

Sonning Common Neighbourhood Plan Review - publicity period (Sept 2022)

Response 1

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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.

SON 15 (Chiltern Edge Top) Sport England has repeatedly raised concerns on the allocation of this site for housing. To date there has been no evidence provided that the site is surplus to requirements for sport which is a requirement of the National Planning Policy Framework paragraph 99, if the site is not to be used for sport or is going to be replaced. Intensification on existing playing field sites is not acceptable. While the agents Savills have had positive discussions with the NDP working group, Sport England has not. We have currently objections outstanding to both the housing planning application and the improvements to school.

Any housing on the playing fields without replacement playing fields or they are shown to be surplus for sport would need to be a departure from policy and therefore have a robust mitigation package for this to happen.

Fortunately, SODC has just commissioned a new playing pitch strategy and the results of this should be available next summer. If the pitches are found to be surplus, then Sport England would not object to the housing. If not Sport England would maintain its objection.

SON 8 (Kennylands Gymnastics) Sport England supports the wording in the policy. Sport England would also advise that the applicants also seek to engage British Gymnastics to see if there is an alternative club which can use the facilities.

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 Sonning Common Neighbourhood Plan Review:

Don't know

Public examination

Q7. Please state your specific reasons for requesting a public hearing below:	
To ensure the case f	

Your details and future contact preferences

Your details and future contact preferences

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

Title	██████████
Name	██
Job title (if relevant)	Principal Planning Manager - South Team
Organisation (if relevant)	Sport England
Organisation representing (if relevant)	-
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Address line 2	Marrow Road
Address line 3	Bisham
Postal town	Marlow
Postcode	SL7 1RR
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Email address	██████████@sportengland.org

Response 2

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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Individual	

Your comments

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<p>Reference: SON 8 (Kennylands Gymnastics)</p> <p>I note the comment in the Sonning Common NDP that states "Retained as a reserve site as in the existing NDP where it was allocated for 14 homes – although revised density guidelines from SODC indicate a greater number in the event of it being developed".</p> <p>Should this site be required in the future, I sincerely hope that the authorities will not tear up the agreement dated 31st March 1983, which placed a restriction for use as an "open space for recreational and amenity purposes", without first giving special consideration to the elderly residents who occupy the flats on adjacent land in Essex Way. The agreement (copy attached) coincided with the development of Essex Way, consisting of bungalows and flats, ALL BEING FOR THE OVER 50's (i.e. retirement homes).</p> <p>I offer an invitation to any member of the SODC and the SCNDP working party to view the land in question from my flat to consider what impact over-development may have.</p>
<p>Q3. You can upload supporting evidence here.</p> <ul style="list-style-type: none">File: Agreement dated 31-3-1983 - Restrictions on Gymnasium Land.pdf - [REDACTED]

Public examination

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<p>Yes, I request a public examination</p>

Public examination

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

The plan is an important document for the future development of Sonning Common.

Your details and future contact preferences

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Title	Mr
Name	C. Balague

Land Registry
Official Copy
This copy may not be the
same size as the original.

50 P
ON75223. 214
H. M. LAND REGISTRY



LAND REGISTRATION ACTS 1925 to 1971

COUNTY: Oxfordshire
DISTRICT: South Oxfordshire
TITLE NUMBERS: ON75362 ON75223
PROPERTY: Land and buildings forming
part of Kennylands School,
Peppard Road, Sonning,
Common.

THIS DEED is made the *thirty-first* day of *March* 1983
BETWEEN MAURICE NEIL WEBB of 149 Halls Road Tilehurst Reading in the
County of Berks (hereinafter called "Mr. Webb") of the first part
PATRICIA ANNE WEBB of 149 Halls Road Tilehurst aforesaid (hereinafter
called "Mrs. Webb") of the second part and SOUTH OXFORDSHIRE DISTRICT
COUNCIL of Council Offices Crowmarsh Wallingford in the County of Oxford
OX10 8HQ (hereinafter called "the Council") of the third part
WHEREAS:-

- (1) Mr. Webb is registered at H. M. Land Registry as Proprietor with
Absolute Title of the freehold property in Title Number ON75362
- (2) Mrs. Webb is registered at H. M. Land Registry as Proprietor with
Absolute Title of the freehold property comprised in Title Number
ON75223
- (3) The Council is the District Planning Authority for the purposes of
the Town and Country Planning Act 1971 of the District in which the land
comprised in the said title is situated
- (4) Pursuant to Section 52 of the Town and Country Planning Act 1971
Section 12 of the Oxfordshire County Council Act 1970 Section 11 of the
Oxfordshire County Council Act 1971 and Section 33 of the Local
Government (Miscellaneous Provisions) Act 1982 the parties hereto have
agreed to enter into this Deed in manner hereinafter appearing

819798

NOW THIS DEED WITNESSETH as follows:-

1. IN pursuance of Section 52 of the Town and Country Planning Act 1971 Section 12 of the Oxfordshire County Council Act 1970 Section 11 of the Oxfordshire County Council Act 1971 and Section 33 of the Local Government (Miscellaneous Provisions) Act 1982 Mr. Webb as Beneficial Owner (in respect of so much of the land hereinafter mentioned as falls within Title Number ON75362) hereby agrees undertakes and covenants with the Council and Mrs. Webb as Beneficial Owner (in respect of so much of the land hereinafter mentioned as falls within Title Number ON75223) hereby agrees undertakes and covenants with the Council with intent and so as to bind the property edged red on the attached plan (hereinafter called "the Site") and every part thereof into whosoever hands the same may come:-

- (a) that the Site shall not at any time hereafter be used otherwise than as open space for recreational and amenity purposes
- (b) except where they already exist or with the prior written consent of the Council (such consent not to be unreasonably withheld in the case of normal field equipment for Association or Rugby football hockey or cricket) no structures erections buildings apparatus plant machinery vehicles (self-propelled or otherwise) or fences shall at any time be erected built constructed fabricated stationed or allowed to remain on the Site nor shall any hedge be formed for the internal division of the same

2. FOR the purposes of this Deed the expressions "Mr. Webb" and "Mrs. Webb" shall where the context otherwise requires include their respective successors in title

IN WITNESS whereof Mr. Webb and Mrs. Webb have hereunto set their

hands and seals and the Council has caused its Common Seal to be
hereunto affixed the day and year first above written

SIGNED SEALED AND DELIVERED
by the said MAURICE NEIL WEBB
in the presence of:-

} *Mammuchwell*



f. Mason..
24 Friar Street,
Reading, Berks.
Legal Assistant

SIGNED SEALED AND DELIVERED
by the said PATRICIA ANNE WEBB
in the presence of:-

} *P Webb*



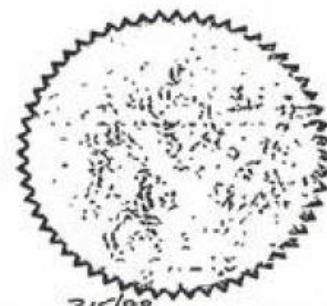
f. Mason..
as above

THE COMMON SEAL of SOUTH
OXFORDSHIRE DISTRICT COUNCIL
was hereunto affixed under
the authentication of :-

