

Joint Henley & Harpsden Neighbourhood Development Plan (JHHNP) Review

Response to Examiner's Clarification Note

General

For my information what is the current status of the Conservation Area Appraisal and Management Plan?

1.1. The Town Council, working collaboratively with South Oxfordshire District Council, have prepared a revised Conservation Area Appraisal and Management Plan (CAAMP) Document. South Oxfordshire District Council are currently carrying out a review of the conservation area in Henley-on-Thames, which was previously reviewed in 2004. As part of this process the district council are inviting comments on the revised Conservation Area Appraisal and Management Plan Document. Information on the consultation and the revised document is available from the Council website [here](#).

1.2. There are number of proposed additions and removals from the conservation area, which are:

- **Proposed additions to the conservation area:**
 - **Full length of Fair Mile (to junction with B480 Lower Assendon) including the Grove**
 - **Buildings between Greys Road and Reading Road**
 - **Eastern end of St Andrew's Road**

- **Proposed removals from the conservation area:**
 - **Modern properties in Bowling Court and Pearce's Orchard**
 - **Modern properties in Leicester Court and Badgemore Lane**
 - **Dry Leas Sports Ground**
 - **Modern properties in Normanstead**
 - **Property 33a St Andrew's Road**

1.3. The consultation will close on the 25 May 2022, with the comments received reviewed and appropriate changes to the revised document will be made. The District Council will then proceed to adopt it via the cabinet process.

Policy ENV3

What is the status of the Town Council's Tree Strategy?

2.1. The Council has a policy which covers safety issues and day to day management of trees (found in appendix A) and a list of species which is included within appendix B. The Climate Emergency 2030 Working Group has agreed to write a Tree Strategy for adoption (CE2020WG Minute 24 3.11.20) to sit alongside this policy. The first step is to calculate the amount of carbon dioxide stored in trees on Council-owned land which has started and should be completed by end June 2022. The project will also examine how different approaches to managing and re-planting trees affects carbon storage and biodiversity. The Tree Strategy will then be produced for Council-owned land with longer terms goals for carbon sequestration and biodiversity enhancement and this should be completed by October 2022.

Policy ENV4

I have followed the audit trail provided in paragraph 5.30. However please can the Town Council provide information on the size of the proposed local green spaces 5/19/22/24/33?

3.1. The sizes of the proposed local green spaces are as follows:

- **5. Mill and Marsh Meadows – 14.56 hectares**
- **19. Gillotts – 1.02 hectares**
- **22. Waterman's Spinney – 2.42 hectares**
- **24. Henley College Woods – 3.6 hectares**
- **33. Harpsden Cricket Club – 2.8 hectares**

The maps in the Plan were sufficiently detailed to allow me to find the various local green spaces (LGSs). Nevertheless, they will not be suitable for development management purposes within the Plan period. I will be recommending that more detailed maps are included in any 'made' Plan similar in scale to those included in the Local Green Space Methodology.

4.1. Noted

In relation to proposed LGS 19 (Gillotts Wood) I saw that the proposed green space was part of a more extensive wooded area. I also saw that the Gillott School boundary fence ran through the wider area. For my clarity, please can the Town Council advise whether the proposed LGS is wholly within the Gillotts School site?

5.1. The proposed LGS is wholly within the Gillotts School site – the northern boundary is with the OCC bridleway, Peppard Lane. The area proposed is largely in line with the Natural England Priority Habitat Deciduous Woodland as shown by the image below. This shows the Natural England Priority Habitat in pale red, and the proposed Local Green Space is hatched. Cadastral parcels are also shown edged in black.



Policies SD1 a/b

These policies address important issues. However, they read a mission statements or ambition rather than as land use policies.

Please can the Town Council explain its thinking for the policies?

6.1. The Committee do consider this to be a land use policy but recognise that the wording of sd1a could be strengthened as set out below.

6.2. The Committee feel that it is important that the approach set out in these policies are taken to help minimise the environmental impact of buildings in terms of energy use and efficiency. A fabric first approach should be taken in the first instance and where that cannot be done then look at electrical or mechanical means.

6.3. Whilst Local Plan Policy DES10 deals with Carbon Reduction, the policy builds on DES10 and seeks to work collaboratively to deliver a locally distinctive approach. The supporting text of DES10 refers to the to the encouragement of a fabric first approach, it does not require developers to take this approach. By including this as a policy within the new Neighbourhood Plan, it provides an opportunity to encourage this approach within the policy.

6.4. The Neighbourhood Plan Committee (NPC) felt that a policy with further detail was required to deal with specific issues that apply in the Neighbourhood Plan (NP). One of these issues is ensuring that the existing historic building stock also contributes to carbon reduction and energy efficiency. Henley and Harpsden have many listed buildings and three Conservation Areas so this would be very important for this NP. The NPC felt that Local Plan fell short on dealing with these specific issues and that the review of the NP provided a great opportunity to deal with this and build upon the work of the CAAMP.

6.5. The NPC felt it was important that all of the relevant information was included within one policy to help them to apply national and local plan policy as part of the decision-making process.

6.6. This policy is underpinned by a breadth of evidence as illustrated in the Baseline Report and the NPC feel that this is adequate to support this policy approach.

6.7. The early drafting of the policy wording was supported by the Centre for Sustainable Energy (CSE). However, following the review by AECOM, the policy was subsequently 'watered down' which was a disappointment to the NPC. The main reason cited was due to potential impacts of the policy on viability.

6.8. The NPC would not want to lose this policy or for it to be watered down further, it is considered that this policy is important to achieve the ambitions and vision of the Plan and help towards the reduction in carbon emissions.

6.9. The intent of the policy could be more effectively presented with the proposed revised wording below. We believe that that the following amendments would address the examiners concerns by relating the policy wording more closely to development and the use of land. Specifically, Policy SD1a: Fabric First Approach Paragraph A, it would be beneficial if the wording was

updated, instead of 'would be recommended' insert 'should be implemented' as follows: A 'fabric first' approach to building design should be implemented to maximise the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems.

Policy SD3

This is an excellent policy. It is based on research and evidence. It is a first-class local response to Section 12 of NPPF 2021

7.1. Thank you.

Policy H1

The proposed policy reads more as a process than as a policy.

Please can the Town Council expand on its approach to the policy in general and how it adds value to the site-specific policies in particular?

8.2. The purpose of this policy is to ensure that new development delivers high quality design that draws upon the special interests of Henley and Harpsden. Seeking to achieve greater powers for the local communities to say what new development should look like and the Town and Parish Councils through the planning application decision-making process.

