Shiplake Neighbourhood Plan - publicity period

Response 1

Respondent Details

Information	
Contact Details	
Q1. Are you completing this form as an:	
Individual	

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

More than happy to support the Shiplake Parish Neighbourhood Plan and hope that it will allow the three villages to minimise further building development in the area.

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.

None

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 Shiplake Neighbourhood Plan:

No, I do not request a public examination



Respondent Details



Organisation

Your comments

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The Property Department have no specific comments to make, as South Oxfordshire do not hold any property assets within the designated area of the Neighbourhood Plan.

Public examination

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No, I do not request a public examination

Title	Mr
Name	David Ashton
Job title (if relevant)	Property Surveyor
Organisation (if relevant)	Property Team, Development and Regeneration
Organisation representing (if relevant)	South Oxfordshire District Council
Address line 1	135 Eastern Avenue
Address line 2	Milton Park,
Address line 3	Milton OX14 4SB
Postal town	-
Postcode	OX14 4SB
Telephone number	07793 586365
Email address	david.ashton@southandvale.gov.uk

Respondent Details



Individual

Your comments

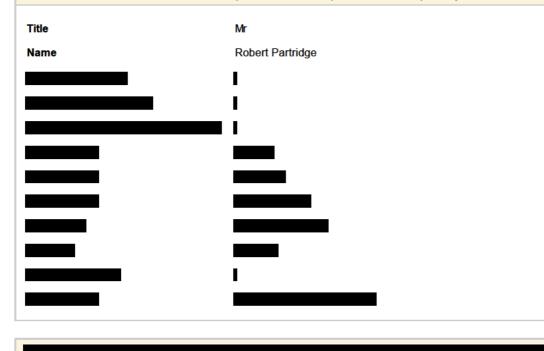
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The plan has my suuport.

Public examination

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No, I do not request a public examination



Respondent Details



Individual

Your comments

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I support the plan.

Public examination

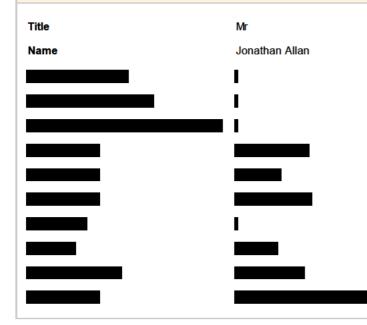
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Yes, I request a public examination

Public examination

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

Transparency.



Respondent Details

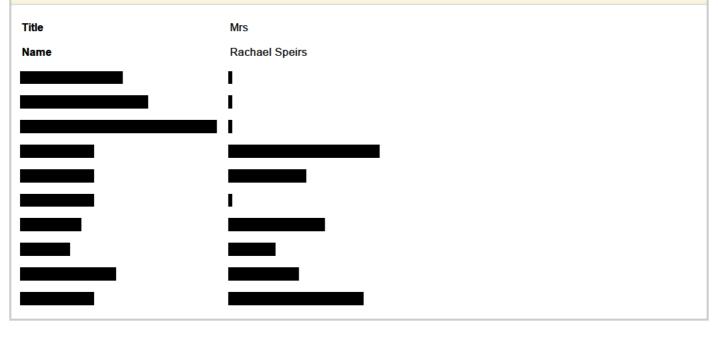
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Individual

Public examination

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No, I do not request a public examination

Your details and future contact preferences



Respondent Details



Individual

Your comments

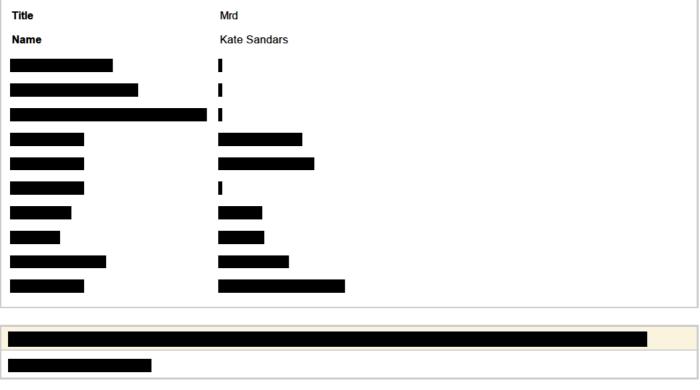
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I support the Shiplake Neighbourhood Plan

Public examination

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No, I do not request a public examination





Respondent Details



Individual

Your comments

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I support the objectives and policies of the Shiplake villages Neighbourhood Plan

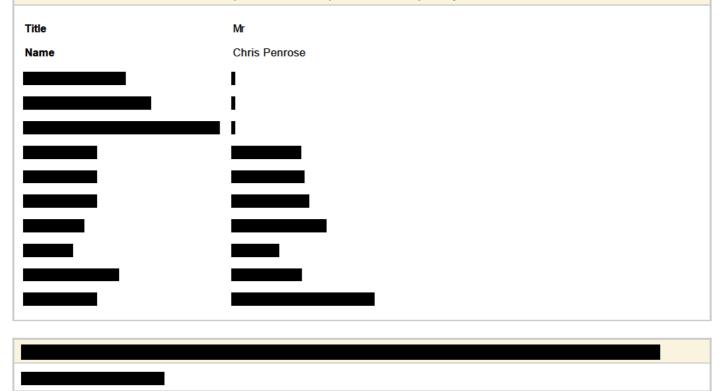
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The changes that I have recommended in past have been made to the current NP

Public examination

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No, I do not request a public examination



Respondent Details



Individual

Your comments

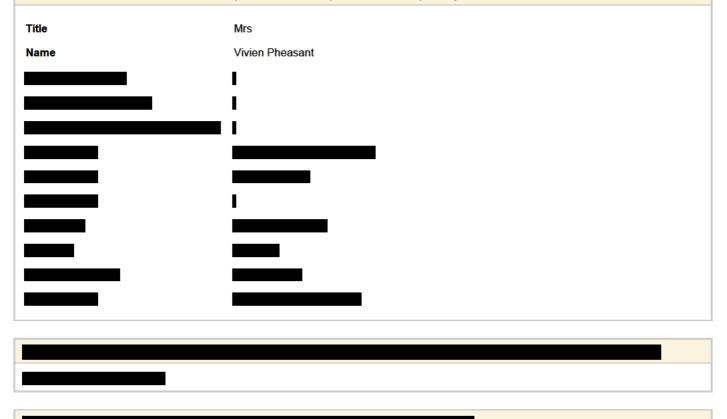
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The Neighbourhood Plan has been diligently developed taking account of residents' views, with the benefit of advice and guidance of consultants and SODC's planning officers, to ensure it is consistent with NPPF requirements and SODC's current Local Plan. Many thanks and much appreciation of the efforts of members of the Shiplake Neighbourhood Plan Group, Committee and Parish Council.

Public examination

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No, I do not request a public examination



Respondent Details

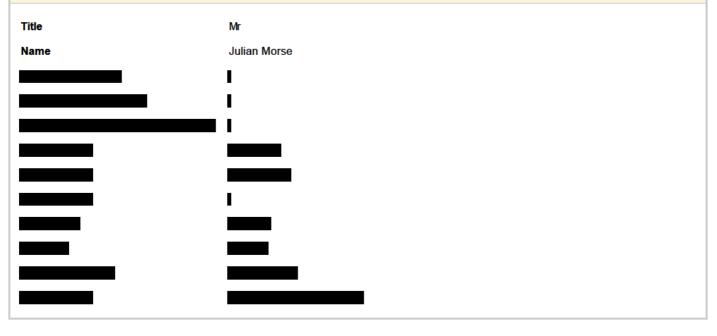
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Individual		

Public examination

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No, I do not request a public examination

Your details and future contact preferences





Respondent Details



Your comments

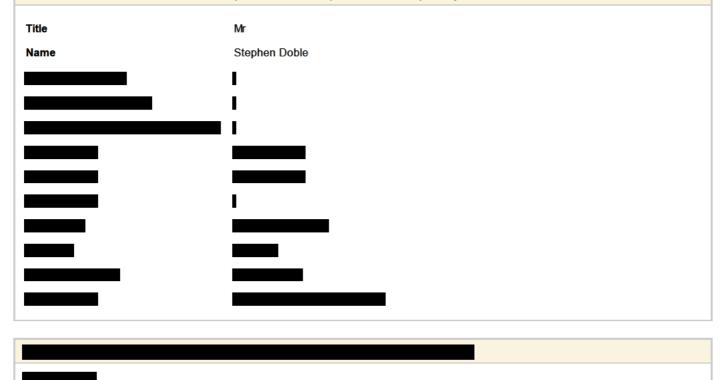
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I support the neighbourhood plan and I am grateful for all of the work that has been put in to it.

Public examination

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No, I do not request a public examination



Respondent Details



Your comments

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The latest incarnation of this plan has been produced/managed by a steering group of 9 people 7 of whom are parish councillors and only 2 are residents. There has been comparatively little public consultation/public input into the 'new' version of the draft plan or the general thrust of the document.

The main thrust of this document is that having received local planning permissions in respect of the designation of approx.. 220 new dwellings in the immediate vicinity of Shiplake Villages, that no more larger-scale developments should be permitted to take place within and around the environs of Shiplake Villages. This is a proposition that I wholeheartedly support

However, my primary concern with this document is its robustness in achieving that primary objective and the degree to which that will be a truly defensible position in the face of further applications that may come forwards.

If the plan content is not sufficient, or sufficiently robust to achieve that objective then it should be modified in order that it contains the necessary key policies and content to do so, and this should if necessary, include specific designation of sites that are considered suitable for small scale infill development.

Secondly, I am concerned that the document does not reflect the current uncertainty that exists over the future of Thames Farm, where there is some uncertainty as to the ground conditions. This relates to the suitability of the site for such a dense form of development given the need for large areas to be grouted to a depth of maybe 16m, and for most of the site to be subject to bro compaction treatment. The draft plan should recognise and acknowledge this uncertainty and provide the evidence to show that even if Thames Farm does ultimately have a reduced scale of development on it, then that would and should not provide reasons as to why there should be further development permitted within the parish boundaries.

It is hard to see how some of the stated objectives of the NP will be supported by the provisions and policies of the plan. In particular 4 (non-conforming uses) 6 (Improvement of Core Facilities) 7 (Enhancement of Village Centres). Moreover, Policy SV 17 looks to be overly prohibitive and does not provide positive encouragement or policies to improve the village centres.

The future of Thames Farm remains one of the most significant issues that require clarification around the neighbourhood, and it is important that our representatives are fully engaged in ensuring that this site is developed in a safe way and to a density that does not prejudice the community's drinking water or in a manner that will provide huge disruption through noise vibration dust dirt or vehicle movements, localised flooding or flash flooding or the translocation of flooding to other areas via any pumped drainage solution that increases the risk of flooding elsewhere. Whilst Thames Farm lies close to but outside of the parish boundaries, its impact on the parish and residents will be such that the parish council should pro-actively ensure that the site is developed safely and without overly negative impacts on the residents within the parish or elsewhere.

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.

See Above

Public examination

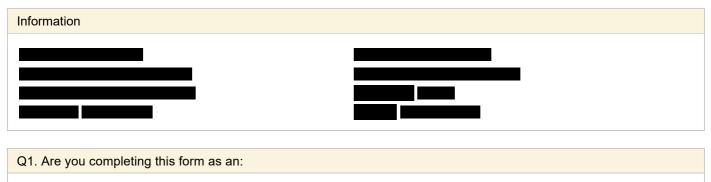
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No, I do not request a public examination

Your details and future contact preferences

Title	Mr
Name	Peter Boros
	1
	I
	I

Respondent Details



Individual

Your comments

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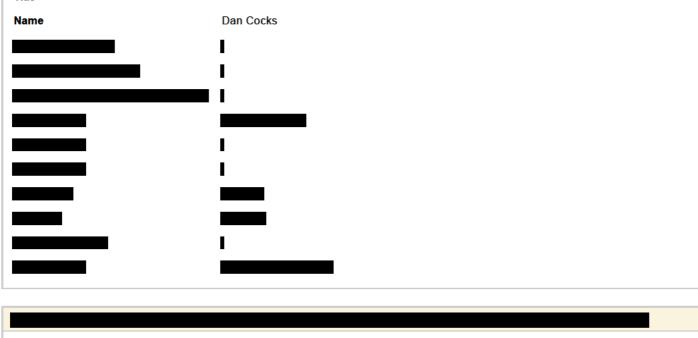
Supported.

Public examination

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No, I do not request a public examination

Title





Respondent Details

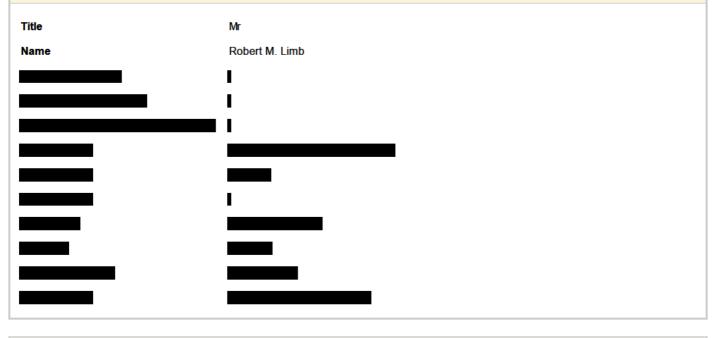
Information		
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Individual		

Public examination

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No, I do not request a public examination

Your details and future contact preferences





Respondent Details



Individual

Public examination

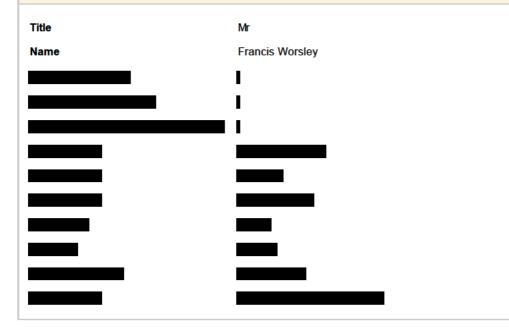
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Yes, I request a public examination

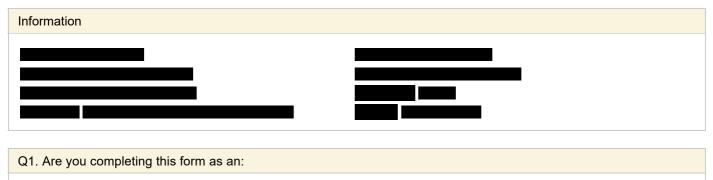
Public examination

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

Democratic process



Respondent Details



Individual

Your comments

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I wish to support the proposals in the Neighbourhood Plan.

Public examination

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Yes, I request a public examination

Public examination

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

To provide clarity to all involved



Respondent Details



Individual

Your comments

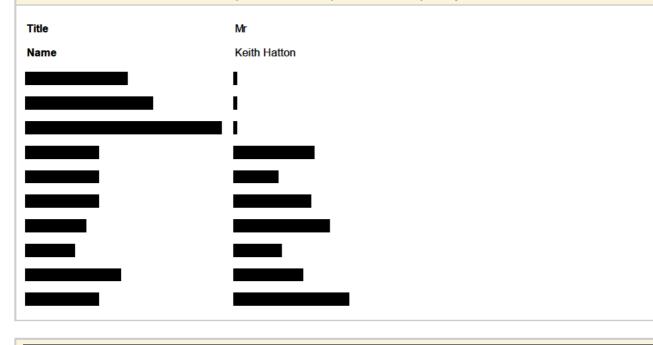
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I support the plan

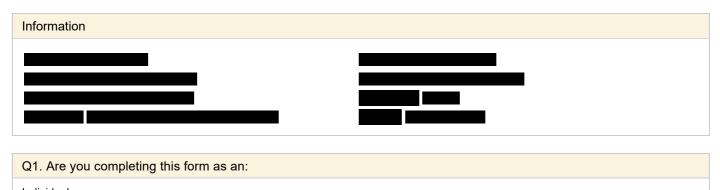
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No, I do not request a public examination



Respondent Details



Individual

Your comments

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I am in favour of the neighbourhood plan

Public examination

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Don't know



Respondent Details

Information	
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Individual	

Public examination

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No, I do not request a public examination

Your details and future contact preferences

Title	Mr
Name	M ke Cawthra
	1
	I
	I
	1
	1

Respondent Details



Individual

Your comments

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I completed the Questionnaire which fed into this Plan and still fully support it.

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.

SODC should ensure that theThames Farm mess is restored to it's original state and compensate Shiplake residents for the years of inconvenience and time wasted pointing out the obvious - this development should never have gone ahead without working through the details first - Pure Greed

Public examination

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No, I do not request a public examination



Respondent Details

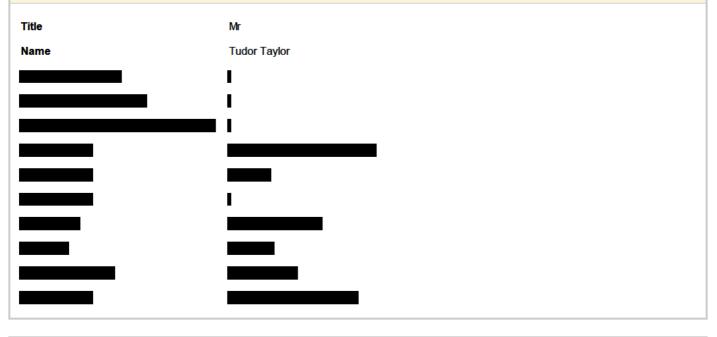
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No, I do not request a public examination

Your details and future contact preferences





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No, I do not request a public examination

Your details and future contact preferences

Title	Mrs
Name	Susan L Partridge
	1
	1

Respondent Details



Individual

Your comments

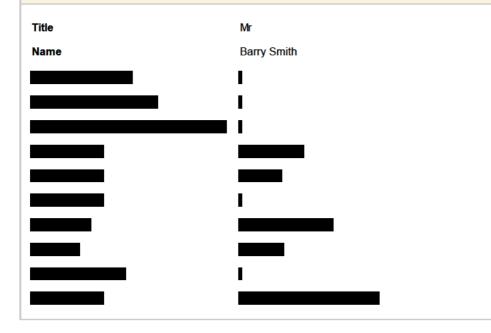
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I fully support the plan as submitted by the Shiplake Parish Council and would like to thank them for their excellent work and dedication to a long and difficult task.

Public examination

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No, I do not request a public examination



Respondent Details



Individual

Your comments

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I fully support the Neighbourhood Plan as drafted.

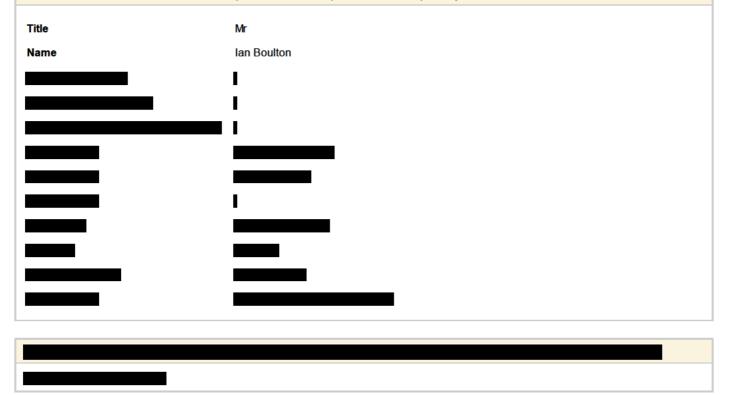
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Non-applicable

Public examination

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No, I do not request a public examination



Respondent Details



Individual

Your comments

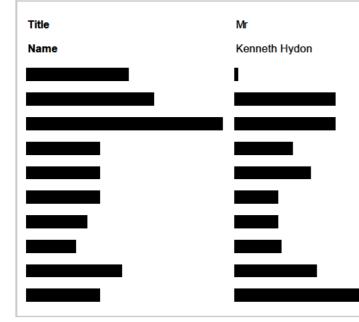
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I approve of the Plan and trust that the character of the village will be sustained when detailed planning applications are submitted.

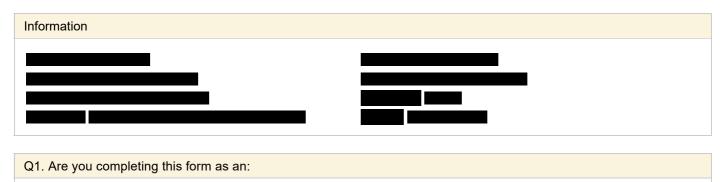
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No, I do not request a public examination



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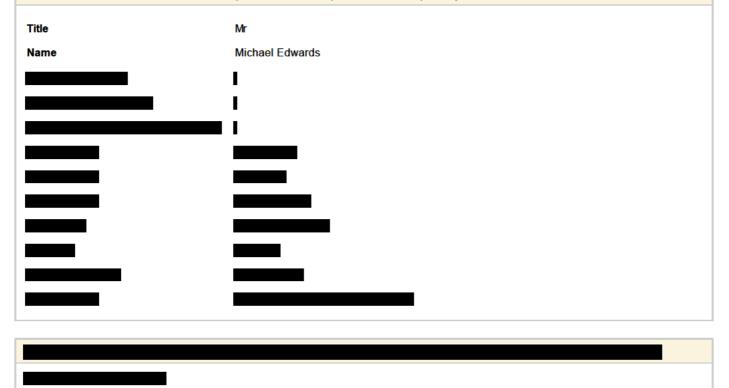
This is a very complete and well thought out document. The level of detail and thoughtfulness was beyond what I anticipated. I can only hope that its aims, along with those of South Oxfordshire Local Plan, are respected and adhered to with regard to future planning processes.

I hope the Plan is adopted in its entirety.

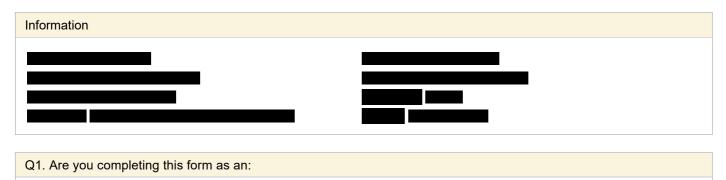
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No, I do not request a public examination



Respondent Details



Individual

Your comments

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I would like to support this proposed Neighbourhood Plan.

I agree with the Vision Statement and Core Objectives, stated on Page 23 and page 24 of the Submission draft.

The development of the NP has taken a great deal of time and there have been many opportunities for residents to comment through that period and to help the plan evolve. The NP team should be congratulated on the work they have done to try to produce a plan that clearly reflects the residents views and desires, whilst working within the existing non-ideal planning policies.

The NP Policies that are associated with the Landscape & Biodiversity theme are extremely important to me. Policy SV8, SV8a, SV9, SV11, SV12, SV13 and SV14 are important, if for no other reason than to prevent the current creep of development in the countryside towards Shiplake, and along the A4155 within the parish, and the Shiplake villages will soon become one continuous built up area and a mere extension of Henley and Harpsden settlements.

The rural nature of the villages is extremely important to me and any resident that you speak to. Retention of the rural feel, with wide country views, mature trees, hedges and green landscapes with associated wildlife is essential to maintain this.

I hope that the policies in the NP will enable the Villages to develop and evolve and yet keep the distinctiveness of each of the areas. Using the policies developed under the Character and Design Theme, particluarly SV22, SV24, SV25 and SV26 and through developers embracing the feel and ambiance of each of the Special Character Areas, it is to be hoped that these policies will enable us to maintain the special feel of different areas within the Parish, which are an essential part of the appeal of Shiplake.

