR PARKING spaces.

- Safe Access and Parking Policy (LTSAP).

Ref. NPPF paragraphs 8 (sustainable development), 102, 105-111 (traffic / highways); Ministerial statement on Parking 20152 NPPG Paragraphs 42-013-20140306 to 42-015-20140306 (transport). There is no CFS8 site plan showing the actual dwellings in situ.

APPX. D7. merely provides a rough-draft plan "to illustrate the expected layout, scale, landscaping and access for the site". As such, LTSAP issues are remain vague. With no site plans of where and how many dwellings are to be accommodated on the 0.2 Ha. site, it is impossible to gauge the true access and parking outcomes.

"Access will be taken from Tokers Green Lane via one or two (maximum) access points contained by hedgerow planting. The requirement for visibility splays should not lead to an open frontage onto Tokers Green Lane." CFS8 might therefore have one access, or it might have two access points?

The 'requirement for visibility splays' is mentioned, however in the absence of any sort of Transport Statement or Highways consultant report, there is no evidence to show CFS8 will provide for safe access or adequate parking provision.

APPX D7 PROVIDES NO EVIDENCE OF SAFE ACCESS OR ADEQUATE PARKING PROVISION.

It is very likely the Tokers Green Lane road way will need substantial improvement to accommodate the required ten parking spaces, also to raise the roadway so as to avoid the known flooding risk. The road width will need widening, which has also yet to be addressed in Appx D7.

Point 10. "Open views across the AONB open fields south of CFS8 to be retained from Butlers Orchard and Tokers Green Lane".

Unfortunately, the developers have not instructed LVIA Landscape and Visual Amenity consultants to produce the necessary detailed report, which would address whether existing open views across the AONB will in fact be retained, compromised or lost. This is a serious omission.

Finally, in the continued absence of CFS8 architectural layouts, plans and/or site drawings, it remains impossible to make informed comments on the actual proposed dwellings, their dimensions in the AONB.

Q4. If appropriate, you can set out below what change(s) you consider necessary to make the plan able to proceed. It would be helpful if you are able to put forward your suggested revised wording of any text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, please attach these to your response.

For the plan to get closer to where it is able to proceed, the following consultant reports are necessary to ensure the current site CFS8 assumptions are scientifically proven/supported.  
An onus is on the developers to provide truly objective data, informing the Kidmore End community and general public to the benefits of building on the pristine CFS8 agricultural open AONB landscape.

The following consultant reports need to be provided (listed in alpha order):

1. Arboricultural & Planning Integration Report.
2. Biodiversity Net Gain (BNG) assessment with appropriate Defra Metric habitat definitions assigned.
3. Landscape and Visual Impact Assessment report.
4. Planning Design & Access Statement.
5. Preliminary Ecological Appraisal (comprising an Extended Phase 1 Habitat and Protected Species Scoping Survey).
6. Proposed Site Aerial & Internal Site Views.
7. Topographical survey.
8. Transport Statement.
9. Tree Protection Plan.

The information and results of these consultancy reports will need to be considered as part of the public hearing.

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

- It is apparent the Kidmore End Neighbourhood Plan has been a fraught process. The chosen 'preferred' CFS8 site, has attracted considerable opposition from many local residents and the wider community. Because of this discontent many people have already at Reg. 14 requested a public hearing.
- In the rush, within months of the KENP Sept. 2018 launch to give CFS8 a RAG Green rating, less environmentally sensitive sites have been sidelined.
- Quality of life for those householders near and around the CFS8 site will be seriously compromised by the development.
- Cramming up to four houses on the 0.2 hectare CFS8 site, will be at odds with the surrounding housing stock. The Appx D7 plan envisages each of the four CFS8 dwellings being similar in size to neighbouring St. Fillan's garage! From a rural planning perspective this is unacceptable.
- Eight significant Oxfordshire County Council highways objections to CFS8 access, road and safety aspects have yet to be resolved.
- A public hearing will provide an opportunity to question motives of the KENDP steering committee as to why they have been adamant to solely add their voice to promote CFS8.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

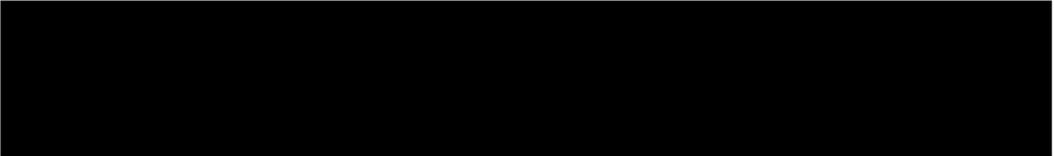
<b>Title</b>	-
<b>Name</b>	Alex Twibill
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	-
<b>Organisation representing (if relevant)</b>	█
█	█
█	█
█	█
█	█
█	█
█	█
█	█
█	█

█

█

# Response 8

## Respondent Details

Information


Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>Response received via email below from SSE:</p> <p>'Thank you for your message below, together with the link to the above NP web-site, regarding the above topic.</p> <p>I can confirm that, at this present time, I have no comments to make.'</p>

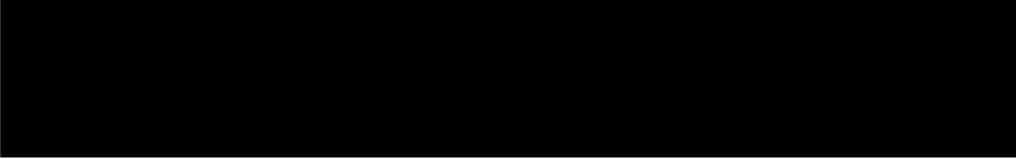
## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Chris Gaskell
<b>Job title (if relevant)</b>	Network Connections Planning Engineer
<b>Organisation (if relevant)</b>	Scottish and Southern Electricity Networks
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	1 Woodstock Road
<b>Address line 2</b>	Yarnton
<b>Address line 3</b>	-
<b>Postal town</b>	Kidlington
<b>Postcode</b>	OX5 1NY
<b>Telephone number</b>	-
<b>Email address</b>	chris.gaskell@sse.com

# Response 9

## Respondent Details

Information


Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>Response received via email from ONR. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 2022-03-16 ONR.pdf - </li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Vicki Enston
<b>Job title (if relevant)</b>	Land Use Planning
<b>Organisation (if relevant)</b>	Office for Nuclear Regulation
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Building 4, Redgrave Court
<b>Address line 2</b>	Merton Road
<b>Address line 3</b>	-
<b>Postal town</b>	Bootle
<b>Postcode</b>	L20 7HS
<b>Telephone number</b>	-
<b>Email address</b>	ONR-Land.Use-planning@onr.gov.uk

---

**From:** ONR Land Use Planning <ONR-Land.Use-Planning@onr.gov.uk>  
**Sent:** 16 March 2022 12:35  
**To:** Planning Policy S&V  
**Subject:** ONR Land Use Planning - Application Kidmore End Neighbourhood Plan

---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam,

Thank you for your email.

Please note that ONR's land use planning processes published at <http://www.onr.org.uk/land-use-planning.htm> **may** apply to some of the developments within the Kidmore End Neighbourhood Plan.

If you are a Local Authority or neighbourhood with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require:

- confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- that the developments do not pose an external hazard to the site.

Kind regards,

Vicki Enston  
Land Use Planning  
Office for Nuclear Regulation  
[ONR-Land.Use-planning@onr.gov.uk](mailto:ONR-Land.Use-planning@onr.gov.uk)

# Response 10

## Respondent Details

Information


Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>Response received via email below from Natural England:</p> <p>'Thank you for getting in touch about the above consultation, please find Natural England's response below.</p> <p>Natural England has no comment on this neighbourhood plan revised appendix. As we mentioned in our previous response, the housing allocation CFS8 is within the Chilterns AONB, and we would advise that you also consult the Chilterns Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution in the plan making process.'</p>

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Isabella Jack
<b>Job title (if relevant)</b>	Sustainable Development Lead Adviser
<b>Organisation (if relevant)</b>	Natural England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Foss House
<b>Address line 2</b>	Kings Pool
<b>Address line 3</b>	1-2 Peasholme Green
<b>Postal town</b>	York
<b>Postcode</b>	YO1 7PX
<b>Telephone number</b>	-
<b>Email address</b>	isabella.jack@naturalengland.org.uk

# Response 11

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Contact Details
<b>Name</b> Mr Mcaslan
[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments





## CFS8 SITE LAYOUT & DIMENSIONS



## Summary of width & areas in Tokers Green Lane

Width of garden at building line (m)	Area of house & back garden (ha)
--------------------------------------	----------------------------------

### Tokers Green Lane (West)

Church View	31.0	1.13
Old Pastures	31.5	1.56
Duffield	29.0	1.47
Maytree Cottage	46.5	2.43
Highfields	20.0	1.10
Lygrove	26.0	0.85
Curtis Farm	33.0	1.50
Strathfillan	32.0	0.85
St Fillans	32.5	1.35
<b>Average Tokers Green Lane (West)</b>	<b>31.3</b>	<b>1.36</b>

### Tokers Green Lane (East)

The Post House	22.5	0.50
The Rectory	14.8	0.45
Bramley	14.0	0.53
Oak Tree House	11.4	0.57
Curtis House	23.9	1.10
Kerenni	21.7	1.20
Willow House	25.7	1.50
Greenwich Cottage	18.2	0.42
Vyne House	17.1	0.52
Clive Cottage	11.5	0.25
Arenal	29.0	0.78
Straunhill	31.0	1.24
<b>Average Tokers Green Lane (East)</b>	<b>20.1</b>	<b>0.76</b>

<b>Average Tokers Green Lane (West &amp; East)</b>	<b>24.9</b>	<b>1.01</b>
--	-------------	-------------

<b>CFS8 site</b>	<b>32.0</b>	<b>1.30</b>
Per dwelling (if 3 properties)	10.7	0.43
Per dwelling (if 4 properties)	8.0	0.33

# Response 12

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: 2022-0~1.PDF - [redacted]
- File: CFS8SI~1.PDF - [redacted]
- File: SUMMAR~1.PDF - [redacted]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

Please see email attachment.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

**Title** -  
**Name** Alastair McAslan OBE  
**Job title (if relevant)** -  
**Organisation (if relevant)** -  
**Organisation representing (if relevant)** -

██████████	██████████
██████████	██████████████████
██████████	██████████
██████████	
██████████	██████████
██████████████████	██████████
██████████	██████████████████

**From:** Alastair McAslan [REDACTED]  
**Sent:** 20 March 2022 13:25  
**To:** Planning Policy S&V  
**Subject:** Consultation on Kidmore End NDP  
**Attachments:** CFS8 site layout.pdf; Summary of width & areas in Tokers Green Lane.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam,

**Re: Consultation on revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan**

Thank you for your email of 3 March 2022 inviting me to comment on the revised Appendix D7 of the Kidmore End Neighbourhood Development Plan (NDP).

I note the revised Appendix D7 alters the shape of the CFS8 site from a rectangle to an (almost) triangle which now includes "... a well-defined defensible boundary .... provided to the west and south of the allocation as shown on D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement." [Extract from the notes at Appendix D7.]