8.3. New development can present a challenge in Henley and Harpsden which retains its rural setting to the west, north and east in particular and is already densely developed in town centre itself. It is important that opportunities for new development are carefully-considered and well-designed to ensure the special interest and character of the area can be maintained.

8.4. The Committee feel that there are many aspects to create good design but a focus should be given to ensuring that developments;

- **respond to the existing local character and identity;**
- **are appropriate in their use, scale, height, density and massing;**
- **use the most suitable materials and colour palette; and**
- **are sensitively integrated into new and existing developments, promoting the amenity of all and sympathetic to existing housing.**

8.5. Henley's and Harpsden's buildings and setting, both within the Conservation Areas and outside, provide important contributions to the special quality of the area. Whilst Policy SD3: Local Character has a focus on Conservation Areas, this policy is trying to ensure good design across the Neighbourhood Plan Area (NPA).

8.6. The Committee feel that good design is very achievable in this area and should be a key part when considering new development. The purpose of having a policy in our NP is to provide planning officers greater powers to refuse or seek amendments as part of the planning application process to deliver good design.

8.7. Although this proposes a policy with a focus on allocated sites, the Committee feel that good design should be promoted in all instances. The examiner may consider it appropriate to apply these principles beyond allocated sites.

8.8. Policy H1: Design Brief This policy wording could be modified to better convey its intent of achieving good design and reduce the focus on process:

Development should demonstrate good quality design that respects the character and appearance of the existing area.

For all of the allocated sites listed within Policy DS1, a Design Brief must be produced for the whole site, setting out the principles for development on the submission of a planning application.

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

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

Development that fails to take the opportunities available to bring forward the considerations listed and fail to promote good design that enhances the local character and quality of the area and the way it functions will be discouraged.

Policies E2/E3

Both policies are affected by the changes made to the Use Classes Order in 2021. I will be recommending modifications to take account of this matter.

9.1. Noted.

Policy E4

I recognise that the policy is unchanged. However, it remains an important policy. Several opportunities for this type of development have already been taken. Others which may come forward in the future will contribute to sustainable development. The policy reinforces the importance of making the best use of land and buildings in the town.

10.1. Noted.

Policy T2

This is a good policy. During the visit I saw the extent to which the existing network provided good accessibility especially in the built-up area.

11.1. Thank you.

Policy T4

The policy takes a good approach.

Could the specific approach in Part B become quickly outdated as technology moves on?

12.1. The NPC accepts that Part B could become quickly outdated as technology moves on and would agree to it being amended; to remove reference to OCC Standards in Oxfordshire Electric Vehicle Infrastructure Strategy (2020-2025) and instead refer to the latest OCC standards for Electric Vehicles.

Policy T6

To what extent do parts A-C of the policy add any distinctive value to the approach already taken in national and local policies?

Is part D of the policy expecting a developer to undertake an assessment of the capacity of the residual car parking in the town to accommodate the town's overall parking needs? If so, would this approach be practicable?

13.1. Yes, it is complementary to national and local policies, which are included in the Local Plan and Oxfordshire County Council (OCC) standards.

13.2. The strategy for Henley-on-Thames (Local Plan Policy HEN1) sets out what is expected of the NP, and it includes to improve accessibility, car and cycle parking in the Town Centre, and pedestrian and cycle links. It is therefore necessary to include a policy on this to emphasise the importance of this in the NP.

13.3. The policy highlights the importance of parking which is a substantial issue within the NPA. This was highlighted as an issue within earlier public consultations. The NPC felt that the town needed a specific policy to cover the NPA and not all of South Oxfordshire. Henley has many terrace houses with on-street parking which brings with it local challenges and extreme pressure on the limited car parking available. This is an important issue locally and warrants a locally distinctive approach.

13.4. Overall, it considered that the way in which the Policy is presented, draws together components of national and local planning policy so that the user can find the elements in one place, adding local distinction to the decision-making process.

13.5. Part D is an important clause within the policy and the NPC feel it is important that it is retained. The Committee feel strongly that this should be a requirement for any development that proposes development in car parks across the Town.

13.6. The wording of Part D took inspiration from the made Stroud TC NDP which introduced a policy to deal with similar issues.

Policy DS1

The table in the policy helpfully explains how sites in the 'made' Plan (A1, C, E, F, J and X) are carried forward into the review of the Plan.

14.1. Noted.

General question

Plainly the six sites have not been developed so far. I have looked at the updated details in the AECOM site assessment reports.

What assurances do the Town Council have that the sites are available and deliverable within the Plan period? A response which relies on information from landowners/developers/ third parties (in whole or in part) would be acceptable.

- **Site A1: Land West of Fair Mile Around 72 – A full planning application was submitted in 2019 (ref: P19/S2350/FUL) and is currently being considered by SODC. This follows extensive pre-application discussions.**
- **Site C: Gillott's School Playing Field Around 50 – the landowners have confirmed that this is available and deliverable in the Plan Period.**
- **Site E: Empstead Works / Stuart Turner Mixed use including 42– the site promoters expects to submit a full planning application on at least part of the site within the next 12-18 months. If planning permission is obtained, then it would be expected that development could commence imminently with the completion of development expected within a 12-24 month period.**
- **Site F: Chiltern's End Around 27 - the site promoter expects to submit a planning application by April 2023. If planning permission is obtained, then it would be expected that development would commence on site would start in approximately Spring 2024 with a completion within a 25-month period.**
- **Site J: 357 Reading Road Around 50 – the landowner expects to submit an outline planning application before the end of 2022. If planning permission is obtained, the site would probably be sold to a developer. Work is likely to start in 2024.**
- **Site X: Henley Youth Club Around 23 – although as part of the submissions, the site promoters have advised that this would not be deliverable for housing. This site is one of the most sustainable sites within the Plan and the Committee would like to see this coming forward for housing. The 2020 housing needs assessment demonstrates that there is a need for houses including affordable houses. Furthermore, as demonstrated in the response to B & M Care, OCC cannot show that there is a need for care homes at this stage and therefore it is not appropriate to allocate for this use.**

See Appendix C for site deliverability evidence obtained from landowners and site promoters.