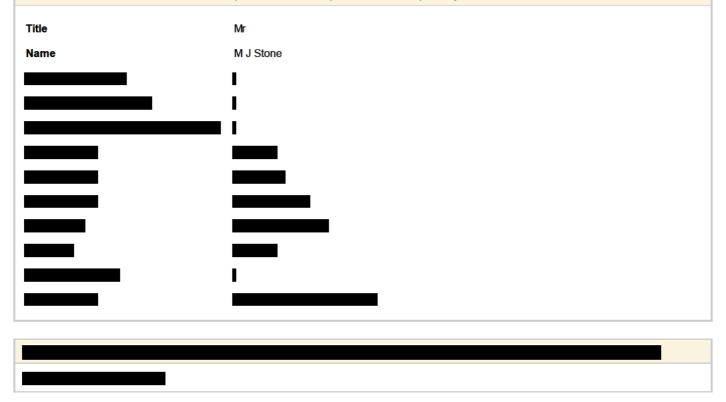
This NP is an essential element in allowing the villages in the Parish to develop in a manner suitable to a rural parish and to preserve the valuable nature of the villages, within the setting of/ vicinity of the Chiltern AONB, and the valuable landscape adjacent to the river Thames, whilst it finds itself acting as an unfortunate buffer between the expanding towns of Reading and Henley-on-Thames.

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 Shiplake Neighbourhood Plan:

No, I do not request a public examination

Your details and future contact preferences



Respondent Details



Individual

Your comments

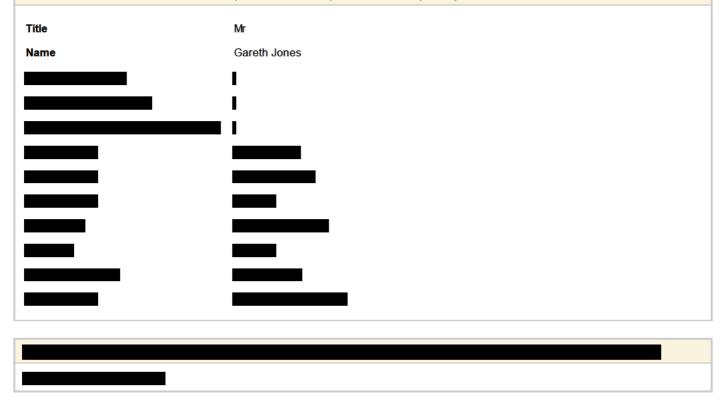
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I support the proposed Shiplake Neighbourhood Plan

Public examination

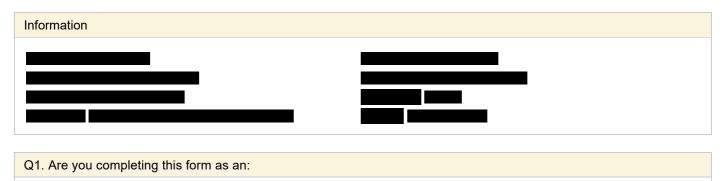
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No, I do not request a public examination





Respondent Details



Individual

Your comments

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I would like to support this plan.

This draft NP has taken many years to reach this stage and the plan should be progressed with all speed to finally reflect the wishes of the villages expressed in the many questionaire exercises and village consultations.

I fully support the visions and core objectives expressed within Volume 1, the submission draft.

The rural nature of the villages is extremely important to me. Retention of the rural feel, with wide country views, mature trees, hedges and green landscapes with associated wildlife, and dark skies is essential to maintain this.

The NP Policies that are associated with the Landscape & Biodiversity theme are extremely important to me especially Policies SV8, SV8a, SV9, SV11, SV12, SV13 and SV14, if for no other reason than to prevent the current creep of development replacement the countryside towards Shiplake, and along the A4155 within the parish. If this creeping loss of the countryside is not highlighted and prevented then the Shiplake villages will soon become one continuous built up area and contiguous with Henley and Harpsden settlements, or separated only by the polo field development.

The recognition of the distinct character areas within the parish seems a sens ble way to allow the villages to continue to evolve within the parish, whilst maintaining their unique qualities. The older historic areas are valuable and irreplaceable, and need to be treated differently for planning than the more suburban parts, otherwise their unique value will be lost.

Using the policies developed under the Character and Design Theme, particularly SV22, SV24, SV25 and SV26 and through embracing the feel and ambiance of each of the Special Character Areas, it is to be hoped that these policies will enable us to maintain the special feel of different areas within the Parish, which are an essential part of the appeal of Shiplake.

The intermittent wide countryside views together with the tree lined roads, frequently found within Lower Shiplake and Shiplake, are valued characteristics of any wa k within the parish, and loss of these, through housing estate development or lack of replacement of the green infrastructure would significantly detract from the rural character of the area, and impact the biodiversity greatly of the area. The local farmer does a great deal to try to retain wildlife features and manage his land to encourage biodiversity, and it seems imperative that the parish can require developers, through the NP, to take similar measures.

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.

I have no changes to propose.

Public examination

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No, I do not request a public examination

Your details and future contact preferences

Title	Mrs
Name	J Stone
	1
	1
	I

Respondent Details



Individual

Your comments

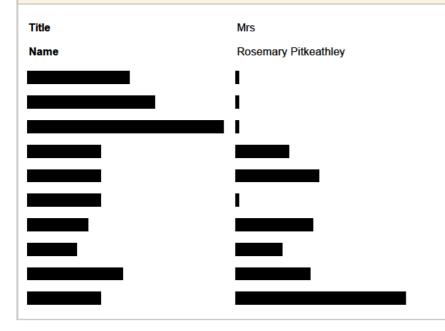
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I support the Neighbourhood Plan, and hope that the relevant planning authorities will listen to the views of the local community as outlined in the Plan.

Public examination

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Don't know



Respondent Details



Individual

Your comments

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It is now nearly five years since we began work on a Neighbourhood Plan. Much water has flowed under the bridge since then. The prospects we were sold by our MP and by SODC were very compelling: this was our opportunity as a community to shape our way forward over the next fifteen years, determine how we should I ke the village to evolve (or not), jointly consider and plan for the facilities we should like to encourage, and those we should discourage. Finally, SODC offered us a deal on building development: provided we committed to achieving the specified increase in dwellings over the period (thirty-one, at the time), SODC would support us in resisting development of which we as a community did not approve.

None of these aspirations has come to pass. SODC rapidly backtracked on their commitments, and watered down all promises to defend our neighbourhood. Residents were also steadily removed from the process: first we needed a consultant to do a landscape assessment; then another to carry out an environmental assessment. The huge effort we had put into documenting, analysing, and ranking every spare piece of land within and without the village curtilages was eventually over-ruled. Apparently the community is not deemed to be sufficiently qualified to be entrusted with this exercise, and yet another consultant was tasked with duplicating our efforts. Almost all the ideas discussed with residents for how parts of the villages could be transformed over the next decade have been removed.

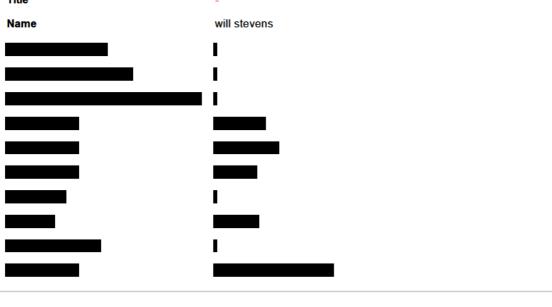
Which has led me to ask, what is the point of this Neighbourhood Plan? As a document it is impossible for a layman to read, It has long ceased to be a community project. Any protection against unwanted development we believed would be provided has vanished. Housing, retirement homes, large dwellings continue to proliferate, way beyond the target set in 2016. I cannot see any tangible vision for the future. What a complete waste of time.

Public examination

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No, I do not request a public examination





Respondent Details



Individual

Your comments

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Fully supportive

Public examination

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No, I do not request a public examination





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Respondent Details

Information	
Q1. Are you completing this form as an:	

Organisation

Your comments

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Response attached.

Q3. You can upload supporting evidence here.

• File: 2021-12-03 Shiplake Reg 16 Comments.pdf

Title	-
Name	Cheryl Soppet
Job title (if relevant)	Planning Policy Officer (Neighbourhood Planning)
Organisation (if relevant)	South Oxfordshire District Council
Organisation representing (if relevant)	-
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Address line 3	-
Postal town	-
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Telephone number	-
Email address	cheryl.soppet@southandvale.gov.uk

Policy and Programmes HEAD OF SERVICE: HARRY BARRINGTON-MOUNTFORD



Listening Learning Leading

Contact officer: Cheryl Soppet

cheryl.soppet@southandvale.gov.uk

Tel: 01235 422600

03 December 2021

<u>Shiplake Neighbourhood Development Plan – Comments under Regulation 16</u> of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

South Oxfordshire District Council has worked to support Shiplake Parish Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Shiplake Neighbourhood Development Plan (NDP) during the presubmission consultation. We note that the qualifying body has taken some of the council's advice on board and addressed a number of the concerns previously raised.

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

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

Cheryl Soppet Planning Policy Officer (Neighbourhood)

1	General comment	
2	We note various policies are referenced to be compliant with the neighbourhood plan and the development plan. In light of this the neighbourhood Plan once made forms part of the development plan so the reference to it within the policies is therefore not necessary and therefore for clarity we recommend this to be removed.	
2	Page 7 - C. further development outside the existing built area of the villages should require clear justification in accordance with the policies in the development plan and national policy;	The NPPF and the Adopted Local Plan 2035 require that development is appropriate to that location not that development outside the existing built area of villages should require clear justification in accordance with the policies in the development plan and the NPPF. We recommend the paragraph is amended to reflect this.
3	Page 24- 5.3.1 '4. Provide a catalyst for re- siting inappropriate and non- conforming type uses (i.e. uses that impact adversely on the character and/or amenity of the centre) from within the centre of Lower Shiplake in order to release land for residential-based development of a kind which will enable the achievement of the other plan objectives whilst also retaining these non-conforming uses locally to provide much needed services to the community. (Source: Sections 4.5, 4.6)'	The following paragraph lacks clarity and precision. The plan wants to act as a catalyst to move certain land uses from the centre, encourage residential development in its place. The plan also wants to retain the land uses that move away from the centre of Lower Shiplake in the parish. It is not clear what land uses would be affected, where these land uses would move to and thus it is not clear how this is proposed to be achieved.
4	Page 29 – 6.2.22 'It is therefore clear that there is a significant demand for employment land in the District and this is primarily in the B1 Use Class which is for employment activities that can operate without harm to residential amenity.'	The B1 use class is now under Use Class E and needs to be amended in this paragraph.
5	Page 32 - Policy SV2 - Rural Housing The development of additional dwellings in the open countryside will only be	Policy SV2 relates to rural housing outside the built-up area of the villages. We have previously advised the neighbourhood planning group to simplify and merge Policies SV1 and

supported if they are necessary or suitable for a countryside location,	SV2. The policy wording could be simplified as follows:
consistent with the policies of this Plan and the Development Plan for the district and appropriate as defined in the NPPF from time to time, including where:	Within the built-up area of the villages infill development and redevelopment of previously developed sites will be supported, subject to compliance with other applicable policies in the Development Plan.
1. The development constitutes permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended or replaced); or	Proposals for new dwellings outside the built-up area of the villages will only be supported if they are necessary or suitable for a countryside location and consistent with the policies in the Development Plan for the district.
2. The purpose is to divide a larger existing dwelling into two or more smaller dwellings; or	We recommend the definition of appropriate development set out in the NPPF is removed or moved into supporting text to help future proof the plan.
3. The development involves the redevelopment of redundant or disused buildings and would not adversely affect the landscape or rural character of the countryside or area of valued landscape in which it is located; or	
4. The development would deliver a rural worker's dwelling which meets the relevant tests; or	
5. The development facilitates the future protection of a heritage asset (either through reuse or where such development would represent enabling development); or	
6. The development would deliver a dwelling that is exceptional in terms of its design, and which respects	

	the character of the locality,	
	significantly enhancing the	
	local landscape setting.	
6	Page 32	The reference to "formerly Lice Class
0	Fage 32	The reference to '*formerly Use Class
	'*formarly Llos Close P1'	B1' is not necessary within the policy
7	^{(*} formerly Use Class B1'	wording and should be removed.
7	Page 35	This sentence is unfinished and does
	62.10 Madian haves prices	not direct you to where it was intended
	6.3.18. Median house prices	to. We recommend that "are as
	²⁶ for dwellings, semidetached	follows" is changed to indicate where
	and terraced dwellings in	they are shown (i.e. Table 3).
0	Shiplake are as follows:'	The policy includes on educinistrative
8	Page 40 - Policy SV5-	The policy includes an administrative
	Dwelling Statement	requirement, it requires the
		submission of a 'Dwelling Statement'
	All applications for new build	This requirement is overly onerous
	residential development shall	and doesn't practically contribute
	be accompanied by a	towards achieving the policy objective.
	'Dwelling Statement'	We therefore suggest that the policy
	identifying how the proposed	focus is on the mix of dwellings that
	accommodation will meet the	should be delivered.
	specific housing needs of the	Ma recommend that policy CV/E is
	villages. This statement	We recommend that policy SV5 is
	should provide details of how	amended to reflect a similar approach
	the development: -	to the adopted Little Milton NDP policy
	a. Meets the specific villages'	LM13 which is detailed below and has
	needs including affordability of	passed examination.
	different groups in the	
	community such as, but not	Deliev I M12 Dwelling Mix
	limited to: young people; local	Policy LM13 - Dwelling Mix
	workers; small families; older	A. Proposals for new residential
	residents including downsizers; and people with	development will be required to
	disabilities; and	demonstrate a mix of dwelling types and sizes which:
		1. Meet the needs of current and
	b. Complies with the	future households, and
	Nationally Described Space	
	Standards or their successor.	2. Address the district wide shortage of smaller houses, and
		3. Are appropriate to the site in terms
		of style and design,
		B. Proposals that recognise the need
		for smaller dwellings and comprise
		single houses, terraced cottages or
		groups of small detached or semi-
		detached houses with a maximum of 3
		bedrooms will be particularly
		supported. C. Development on rural
		exception sites that are conformity

		with the Development Plan will be supported.
9	Page 40 Policy SV7 – Replacement Dwellings	The policy as currently worded is overly restrictive.
	The replacement of a dwelling will be permitted provided that the dwelling to be replaced:	The first bullet point is in conflict with paragraph 194 of the NPPF which allows for the loss of listed buildings in exceptional circumstances.
	 is not listed individually or as part of a group listing (see page 24 of the Character Appraisal at Appendix 6 and also Appendix 2 to this Plan); is not a building of heritage value, unless the scale of any harm or loss and the degree of significance of the heritage asset is outweighed by the benefits; or is not considered to contribute positively towards the landscape character or built environment in which it is located. 	The section setting out: "In the event that the proposed replacement dwelling is not located on the original footprint, unless environmental reasons prevent it from occurring, the existing dwelling must be removed from the site prior to the completion of the development, or within 1 month of the first occupation of the new dwelling, where the existing dwelling remains in residential use by the occupier during the construction period." is overly restrictive and unduly onerous. It imposes an arbitrary requirement that the existing dwelling must be removed within 1 month of occupation of the new dwelling. It adds an additional policy requirement that
	the character and appearance of the area, in accordance with Shiplake Neighbourhood Plan policies SV8, SV24 and SV25.	does not exist in national or local policy. Such matters where appropriate are better addressed through the development management process and planning conditions.
	Replacement dwellings shall avoid giving rise to an adverse impact on the amenity of neighbouring residential properties. As part of this, they should seek to maintain the amount of separation to either side of the new dwelling. Additional landscape planning between the dwelling and its neighbouring properties will be strongly supported provided it does not lead to loss of daylight /	We suggest the word unacceptable is inserted before loss of daylight so that it reads 'does not lead to an unacceptable loss of daylight/sunlight'

	sunlight or overshadowing for either dwelling.	
	In the event that the proposed replacement dwelling is not located on the original footprint, unless environmental reasons prevent it from occurring, the existing dwelling must be removed from the site prior to the completion of the development, or within 1 month of the first occupation of the new dwelling where the existing dwelling remains in residential use by the occupier	
	during the construction period.	
10	Page 55 – Policy SV9- Valued Landscapes The Neighbourhood Plan identifies a number of valued landscapes on figure 15 (Parish Landscape Character	We note that the valued landscapes cover most of the open countryside within the NDP area. We consider this coverage to be a broad-brush approach, We have previously advised the neighbourhood planning group that the areas should be refined.
	Areas) as follows:	
	 River Thames Meadows and Terraces (PLCA) Shiplake Woods (PLCA) 	We note that the landscape character assessment was updated in April 2021. All of the four parish landscape character areas (PLCA's) identified in
	 Shiplake Woods (FECA) Shiplake Semi-Enclosed Dipslopes (PLCA) 	the assessment are also found to be valued landscapes 'in NPPF 2019 paragraph 170 terms'. These types of local landscape designation policy
	• Shiplake Open Dipslopes (PLCA) Development proposals should ensure the characteristics which define the landscapes as valuable are reflected in the proposals, including:	were abandoned in favour of the landscape character led approach in the early 2000's, in accordance with best practice advice at that time, such as the Area of Great Landscape Value which was last included in the 1992 South Oxfordshire Rural Areas Local Plan.
	• The retention of the distinct rural character of each of the valued landscapes	The term 'valued landscapes' has since been introduced in the NPPF, and recent draft Landscape Institute
	 the role they play in providing a setting to the AONB 	advice (TGN 02/21) on assessing valued landscapes has been issued.

	TGN 02/21 Landscape Value and
the intrinsic character and	Valued Landscapes, notes that '3.2.1
beauty of the countryside	Landscape value at the local authority
	or neighbourhood level can be
 the important contribution 	mapped spatially (i.e. through local
the landscapes make to the	landscape designation). However,
distinctive character and	absence of designation does not mean
identity of the settlements of	absence of value and landscape value
Shiplake Cross and Lower	can also be described as part of
Shiplake Proposals for development appropriate to a	evaluative studies linked to landscape
countryside location will be	character assessment. Each approach
supported where they do not	can highlight particular aspects of the
adversely impact on the	landscape that are valued and the LI
purpose or qualities of the	considers that there is a place for
valued landscapes.	both. Where possible, the value
	placed on a landscape should be
	defined in development plan
	documents adopted for that area.'
	Advice in the Landscape Institute draft
	advice note, TGN 02/21, with respect
	to coming to a judgement of landscape
	value, includes (3.4.1.1) 'The
	identification of landscape value needs
	to be applied proportionately ensuring
	that identification of valued landscape
	is not overused.'
	See below with respect to comments
	on the methodology used in the
	assessment, which does not seem to
	follow recognised guidelines and lacks
	clarity with respect to how the
	definition of valued landscape has
	been arrived at.
	Whilst the policy does not preclude
	-
	,
	The methodology for the Landscape
	Character Assessment should be
	clearly set out identifying what
	development appropriate to a countryside location, the valued landscape categorisation would presumably bring into play NPPF 174, which requires that valued landscapes are protected and enhanced. The methodology for the Landscape

guidance has been followed, the criteria considered in the desk and field studies and how these are drawn together to produce the character areas.
It is also not clear what methodology has been used for the valued landscape assessment. This doesn't seem to follow the guidance set out in GLVIA3 which assesses landscapes against a set of criteria in Box 5.1 (landscape quality/condition; scenic quality; rarity; representativeness; conservation interests; recreation value; perceptual aspects; associations) or the LI draft guidance note TGN 02/21 which includes a similar list but also includes spatial function. Landscape quality/ condition, rarity and representativeness are not covered.
The lists set out under 'key valued landscape characteristics' specific to each character area, include items such as 'weak hedgerow structure and no woodland cover, 'a mix of open roads with cars visible across landscape', and 'no watercourses'.
These seem to be just landscape characteristics rather than valued landscape characteristics. The lists set out under Valued Landscape at the end of each character area description often relate to contributing to the setting of the AONB or the Thames, which have not been mentioned previously.
They also refer to 'many landscape features of value in their own right as set above', which would include a vast number of features, not all of them apparently of value as noted above, rather than identifying the specific features of value.

		A clear methodology is needed to enable an understanding of the process which has led to the valued landscape categorisation. We recommend the examiner seeks clarification of the points above.
11	Page 56 - Policy SV10 – Riverside Related Development Development proposals adjacent to the River Thames should protect and enhance the waterside character, heritage value and setting, and will provide physical and visual links with the surrounding areas (including views along the river). Development proposals will	We recommend the sentence 'Development proposals will promote and enhance the use of the river and the riverside by:' is replaced with 'As appropriate to their nature and scale development proposals should promote and enhance the use of the riverside by:'
	 promote and enhance the use of the river and the riverside by: Maintaining the low key and informal nature of infrastructure and facilities for boat users including jetties, private and public moorings, slipways, steps and stairs; Supporting opportunities to 	the local authority will seek financial contributions and lists some types of infrastructure projects CIL funds may be spent on. Spending CIL funds is a budgetary decision, made by the appropriate council, which cannot be committed by a neighbourhood plan policy. A neighbourhood plan can highlight the infrastructure that it believes should be prioritised, but it cannot commit CIL receipts. We recommend this section is modified
	 improve the quality of and links to the riverside rights of way; Carefully managing the proliferation of river-based and riverside recreation and leisure activities 	accordingly and moved to Section 7.1 where you have set out a list of your priorities.
	 Protecting and enhancing the Thames River Corridor as a valuable resource for 	

	biodiversity and wildlife (wildlife corridor) • Demonstrating the proposals	
	will not lead to harm to the setting or landscape character of the riverside;	
	• Ensuring that there will be no significant adverse impact upon navigation and flood risk.	
	Major development within the defined riverside corridor (highlighted in blue on figure 15) shall be accompanied by a landscape and visual impact assessment which demonstrates that proposals will not give rise to adverse landscape and visual effects.	
	Provided the legal tests* are satisfied the planning authority will seek financial contributions from new developments through planning obligations towards improving the quality of the riverside environment including river infrastructure, open spaces, biodiversity, rights of way, and links to the riverside from the surrounding area.	
	* The legal tests are also known as the Community Infrastructure Levy, or 'CIL', Regulation 122 tests	
12	Page 56 - Policy SV11 – Important Views	The important views shown in Figure 21 are expansive, most of them covering 360 degrees and covering most of the undeveloped parish. For clarity the drawing needs to be refined to reflect more closely the views described in the policy. To avoid misinterpretation, photographs could

		also be included to identify each of the
13	 Page 58 - Policy SV12-Dark Skies and Lighting Policy SV12 - Dark Skies and Lighting 1. Development proposals that conserve and enhance relative tranquility, in relation to light pollution and dark night skies, and comply with other relevant policies will be permitted, provided it can be demonstrated that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance (CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, or any equivalent replacement/updated guidance) for lighting within environmental zones, and have regard to the following hierarchy: a. The installation of lighting is installed it is necessary for its intended purpose or use and any adverse impacts are avoided; and c. If it is demonstrated that (a) or (b) is not achievable, then adverse impacts are appropriately mitigated. 2. To be appropriate, lighting for development proposals should ensure that: a. The measured and observed sky quality in the surrounding area is not reduced; b. Lighting is not unnecessarily visible in 	views listed Item d refers to building design that results in increased light spill. This will be impractical to implement unless made more specific, we therefore suggest this is revised to 'building designs which include large areas of glazing resulting in light spillage into rural and unlit areas are avoided' Adding reference to suitable mitigation measures may simply encourage mitigation proposals such as the use of internal blinds, which can't be relied upon.