I welcome the reduced frontage of the site and triangular shape which now provides an open view of the field from Butlers Orchard and the field gate on Tokers Green Lane. The proposed minimum 3m deep boundary on the south and west of the site would indeed be consistent with a typical village boundary of Kidmore End village.

My main concern with the proposed change is the lack of space in the site for 3-4 houses of 2-3 bedrooms. I have redrawn the plan on an Ordnance Survey map taken from an SODC website; see attached CFS8 site layout document. The notes in Appendix D7 state that the houses should be positioned behind the building line as shown on the site plan. With a 3m hedgerow around the perimeter of the site, the amount of land available for 3-4 houses and gardens would be reduced to just 1.3ha of the total 2.0ha site. If three houses were built this would allow 0.42ha per house and back garden, each with a frontage of 10.7m. If four houses were built this would allow just 0.33ha per house with a frontage of just 8.0m. I assume that the area in front of the building line will be used for access, parking, septic tanks and perhaps small front gardens.

I have prepared a summary of the dimensions of houses and gardens, and the width of gardens at the building line for all the properties on Tokers Green Lane within Kidmore End; see attached. As you can see, the average width of a garden at the building line on the west side of Tokers Green Lane is 31.3m and the average area of the houses and back gardens is 1.36ha. On the east side of Tokers Green Lane, the averages are 20.1m and 0.76ha.

	Width of garden at building line (m)	Area of house and back garden (ha)
Tokers Green Lane (West) - average	31.3	1.36
Tokers Green Lane (East) - average	20.1	0.76
Tokers Green lane (West & East) - average	24.9	1.01
CFS8 site - total	32.0	1.30
CFS8 site - each house (3 houses)	10.7	0.43

CFS8 site – each house (4 houses)	8.0	0.33
-----------------------------------	-----	------

In summary, the width of each garden on the proposed CFS8 site would be just 43% of the average width of existing gardens in Tokers Green Lane if three houses are built, and just 32% if four houses are built. Indeed, the total area of land available for 3-4 houses on the site is less than for each of the single properties of St Fillans, or Strathfillan, or Curtis Farm – the first three properties neighbouring the CFS8 site. The proposed development of 3-4 houses would therefore be very different in both scale and layout to the existing houses on Tokers Green Lane. Such incompatibility is inconsistent with the requirements of Policy HDA in the Kidmore End NDP.

Your letter states that I may request the need for a public hearing. In my earlier comments on the Regulation 16 draft I emphasised the unwillingness of the Kidmore End Parish and its NDP Steering Group to engage with residents most impacted by the proposed development. A public hearing would provide residents with the opportunity to highlight a number of serious failings in the way the NDP has been developed and decisions taken, not least the absence of an objectively assessed need for more houses within the Parish and the decision to offer land for development on productive agricultural land within the Chilterns Area of Outstanding Natural Beauty. A public hearing would add rigour to the process of open public engagement – something that has not been provided so far by the Parish Council and its NDP Steering Group.

*P.S. I tried to send this as an online comment via the link provided in your email of 3 March, however the link stated that I had already provided comments. Presumably this was referring to earlier comments I made as part of the Regulation 16 consultations and not the subsequent consultation on the revised Appendix D7. Others may have experienced a similar problem submitting online comments.*

Kind regards,

Alastair McAslan OBE



This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

## CFS8 SITE LAYOUT & DIMENSIONS



## Summary of width & areas in Tokers Green Lane

Width of garden at building line (m)	Area of house & back garden (ha)
--------------------------------------	----------------------------------

### Tokers Green Lane (West)

Church View	31.0	1.13
Old Pastures	31.5	1.56
Duffield	29.0	1.47
Maytree Cottage	46.5	2.43
Highfields	20.0	1.10
Lygrove	26.0	0.85
Curtis Farm	33.0	1.50
Strathfillan	32.0	0.85
St Fillans	32.5	1.35
<b>Average Tokers Green Lane (West)</b>	<b>31.3</b>	<b>1.36</b>

### Tokers Green Lane (East)

The Post House	22.5	0.50
The Rectory	14.8	0.45
Bramley	14.0	0.53
Oak Tree House	11.4	0.57
Curtis House	23.9	1.10
Kerenni	21.7	1.20
Willow House	25.7	1.50
Greenwich Cottage	18.2	0.42
Vyne House	17.1	0.52
Clive Cottage	11.5	0.25
Arenal	29.0	0.78
Straunhill	31.0	1.24
<b>Average Tokers Green Lane (East)</b>	<b>20.1</b>	<b>0.76</b>

<b>Average Tokers Green Lane (West &amp; East)</b>	<b>24.9</b>	<b>1.01</b>
--	-------------	-------------

<b>CFS8 site</b>	<b>32.0</b>	<b>1.30</b>
Per dwelling (if 3 properties)	10.7	0.43
Per dwelling (if 4 properties)	8.0	0.33

# Response 13

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: 2022-0~1.PDF - [redacted]
- File: CFS8SI~1.PDF - [redacted]
- File: SUMMAR~1.PDF - [redacted]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

Please see email attachment.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

**Title** -  
**Name** Caroline McAslan  
**Job title (if relevant)** -  
**Organisation (if relevant)** -  
**Organisation representing (if relevant)** -

██████████	██████████
██████████	██████████████████
██████████	██████████
██████████	
██████████	██████████
██████████████████	
██████████	██████████████████████████████

## Whiteley, Rosalynn

---

**From:** Caroline McAslan [REDACTED]  
**Sent:** 20 March 2022 14:03  
**To:** Planning Policy S&V  
**Subject:** RE: Your comments are invited on revised Appendix D7 – Housing Allocation of the Kidmore End Neighbourhood Plan  
**Attachments:** CFS8 site layout.pdf; Summary of width & areas in Tokers Green Lane.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Ms Whiteley,

Thank you for inviting me to comment on the revised Appendix D7 – Housing Allocation of the Kidmore End Neighbourhood Plan.

I have reviewed all the documents and links attached and would like to comment further.

I see that the shape of the CFS8 site has been changed from a rectangle to a triangular shape including some features to soften the boundary and allow for a minimum width of 3 m native hedgerow and shrub planting to reflect the typical village boundary treatment, as well as adding a number of trees.

This change is welcome but the proposed alteration in the site plan now entails a very real lack of space in the site for 3-4 houses containing 2- 3 bedrooms. I attach a plan showing these changes drawing on an Ordnance Survey Map taken from an SODC website. If, as is suggested in Appendix D7, the houses should be positioned behind the building line as shown on the site plan, it is clear that the amount of land available for 3-4 houses and gardens would be significantly reduced. I also assume that the area in front of the building line would be used for access, parking, septic tanks and miniscule front garden plots.

If the revised CFS8 site is compared with the dimensions and width of houses and gardens at the building line for all the properties in Tokers Green Lane, there would be a severe discrepancy in both scale and layout to existing houses on Tokers Green Lane. Indeed, the total area of land available for 3-4 houses on the proposed site is less than for each of the single neighbouring properties of St Fillans, Strathfillan & Curtis Farm. This kind of glaring incompatibility is not consistent with the requirements of Policy HDA in the Kidmore End NDP. (I attach a summary of the dimensions that relate to this inconsistency).

I request the need for a public hearing to air these important matters, something which was previously denied during COVID. There has been a distinct and persistent unwillingness of the Kidmore End Parish Council and its NDP Steering Group to engage with those most affected by the proposed development. Having a public hearing would allow residents to outline the serious number of failings in the way the NDP has been developed and its decisions. In particular, I would highlight the lack of any objectively assessed need for more houses within the Parish and the decision to offer land for development on productive agricultural land within the Chilterns Area of Outstanding Natural Beauty.

I also request to be notified of any decision to formally adopt this neighbourhood plan.

Kind regards,

Caroline McAslan

Please confirm receipt of this message.

## CFS8 SITE LAYOUT & DIMENSIONS



## Summary of width & areas in Tokers Green Lane

Width of garden at building line (m)	Area of house & back garden (ha)
--------------------------------------	----------------------------------

### Tokers Green Lane (West)

Church View	31.0	1.13
Old Pastures	31.5	1.56
Duffield	29.0	1.47
Maytree Cottage	46.5	2.43
Highfields	20.0	1.10
Lygrove	26.0	0.85
Curtis Farm	33.0	1.50
Strathfillan	32.0	0.85
St Fillans	32.5	1.35
<b>Average Tokers Green Lane (West)</b>	<b>31.3</b>	<b>1.36</b>

### Tokers Green Lane (East)

The Post House	22.5	0.50
The Rectory	14.8	0.45
Bramley	14.0	0.53
Oak Tree House	11.4	0.57
Curtis House	23.9	1.10
Kerenni	21.7	1.20
Willow House	25.7	1.50
Greenwich Cottage	18.2	0.42
Vyne House	17.1	0.52
Clive Cottage	11.5	0.25
Arenal	29.0	0.78
Straunhill	31.0	1.24
<b>Average Tokers Green Lane (East)</b>	<b>20.1</b>	<b>0.76</b>

<b>Average Tokers Green Lane (West &amp; East)</b>	<b>24.9</b>	<b>1.01</b>
--	-------------	-------------

<b>CFS8 site</b>	<b>32.0</b>	<b>1.30</b>
Per dwelling (if 3 properties)	10.7	0.43
Per dwelling (if 4 properties)	8.0	0.33

# Response 14

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.
---

Response received via email from Historic England. Please see attachment.
---

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 2022-0~4.PDF - [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Charlotte Cartwright
<b>Job title (if relevant)</b>	Business Officer
<b>Organisation (if relevant)</b>	Historic England
<b>Organisation representing (if relevant)</b>	Historic England
<b>Address line 1</b>	Canon Bridge House
<b>Address line 2</b>	25 Dowgate Hill
<b>Address line 3</b>	-
<b>Postal town</b>	London
<b>Postcode</b>	EC4R 2YA
<b>Telephone number</b>	-
<b>Email address</b>	e-seast@historicengland.org.uk

## Whiteley, Rosalynn

---

**From:** South East ePlanning <e-seast@HistoricEngland.org.uk>  
**Sent:** 21 March 2022 11:16  
**To:** Planning Policy S&V  
**Subject:** RE: Your comments are invited on revised Appendix D7 – Housing Allocation of the Kidmore End Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**\*\*EXTERNAL\*\***

Our ref:PL00753762  
Your ref:  
Main: 020 7973 3700  
[e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)

Date: 21/03/2022

Dear Ms Whiteley,

**RE:** Consultation on revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan

Thank you for inviting Historic England to comment on the above neighbourhood plan. On the basis of the information currently available, we do not wish to offer any detailed comments at this stage.

We would refer you to our general advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer. We may wish to make specific comments on proposals later in the planning process.

Yours faithfully

**Charlotte Cartwright**

Business Officer

---

# Response 15

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: COMMEN~1.PDF - [REDACTED]
- File: APPEND~1.PDF - [REDACTED]

## Your details and future contact preferences



## Comments on Revised **Appendix D7-Housing Allocation of The Kidmore End Neighbourhood Plan.**

### **Appendix 1 Planning Officers Report Application ref P17/S0947/O plus plan**

### **Appendix 2 Planning Officers Report Application ref P16/S1371/O plus plan**

We have also considered in our response to the examiner the “Schedule of modifications” and “Response of Kidmore End Parish Council” to second clarification note.