}

S. Livingston..

Chief Executive/District Secretary
The Officer appointed for this purpose

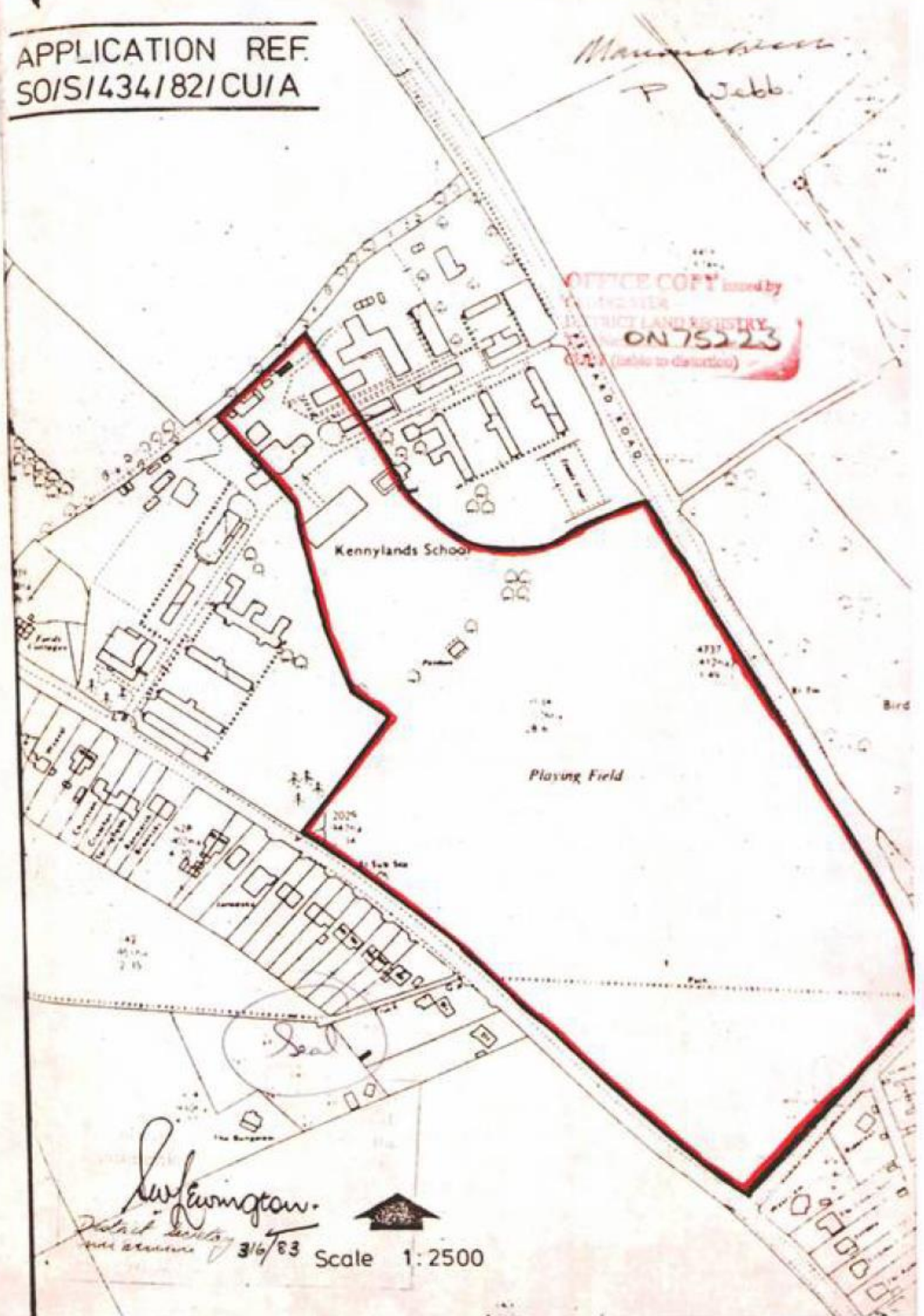


3/5/83

APPLICATION REF.
SO/S/434/82/CI/A

Manning
P Webb

OFFICE COPY issued by
DISTRICT LAND REGISTRY
ON 75223
(date to date)



Luffington
District Secretary
and Planner
3/6/83
Scale 1:2500

Response 3

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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See attached

Q3. You can upload supporting evidence here.

- File: 20221007 SC Response.pdf [REDACTED]

Your details and future contact preferences

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Title	-
Name	██████████
Job title (if relevant)	Senior Planning Policy Officer
Organisation (if relevant)	South Oxfordshire District Council
Organisation representing (if relevant)	-
Address line 1	Abbey House
Address line 2	Abbey Close
Address line 3	-
Postal town	Abingdon
Postcode	OX14 3JE
Telephone number	██████████
Email address	██████████@southandvale.gov.uk

Policy and Programmes

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



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

07 October 2022

Sonning Common Neighbourhood Development Plan Review – Comments on further consultation on revised documents

South Oxfordshire District Council has worked to support Sonning Common Parish Council in the preparation of their neighbourhood plan review and supports the proposed revisions to the Sonning Common Neighbourhood Plan Review and Basic Conditions Statement. The proposed revisions respond positively to our comments made under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended).

[REDACTED]
Senior Planning Policy Officer (Neighbourhood)

Response 4

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Individual

Your comments

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It is another great effort by the NDP team of Sonning Common which builds on the good work already done.

I fully support the inclusion of the Little Sparrows development in the housing allocation numbers.

In particular I also support the entirety of the Transport and Parking Section.

I suggest a small amendment to the wording of the Vision statement, see box below.

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.

Amendment to Vision Statement:-

As a member of the Village Centre Working Party I did suggest this change at an earlier stage however it clearly got lost in the post.

4th paragraph 1st sentence:-

"The village centre will thrive and suffer less from congestion if we can tackle the problem of unregulated on-street parking, maintain a good bus service and enable free-flowing traffic through the main internal artery (along Kennylands Road and Wood Lane). "

Reason for change:- This section is primarily concerned with the problems in the village centre shopping area, so remove Kennylands Road which is not part of this problem. Refer to the village centre improvement plan to see that it only relates to Wood Lane.

Revised wording would be:-

The village centre will thrive and suffer less from congestion if we can tackle the problem of unregulated on-street parking, maintain a good bus service and enable free-flowing traffic through the main internal artery along Wood Lane.

Ends.

Public examination

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No, I do not request a public examination

Your details and future contact preferences

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Title	Mr
Name	Jonny Bidgood

Response 5

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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Individual

Your comments

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Support the proposals

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.

It is simply a recognition of reality to include the disastrous Inspired Villages/Little Sparrows retirement complex site since it has been approved by an obtuse appeal Inspector.

Public examination

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[illegible]

Response 6

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Contact Details

Name [REDACTED]
Email mail@davis-planning.com

Q1. Are you completing this form as an:

Agent

Your comments

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These comments are in respect to proposal site SON 1 (Old Copse Field) which has been designated as Local Green Space in the draft Neighbourhood Plan. There is no evidence in the Parish Council's 'Evidence Base' published online that the site has been assessed properly in respect to its suitability for this designation. The National Planning Policy Framework (NPPF) is very clear that in designating such land, this should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. There is no evidence before the Inspector that this exercise has been undertaken.

Paragraph 102 of the NPPF introduces 3 tests, all of which are required to be passed before a site can be designated. A response is set out to each indent below:

a) In reasonably close proximity to the community it serves: RESPONSE: Whilst the land is adjacent to the settlement, the term 'serves' implies an element of public access. The only access across the land is in relation to a single footpath. The remainder is given over to arable farming and is frequently trespassed. .

b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of wildlife; RESPONSE: No evidence is before the NP Inspector which provides any justification to designate the land for any of these reasons.

c) Local In character and is not an extensive tract of land. RESPONSE: The field is considered to amount to an extensive tract of land well beyond what could be regarded as being 'local in character'. The PPG also states that 'blanket' designation of open countryside adjacent to settlements will not be appropriate.

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.

Remove SON 1 and re-instate solely as AONB/countryside


Public examination

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Title	
Name	
Job title (if relevant)	Planning Consultant
Organisation (if relevant)	Davis Planning Ltd
Organisation representing (if relevant)	Investfront Ltd
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Address line 3	-
Postal town	Wokingham
Postcode	RG41 3HL
Telephone number	01189787972
Email address	mail@davis-planning.com

Response 7

Respondent Details

[Redacted]	
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

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<p>20th October 2022</p> <p>By upload only to SODC Neighbourhood Plans portal. My Ref.: F:\Planning\Planning Policy\</p> <p>Sonning Common Neighbourhood Plan – Submission Version Regulation 16 Consultation Plan Review, and further consultation (to 20th Oct 2022).</p> <p>Thank you for consulting with the Chilterns Conservation Board (CCB). We have considered the examiner's Note (16th August 2022) and the Schedule of Modifications. We fully appreciate the desire here to incorporate into the neighbourhood plan the planning appeal decision to allow the Little Sparrows appeal development. The new policy, now as SON 24, appears appropriate and is linked to a host of other environmental policies to protect, conserve and enhance the special qualities of the AONB. The CCB is content to support this and to work with the neighbourhood planning body to ensure that delivery of SON 24 mitigates and indeed prevents any further erosion of the nationally protected landscape that envelops this site.</p> <p>The CCB is grateful to make this additional point. Our previous comments (10th March 2022) are set out below and have been acknowledged and recorded against the previous consultation.</p> <p>Previously Submitted Comments on the Regulation 16 Consultation. 10th March 2022</p> <p>1.0 Introduction and Summary.</p> <p>1.1. Thank you for consulting the Chilterns Conservation Board (CCB). We made a series of previous comments, at the regulation 14 stage, dealing with policy text and supporting text. We are grateful that these have been fully accommodated by the Neighbourhood Planning Body.</p> <p>1.2. Two policies are the subject of further revisions, as SON 23 and RENV2. The CCB can support both policies but, to assist, we attach very brief further comments dealing with their construction.</p> <p>Previous textual revisions as underlined text. For ease of reference we have placed the regulation 14 pre-submission comments inside the box format and the updated points on the regulation 16 submission comments outside the box format at the end of these representations.</p> <p>Pre-Submission Consultation</p>

Environment (RENV2 - reference to the 2021 NPPF)

Objectives: To protect the AONB, to conserve and enhance the Neighbourhood Development Plan area's countryside and open spaces and the wooded and rural character of Sonning Common village and its ecosystems and biodiversity.