	nearby designated and key habitats; c. The visibility of lighting from the surrounding landscape is avoided; and d. Building design that results in increased light spill from internal lighting is avoided, unless suitable mitigation measures are implemented.	
14	Page 59 – para 6.4.89 'Central to the theme is the requirement to achieve a 'biodiversity net gain', an approach to development that is likely to become enshrined in legislation should the Environment Bill, introduced to Parliament on the 15th October 2019, receive royal assent.'	The Environment Bill mentioned in this paragraph is now the Environmental Act 2021 and should be updated to reflect this.
15	Page 59- Policy SV13 – Biodiversity Net Gain All development proposals in the Parish should seek to deliver a biodiversity net gain of at least 10% having regard to the requirements of Section 40 of the Natural Environment and Rural Communities Act 2006 and section 15 of the National Planning Policy Framework. In addition, the following measures will be supported in the determination of planning applications for development in the Neighbourhood Plan area: a. Avoidance of the	References within the policy to the Environment Bill 2019 need be updated to Environment Act 2021. The text of SV13 strongly encourages all development proposals to deliver at least 10% net gain for biodiversity which is consistent with the Act. At present the 10% net gain requirement in the Act has not come into force and the date at which this becomes a mandatory requirement will be set out in 'supplementary regulations' along with any exceptions to the 10% requirement.
	a. Avoidance of the unnecessary loss of mature and veteran trees, hedgerows, orchards or other form of wildlife corridor and	is consistent with the Act and SOLP 2035 but not absolute, allowing flexibility where 10% cannot be achieved or for any types of

	 biodiversity concentration. Any loss shall be mitigated on site or in an approved alternative location in accordance with a planning scheme which shall accompany the application for planning permission; b. The inclusion of measures to provide wildlife corridors in order to maintain, retain and secure connectivity of the wider network; c. Where the loss of 	development which are subsequently excepted from the 10% requirement by supplementary legislation. We recommend the insertion of one word to SV13 to make it consistent with SOLP 2035 and national guidance related to the mitigation hierarchy: Point A, second sentence: 'Any loss shall be mitigated on site or
	scrubland is unavoidable, the retention of sufficient areas of vegetation on the site linked to adjacent habitats, wildlife corridors or hotspots to allow wildlife to pass around or through the site;	<i>compensated</i> in an approved alternative location'
	d. The provision of one or more of the following: Owl boxes; bat boxes; and bird boxes (particularly suited to their use by swifts, swallows and house martins) should be installed as an integral part of any new or replacement dwellings; e. Culverted watercourses shall be re- opened where feasible and linked to wetland creation	
16	Page 60 - Policy SV14- Landscaping and Greening of the Environment In determining applications for development on land that lies within or adjoining the Green and Blue Infrastructure	This policy could be simplified to provide a clearer direction for development. We therefore recommend to the examiner that the policy should be amended using a similar approach to the wording as detailed below:
	Network defined on figure 10 regard will be had to the degree to which the	'As appropriate to their nature and scale, development proposals should:

	landscaping schemes, layouts, public open space provision and other amenity requirements arising from the development (such as pedestrian and cycle connections) will maintain or enhance the visual characteristics and biodiversity of the Network and will contribute to or improve the connectivity and maintenance of the Network. Proposals which maintain or enhance the existing Green and Blue Infrastructure Network will be supported, particularly where they encourage the planting of native trees or encourage biodiversity and enhance habitats of protected species. Proposals to create new Green and Blue Infrastructure and associated new pedestrian and cycle routes will also be supported.	 demonstrate how the landscaping schemes, layouts, public open space provision and other amenity requirements arising from the development (such as pedestrian and cycle connections) will maintain or enhance the visual characteristics and biodiversity of the Network and will contribute to or improve the connectivity and maintenance of the Network. Development proposals are particularly encouraged to plant native trees, improve biodiversity and enhance habitats for protected species. Proposals to create new Green and Blue Infrastructure and associated new pedestrian and cycle routes will be supported.'
17	Page 60 - Policy SV15– Preservation and Replacement of Trees Policy SV15 – Preservation and Replacement of Trees Development proposals affecting trees and woodlands should where appropriate: a)	We've consulted the council's Senior Tree Officer who has provided the following comments and recommendations. Comments are in blue and recommended alternative wording are in blue and bold:
	Avoid unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development;	Policy SV15 – Preservation and Replacement of Trees Development proposals affecting trees and woodlands should where appropriate
	 b) Be supported by adequate tree survey information as part of planning applications; c) Include a comprehensive landscaping scheme to secure a wide range of tree planting. 	a) Avoid unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development;

	b) Be supported by adequate tree
d) Be designed to provide sufficient space for planting to be accommodated, and	survey information as part of planning applications;
demonstrate that trees that die or are diseased will be replaced for the first five years following planting.	c) Include a comprehensive landscaping scheme to secure a wide range of tree planting.
e) Ensure that trees not to be retained as a result of the development are replaced at a ratio of at least 2:1; and	d) Be designed to accommodate new trees by providing sufficient soil volume for roots and space for mature canopy establishment, ensuring sufficient separation from dwellings.
f) Provide for additional, new, native trees to be planted at a minimum of: i. Five saplings at a density of 1,100 saplings/ hectare for each dwelling for	d1) Demonstrate that any dead or diseased trees will be replaced for the first five years following planting.
residential development; or ii. For non-residential development, whichever is the greater of five trees for each	e) Ensure that trees not to be retained as a result of the development are replaced at a ratio of at least 2:1; and
parking space; or two trees per 50m2 of gross floorspace Infill development proposals are encouraged to plant additional, new, trees using larger planting stock e.g. 10 to 12cm girth at 1m above ground level.	f) Provide for additional, new, native trees to be planted at a minimum of: (not always appropriate for all tree planting to be native. Other none natives may be more suited to the site conditions. Simply relying on natives may limit what can be achieved)
ground level.	i. Five saplings at a density of 1,100 saplings/ hectare for each dwelling for residential development; or
	ii. For non-residential development, whichever is the greater of five trees for each parking space; or two trees per 50m2 of gross floorspace
	This proposal is too complicated and prescriptive to implement. This type and density of planting is used for creating woodlands or a copse. Only in larger scale schemes would this sort of planting be appropriate. For smaller residential schemes it would be better to specify a number of trees to be planted within the curtilage of each dwelling and then emphasise that

		development proposals must include a high quality tree planting scheme as part of site wide landscaping. (I would suggest a minimum of 2 trees within the boundary of each dwelling).
		Infill development proposals are encouraged to plant additional, new, trees using larger planting stock e.g. 10 to 12cm girth at 1m above ground level. (Only in a very small number of cases would it be better to use planting stock above 10 to 12cm, often 8 to 10cm would be better. Smaller planting stock tends to establish better in the long term. Often a combination of planting sizes is better. The larger stock to give a bit of instant landscape impact, whilst the smaller stock will grow on to provide the long term tree cover for the area. It might be better to broaden the wording to be less restrictive.)
		Overall to get the best results tree planting should be made up of a wide variety of tree species to provide a visually interesting treescape, resistant to pest and disease. See below some suggested wording
		"A mix of broadleaf and coniferous tree species is required with no more than 20% of any genus and no more than 10% of a particular species on the site. This is to prevent major impacts on the landscape in event of disease."
19	Page 71 - Policy SV20– Protection of Existing Rights of Way and Cycle Network Development proposals which affect rights of way or the	There is an element of repetition between this policy and SV21 which both are worded in an overly restrictive manner. The policy should be worded 'should' rather than using phrases such as 'will be resisted' to be
	 cycle network in the Plan area will be determined having regard to the following criteria: a. Any proposals that result in the obstruction 	positively worded and to provide a clear direction whilst allowing for an appropriate degree of flexibility. The diversion of footpaths is controlled outside the planning system. It may not be possible and practical in all

or requires the diversion or urbanisation of a public footpath, bridleway or cvcle way to the	circumstances to stop development proposals that require the diversion or urbanisation of public footpaths.
detriment of the	The Berrick Salome NDP, which has
community will be	passed examination, offers a good
resisted.	example of how the policy could be
b. Proposals which harm	modified we therefore suggest the
the following	following wording:
existing public rights of	Development proposals will be
way and the cycle	supported, provided that, where
network will be	appropriate to the location, they have
resisted: Safety;	regard to the following walking, cycling
Directness; Access and	and riding principles, and they accord
Connections;	with the other policies of the Plan and
Attractiveness;	the adopted development plan:
Convenience; Features	• if they adjoin a public footpath or
such as trees and	bridleway, have regard to maintaining
nedgerows.	the functionality and rural character of
c. Proposals for	the footpath or bridleway, unless this
development adjoining	is unavoidable, in which case the route
a public footpath or	should be diverted in a way that
bridleway shall ensure	remains safe and convenient for
that the rural character	users;
of the footpath or	• if they lie in a location that enables a
bridleway is	new pedestrian, cycle link and/or
maintained.	bridleway to be created to an existing
d. Proposals that protect	public footpath or bridleway, that the
the Parish cycle path	layout and access arrangements of
network will be strongly	the scheme allow for such an
supported.	improvement, provided they avoid or
	 minimise the loss of mature trees and hedgerows and use materials that are consistent with a rural location it is located in an area which facilitates and where possible encourages walking, cycling and riding to access The Parish.
Page 71 -Policy SV21-Cycle Network, Rights of Way, Footpaths and other Routes	The final part of the policy suggests that the local authority will seek financial contributions and lists some types of infrastructure projects CIL
'Developer or CIL	funds may be spent on. Spending CIL
contributions will be sought to	funds is a budgetary decision, made
fund improvements to the	by the appropriate council, which
existing cycle and footpath	cannot be committed by a
networks as well as	neighbourhood plan policy. A
	diversion or urbanisation of a public footpath, bridleway or cycle way to the detriment of the community will be resisted. b. Proposals which harm the following characteristics of existing public rights of way and the cycle network will be resisted: Safety; Directness; Access and Connections; Attractiveness; Convenience; Features such as trees and hedgerows. c. Proposals for development adjoining a public footpath or bridleway shall ensure that the rural character of the footpath or bridleway is maintained. d. Proposals that protect the Parish cycle path network will be strongly supported. Page 71 -Policy SV21-Cycle Network, Rights of Way, Footpaths and other Routes Developer or CIL contributions will be sought to fund improvements to the existing cycle and footpath

	new connections, where these have been identified and can be delivered.'	neighbourhood plan can be used to highlight the infrastructure that should be prioritised, but it cannot commit CIL receipts. We recommend this section is amended accordingly and moved into Section 7.1 where you have set out a list of your priorities.
22	Page 78 – Policy SV25– Building Materials / Design / Density / Layout 'minimising the impacts on residential amenity of the construction arrangements by way of lorry movement, deliveries, working times, lighting, parking of contractor's vehicles, wheel washing provision and street cleaning'	This bullet point is normally dealt with through the development management process via a planning condition and therefore should be deleted.
23	Page 78 – Policy SV25– Building Materials / Design / Density / Layout 'Support will be given to development which reflects local building styles and detailing, and which uses traditional materials as described in the Character Appraisal, especially within the setting of heritage assets. Proposals will be expected to demonstrate compliance with the Design Principles in the Character Appraisal for the character area within which the site is located.'	This paragraph duplicates the requirements set out in the first part of the policy and is therefore not necessary. The last sentence highlighted in yellow is also considered to be overly restrictive. We recommend 'demonstrate compliance' is replaced with 'have regard to'.
24	Page 78 – Policy SV25– Building Materials / Design / Density / Layout 'Proposals involving the removal or replacement of	It is not clear from the final paragraph why the caveat is necessary, we consider the removal of an unsympathetic structure already an improvement and a positive contribution and therefore it may not

unsympathetic structures and materials will be supported where there is a net benefit to the character area.'	be appropriate for it to be conditional on providing a net benefit. Requiring an improvement is overly onerous.
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Respondent Details



Your comments

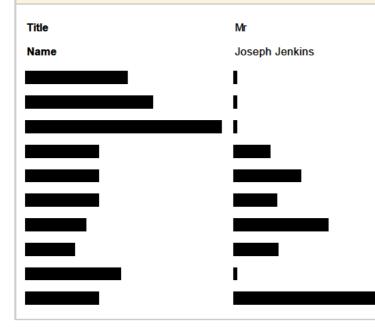
Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

I support the Shiplake Neighbourhood Plan.

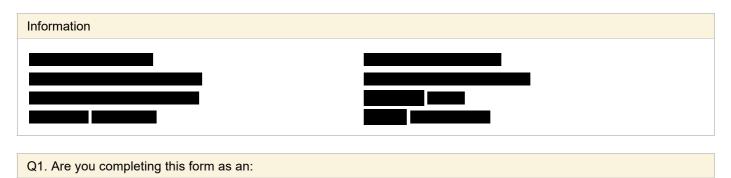
Public examination

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 Shiplake Neighbourhood Plan:

No, I do not request a public examination



Respondent Details



Individual

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email below:

Dear Sirs

We wish to protect Shiplake from uncontrolled, large scale development. If we are obliged to have further unwanted development in our villages these conditions need to be considered:

1. Manage development proposals in sustainable locations where they can take advantage of services and facilities located in the centre of the village

2. Appropriate development to include affordable housing

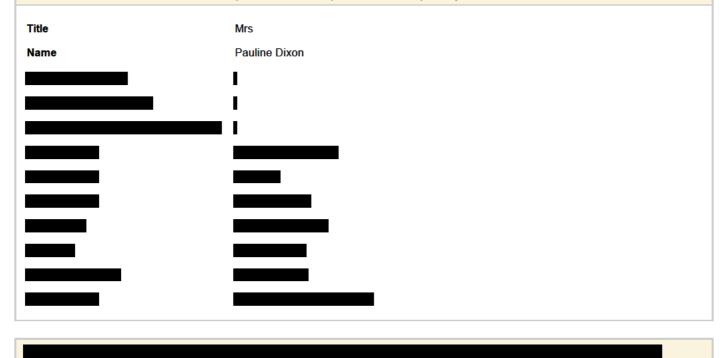
- 3. Ensure development is sympathetic to and enhance the look and feel of the village
- 4. Protect and minimise the loss of greenfield sites by encouraging the redevelopment of previously developed sites
- 5. Give the village the potential to access Community Infrastructure Levy (CIL)funding to improve village facilities

6. following on from the Shiplake Village Plan 2014 provide a road map of additional actions to improve the villages facilities, services and local environment and to address issues beyond the scope of the original SVP. Yours faithfully

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 Shiplake Neighbourhood Plan:

No, I do not request a public examination



Respondent Details

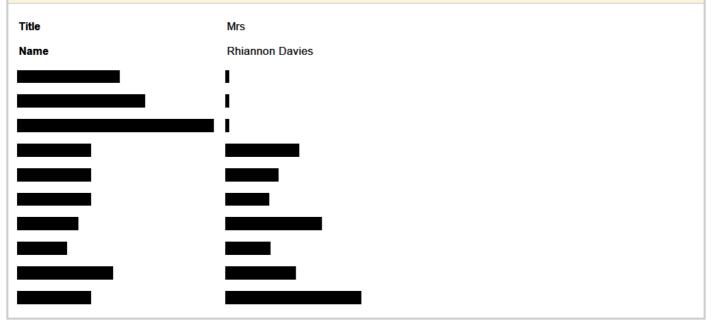
Information	
Q1. Are you completing this form as an:	
Individual	

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 Shiplake Neighbourhood Plan:

No, I do not request a public examination

Your details and future contact preferences



Respondent Details



Individual

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

This is to endorse my support for this Neighbourhood Plan .

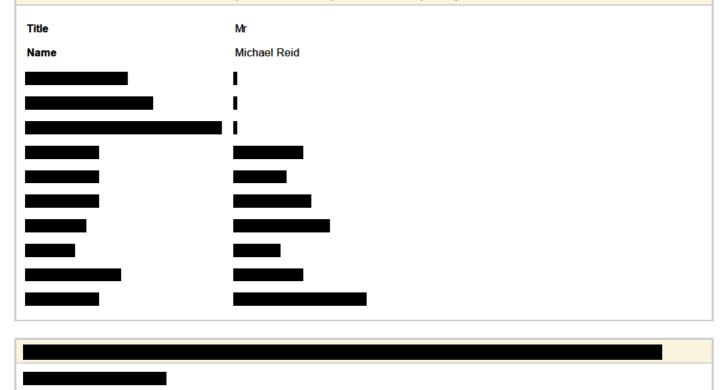
I am particularly concerned that the current envelope of the built up areas of Lower Shiplake and Shiplake Cross should remain in place and building outside of this envelope should not be permitted. In particular the farmland bordered on both sides of Mill Lane and the farmland bordered on both sides by New Road and the A4155. Lower Shiplake and Shiplake Cross can thereby be seen to be two 'small' villages.

Demolition of old character houses to make way for new estates should be discouraged, as should 'over' infilling of gardens.

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 Shiplake Neighbourhood Plan:

No, I do not request a public examination





Respondent Details



Organisation

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

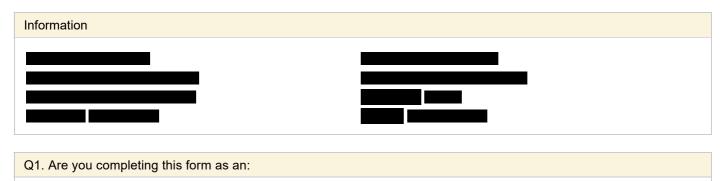
Response received via email below from Scottish & Southern Electricity Networks:

Rosalynn,

Thank you for your message below, together with the link to the NP web-site, regarding the above topic/location. I can confirm that, at present time, I have no comments to make. Regards,

T '41-	
Title	-
Name	Chris Gaskell
Job title (if relevant)	Network Connections Planning Engineer
Organisation (if relevant)	Scottish & Southern Electricity Networks
Organisation representing (if relevant)	-
Address line 1	1 Woodstock Road
Address line 2	-
Address line 3	-
Postal town	-
Postcode	OX5 1NY
Telephone number	-
Email address	chris.gaskell@sse.com

Respondent Details



Organisation

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email below from The Coal Authority:

Dear Rosalynn

Thank you for your email below regarding the Shiplake Neighbourhood Plan Consultation. The Coal Authority is only a statutory consultee for coalfield Local Authorities. As South Oxfordshire District Council lies outside the

coalfield, there is no requirement for you to consult us and/or notify us of any emerging neighbourhood plans. This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary. Kind regards and take care.

Title	-
Name	Deb Roberts
Job title (if relevant)	Planning and Development Manager
Organisation (if relevant)	The Coal Authority
Organisation representing (if relevant)	-
Address line 1	200 Lichfield Lane
Address line 2	-
Address line 3	-
Postal town	-
Postcode	NG18 4RG
Telephone number	-
Email address	thecoalauthority-planning@coal.gov.uk

Respondent Details

Information	
Q1. Are you completing this form as an:	

Organisation

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Network Rail. Please see attachment.

Q3. You can upload supporting evidence here.

• File: 2021-11-25 - Network Rail.pdf

Title	-
Name	Ian Wheaton
Job title (if relevant)	Town Planner
Organisation (if relevant)	Network Rail
Organisation representing (if relevant)	-
Address line 1	Temple Point
Address line 2	-
Address line 3	-
Postal town	-
Postcode	BS1 6NL
Telephone number	-
Email address	Ian.Wheaton@networkrail.co.uk

Whiteley, Rosalynn

From:	lan Wheaton <lan.wheaton@networkrail.co.uk></lan.wheaton@networkrail.co.uk>
Sent:	25 November 2021 16:23
To:	Planning Policy S&V
Subject:	Shiplake Neighbourhood Plan - Network Rail Comments
Follow Up Flag:	Follow up
Flag Status:	Flagged

EXTERNAL

OFFICIAL

Dear Sir or Madam,

Consultation on Shiplake Neighbourhood Plan.

Thank you for consulting us on the Shiplake Neighbourhood Plan. This email forms the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Level Crossings:

Any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved

• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing

- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs

• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing

• By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions. The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

• (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to requires that ... where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".

Developer Contributions:

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

- A requirement for development contributions to deliver improvements to the rail network where appropriate.
- A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.

 A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. With this in mind any planned future development (both residential and employment) should take into account any adverse impact on railway. This might be an increase in the use of an existing level crossing. It could be that the predicted growth, may increase future demands at nearby stations which may, in turn, necessitate the need for enhancements to existing facilities such as waiting rooms, toilets and parking. Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process.

Please can you bear this in mind when setting out the planning policies used to deliver any new development.

We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents. We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.

We trust these comments will be considered in your preparation of the forthcoming Plan documents.



Ian Wheaton MRTPI

Town Planner Network Rail - Wales & Western Temple Point, Redcliffe Way, Bristol, BS1 6NL Mobile: 07713 302676

Please note, I work condensed hours from Monday to Thursday, not working on Fridays.

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.

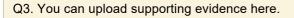
Respondent Details

Organisation

Your comments

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Response received via email from Natural England. Please see attachment.



• File: 2021-11-30 - Natural England.pdf

Title	-
Name	Sharon Jenkins
Job title (if relevant)	-
Organisation (if relevant)	Natural England
Organisation representing (if relevant)	-
Address line 1	Hornbeam House, Crewe Business Park
Address line 2	-
Address line 3	-
Postal town	-
Postcode	CW1 6GJ
Telephone number	-
Email address	consultations@naturalengland.org.uk

Date:30 November 2021Our ref:372757Your ref:Shiplake Neighbourhood Plan and associated documents

Ms Rosalynn Whiteley Enquiries/Assistant Planning Officer (Neighbourhoods) South Oxfordshire District Council

BY EMAIL ONLY planning.policy@southandvale.gov.uk



Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Ms Whiteley

Shiplake Neighbourhood Plan and associated documents

Thank you for your consultation request on the above dated and received by Natural England on 26th October 2021.

At this time, Natural England is not able to fully assess the potential impacts of this plan on statutory nature conservation sites or protected landscapes or, provide detailed advice in relation to this consultation. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.

The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the deciding authority to determine whether or not the plan is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the impacts of the plan on the natural environment to assist the decision making process.

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the <u>National Planning</u> <u>Practice Guidance</u>. The guidance highlights three triggers that may require the production of an SEA, for instance where:

•a neighbourhood plan allocates sites for development

•the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan

•the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Yours sincerely

Sharon Jenkins Operations Delivery Consultations Team Natural England

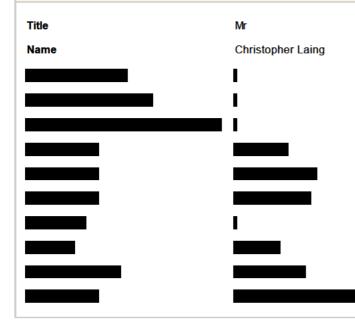
Respondent Details



Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

An enormous amount of time and effort has been expended on preparing this plan. My concern is that the views and policies contained within the plan will be recognised as being the collective views of these two villages. Residents cannot be blamed for being sceptical given the decisions on sites on the edges of the parish boundary but clearly within the confines of Lower Shiplake. Residents have an intimate knowledge of their villages and this must be accepted and recognised. Having said that, my support for those who have toiled to complete this plan is wholehearted.



Respondent Details

Information	
Q1. Are you completing this form as an:	

Organisation

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Chilterns Conservation Board. Please see attachment.

Q3. You can upload supporting evidence here.

• File: 2021-12-07 - Chilterns Conservation Board.pdf

Title	-
Name	Michael Stubbs
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7th December 2021

By email only to My Ref.: F:\Planning\Planning Policy\Shiplake Neighbourhood Plan

Shiplake Neighbourhood Plan - regulation 16 Submission draft.

Dear Shiplake Neighbourhood Plan Steering Group

Thank you for consulting the Chilterns Conservation Board (CCB). The CCB previously commented, on 29th May 2021, on the regulation 14 consultation. We support this plan, its objectives, and its vision. The policies that protect the Chilterns AONB and its setting, to the north-west of the neighbourhood plan area, are clear, robust, and based upon a sound and comprehensive landscape evidence base.

For ease of reference, we append (below) our regulation 14 comments. For the current regulation 16 comments we only have a few comments to make, mostly dealing with minor textual amendments. To assist, we set these comments in a table.

Regulation 16 Comments. All these comments are relatively minor, set against our support for this plan. We use both strikethrough and <u>underlined text</u>, for deletions and additions.