#### **Housing Allocation Appendix D7**

The Parish Council (PC) in proposing site CFS8 listed 10 design guidelines in support of the development of this site. The PC reviewed these 10 points after the second clarification by the examiner. 6 of these remain unchanged.

The 4 points that were modified and highlighted in the Schedule of Modifications are examined below.

#### **Section: Page 2 number 2**

The first change (numbered 2) relates to the boundary treatment, due to the existing site being part of an open field with extensive views with no existing discernible boundaries and located within the AONB. They have changed the wording so that any new boundary hedging will be a minimum of 3m deep.

At this point I would like to reference two sites that were refused permission. The first for 3 houses (Appendix 1 planning application officers report extract P17/S0947/O) on 0.1ha in the AONB and within the village conversation area. The site formed part of an open field and the comments made by the planning officer in the officer’s report under the heading **“Impact on the character of the area and the Chilterns AONB”** in para 6.21 (Appendix 1) the officer states;

**“It is accepted that suitable landscaping could be used to soften the development or indeed obscure it from view. However, officers do not consider it reasonable to artificially bolster the boundaries with vegetation just to ensure the development is not visible from its wider surroundings. It would in the officer’s view, be a contrived way of ensuring the development is hidden”**

We consider that the proposed screening for this site can be viewed in similar way. The screening would also not prevent the houses or any additional paraphernalia being glimpsed through the vegetation which would take several years to mature.

In para 6.18 the officer states that the development of 3 houses would;

**“Result in the permanent loss of open and rural land which surrounds the village”**

The land proposed under Housing Allocation D7 is open and rural with a strong hedgerow boundary to Tokers Green Lane.

The second site (Appendix 2 planning application officers report extract P16/S1371/O) proposed a single dwelling on 0.2ha of land in the neighbouring village of Gallowstree Common. Subject to similar AONB policies the officers considered the site unsuitable and refused the application.

In the officers report under the heading on page 2 **“Principle of the Development”** the officer refers to the impact of the dwelling on the AONB. It is worth mentioning that at the time of the planning application, SODC did not have a 5 year housing land supply. In para 6.8 the officer refers to the lack of the 5y HLS and states;

**“As the site is located within the AONB great weight must be given to the conservation of the AONB and in this regard I do not consider the lack of a 5 year housing land supply provides sufficient weight to override the impact on the AONB, particularly given that the addition of a single dwelling would have a limited impact on a temporary deficit housing supply, compared with the permanent harm that would be caused to the Chilterns AONB”**

No such deficit now exists, so the allocation of site CFS8 within the AONB whilst alternative sites outside of the AONB exist is difficult to justify, considering past comments and decisions made by SODC officers.

The application was refused and the reason for refusal stated;

**“The application site comprises an area of undeveloped land forming part of a larger agricultural field within the Chilterns AONB”** It goes on to say **“The proposal would detract from the undeveloped rural character and appearance of the site and its surroundings and would fail to conserve the landscape setting of Gallowstree Common or the landscape qualities of the AONB”**

This reason for refusal just strengthens the case of how protected the AONB is in the Parish by SODC officers. It must follow that any development proposed on this housing allocation site is not acceptable.

The changes made under point 2 fail to alter the impact of any proposed development on the Chilterns AONB. This is even more highlighted in the NPPF para 176 in that it fails to neither conserve or enhance the AONB. The changes proposed to the landscaping fail to conserve the character of Tokers Green Lane (TGL). The photograph below shows the existing hedgerow at the front of the site. This will need to be removed to achieve the necessary visibility splays required for the points of access. TGL at this point is only wide enough for one car with no pavements.



We challenge the statement made in point 1 that the access points “**should**” not lead to an open frontage. No site survey or splays have been plotted to prove this.

**Section: Page 2 number 4**

The second modification changes point 4 by adding minimum sizes but does not fix the mix of units e.g., by stating 3no 3 Bedroom houses and 1no 2 bedroom dwelling. It simply says the houses should comprise of 2 or 3 bedroom dwellings but not the number of each.

Within the Neighbourhood Plan supporting documents Appendix D1-6 for each area it contains a density and plot sizes assessment. This is particularly useful in comparing the character of the villages. In a direct comparison between Kidmore End and Tokers Green, 9 individual areas were considered in each village.

In Kidmore End out of the 9 areas calculated, the highest density being 14 dph. 2 areas are 10 dph with the remaining areas between 4 and 9dph.

Compare this to Tokers Green where out of the 9 areas, where 4 areas had a density greater than 20 dph with the highest being 23 dph. The remaining areas were 3-16 dph.

What this shows is that any allocation of 4 small dwellings at a density of 20 dph is much more suited to Tokers Green character than Kidmore Ends character. The development of 4 dwellings at site CSF8 would be out of character with the surrounding area.

**Section: Page 2 number 6**

The third modification under point 6 now adds the option of staggering the houses although the line on the plan shown is straight.

**Section: Page 2 number 10 plus image**

The fourth modification refers to views and it is worth noting that contained within the Neighbourhood Plan supporting documents, **Appendix D1-6 Visual and Spatial Character** under D1.

Kidmore End important **view 7** has now been “relocated” further south on the **modified Housing Allocation D7 document**.

This is of course because of the impact the development would have on the views identified within the Visual and Spatial Character Document. The Neighbourhood Plan should be consistent and as shown in our previous representations fails to maintain consistency through its policies. These important view positions should not be moved as justification of allocating CSF8. The views from view 7 as shown in the Visual and Spatial Character would include (because of the angle of sight) the proposed development. The image below shows site CFS8 from opposite Butlers Orchard and emphasises the openness of the field with the existing strong boundary treatment along the rear gardens of houses fronting TGL and the dense hedgerow fronting TGL. The contribution the site makes to the character of the area and of the special qualities of the AONB.



The modifications proposed still fail to justify the land as a site which is appropriate for the location for 4 houses in the Chiltern AONB when other opportunities exist outside of the AONB.

SODC carried out a review of the South Oxfordshire Landscape character assessment in 2017. On page 178 under the heading Amenity Landscape they identify the key characteristics, because in the south of the district a number of golf courses are located in the Chiltern Hills and near Caversham.

The four key characteristics are;

Typical golf course landscapes of greens, fairways, roughs and bunkers, with associated buildings and parking.

Intensively managed and somewhat sub urban character.

Use of exotic tree species out of character with locality.

Rural, often well wooded-setting with moderate to low intervisibility.

The reason we refer to this, is that site 1017 backs onto a golf course which reflects the above characteristics of the landscape which has a managed and sub urban character and therefore has far less impact on the surrounding wider landscape character of the area outside of the AONB than site CSF8.

### **Comments on Response of Kidmore End Parish Council to the Examiners 2<sup>nd</sup> clarification note.**

#### **Policy LCLG**

The PC state that the same pressures apply when they don't. The Local plan is now adopted and the policies carry greater weight. The revised NPPF increased the protection of areas such as AONB together with the NP which when adopted will provide the necessary level of protection. What is evident in their response is they still incorrectly put greater weight on this policy than the AONB. A development of 4 houses in TGL on the boundary with Caversham would maintain the gap as confirmed by the planning inspector for a much larger scheme of 14 dwellings.

#### **Policy HDA**

The Parish Council put great weight on the Aecom site assessment work which unfortunately in the case of site 1017 only considered the site as a whole and based their findings on a much larger scheme. They should have considered the site in all contexts not just as a large site.

The PC therefore discounted a site which could provide a more suitable location for 4 dwellings outside of the AONB and less impact on the wider landscape. It would be more in character to the surrounding densities as evidenced above.

They state that the allocation has been informed by the findings of the household survey. Whilst the mix and size of the proposed houses have been, the actual allocation of site CSF 8 was not. In fact many objected to the allocation and nearly half of the respondents said houses should go in other villages. The site is not an infill site "within the village" it is an edge of village site located in the AONB.

#### **Major Development**

The PC state that it does not consider this allocation as major development in the AONB.

As a comparable, the adjoining Parish of Woodcote examined "**what constitutes Major Development in the AONB**". When undertaking their NP. An extract from this document is shown below.

### **4 Assessing the Potential Impact**

The conclusion from the above legal opinion and appeal decisions is that 'major development' cannot be determined by scale alone but requires an assessment rooted in the local context. To provide this context the Woodcote Neighbourhood Plan considers the factors listed below to identify 'major development':

#### **4.3 Location**

The location of the development relative to the built-up area is critical in assessing whether an application is major. If the site is enclosed within the built area, it is unlikely to have a significant impact on the AONB. A development that extends the boundary of a settlement (such as backland development) is more likely to have an impact on the AONB. Between these extremes, development

that fills a gap in the built frontage but does not extend beyond the rear of the curtilages of adjacent properties is less likely to have an impact on the AONB unless it is a large development.

#### 4.4 Visibility

The visibility of a development in the AONB, particularly from public rights of way, suggests that the development has a potential impact on the AONB. Similarly, if views from the settlement into the AONB would be affected, this would also imply that there is a potential impact on the AONB. Note that mitigation measures to hide the view into a development may resolve the visibility issue but do not change the fact that landscape in the AONB has been lost.

#### 4.5 Landscape character

If the landscape in the immediate vicinity of the settlement is typical of the landscape character in the AONB then even small developments will potentially have a significant impact on the AONB causing loss of typical landscape character.

What this shows is a detailed assessment of what constitutes major development and it is not simply scale but the local context of the proposed development and its impact on the AONB that should also form part of that judgement. We consider that Kidmore End PC have not fully justified the reasoning for allocating the site in the AONB whilst areas outside of the AONB are available within the parish that could accommodate small scale development. The allocation of site CFS 8 is against policy ENV1 of the adopted South Oxfordshire Local Plan.

### Conclusions

The amendments made under Appendix D-7 fail to justify the inclusion of site CSF8 in the KENP. The PC has sort by simply changing the shape and depth of planting along the south and west boundary that this development would not damage the AONB.

Evidence has been provided that shows other sites in SODC and indeed in the Parish that small scale housing was not permitted due to the impact on the AONB.

The PC have failed to provide evidence that the introduction of points of access would not create an open frontage. The existing vegetation along TGL is on the edge of the highway. Vision splays and radii would require most of the hedge to be removed.

The PC have stated that the household survey supports this site. That might be true that the survey showed a need for smaller dwellings but it did not fully support the location.

Whilst many Parishes in South Oxfordshire are completely washed over with AONB or Green Belt policies and do not have a choice on where to allocate sites, KEPC has land outside of these highly protected areas and therefore should consider land in the least sensitive areas first.

The site chosen is in a low density housing area with properties fronting TGL in large plots and having individual driveways. The form of layout would be out of character with the prevailing pattern of development.

Site (part of) 1017 is the logical location for a small development, outside of the AONB backing onto a golf course. The density of Tokers Green is higher than Kidmore End and the pattern of development in the form of cul-de-sacs would be maintained. The access would utilise the existing field gate.

Ecology, tree, landscaping and ground surveys have all been found to show that the site is suitable for development without any adverse impacts. Tokers Green Lane is wider at this point than outside site CSF8.