Site M1

The proposed site M1 will supply a significant amount of the additional proposed new housing in the neighbourhood area. It has also raised a series of representations from the development industry on the site-selection process. The Topic Paper makes three important statements about the site as follows:

- a) It is considered that the public benefit provided through this scheme would outweigh harm to the Area of Outstanding Natural Beauty (AONB).*
- b) The landscape sensitivity is influenced by the new housing being built on the existing allocation Site M: Highlands Farm.*
- c) (The site) is in conformity with South Oxfordshire Local Plan 2011 (saved policies) Policy H4 as the site (once the wider site construction is complete) is within the built-up area.*

Please can the Town Council expand on its approach to these matters?

a) Public Benefits

- 15.1** It is considered that this site would result in sustainable development, meeting the needs of the present without compromising the ability of future generations to meet their own needs (National Planning Policy Framework Paragraph 7).
- 15.2** Great weight has been given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection as required by paragraph 176 of the NPPF.
- 15.3** The site selection process has robustly explored all available options including those in and outside of the AONB.
- 15.4** The scale and extent of the site has been limited to reflect the location within the AONB, the amount of housing has been limited to 110 homes and employment to 1 hectare to ensure that the development responds sensitivity to the area. It will also allow sufficient space for internal open space, tree planting and landscape buffers.
- 15.5** The development would be sensitively located on the site with a landscape buffer along the northern and western boundaries and a strip of land being left on the northwestern boundary.
- 15.6** Specific design brief requirements are included in the policy wording to emphasise the importance of development conserving and where possible enhancing the landscape and scenic beauty of the AONB and ensuring that development responds to the site's environmental and landscape context, including the AONB. A Landscape and Visual Impact Assessment will be required to assess the impact of the proposed development on the landscape.
- 15.7** It is considered that the greatest public benefit would be the delivery of affordable housing that is required for the NPA, particularly affordable homes for rent and affordable home ownership dwellings, of which there is an immediate unmet need. The need is demonstrated in the 2020 Henley and Harpsden Housing Needs Assessment. The Local Plan makes it clear that the NP should seek to meet demonstrable local affordable housing needs, even where this would result in housing provision in excess of the outstanding requirement.
- 15.8** The site selection has been considered in the context of the requirements of the Local Plan and the scale of development possible on this site is necessary to go towards delivering houses to meet the affordable housing need. This site would deliver affordable housing in line with the most recent Local Plan Policy, which is currently Policy H9 requiring 40% affordable housing.
- 15.9** On top of this the site would also bring forward 20 community led housing units, which would provide additional homes for local people.

15.10 Plainly the development of this site would make a substantial contribution toward the provision of affordable houses in this area. Affordable housing including those for families would provide more job opportunities and use of local services and facilities. Affordable housing is also a national issue.

15.11 It is noted that the previous allocated site M adjacent to the site has provided the most affordable housing in the last 5 years. This site has delivered 49 of the 75 affordable homes delivered in the NPA over the last 5 years as shown in the table below.

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

15.12 The examiner for the Local Plan recognised that the market towns are sustainable towns with a reasonable range of facilities and should be expected to play a proportionate role in meeting the District's housing needs. The Neighbourhood Plan would not be able to achieve this without allocating for a larger site in the AONB. As set out in the Environmental Report included within our evidence base.

15.13 The site would also bring forward employment and community uses, with the provision of 1 hectare of employment land, including the relocation of the Chiltern Centre. This would provide public benefits and free up an existing site for housing.

15.14 Section 5 of the Environmental Report explains a process of developing growth scenarios for the neighbourhood plan in 2021. The Site Options Assessment (SOA) was a key input, but strategic factors also fed in, including the residual housing requirement from the Local Plan.

15.15 Paragraph 5.26 explains that one scenario is to meet and exceed ('buffer') this requirement by allocating Highlands Farm, and this scenario is taken forward for assessment as Scenario 1.

- 15.16 Any other scenario must involve a package of smaller sites, and attention immediately falls on two green-rated sites in Harpsden; however, the combined capacity of these sites (31 homes) falls short of what is required (34 homes).
- 15.17 Hence there is a discussion of alternative ways to meet the residual shortfall of (at least) 3 homes. One option is to allocate one or more of the four amber-rated sites in Harpsden, but this scenario is ruled-out as 'unreasonable' (paragraph 5.27).
- 15.18 The other option is to support a higher density scheme at 'Site C', which is the Gillotts School site allocated for 50 homes in the made neighbourhood plan. This is taken forward as Scenario 2.
- 15.19 The assessment of the two reasonable growth scenarios for the neighbourhood plan is presented across pages 14-17 of the Environmental Report, and serves to draw out a good range of the issues and opportunities associated with Scenario 1, both in an absolute sense and relative to Scenario 2.
- 15.20 Landscape sensitivities associated with Scenario 1 are clearly captured, as well as issues around proximity to the town centre (see discussion under 'air quality'). However, with regards to matters relating to car dependency, accessibility and wider 'population and communities' objectives (including, and notably, affordable housing), Scenario 1 is judged to be preferable to Scenario 2.
- 15.21 The NPC's reasons for supporting Scenario 1 and rejecting Scenario 2 are set out on page 18 of the Environmental Report. It is repeated in full here:

"The preferred approach is to take forward Scenario 1 as the basis for the Revised JHHNP. This approach is considered to broadly align with the findings of the assessment, which finds Scenario 1 to perform well in terms of the majority of key sustainability issues, both in absolute terms and relative terms.

It is recognised that the Area of Outstanding Natural Beauty (AONB) designation is a constraint to growth at Highlands Farm Northern Field. However, the SODC [Landscape Capacity Assessment](#) (2017) serves to indicate limited landscape sensitivity, and there will be good potential to take steps at the development management stage to mitigate landscape impacts, guided by policy set out in the Revised JHHNP.

With regards to Scenario 2, the assessment highlights a range of drawbacks, including on the basis that growth would be directed to the edge of Lower Shiplake rather than the edge of Henley. It is recognised that further scenarios could feasibly be explored that would involve focusing growth solely at the edge of Henley; however, all such scenarios are judged to be 'unreasonable' on the basis of the discussion set out in Section 5 of this report.

The process of defining and assessing growth scenarios serves to highlight that there are no easy choices, in respect of planning for growth at Henley. Nonetheless there is a need to make a choice, and the Committee views Scenario 1 as best representing sustainable development on balance. Importantly, the preferred approach will deliver benefits to the Neighbourhood Area and meet the requirements set out in the Local Plan."