Regulation 16 Submission Draft	CCB's Comments
5.2 Vision and Core Strategy	We strongly support these as they apply to
	the AONB and its setting (second bullet on
	high quality landscape).
Core Objectives.	We strongly support these. At objective 3 we propose a minor textual amendment (reason – to harmonise with the policy used in the NPPF at 176 and to link with the plans own table at 5.3.3 and Neighbourhood Plan objectives at 6.4).
	<i>3. Sustain the sensitive landscape setting of the villages and preserve <u>conserve</u> and enhance the areas of natural landscape</i>

Paragraph 6.4.8 and 6.4.17 to 6.4.19.	 We would express strong support for these AONB policies, including the setting of the AONB. 6.4.19 deals comprehensively with the implications of the Glover review and allows for appropriate future reporting of the potential future outcomes. We strongly support the Shiplake Woods protections as set out in PLCA 2 and at 6.4.27 to 6.4.31.
Policy SV9 –Valued Landscapes The Neighbourhood Plan identifies a number of valued landscapes on figure 15 (Parish Landscape Character Areas) as follows: • River Thames Meadows and Terraces (PLCA) • Shiplake Woods (PLCA) • Shiplake Semi- Enclosed Dipslopes (PLCA) • Shiplake Open Dipslopes (PLCA)	We support this policy. As some of the land is within the setting of the AONB it is clearly and rightly identified as valued (with reference to the NPPF and work by the Landscape Institute). <u>Land that is</u> within the AONB is also valued but is acknowledged by the Landscape Institute's guidance to be 'highly valued'. The AONB is a nationally protected landscape by virtue of the legislation that establishes such status and strives to protect, conserve, and enhance it.
Policy SV11 – Important Views Policy SV12 - Dark Skies and Lighting	We strongly support this policy. We strongly support this policy. The dark skies status forms an important constituent part of the special qualities of the AONB. The AONB Management Plan 2019-2024 supports the policy stance taken here. Policy DP8 in the Management Plan supports the objectives of this policy.

Shiplake Neighbourhood Plan - Comments post regulation 14 Consultation (May 2021)

Dear Shiplake Neighbourhood Plan Steering Group

The Chilterns Conservation Board (CCB) is grateful for the opportunity to submit supplementary comments on the Regulation 14 Pre-Submission Consultation Draft of the Shiplake Neighbourhood Plan (NP) and following the close of consultation.

I.0. Summary of CCB's Strategic Support for the Neighbourhood Plan.

1.1. The CCB commends the vision and spatial strategy in the plan and the early engagement with us ahead of the formal submission of the plan.

1.2. In summary of our position, the CCB agrees with and supports the policy and supporting text that establishes valued landscape status / AONB settings status for the land within the Neighbourhood Plan area. An updated report has been produced, **Shiplake Parish Landscape Character Assessments and analysis of the Open land within the parish outside the built-up area of Lower Shiplake and Shiplake Cross** (24th Jan 2020 version). This is linked to and in alignment with the SODC Landscape Character Assessment evidence that underpins the recently adopted SODC Local Plan 2020, a matter of importance when considering the basic conditions tests for a Neighbourhood Plan. It provides for a comprehensive base for evidence in supporting NP landscape and design policies and is of greater detail and finer grain than the SODC Landscape Character Assessment.

1.3. The 24th Jan 2020 study is also nuanced and precise, in that it focuses the attribution of valued landscape status and an AONB settings relationship, within specific character locations and commendably avoids a blanket approach. At its **3.22** the CCB supports the analysis of a perceptual / aesthetic landscape. At **3.28**, we support the points made on landscape character and then on visual impact.

1.4. The 24th Jan 2020 study deals with the settings relationship and states that, (4.10) Although only a small part of the Study Area falls within the AONB, the above shows that the Study Area falls within the setting of the AONB. This is supported by the Chiltern Conservation Area in their submissions to Natural England for inclusion of the Study Area within an extension to the AONB. Guidance within the Chiltern Management Plan 2019-2024 sets out the protection to be given to the setting of the AONB and the approach to be taken in the CCB Position Statement Development affecting the setting of the Chilterns AONB 2011.

The CCB supports and commends this finding. The Parish falls within the area of review as originally promoted by the CCB to Natural England. Notwithstanding this as a matter for future progression, the study's recommendation on setting is consistent with and supported by our own position statement on the setting of the AONB.

The Relevant Land Management / Development Considerations from South Oxfordshire Landscape Character Assessment 2017 records the point that 'Valued landscape **PLCA1** River Thames Meadows and Terraces is regarded as a valued landscape for a number of reasons as set out below: • It makes an important contribution to the landscape and visual setting of the Chilterns AONB; • It makes an important contribution to the landscape setting of the River Thames; • It contains many landscape features of value in their right – as set out above; and • It is set well above an 'ordinary' countryside'. **The CCB supports this**.

Looking at the specific landscape character assessments, **CCB specifically endorses** the following as they are pertinent to the duties and responsibilities of the Chilterns Conservation Board.

PLCA2 Shiplake Woods is regarded as a valued landscape for a number of reasons as set out below: • It is within the Chilterns AONB, a landscape of the highest value; and • It is a landscape feature of value in its right

PLCA3 The overall semi-enclosed dipslope character of PLCA3 is extensive throughout the Chilterns AONB (see SODC LCA), although little of this landscape type is found along the Thames Valley and Fringes outside Shiplake Parish. As such it represents a rare example of where this AONB landscape type extends down into the Thames Valley and creates a pastoral, rather than wooded setting, to the river landscape.

PLCA3 Shiplake Semi-enclosed Dipslopes is regarded as a valued landscape for a number of reasons as set out below: • It makes an important contribution to the landscape and visual setting of the Chilterns AONB; • It makes an important contribution to the landscape setting of the River Thames; • It contains many landscape features of value in their right – as set out above; and • It is well above an 'ordinary' countryside.

PLCA4 The key features of PLCA4 are as follows: A strong rural character with limited views of the settlement edge of Shiplake Cross and limited views of the buildings within Lower Shiplake; a sense of elevation with long views to the east and south east and across the Thames River valley to the wooded Bowsey Hill; open rural settings of the farmsteads Shiplake Farm and Haileywood Farm; and the open rural approach to Shiplake Cross along the Henley Road, Memorial Avenue and Plough Lane. This is an open landscape with strong visual and landscape links to the adjacent Chilterns AONB, with Shiplake Woods (located within the AONB) visually prominent throughout the northern section. Within the adjacent area of the Chilterns AONB, the landform of dry valleys and open slopes (typical of the AONB) continue within this PCLA4

We support the **proposed landscape buffers**. This manifests as landscape scale enhancement within the setting of the AONB and this serves to enhance the relationship between the Chilterns nationally protected landscape in the AONB and the River Thames landscapes. Such an approach would be supported by the CROW Act 2000 section 85, in delivering the conservation and enhancement of the AONB by virtue of improving its wider setting and, therefore, the impacts upon the AONB.

We very much support the point in conclusions at **6.22** that, 'The three Landscape Buffers therefore form an interlinked landscape of high value, intrinsic beauty and distinctive character, contributing to the setting of the AONB and that of a rural section of this River Thames.

In the Stroud legal judgment 'detailed consideration was given to the nature of a valued landscape, which is dealt with but not defined in the National Planning Policy Framework. Mr Justice Ouseley had no issue with the previous planning inspectors conclusion that demonstrable physical attributes need to be shown rather than just popularity, when considering what constituted a valued landscape. Mr Justice Ouseley said 'It is not difficult to see that the sort of demonstrable physical attributes which would take this site beyond mere countryside... but into something below that which was designated'. In a 2017 planning appeal decision at Funton Brickworks, Kent for 55 dwellings, the Inspector deemed the area in which the site was located was a valued landscape for the purposes of Paragraph 109 of the Framework because the site is designated as an Area of High Landscape Value (reference APP/V2255/W/16/3146393, Feb 2017).

The status of any land previously denoted as an area of great landscape value (AGLV) within earlier SODC Local Plans reinforces the fact that this landscape enjoys special features that elevate it beyond *'mere countryside*', to adopt the language used by Mr Justice Ouseley. The AGLV status was subsequently removed, as national planning policy discouraged local planning landscape designations. The (now deleted) Planning Policy Statement 7 at its paragraphs 24 and 25 considering such local protections *'exceptional'*. The 1992 SODC Rural Areas Local Plan was unequivocal that *'much of it is indistinguishable from the landscape within the AONB'* (Rural Areas Local Plan paragraph 5.28). The 2012 NPPF reverted national policy back to the previous position that Local Plans could designate local landscape quality (i.e. the inclusion of valued landscapes).

¹ Stroud DC v Secretary of State and Gladman Developments Limited [2015] EWHC 488 (Admin)

The Chilterns Conservation Board **strongly supports** the Shiplake Neighbourhood Plan in its recommendations that this land is protected in policy, with a combination of valued landscapes and landscapes that protect the setting of the AONB. **AONB Management Plan DP4** on setting also supports this stance. Our CCB Position Statement on Setting establishes that setting cannot be defined and will depend on case circumstances and therefore evidence and its analysis.

2.0. Detailed Policy Submissions.

2.1. To assist, we set out the duties and responsibilities of the CCB in Annex I, at the end of these representations. For ease of reference we have tabulated our points, with additional text as <u>underlined</u> or deleted text as 'strikeout' text. All **bold text** denotes existing policy or supporting text in the pre-submission Neighbourhood Plan.

Shiplake Neighbourhood Parish evidence	CCB points in support and justification of
base.	these amendments and/or additional details.
SHIPLAKE NEIGHBOURHOOD PLAN	We support this.
CORE OBJECTIVES 1. Conserve and enhance	
the essential rural character of the parish and its	The sensitivity study addresses and examines the
villages by growing the villages through small infill	special qualities of the land outside the AONB but
developments and individual houses that will form	within the Parish. Its conclusions are sound and
part of the established pattern of development,	evidence based.
allowing the villages to grow organically. preventing	
further creep or elongation of the villages into the	Core objective I could, therefore, refer to the
open countryside or the villages' green spaces is a	rural character being within the setting of the
fundamental aim of the new plan. (Source: Sections	AONB and a valued landscape.
4.3, 4.4, 4.5 of 2017 Survey Results Report)	·
6.4.3.	We realise that, with the adoption of the SODC
	Local Plan, that certain policy numbers and content
	will require updating. We know that will be in
	hand, prior to the formal submission.
6.4.6. The Chilterns AONB intersects with a small	We would say (i.e. to be definitive),
part of the north west corner of the Neighbourhood	
Plan Area where AONB designation extends to Upper	parts of the Plan area could be regarded as being <u>falls</u>
and Lower Hailey Wood. Although the majority of the	within the setting of the Chilterns AONB
rest of the Neighbourhood Plan area is separated	
from the AONB by parts of neighbouring Binfield	
Heath Parish and Harpsden Parish, parts of the Plan	
area could be regarded as being within the setting of	
the Chilterns AONB.	
6.4.17.	This deals with the NPPF at 172. Current (2021)
	amendments propose changes to include reference
	to the setting of the AONB. This may be a matter
	for inclusion in the formally submitted plan, once
	these amendments are confirmed.
6.4.28 . There are a number of key development and	Strongly supported.
visual guidance principles (which are illustrated on	0 7 ** FF * * * *
page 16 of the Character Appraisal): a) Resist any	
built features or development including modern	
boundary treatments (fences etc.) and vehicular	
access tracks due to impact on AONB; b) Maintain	
permissive footpaths (throughout and along eastern	
edge) links to Shiplake Cross and the wider Chilterns	
AONB. c) Maintain irregular eastern edge of	
woodland; d) Maintain negatile custern cuge of	
woods, e) Maintain open rural views to screened	
Lower Shiplake and beyond to the hills above	
Lower Shipiake and Devond to the mills above	

Wargrave due to impact on the setting of the AONB.	
6.4.30. It is considered to be a rare example of where this AONB landscape type extends down into the Thames Valley and creates a pastoral, rather than wooded setting, to the river landscape. There are a number of key development and visual guidance principles (which are illustrated on page 17 of the Character Appraisal): a) Maintain the open views of the river Thames corridor from the edge of the river terraces, in particular from Shiplake College; b) Avoid any development within the area that would impinge of the rural character of the views from Shiplake Woods and the open dipslopes eastwards over the area to the river corridor and hillsides to the east. c) Special regard to be had to the views from the edge of the Chilterns AONB;	Strongly supported.
Landscape Policy Principles 6.4.61. The	Strongly supported.
evidence from the parish survey of 2017 and the subsequently commissioned Landscape Character Assessment report has led to the need to draft a series of policies which reflect the Neighbourhood Plan Objectives whilst addressing the key matters to come out of the evidence that has been gathered. Dark Night Skies 6.4.36 . The Neighbourhood Plan area is characterised by a lack of street lighting and whilst certain parts of the area do have limited lighting (e.g. around the railway station and within the grounds of Shiplake College, as well as occasional lighting columns in parts of The Chestnuts, Mill Road, Nos 7-14 Memorial Avenue and Plowden Way) it is generally dark at night. The atmosphere and character remain tranquil and rural during the evenings. This adds to the feeling of 'remoteness' when passing through the Parish on the A4155	Strongly supported.
Reading Road or approaching from Shiplake Row. Policy SVI2 - Dark Skies and Lighting	Strongly supported.
	It may be deemed too onerous to say <i>a</i>) The installation of lighting is avoided; i.e. a wholesale or blanket approach. We recommend the stance taken in the AONB Management Plan 2019-2024, DP8 'Keep skies dark at night by only using light where and when needed. All lighting should be the minimun required and meet or exceed guidance for intrinsically dark zones. Avoid architectural designs that spill light out of large areas of glazing'.

The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of <u>CroW Act</u>).

The Chilterns Conservation Board is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB. It is made up of representatives nominated by the organisations listed in Appendix 1.

Should you require any further information please do not hesitate to contact me.

Yours sincerely,

Dr Michael Stubbs MRICS MRTPI Planning Advisor, on behalf of the Chilterns Conservation Board



The Chilterns Area of Outstanding Natural Beauty

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

Chilterns Conservation Board

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

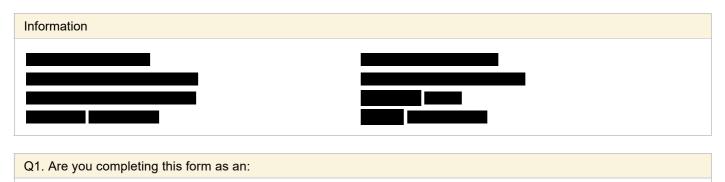
List of Organisations providing Nominees to the Chilterns AONB Conservation Board

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Buckinghamshire Council (formerly Aylesbury Vale, Chiltern and South Buckinghamshire, and Wycombe District Council).
- Dacorum Borough Council, North Hertfordshire DC, Three Rivers DC and South Oxfordshire DC.
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- DEFRA (8 in total).

Response 43

Respondent Details



Organisation

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email below from Historic England:

To whom it may concern:

Thank you for consulting Historic England on the submission version of the Shiplake Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment including advising on the conservation of heritage assets and champion good design in historic places. As such, our review of the plan is limited to those areas that fall within our remit and silence on other matters should not be treated as agreement or consent. This is without prejudice to comments we may make on individual planning or listed building consent applications that we may choose to comment on. I am happy to confirm that, having reviewed the plan, we do not have any comments to submit to the examiner. Please do not hesitate to contact me if you have any queries relating to our comments. Yours faithfully

Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email 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.

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Organisation representing (if relevant)	-
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Response 44

Respondent Details

Information			
Q1. Are you completing this form as an	:		
Agent			

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Ridge and Partners LLP on behalf of Victoria Land. Please see attachments.

Q3. You can upload supporting evidence here.

File: 2021-12-07 - 1 Ridge.pdf
 File: 2021-12-07 - 2 Ridge Appendix.pdf

Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email 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	-
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RIDGE

7th December 2021



South Oxfordshire District Council Planning Policy South and Vales Consultations

Sent via email only

Our Reference: 5017126

Dear Sir/Madam,

RESPONSE TO THE SHIPLAKE PRE-SUBMISSION NEIGHBOURHOOD PLAN CONSULTATION

This representation has been prepared by Ridge and Partners LLP on behalf of Victoria Land. The purpose of this representation is to respond to the pre-submission version of the Shiplake Neighbourhood Plan (SNP), and to assess its intention and the evidence base used to support its policies.

The Pre-submission Shiplake Neighbourhood Development Plan

The legal requirements for Neighbourhood Plans, and the related procedural obligations, are set out in the Town & Country Planning Act 1990 (as amended), the Planning and Compulsory Purchase Act 2004 (as amended) and the Neighbourhood Planning (General) Regulations 2012 (as amended).

Both the Neighbourhood Plan and the Basic Conditions Statement specify the period over which the Plan is to have effect, namely the period 2011-2035. This aligns with the dates covered by the South Oxfordshire Local Plan 2011-2035 (adopted December 2020).

This section questions whether the Shiplake Neighbourhood Plan (SNP) has been prepared in accordance with Section 15 of the Neighbourhood Planning (General) Regulations 2012, (as amended) and in general conformity with the strategic policies of the development plan so that it meets the basic conditional requirement.

For a neighbourhood plan to be put to a referendum and be made it must meet a set of basic conditions. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.



South Oxfordshire's approach towards development in the towns, villages, and the countryside

In order to support economic growth within South Oxfordshire, the adopted Local Plan (SODP) makes provision for the total housing need of between 14,500 and 16,500 homes over the twenty-year period 2011-2031. This would equate to an annual provision of between 725-825 new homes per annum. The 100,000-home target of the Growth Deal is based on the midpoint of this range (775 homes pa).

In order to plan for this housing requirement a settlement hierarchy is set out based on a village's sustainability credentials. The Local Plan assesses a range of criteria on employment opportunities, schools, health services, recreation and leisure opportunities and access to shops and public transport provision, to prepare a settlement assessment and hierarchy. Villages have been categorised as being either "Larger Villages", with a wide range of services and facilities in sustainable locations, or "Smaller Villages" that have a more limited range of services. The Neighbourhood Plan Area for Shiplake includes the settlements of Lower Shiplake and Shiplake Cross, both of which have been designated as 'Smaller Villages'.

Smaller Villages, as defined in the settlement hierarchy, have no defined requirement to contribute towards delivering additional housing (*beyond windfall and infill development*) to meet the overall housing requirement of South Oxfordshire.

Policy H16 of the Local Plan is designed to the effect that development within Smaller Villages should be limited to infill and the redevelopment of previously developed land or buildings. However, Policy H8 also allows Smaller Villages to produce neighbourhood development plans to allocate housing, with an expectation of 5% to 10% growth above the number of dwellings in 2011, minus any completions. This is considered to be an appropriate and proportionate approach towards development in the smaller villages.

The Local Plan specifies that 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. However, some parishes may still wish to proceed with preparing a Neighbourhood Development Plan, (for example to achieve the protection afforded by allocating housing to fund projects they want to deliver, or they would like to identify a specific type of housing bespoke to their village's needs). The Councils strategy therefore allows them to do so, provided that the levels of growth are commensurate to the size of the village.

It must also be noted that should these strategic policies be considered out of date, then this could have a detrimental impact for neighbourhood areas that are not planning for a specific need.

5-year Housing Land Supply Issues

A recent appeal decision was issued for a scheme on land at Lady Grove, Didcot, which lies within SODC. This appeal was allowed on 15th September 2021 and within paragraphs 7 to 19 the Inspector's conclusions on land supply for the period April 2021 to March 2026 were summarised. In short, the Inspector considered the housing supply to be roughly around 4.8 years and regarded the lack of 5-year supply as significant, which triggered the tilted balance as set out in paragraph 11 of the NPPF. Thus, the policies pertinent in the determination of this specific application were considered to be out of date.

This recent appeal is clear evidence that the Local Plan is currently **failing to deliver the required housing** to meet its needs. The Parish, in their omission of site allocations, are withdrawing from the opportunity to maintain a supply of housing. It is our concern that principal issues facing the NPA are not recognised or addressed in the pre-submission version of the plan.

It is our view that the SNP fails to address inequalities and to support the district in maintaining a healthy level of supply. The adopted SODP strategy will inflict a general decline in services and facilities, especially for 'Smaller Villages'. These concerns are heightened by the Parish's proposed strategy which adopts an inflexible approach to growth.

Any developments that have recently come forward in 'Smaller Villages' may have come forward via the 'market' speculatively. This means that it has been more challenging to coordinate infrastructure improvements and supporting services within these areas. One of the key issues with failing to allocate sites within the SNP, is that it relinquishes the Parish's ability to focus growth for infrastructure improvements.

Neighbourhood Development Strategy

The key core objectives of the SNP are acknowledged, especially the encouragement to allow the villages to grow organically. The aim to conserve and enhance the essential rural character of the parish and its villages by growing villages through small infill developments and individual houses is also noted.

Infill Development

Notwithstanding the above, since the adoption of the SODP in December 2020, there has been a different planning policy context that offers a more flexible approach to "infill" development. Greater flexibility has been afforded to encourage infill development as a mechanism for housing delivery.

With regards to the above, the definition established within the Local Plan reads as follows:

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"Infill development is defined as the filling of a small gap in an otherwise continuous built-up frontage or on other sites **within settlements where the site is closely surrounded by <u>buildings</u>**. The scale of infill should be appropriate to its location".

Despite the definition above, it appears that the SNP is looking to adopt an approach that is **not in general conformity** with the SODP's definition. The SNP under Policy SV1 emphasises that infill development can only come forward <u>within the built-up area of villages</u>. The definition in the SODC does not restrict infill to built up areas. Policy H16 **does not include reference to built up areas and permits infill within settlements**. In the case of the SNP, the settlements are Lower Shiplake and Shiplake Cross. We believe the SNP definition is more restrictive and **not in general conformity within the SODP definition** and should allow similar flexibility that meets the NPA's needs.

By adopting a definition in conformity with the SODP, the SNP are more likely to achieve a proportionate amount of growth as per Core Objective 1, which aims to '*…allow villages to grow organically preventing further creep prolongation of the villages into the open countryside or the villages' green spaces.* '. It is our view that a more restrictive definition not allocating sites would entirely limit the potential for the SNP to meet the requirements (as set out in the 2017 Neighbourhood Plan survey) **and, importantly, is not in general conformity with the adopted Local Plan**.

Affordable Housing

In addition to the above, the SNP fails to appreciate the significant issue of housing shortfall for the district and the need for affordable housing and related tenure types. The application of the tilted balance coupled with the needs of the neighbourhood plan area ("NPA") could represent a tilted balance in favour of speculative development.

This issue is highlighted by the NPA being located within two Lower Super Output Area ("LSOAs"). Both LSOAs register many scores within the least-deprived 20% of LSOAs across England including several domains within the least-deprived 10%. This reflects the NPA's relative affluence and is consistent with other similar indicators of affluence, such as levels of home ownership and car ownership.

Shiplake boasts typical traits of a LSOAs with geographical barriers. One of the key issues is the access to housing (inc. affordable housing). The SNP believes it addresses this, however there is no specific driver that enables development to meet these inequalities. By not taking a more localised approach and adopting a more stringent version to the current SODP policy in relation to infilling, the SNP is avoiding its responsibility in responding to the localised issues. As discussed previously, **the SODP's strategy is currently failing to maintain a five-year supply of housing.**

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As part of the Thames Farm appeal¹, the Inspector considered the affordability issues facing the District as a "serious concern". In applying the titled balance, the Inspector concluded that " the benefits of the proposed development would be the contribution it would make to partially redressing the significant and persistent shortage of housing land in the District and the serious shortage of affordable housing. As a matter of planning judgement, when assessed against the policies in the NPPF as a whole, the adverse consequences do not significantly and demonstrably outweigh the benefits of the proposed housing scheme, which is therefore sustainable development". It is our concern that the lack of affordability within the District and the NPA will lead to unwanted development. Thus, we posit that the SNP should respond to the issues highlighted within the Neighbourhood Plan Survey 2017 ("NPS").