The main reason we see that the PC are against choosing this site is Aecom discounted it. This was because the site was dismissed at appeal for 14 and 20 dwellings. Previously the site was considered suitable. They also consider it would be against policy LCLG despite the Planning Inspector stating that the gap would be maintained even on a much larger scheme.

We therefore respectfully ask the examiner to consider the inclusion of (part of) site 1017 within the Kidmore End Neighbourhood Plan for the development of 4 small dwellings.

Mike Waller

Director

Perfectfield Limited

**APPENDIX 1**

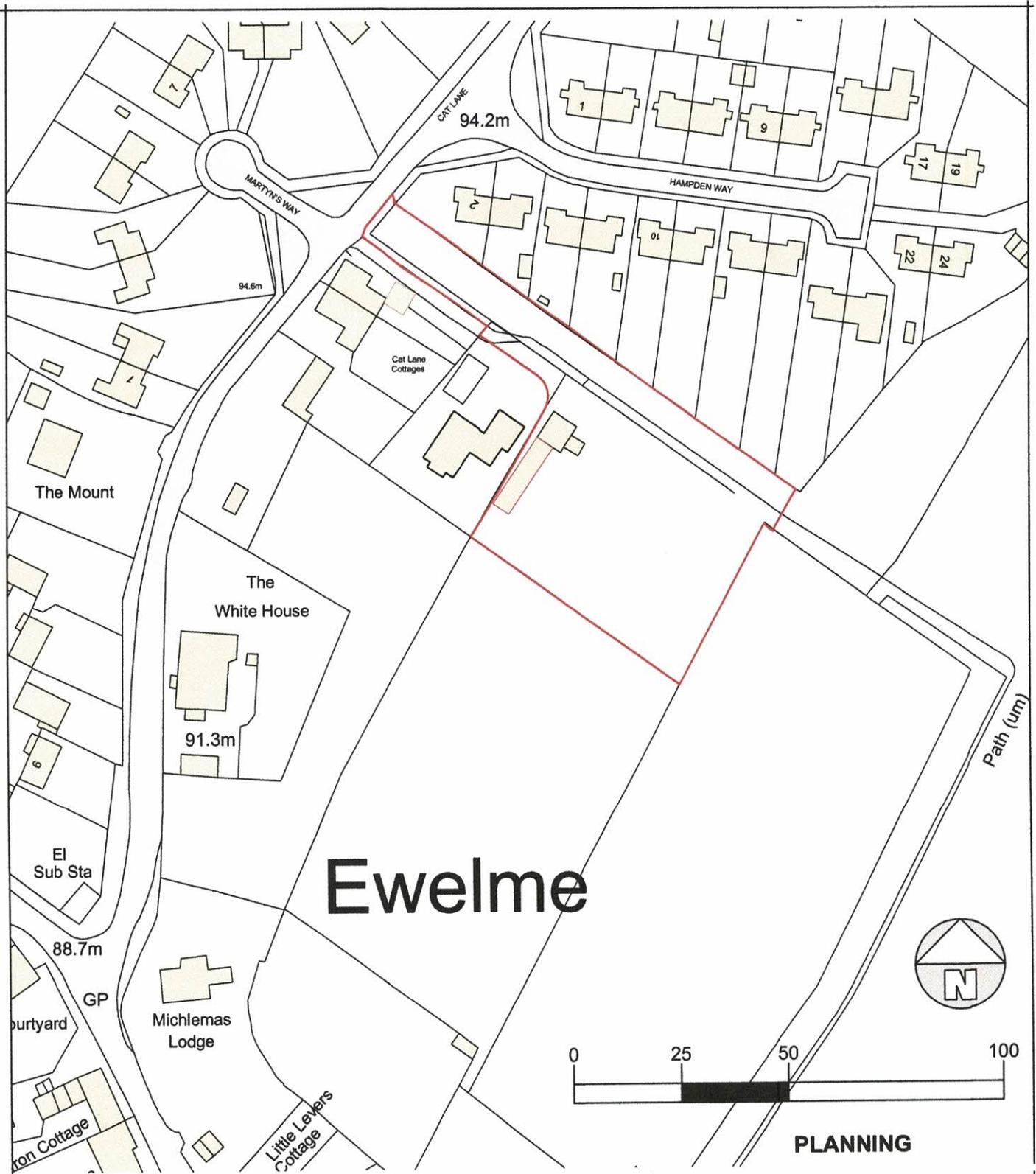
**South Oxfordshire District Council – Delegated Report**

however it is appreciated that the proposed dwellings could be appropriately designed and finished to respect the character and appearance of local built form.

- 6.18 The proposed development would introduce three dwellings, in addition to the previously approved single detached dwelling (app P16/S1639/FUL), along this unmade track. The site is currently open and, whilst partially occupied with unattractive derelict agricultural buildings, does display a rural character. The development would, in officer's view, urbanise the site with the introduction of an extended access and three new buildings and associated residential paraphernalia. The dwellings would result in a linear form of development along this track, which would consolidate backland development, which would, in officer's view, be contrary to the linear pattern of built form along Cat Lane. It is officers view therefore that this development does not respect or positively respond to the character and appearance of local built form and instead would adversely urbanise the land and result in harm to the rural character of the village. As such the development would be contrary to policies CSQ3 of the SOCS and G2, H4 and D1 of the SOLP.
- 6.19 Paragraph 115 of the NPPF seeks to ensure that great weight should be given to conserving landscape and scenic beauty in AONB, which have the highest status of protection in relation to landscape and scenic beauty. Officers consider that the loss of hedgerows and vegetation between the public footpath and Hampden Way in order to provide a new access would result in a negative visual impact along Cat Lane to the detriment of the rural setting and character of this part of the Chilterns AONB. In addition the development of three dwellings here would result in the permanent loss of open and rural land which surrounds the village.
- 6.20 Policies C4 and G4 of the SOLP are relevant to the proposed development. These both seek to ensure that any attractive landscape settings of settlements are not harmed by development and that the countryside is protected for its own sake. Officers consider that further development of this land would greatly harm the rural character and landscape setting of this part of the village, to the detriment of the Chilterns AONB. This land provides an open buffer between the built form of Ewelme and its surrounding farmland and the addition of three dwellings and their associated parking and accesses would urbanise this area and degrade the rural character that informs the built form of this village.
- 6.21 Further to this, officers consider that the development would be visible from the wider Chilterns AONB, especially in the winter months when viewed from the PROW leading eastward out of the village. It is accepted that suitable landscaping could be used to soften the development or indeed obscure it from view. However officers do not consider it reasonable to artificially bolster the boundaries with vegetation just to ensure that the development is not visible from its wider surroundings. It would, in officer's view, be a contrived way of ensuring the development was hidden.
- 6.22 Officers therefore consider that the development would fail to accord with paragraph 115 of the NPPF, policy CSEN1 of the SOCS and policies C4 and G4 of the SOLP.

**Impact on the amenities of neighbours**

- 6.23 The Council's policies and guidance seeks to ensure that new dwellings are considerate to neighbours by way of ensuring that the development does not intrude upon a neighbour's privacy, does not overshadow, obstruct daylight or have an oppressive or overbearing impact, which would be harmful to the amenity of occupiers living in neighbouring properties. Policy H4 (iv) seeks to ensure that new residential development does not amount to any overriding amenity harm.



<b>PROJECT</b> LAND ADJACENT TO CAT LANE EWELME OX10 6HX	Rev.	Date.	Description.	Scale	Date	Drawn	
				1:1250@A4	Feb 17	SW	
				Job No. <b>1636</b>	Drawing No. <b>100</b>		

<b>DRAWING TITLE</b> LOCATION PLAN	Marlborough House High Street Kidlington Oxford OX5 2DN		 <b>PARTNERSHIP</b> Architects
	t 01865 842922	f 01865 841004	
	design@col-hicks.co.uk		

## APPENDIX 2

**South Oxfordshire District Council – Delegated Report**

**5.0 POLICY & GUIDANCE**

- 5.1 South Oxfordshire Core Strategy policies  
 CS1 - Presumption in favour of sustainable development  
 CSEN1 - Landscape protection  
 CSQ3 - Design  
 CSR1 - Housing in villages  
 CSS1 - The Overall Strategy
- 5.2 South Oxfordshire Local Plan 2011 policies;  
 C4 - Landscape setting of settlements  
 C6 - Maintain & enhance biodiversity  
 C8 - Adverse affect on protected species  
 C9 - Loss of landscape features  
 D1 - Principles of good design  
 D2 - Safe and secure parking for vehicles and cycles  
 D3 - Outdoor amenity area  
 D4 - Reasonable level of privacy for occupiers  
 D6 - Community safety  
 D10 - Waste Management  
 EP8 - Contaminated land  
 G2 - Protect district from adverse development  
 G4 - Protection of Countryside  
 H18 - Change use of agricultural land to residential land  
 H4 - Housing sites in towns and larger villages outside Green Belt  
 T1 - Safe, convenient and adequate highway network for all users  
 T2 - Unloading, turning and parking for all highway users

South Oxfordshire Design Guide 2008

**5.3 National Planning Policy Framework**

National Planning Policy Framework Planning Practice Guidance

**6.0 PLANNING CONSIDERATIONS**

- 6.1 The main issues in relation to the assessment of this proposal are:
1. The principle of the development
  2. The impact on the character and appearance of the site and surrounding area
  3. The impact on neighbouring amenity
  4. Highway safety
  5. Other material considerations

The Principle of the Development

- 6.2 Under Appendix 4 of the SOCS Gallowstree Common is listed as a smaller village. Within such settlements Policy CSR1 of the SOCS allows for infill development on sites up to 0.2ha. 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' (Para.13.10 of the SOCS).
- 6.3 The application site is approximately 0.2ha in area, however, in my view the site does not meet the definition of infill development. The site forms part of an undeveloped greenfield gap of over 80 metres between Hearn's Lane and Woodside Lane and

## South Oxfordshire District Council – Delegated Report

cannot be regarded as a small gap in a built up frontage to Horsepond Road. Also due to the large plot sizes of adjacent dwellings and the distances between the site and neighbouring buildings of any substantial size, the proposed dwelling would not be closely surrounded by existing buildings.

- 6.4 The council cannot currently demonstrate a 5 year housing land supply. In these circumstances I acknowledge that Paragraph 49 of the NPPF states that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing land and the 'presumption in favour of sustainable development' should be applied. Policy CSR1 clearly relates to housing supply and is not up to date.
- 6.5 Paragraph 14 of the NPPF advises that there is a presumption in favour of sustainable development. For decision-taking this means "approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted."
- 6.6 Footnote 9 of Page 4 of the NPPF introduces the specific policies in the NPPF that indicate development should be restricted. Amongst these are policies relating to an Area of Outstanding Natural Beauty. Consequently, Paragraph 14 of the NPPF is not engaged for applications in AONBs. Instead these should be assessed against Paragraphs 115 and 116 of the NPPF.
- 6.7 Paragraph 115 of the NPPF confirms that "great weight" should be given to conserving and enhancing the landscape and scenic beauty of the AONBs "which have the highest status of protection". This reinforces the statutory duty placed on the Council under Section 85 of the Countryside Rights of Way Act 2000 and means that SOCS Policy CSEN1 and the SOLP 2011 Policy C4 continue to have full weight.
- 6.8 As the site is located within the AONB great weight must be given to the conservation of the AONB and in this regard I do not consider that the lack of a 5 year housing land supply provides sufficient weight to override the impact on the AONB, particularly given that the addition of a single dwelling, would have a limited impact on the temporary deficit in housing supply, compared with the permanent harm that would be caused to the Chilterns AONB.