- 15.22. The NPC stands by this statement, but recognises that the evidence provided by SODC Landscape Capacity Assessment (2017) is more accurately described as indicating *relatively* limited landscape sensitivity, specifically limited sensitivity in the context of Henley urban edge.
- 15.23. The NPC is in a position whereby the only alternative to the preferred growth scenario, as set out in the submission plan, is a scenario that is judged to perform worse on balance, having considered the full range of plan objectives and wider sustainability objectives. It is because there is no better performing alternative scenario that exceptional circumstances exist to support a major development in the AONB.
- 15.24. The NPC has given great weight to the AONB constraint, but the other options available are not considered to be acceptable. We consider there are exceptional circumstances and that the development proposed on this site is in the public interest.
- b) Landscape Sensitivity
- 15.25. As part of the NPC consideration of this site, the following evidence was considered: the 2020 Site Options and Assessment Report, the 2017 Landscape Character Assessment (LCA) for the Local Plan and the 2017 Landscape Capacity Assessment the Four Towns.
- 15.26. The Environmental Report states that landscape is a key issue for this current assessment, with an overriding consideration being the location of Highlands Farm North within the Chilterns AONB. There are views of the site from Greys Road and two footpaths that link Henley to the Chiltern Way; however, the land is notably flat, and there is understood to be good potential to mitigate impacts through masterplanning, screening and landscaping.
- 15.27. The Site Assessment produced by AECOM was the starting point for the NPC's considerations. AECOM concluded that the site had no major constraints and the site would be suitable for allocation. The assessment states that the impact on the AONB would usually be considered however, given recent construction, development on 853a should not adversely impact the AONB.
- 15.28. The site was then subject to additional site assessment criteria by the NPC, as set out in the Baseline Report, and this included an assessment of the landscape impact. It was recognised that the AONB designation is a constraint to growth at Highlands Farm Northern Field.
- 15.29. It was noted by the NPC that the site consists of individual fields which are contained by hedgerows and includes a tree belt to the north which provides screening to Greys Road, with more open boundaries along the western side of the site. It was considered that although the site is located within the AONB, that it is not prominent within the wider landscape and the existing development on the allocation Site M influences this along with the mature trees and hedgerows, lowering the susceptibility of the site due to the existing man-made influences. The area of land between Greys Road and Highlands Lane at the front west of the site would also not be developed.
- 15.30. It was considered that the SODC [Landscape Capacity Assessment](#) (2017) serves to indicate limited landscape sensitivity, and there will be good potential to take steps at the

development management stage to mitigate landscape impacts, guided by policy set out in the Revised JHHNP.

- 15.31. It was important that the site be designed appropriately and that a full detailed landscape and visual assessment be required as part of development of this site. The site allocation policy (Policy DS7) has been written to incorporate these requirements, including requiring a design brief for the site to demonstrate how development “incorporates and reinforces or re-provides the existing landscaping, green infrastructure and biodiversity features, particularly along the sites northern, southern and western boundary edges” and “responds to the site’s environmental and landscape context, including the AONB and visibility from the opposite side of the valley”. Furthermore, development is expected to ensure that it “conserves and where possible enhances the landscape and scenic beauty of the AONB”, including through the undertaking of a Landscape and Visual Impact Assessment.**
- 15.32. In summary, the site is clearly sensitive on account of being in the AONB. However, it seems apparent that, whilst in the AONB, the site is relatively unconstrained in the context of the Henley settlement edge, given the flat topography, adjacent built form and screening vegetation, and the adjacent small field to the northwest. Furthermore, it seems that there are limited, and potentially very limited, longer distance views across the site to or from the Harpsden Valley.**
- 15.33. We are in a position whereby the only alternative to the preferred growth scenario, as set out in the submission plan, is a scenario that is judged to perform worse on balance, having considered the full range of plan objectives and wider sustainability objectives. It is because there is no better performing alternative scenario and that public benefits exist, that the NPC support a major development in the AONB.**
- 15.34. We would be open to revisiting the matter of the planning balance, in light of further detailed evidence on the landscape constraint, but it is difficult to foresee how this might lead to a conclusion that an alternative scenario is in fact preferable.**
- 15.35. Any such work to revisit the planning balance would also need to account for the latest detailed proposals in respect of uses onsite / planning gain as well as masterplanning, landscaping and design measures aimed at mitigating landscape impacts.**
- 15.36. The intent for a landscape led design could be more effectively presented with the proposed revised policy wording as follows: *n) They are landscape-led and are appropriate for their location within the setting of the Chilterns AONB. All proposals should demonstrate that they have addressed site layout, design, orientation, height, bulk and scale of structures and buildings. In addition, careful consideration should be given to the use of colours, materials and the reflectiveness of surfaces in relation to the proximity of the site to the AONB. Careful consideration should be given to the use of street lights and other forms of external illumination to safeguard the dark night skies of the AONB*’ and the following wording could be included within the supporting text *‘It is important that proposed developments are landscape-led. The approach taken should be set out in the associated Design and Access Statement or a wider Planning Statement. In addition, proposals will be expected to have been tested through a full Landscape and Visual Impact Assessment which***

include photomontages showing the relationship of the development to the AONB in general.

c) Local Plan

See response below.

Is the third point still relevant now that the South Oxfordshire Local Plan has been adopted?

15.37. Since the adoption of the South Oxfordshire Local Plan 2035 of 10 December 2020 references to superseded documents such as the South Oxfordshire Local Plan 2011 or the Core Strategy 2027 have become out of date.

15.38. We consider that the site selection process, including the site assessment conclusions for this site, are in accordance with the adopted South Oxfordshire Local Plan 2035 as a whole and in particular with strategic policies addressing environmental constraints.

15.39. Notably, Policy ENV1: Landscape and Countryside in the SODC Local Plan 2035 which sets out:

15.40. 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;

- The scale and extent of the site has been limited to reflect the location within the AONB, the amount of housing has been limited to 110 homes and employment to 1 hectare to ensure that the development would respond to sensitivity to the area. It will also allow sufficient space for internal open space, tree planting and landscape buffers.**
- The development would be sensitively located on the site with a landscape buffer along the northern and western boundaries and a strip of land being left on the northwestern boundary.**
- Specific design brief requirements are included in the policy wording to emphasise the importance of development conserving and where possible enhancing the landscape and scenic beauty of the AONB and ensuring that development responds to the site's environmental and landscape context, including the AONB.**

15.41. Development in an AONB will only be permitted where it is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB;

- The site would also bring forward employment public benefits, due to the provision of 1 hectare of employment land, including the relocation of the Chiltern Centre and freeing up the existing site for housing.**
- The provision of open space, planting and GI opportunities would help to link green corridors to existing development and the surrounding area, improving environmental wellbeing and benefits.**

15.42. Major development in an AONB will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest;

- **It is considered that the development would deliver a range of benefits including a large amount of affordable housing, the relocation of the Chiltern Centre, employment and community uses. The need for affordable homes is demonstrated in the 2020 Henley and Harpsden Housing Needs Assessment. The Local Plan makes it clear that the NP should seek to meet demonstrable local affordable housing needs, even where this would result in housing provision in excess of the outstanding requirement.**

15.43. Development proposals that could affect the special qualities of an AONB (including the setting of an AONB) either individually or in combination with other developments, should be accompanied by a proportionate Landscape and Visual Impact Assessment.