In a separate appeal in Chinnor² an Inspector recognised the social benefits and regarded "the provision of market housing and the significant need for affordable housing, together with the increase choice of tenures, size, and mix, would constitute benefits". Furthermore, it was recognised that "greenfield sites are required to achieve housing targets so the development of a greenfield site would have a neutral impact [in the planning balance]".

The NPS represents a key evidence base document and could be considered out of date, particularly considering the impacts and turbulence in the housing markets from this date. It is our view that this housing survey should be updated to reflect more up-to-date needs.

The 2017 Neighbourhood Plan Survey represents a key evidence base document and could be considered out of date, particularly considering the impacts and turbulence in the housing markets from this date. It is our view that this housing survey should be updated to reflect more up-to-date needs.

Notwithstanding the above, the 2017 survey does reveal a significant demand for housing of mixed tenure and greater affordability. Importantly, 72% of people did not feel that there was adequate choice of housing types and size locally to meet their needs and detached private homes with three or fewer bedrooms representing the house types that were most in demand at 71%.

It is our view that the reliance on infill development to meet these needs is simply insufficient and proven ineffective, especially with the restrictive wording that has been applied.

The NPPF 2021 addresses the delivery of affordable housing both within, and on the edge of, settlements (paragraphs 64-67, 72 and 78). The Government's intention to deliver houses and address affordability is

¹ Appeal Decision: APP/Q3115/W/16/3161733

² Appeal Decision: APP/Q3115/W/17/3187058

apparent and is supported by a drive in housing delivery to 300,000 per annum. This is not reflected within the neighbourhood plan.

Policy SV5 aims to bring about a more balanced community by meeting the needs of those age and income groups who have difficulty in finding suitable homes in the villages by virtue of the size and type of accommodation currently available. This applies to new build residential proposals which contribute one or more net additional dwellings. However, with the only means for delivery being through a stringent infill policy, the SNP is not sufficient in its attempts to address the affordability issues of the district.

Housing Evidence Base

Appendix 3 to the Neighbourhood Plan contains an assessment and justification for the housing policies. It is apparent that the housing policies are underpinned by recent planning permissions, National, District and Housing Market Area data and Development Plan policies.

Core Objective 2 of the SNP deals with managing the community profile of the village by a) planning for new homes suited to young families and by b) enabling older residents to remain in the village and make their larger homes available to new residents by having a stock of available and suitable housing to which they may 'down-size.

Paragraph 5.3.2 suggests that Objective 2 has already been addressed as a result of the following recently permitted schemes:

- A. Erection of 95 dwellings on Thames Farm³, A4115 (outside of NPA)
- B. Conversion of existing buildings to provide 4 dwellings at Thames Farm⁴, A4115 (outside of NPA).
- C. Erection of 40 dwellings and B1, B2 and/or D1 floorspace at the former Wyevale Garden Centre⁵ (outside of NPA).
- D. Erection of 7 dwellings (net) at Mount Ida⁶, east of A4115 (within NPA).
- E. Erection of a 65-unit retirement village east of A4115⁷ (within NPA).
- F. Erection of 2 dwellings on land adjoining Tower House⁸, A4115 (within NPA).

³ LPA Ref.: P16/S0970/O

⁴ LPA Ref.: P17/S3119/FUL

⁵ LPA Ref.: P14/S3987/FUL

⁶ LPA Ref.: P16/S2861/O

⁷ LPA Ref.: P18/S3210/O

⁸ LPA Ref.: P18/S4323/FUL

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As illustrated from the above, the SNP relies upon a number of schemes that have been delivered **outside of its NPA** to provide justification for their stringent housing policies. These schemes total approximately 135 dwellings that should be discounted from the plan's justification/evidence base.

The planning consents at Mount Ida and Tower House deliver 10 open market houses (net gain of 9). Of these houses, eight are 4 and 5 bed homes, with only two plots at Mount Ida providing 2 bed homes. These schemes, therefore, do little to contribute to the need identified in Core O bjective 2, which the SNP claims to be planning for.

Furthermore, the 65-unit retirement village east of A4115 is considered a C2 use and establishes a care scheme with specific restrictions on occupation. These restrictions are based on the residents' level of care being assessed before purchase and an obligation to take on a minimum level of care each week. Due to the care requirement, this scheme is considered to provide specialist housing, which is not the same as open market, downsizer housing and does not contribute to the need identified in Core Objective 2, which the SNP claims to be planning for.

It is therefore inaccurate to suggest that Core Objective 2, to deliver small homes for younger families and downsizers, has been met, as none of the recent planning consents within the NPA are representative of the communities needs and Thames Farm and Wyevale are **not within the NPA**. **Thus, the housing need for Shiplake has not been met and will continue to be unmet if the SNP continues as currently drafted**.

The evidence base suggests that the SNP was originally drafted to allocate 33 units, which represents 5% growth over 15years. However, following the Thames Farm consent, the strategy was amended, and a more stringent approach to the NP was adopted. As detailed above, the Thames Farm scheme accounts for 95 dwellings *outside the Shiplake NPA* and therefore cannot be used as justification that the community's needs have already been met and that the SNP does not need to plan for further growth. Therefore, we propose that the SNP's strategy is revised and that at least a 5% growth requirement is reinstated into the plan.

As above, the SNP has used these examples as justification to not allocate housing developments within their area. This approach is flawed and does not account for the needs within the NPA. More specifically the SNP states "recently a large number (in excess of 200) of dwellings has been permitted since 2016 around the edges of the settlements at sites such as **Thames Farm**, Mount Ida, **former Wyevale Garden Centre**, etc". The two boldened schemes account for 135 units outside of the NPA and cannot be used to meet the NPA's needs.

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This is not representative of the area and should therefore be removed from the evidence base. It is our view that this galvanises the case for allowing a more flexible approach to infill development and/or allocating sites in order to provide the 5% - 10% growth that can be facilitated by sustainable villages.

Allocating Sites

The community have made clear that a scale of development that is, in their opinion, disproportionate to the size of the settlement, and far in excess of the growth scenario envisaged in the draft Local Plan ("...expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census (minus any completions since 1 April 2011" – extract from Local Plan 2011-2035 policy H8) has already been experienced.

However, as outlined previously, the evidence base and development that has been accounted for to support this approach is flawed and cannot be used as justification for limiting further growth.

The 2017 Survey shows that 47% of the responders were of the view that development should, if required, take place on the edge of the settlements. However, it is apparent that the SNP has ignored these responders and instead imposes stricter measures and unjustified evidence to support their housing needs strategy.

Principally, it is our concern that the Parish **could be vulnerable to unwanted development**, particularly as the tilted balance is engaged. To avoid this, it is suggested that the SNP allocate land for housing or offers flexibility towards sites that represent an infill opportunity where surrounded by buildings.

It is our concern that the SNP will miss the opportunity to provide key infrastructure benefits for the Parish through allocating land. The SNP has an opportunity to address the failures of the current strategy, and in doing so, the SNP **would offer a greater layer of protection from speculative developments.**

Paragraph 14 Implications

Paragraph 14 of the National Planning Policy Framework (NPPF) states that "In situations where the presumption (at paragraph 11d) applies, applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

"The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made.

• The neighbourhood plan contains policies and allocations to meet its identified housing requirement.

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- The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and
- The local planning authority's housing delivery was at least 45% of that required over the previous three years".

As the tilted balance is in effect in South Oxfordshire settlement are now **more vulnerable** to unwanted speculative development. In the context of NPPF paragraph 14 there is an opportunity for the NPA to gain greater protection from unplanned developments. However, the only way a Neighbourhood Plan can benefit from this extra protection under Paragraph 14 is if it contains policies and allocations to meet its identified housing requirement. Where the housing requirement is zero, a Neighbourhood Plan would have to exceed the housing requirement by allocating sites for development.

<u>Landscape</u>

A key focus for the SNP is represented under Core Objectives 1&3. These read as follows:

Objective 1

'Conserve and enhance the essential rural character of the Parish and its villages by growing the villages through small infill developments and individual houses that will form part of the established pattern of development, allowing the villages to grow organically preventing further creep into the open countryside or the villages green spaces, is a fundamental aim of the new plan.'

Objective 3

"Sustain the sensitive landscape setting of the villages and preserve and enhance the areas of natural landscape and agriculture existing between the villages whilst also conserving the existing network of trees, hedgerows, wetlands, public community spaces and rights of way so as to protect and enhance wildlife sites/habitats/bio-diversity".

The SNP Identifies 4 Parish Landscape Character Areas. Our main concern is in relation to the Landscape Character Area PCLA3: Shiplake Semi-enclosed Dipslopes (see figures 1 & 2 below) and we object to the inclusion of this character area as a valued landscape as set out in Policy SV9. The inclusion of this character area as a valued landscape only allows for development which is suited to a countryside location, thus excluding the provision of open market housing.

Paragraph 2.2 of The Kirkham Landscape Character Assessment January 2020, which forms the evidence base of the SNP identifies and describes 4No.Parish Landscape Character Areas, which exhibit

unique combinations of elements and features which make these landscape areas valued and distinctive.

As shown in figure 1 the PCLA3 character area falls within 3 areas:

- The main part separating the two settlements of Lower Shiplake and Shiplake Cross.
- Small area to the west of Shiplake Cross
- The land between Shiplake Farm and Shiplake Cross
- The SNP also further describes the location as being bordered by Lower Shiplake to the north east, the River Thames Meadows and terraces to the east and south east; and Shiplake Cross and the Shiplake Open Dipslopes to the west and south west. This character area falls outside the builtup area of Shiplake.
- As stated in the introduction The Landscape Character Assessment *'builds on published landscape character studies most notably the South Oxfordshire Landscape Character Assessment 2017'*.
- Figure 2 below (and figure 2 in the Character Assessment) shows that the original 2017 Landscape Assessment also characterised the majority of the built-up area (as defined in the SNP) within PCLA3 and did not exclude this area, as now illustrated in Figure 1.

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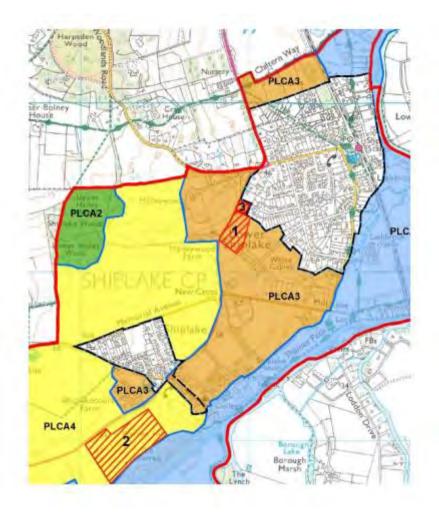


Figure 1: Shiplake Landscape Character Areas

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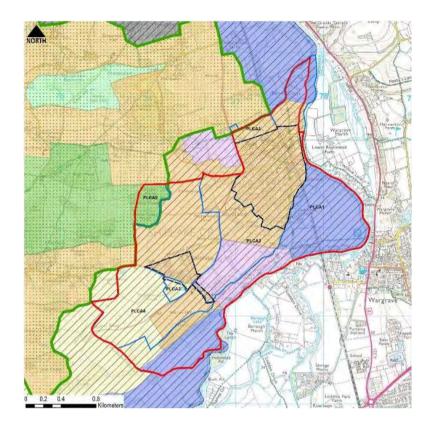


Figure 2: South Oxfordshire Landscape Character Areas and Types 2017

The exclusion of the built-up area in the latest Character Assessment is presumably to restrict the amount of land available for development, particularly when linked to the Infill policy as drafted. A significant amount of land within PLCA3 includes existing residential development. Whilst it may be at a lower density than the centre of the village, the characteristics of this residential location area is at odds with the adjacent open countryside. Of particular note are the areas of Lower Shiplake enclosed within the A4155 and New Road, New Road and Mill Lane and the land in Shiplake Cross between Shiplake Farm and Plough Lane.

The issue of valuable landscapes in Shiplake has previously been reviewed by Inspectors as part of appeal decisions for the Retirement Villages site (ref APP/Q3155/W/19/3220425), Thames Farm (APP/Q3155/W/16/3161733) and Tower House (APP/Q3155/W/19/3229352). The Retirement Villages scheme is located to the south of Lower Shiplake on the east of the A4155 and was previously undeveloped land. The Inspector notes that the 2017 Landscape Character Assessment identifies a '...differentiation between land to the west of the A4155, which has medium scaled fields and predominantly rural character and by inference less urban influences'. The character of land to the east of the A4155 is unmanaged fields, enclosed with mature trees and hedge vegetation. Much of the land

to the east of the A4155 is enclosed with boundary vegetation with limited intervisibility from medium and longer views from all surrounding directions.

The Inspector goes onto refer to the Thames Farm appeal in his findings. The large detached properties along (amongst others) Mill Lane and New Road result in a 'developed countryside' characteristic, recognising the distinction between the more rural larger field patterns to the west of the A4155, with areas that are strongly affected by urban influences.

The site at Tower House is located to the east of the A4155, adjacent to the retirement villages scheme and is located within PLCA3 within the SNP. As part of the appeal for 2 houses, the Inspector stated that the site is not valued landscape. He also references nearby urbanising influences and the main A4155, which means that any development would not detract from the wider character an appear ance.

Objectives 1&3 are concerned with the protection of open countryside as well as the landscape setting and character of the villages. Given the above comments from 3 different appeal inspectors, plus the inclusion of the built up area of Shiplake (as defined by the SNP) within PLCA3, we argue that the whole of this character area should not be considered as valued landscape, with the protection afforded to it by policy SV9. There are clear urbanising features within the areas of Mill Lane, A4155 and New Road. This part of the village is not open countryside and the exclusion of these areas from policy SV9 would not prevent Objectives 1 & 3 being met.

Furthermore, the exclusion of these areas from Policy SV9 would not prevent the separation of the settlements. Policy SV8a could still be achieved. The Inspector for the Retirement Villages scheme noted that the dispersed development at the cross roads of A4155 and Mill Lane already provide development in the intervening area between Shiplake and Lower Shiplake. Therefore, the development would not harm the separation of settlements. The same could therefore, be said of any further development of land in this location.

Policy SV11 is designed to protect important views across the NPA. None of the views listed in the policy within PLCA3 would be affected by the exclusion of the areas mentioned above from Policy SV9. We would also suggest that the views at point 6 from Shiplake Woods to the river corridors are not possible due to the enclosed nature of the land in these locations. These viewpoints are also not included as key views in figure 7 of the Landscape Character Assessment.

Land at Plough Lane

The Landscape Appraisal refers to a small area that lies to the west of Shiplake Cross and includes Shiplake Farm and the land between this farm and Shiplake Cross. The land between the farm and Shiplake Cross is known as "Land at Plough Lane".

It is our concern that this parcel of land has been specifically captured within this land to avoid being considered for development as an infill plot of land. Particularly given that it is heavily influenced and characterised by surrounding built form on three sides and the A4115 along its south-eastern boundary.

It is considered that the Land at Plough Lane does not contribute toward the 'usual' characteristics held within the Shiplake Semi-enclosed Dipslopes. Unequivocally, it imposes a further level of stringency in the neighbourhood plan approach, limiting the plan's ability to meet its needs.

More specific emphasis has been provided on the Land at Plough Lane within the Landscape Character assessment. It is argued that this land retains its rural character despite the proximity of Shiplake Cross, contributing to the rural setting and main approach to Shiplake Cross. The openness of this parcel of land contributes to the rural setting, typical of the AONB. This is simply not the case.

As illustrated below, the land referred to as "rural character" and open is simply implausible. It is heavily influenced by residential uses and other adjacent built form. This land is not being used for agricultural land and offers an extremely limited contribution to the PLCA3. This contribution is further limited by the exposure to the A4115 and the multiply residential uses adjacent to three of its boundaries.

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Figure 2: Land at Plough Lane in Context

It is considered important that the landscape policies set out in the SNP are not supported by restrictive policies to prevent sustainable development coming forward, particularly those that can meet the specific needs for the community. Imposing a blanket restriction on certain areas can only prejudice sustainable opportunities, fuelling the issues of delivering housing and addressing affordability.

<u>Summary</u>

This representation has been prepared by Ridge and Partners LLP on behalf of Victoria Land in relation to the Shiplake Neighbourhood Plan Pre-submission consultation.

This representation questions the intention and supporting evidence base of the SNP. Particularly in relation to delivering housing growth and the landscape character assessment.

In summary, we consider that the SNP applies stringent measures to try and restrict development and the policy proposed is not in accordance with the 'infill' definition set out SODP. Furthermore, the

approach set out within the Local Plan is currently failing by not being able demonstrate a five-year supply of housing. This is alarming particularly given that the development plan was only adopted in December 2020. **This exposes certain areas to unplanned development.**

Therefore, we consider that the SNP should allocate land for residential development and/or adopt a more flexible approach to infill development. In adopting the same approach as the Local Plan, the neighbourhood plan is essentially looking to adopt an unsuccessful strategy. **Through allocating land, the SNP would ensure the vitality of the NPA, respond to local needs and support the district in meeting its housing need.**

Therefore, it is argued that the SNP allocates sites for housing in order to meet its core objectives and the needs of the area. Also, the need for affordable housing and specific house types is apparent and not represented within the nieghbourhood plan and this can also be addressed through the provision of suitable allocations within the NPA.

Finally, and in light of the above argument, it is requested that the SNP is revised to include sites that are considered available, deliverable and achievable, as per Annex 2 of the NPPF. For this reason, we present "Land at Plough Lane" in **Appendix 1**.

Please do not hesitate to contact me should you require further information or should you wish to discuss the contents of this representation further.

Yours sincerely,

Giles Brockbank MRTPI Partner For Ridge and Partners LLP



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RESPONSE TO THE SHIPLAKE PRE-SUBMISSION NEIGHBOURHOOD PLAN CONSULTATION

FOR LAND AT PLOUGH LANE PREPARED FOR



December 2021

RESPONSE TO THE SHIPLAKE PRE-SUBMISSION NEIGHBOURHOOD PLAN CONSULTATION: FOR LAND AT PLOUGH LANE

Prepared for



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- 1. INTRODUCTION Statement Structure
- 2. PROMOTION: LAND AT PLOUGH LANE
- 3. SUMMARY AND CONCLUSION

Appendix 1a: Site Location Plan.

1. INTRODUCTION

- 1.1. This Statement has been prepared to support representations made by Ridge and Partners LLP on behalf of Victoria Land. The purpose of this representation is to respond to the presubmission version of the Shiplake Neighbourhood Plan (SNP). It also promotes land that has potential to deliver housing for the Parish and the District as a whole.
- 1.2. As part of this consultation response, we have assessed the sites deliverability and suitable for residential development. This sets out why land described as 'Land at Plough Lane' is suitable for residential development and should be included as an allocation within the Shiplake Neighbourhood Plan.
- 1.3. For context, a copy of the proposed site location plan can be found at Appendix 1a.

2. PROMOTION: LAND AT PLOUGH LANE

2.1 Due to the contents held within this representation, we would like to present Land at Plough Lane as a potential allocation for the Shiplake Neighbourhood Plan.

SITE AND BACKGROUND CONTEXT

Site Location

- 2.2 The site itself is located to immediately south of Shiplake, to the south of "Plough Lane" and to the west of Henley Road (A4155). It is located towards to the western part of Shiplake and in the centre of the Shiplake Neighbourhood Plan area. Shiplake Farmstead abutting the southern boundary. The site comprises circa. 2.4 hectares of agricultural land and is void of any built form or significant vegetation.
- 2.3 The site is bound by existing built form to the north, east, south, and west with access considered achievable from the A4115 and Plough Lane. Therefore, considered to be within the built-up limits of the settlement and considered an infill opportunity.

Designations

- 2.4 The site is not located within a landscape designation, nor is it located within an area prone to flooding. According to the Environment Agency flood mapping the site is locating in Flood Zone 1 which is at the lowest risk of flooding.
- 2.5 The nearest listed buildings within the vicinity of the site are located approximately 295 metres in and around the Shiplake College. These consist of six Grade II listings and one Grade II* listed building.
- 2.6 There are no public rights of way passing through the site. Although there is a footpath running along the north-western boundary (Ref. Shiplake FP10). Figure 1 below illustrates the connectivity by Public Rights of Way to Binfield Health Club.



Figure 1 – Public Rights of Way

<u>Planning History</u>

2.7 From reviewing the Council's planning record there is no history of relevance to the site.

3 PLANNING POLICY CONTEXT

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 In this case, the Development Plan documents of relevance to the application comprises:
 - South Oxfordshire District Plan.
- 3.3 Other Material Considerations of relevance to the determination of the application include the National Planning Policy Framework (NPPF).
- 3.4 The Development Plan policies most relevant to the application are firstly outlined below.

South Oxfordshire District Council (SODC) Local Plan 2035

- 3.5 The South Oxfordshire Local Plan 2011-2035 was formally adopted by the Council on 10th December 2020. The relevant policies for this representation are:
 - DES1 Delivering High Quality Development
 - DES2 Enhancing Local Character
 - DES8 Promoting Sustainable Design
 - H1 Delivering New Homes
 - H8 Housing in the Smaller Villages
 - H16 Backland and Infill Development and Redevelopment
 - STRAT1 The Overall Strategy
 - STRAT5 Residential Densities

Material Considerations

The National Planning Policy Framework (July 2021)

3.6 **Paragraph 7** is clear that the purpose of the planning system is to contribute to sustainable development. Furthermore, at **Paragraph 8**, to achieve sustainable development means

that the planning system has three overarching objectives: economic, social, and environmental.

- 3.7 To deliver these objectives, **Paragraph 9** sets out 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 reflects the character, needs and opportunities of each area.
- 3.8 **Paragraph 10** is clear that so sustainable development is pursed in a positive way, at the heart of the framework is a presumption in favour of sustainable development.
- 3.9 Of particular relevance is **paragraph 11**, which sets out the presumption in favour of sustainable development. This notes that where relevant development plans policies are out-of-date, planning permission should be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NNPF taken as whole.
- 3.10 The Council's policies which are the most important for determining planning applications are out of date as a result of the shortfall in housing land supply as detailed in Paragraphs 2.18-2.25 of this statement and reflecting the conclusions of the Lady Grove Inspector.
- 3.11 **Paragraph 60** is clear that the Government's objective of significantly boosting the supply of homes. Therefore, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 3.12 **Paragraph 69** states small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 3.13 In respect of rural housing **Paragraph 79** sets out that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.
- 3.14 **Paragraph 81** sets out that planning policies and decision should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local

business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

- 3.15 **Chapter 8** supports the promotion of healthy and safe communities. **Paragraph 92** sets out that planning policies and decision should achieve healthy, inclusive and safe places.
- 3.16 **Paragraph 105** states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 3.17 **Paragraph 110** sets out that when assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
 - a) appropriate opportunities to promote sustainable transport modes can be or have been – taken up, given the type of development and its location.
 - b) safe and suitable access to the site can be achieved for all users.
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 3.18 **Paragraph 111** states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 3.19 **Paragraph 122** states that planning policies need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.

- 3.20 **Paragraph 124** states planning policies and decisions should support development that makes efficient use of land, taking into account:
 - a) "the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and health places."
- 3.21 **Annex 2** of the Framework defines 'deliverable' as "sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.".

4 SUITABILITY OF THE SITE FOR DEVELOPMENT

4.1 The previous section of this representation has identified all relevant planning policies and national planning policy and guidance that are appropriate for assessing the sites suitability for residential development, alongside green infrastructure and landscaping.