### The Impact on the Character and Appearance of the Site and Surrounding Area

- 6.9 The site is part of an undeveloped area of land totalling approximately 0.5ha on the eastern edge of the village. The openness of the land along with the surrounding vegetation makes a positive impact on the landscape setting of the settlement. Policy C4 of the SOLP states that, 'development which would damage the attractive landscape setting of the settlements of the district will not be permitted,' whilst Policy CSEN1 of the SOCS states that, 'the district's distinct landscape character and key features will be protected against inappropriate development and where possible enhanced,' and that high priority will be given to conservation and enhancement of the Areas of Outstanding Natural Beauty (AONBs)'.
- 6.10 The proposed development of the site for one dwelling along with associated access, parking and garden areas would diminish the rural and undeveloped character and

appearance of the site, and by doing so would adversely affect the landscape setting of the village when approaching from the east as the development would be evident from the public highway. The development would undermine the contribution the site and the larger parcel of land with which it is associated makes to the landscape qualities of this part of the AONB, and as such would fail to comply with the above policies.

#### The Impact on Neighbouring Amenity

- 6.11 Although the site adjoins existing residential plots, the dwelling could be sited far enough away from neighbouring dwellings and garden areas to ensure that there would be no detrimental impact on neighbouring amenity.

#### Highway Safety

- 6.12 Although access is a reserved matter, an amended indicative plan has been submitted in response to the Highway Authority's initial concerns. This demonstrates that sufficient visibility could be achieved at the access. The Highway Authority has raised no objections to the proposal on highway safety grounds.

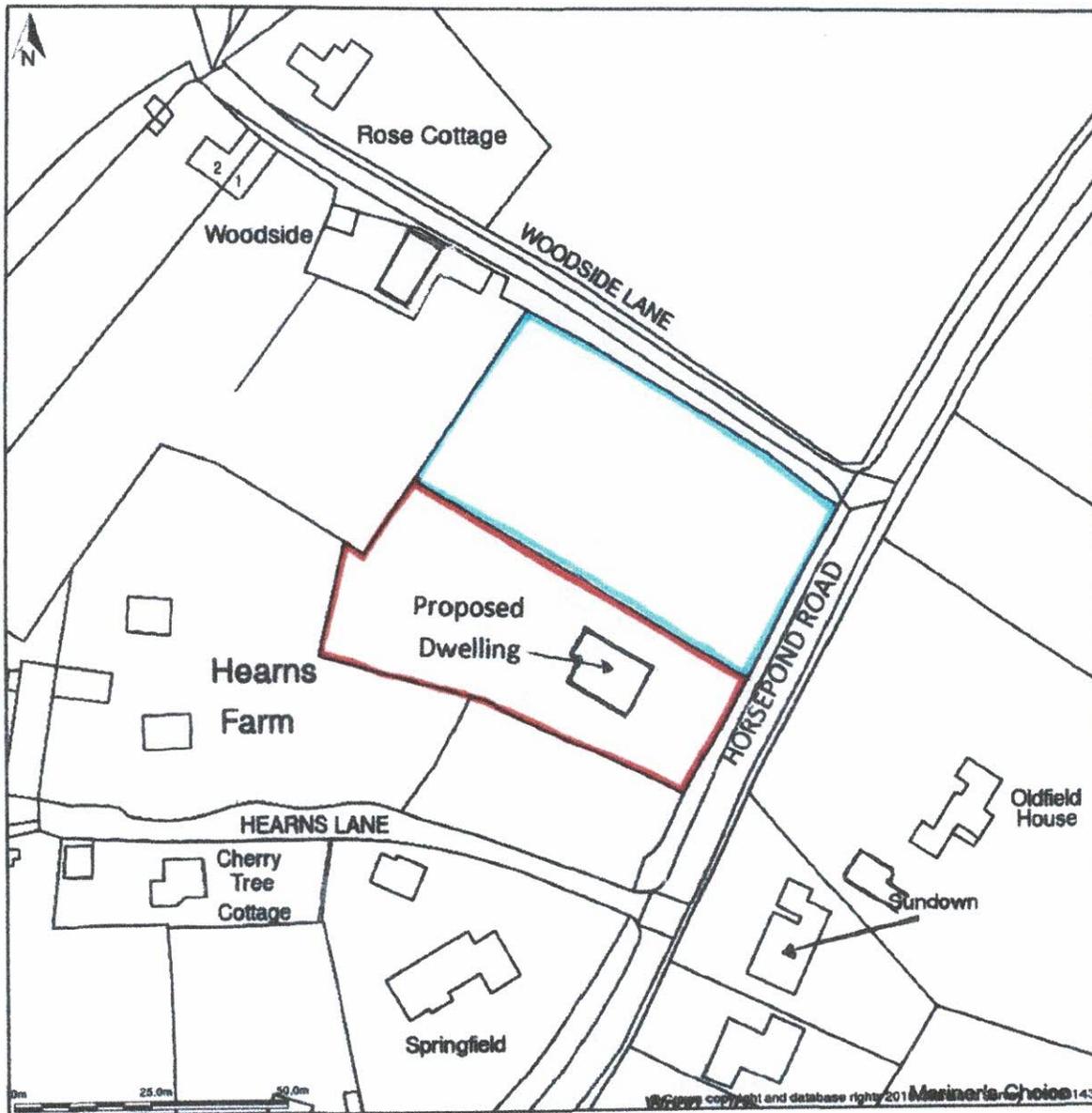
#### Other Material Considerations and presumption in favour of sustainable development.

- 6.13 The proposal would not necessitate the removal of any important trees although vegetation may need to be cut back alongside the roadside boundary to achieve the required visibility splays. There is no evidence of protected species on the site.
- 6.14 Paragraph 7 of the NPPF advises that there are three dimensions to sustainable development: economic, social and environmental. The economic and social benefits of the proposal would be limited due to only one dwelling being proposed. However, the environmental impacts would be more significant due to there being substantial harm caused to the character and appearance of the site and its surroundings and the landscape qualities of the AONB. In my view the adverse environmental impacts of the proposal would significantly and demonstrably outweigh the limited benefits of the proposal.
- 6.15 The proposal is CIL liable but the charge cannot be calculated until detailed plans are provided.
- 6.16 In accordance with paragraphs 186 and 187 of the NPPF the Council takes a positive and proactive approach to development proposals. The Planning Service worked with applicant/agent in a positive and proactive manner by offering a pre-application advice service and by advising the applicant/agent of the issues that arose during the processing of the application. The applicant was informed of the council's concerns but amended plans could not satisfactorily resolve those concerns.

#### **7.0 RECOMMENDATION** **Ref.of Planning Perm**

1 : The application site comprises an area of undeveloped land forming part of a larger agricultural field within the Chilterns AONB. Due to the location of the site, the proposed development does not represent appropriate infill housing having regard to Policy CSR1 of the South Oxfordshire Core Strategy, and the proposal would detract from the undeveloped rural character and appearance of the site and its surroundings, and would fail to conserve the landscape setting of Gallowstree Common or the landscape qualities of the AONB. The adverse impacts of the development would significantly and demonstrably outweigh its benefit, and as such, the proposal would not comprise sustainable development as defined by local and national legislation and

Location Plan 1:1250



Site Plan shows area bounded by: 469170.64, 180275.87 469370.64, 180475.87 (at a scale of 1:1250) The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.

Produced on 29th Mar 2016 from the Ordnance Survey National Geographic Database and incorporating surveyed revision available at this date. Reproduction in whole or part is prohibited without the prior permission of Ordnance Survey. © Crown copyright 2016. Supplied by buyaplan.co.uk a licensed Ordnance Survey partner (100053143). Unique plan reference: #00109728-4AEB40

Ordnance Survey and the OS Symbol are registered trademarks of Ordnance Survey, the national mapping agency of Great Britain. Buy A Plan logo, pdf design and the buyaplan.co.uk website are Copyright © Pass Inc Ltd 2016

# Response 16

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 2022-03-23 B Knapp.pdf - [REDACTED]</li></ul>

## Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:</p>
<p>Yes, I request a public examination</p>

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:
<p>Please see email attachment.</p>

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Dr
<b>Name</b>	Brian Knapp
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	-
<b>Organisation representing (if relevant)</b>	-
██████████	██████████
██████████	██████████████████
██████████	██████████
██████████	
██████████	██████████
██████████████████	
██████████	██████████████████

**Whiteley, Rosalynn**

---

**From:** Brian Knapp [REDACTED]  
**Sent:** 23 March 2022 09:08  
**To:** Planning Policy S&V  
**Subject:** Re: Consultation on revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**\*\*EXTERNAL\*\***

I note the revised Appendix D7 alters the shape of the CFS8 site from a rectangle to triangle which now includes "... a well-defined defensible boundary ... provided to the west and south of the allocation as shown on D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement."

[REDACTED]

All that seems to have been achieved at this site, is to produce a cramped collection of houses that are completely out of keeping with the character of the road. The revision simply makes this worse. To say nothing of the fact that the development is demonstrably unnecessary anyway.

[REDACTED]

The proposed development of 3-4 houses would be very different in both scale and layout to the existing houses on Tokers Green Lane and give no buffer to existing houses. Such incompatibility is inconsistent with the requirements of Policy HDA in the Kidmore End NDP.

Your letter states that I may request the need for a public hearing. There is an unwillingness of the Kidmore End Parish and its NDP Steering Group to engage with residents most impacted by the proposed development. A public hearing might at the very least get them to face up to explaining their unfounded decisions.

Yours sincerely

Dr B J Knapp  
[REDACTED]

This email originates from outside of the council.

Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.

If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

# Response 17

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: 2050AE~1.PDF - [redacted]
- File: 20F467~1.PDF - [redacted]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

Please see email attachment.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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>	Dr
<b>Name</b>	Kristian Hamer
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	-
<b>Organisation representing (if relevant)</b>	-
██████████	██████████
██████████	██████████████████
██████████	██████████
██████████	██████████
██████████	██████████
██████████████████	
██████████	██████████████████████████████

## Whiteley, Rosalynn

---

**From:** Kris Hamer [REDACTED]  
**Sent:** 23 March 2022 11:54  
**To:** Planning Policy S&V  
**Subject:** Comment on Revised Appendix D7 of the draft Kidmore End NDP

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam,

I am writing to share my view on the revised Appendix D7 of the draft NDP which proposed an alternative shape to the CFS8 site.

The revised shape and size of the site has the benefit of retaining the footpath through the field which has been in use for at least 20 years and was closed off to the public in December 2019. If the NDP is accepted with the revised shape of CFS8, then I suggest recognition of the footpath is part of the agreement for a development at the site. In the absence of that, members of the community will seek the reopening of the footpath by application to Oxfordshire County Council.