- **The policy wording for this site sets out that a Landscape and Visual Impact Assessment will be required at the planning application stage to assess the impact of the proposed development on the landscape.**

Various components of the Plan comment about the relationship between the development of Site M (to the immediate south) and its former uses. They also relate to the rationale behind the allocation of Site M in the made Plan. Please can the Town Council provide information about the nature of the former employment and agricultural uses that existed on Site M at that time?

16.1. Site M was a brownfield site and consisted of a variety of business and light industrial uses, together with an area of recreation land. This included larger industrial units and smaller office buildings with a large area used for football pitches. The site also contained large yard areas used for storage of materials and equipment.

Site C

I acknowledge proposed housing site at Gillotts School in the Plan remains unchanged from the 'made' Plan. Nevertheless, I can see in the second addendum to the AECOM Site Assessments that there is a degree of commentary both on the proposed access arrangements to the site, and on the environmental implications of those arrangements.

Has any further assessment work been undertaken on the access issue since that report was produced in August 2021?

17.1. Access was considered as part of the site assessment process, as part of the initial site assessment and the additional assessment by the Working Group.

17.2. Oxfordshire County Council were consulted following the site assessment produced by AECOM in Summer 2021 and didn't raise concerns over the access to the site.

17.3. It is considered that access to the site could be achieved, the Town Council owns land that could be used as access. The Landowner has confirmed that the access issue is close to being resolved as shown in Appendix C.

17.4. As the main owner of land to be used for accessing the site at Gillotts School , Henley Town Council has engaged in positive discussions regarding its provision. Final details of the land disposal remain for ratification by the Council.

Representations

Does the Town Council wish to comment on any of the representations made to the Plan?

In particular, does it wish to comment on the representations made by:

- Chilterns Conservation Board (9);
- Thames Developments Group Limited (11)
- Gillotts School (12)
- Blockwork (13)
- South Oxfordshire District Council (14)
- B&M Care (19)
- Taylor Wimpey (21)
- Westbourne homes & Debrecq (Crossways) (22) – Tony Wright.
- Borlase Family (23)
- Crest Nicholson Chiltern (24)
- Bloor Homes (25)
- Oxfordshire County Council (27)
- Knole Homes (28)
- South Oxfordshire District Council Property (29)

[The numbers in brackets are the reference numbers in the District Council's schedule of representations].

Response shown in table below:

Respondent	Policy	Response
<p>Respondent Number: 9 Chiltern Conservation Board</p>	<p>Site options assessment</p>	<p>The Chilterns Conservation Board (CCB) raise concerns with the site selection process and, in particular, whether due account has been taken of the issues and constraints associated with the largest of the allocations in the submission plan, namely Site M1: Highlands Farm.</p> <p>As an initial point, it is important to note that the site options assessment (SOA) was undertaken as an early step in the process. It’s aim was to differentiate between the available site options on a three point (red-amber-green) scale, as opposed to selecting preferred sites for allocation.</p> <p>An overview of the SOA is presented across pages 9 – 11 of the Environmental Report. Nine sites were assigned a green rating by the SOA, namely:</p> <ul style="list-style-type: none"> • five sites that the Environmental Report described as “relatively easy wins”, i.e. sites where there is a very clear case for allocation / limited argument for non-allocation; • a further site described within the Environmental Report as “performing very strongly”; • two sites on the edge of Lower Shiplake identified as “giv[ing] rise to concerns”; and • Highlands Farm (N.B. Highlands Farm is <i>not</i> describe as an ‘easy win’). <p>The detailed reasons for assigning Highlands Farm a green rating are set out in the 2020 version of the SOA, which again serves to highlight that the SOA was an early step in the process. Not only was SEA work undertaken subsequent to the SOA, but also the Town Council ran a consultation on site options in 2021, the findings of which are set out in a Consultation Report.</p> <p>A key reason given is that the site is “within the built up area”, once account is taken of development to the south, namely the Highlands Farm scheme allocated through the Henley Neighbourhood Plan (2016).</p>

	<p>Developing reasonable alternatives</p>	<p>Section 5 of the Environmental Report explains a process of developing growth scenarios for the neighbourhood plan in 2021. The SOA was a key input, but strategic factors also fed in, including the residual housing requirement from the Local Plan.</p> <p>Paragraph 5.26 explains that one scenario is to meet and exceed ('buffer') this requirement by allocating Highlands Farm, and this scenario is taken forward for assessment as Scenario 1.</p> <p>Any other scenario must involve a package of smaller sites, and attention immediately falls on two green-rated sites in Harpsden; however, the combined capacity of these sites (31 homes) falls short of what is required (34 homes).</p> <p>Hence there is a discussion of alternative ways to meet the residual shortfall of (at least) 3 homes. One option is to allocate one or more of the four amber-rated sites in Harpsden, but this scenario is ruled-out as 'unreasonable' (paragraph 5.27).</p> <p>The other option is to support a higher density scheme at 'Site C', which is the Gillotts School site allocated for 50 homes in the made neighbourhood plan. This is taken forward as Scenario 2.</p>
	<p>Assessing reasonable alternatives</p>	<p>The site selection process has robustly explored all available options including those in and outside of the AONB.</p> <p>The assessment of the two reasonable growth scenarios for the neighbourhood plan is presented across pages 14-17 of the Environmental Report, and serves to draw out a good range of the issues and opportunities associated with Scenario 1, both in an absolute sense and relative to Scenario 2.</p> <p>Landscape sensitivities associated with Scenario 1 are clearly captured, as well as issues around proximity to the town centre (see discussion under 'air quality'). However, with regards to matters relating to car dependency, accessibility and wider 'population and communities' objectives (including, and notably, affordable housing), Scenario 1 is judged to be preferable to Scenario 2.</p>