Policy RENV1 - To support development which actively seeks to improve the connectivity of green infrastructure and enhance biodiversity (and not to support development which further fragments green infrastructure and impacts negatively on biodiversity).

Policy RENV2 - To support developments which do not negatively impact on the AONB and deliver the key duties of conservation and enhancement of the special qualities of the AONB. Planning permission should be refused for development within the AONB other than in exceptional circumstances as set out in the National Planning Policy Framework, where it can be demonstrated that there is a significant benefit to the village community.

Submission Version

Policy RENV2 – Development proposals which do not have an unacceptable adverse impact on the locally and nationally valued landscape setting of the village and which deliver the key duties of conservation and enhancement of the special qualities of the AONB will be supported.

CCB revisions. This is to cover both the setting within the AONB (i.e., nationally protected) and that element outside the AONB (i.e., locally valued, within the scope of the NPPF.)

SON 23 Supporting Text Pre-Submission Version.

The revision of the plan proposes as a new allocation a site on Widmore Lane (SON 23) which is included in the AONB, even though it has been used for many years as the staff car park for Johnson Matthey. This site shares none of the accepted characteristics of the AONB - it is, in effect, a brownfield site. Its use for housing has been supported in successive consultations with the village, and in the opinion of the revision working party its use for housing comes under the 'exceptional circumstances' proviso.

We understand the arguments advanced here. If SON 23 were to progress as a reserve site, then the Neighbourhood Plan Steering group will want to consider policy objectives/outcomes or indeed policy text for this site. The existing boundary treatment enjoys some fine features, especially in the boundary wall. The wider boundary to the adjoining Little Sparrows site enjoys potential for an open boundary treatment. These could be matters for policy detail. The 20+ threshold is better expressed as an indicative number, subject to layout and design treatment.

Map 5.2: SON 23 – Johnson Matthey car park

The CCB accepts the logic as advanced in support of the allocation as a reserve site. As mentioned above, we recommend that various policy parameters are stated in the text, such as (i) the conditions that make phasing viable, (ii) treatment of the walling and (iii) the fostering of an open boundary with the Little Sparrows site, should this come forward.

Submission Consultation (additional/new text).

SON 23 (Johnson Matthey car park)
Homes: approximately 20
Status: Allocated as a reserve site

This site (0.7 hectare), is on the eastern edge of the village at the junction between Widmore Lane and Blounts Court Road. It is owned by Johnson Matthey, the sustainable technologies company whose research and development centre is located immediately opposite on Blounts Court Road. Even though it is tarmaced and has been used as a car park for many years (currently there are spaces for around 150 vehicles) it is within the Chilterns AONB

The site was submitted by Johnson Matthey (JM) for potential development in 2018 as a result of an invitation from the NDP Revision working party to all landowners. At present the car park's vehicle access is onto Widmore Lane, and it is envisaged that this would remain the sole vehicle access in the event of the site being developed for housing. There is a pedestrian access onto Blounts Court Road which could be retained. There have been extensive discussions between representatives of the NDP Revision working party and JM. It has been emphasised from the start that the working party would want to see any development on such a small site being weighted towards smaller two and three bedroom homes. The company's representatives have been fully supportive of that approach. SODC's LP2035 has dropped the 25 dph (dwellings per hectare) density guideline laid down in the previous Core Strategy, and has asserted the need to increase density in order to achieve the most efficient use of development land, without specifying a recommended or prescribed level. The housing market has also seen a tendency towards a stronger demand for smaller homes (and a corresponding weakening in the demand for five and six bedroom homes). It follows that accommodating 20

or slightly more homes on the JM car park would not be excessive – and would help meet identified local housing needs. In the extensive and thorough process of consulting the village on the sites submitted for possible development the JM car park (SON 23) came out consistently as the most favoured site. Feedback forms distributed after the public consultation on 14 November 2019 elicited a strong response. 68% of those who completed a form regarded the site as suitable for development. The next highest approval figure achieved by any other site was 44%. An equally strong endorsement came from the questionnaires completed after the public exhibition on 29 February 2020. The site was also considered suitable for development in the landscape assessment carried out by independent consultants, Terra Firma, on behalf of the working party. There remains the question of the AONB designation. The Chilterns AONB boundary was designated in the 1960s. The current use of the site as a car park came later, but it is not clear how that use was approved. But the fact is that it was. As a result, it shares none of the accepted characteristics of the AONB, in that it is not open countryside and does not comprise part of a valued landscape. It is partly enclosed by a high brick-and-flint wall, and on other sides by hedging, shrubs and trees. It is significant that the Chilterns Conservation Board, in its submission in the consultation on this revision, supported the conclusion that this is a brownfield site as defined in the NPPF's glossary. In those circumstances, and in view of its approval rating in the consultation process, the NDP Revision working party decided unanimously to bring it forward as the one new housing allocation. In view of the Little Sparrows planning permission alluded to elsewhere, this has now become a reserve site. Any proposal to develop the site should be required to retain the high brick-and-flint wall that separates it from Blounts Court Road, which is considered a non-designated heritage asset. Any applicant should be required to undertake a full assessment of the historic interest of this wall and its relationship with Blounts Court Farm, in accordance with Local Plan Policy ENV6 and NPPF paragraph 194. An outline application would not be acceptable – given the heritage issues a full planning application would be required.

2.0. Additional CCB Comments.

2.1. We understand and support the points made, which represents useful clarification. As reported, the decision made by the Secretary of State at the Little Sparrows site materially affects the potential future development of SON 23. Further the outcome of application P20/S2161/FUL to improve the JM site and relocate the car parking, is also relevant. That application is accompanied by transport aspirations to, amongst other things, limit the traffic generated by the JM operation.

2.2. The Neighbourhood Planning Body may feel it appropriate to list a series of policy objectives as set against SON 23. These would clarify that as this site becomes available upon the relocation of the existing site (as to be determined by SODC) and as a reserve option, various design and layout aspirations need to be delivered. For example, that any future application must be assessed against the following:

- (1) Consistent with the design principles in the Neighbourhood Plan, the Vale/SODC Design Guide and the Chilterns Buildings Design Guide.
- (2) A design layout sympathetic to the setting of the boundary wall, a non-designated heritage asset.
- (3) Access details sympathetic to the AONB location.
- (4) The promotion of ecological connectivity across the site, enhancing links with between Widmore Pond and the wider landscape. This, additionally, to consider and link with the proposed ecological corridors in the appeal approval at the neighbouring Little Sparrows site. In support of this (subject to the decision of SODC) the application at Johnson Matthey (P20/S2161/FUL) is accompanied by a preliminary ecological appraisal (June 2020) that promote net gain with new species rich native hedgerows and links to a wildflower meadow. The appeal decision at Little Sparrows (APP/Q3115/W/20/3265861) condition 7 requires delivery of a biodiversity enhancement plan, including details of habitat creation. The appeal evidence included an ecological impact assessment (May 2020 revision E) which proposed the creation of species rich grassland and enhanced hedgerows (paragraph 4.10 and table 15).

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 CroW Act).

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 proposed



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 Sonning Common Neighbourhood Plan Review:

No, I do not request a public examination

Your details and future contact preferences

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

Title	
Name	 The Chilterns Conservation Board
Job title (if relevant)	Planning Adviser
Organisation (if relevant)	The Chilterns Conservation Board
Organisation representing (if relevant)	The Chilterns Conservation Board
Address line 1	The Lodge
Address line 2	Station Road
Address line 3	-
Postal town	Chinnor
Postcode	OX394HN
Telephone number	01844355500
Email address	planning@chilternsaonb.org

Response 8

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 the Marine Management Organisation (MMO).

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 2022-09-08 MMO.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	The Marine Management Organisation
Job title (if relevant)	-
Organisation (if relevant)	The Marine Management Organisation
Organisation representing (if relevant)	-
Address line 1	Lancaster House
Address line 2	Hampshire Court
Address line 3	-
Postal town	Newcastle upon Tyne
Postcode	NE4 7YH
Telephone number	-
Email address	Consultations.MMO@marinemanagement.org.uk

From: SM-MMO-Consultations (MMO) <Consultations.MMO@marinemanagement.org.uk>
Sent: 08 September 2022 09:06
To: Planning Policy S&V
Subject: Consultation response- PLEASE READ

Follow Up Flag: Follow up
Flag Status: Flagged

****EXTERNAL****

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,
The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other

information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.

- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

This message has been sent using TLS 1.2

The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

This email originates from outside of the council.