On the specifics of the proposal, the revised shape together with the retention of 4 new properties at the site means they would need to be very small houses, with tiny gardens. This would be very different in both scale and layout to the existing houses on Tokers Green Lane and is therefore inconsistent with the requirements of Policy HDA of the draft NDP which states that “.... the development of a site must respond to, and be in keeping with, the local character using Local Character and Landscape Policies as a guide.” Proposing a development of 3-4 houses on CFS8 would be 2-3 times denser than existing properties on Tokers Green Lane. Such a plan is clearly not in keeping with the local character of Kidmore End village. The houses would essentially 'stick out like a sore thumb'.

I do support the revised boundary treatment requirements which respond sensitively to the new edge of the village.

All of these policies are only as good as their implementation during the planning application process. Too many requirements are left as reserved matters for planning officers to determine after planning permission is granted, and I see are often waved. Hence the community ends up with developments not according to the application they were consulted on. Furthermore, applicants make subsequent applications to revise the terms of the planning permission and the community is not consulted on these either. These practices are clearly an abuse of process and revisions should be subject to further review by the Parish Council or householders directly.

Yours faithfully,  
Dr Kristian Hamer

[REDACTED]

---

This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

---

## Whiteley, Rosalynn

---

**From:** Kris Hamer [REDACTED]  
**Sent:** 23 March 2022 12:53  
**To:** Planning Policy S&V  
**Subject:** Comment on Revised Appendix D7 of the draft Kidmore End NDP

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam,

Further to my previous email earlier today, I missed one crucial point.

I would like to request a public hearing so that the revision of the NDP can be properly explored because the it has not been consulted upon and as outlined in my previous message, has knock on implications for the nature of the development and the broader appearance and cohesion of the housing stock in Kidmore End.

Furthermore, the public hearing would provide residents with the opportunity to highlight a number of serious failings in the way the NDP has been developed and how decisions have been taken. These failings include the absence of an objectively assessed need for more houses within the Parish and the decision to offer land for development on productive agricultural land within the Chilterns Area of Outstanding Natural Beauty. A public hearing would add rigour to the process of open public engagement – something that has not been provided so far by the Parish Council and its NDP Steering Group.

The position of the Parish Council is that the referendum provides the community with the ultimate say on whether the NDP is adopted or not. This approach is not the way democratic bodies should operate - take it or leave it. KEPC should properly engage with all sections of its community, including those it believes disagrees with its policies. Only through discussion and debate does a consensus emerge from which the weaker method of decision by binary vote at the ballot box is carried out. In my view, it is possible to reach a draft NDP fit for a public vote quite easily, but this requires our Parish Council and the Steering Group it hosts to be open and less defensive to alternate views. Had there been better engagement earlier with residents, the revision of Appendix D7 may not have been necessary. The NDP is being unravelled during the inspection process because of the inadequacies of the public consultation. I believe a public hearing will facilitate a resolution of the discontent in the community and enable a coherent NDP to be moved forward to a public vote.

Yours faithfully  
Dr Kristian Hamer

[REDACTED]

---

This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

---

# Response 18

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 2067F0~1.PDF - [REDACTED]</li></ul>

## Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:</p>
<p>Yes, I request a public examination</p>

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:
<p>Please see email attachment.</p>

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

**Title** -  
**Name** Sarah Wilkinson  
**Job title (if relevant)** -  
**Organisation (if relevant)** -  
**Organisation representing (if relevant)** -

██████████	██████████
██████████	██████████████████
██████████	██████████████
██████████	
██████████	██████████
██████████████████	
██████████	██████████████████

**Whiteley, Rosalynn**

---

**From:** Sarah Wilkinson [REDACTED]  
**Sent:** 24 March 2022 07:45  
**To:** Planning Policy S&V; Planning South  
**Subject:** Re: Consultation on revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

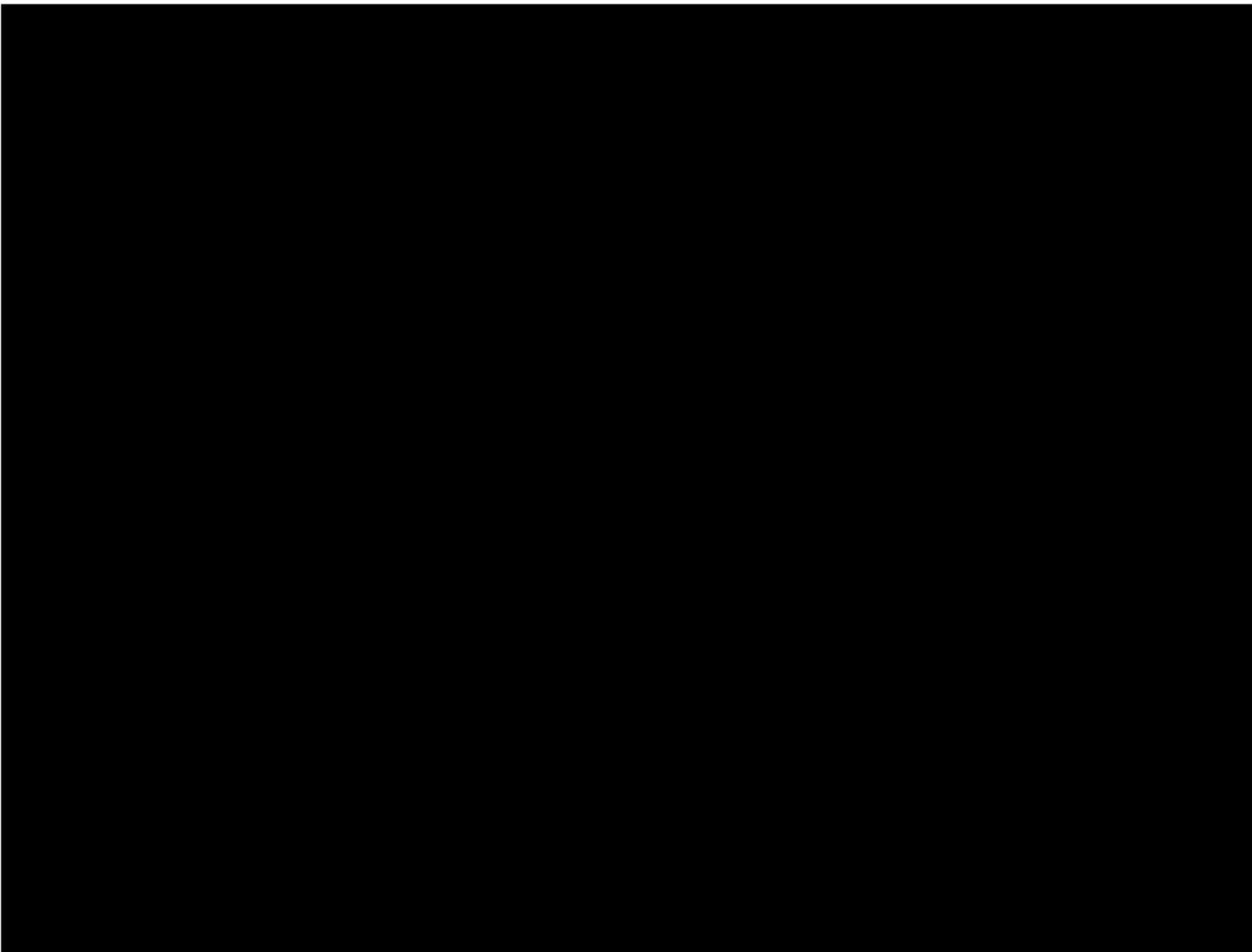
---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam

Whilst I fully support the detailed and technical email sent by my neighbour Mr A McAslan, and am in full support of all the issues he raises, I felt that I would like to offer some personal thoughts on the Kidmore End NDP.



[REDACTED]  
[REDACTED]  
[REDACTED] Tokers Green Lane is narrow and dangerous as it is without adding an access road to the proposed properties directly opposite the turning into Butler's Orchard. The open view described in Appendix D7 is only open if you stand in front of the gates [REDACTED]

The proposed site, although reduced, is approximately the size of one existing property at this end of the village and fail to see how having 3 to 4 houses on it, with the associated services, would be viable, let alone in keeping with the existing properties.

The footpath shown going across the fields has been in constant use for as long as I can remember, and I have been walking across the fields for the last 50 years.

With regard to community engagement from the NDP Steering Committee, I can assure you that at no time was my Mother consulted, invited to attend a meeting or given any information. This completely goes against their stance of full community involvement. As Mr McAslan details, they have been evasive, not willing to engage with affected residents and I therefore feel that the best course of action would be for a public hearing before anything is decided. I did attend the meeting last year when only 4 members of the Parish Council turned up and voted to approve the NDP. We were not allowed access to the room, no provision was made for people kept outside to hear what was going on and members of the NDP Steering Group had prepared statements based on confidential information Mr McAslan had sent to the Chair which had been passed on.

I also understand that a planning application is in progress on another of the sites from the call to sites process – the land at the end of Coopers Pightle. The NDP did not approve this as a site despite it not being used for agriculture – and has not been for the last 50 years at least – whereas the land in question has constantly been in productive use. I also understand that the planning application – and another one in Wood Lane in Kidmore End for a newbuild house – would not replace the site opposite my house – this seems very strange bearing in mind that there is no actual call for new development in Kidmore End.

Along with the development at the Reformation Pub in Gallowstree Common for 3 houses and a vet, the 4 houses at the end of Coopers Pightle and the one in Wood Lane surely this has already exceeded an unnecessary planning target?

Best regards  
Sarah Wilkinson

Sent from [Mail](#) for Windows

This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

# Response 19

## Respondent Details

### Information



Q1. Are you completing this form as an:

Individual

## Your comments

Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: 2022-0~1.PDF - [REDACTED]
- File: POSTPU~1.PDF - [REDACTED]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

Please see email attachment.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

**Title** -  
**Name** Stephen Roe  
**Job title (if relevant)** -  
**Organisation (if relevant)** -  
**Organisation representing (if relevant)** -

██████████	████████████████████
██████████	██████████
██████████	
██████████	
██████████	██████████
██████████████████	
██████████	████████████████████

## Whiteley, Rosalynn

---

**From:** Stephen Roe <stephen.john.roe@gmail.com>  
**Sent:** 24 March 2022 08:14  
**To:** Planning Policy S&V  
**Subject:** RE Consultation on revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan  
**Attachments:** PostPublicityKKEGResponse.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam,

Thank you for your email of 3 March 2022 inviting me to comment on the revised Appendix D7 of the Kidmore End Neighbourhood Development Plan (NDP).

A) Does revised Appendix D7 address the concerns I have already raised?

### Nature of the Area

This plan contemplates the development of housing on a green field site that is has been employed as productive arable land for living memory and therefore the permanently destruction and substantial loss to the natural environment of a substantial area of undeveloped green field land. The site lies to the south of the historically developed village of Kidmore End and reduces the amount of South Oxfordshire protected green belt between here and the north of Reading. The site lies within the Chilterns Area of Outstanding Natural Beauty and the application is made in the light of the recent announcement that DEFRA is actively considering the conversion of this AONB to full National Park status (<https://deframedia.blog.gov.uk/2021/06/24/coverage-of-defra-and-natural-englands-announcement-on-protected-landscapes/>)

There are multiple sites that are more suited to the development of housing within the parish that would allow for infill and/or brownfield development, such as the recent development of the Fox Inn at Cane End and the proposed development of the Reformation pub in Gallowstree Common and the approved plans for a new house adjacent to Kano in the village of Kidmore End.