	<p>Selecting the preferred scenario</p>	<p>The NPC’s reasons for supporting Scenario 1 and rejecting Scenario 2 are set out on page 18 of the Environmental Report. It is repeated in full here:</p> <p>“The preferred approach is to take forward Scenario 1 as the basis for the Revised JHHNP. This approach is considered to broadly align with the findings of the assessment, which finds Scenario 1 to perform well in terms of the majority of key sustainability issues, both in absolute terms and relative terms.</p> <p>It is recognised that the Area of Outstanding Natural Beauty (AONB) designation is a constraint to growth at Highlands Farm Northern Field. However, the SODC Landscape Capacity Assessment (2017) serves to indicate limited landscape sensitivity, and there will be good potential to take steps at the development management stage to mitigate landscape impacts, guided by policy set out in the Revised JHHNP.</p> <p>With regards to Scenario 2, the assessment highlights a range of drawbacks, including on the basis that growth would be directed to the edge of Lower Shiplake rather than the edge of Henley. It is recognised that further scenarios could feasibly be explored that would involve focusing growth solely at the edge of Henley; however, all such scenarios are judged to be ‘unreasonable’ on the basis of the discussion set out in Section 5 of this report.</p> <p>The process of defining and assessing growth scenarios serves to highlight that there are no easy choices, in respect of planning for growth at Henley. Nonetheless there is a need to make a choice, and the Committee views Scenario 1 as best representing sustainable development on balance. Importantly, the preferred approach will deliver benefits to the Neighbourhood Area and meet the requirements set out in the Local Plan.”</p> <p>The NPC stands by this statement, but recognises that the evidence provided by SODC Landscape Capacity Assessment (2017) is more accurately described as indicating <i>relatively</i> limited landscape sensitivity, specifically limited sensitivity in the context of Henley urban edge.</p>
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	<p>Conclusions</p>	<p>The NPC recognises the position of the CCB. However, the NPC is in a position whereby the only alternative to the preferred growth scenario, as set out in the submission plan, is a scenario that is judged to perform worse on balance, having considered the full range of plan objectives and wider sustainability objectives. It is because there is no better performing alternative scenario that exceptional circumstances exist to support a major development in the AONB.</p> <p>The NPC has given great weight to the AONB constraint, but the other options available are not considered to be acceptable. We consider there are exceptional circumstances and that the development proposed on this site is in the public interest.</p> <p>The site is clearly very sensitive on account of being in the AONB. However, it seems apparent that, whilst in the AONB, the site is relatively unconstrained in the context of the Henley settlement edge, given the flat topography, adjacent built form and screening vegetation, and the adjacent small field to the northwest. Furthermore, it seems that there are limited, and potentially very limited longer distance views across the site to or from the Harpsden Valley.</p> <p>The NPC would be open to revisiting the matter of the planning balance, in light of further detailed evidence on the landscape constraint, but it is difficult to foresee how this might lead to a conclusion that an alternative scenario is in fact preferable.</p> <p>Any such work to revisit the planning balance would also need to account for the latest detailed proposals in respect of uses onsite / planning gain as well as masterplanning, landscaping and design measures aimed at mitigating landscape impacts.</p> <p>The intent for a landscape led design could be more effectively presented with the proposed revised policy wording as set out in paragraph 15.36.</p>
<p>Respondent Number: 11 Thames Properties</p>	<p>Policy ENV3: Trees</p>	<p>The Forestry and Landscape Officer comments received welcome the requirement for new tree planting and suggest amending the wording to state 'wherever possible a minimum of three trees should be planted for each dwelling'.</p>
	<p>Policy T4: EV Charging Points</p>	<p>SODC are happy with the policy as it stands.</p>

	Policy DS2: Land West of Fair Mile (Site A1)	It is important that development responds to the heritage context so this wording should remain. With regards to the low density of development, the policy wording is permissive.
Respondent Number: 12 Gillotts School	Designation of Local Green Space	The reasons for the land being proposed for designation are: * adjacent to Peppard Lane which is a public bridleway and footpath. This is used extensively by local residents from all over Henley and by visiting walkers. It provides an amenity by screening the school and its activities and it enhances the rural nature of Peppard Lane. * Because of the site's nature as a broadleaf woodland habitat it provides a haven for wildlife including funghi, insects, small mammals and birds and is designated as such by DEFRA * TPOs on major trees would be inadequate in protecting the valuable habitat afforded by the undercroft and scrub on the site.
	Number of houses	This to ensure that the character of the area, and plenty of room is left for landscaping and mitigating any impacts especially viewed from the South.
Respondent Number: 13 Blockwork	TCE3: Hotel and Bed Space	The evidence to support this policy is included within the Baseline Report starting on page 112, this demonstrates that hotel and bed spaces have been provided since the needs assessment was produced in 2014. Furthermore, Local Plan Policy EMP11 support proposals for hotels within the built-up areas of towns and there is no requirement within the Local Plan for the NDP to provide any additional spaces. Agree to update the figure reference at paragraph 21.30 to refer to Figure 24.
Respondent Number: 19 B&M Care	C2 use on Site X	OCC cannot show that there is a need for C2 Care Homes at this stage, in order to be allocated this would need to be demonstrated and this would be a material consideration when dealing with a planning application. Furthermore, the adopted Local Plan includes permissive policies. The Committee therefore disagree that this policy should be allocated for this use.

		<p>The site has been refused planning permission for a Care Home under applications P17/S0526/FUL(also dismissed on appeal APP/Q3115/W/18/3203476) and 19/S2486/FUL.</p> <p>This site is one of the most sustainable sites within the Plan and the Committee would like to see this coming forward for housing. The 2020 housing needs assessment demonstrates that there is a need for houses including affordable houses.</p>
<p>Respondent Number: 21 Taylor Wimpey</p>	<p>Meeting Housing Needs</p>	<p>SODC Local Plan Policy H3: Housing in the Towns of Henley-on-Thames requires the NDP (Neighbourhood Development Plan) to provide the minimum outstanding requirement. This does not state that existing completions and commitments should be allocated and therefore we do not propose to allocate this site in the Plan.</p> <p>Disagree that changes should be made to the 2020 site assessment document. The site assessment summary table (pg32) clarifies why the site is not appropriate to allocate. We can agree to remove Site 1036 from paragraph 16.8 of the baseline report and state in a separate sentence that Site 1036 'not appropriate to allocate as it is under construction'.</p>
	<p>Policy ENV2: Biodiversity</p>	<p>Disagree, the policy doesn't require development to deliver green walls and green roofs this is set out as a suggestion of what could be provided. The policy wording is clear that development proposals should as appropriate to their nature and scale meet the requirements set out.</p>
	<p>Policy ENV3: Trees</p>	<p>The proposed wording is unnecessary, development proposals will need to be subject to wider policies within the Development Plan and this is not required to be added to each policy.</p> <p>We could clarify that the three trees should be new and not replacements.</p>
	<p>Policy H2: Affordable Housing</p>	<p>Disagree with the proposed wording.</p>
	<p>Policy T1: Impact of Development on the Transport Network</p>	<p>It is not considered that this would be duplication of Policy ENV1.</p>