Location of Development

- 4.2 It is felt that this is a location that offers an infill opportunity for Shiplake and provides the opportunity to grow and support local services and facilities, particularly as it is surrounded by existing built form and is close to a number of key facilities and services.
- 4.3 As, forementioned, the village of Shiplake is undoubtedly well connected to key settlements (i.e., Henley-on-Thames, which is allocated as a Market Town and a Strategic Location with the SODP) within the district and afar and boasts a number of key services and facilities.
- 4.4 The site comprises approximately 2.4 hectares of agricultural land, of which is being promoted for residential use. We consider that a proportionate number of residential units can be delivered onsite. The anticipated number to be delivered is subject to technical work that will be undertaken to ensure all other relevant planning policies are considered. In considering the site constraints, we consider the site as suitable for delivering circa 20-30 dwellings.
- 4.5 The strategic approach to development in Smaller Villages assumes that there is a lack of services in Smaller Villages, however for Shiplake this is simply not the case. The issues facing settlements like Shiplake has been challenged by the Taylor Review, The Affordable Rural Housing Commission and academics. Principally it looked at how these assumptions can negatively impact house prices/affordability, social cohesion and economic performance. It is our concern at these assumptions have been placed on Shiplake and the proposed SNP strategy aggravates the key issues facing Shiplake.
- 4.6 We consider that the Site is sustainably positioned to accommodate some growth for the district.

Surrounding Area

2.8 The SNP recognises that unlike many rural villages, the parish boasts many amenities including two pubs (the Plowden Arms is due to re-open in spring 2022), a shop, a post office, a butcher, a garage, a church, a primary school, a nursery and good bus and rail links.

Most of the commercial premises are located in Lower Shiplake, whereas a village hall, playing fields, Primary school, The Plough, Shiplake College and church are located in Shiplake Cross a short walk from the site.

- 2.9 High Wycombe is located approximately six miles to the south west of the village and is accessible by public transport via the number 800 Reading/High Wycombe Bus Service. Henley-on-Thames is a market town and accessible by this bus service and is considered to be a strategic growth point within the SODP.
- 2.10 Henley-on-Thames is approximately 3-miles (or a 19-minute bus journey from the site. As a market town, it has a population of around 11,600 and represents an important service centre for nearby areas in South Oxfordshire and Berkshire. Henley-on-Thames's shopping centre is the largest of SODC's market towns with a good range of shops and services to serve local residents and visitors alike. Tourism, based on the town's riverside setting, its legacy of historic buildings and the festivals and events that take place, are important to the economy and vitality of Henley-on-Thames.

<u>Accessibility</u>

- 2.11 Access to the site is considered achievable from Henley Road and/or Plough Lane. The current access is an agricultural unadopted highway via Plough Lane.
- 2.12 More widely, the site is relatively well-connected and central to the larger settlements of Henley on Thames, Reading and High Wycombe.
- 2.13 The closest existing bus stops to the site are to the north west on Plough Lane. These bus stops benefit from its own bus shelter and is found on a 20-mph road adjacent to the Primary School. These stops marked as 'Primary School' provide access to the number 800 bus services (see Figure 2 below). The number 800 bus service operates between Reading and High Wycombe via Dunsden Green, Binfield, Henley-on-Thames, Fawley, Danesfield Thames and Marlow.
- 2.14 It is approximately that the 800-bus service takes 19minutes from the site to Henley-on-Thames and is frequently serviced, every 40-minutes.
- 2.15 Furthermore, the service provides seventeen opportunities to head south-westbound towards Reading and nineteen opportunities to head north-eastbound towards High Wycombe on a week daily basis. The bus stops are connected to the proposed allocation

by footways on Plough Lane and provide access to key settlements and local centres for employment, retail, and leisure.

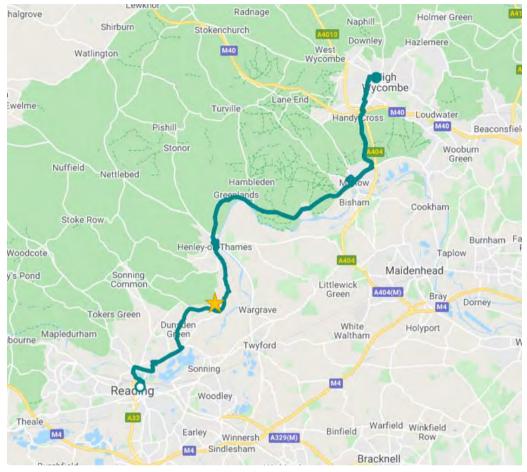


Figure 2 – Bus Service Route (Yellow Star = Site's Location)

Residential Development

- 4.7 It is thought that greater needs for housing will add to the demand/supply pressures within settlements such as Shiplake and the opportunity to adopt a plan with a proposed allocation offers the prospect of managing their growth proportionately.
- 4.8 Development proposals at the Site will provide some much-needed homes that will contribute towards alleviating affordability issues in the area. It is felt that growth in Shiplake, through a specific allocation, can offer a valid and sustainable approach to accommodating the districts growth and meeting actual housing needs. It is well established in the Framework at Paragraph 79 that housing should be located where it will enhance or maintain the vitality of rural communities. This is echoed in the new PPG on rural housing. Equally, Paragraph 69 of the Framework makes clear that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built up relatively quickly.

- 4.9 Furthermore, affordable housing within this area is considered to retain and attract the younger population which means existing settlements and their services are more likely to be sustained and enhanced, securing the sustainability and vitality of rural areas.
- 4.10 Overall, the provision of housing, including affordable housing, will have a significant benefit on the community of Shiplake and its wider area.

Agricultural Land

- 4.11 The site comprises Grade 3 agricultural land. Paragraph 170 of the Framework seeks to protect against the loss of the best and most versatile agricultural land, and Paragraph 171 (footnote 53) states where 'significant development' occurs, there should be justification for this.
- 4.12 Local planning authorities are not required to consult DEFRA on the loss of 'Best and Most Versatile' land unless a threshold of 20 hectares and above is reached. In this case, 2.4 hectares of 'good to moderate quality agriculture land' is proposed to be removed. We are of the view that such removal is outweighed by the substantial benefits that this development would provide.

Flood Risk

4.13 The site lies within Flood Zone 1, and therefore is at minimal risk of flooding from any nearby fluvial sources, or from local drainage infrastructure. Therefore, development on this land would be consistent with the SODP and Paragraphs 159-169 of the NPPF.

Highways and Access

- 4.14 The current access is an unadopted highway and is owned by the client. It is also proposed that access could be granted through Plough Lane or the A4115. Overall, it is considered safe and suitable access can be achieved, complying with Paragraph 111 of the NPPF.
- 4.15 New footpaths can be incorporated into the site, providing a safe and easy walk to the school and other services and facilities. In addition, as demonstrated above, the closest bus stops are found to the north-west of the Site along Plough Lane. As detailed previously the number 800 bus service provides a sustainable transport option towards a number of settlements. Therefore, access to the extensive range of leisure, retail and employment services can be achieved via sustainable modes of transport.

- 4.16 More widely, the site is also considered to integrate well within the existing transport network given its location amongst key strategic roads and it is considered allocating the site for residential development will not cause a significant adverse cumulative impact on the highway network.
- 4.17 With the above in mind, it is considered allocating the site for residential will seek to encourage active travel modes and public transport. Further, its allocation is not considered to cause an unacceptable impact on highway safety, nor will it cause severe residual impacts on the highway network, in accordance with Paragraph 110 of the NPPF.

SUSTAINABLE DEVELOPMENT

- 4.18 The presumption in favour of sustainable development sits at the heart of the Framework under Paragraph 10. To achieve this, three objectives are set out in Paragraph 8:
 - Social Objective;
 - Economic Objective; and
 - Environmental Objective.
- 4.19 The following demonstrates how development at this site would meet those objectives.

<u>Economic</u>

- 4.20 The development of housing growth and investment into the housing sector brings significant growth to the construction industry. With reference to the "Laying the Foundations: A Housing Strategy for England. HM Government" every £1 million received from new housing development supports 12 net jobs (seven direct and five indirect) for a year, as well as apprenticeship opportunities. A more responsive housing market can play a major role in delivering local economic growth, with housing construction, repairs and maintenance having a direct impact on economic output, accounting for an average 3% of GDP. This would bring prosperity and growth to the local economy.
- 4.21 A well-functioning housing market is therefore vital to the Country's competitiveness and attractiveness to business, which will drive the economic growth the country needs. The availability of housing in the right places and at the right time will therefore bring economic prosperity to areas, supporting the economic dimension to sustainable development.

4.22 Evidently, the site will deliver major financial benefits to the NPA and district, providing vitality to Shiplake. In addition, contributing towards building a strong, responsive and competitive economy, delivering major economic benefits.

<u>Social</u>

- 4.23 The delivery of this site has the potential to supply housing to meet needs of present and future generations, a key principle within the Framework. As such, the site would deliver a mix of housing that would contribute towards meeting both the district's identified housing need and the specific needs of the Shiplake NPA.
- 4.24 As part of delivering a policy compliant housing mix, allocating the site for residential development will provide the opportunity to cater for those who are in need of affordable housing, consequently reducing the rate of those that are on housing registers and addressing the high affordability ratio (when assessed against the national average).
- 4.25 The future residents of the site will contribute towards the local communities, and services and facilities that exist within the SNP, surrounding settlements and the district. Moreover, developer contributions made through a S106 agreement/Community Infrastructure Levy will enhance existing recreation and community facilities.
- 4.26 Furthermore, the residential development in this location would provide opportunity for rural farmers and those involved in rural businesses to reside in the local area. As such, the development proposal will contribute towards a more balanced community, thereafter, sustaining and enhancing community cohesion in the local area, meeting the social objective of sustainable development.
- 4.27 This site therefore has the potential to deliver significant social benefits.

<u>Environmental</u>

- 4.28 The development of the site and its proposed uses provide ample opportunity to conserve and enhance the site's location within the built-up area. It is considered that through careful and high-quality design and with suitable soft landscaping will provide an overall enhancement to the landscape and area as a whole.
- 4.29 As development forms part of the setting of the site, it is considered allocating this site for development would not cause any harm to the characteristics and qualities of the wider landscape.

4.30 As such, development in this location would constitute sustainable development.

5 **DELIVERABILITY**

- 5.1 Paragraph 60 of the Framework states, "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed" and "that the needs of groups with specific housing requirements are addressed."
- 5.2 Paragraph 68 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing and employment land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - a) "Specific, deliverable sites for years one to five of the plan period; and
 - b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."
- 5.3 Annex 2 within the Framework defines 'deliverable' as the following:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

5.4 This representation has demonstrated the deliverability of the site as per the definition above.

Available

5.5 The site currently comprises agricultural land. It is being actively promoted by the landowner. There are no significant constraints which would prevent the site coming forward in a timely manner or limit development. The site can, therefore, be considered to be developable and available.

Suitable

5.6 The site has no physical constraints that would prevent or delay development coming forward. The site is suitably and sustainably located for residential development, having good accessibility to existing services and facilities via sustainable modes of transport and key highway infrastructure. Accordingly, the Site is clearly a suitable location for development.

6 SUMMARY AND CONCLUSION

- 6.1 This representation has been prepared by Ridge and Partners LLP on behalf of Victoria Land in relation to the Shiplake Neighbourhood Plan Pre-submission consultation. This document sets out why 'Land at Plough Lane' in Shiplake is suitable for residential use.
- 6.2 This Statement sets out in Section 3 how the site is in a suitable location for future residential development. There are no known constraints which would prevent development taking place on the site. Additionally, the allocation of residential development would contribute to NPPF's definition of sustainable development.
- 6.3 In accordance with Paragraph 68 of the Framework, it has been demonstrated this site is deliverable by being available immediately for development, suitable in terms of location and accessibility, and achievable.
- 6.4 In light of the above, it is requested that the subject site is considered favourably for development.

Appendix 1a



Land at Plough Lane, Shiplake







www.ridge.co.uk

Response 45

Respondent Details

Information	
Q1. Are you completing this form as an:	
Agent	

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Savills on behalf of Thames Water. Please see attachment.

Q3. You can upload supporting evidence here.

• File: 2021-12-07 - Thames Water.pdf

Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email 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.

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Sent by email: <u>planning.policy@southandvale.gov.uk</u>

thameswaterplanningpolicy@savills.com

7th December 2021

South Oxfordshire District Council – Shiplake Neighbourhood Development Plan

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewage undertaker for the South Oxfordshire area and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012. Thames have the following comments on the Neighbourhood Plan:

Water and Wastewater Infrastructure Delivery

The way water and wastewater infrastructure will be delivered has changed. Since the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

It is important not to under estimate the time required to deliver necessary infrastructure. For example to understand, design, and deliver local network upgrades can take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to 10 years.

Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. In some circumstances it may be necessary to phase development in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land, and water courses and / or issues with water supply in the form of no or low water pressure. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.

Water and Wastewater Infrastructure

Thames Water support the inclusion of a link to its pre-planning services at paragraph 6.5.60 and 6.5.61.

We hope this is of assistance. If you have any questions please do not hesitate to contact Thames Water on the above number.

Yours sincerely,

Thames Water Utilities Ltd

Response 46

Respondent Details



Organisation

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Oxfordshire County Council. Please see attachment.

Q3. You can upload supporting evidence here.

• File: 2021-12-07 - Oxfordshire County Council.pdf

Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email 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.

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Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified



OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

District: South Oxfordshire

Consultation: Shiplake Neighbourhood Plan 2011 – 2035 (Submission Document)

This report sets out Oxfordshire County Council's view on the Shiplake Neighbourhood Plan 2011 – 2035 (Submission Document)

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

The County Council supports in principle the ambition of Shiplake Parish Council to adopt a Neighbourhood Plan. We understand these comments will be forwarded to an independent examiner.

We note, this submission neighbourhood plan does not allocate any sites for development but allows for infill development and rural exceptions sites (Policy SV1 *Infill development*, Policy SV2 *Rural Housing* and Policy SV3 *Conversion of Buildings in the Countryside*).

Consistent with Local Plan Policy H16, policy SV1 *Infill Development* supports infill development and redevelopment of previously developed land within the built up parts of the villages. Figure 14 shows the built-up areas of Shiplake Cross and Lower Shiplake, this might be helpful to refer to in the supporting text to policy SV1 *Infill Development*.

We request to be kept informed of any decisions on this neighbourhood plan.

Detailed officer comments, which include some amendments with respect to transport and archaeology, are set out in Annex 1.

Officer's Name: Sarah Steere-Smith Officer's Title: Planner Date: 30 November 2021

ANNEX 1

OFFICER ADVICE

District: South Oxfordshire Consultation: Shiplake Neighbourhood Plan 2011 – 2035 (Submission Document) Team: South &b Vale Infrastructure Locality Officer's Name: Edward Masterson-Cox Officer's Title: Transport Planner Date: November 2021

Transport Comments

<u>6.5.2. (page 61)</u>

- The South Oxfordshire Local Plan (2011-2035) should be named as such for clarity. (Full reference is indeed available in Appendix A, but the inclusion of the district's name makes for easier reading).
- Similarly, the two policies referenced should be named correctly: TRANS2 Promoting Sustainable Transport & Accessibility, and TRANS5 Consideration of Development Proposals.

6.5.11. (page 62)

Possible additional wording to futureproof could be as follows:

Were suitable conditions to arise which would facilitate the cycle path to Henley-on-Thames, then this would be supported by Shiplake Parish.

<u>6.5.15. (page 62)</u>

Parking enforcement in South Oxfordshire, as of 1st November 2021, is no longer the responsibility of Thames Valley Police but of Oxfordshire County Council.

https://www.oxfordshire.gov.uk/residents/roads-and-transport/parking/new-parkingenforcement-areas [accessed 22/11/2021].

Illegally parked vehicles can be reported to the civil enforcement team online.

District: South Oxfordshire Consultation: Shiplake Neighbourhood Plan 2011 – 2035 (Submission Document) Team: Archaeology Officer's Name: Steven Weaver Officer's Title: Planning Archaeologist Date: 10/11/2021

Archaeology Comments

Paragraph 3.4.8 of the plan should be revised so as to make reference to the Oxfordshire Historic Environment Record (HER), this suggested along the lines of:

'Other heritage assets within the parish (i.e. archaeological find spots, monuments, buildings etc) are recorded on the Oxfordshire Historic Environment Record.'

As the HER forms the primary and most comprehensive repository for recorded information relating to the historic environment within the parish we would advise the removal of Figure 5 as we are uncertain as to the source of the material provided and illustrated which is also incomplete.

Paragraphs 6.3.34 to 6.3.38 primarily focuses on the built historic environment and its setting and provides little to no consideration of above or below ground archaeological remains. This is a general theme that appears to run through the plan and its consideration of heritage assets in policy.

We would therefore recommend that the Neighbourhood Plan is amended to include a specific policy on the historic environment that would serve to achieve the goal of conserving and enhancing the historic environment as set out in, and to accord with, the NPPF, this along the following lines:

Policy - Historic Environment

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2021).

District: South Oxfordshire Consultation: Shiplake Neighbourhood Plan 2011 – 2035 (Submission Document) Team: Sufficiency & Access Officer's Name: Nicola Jones Officer's Title: Senior officer Date: 22-11-2021

Education have no comments to make.

Response 47

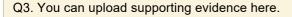
Respondent Details



Your comments

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Response received via email from Savills on behalf of Bolney Court Inc. Please see attachment.



File: 2021-12-07 Savills for Bolney Court.pdf

Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email 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.

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Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified

Representations to the draft Shiplake Neighbourhood Plan

On behalf of Bolney Court Inc.



savills.co.uk



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2.	Planning Policy Context	3
3.	Response to the draft SNP	7
4.	Conclusions	10

Appendices

Appendix 1 – Landscape and Visual Appraisal by Hankinson Duckett Associates



1. Introduction

- 1.1. This representation has been prepared by Savills on behalf of Bolney Court Inc, in response to the submission draft version of the Shiplake Neighbourhood Plan. Bolney Court Inc control land within the Neighbourhood Plan Area, immediately to the north of the settlement of Lower Shiplake. Representations were made to an earlier consultation on the Plan in April 2020.
- 1.2. The land controlled by Bolney Court Inc is c.4.5 ha in area and abuts the existing built up area of Lower Shiplake, in the north of the Parish. It is bordered to the north by Bolney Lane, to the west by the A4155, and to the south by existing residential development at Northfield Avenue. The site itself comprises three distinct fields which are currently used for equestrian grazing, and a Public Right of Way crosses the site from the A4155/Bolney Lane to Northfield Avenue and thence into the centre of Shiplake.
- 1.3. The draft Shiplake Neighbourhood Plan (SNP) has been formally submitted to South Oxfordshire District Council and is currently subject to a six week consultation until 7th December 2021.
- 1.4. The draft SNP is supported by the 'Shiplake Parish Landscape Character Assessment and Contribution of the open land to the separation of the settlements of Lower Shiplake and Shiplake Cross' Report (by Kirkham Landscape Planning and Terra Firm Ltd, April 2021). As part of the evidence base for the Plan, this document is also being consulted on and is referred to in this representation. Indeed, a specific rebuttal to this Report is provided as Appendix 1 to this representation, in the form of a Landscape and Visual Appraisal by Hankinson Duckett Associates.
- 1.5. Following this consultation the draft SNP will become the subject of an independent examination to ensure it meets the 'basic conditions and other matters' as set out at para 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and the national Planning Practice Guidance ('the PPG').

1.6. Summary of representations

1.7. The SNP is short-sighted and lacks ambition in terms of applying the policies of the NPPF and adopted SODC Local Plan. In particular, the SNP does not allocate any sites for development (despite the 'expectation' to do so, as set out at Policy H8 of Local Plan, and contrary to the aims of national guidance). Rather, it relies on existing commitments – some of which are outside the Neighbourhood Area – as justification for the preventative policies which otherwise seek to limit growth and frustrate the aims of sustainable development. This approach is flawed and fails to meet several of the basic conditions.

Shiplake Neighbourhood Plan



- 1.8. Contrary to large parts of the District which are significantly constrained in policy terms, Shiplake Parish is relatively unconstrained with the vast majority lying outside the AONB and with no Green Belt designations. The SNP wholly unreasonably seeks to apply the constraint of 'valued landscape' to the Parish as a blanket designation, without appropriate evidence, with the clear objective of stifling growth. In fact, the designation of valued landscape is neither appropriate to the PLCA3 Landscape Character Area as a whole or to the land owned by Bolney Court Inc specifically: it neither contributes to the character and appearance of the AONB or the Thames Valley landscapes; nor has any high intrinsic landscape value. It is therefore a blunt tool which is not reflected in the very recently adopted Local Plan (or the landscape evidence which supported it) and conflicts with national guidance in the NPPF.
- 1.9. Section 2 of this report sets out the relevant policy contest in greater detail while Section 3 provides the Estate's response to the draft SNP having regard to the 'basic conditions' and in particular:
 - Appropriateness, having regard to national and local policy (basic condition (a));
 - Contribution to the delivery of sustainable development (basic condition (d)); and
 - General conformity with the strategic objectives of the District Local Plan (basic condition (e)).
- 1.10. In summary, the proposed designation of the Estate's land as a 'valued landscape' does not meet the basic conditions and it should be removed from this designation in the Plan. Further, the fact that it is not designated as a site to deliver housing to meet local needs means the Plan falls short of the basic conditions; this should be rectified by means of an allocation for residential development.



2. Planning Policy Context

2.1. The Localism Act (2011) makes provision for Neighbourhood Planning, empowering local communities to develop a shared vision for their neighbourhood and deliver the sustainable development they need through planning policies relating to the development and use of land.

Basic conditions

- 2.2. For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in the national Planning Practice Guidance (PPG).
- 2.3. The basic conditions are:
 - a) "Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
 - b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
 - c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
 - d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
 - e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
 - f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
 - g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)."

National Planning Policy

2.4. The NPPF, published in July 2021, sets out the requirements for the preparation of Neighbourhood Plans and the role they must play in meeting the development needs of an area. Paragraph 13 of the NPPF notes that "Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies". The PPG advises that Neighbourhood Plans "should be prepared positively, in a way that is aspirational but deliverable" (Paragraph: 005 Reference ID: 41-005-20190509).

Shiplake Neighbourhood Plan



- 2.5. Paragraph 29 goes on to state that "*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*".
- 2.6. Paragraph 66 of the NPPF requires Local Planning Authorities to establish a housing requirement figure to meet their identified housing needs over the plan period. It goes on to require that "Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement". This is echoes in the PPG which provides that "The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies" (Paragraph: 101 Reference ID: 41-101-20190509) and that this should be informed by factors such as the characteristics of the Neighbourhood Plan Area, including its population and role in providing services, evidence such as the Housing and Economic Land Availability Assessment, the spatial strategy for the District and any areas of particular importance (with reference to paragraph 11 footnote 6 of the Framework) which may restrict development in an area.
- 2.7. The PPG adds at paragraph: 040 Reference ID: 41-040-20160211 that "Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan" and, in respect of the Plan's preparation, states that "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared" (paragraph 041 Reference ID: 41-041-20140306). Furthermore, the PPG advises that "A neighbourhood plan can allocate sites for development, including housing. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria" (paragraph 042 Reference ID: 41-042-20170728).

Local Policy

2.8. The Local Plan was adopted in December 2020 and replaced saved policies of the South Oxfordshire Local Plan 2011 and Core Strategy (2012). It sets out the overarching planning strategy for the future development in South Oxfordshire up to 2035 and how it will be delivered during the plan period. **Policy STRAT1: The overall strategy** seeks to focus major new development in the 'Science Vale', through strategic allocations at a number of new (mostly greenfield) sites, some of which involve Green Belt release. Lower Shiplake is identified as a 'smaller village', where the policy states that it will support smaller and other villages by allowing for limited amounts of housing and employment to help secure the provision and retention of services. Beyond the settlements, the policy seeks to protect and enhance the countryside (particularly areas of the District in the AONB and Green Belt) by ensuring any changes relate to very specific needs such as those of the agricultural industry or enhancement of the environment.