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

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

Response 9

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 SSE. Please see below:

"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 this present time, I have no further comments to make over and above those already provided in my letters dated 20 February 2015, which were sent to Sonning Common Parish Council.

For your information and assistance, I have attached these, in case Sonning Common Parish Council are unable to 'source' these from their archives.

I trust that the attached is sufficient for your purposes at this time, but if you should have any queries, please contact me."

Q3. You can upload supporting evidence here.

- File: Chief Planning Officers [REDACTED].pdf - [REDACTED]
- File: DPM_Combined.pdf - [REDACTED]
- File: SCNDP_OHLs_Response_Letter - [REDACTED]
- File: SCNDP_Response - [REDACTED]
- File: SCNDP_Sites.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	-
Organisation (if relevant)	Scottish and Southern Electricity Networks
Organisation representing (if relevant)	-
Address line 1	1 Woodstock Road
Address line 2	Yarnton
Address line 3	-
Postal town	Kidlington
Postcode	OX5 1NY
Telephone number	-
Email address	██████████@sse.com

Draft Letter to Planning Authorities

Consultation re-proposed major housing/commercial developments

Planning permission has recently been granted for a number of housing or industrial / commercial developments on land crossed by overhead lines which are owned and operated by Southern Electric Power Distribution (SEPD). SEPD is concerned that insufficient discussion has taken place between SEPD and Planning Authorities concerning the future of these lines prior to the granting of planning permission.

These overhead lines generally afford supplies to other locations beyond the development, even whole towns or parts of cities in some instances and are carried on either steel towers or wood poles. These structures and the overhead conductors they support have been placed in accordance with planning permission in the form of a Section 37 (Electricity Act 1989) consent granted by the Secretary of State. This consent can only be granted following initial consultation with the Local Planning Authority.

For Planning Authorities to not properly consult and to impose conditions such as “the overhead lines are to be removed”, which developers would be unable to comply with themselves would effectively be *ultra vires*. We believe this issue has been previously highlighted in the letter from the Office of the Deputy Prime Minister to the Chief Planning Officers in England dated 25 November 2002. (copy enclosed)

As such, SEPD believes that in these circumstances, the Planning Authority should impose a condition prohibiting development until such time as the developer has reached agreement with the Distribution Network Operator (DNO) (a) as to how the development can be laid out such that the line(s) can be retained in their current position or (b) such that contractual arrangements have been agreed to modify the overhead lines.

It is for Planning Authorities to consider how best to achieve this when land is first being considered for development. For example it may be that Planning Authorities consider imposing conditions on developers requiring them to conclude arrangements for modifying the existing overhead lines before submission of their Planning Application or prior to any planning permission being granted.

I would be pleased to receive any comments you may have and discuss further, (if necessary by meeting with you) how to improve consultation on this important issue.

I look forward to hearing from you.

Yours faithfully



Network Operations and Planning Manager



OFFICE OF THE
DEPUTY PRIME MINISTER

Chief Planning Officers in England

[REDACTED]
Head of Development Control Policy
Office of the Deputy Prime Minister
4/H2 Eland House
Bressenden Place
London SW1E 5DU

[REDACTED]
[REDACTED]@odpm.gsi.gov.uk

Web site: www.odpm.gov.uk

Our Ref: PDC 31/2/1

25 November 2002

Dear Colleague

CIRCULAR 11/95: USE OF NEGATIVE CONDITIONS

I am writing to draw your attention to the advice in paragraph 40 and the footnote on page 16 of the Annex of Circular 11/95 on The Use of Conditions in Planning Permissions. The advice is on conditions worded in a negative form, prohibiting development until a specified action has been taken.

Following the High Court case *Merritt v SSETR and Mendip District Council* we need to amend the advice in Circular 11/95. Until we are able to amend the Circular, please would you note the following advice when imposing negative planning conditions.

The advice in Circular 11/95 on conditions depending on other's actions (Annex paragraphs 38 and 39), says that it is unreasonable to impose a condition worded in a positive form which developers would be unable to comply with themselves, or which they could comply with only with the consent or authorisation of a third party. Similarly, conditions which require the applicant to obtain an authorisation from another body should not be imposed.

Although it would be *ultra vires* to require works which the developer has no powers to carry out, or which would need the consent or authorisation of a third party, it may be possible to achieve a similar result by a condition worded in a negative form, prohibiting development until a specified action has been taken.

The way the advice is currently worded in paragraph 40 is that such a condition should only be imposed on a planning permission **if there are at least reasonable prospects** of the action in question being performed within the time-limit imposed by the permission.

As a result of the Judgement in *Merritt*, paragraph 40 should be amended to read, "It is the policy of the Secretary of State that such a condition may be imposed on a planning permission. However, when **there are no prospects at all** of the action in question being performed within the time-limit imposed by the permission, negative conditions should not be imposed. In other words, when the interested third party has said that they have no intention of carrying out the action or allowing it to be carried out, conditions prohibiting

development until this specified action has been taken by the third party should not be imposed."

The foot note at the bottom of page 16 should be replaced with: "A policy of refusing permission where there was no reasonable prospect of planning conditions being met could be lawful, but sound planning reasons for the refusal should be given and it should be made clear that this was only a starting point for consideration of cases."

Yours sincerely,

A solid black rectangular box used to redact a signature.

Your reference:

In Any Reply Please Quote: CJG/SCNDP_Sites_DOM

SONNING COMMON PARISH COUNCIL
PARISH CLERK'S OFFICE
VILLAGE HALL
WOOD LANE
SONNING COMMON
READING
RG4 9SL

For the attention of :- Mr BARRIE GREENWOOD

- Chairman SCNDP Working Party

Dear Sir,

Sonning Common Neighbourhood Development Plan

I refer to your eMail message dated 12 February 2015 sent to my colleague, Martin Thacker, regarding the above topic.

Martin is temporarily on other duties, so I am responding on his behalf, in this instance.

The housing and development land areas detailed in the above document are typical of a number of recent sites across Southern England, where insufficient discussion has taken place between planning authorities and ourselves, prior to planning permission being granted. I attach a copy of a letter sent to all chief planning officers in our licence area in March 2012, which summarises the situation.

The land concerned is crossed by various 132,000 volt (132kV) overhead tower line (OTL) (solid black with purple squares), 33,000 volt (ehv) overhead lines (solid green + solid green with purple squares) and 11,000 volt (hv) overhead lines (solid red), as detailed in the table below, which form an essential and integral part of Southern Electric Power Distribution's wider network and as such must be retained.

Please **note** that in the case of any 132 kV OTL, this is an extremely important link in our transmission system. Modifying a line such as this is a major undertaking, which should be avoided if possible. Consequently, our advice to developers carrying out feasibility studies on land crossed by such OTLs, is that these should be regarded as permanent physical features. The layout of any development should, therefore, be designed to allow the OTL to remain undisturbed, in the present position, if at all possible.

For your information and assistance, underground cables are indicated by a dashed line, with red for hv and green for ehv.

 **Scottish and Southern
Energy**
Power Distribution

1 Woodstock Road
Yarnton
Kidlington
Oxfordshire
OX5 1NY

(Tel 01865 845888
+ eMail [REDACTED]@sse.com

20 February 2015

Area	132kV	ehv	hv
SON 2/3	0	0	1
SON 6	0	0	1
SON 7/7a	0	0	0
SON 9	0	0	1
SON 15a	0	0	1

Development beneath the overhead lines or diversion / undergrounding of the overhead lines may not be possible, in which case the development as planned would be unable to proceed.

No contractual arrangements have been agreed with any developer for modification of the above circuit/s. Therefore, any conditions imposed, should permission be granted, must be on the developer and not the Distribution Network Operator, as is the case for other existing infrastructure.

To ensure that the proposal is deliverable, you may consider it best to impose a requirement on the developer to agree contractual arrangements with Southern Electric Power Distribution for any modifications prior to permission being granted.

We would consider the granting of planning permission without further discussion and agreement as to how our equipment can be accommodated within the proposal to be unacceptable.

For your information and assistance, I have attached a copy of our Mains Records showing the equipment affected for each of the above locations detailed in the above table.

Clearly, the above principles would apply to any development area, which is crossed by ehv and/or hv overhead lines.

Yours faithfully,




Network Investment Engineer

Your reference:

In Any Reply Please Quote: CJG/SCNDP_Sites_DOM

1 Woodstock Road
Yarnton
Kidlington
Oxfordshire
OX5 1NY

(Tel 01865 845888
+ eMail [REDACTED]@sse.com

**SONNING COMMON PARISH COUNCIL
PARISH CLERK'S OFFICE
VILLAGE HALL
WOOD LANE
SONNING COMMON
READING
RG4 9SL**

20 February 2015

For the attention of :- Mr BARRIE GREENWOOD

- Chairman SCNDP Working Party

Dear Sir,

Sonning Common Neighbourhood Development Plan

I refer to your eMail message dated 12 February 2015 sent to my colleague, Martin Thacker, regarding the above topic.