In particular I note that the development proposal of the Reformation pub site was approved and is now proceeding since the publicity period of the NDP proposal.

It should also be noted that very large areas of the neighbouring parishes of Sonning Common and of Peppard Common (Kingwood, Stoke Row), have already been consumed by or are now committed to approved development and that SODC's planning requirement for the area has already been surpassed. I further note the recent approval of the Reading Golf Club site in RBC directly adjacent to Kidmore End Parish that will lead to the provision of approx. 400 houses.

### Site Specific Concerns

There is very poor access to the proposed CFS08 site from a rural country lane - Tokers Green Lane - which carries substantial traffic during the school drop off and pick up hours. The section of road proposed for access is prone to regular flooding. There is no mains drainage.

## Alternative Provision

In the event that SODC grants planning permission to additional housing within the Parish of Kidmore End that fulfils the (unsubstantiated and unnecessary) demand claimed in the NDP, such as the request for development adjacent to Kano, the development of new housing on the Reformation Pub or adjacent grounds, or the CFS10 site adjacent to Cooper's Pightle, then logic dictates that the totally unnecessary promotion and destruction of CFS8 should be avoided by a provision to adapt the NDP to any new approved developments.

The revised appendix D7 does nothing to address these fundamental objections. The plan review process has failed to fulfill its remit in this regard.

### B) Are the Appendix D7 revisions compatible with policy requirements?

I note the revised Appendix D7 alters the shape of the CFS8 site from a rectangle to an (almost) triangle which now includes "... a well-defined defensible boundary .... provided to the west and south of the allocation as shown on D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement." [Extract from the notes at Appendix D7.]

I welcome the reduced frontage of the site and triangular shape which now provides an open view of the field from Butlers Orchard and the field gate on Tokers Green Lane. The proposed minimum 3m deep boundary on the south and west of the site would indeed be consistent with a typical village boundary of Kidmore End village.

The proposed development of 3-4 houses would therefore be very different in both scale and layout to the existing houses on Tokers Green Lane. Such incompatibility is inconsistent with the requirements of Policy HDA in the Kidmore End NDP.

This emphasises the unsuitability of this particular site, and the proposal to sacrifice green field land in general.

### C) Do the Appendix D7 revisions address group concerns already raised?

This response is also made in the light of and to continue the points made by the Keep Kidmore End Green group during the Post Submission publicity period of the NDP which I provide as an attachment hereto for ease of reference.

I emphasize that none of the sections of this communication have been adequately addressed in revision D7 and this, once again, is evidence of the failure of the NDP Steering Group, the Parish Council and now the SODC examiner to adequately engage, respond and to take into account the views of the community. Specifically:

#### Section 1: Introduction (Basic Conditions Statement)

The revised appendix D7 does nothing to address these fundamental objections. The plan review process has failed to fulfill its remit in this regard.

Furthermore recent planning applications that have received approval or have been built such as the Reformation Inn location in Gallowstree Common and the development of 5-6 properties at the Fox Inn location at Cane End have substantially over achieved the housing allocation requirement upon which the NDP rests. Neither of these sites were included in the call for sites process.

It follows that any need addressed by the Kidmore End NDP has already been filled and there is no longer any requirement (if there ever was) to sacrifice a green field of productive agricultural land at CSF8.

Therefore, I hereby request that the NDP be withdrawn immediately and the SODC review process reject the NDP submission.

## Section 2: Legal requirements

The revised appendix D7 does nothing to address these fundamental objections. The plan review process has failed to fulfill its remit in this regard. This failure to meet the legal requirements has not been addressed.

## Section 3: Conformity with national policy / advice

The revised appendix does nothing to address these fundamental objections. The plan review process has failed to fulfill its remit in this regard. This failure to conform with the national policy has not been addressed.

## Section 4: Contribution to sustainable development

The revised appendix does nothing to address these fundamental objections. The plan review process has failed to fulfill its remit in this regard. This failure to conform with the contribution to sustainable development has not been addressed.

## Section 5: Conformity with strategic policies

I repeat this section of the attachment (*italics*) to hopefully remind the planners and examiners of their core duty:

*SODC's ENV1 policy (Landscape and Countryside) states that: "... The highest level of protection will be given to the landscape and scenic beauty of the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs). Development in an AONB or affecting the setting of an AONB will only be permitted where it:*

- conserves, and where possible, enhances the character and natural beauty of the AONB; and*
- is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB."*

*The draft NDP offers only one site for housing development – a site on productive agricultural land in the Chilterns AONB. The Plan makes no attempt to explain how such a development will conserve and where possible enhance the character and natural beauty of the AONB. Nor does it explain how such a development will promote understanding or enjoyment of the AONB. Furthermore, by proposing to build on a site which is currently productive agricultural land, the Plan will result in an economic loss, not an economic benefit to the Parish.*

*Indeed, the primary argument in the Plan for offering land for development, despite there being no requirement or objectively assessed need, is to demonstrate a positive approach to growth. It makes no attempt to demonstrate that such a development is consistent with SODC's ENV1 policy.*

*We therefore challenge the conclusion in Table 3 of the Basic Conditions Statement that the Chilterns AONB and its Setting policy (LPCS) policy is in general conformity with the strategic policies and non- strategic polices of the NDP, including the Housing Allocation Policy (HDA).*

The revised appendix does nothing to address these fundamental objections. In fact it substantially increases the housing density in this part of the village of Kidmore End the revision D7 moves the proposed plan even further from the requirement to conserve the AONB setting.

Your letter states that I may request the need for a public hearing. In my earlier comments on the Regulation 16 draft I emphasised the unwillingness of the Kidmore End Parish and its NDP Steering Group to engage with residents most impacted by the proposed development. A public hearing would provide residents with the opportunity to highlight a number of serious failings in the way the NDP has been developed and decisions taken, not least the absence of an objectively assessed need for more houses within the Parish and the decision to offer land for development on productive agricultural land within the Chilterns Area of Outstanding Natural Beauty. A public hearing would add rigour to the process of open public engagement – something that has not been provided so far by the Parish Council and its NDP Steering Group.

Kind regards,

Stephen Roe MA (Oxon)

--  
Stephen Roe  
Greenwich Cottage  
Kidmore End  
Reading RG4 9AY  
UK



This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

# Kidmore End Neighbourhood Plan - Post Submission Publicity Period

Q1. Are you completing this form as an:

Organisation

Q2. You can provide your comments on the Kidmore End 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 and is also available on our website with the other consultation documents. If you are commenting on a specific section or a supporting document, please make this clear. After this post submission 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.

I am writing on behalf of Keep Kidmore End Green - a group which represents the collective views of 21 residents living in the village of Kidmore End: Clive Cottage, Greenwich House, Lygrove, Strathfillan, St Fillan, The Post House, Vine House and Willow House of Tokers Green Lane; Arenal, Struanhill, and The Hawthorns of Butlers Orchard; and Little Orchard of Coopers Pightle.

The comments below follow the same structure as the Basic Conditions Statement.

## Section 1: Introduction

The Basic Conditions Statement refers to eight key documents which represent the evidence base for the Kidmore End NDP. Your attention is drawn to the efficacy of two of the documents.

- The evidence base includes a Household Survey conducted in 2018. The survey was held at a time when SODC stated the housing requirement was for 6-13 new homes to be built by 2035, all within the village of Kidmore End. In December 2018, SODC accepted its original calculation was incorrect and said the target for 2035 had been achieved as sufficient houses had already been built in the Parish since 2011. The questions posed in the Household Survey of May 2018 and the answers provided were predicated on the need to identify sites for 6-13 houses, which was no longer the case. No formal local need has been objectively established for more houses in the Parish, and it is misleading and disingenuous for the Plan to justify the 'need' based on the May 2018 survey.
- The evidence base includes the Community Survey of September 2019. Only 129 residents from an assumed adult population of 1,104 responded to the questionnaire – representing an 11.6% response. Ninety residents indicated their full support in principle to allocate a site for housing development. This represents only 8.2%, i.e. one in twelve of adult residents in the Parish. Such a low figure should not be used to demonstrate community support for allocating a site when there is no SODC requirement and no objectively assessed local need.

## Section 2: Legal requirements

The Basic Conditions Statement states that Kidmore End Parish Council is a Qualifying Body and "... is therefore authorised to act in relation to the production of a Neighbourhood Plan covering the Neighbourhood Area." In practice, the Council delegated the work of producing the Plan to a Steering Group, and invited the Group to prepare Terms of Reference (TOR) which defined its structure and responsibilities. The following issues should be noted:

- There is no evidence in the Minutes of the Council's meetings that the TOR were approved and accepted by the Council. As such the status, authority and accountability of the Group would appear to lack legal foundation.
- Although reports prepared by the Steering Group refer to sub-groups which led the call for sites process and the development of NDP policies there is no evidence that TOR were prepared for any sub-groups. As such the status, authority and accountability of the sub-groups would appear to lack legal foundation.
- The Steering Group TOR state that "... the Steering Group will decide whether to admit the press and public to its meetings." However, in response to a request from members of the Keep Kidmore End Green

group to attend NDP meetings, the Chair of the Steering Group said the attendance of the public would not be allowed. Copies of correspondence can be provided if requested by the External Examiner.

- The Steering Group TOR state that "... members will receive an agenda paper for meetings at least 5 days prior to the meeting (and) any documents which are to be considered prior to a meeting should be circulated at least 5 working days prior to a meeting." At a meeting of the Steering Group on 22 January 2019, members were invited without prior notice to vote to include a site for development in the draft Plan.

The meeting was chaired by the Deputy Chair of the Steering Group in the absence of the Chair. The intention to vote was not included in the Agenda and the key document providing guidance on the suitability and availability of sites was not made available to members of the Steering Group in advance of, or indeed during, the meeting. This approach was inconsistent with the TOR, and so the result of the vote should have been considered null and void.

The Basic Conditions Statement states that Kidmore End NDP contains policies which relate to the development or use of land and are therefore appropriate for inclusion within a Neighbourhood Plan. However, the Plan does not include a policy on the economic needs of the Parish and its communities. The absence of a policy on economic needs was raised recently (12 July 2021) by the Principal Economic Development Lead SODC when commenting on a planning application for the re-purposing of the Reformation Pub in Gallowstree Common to become a veterinary practice. A policy on economic needs would also have assisted in assessing the suitability of the conversion of a former and disused farm in the village of Kidmore End to become artists' studios. Indeed, a policy on economic needs would help clarify the economic component of sustainable development within the Parish.

### Section 3: Conformity with national policy / advice

The National Planning Policy Framework (NPPF) states that ".....a qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community (inter alia): is kept fully informed of what is being proposed; is able to make their views known throughout the process; has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order; and is made aware of how their views have informed the draft neighbourhood plan or Order." The following issues should be noted:

- Residents were first informed of the NDP Steering Group's decision to offer land for housing development at a 'community event' in September 2019. The event was run as a briefing session rather than as a discussion of the options. Prior to the event the NDP Steering Group made no attempt to seek the views, either formally or informally, of the residents who were most likely to be affected by the proposed housing development. We consider this lack of engagement to be inconsistent with Paragraph 47 of Guidance on Neighbourhood Planning published by the Ministry of Housing, Communities and Local Government.