	Policy T4: EV Charging Points	Agree to amend Policy T4: EV Charging Points to state: The management of the charging points, including the mechanism/procedure for taking payments, will be the responsibility of the developer/occupier or other management option.
Respondent Number: 22 Westbourne homes & Debrecq (Crossways)	Overall Comment	<p>The site has been refused planning permission for 11 dwellings by SODC on 7 April 2022 (P21/S4616/FUL).</p> <p>The reasons for refusal as included in the decision notice were:</p> <ol style="list-style-type: none"> 1. The proposed development fails to accord with the strategy for new housing set out in the development plan. The application site is located outside of the settlement of Lower Shiplake, is not a site allocated for development, and would not constitute infill development as identified in Policies H8 and H16 of the South Oxfordshire Local Plan 2035. As such, it does not fall within one of the categories where development is acceptable and is contrary to policies STRAT1 and H1 of the South Oxfordshire Local Plan 2035. 2. The proposed development would result in the loss of the role of the site as a transitional space between the settlement of Lower Shiplake to the east and open countryside to the west. The proposed development would encroach into undeveloped land and would diminish the open character of the site and its importance in the setting of the settlement of Lower Shiplake. The scale and massing of the market dwellings detracts from the appearance and character of the local area and do not provide a form of quality architecture. The proposed development is contrary to policies DES1 and ENV1 of the South Oxfordshire Local Plan and the South Oxfordshire Design Guide. 3. The proposal does not provide a mix of market dwellings to meet the housing need, including smaller dwellings, as set out in the Oxfordshire Strategic Housing Market Assessment 2014. The proposed development is therefore contrary to paragraph 8 of the National Planning Policy Framework and policies H11 and DES1 of the South Oxfordshire Local Plan 2035. 4. In the absence of a completed Section 106 legal agreement, the proposal fails to secure affordable housing to meet the needs of the district. As such, the development is contrary policies H9 and H11 of the South Oxfordshire Local Plan 2035. 5. In the absence of a completed Section 106 legal agreement, the proposal fails to secure infrastructure necessary to meet the needs of the development. As

		such, the development is contrary to policies INF1 and CF5 of the South Oxfordshire Local Plan 2035.
	Suitability of Highlands Farm	See response to Site M1 in main Clarification Note. The NPC disagree that a Visual Impact Assessment would be required at this stage.
	Strategy	<p>The overall strategy for the District as detailed in Local Plan Policy STRAT1 sets out the strategy for the hierarchy of settlements, with the main focus of development being the towns including Henley-on-Thames. Although it is acknowledged that Lower Shiplake is classified as a smaller village allowing for limited number of houses.</p> <p>“Smaller Villages, as defined in the settlement hierarchy (Appendix 7), have no defined requirement to contribute towards delivering additional housing (beyond windfall and infill development) to meet the overall housing requirement of South Oxfordshire. There is a sufficient supply of housing from strategic allocations and from existing planning permissions, which means that the less sustainable settlements will not be required to offset the housing requirement.”</p> <p>This clarifies that there is no ‘expectation’ for the Neighbourhood Plan to allocate in this area. The Local Plan does not expect the Neighbourhood Plan to allocate in smaller or other villages.</p> <p>The strategy for the NDP and Local Plan is to focus growth towards Henley and the services/facilities available.</p> <p>The Henley and Harpsden Neighbourhood Plan has been positively prepared following extensive public consultation. It should be noted that public consultation throughout this process has identified that local residents are not in favour of further major residential development at this site and others in this location within the Plan period.</p>

		<p>The Plan allocates for more than what is required by the Local Plan (Policy H3) and allows for further housing development through the development management policies.</p>
	<p>Commitments and Completions.</p>	<p>The majority of these completions/commitments are for 1 or 2 dwellings at the most (including some change of use).</p> <p>Two sites in this general location that are included within completions/ commitments are Thames Farm, Reading Road, Shiplake, RG9 3PH P16/S0970/O and Wyevale Country Gardens Reading Road Harpsden RG9 4AE P18/S0951/O.</p> <p>Wyevale Garden Centre: This site is allocated in the existing 2016 JHHNP for employment use, specifically B1 and B2 business activities and D1 activities where these can be shown to make a demonstrable contribution to the local economy (Policy E2). However, application P18/S0951/O was for a housing development with 0.2ha of employment. It was found that, whilst the proposed development was contrary to the Development Plan, evidence had been submitted to demonstrate that uses as prescribed Policy E2 were not financially viable. In such circumstances the NPPF stated that applications for alternative uses should be supported. It was recognised that the site was previously developed land its derelict appearance detracted from the approach to Lower Shiplake.</p> <p>Thames Farm: Particular reference is made to the Thames Farm site to the north, which received outline planning permission on appeal in 2017. The appeal was granted because the Inspector found that South Oxfordshire District Council could not demonstrate the requisite three year land supply.</p> <p>This is not a location that is suitable for major development or an allocation.</p>

	<p>Infill Development</p>	<p>The officer report for the refused planning permission P20/S2103/FUL and P21/S4616/FUL states that they consider the settlement of Lower Shiplake to be located on the east side of the A4155, around the railway station and indicates that this location is outside the settlement. The Inspector for the Thames Farm site noted that that site was “in the countryside and lies outside of the built-up area of Lower Shiplake.” And the planning officer for planning application P20/S2103/FUL contended that this also applied for this site.</p> <p>The site promoter contend that the development would be infill under SOLP Policy H16.</p> <p>The NPC do not agree that this would comply with either criterion of policy H16; it would not constitute the filling of a small gap in an otherwise continuous built-up frontage; The site is not closely surrounded by buildings nor is there is a continuous built up frontage and it is considered to be outside of the settlement.</p>
<p>Respondent Number: 23 Borlase Family</p>	<p>Deliverability of Allocations</p>	<p>See comments on deliverability of sites included within the Plan in Modification Statement.</p>
	<p>Outcome of July Public Consultation.</p>	<p>The Working Group considered all of the evidence available, including the response of the public consultation to determine the most suitable sites for allocation.</p>
	<p>Suitability of Highlands Farm</p>	<p>See response to Site M1 in main Clarification Note.</p>
	<p>Landscape Impact</p>	<p>Landscape was a consideration in the Site Assessment produced by AECOM.</p>
	<p>Suitability of Site</p>	<p>This site is not considered to be suitable for allocation; as set out in the Baseline Report. Furthermore, it does not provide any additional public benefits and it is considered not to be in accordance with the SODC 2011- 2035 Local Plan.</p>