Martin is temporarily on other duties, so I am responding on his behalf in this instance.

At this stage, I can only provide general guidance on the provision of electricity infrastructure and the treatment of any existing infrastructure in relation to future development.

Connections for new developments from existing infrastructure can be provided subject to cost and time-scale.

Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement required would normally be apportioned between developer and DNO (Distribution Network Operator) in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum time-scales in these instances would not normally exceed around 2 years and should not therefore impede delivery of any proposed housing development.

Where overhead lines cross development site, these will, with the exception of 400 kV tower lines, normally be owned and operated by Scottish and Southern Energy Power Distribution (SSEPD).

In order to minimise costs, wherever possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practicable, or where

developers choose to lay out their proposals otherwise, then agreement will be needed as to how these will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits. The existing customer base should not be burdened by any costs arising from new development proposals.

To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with SSEPD, prior to submission of a planning application.

Conclusion

I trust the above is helpful to you at this current stage of your deliberations, but you can contact me directly on the above telephone number should you require any further advice, particularly relating to specific sites.

However, for your information and assistance, please see the attached **Appendix A**, which includes additional information in respect of the areas detailed in your additional sites document.

Yours faithfully,



Network Investment Engineer

APPENDIX A

The identified areas are :-

Area	Dwellings	Comments
SON 2/3	52	See Note 1
SON 6	26	See Note 1
SON 7/7a	30	See Note 1
SON 9	60	See Note 1
SON 15a	37	See Note 1

NOTE

1. It is anticipated ***at today*** that there may be sufficient capacity available to be able to supply this site from our ***Kidmore End 33/11kV*** primary substation and the existing hv distribution network, without any off-site reinforcement works.

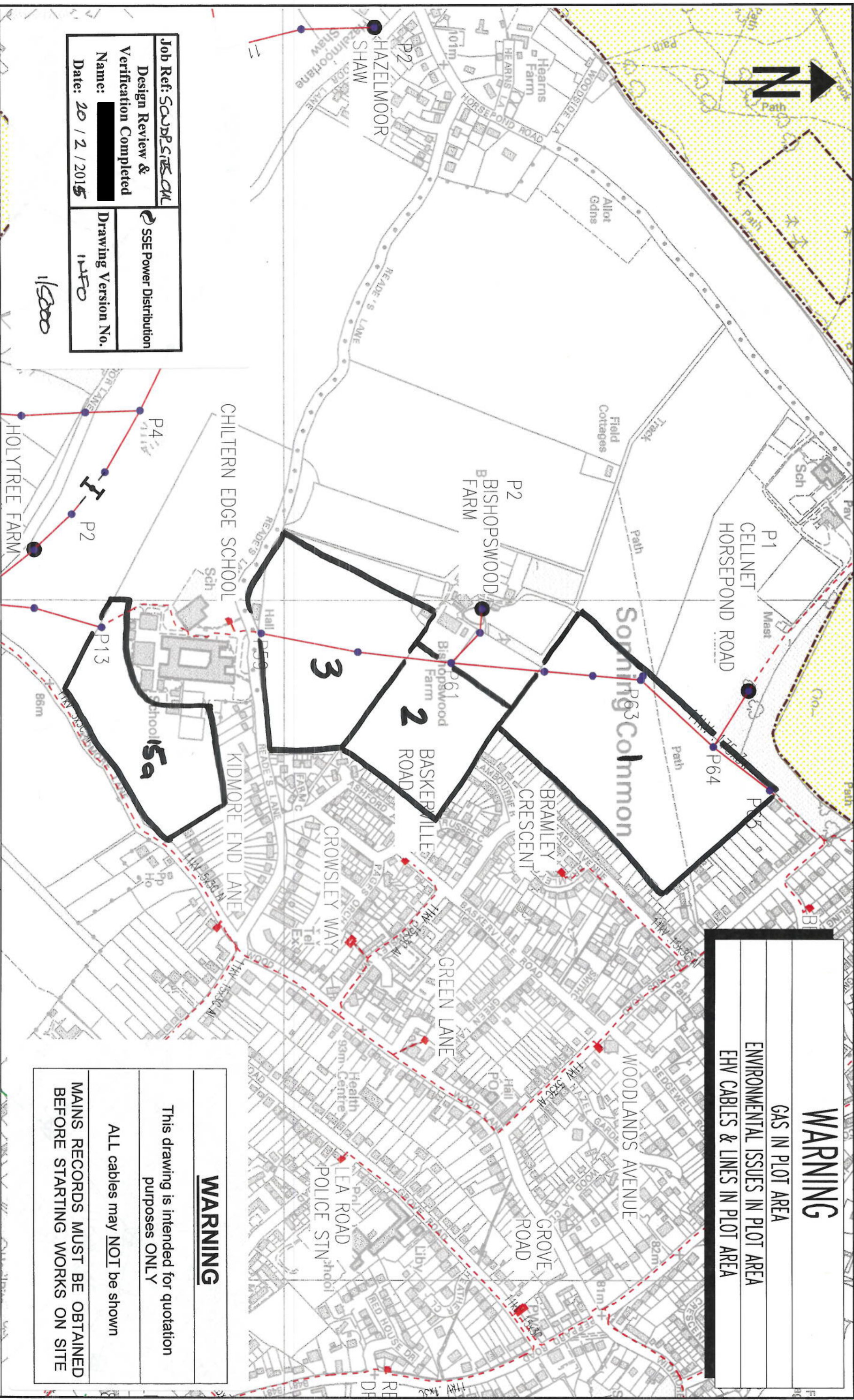


WARNING

GAS IN PLOT AREA

ENVIRONMENTAL ISSUES IN PLOT AREA

EHV CABLES & LINES IN PLOT AREA



Job Ref: **SC02P5752501**

Design Review & Verification Completed

Name: **[REDACTED]**

Date: **20 / 2 / 2015**

SSE Power Distribution

Drawing Version No. **1450**

WARNING

services	l.v.	h.v.	e.h.v.
FOOTPATH	0.40m	0.45m	0.60m
ROAD CROSSING	0.60m	0.60m	0.75m
l.v./services	- up to 1000V.		
h.v.	- over 1000V. to 11.000V.		
e.h.v.	- 22.000V. to 132.000V.		

There may have been subsequent alterations to the surface level. Trial holes must be taken to determine positions and depths of cables. HS (G) 47 Booklet from the Health and Safety Executive - Avoiding Danger from Buried Cables - should be consulted before commencing excavation work. (available from HSE)

WHEN WORKING IN THE VICINITY OF OVERHEAD LINES THE HEALTH AND SAFETY GUIDANCE NOTE G58 SHOULD BE CONSULTED. (AVAILABLE FROM HSE)

Based upon the Ordnance Survey map with the sanction of the Controller of H.M. Stationery Office. Crown Copyright Reserved.

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Scotish and Southern Electric plc
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Perth, PH1 3AQ

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Subject to Revision Master held at

H.V. MAINS RECORD	Grid Ref: SU70158020
READING	Scale: 1:5000
01189-126500	Date: 20/02/2015



WARNING

This drawing is intended for quotation purposes ONLY

ALL cables may NOT be shown

MAINS RECORDS MUST BE OBTAINED BEFORE STARTING WORKS ON SITE

GAS IN PLOT AREA
ENVIRONMENTAL ISSUES IN PLOT AREA
EHV CABLES & LINES IN PLOT AREA

ALL cables may NOT be shown

MAINS RECORDS MUST BE OBTAINED BEFORE STARTING WORKS ON SITE



NORMAL DEPTH TO THE TOP OF THE CABLE WHEN LAID

	services	l.v.	h.v.	e.h.v.
FOOTPATH	0.10m	0.45m	0.60m	0.75m
ROAD CROSSING	0.60m	0.60m	0.75m	0.90m
l.v./services	- up to 1000V.			
h.v.	- over 1000V. to 11,000V.			
e.h.v.	- 22,000V. to 132,000V.			

There may have been subsequent alterations to the surface level. Trial holes must be taken to determine positions and depth of cables. HS (C) 47 booklet from the Health and Safety Executive should be consulted before commencing excavation work. (available from HHSO)

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READING
01189-126500

Date: 20/02/2015

Response 10

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 Historic England.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 2022-09-13 Historic England.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	Business Officer
Organisation (if relevant)	Historic England
Organisation representing (if relevant)	-
Address line 1	Canon Bridge House
Address line 2	25 Dowgate Hill
Address line 3	-
Postal town	London
Postcode	EC4R 2YA
Telephone number	-
Email address	██████████@historicengland.org.uk



Historic England

To Whom it may concern

Our ref: PL00015506

13/09/22

Dear Sir/Madam,

Ref: Sonning Common Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on e-seast@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[Redacted Signature]

Business Officer

E-mail: [Redacted]@historicengland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Response 11

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 Natural England. Please see the attached.