- Following a meeting of the Parish Council, the Keep Kidmore End Green (KKEG) group wrote to the Chair of the Steering Group on 25 November 2019 requesting that residents be allowed to attend Steering Group meetings as observers and ideally be given the opportunity to make statements. This would be consistent with Objective 4 of the draft Plan as set out in the Housing Requirement and Allocation paper "... to engage with the Parish's communities at all stages in the development and implementation of the NDP to ensure the Plan meets their different needs and expectations, thus maintaining a strong sense of community." On 11 December 2019, the Chair responded stating that members of the KKEG group would not be allowed to attend meetings of the Steering Groups as "... members with an interest on a particular site are excluded from discussions/considerations relating to that site."

- On 6 January 2020, the KKEG group wrote again to the Chair of the Steering group with four specific questions regarding the methodology adopted by AECOM to assess the suitability of each site for development, and in particular the availability of community facilities and services. On 20 January 2020, the Chair informed the residents that the Steering Group "... do not intend to engage in further exchange of correspondence with you or any other groups." The position adopted by the NDP Steering Group was clearly inconsistent with NPPG guidance to be inclusive and open in the preparation of its Plan.

- On 11 June 2020, the KKEG group submitted a 27 page critique of the Kidmore End NDP planning process and Plan to the Chairman of the Parish Council. A copy of the critique is enclosed with this letter. On 23 July 2020, the Chair of the NDP Steering Group responded by saying that "... the local community will be formally consulted on the draft proposals in the emerging neighbourhood plan before the plan is submitted to the district council. If any party feels their concerns have not been addressed throughout the preparation of the plan, they will have an opportunity to raise their concerns again before the plan is independently examined."

The NPPG states that ".....a qualifying body must consult any of the consultation bodies whose interest it

considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community.” The following issues should be noted:

- The NDP Steering Group failed to contact the Diocese of Oxford during the call for sites process in 2019 despite the Diocese owning 2.8 ha of unused land in the Parish which has the potential for housing development and/or agricultural use. Indeed, David Mason (Director of Glebe & Buildings, Diocese of Oxford) stated at a meeting on 21 May 2021 that he has only recently been made aware of the draft Kidmore End NDP.
- The NDP Steering Group failed to contact the Primary School in Kidmore End during the call for sites process in 2019 despite the school being the largest employer in the Parish. Prior to submitting the Regulation 16 draft NDP to SODC, the Kidmore End Parish Council reviewed the draft at an extraordinary meeting on 1 July 2021. Clause 7.6 of Arnold-Baker on Local Council Administration, Twelfth Edition states that “.... a meeting of a local council must be open to the public and the press.” Consequens est, the facilities provided at the meeting should enable the public and the press to be able to hear the discussions and the reasons behind any decisions taken. However, members of the public were instructed to stand outside the room where the meeting was held. A door was left open, but it was impossible for the twenty or so members of the public to hear the councillors or the Clerk speak. Although the room has a public address system it was not used during the meeting, nor was any attempt made to establish a hybrid approach which would have allowed members of the public to hear the discussions and the reasons behind any decisions taken.

#### Section 4: Contribution to sustainable development

The Basic Conditions Statement states in Paragraph 4.1 that “.... there are three over-arching objectives to sustainable development: economic, social and environmental. The three objectives are mutually dependent. In addressing the above basic conditions, the NDP pays particular regard to NPPF, Paragraph 9, which requires that: planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”

We challenge this conclusion as the economic component of sustainable development is inadequately addressed in the Regulation 16 draft of the NDP. As stated earlier in this letter, the draft NDP does not include an objective or a policy which addresses the economic needs of the Parish.

#### Section 5: Conformity with strategic policies

SODC’s ENV1 policy (Landscape and Countryside) states that: “.... The highest level of protection will be given to the landscape and scenic beauty of the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs). Development in an AONB or affecting the setting of an AONB will only be permitted where it:

- conserves, and where possible, enhances the character and natural beauty of the AONB; and
- is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB.”

The draft NDP offers only one site for housing development – a site on productive agricultural land in the Chilterns AONB. The Plan makes no attempt to explain how such a development will conserve and where possible enhance the character and natural beauty of the AONB. Nor does it explain how such a development will promote understanding or enjoyment of the AONB. Furthermore, by proposing to build on a site which is currently productive agricultural land, the Plan will result in an economic loss, not an economic benefit to the Parish.

Indeed, the primary argument in the Plan for offering land for development, despite there being no requirement or objectively assessed need, is to demonstrate a positive approach to growth. It makes no attempt to demonstrate that such a development is consistent with SODC’s ENV1 policy.

We therefore challenge the conclusion in Table 3 of the Basic Conditions Statement that the Chilterns AONB and its Setting policy (LPCS) policy is in general conformity with the strategic policies and non-strategic policies of the NDP, including the Housing Allocation Policy (HDA).

#### Section 6: Compatibility with EU obligations / prescribed conditions

We have no comments on the compatibility of the NDP with EU obligations and/or prescribed conditions.

## Section 7: Conclusions

We challenge the conclusion provided in the Basic Conditions Statement that "... the Plan meets the basic conditions set out in Schedule 4B of the Town and Country Planning Act 1990 (as amended) and Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended)." In order to seek clarity on the issues we have raised in this letter, we request the Independent Examiner to require a public hearing to be held.

### Q3. You can upload supporting evidence here.

- File: Kidmore End NDP comments.pdf
- File: A critique of the Kidmore End NDP(reduced size).pdf

Q4. If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. 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.

(1) The Plan should remove its recommendation to include site CFS8 for housing development UNLESS the Plan can provide supporting evidence in the form of an objectively assessed need for additional housing within the Parish.

(2) The Plan should be amended to adequately address the issues raised in the Critique of June 2020.

(3) The Basic Conditions Statement should be amended to reflect the comments made above.

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

The process adopted by the Parish Council and its NDP Steering Group failed to adequately engage with communities to establish their needs and expectations. In particular it refused to allow members of the public to attend meetings of the NDP Steering Group despite the right to attend such meetings being included in the TOR for the Group.

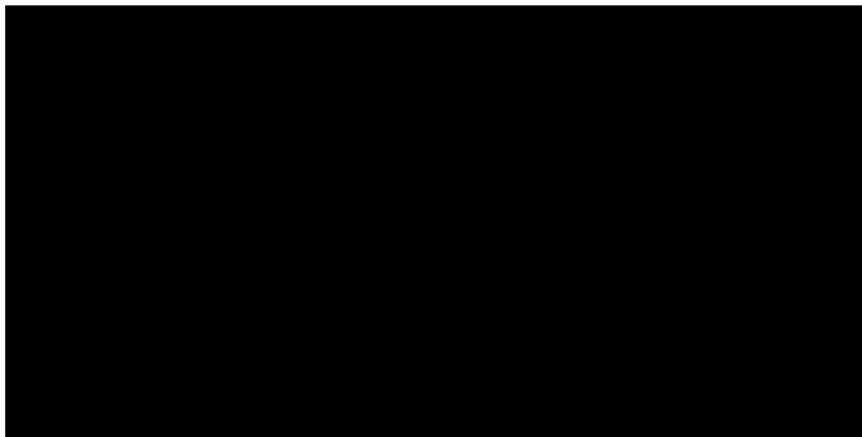
A public hearing would enable the Parish Council to be accountable to the public for the statements it has made in the draft Plan and for the process it adopted in developing the Plan.

Such clarity and accountability are essential in advance of any referendum.

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, postal address and email (where applicable) will be sent to an independent examiner to consider. 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>	Mr
<b>Name</b>	Alastair McAslan
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	-



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

Q9. How did you find out about the Kidmore End Neighbourhood Plan consultation?

Poster

Word of mouth

# Response 20

## Respondent Details

Information	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments

<p>Q2. You can provide your comments on the revised version of Appendix D7 - Housing Allocation of the Kidmore End 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, one of the supporting documents to the Neighbourhood Plan. Please only comment on the revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan. 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, please attach these to your response.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 20F6F5~1.PDF - [REDACTED]</li></ul>

## Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Kidmore End Neighbourhood Plan:</p>
<p>Yes, I request a public examination</p>

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:
<p>Please see email attachment.</p>

## Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email (if applicable) and postal address will be sent to an independent examiner to consider. 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.

**Title** -  
**Name** Nicola and Andy Watts  
**Job title (if relevant)** -  
**Organisation (if relevant)** -  
**Organisation representing (if relevant)** -

██████████	██████████
██████████	██████████
██████████	
██████████	
██████████	
██████████	
██████████	████████████████████

## Whiteley, Rosalynn

---

**From:** [REDACTED]  
**Sent:** 24 March 2022 21:03  
**To:** Planning Policy S&V  
**Subject:** Consultation on Kidmore End NDP

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**\*\*EXTERNAL\*\***

---

Dear Sir/Madam,

### **Re: Consultation on revised Appendix D7 - Housing Allocation of the Kidmore End Neighbourhood Plan**

Thank you for your communication inviting us to comment on the revised Appendix D7 of the Kidmore End Neighbourhood Development Plan (NDP).

We note the revised Appendix D7 alters the shape of the CFS8 site from a rectangle to an almost triangular shape which now includes "... a well-defined defensible boundary .... provided to the west and south of the allocation as shown on D7 with a minimum width of 3m native hedgerow and shrub planting, widening as shown in the plan to reflect the typical village boundary treatment here, and interspersed with trees, to soften the edge of the settlement." *[Extract from the notes at Appendix D7.]*

We welcome the reduced frontage of the site and new shape which now provides an open view of the field from Butlers Orchard and the field gate on Tokers Green Lane. The proposed minimum 3m deep boundary on the south and west of the site would indeed be consistent with a typical village boundary of Kidmore End village.

Our main concern with the proposed change is the lack of space in the site for 3-4 houses of 2-3 bedrooms. If 3-4 houses are built on the proposed CFS8 site, taking into consideration the new proposed minimum 3m deep boundary on the south and west of the site, a) it would be very, very cramped and b) would not be in keeping with those houses on Tokers Green Lane, which goes against the requirements of Policy HDA in the Kidmore End NDP.

We feel that there should be a public hearing to discuss this and other points as the Kidmore End Parish and its NDP Steering Group have been unwilling to engage with those residents most impacted by the proposed development. A public hearing would provide us residents with the opportunity to highlight a number of serious failings in the way the NDP has been developed and decisions taken, not least the absence of an objectively assessed need for more houses within the Parish and the decision to offer land for development on productive agricultural land within the Chilterns Area of Outstanding Natural Beauty. A public hearing would add rigour to the process of open public engagement – something that has not been provided so far by the Parish Council and its NDP Steering Group.

With all the recent planning applications that have been approved recently, the fact that there is no current need to offer any land for properties as the quota has already been filled, that the site

offered by Kidmore End NDP is an agricultural land farmed regularly, we feel there is not a need for these properties, therefore we feel that a public hearing is a real must discuss these points further.

Kind regards  
Nichola & Andy Watts



This email originates from outside of the council.

Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.

If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.