- 2.9. **Policy STRAT2: South Oxfordshire Housing and Employment Requirements** identifies a minimum housing requirement of 23,550 homes between 1st April 2011 and 31 March 2035, which is made up of a local requirement (18,600 dwellings) and a requirement that will help to meet Oxford's unmet needs (4,950 dwellings). In terms of delivery this represents a figure of 900 dpa until 2025/26, then a higher figure post-2025/26 reflecting the delivery of strategic allocations. The policy states that these requirements are to be delivered in accordance with the spatial strategy set out in STRAT1 and with the locations and trajectory set out in H1.
- 2.10. **Policy H1: Delivering new homes** provides that the housing needs of the District will be delivered through the strategic allocations, previous allocations carried forward and new sites identified through Neighbourhood Plans. Development elsewhere will not be permitted except in certain circumstances, including affordable housing on rural exception sites or entry level housing sites; specialist housing for older people in locations with good access to public transport and local facilities; in the Smaller Villages, it is infill development on brownfield sites; where there are specific exceptions/circumstances defined in NDP's; or the design is outstanding or innovative and would significantly enhance its immediate setting. The reasoned justification highlights that housing supply needs to come from a mix of sources including a mix of site sizes. This includes small scale (less than 100 units) sites to be identified through Neighbourhood Development Plans (or in the Local Plan where NDP's are not being progressed).
- 2.11. **Policy H8: Housing in the smaller villages** states that development will be supported in accordance with Policy H16. Where Neighbourhood Plans are prepared, these "will need to demonstrate that the level of growth they are planning for is commensurate to the scale and character of their village, and this is expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census (minus any completions since 1 April 2011)". The reasoned justification to the policy notes that any housing provided through Neighbourhood Plan in these settlements is 'on top' of the housing requirements of the Plan:

"Smaller villages.... 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. However some parishes may still wish to proceed with preparing a Neighbourhood Development Plan for example to achieve the protection afforded by allocating housing to fund projects they want to deliver or they would like to identify a specific type of housing bespoke to their village's needs. The Council's strategy therefore allows them to do so, provided that the levels of growth are commensurate to the size of the village" (paragraph 4.37).

2.12. **Policy H16: Infill development** allows for infill development within the built up areas of the towns and villages within the District. Infill is defined as "the filling of a small gap in an otherwise continuous built-up frontage or on other sites within settlements where the site is closely surrounded by buildings" and the policy goes on to say that the scale of the infill should be sites of up to 0.2ha (equivalent to 5 to 6 homes) in the smaller villages.



2.13. Elsewhere in the Plan, **Policy ENV1: Landscape and Countryside** provides the highest standard of protection to AONB's, and seeks to protect the district's landscape, countryside and rural areas from harmful development. Development will be permitted where it protects and, where possible, enhances features such as trees, hedges, habitats, the landscape of the River Thames, aesthetic and perceptual factors such as tranquillity and enclosure.

Summary

2.14. For a Neighbourhood Plan to proceed to a referendum, it must meet all the 'basic conditions' set out at paragraph 8(2) of Schedule 4B of the Town and Country Planning Act (as amended). There is also a requirement for Neighbourhood Plans to be prepared positively, to meet the housing requirements identified in strategic policies – including, potentially, through the allocation of sites – and adequately evidence the plans and policies that it contains.



3. Response to the draft SNP

Development Strategy Theme

- 3.1. Policies SV2 and 3 of the SNP seek to limit development outside of the current built up areas to conversion of existing buildings (SV3) and the following (SV2):
 - Proposals for permitted development;
 - Subdivision of existing dwellings;
 - Redevelopment of redundant or disused buildings where this would not affect the landscape or rural character if the countryside;
 - Rural workers dwellings;
 - Development which secures the future protection of a heritage asset; or
 - Development of a dwelling which is exceptional in terms of its design and enhances the local landscape setting.
- 3.2 These reflect the provisions of the adopted Local Plan (e.g. Policy H1), much as policy SV1 of the SNP reflects the provisions of Policy H16 of the Local Plan. However, the policies entirely fail to address the requirements of Policy H8, which contains the "expectation" that Neighbourhood Plans will plan for growth commensurate with the scale of the settlement (equating to a 5-10% increase in households as compared to 2011 Census data).
- 3.3 In this way the policies of the SNP entirely lack ambition, and do not have regard to national policy which requires Neighbourhood Plans to plan positively (contrary to basic condition (a)); do not conform to the strategic policies of the area (contrary to basic condition (e)); and do not contribute towards the aims of sustainable development in the Parish (contrary to basic condition (d)).
- 3.4 The basis for the SNP's lack of planning for growth appears to be the repeated reference in the document (e.g. Exec Summary, paragraph 3.1.9 paragraph 5.3.2) to recent consents for residential development around the edges of the settlements in the Neighbourhood Plan Area. These are given as justification for the absence of any sites or allocations being made for housing in the Plan. This, however, includes a number of sites which are outside the Neighbourhood Plan Area (e.g. 95 units at Thames Farm, 40 units at the former Wyvale Garden Centre).
- 3.5 Further, such sites are <u>commitments only</u> and not allocations. As evidenced by the Courts, reference to commitments in a Neighbourhood Plan does not equate to allocation of sites to deliver growth. Indeed, the District Council's Screening Statement on the determination of need for a Strategic Environmental Assessment (SEA) of the SNP states: "...we note that the plan does not allocate any sites for development..." (paragraph 12).
- 3.6 Merely making reference to extant consents does not meet the requirement for the SNP to plan positively. In the absence of identifying any allocations in the Plan (either existing commitments or identifying new site(s) to meet the housing needs of the community), the SNP is not positively prepared and is not an effective vehicle for steering growth in the Parish in the longer term. In this



way it would not, as currently drafted, contribute towards the achievement of sustainable development or conform with the strategic policies of the development plan as required by the basic conditions (d and e). Shiplake has an important role to play in delivering growth given it is, relatively, one of the most unconstrained Parishes in policy terms (e.g. with respect to Green Belt, AONB, flood risk etc designations). The site owned by Bolney Court Inc lies immediately to the north of Lower Shiplake, is sustainably located with respect to the village and the services and facilities within in, and offers the opportunity to plan for the growth needs of the area for the Neighbourhood Plan period and beyond. It is therefore a more prudent approach, and would entirely accord with the basic conditions, were the SNP to allocate the site for development.

Landscape and Biodiversity policies

- 3.7 Figure 15 of the SNP identifies the land owned by Bolney Court Inc as an outlying part of PLCA3: Shiplake Semi-Enclosed Dipslopes. This is identified as a 'valued landscape' in Policy SV9, which then requires that development proposals in such areas are reflective of the characteristics which define the landscapes. It is noted that Figure 15 identifies the entirety of the Parish (save for the permissions at the retirement village, the Shiplake sports field and land at Tower House) as 'valued landscape'. This blanket designation is neither appropriate nor evidenced, and has the objective of preventing sustainable development opportunities from coming forward.
- 3.8 This representation is accompanied by a Landscape and Visual Appraisal of Bolney Court Inc's land at Lower Shiplake, and considers this against the Shiplake Parish Landscape Character Assessment (LCA) (January 2020) which provides the landscape evidence base for the SNP. The plans in the LCA sometimes annotate the Estate's land as the 'kilnpits' site.
- 3.9 Contrary to the assertions in the LCA, dipslope landscapes are not, in themselves, rare in fact they are common elsewhere in the Parish and in areas adjacent to the AONB. Semi-enclosed dipslopes, in particular, are common and their constituent parts (small scale arable fields and pasture) are not uncommon across South Oxfordshire and the Thames Valley. The SNP is being progress in the context of a very recently adopted Local Plan, with a recently updated evidence based that included landscape character assessment. The Parish Council did not submit representations to that assessment supporting any valued landscape designations within the Parish, and the District level assessment did not identify any (let alone all) of the Parish in these terms.
- 3.10 Notwithstanding this, the Shiplake LCA provides the same four reasons for each of the four landscape character area, as to why they should be designated as a valued landscape. This blanket assessment reaches the same blanket conclusions for all the PLCAs that all areas outside the existing built up areas (save for the three 'areas of permitted development') should be categorised as valued landscapes. As such, this rather peculiarly includes all the consented developments that are referred to as meeting the housing needs of the Parish (e.g. at paragraphs 3.1.9 and 5.3.2, as noted above). Against the four reasons for the designation given for the designation of PLCA3 (which includes our clients land as an outlying site to the north of Lower Shiplake), the contribution of the area to the criteria is substantially over-emphasised:



- 3.11 **Criteria 1**): it is considered that the PLCA "makes an important contribution to the landscape and visual setting of the Chilterns AONB. Semi-enclosed Dipslopes are an <u>integral part of the AONB</u> and a <u>key characteristic and special quality of the AONB</u>..." (our underlining). This assessment is plainly elevating PLCA3 to the significance of the AONB itself, which as noted previously is contrary to the recent District level assessment. In relation to the land owned by Bolney Court Inc specifically, this site is bordered by hedges and a mature avenue of trees along Bolney Lane, which marks a distinct change in landscape character and screens the site from wider views from the AONB. Indeed the site will be separated from the AONB by the Thames Farm development which is under construction. The site therefore is in marked contrast to the rest of the PLCA3 area and makes no tangible contribution to the landscape or visual setting of the AONB.
- 3.12 **Criteria 2**): it is considered that the PLCA "makes an important contribution to the landscape setting of the River Thames". In fact, there is a significant wooded area in between the Bolney Court Inc site and the River, meaning there is no inter-visibility between the two and the paddocks of the kilnpits site and presenting a quite different landscape character to the Thames-side meadows. The site therefore does contribute at all to the landscape or visual setting of the Thames.
- 3.13 **Criteria 3**): it is considered that the PLCA "contains many landscape features of value in their [own] right". As noted previously, this landscape type is not rare, and multiple recent appeal decisions have found that the landscape within PLCA3 is of limited quality, intactness and condition. Indeed, one appeal specifically considered whether land within PLCA3 could be considered a valued landscape and found that it could not.
- 3.14 The Landscape and Visual Appraisal which accompanies this representation concludes that the blanket designation of 'valued landscape' across the Parish is not appropriate either to PLCA3 as a whole nor to the land owned by Bolney Court Inc. The blanket designation includes land that neither contributes to the character and appearance of the AONB or the Thames Valley landscapes; nor has any high intrinsic landscape value. It is therefore a blunt tool which is not reflected in the very recently adopted Local Plan (or the landscape evidence which supported it) and conflicts with national guidance in the NPPF.
- 3.15 The assessment in the LCA has informed the SNP, which describes the Shiplake Semi-enclosed Dipslopes at paragraphs 6.4.32 6.4.34 and includes 'development and visual guidance principles' at paragraph 6.4.35. The description includes that this landscape type is rare (which it is not see above) and that "the fields closest to the village retain strong connectivity, both visually and physically with their rural neighbours" (which, again, has been noted above as incorrect in relation to the land north of Lower Shiplake owned by Bolney Court Inc).
- 3.16 From the above assessment it is patently clear that Policy SV9 of the SNP, in relying on the Shiplake LCA designations of 'valued landscapes' is not supported by proportionate or robust evidence as required by the PPG, and in this way the landscape policies in the SNP are contrary to national guidance and fail basic condition (a). Further, the LCA fails to conform to the landscape evidence supporting the Local Plan, which did not find any of the landscapes within the Parish to be 'valued' in NPPF terms, so failing the test of basic condition (e). Lastly, the aim of the policy is clearly to frustrate sustainable development opportunities which is contrary to basic condition (d)).



4. Conclusions

- 4.1. The above representations make clear that the draft SNP fails to meet a number of the basic conditions in a number of ways. Most notably, the policies relating to the Development Strategy have been shown to fail basic conditions (d) and (e), in failing to contribute towards the achievement of sustainable development or conform with the strategic policies of the development plan. To meet the basic conditions, the SNP should consider allocating land owned by Bolney Court Inc, immediately to the north of Lower Shiplake, for residential development to meet the housing needs of the Parish.
- 4.2. Further, the application of the Landscape policies (in particular Policy SV9) has the potential to significantly undermine the delivery of sustainable development by applying a blanket designation of valued landscapes across the vast majority of the Parish outside the existing built up areas of the settlements. This designation is wholly inappropriate on such a scale, and is contrary to national guidance and the strategic policies of the recently adopted Local Plan. In this way the draft SNP fails to meet basic conditions (a), (d) and (e).



Appendix 1



SHIPLAKE NEIGHBOURHOOD PLAN SUBMISSION DRAFT – SEPTEMBER 2021

LANDSCAPE AND VISUAL APPRAISAL

HANKINSON DUCKETT ASSOCIATES

on behalf of

Bolney Court Inc.

HDA ref: 565.6 December 2021

Shiplake Neighbourhood Plan Submission Draft - September 2021

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Introduction

This report considers the landscape character and visual amenity of land within the Neighbourhood Plan Area for Shiplake Parish, South Oxfordshire. This report has been commissioned by Bolney Court Inc. and has been prepared on their behalf by Hankinson Duckett Associates (HDA).

HDA has considerable experience of landscape and visual assessment and landscape character assessment, working for public and private bodies. HDA has prepared Neighbourhood Plan Character Assessments and completed a County-wide Landscape Character Assessment for Surrey County Council and a review of potential additional areas for inclusion in the Surrey Hills AONB on behalf of Natural England, the Surrey Hills AONB Board and Surrey County Council.

HDA has also carried out district-wide Landscape Character and Landscape Capacity and sensitivity studies for Local Planning Authorities, including the Vale of White Horse, Basingstoke and Deane, Arun, Worthing and Tandridge District and Borough Councils, advising on the appropriateness of sites for development across plan areas, including assessments of development within and adjacent to AONBs and other sensitive landscapes.

The findings in this report focus on the Shiplake Parish Landscape Character Assessment (January 2020) SPLCA which provides the landscape evidence base for the Shiplake Neighbourhood Plan (SNP). The HDA report highlights particular concerns as to the potential designation of all land outside the settlement boundaries as Valued Landscape. The following assessment identifies clear differences in the character and appearance of the various character areas within the parish and a consequential variation in the quality and value that can be attached to the local character areas. On the basis of the following assessment, character area PLCA3: Shiplake Semi-enclosed Dipslopes, should be excluded from the Valued Landscape designation.

Landscape Context

As noted above, the landscape evidence base for the SNP is set out in the SPLCA, undertaken by Kirkham Landscape Planning Ltd and Terra Firma Consultancy Ltd. The assessment provides their analysis of the variation in the character of the landscape across Shiplake Parish. It defines 4 no. Parish Landscape Character Areas (PLCAs). These are:

- PLCA 1: River Thames Meadow and Terraces
- PLCA 2: Shiplake Woods
- PLCA 3: Shiplake Semi-enclosed Dipslopes
- PLCA 4: Shiplake Open Dipslopes

These PLCA's exhibit combinations of landscape features that form locally distinctive and noticeably different landscape character areas. The landscape character area descriptions are largely derived from the SODC Landscape Character Assessment 2017, although the extent and location of the various landscape types identified in the two assessments are different.

HDA Landscape Assessment

With reference to HDA plans HDA1 and 2 and Photographs

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The Parish lies between the River Thames to the east and the Chilterns plateau, an Area of Outstanding Beauty (AONB) to the west. Upper and Lower Hailey Woods (Shiplake Woods) lie within the Parish and form a small part of the AONB to the north-west of Shiplake Cross.

The four Parish LCAs identified reasonably reflect the constituent parts of the Parish landscape, although the extent of semi-enclosed dipslope is at variance with the District-wide assessment. There is a largely even balance between the open and enclosed dipslope landscapes in the Parish and along the nearby Thames corridor. **The conclusion drawn in the SPLA that semi-enclosed dipslope landscapes are rare is misplaced**. This is for two reasons. Firstly, in terms of rarity, the extent of the Ancient Woodland in PLCA 2 Shiplake Woods can properly be described as rare, but the dipslope landscapes are substantially more common across the Parish and in the adjacent areas of the AONB. Secondly, the semi-enclosed dipslope landscapes are a common landscape type and their constituent parts, medium to small scale arable fields and pasture, are not uncommon features around many rural villages in South Oxfordshire and the Thames valley.

Valued Landscape

Having considered the landscape character of the Parish the SPLCA goes on to consider whether the Parish includes 'Valued Landscapes' as defined in the NPPF para 170 a) and b) (now amended to para 174) and 171 (para 175). The SPLCA sets out in the introduction, that it:

"identifies landscape and visual features of value in each area which collectively form the physical attributes which define valued landscapes within the Neighbourhood Plan Area. The Study does not start with the premise that <u>all</u> landscapes are valued (i.e. as falling within NPPF para 170) but through careful examination of those features shared with the AONB or identified as worthy of conservation and enhancement in the SODC Landscape Character Assessment 2017...... identifies those areas that meet the criteria for valued landscapes."

Notwithstanding the premise referenced above, the SPLCA's conclusion is that all landscapes within the Parish do meet the criteria for valued landscapes as defined by the NPPF. The inclusion in some character areas of existing housing outside the defined settlement boundary, characterised as 'developed' countryside*, is clearly at odds with the generally recognised understanding of valued landscape

The extent to which landscape can be considered as a valued landscape has been the subject of much debate, and Government advice has been updated with the rewording of the NPPF Feb 2019 and confirmed in July 2021. Recent appeal decisions have provided further guidance as to what may be considered a valued landscape.

*Appeal references W/16/3161733 and W/19/3220425.

The Inspector's decision on an appeal in relation to a locally valued landscape in Essex identified that *"Paragraph 170(a) explains that valued landscapes should be protected in a*

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manner commensurate with their statutory status or identified quality in a development plan, "... and that...

"A straightforward reading of paragraph 170(a) does not lead to the view that there are other categories of valued landscape (which are not statutorily designated or identified in a development plan")

Inspector Clegg found that the appeal site did not meet these requirements and was not therefore a valued landscape. The appeal decision was recovered by the Secretary of State and he did not challenge Inspector Clegg's interpretation of NPPF Para 170 (174).

In respect of Shiplake, the recently-adopted Local Plan (December 2020) has not identified any landscape designation or Local Green Space in relation to Shiplake Parish. Having the benefit of an updated landscape evidence base for the Local Plan (2017) and having considered landscape policy in the light of local representations, no local designations were proposed by the Local Planning Authority which could support the promotion of the whole of Shiplake Parish, or any part, as a valued landscape in the terms set out in para 174 of the NPPF.

The SPLCA summaries its reasons as why each character area should be regarded as a valued landscape. These reasons are common to all four character areas, namely:

- The contribution the character area makes to the landscape and visual setting of the Chilterns AONB;
- The contribution the character area makes to the landscape and visual setting of the River Thames;
- The value of landscape features, in their own right, that lie within the character area; and
- An assessment of how each character area compares with 'ordinary' landscape.

The SPLCA's assessment of each character area in relation to the above criteria substantially over emphasises the contribution made to the setting of the major landscape assets in the Parish. This is most evident in relation to the Shiplake Semienclosed Dipslopes character area (PLCA3).

PLCA 3: Shiplake Semi-enclosed Dipslopes

The semi-enclosed dipslopes are largely medium-to-small scale fields in pasture or arable production but also include the buildings and grounds of Shiplake College, large houses along Mill Lane, Mill Road and Woodlands Road and mixed farm and commercial business uses at Haileywood Farm and Shiplake Farm. The one unifying characteristic in the area is the level of enclosure afforded by the tree cover and hedgerow network which contains the landscape character area and foreshortens views within the local landscape.

In terms of the value that can be attributed to the Semi-enclosed Dipslopes, HDA's analysis of the SPLCA criteria concludes the following:

<u>Contribution to the landscape and visual setting of the Chilterns AONB</u> The NPPF considers the setting to AONB's at para 176 as follows: *"development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".*

In terms of the setting to the AONB the adjacent landscape character area, within the Parish, is in all cases the open dipslopes (PLCA 4). They form an extensive, large scale and open arable agricultural landscape which skirts the AONB and provide a consistent landscape setting to the ancient woodland in Shiplake Woods (PLCA 2) and to the Wooded Plateau and Dipslopes within the AONB to the south-west. The Semi-enclosed dipslopes (PLCA 3) are detached from the AONB and very largely form no more than a treed backdrop to the Open Dipslope character area.

The visual setting of the AONB can be appreciated from the permissive footpaths along the southern edge of Shiplake Woods and from the public footpaths to the south and west of Shiplake Cross (photographs 1-4). What is apparent from these viewpoints is the treed edge to the Semi-enclosed dipslope character area. The mature trees along Memorial Avenue and the Henley Road west of Lower Shiplake form a distinctive and continuous treed edge to the settlements and to the character area in general (photographs 2-4). Whilst housing on the margins of the village is open to view, the landscape within the character area is enclosed and contained. As such, with the exception of the peripheral landscape which forms a backdrop to the open dipslopes (PLCA 4), the landscape within the Semi-enclosed dipslopes (PLCA 3) contributes little to the visual setting of the AONB.

Recent appeal decisions in respect of Shiplake, referenced below, have confirmed that the contained nature of the semi-enclosed dipslopes and the effectiveness of the landscape structure precluded views to and from the AONB such that no harm from the developments permitted was noted in respect of the AONB or its setting.

The above analysis is particularly relevant to one outlying parcel of land included in the PLCA 3 character area. The Kilnpits, which lies to the north of lower Shiplake, and forms part of the northern outlying parcel of PLCA 3. It comprises a series of paddocks bordered with hedges and a mature avenue of trees along Bolney Lane (photographs 9-10). Built development, recently permitted and under construction, extends westwards over Thames Farm and the redundant plant nursery, the latter bringing residential and commercial development north of Bolney Lane.

The treed character of Bolney Lane marks a distinct change in the scale and character of the landscape north of the village. The Kilnpits are small scale paddocks strongly influenced by the edge of settlement and contained from the wider landscape by the mature trees along their northern boundary. The landscape beyond Bolney Lane is open and large scale and includes pastoral and recreational land uses, see photographs 11-12. It is of note that the SNP makes reference to important views north from Bolney Lane (PLCA 3-5 Gap between Henley and Lower Shiplake, see SNP figure 21) and does not include Kilnpits in that important view.

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Viewed from the edge of the AONB, at Harpsden Woods, the large-scale landscapes north of Lower Shiplake are open to view and form part of the landscape and visual setting to the AONB. The Kilnpits, in contrast, are screened from view by intervening woodland and treed boundaries (photograph 13) and will, with the construction of housing and commercial buildings on the nursery and the Thames Farm site, be separated from the AONB by a significant block of development on the north-western edge of Lower Shiplake. From the foregoing analysis it is evident that the northern parcel of PLCA 3 makes no tangible contribution to the landscape or to the visual setting to the Chilterns AONB.

Contribution to the landscape and visual setting of the River Thames

The River Thames Meadows and Terraces PLCA1, comprises the river, the riverbank and floodplain and the western river cliff and terraces. The character area is largely low lying contained by the western river cliff and extensive riparian woodland within the flood plain and along the base of the river cliff (photographs 14-15). The Warren is the most substantial area of woodland within the character area and lies west of Shiplake College where it spans the river cliff and extends onto the floodplain. The woodland forms the physical and visual separation between the riverine landscape and the more elevated open dipslopes to the northwest (photograph 16).

Whilst the main parcel of PLCA3 lies adjacent to the Thames Meadow and Terraces PLCA and has a limited contribution to the character and appearance of the Thames-side landscape (photograph 17) (mainly in winter months when trees and hedgerow vegetation is out of leaf).