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 405898 Natural England Response Letter Revised Sonning Common Neighbourhood Plan.pdf - [REDACTED]

Your details and future contact preferences

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

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

Date: 15 September 2022
Our ref: 405898
Your ref: Sonning Common Neighbourhood Plan Review



[REDACTED]
Enquiries/Assistant Planning Officer
Planning Policy,
South Oxfordshire District Council
'Freepost SOUTH AND VALE CONSULTATIONS'

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

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

T 0300 060 3900

Dear [REDACTED]

Consultation on revised documents submitted on the Sonning Common Neighbourhood Plan Review

Thank you for your consultation request on the above dated and received by Natural England on 8th September 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that the revised Sonning Common Neighbourhood Plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

[REDACTED]
Operations Delivery
Consultations Team
Natural England

Response 12

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 Vail Williams on behalf of Johnson Matthey.

Q3. You can upload supporting evidence here.

- File: 2022-09-29 Vail Williams.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	Associate
Organisation (if relevant)	Vail Williams
Organisation representing (if relevant)	Johnson Matthey
Address line 1	Vail Williams LLP
Address line 2	Ground Floor Apex Plaza
Address line 3	Forbury Road
Postal town	Reading
Postcode	RG1 1AX
Telephone number	-
Email address	██████████@vailwilliams.com

Ref: SI/P18-514
Date: 29th September 2022



Vail Williams LLP
Ground Floor Apex Plaza
Forbury Road
RG1 1AX

Tel 0118 909 7400
vailwilliams.com

Planning Policy
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

Sent via email: planning.policy@southandvale.gov.uk

Dear Sir/Madam

Letter of Representation to Consultation on the Revised Sonning Common Neighbourhood Plan
Representor: Johnson Matthey Plc.

Vail Williams LLP have been instructed by Johnson Matthey Plc (JM) to submit this letter of representation in relation to SODC's consultation on the revision to the Sonning Common Neighbourhood Plan 2021 following the Inspector's Examiners Note dated 16th August 2022.

Vail Williams responded earlier consultations to the Sonning Common Neighbourhood Plan in November 2021 and March 2022. JM will therefore not repeat the matters raised in these letters as they will have already been taken into account as part of the Examination of the Plan.

We understand this consultation is predominantly in relation the suggestion that the Little Sparrows site should be allocated for residential development and the subsequent schedule of modifications published for consultation. We have no comment to make on the additions to page 14 or 46 referencing the new inclusion of SON24 for 133 units for the Little Sparrows site given the development has been granted planning permission.

JM continues to support the Neighbourhood Plan in the allocation of residential sites including SON23 as a reserve site for the development of approximately 20 dwellings. JM are in the process of undertaking a review of the strategy for the JM sites given the ongoing changes to market conditions however JM continue to be committed to the Sonning Common site. As part of this review this includes consideration of the

LISTEN

CARE



INNOVATE

LEAD

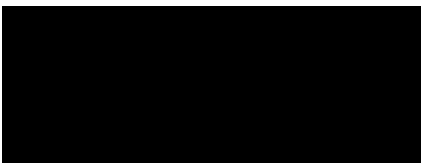


redevelopment of the existing car park site for residential development in line with the draft Neighbourhood Plan allocation.

As an important contributor to the local economy and community, JM will continue to engage with the Parish Council in the future regarding plans and investment in the Sonning Common site at the relevant times as JM have throughout this Neighbourhood Plan process.

If you have any queries on JM's representations or require any further information regarding JM's future aspirations at Sonning Common, please do not hesitate to contact me.

Yours faithfully



[Redacted Name]

Associate

For and on behalf of Vail Williams LLP

Mob: 07554005585

Email: [Redacted]@vailwilliams.com

LISTEN

CARE



INNOVATE

LEAD

Response 13

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 the Coal Authority.

Please see below and attached:

"Further to our previous comments dated 31 January 2022 (attached), I can confirm that the Coal Authority has no further comments to make."

Q3. You can upload supporting evidence here.

- File: 2022-01-31 Coal.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	Planning & Development Manager – Planning & Development Team
Organisation (if relevant)	The Coal Authority
Organisation representing (if relevant)	-
Address line 1	200 Lichfield Lane
Address line 2	-
Address line 3	-
Postal town	Mansfield
Postcode	NG18 4RG
Telephone number	-
Email address	TheCoalAuthority-Planning@coal.gov.uk

From: [The Coal Authority-Planning](#)
To: [Planning Policy S&V](#)
Subject: FW: [External] Your comments are invited on the Reviewed Sonning Common Neighbourhood Plan
Date: 31 January 2022 17:55:32
Attachments: [image001.png](#)

****EXTERNAL****

Dear Planning Policy team


Thank you for your notification of 27 January 2022 regarding the Reviewed Sonning Common 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

[Redacted signature]

 The Coal Authority

[Redacted name]

Planning & Development Manager – Planning & Development Team

T : (01623) 637 281

M: 07769 876 387

E : planningconsultation@coal.gov.uk

W: gov.uk/government/organisations/the-coal-authority

[Redacted address line 1]

[Redacted address line 2]

Response 14

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Individual

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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. Please see below:

"Dear Sirs,

Our democracy is undermined by the manner in which decisions that have been made in this process. I support the concept of neighbourhood plans and feel that they should be valued. Allowing the Little Sparrows development is a travesty of what is meant to be a democratic process.

Unfettered development and uncontrolled greed to build wherever possible, brings total destruction of our environment and our identity as a rural village.

I support the revised plan but with a heavy heart.

Eleanor Pitts"

Your details and future contact preferences

Response 15

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 from DLP Planning on behalf of Inspired Villages.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 2022-10-19 DLP Planning.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	██████████
Job title (if relevant)	Associate Director
Organisation (if relevant)	DLP Planning Limited
Organisation representing (if relevant)	Inspired Villages
Address line 1	4 Abbey Court
Address line 2	Fraser Road
Address line 3	Priory Business Park
Postal town	Bedford
Postcode	MK44 3WH
Telephone number	-
Email address	██████████@dlpconsultants.co.uk

Neighbourhood Planning Team
South Oxfordshire District Council
Abbey House
Abbey Close
Abingdon
OX14 3JE

By e-mail only to: planning.policy@southandvale.gov.uk

Dear Sir / Madam

**Re: Sonning Common Neighbourhood Plan
Response to Sonning Common Neighbourhood Plan Modifications Consultation**

I write on behalf of my client, Inspired Villages, in relation to the proposed modifications to the Sonning Common Neighbourhood Plan. The Parish Council has undertaken further work on the plan and has proposed a series of amendments and updates, which are subject to a further round of public consultation. We wish to provide the following comments in relation to the proposed modifications to the Neighbourhood Plan.

Addition of Little Sparrows as a proposed housing allocation under SON24

The inclusion of Little Sparrows as an allocated site for a community care retirement village (Use Class C2) of up to 133 units with ancillary communal and care facilities and green space is supported. This is in accordance with the planning permission granted on appeal (APP/Q3115/W/20/3265861) and reflects the lawful status of the site.

Map 4.4 – Wildlife corridors through and around Sonning Common

Map 4.4 illustrates the network of wildlife corridors around the village. The Parish Council's response to the Examiner's previous questions confirmed that the wildlife corridors were identified following a survey carried out in 2014. One of the corridors is shown to bisect the Little Sparrows site. This is not supported and should be removed from Map 4.4.

Figure 1 – Extract from Map 4.4: Wildlife Corridors around Sonning Common



The Ecological Report and Map included as appendix 1 and 2 to this letter formed part of the evidence base for the original neighbourhood plan and shows those sites that were surveyed hatched pink. This shows that the Little Sparrows site was not surveyed. Therefore, the inclusion of a wildlife corridor on this site is not supported by evidence and there is no justification for it and should be removed.

As part of the application and appeal process the Little Sparrows site was subject to detailed ecological assessments and which found the site to be of limited ecological value. Indeed, at paragraph 128 of the appeal decision the Inspector noted that the appeal site contains habitats of a lower biodiversity value, which are common and widespread throughout the District. The appeal scheme provides for a net increase in biodiversity across the site, specifically an increase of 51% for the detailed element. Furthermore, the planning permission for a community care retirement village on SON24 includes suitable ecological mitigation and planning conditions that requires compliance with this mitigation. Any future applications (in relation to the outline element of the hybrid permission granted via appeal) would be subject to the same scrutiny in terms of assessments, consultation with the Local Planning Authority and planning conditions could be imposed to secure suitable mitigation, if required.