<p>Respondent Number: 24 Crest Nicholson Chiltern</p>	<p>Policy DS7: Northern Field at Highlands Farm (Site M1) including Supporting Text</p>	<p>Acknowledge that the Chilterns Centre, Community Centre and employment facilities uses would fall under the definition of employment uses as set out in the glossary of the Local Plan. Agree to the following amendment: The Highlands Farm site of approximately 7ha (as shown on site location diagram) is allocated for: a) Around 110 new homes; b) 1 ha of flexible commercial and community employment land including: (i) relocation of the Chilterns Centre; (ii) relocation and redesign of the community centre and the employment facilities from existing allocation site M, Highlands Farm; c) provision of 20 no community led housing units; and d) Publicly accessible open space. However, the NPC disagree that the provision of community led housing would constitute an employment use and therefore should not be included within the 1 hectare of employment /commercial land. The remaining policy wording should remain.</p>
	<p>POLICY H1: Design Brief including Supporting Text</p>	<p>Agree with the removal of 'on the submission of a planning application'. Do not agree with specifying four weeks so current wording should remain.</p>
<p>Respondent Number: 25 Bloor Homes</p>	<p>The preferred sites and housing supply</p>	<p>The allocated sites would be sufficient to meet the outstanding housing requirement. This site is not considered to be suitable for development and therefore has not been proposed for allocation.</p>
	<p>Suitability of Site</p>	<p>This site is not considered to be suitable for allocation; It is not located within the existing built-up area of the town, and it would have unacceptable impact on important local views and lead to the coalescence of Henley and Harpsden. In addition to the conclusions set out in the AECOM assessment. The site would not bring forward any additional public benefits. Furthermore, there have been strong concerns raised by the local community during previous public consultations.</p>

<p>Respondent Number: 27 Oxfordshire County Council</p>	<p>Local Green Spaces designations</p>	<p>Site 19 The bridleway is not included. The northern boundary of the proposed local green space designation is the boundary between land owned by Gillotts School and the bridleway known as Peppard Lane.</p> <p>Site 21 No OCC owned land is included in proposed local green space 21.</p> <p>Agree - updated maps will be provided</p>
	<p>Site Specific Comments - Extra Care Housing</p>	<p>OCC cannot show that there is a need for extra care accommodation in this location at this stage. In order to be allocated, this would need to be demonstrated and this would be a material consideration when dealing with a planning application. Furthermore the adopted Local Plan includes a permissive policy (Policy H13 : Specialist Housing for Older People).</p> <p>The Committee therefore disagree that this policy should be amended to provide a flexible approach. It is important that residential development is provided on this site which has good access to facilities and services within Henley.</p>
	<p>Archaeology Comments</p>	<p>The NPC would be happy with the proposed policy in principle.</p>
<p>Respondent Number: 28 Knole Homes</p>	<p>Policy DS10 Land at Newtown Road.</p>	<p>We believe it is still relevant to protect employment on the specified sites in order to retain local employment and services in Henley. Whilst we agree with the Local Authority that this site could be used for Class E use, the Committee would not like to see this use changed to residential.</p> <p>The NDA only contains two main employment land areas, and we cannot afford to lose any more. Employment providing a strong and competitive economy is an important aspect of sustainable development (NPPF Paragraph 8).</p>

Joint Henley and Harpsden Neighbourhood Plan Committee's Response to Examiner's Clarification Note

Respondent Number: 29 South Oxfordshire District Council Property	Policy DS1, Proposed Allocations Policy DS2, Land West of Fair Mile Policy ES4, Empstead Works/Stuart Turner site (Site E)	Comments noted, no changes required.
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The District Council proposes a series of refinements to several policies. Does the Town Council have any comments on the suggested refinements?

Respondent Number: 14 South Oxfordshire District Council	Policy ENV1: Air Quality	Agree with minor policy wording amendments.
	Policy ENV3: Trees	Agree to the two suggestions by the Forestry Officer. Agrees to the suggestions of rewording by the Landscape Officer and suggestion of the inclusion of community orchard. We are not happy with the weakening of the wording in the last sentence of ENV3 part B.
	Policy SD3: Local Character	Agree with changes to policy wording. Agree to update glossary.
	Paragraph 7.4	Agree with minor policy wording amendments.
	Policy H3: Housing Type and Mix	Agree with minor policy wording amendments.
	Policy E2: Henley Town Centre	Agree with minor policy wording amendment.
	Policy E3: Market place Hub	Update wording to refer to E1 and update supporting text to justify.
	Modification statement Policy E1	Remove reference in Modification Statement.
	Policy T2: Active Travel	Label with numbers rather than letters. Agree with the suggested amendment to Point B Agree to delete point c under point B.
	Policy T3: Easing Congestion	Agree with minor policy wording amendment.
	Paragraph 9.59	Agree with deletion of paragraph.
	Site Allocations	<p>The NPC consider that the density proposed for the site allocations to be appropriate, the reasons for each are set out below:</p> <p>Policy DS2: Land West of Fair Mile (Site A1): The environment, townscape and heritage constraints have all informed the density on this site, including the Conservation Area and two Listed Buildings to the eastern edge. There needs to be sufficient space to manage the existing green infrastructure including reinforcing planting along the site's frontage. As stated in the supporting text for this policy, a sensitive transition needs to be made between the lower density properties to the north and existing urban edge to the south.</p> <p>Policy DS3: Gillotts school field (Site C): the landscape and environment constraints have informed the density of this site. It takes into account the existing trees, particularly along the southern edge, which are expected to play an important role in screening this from the south. It</p>

		<p>also reflects the existing relatively low density development pattern found in this part of the town, being around 20 dwellings per hectare along Blandy Road.</p> <p>Policy DS7: Northern Field at Highlands Farm (Site M1): environmental constraints have informed the density of this site, and to ensure that sufficient area is available for other uses including employment and community led housing. The landscape sensitivity of the site has influenced the density on this site; sufficient space should be made available for internal open space, tree planting and a landscape buffer along the northern and western boundaries. The operation of nationally agreed minimum densities is not always appropriate and in order to deliver wider benefits and the conservation of the special qualities of the AONB it may be better to operate to lower, maximum, density levels. It is noted that Local Plan Policy STRAT5 states that density of development should be informed by local circumstances and site constraints including heritage assets and important landscape, habitats and townscape. It is considered that the proposed density for each site would conform with this policy.</p>
	<p>Policy DS10: Land at Newtown Road (Site AD)</p>	<p>The NPC are happy with the wording to amended to refer to Class E.</p>