Kilnpits is detached and has little or no relationship with the Thames-side landscape. The paddocks are separated from the Thames-side landscape by a small woodland copse (which lies within PLCA3) and the railway corridor which is also tree lined. These wooded areas do contribute to the overall wooded character of the adjacent Thames-side landscape which is substantially wooded in character. The adjacent paddocks are neither characteristic of the adjacent Thames-side meadows or visually connected to the river corridor, **they do not contribute to the landscape or visual setting of the River Thames Meadows and Terraces PLCA**.

<u>The value of landscape features, in their own right, that, lie within the character area</u> As set out above in Landscape Context, the Shiplake Semi-enclosed Dipslopes are not a rare landscape type and, with the exception of the land and buildings associated with Shiplake College, they include fields in pasture and under arable production which are common features to the surrounds of many villages (photographs 19-21).

Recent appeals within this proposed character area (PLCA 3) have identified a number of points of issue in relation to the value of the landscape.

 Rurality: A significant proportion of land included in the PLCA includes residential development which is less dense than the village centre but includes built form, domestic and suburban curtilages comprising non-indigenous planting and ornamental fencing (photographs 22-24). These characteristics are clearly at odds with the adjacent open agricultural landscapes, a distinction noted by two planning inspectors

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[Appeal ref. W/16/3161733 and W/19/3220425] who described the land as a 'Developed Landscape'. Thames Field, allowed on appeal, is situated adjacent to Kilnpits and when completed will reinforce the developed nature of the character area. Such developed landscapes (PLCA 3) should not be considered as valued landscape in terms of the NPPF definition.

• Landscape intactness or condition: the level of intactness varies across the character area - not all the land within the PLCA is well maintained or, nor are its constituent landscape features in good condition, points noted in the above appeals.

The above appeal decisions make clear reference to the condition, quality and more indirectly to the value of the landscape. A direct reference to the value of the semi-enclosed dipslopes is made in appeal decision W/19/3229352 where the Inspector concluded that the site was not a valued landscape.

Given these recent appeal decisions have found that sites within PLCA 3 are of limited quality, intactness and condition, the contribution that landscape features make to the overall assessment of value is limited. With the exception of Shiplake College and its environs, which are locally distinctive, much of the character area is comprised of common place features which in themselves should not elevate the value of the landscape beyond that of ordinary countryside.

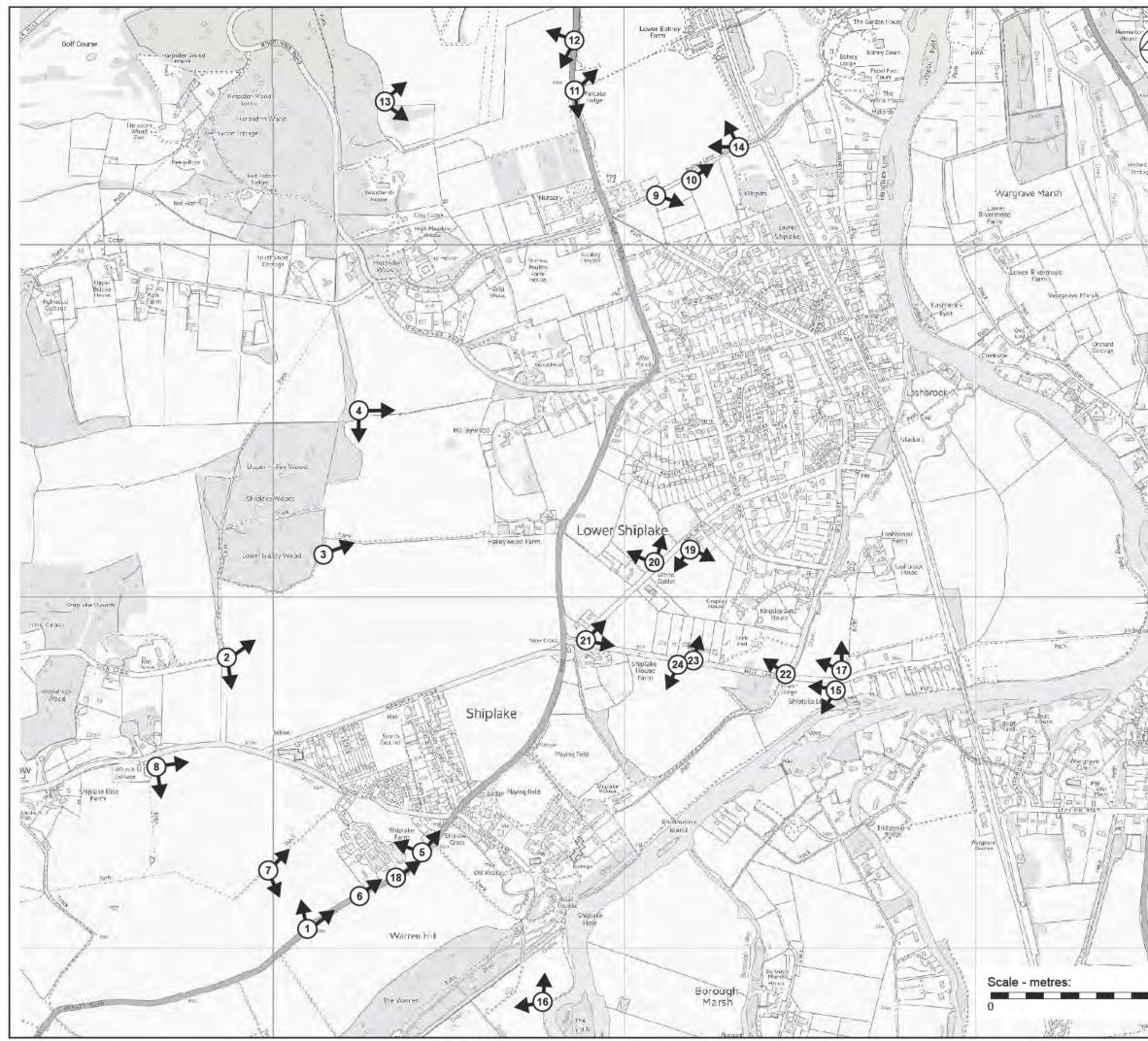
Overall Assessment of Valued Landscape

The Parish includes a number of distinctive landscapes and rare landscape features, in particular the Ancient Woodland at Shiplake Woods. The woodland, which is within the AONB, together with the iconic landscape following the River Thames, should be considered as valued landscapes for the reasons outlined in the SPLCA. However, the Neighbourhood Plan goes much further and seeks to establish a blanket designation of 'Valued Landscape' across the entire Parish. Such a blanket designation includes land that neither contributes to the character and appearance of the AONB or the Thames valley landscapes, neither does it have high intrinsic landscape value. Such a blanket designation is not reflected in the South Oxfordshire Local Plan and it is counter to the guidance of the NPPF.

With regard to the outlying area of PLCA 3, Kilnpits, its contribution to the setting of the AONB and the Thames Meadow and Terraces is negligible. It is physically detached from the AONB and is contained by settlement and, or, mature vegetation and does not form part of any identified 'important view' as set out in the SNP. The area is not seen in visual continuity with the AONB or the Thames-side landscapes. The landscape of the outlying area comprises that of paddocks, a commonplace land use with few notable landscape features. In combination the lack of distinctive landscape features and the negligible contribution the area makes to the setting of the AONB or the Thames-side landscape do not constitute reasoned justification for identifying the area as a valued landscape.

The Semi-enclosed Dipslopes (PLCA 3) should not be considered as a Valued Landscape. They consist of a disparate mix of land uses, which, with the exception of Shiplake College, are commonplace and include landscape features of variable quality, rurality and

distinctiveness. The character area, as a whole, contributes little to the setting of the AONB or the Thames-side landscape, the central parcel providing no more than a treed skyline to the adjacent character areas. In allowing appeals on land within the Semi-enclosed Dipslopes Planning Inspectors, on more than one occasion, have considered the merits of the local landscape within area PLCA 3 and found it to be a 'developed landscape' and not valued when considered against the NPPF definition. The conclusions of this assessment are that Character Area PLCA 3 should not be confirmed as a Valued Landscape.



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Permissive footpath
Railway

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The Stables, Howbery Park, Benson Lane, Wallingford, OX10 8BA † 01491 838175 e consult@hda-enviro.co.uk w www.hda-enviro.co.uk

Project

Shiplake NP Site Photographs, taken 12st April 2020

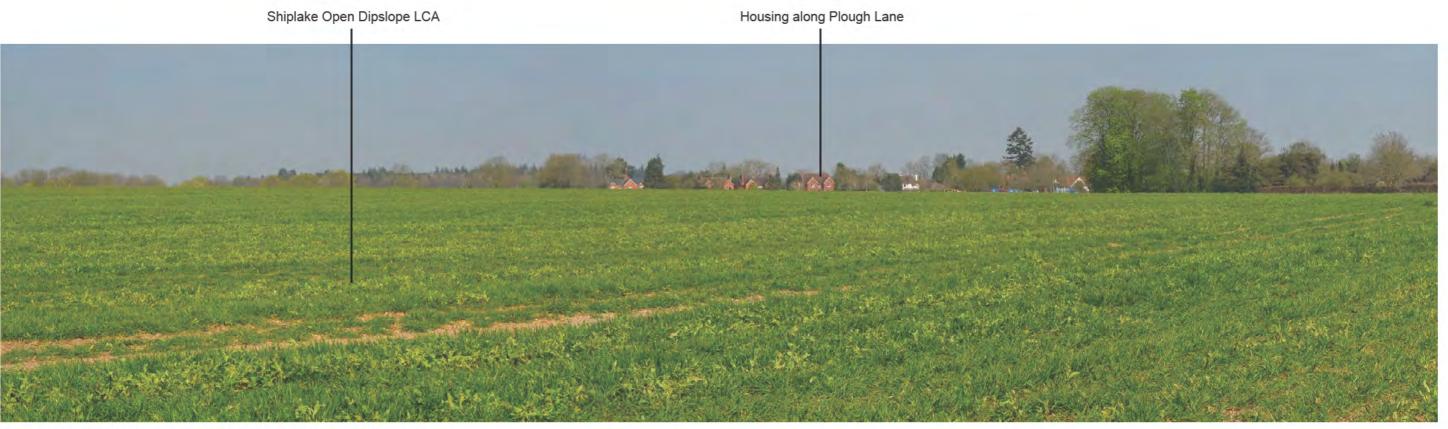
For Bolney Court Inc.

By Hankinson Duckett Associates

HDA LVA Photograph Methodology:

- Take advice from client and agree locations and directions for photographs.
- · Visit site to take existing situation photographs from agreed positions.
- Photographs should be taken in accordance with the guidance from the Landscape Institute Advice Note 01/1. Although the guidance states that the use of 35mm colour
 50mm focal length is still valid, traditional
 mentirely supplanted by digital image processing and associated digital cameras. Therefore
- HDA uses a Nikon D5100 camera
 □ □□□ ED VR lens. The Nikon D5100 camera uses DX technology in its sensor which requires a x1.5 crop factor in order to replicate a traditional 35mm
 □ □ D5100 should be set to 35mm focal length as the closest equivalent to a traditional 50mm lens i.e. 35mm x 1.5 = 52.5mm.
- Whilst on site, the Nikon D5100 is connected to a 'Solemeta Geotagger Pro2' GPS device which records the location and elevation of each photograph taken, by imbedding the GPS information into the metadata of each photograph □ △ As a check, the position and directions of photographs should also be noted onto a paper copy of site survey as accurately as possible by hand.
- On return from site, collate existing situation photographs and document photograph locations and directions.





Photograph 1 View east towards Shiplake Cross from the Henley Road.



Photograph 2 View east from the junction of public footpaths close to AONB.





Photograph 1 Continued.

Housing along Memorial Avenue

Shiplake Primary School

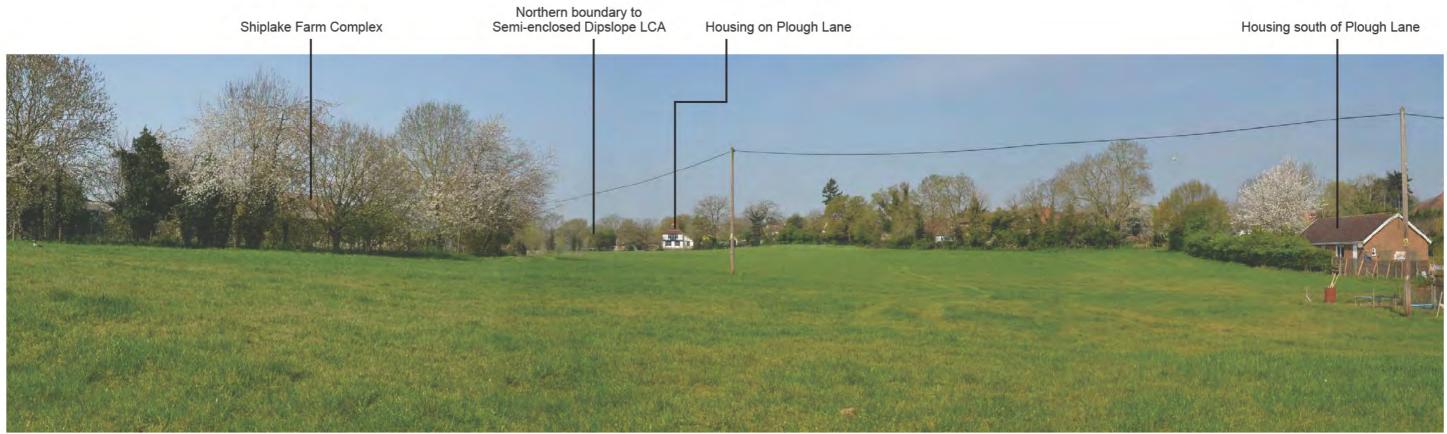


Photograph 2 Continued.





Photograph 3 View south from permissive footpath adjacent to Lower Hailey Wood.



Photograph 5 View north across southern outlier of PLCA 3 from the Henley Road.







Photograph 4 View south-east from permissive footpath adjacent to Upper Hailey Wood.



Henley Road

Photograph 5 Continued.





Photograph 6 View of entrance to Shiplake Cross on the Henley Road.



Photograph 7 View from public footpath north-west of Shiplake Farm.





Photograph 8 View from close to AONB boundary towards Shiplake Cross.



Photograph 9 View of paddocks at Kilnpits, north of Lower Shiplake.



Polo ground

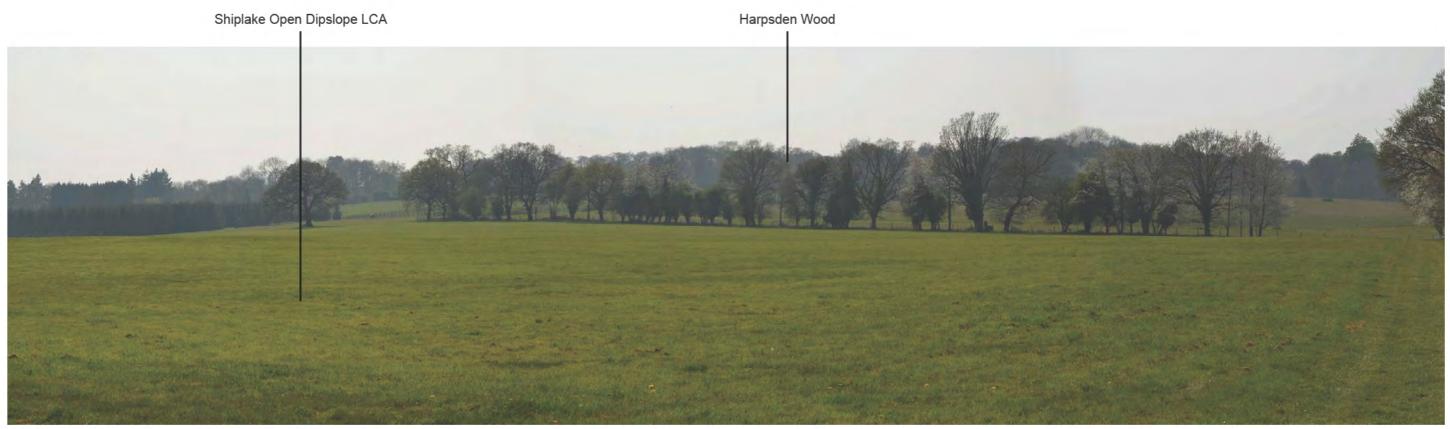


Photograph 10 View east along Bolney Lane adjacent to Kilnpits.



Photograph 11 View across polo grounds to land north of Bolney Lane.





Photograph 12 View of open dipslopes to the west of the Henley Road north of Lower Shiplake.



Photograph 13 View from the eastern edge of Harpsden Wood (AONB).

Lower Bolney Farm





Photograph 14 View from Bolney Lane looking north towards Henley.



Photograph 16 View west and north along Thames-side adjacent to Shiplake College playing Fields .

The Warren





Photograph 15 View west along River Thames adjacent to Shiplake lock.

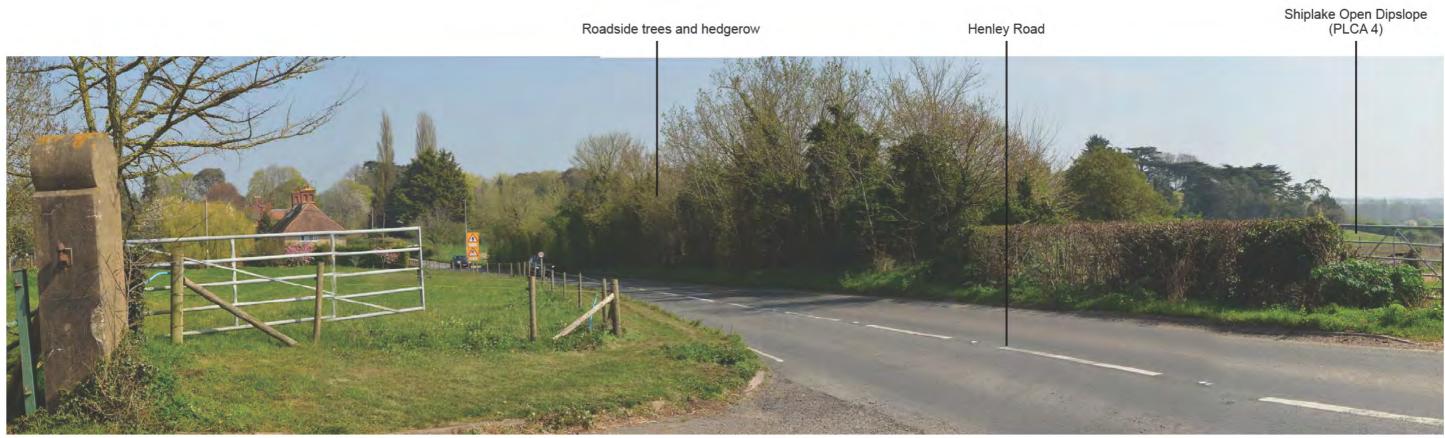


Photograph 16 Continued.



Housing on Mill Road

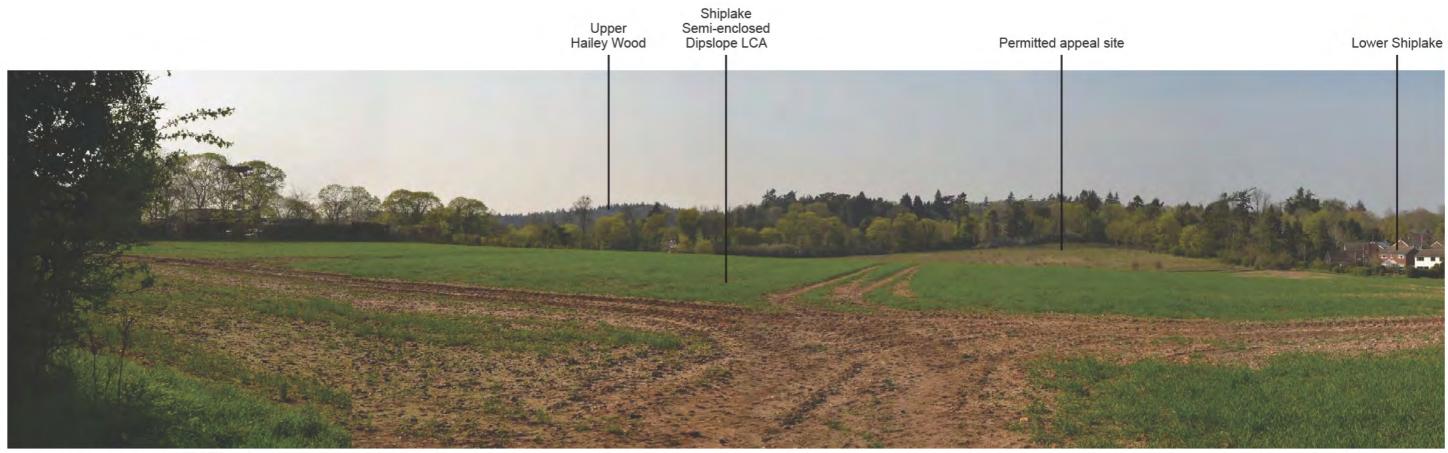




Photograph 18 View east along Henley Road from Shiplake Farm.







Photograph 20 View from New Road towards permitted development site.







Photograph 21 View from New road across PLCA 3.



Photograph 22 Boundary fencing to Mill Lane.





Photograph 23 Gated frontage and ornamental planting to Mill Lane.



Photograph 24 Semi-enclosed Dipslopes adjacent to Mill Lane.



Response 48 (late representation received 10/12/2021)

Respondent Details



Agent

Your comments

Q2. You can provide your comments on the Shiplake Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email from Savills on behalf of Phillimore Estate. Please see attachment.

Q3. You can upload supporting evidence here.

File: 2021-12-10 Savills for Phillimore Estate.pd

Your details and future contact preferences

Q8. After the publicity period ends, your comments, name, email 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	Adrian Beales
Job title (if relevant)	-
Organisation (if relevant)	Savills
Organisation representing (if relevant)	Phillimore Estate
Address line 1	Wytham Court
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7 December 2021



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> Wytham Court 11 West Way Oxford OX2 0QL T: +44 (0) 1865 269 000 F: +44 (0) 1865 269 001 savills.com

Sent via email only

Dear Sirs,

Response to Shiplake Pre-submission Neighbourhood Plan Consultation For land at Plough Lane, Shiplake

This statement has been prepared by Savills who act as Agent to the Phillimore Estate (landowner).

During the last three years we had engaged with representatives of the Shiplake NP Steering Group and reviewing suitable locations for small scale residential housing to mee the specific needs of the local parish as identified from surveys to address existing and anticipated future requirements.

The Steering Group assessed circa 44 sites and they selected six shortlisted recommended sites, the largest site being Plough Lane (site No. 30).

The Steering Group identified part of the Plough Lane site for development and described it as follows:

"This site is thought to be suitable for the development of terraced and semi-detached 2 / 3 bed houses or apartments suitable for young couples and / or senior citizens looking to downsize whilst remaining in the area. The hatched part of this site could support perhaps 12 to 15 units of accommodation."

We consider that the whole of the Plough Lane site as identified below could provide a suitable residential development site with sensitive landscaping.



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East...





The site is bounded by residential development to the north, west and east by housing in Plough Lane and Plowden Way and Shiplake Farm to the southwest. The site therefore provides an infill opportunity within the built up limits of the settlement.

There are no landscape designations and the site is not liable to flooding. The site extends to circa 2.1ha and could provide 20 to 30 dwellings.

We had spent considerable time in discussions with the NP Steering Group and our client was pleased to make this land available for what was considered to be growth of the village and providing sustainable development.

It was therefore very disappointing to note that in the current pre-submission NP Consultation they decided not to allocate any specific residential development sites.

Conclusion

The landowner would like the Plough Lane site to be identified as suitable for residential development within the Shiplake Neighbourhood Plan.

Yours sincerely

sales

Adrian Beales BSc MRICS FAAV Director