In the context of the above, there is strong objection to the wildlife corridors shown on SON24 and these should be removed as they are unsupported by evidence, and do not take into account the detailed assessments undertaken as part of the planning process.

Conclusion

To conclude, the allocation of Little Sparrows as a community care retirement village under SON24 is supported. However, the wildlife corridor shown on Map 4.4 that bisects the Little Sparrows site should be removed as this is not supported by evidence and the site has been subject to extensive assessment and surveys, which found the site to be of limited value.

I would be grateful if these comments could be taken into consideration as part of the examination of the Neighbourhood Plan.

If you have any queries, please do not hesitate to contact me.

Yours faithfully

[Redacted Signature]

[Redacted Name]

Associate Director

Encl: Appendix 1 - Sonning Common Ecological Survey 2014
Appendix 2 - Sonning Common Survey Areas Map 2014

Appendix 1 - Sonning Common Ecological Survey 2014

ECOLOGICAL SURVEY,
POTENTIAL DEVELOPMENT SITES, SONNING COMMON, 2014

██████████, Ecological Consultant
Email: ██████████@waitrose.com

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Map 1 - Potential Development Sites (and Existing Woodland)

Map 2 – Areas Surveyed in March and June 2014

Map 3 – Hedgerows and Woodland Boundaries

Appendices

Appendices supplied as Excel spreadsheets, separate from main report.

Appendix 1 – Species Records, March 2014

Appendix 2 – Species Records, June 2014

Appendix 3 – Species Distribution by Survey Area

Appendix 4 – Overall Species Summary Table

Appendix 5 – Summary Table of Survey Areas

Executive Summary

This report summarises the results of a survey of potential development sites in Sonning Common, South Oxfordshire. The survey was commissioned by Sonning Common Parish Council. Fifteen sites were proposed for development in the parish. Eleven of the fifteen sites received one or more visits in March and/or June 2014. The parish is surrounded by the Chilterns Area of Outstanding Natural Beauty – with any decisions about potential development needing to take this factor into account (for landscape and other considerations).

The survey recorded the habitats and species present and assessed the quality of these habitats. The method was simple, a walk over diurnal survey. Most of the species recorded were plants (important in identifying the potential ecological quality of the sites) with other groups including birds, mammals and invertebrates being recorded. A comprehensive survey of species other than plants would require specific targeted methods, potentially undertaken at different times of year or times of day – and beyond the resources of this survey. It is recommended that any such surveys should be carried out if required to inform the process of any actual development of chosen sites.

Sonning Common and its surrounds supports a variety of habitats including woodland, some more open part wooded habitats, hedge or other field boundaries, grassland and agricultural land including a large element of arable. Most of the possible sites are on the periphery of the village in open countryside but there are some more centrally located sites wholly or partially hemmed in by existing development. The landscape east and north of the village tends to be more open with larger fields and fewer hedges or similar field boundaries – with a more structured landscape with smaller fields and hedges to the west and south. Much of the land is subject to intensive management with the better wildlife habitats generally being less intensively or occasionally managed.

There is good connectivity of wooded habitats – especially west and south of the village. Most of the woodlands proper are linked by a network of linear wooded habitats such as hedges and/or lines of trees. In addition, the village itself has numerous trees and hedges – including some large wooded gardens.

Some of the best habitats identified in the survey are the more mature hedge / boundary banks such as those in west of village (SON01, SON02, SON03 and SON04) - these being much more than simple low hedges containing some large / old trees potentially of high conservation value. Towards the south of the village, there are some more open habitats perhaps remnants of a previous more open parkland type landscape (SON06, SON07) including a possible old green lane. These sites are adjacent to Hagpits Wood (one of several woods in or around the parish) and together they form an area of continuous habitats. Good open habitats such as grassland are more restricted, in the areas surveyed at least, being dominated by arable land with only small fragments of more herb rich open grassland. In the event of any development it is important to retain this variety and connectivity of habitats in and around the parish. Where possible, existing habitats should be improved and new wildlife habitats created (appropriate for the local area and conditions).

Introduction

This is a report of a survey of a number of proposed development sites in Sonning Common - each site being designated by the acronym “SON” followed by a unique number. A total of 15 sites were proposed, but not all of them have been surveyed. Eleven of the fifteen sites were surveyed and an additional three additional sites were also briefly surveyed while in the area. These extra sites provide linking habitats between two or more of the proposed development sites and are areas that could be good wildlife habitat and/or support notable species in their own right.

The purpose of the survey was to gain information about the nature and quality of the habitats present, and where the survey method allowed record the presence of any notable or important species and in a wider sense to gain a better understanding of the way the different sites create a set of linked wildlife habitat corridors through the parish. It needs to be emphasised that the survey was designed to gain an idea of the overall value of the wildlife habitats, rather than a comprehensive survey identifying in detail the diversity of species present.

The survey was commissioned by Sonning Common Parish Council.

Survey Dates, Methods and Personnel

The sites were surveyed over two days, 14 and 20 March 2014 with most sites being visited once. The survey method was very simple, walking through the sites recording the types and distribution of the habitats present and a representative sample of the species present. The recorded species groups included plants, primarily as indicators of the quality of the habitats but also in their own right including any unusual or notable species present. The early season nature of the survey means that the list of species recorded needs to be treated as indicative only. Another purpose of the survey was to gather information about the sites as a whole and how they together provide potential or actual wildlife corridors within and through the parish.

The additional survey carried out later in the year (27 June) was intended primarily to gather extra information about some of the more common fauna groups (butterflies and birds) and any other notable species that may not have been present earlier in the year. This latter season survey included most of the sites and a similar survey route to the early season survey.

Most of the records made were for plants but whenever possible records were also made for other species seen and/or the sites looked at with respect to their potential value for other species. Specifically, one or more records were made for amphibians, birds, mammals, invertebrates, fungi and mosses. All of these records (except birds) were mostly incidental records as most if not all groups require more targeted surveys, often using different specialist survey methods at other and/or additional times of year. (Such surveys were beyond the resources and time constraints of this survey.) Birds were the main other group recorded. The early season surveys were undertaken prior

to the arrival of the spring migrants and thus limited to resident species only. Summer migrant species, if present, were also recorded in the June survey.

All surveys were undertaken by [REDACTED] and [REDACTED].

Survey Areas

There are 15 potential designated development areas in Sonning Common. Map 1 shows the location of the 15 potential designated development areas and woodlands. Not all of these sites had been selected (at least at the time of this survey) as potential development sites. Thus following discussion with and by agreement of the Parish Council the resources were concentrated on the sites to the west and south of the parish. In addition to these “main” sites two other additional areas (linking habitats adjacent to two of the sites) were also surveyed for better continuity of habitat information.

Eleven of the fifteen sites were surveyed in March 2014. Ten of these were re-surveyed in June. Map 2 shows the areas surveyed and the survey route used (marked in pink hatching). For survey purposes most of the main sites were broken down into smaller units either by habitat and/or by ground features e.g. footpaths. Table 1 below shows the main survey areas, the number of site divisions and their survey dates. This information as well as a summary description of each of the areas is shown in table form in Appendix 5.

<u>TABLE 1 – SURVEY AREAS AND DATES</u>			
SURVEY AREA	MAIN HABITAT(S)	NUMBER OF DIVISIONS	SURVEY DATE
SON 01	Arable, Field Margins, Hedges	4	14/03/2014, 27/06/2014
SON 02	Arable, Field Margins, Hedges	3	14/03/2014, 27/06/2014
SON 03	Arable, Field Margins, Hedges	5	14/03/2014, 27/06/2014
SON 04	Arable, Grassland, Field Margins, Woodland, Hedges	6	14/03/2014, 20/03/2014, 27/06/2014
Rudgings Plantation	Woodland	1	20/03/2014, 27/06/2014
SON 05	Grassland and Trees	2	20/03/2014, 27/06/2014
SON 06	Pasture and Hedges	3	20/03/2014, 27/06/2014
SON 07	Old Orchard, Green Lane, Hedge	3	20/03/2014, 27/06/2014
SON 08	Grassland	1	20/03/2014, 27/06/2014
SON 09	Grassland, Hedges, Trees	3	20/03/2014, 27/06/2014
SON 10	Arable, Field Margins, Hedges	3	20/03/2014, 27/06/2014
Area South of SON 10	Rough Grass, Rough Herb, Scrub	1	20/03/2014, 27/06/2014
SON 15	Playing Fields, Hedges	2	14/03/2014
11 Main Areas, 2 Other Areas		35 in Main Areas and 2 Other Areas	

Possible Development Plans

The preferred development plans for each of the SON areas had not been finalised as of mid June 2014. Any potential development of areas within and/or adjacent to the Area of Outstanding Natural Beauty (AONB) because of their location have to be considered with respect to their possible impact on the AONB. The sites that have been selected for and/or put forward for some sort of development are listed below.

SON01 – Area within Chilterns AONB. Currently farmland. .

SON02 – Area within Chilterns AONB. Currently farmland.

SON03 – Area within Chilterns AONB. Currently farmland. .

SON04 – Area within Chilterns AONB. Currently farmland. Site withdrawn by landowner.

SON05 – Area adjacent to AONB. Currently grassland.

SON06 – Currently farmland..

SON07 – Existing house and orchard.

SON08 – Currently privately run gymnasium.

SON09 – Area adjacent to AONB. Currently grazing land.

SON10 – Area within Chilterns AONB. Quality exposed site.

SON11 – Area within Chilterns AONB. Quality exposed site.

SON12 – Area within Chilterns AONB. Quality exposed site.

SON13 – Area within Chilterns AONB. Partially exposed quality site.

SON14 – Area within Chilterns AONB. Quality exposed site.

SON15 – Area adjacent to AONB. Currently school playing fields.

Habitat Summary

This discussion is based on the results of the survey of eleven of the fifteen sites and the network of ecological link sites and habitats. When considering the impact of possible development it will be important to look at this network of habitats across and around the entire village.

Woodlands in and around the village include Old Copse, Rudgings Plantation / Bur Wood, Hagpits Wood, Bird Wood, Young Wood, Slades Wood and woodland at Shiplake Hill. Only one of these, Rudgings Wood, was formally surveyed (but only in part) and one other looked at in passing (Old Copse while surveying SON01) in this survey. These sites vary in size from c. 1 hectare (Slades Wood) to Old Copse (c. 17 hectares). Hagpits Wood is a pivotal site backing onto / being adjacent to SON06, SON07 and SON09. The continuity of wooded habitat is created by a network of hedges / tree lines along field and other boundaries – many of which were surveyed as part of this survey. This network of wooded boundaries includes some wide banks including mature trees as well as an under storey of shrubs (e.g. the fine bank on the southern boundary of SON03) to low gappy (over) managed hedges (e.g. roadside hedge of SON10 along Peppard Road) and boundaries marked by a line of mature standard trees (Pines along south west boundary of SON09. Except for gaps for barriers such as roads there is a complex of linking wooded habitat surrounding most of the developed part of Sonning Common. The road network creates a probably un-crossable barrier for some species (e.g. Dormouse) and presents a risk to other species that may use the wooded habitats for foraging (etc) or “safe” movement corridors (e.g. Badger). Evidence for this was a dead (car killed) Badger on the roadside of SON06 – presumably killed while crossing the road between SON06 and SON07 / Hagpits Wood. Map 3 shows this network of woods and wooded boundaries. (The information on the map is based on the field survey, aerial photographs on Google Earth and information supplied by Sonning Common Parish Council)

The open habitats are in the main managed agricultural land including a lot of arable land (e.g. SON10, SON01, SON02, SON03, large part of SON04) and some pasture / grassland. These field habitats are by their nature more discontinuous and in the main relatively poor habitats for wildlife due to their overriding management as productive land. Many of the arable fields have some sort of grassland edge habitats, most of which are narrow and of recent origin and/or agriculturally improved. The best areas of grassland habitats surveyed in this survey were the disused (and thus long grass) paddock of SON05 and the nearby narrow but apparently herb rich grass margin along the old field boundary of SON04. To the south of the village is Kennylands Millennium Green, an area of grassland managed in part for nature conservation (but not surveyed in this survey). Other intensively managed grassland habitats (e.g. SON09, SON15) may or may not still include areas of better (more herb rich) turf - but their current management is too intensive to gauge their true value. After long periods of management they are likely to be of lower value for wildlife even if their current management regimes were to be relaxed.

There are also relatively small areas of mixed habitat that are neither heavily wooded, or open - e.g. the small area of old Orchard in SON07, fairly open quarry (south of and adjacent to SON04) and old green lane (part of the old parkland landscape in SON07).

Also of note north of the parish is Peppard Common (one of the eight commons that make up the Nettlebed Commons), a mixed area of open and wooded habitats, including some county rare acidic habitats including areas of heathland as well as areas of managed grassland.

Some of the SON sites are located within the boundary of the AONB, with their value being typical of gentle rolling landscape. It is interesting to observe that due to the intensive nature of their management the value for nature conservation for such landscapes is not necessarily as high as it might be and measures could be adopted that would significantly improve their status for nature conservation.

Summary of Species Survey Results

The survey results are summarised in written form in this section of the report. The full species results are provided as excel spreadsheets as Appendices 1 (March 2014) and 2 (June 2014). These raw records have been processed to produce a detailed species summary table (Appendix 3) which in turn has been reduced to a summary table showing the number of species by species group e.g. amphibians, plants (Appendix 4).

Overall from all the survey areas the following species were recorded: 131 plants, 28 birds, 17 invertebrates, 6 mammals, 2 fungi, 1 moss and 1 amphibian. No rare or uncommon species were recorded but some species (e.g. the summer migrant bird Whitethroat. and the “farmland” mammal Brown Hare) are of conservation concern.

The best areas in terms of the total number of species recorded were as follows: SON 03 (71 species), SON 05 (70 species), SON04 (67 species), SON 01 (57 species), SON 02 (45 species) and SON 06 (43 species). The other 5 main sites had records for 35 to 21 species. SON 01 to SON 04,

The complex of four sites in the west of the parish are included in the top six sites – in part probably because they include a concentration of and fine examples of old mature boundary bank habitats. Another factor for the relative richness of these areas is their location on the edge of the parish away from the more disturbed and/or developed parts of the parish.

A summary of the records of the species groups follows. For the groups with species records the best sites are as follows. For Amphibians there was one incidental record – i.e. Common Frog heard breeding in a garden pod adjacent to one of the main sites. (For the record no reptiles were recorded.) The best bird areas (between 15 and 10 records respectively) were SON 03, SON 01, SON 02 and SON 04. Fungi were only recorded on an incidental basis with a single species for two of the areas. The best area for invertebrates, primarily early season over wintering and mid-season butterflies, were SON 05 (11 species), SON 01 and SON03, SON 02 and SON10 respectively. The best areas for mammals (as far as obvious field signs and casual sightings can be relied on) were SON 05, SON 01, SON 02, SON 06 and SON 10. By far the best two areas for plants were SON 04, SON05 and SON03 (53, 48 and 46 species respectively), then SON 09, SON 06 and SON 01 (all low 30’s).

It is noticeable in the above simple analysis that though areas other than SON 01 to SON 04 support relatively good numbers of particular species groups, the western complex of sites appear to be the richest wildlife areas overall. However, it needs to be emphasised that the survey was primarily carried out very early in the season and for most species groups was at best indicative and for many species groups inadequate. This is true even for plants (the best recorded species group) which were relatively well but not comprehensively recorded in this survey. Generally, woodland habitats are more likely to be better recorded in the early part of the year than grassland habitats. To a great extent all the fauna groups are under-recorded, with the more secretive species most under-represented. Better records for these and other species would require targeted surveys.

Review of Fauna

This section reviews the actual species records made and considers other species that could be present should more extensive and/or targeted recording be undertaken.

Mammals

Evidence of the presence of six species of mammals was recorded in this survey, all species being common and widespread. These are two species of deer i.e. Muntjac and Fallow, both species of Lagomorphs i.e. Rabbit and Brown Hare, and two common carnivores i.e. Badger and Fox.

Other ubiquitous species not recorded in the survey that will undoubtedly have been present in one or more of the survey areas where suitable habitat exists include small mammals such as Mole, Common and Pigmy Shrews, Field and Bank Voles and Grey Squirrel. Another possible small mammal species that could be present in the woodlands is the Common (or Hazel) Dormouse for which there are many local records e.g. woods and wood edges in Nettlebed, Woodcote and Stoke Row. The species is not uncommon in the Chilterns. As well as this native species there are historic records for the non-native Edible Dormouse in Sonning Common itself. Hedgehogs appear to be mostly species of suburban and urban habitats – perhaps due to predation by Badgers in more rural habitats which are now much more common than historically. They may or may not be present in the farmed areas beyond the developed part of the village.

Roe Deer, which has also in the last two decades become much more common, is the other species of deer that is likely to be present. All three deer species are now so common and cause problems in local woodland and probably other habitats by their heavy browsing damaging trees and woodland plants – and on some sites the damage being so bad that some species are being lost.

Apart from Badger (with signs of presence in five areas) and Fox (one area) the other common predators not recorded were the two smaller mustelids – the Weasel and Stoat. These species are normally seen in more open habitats and wood edges where their prey species live. There is abundant habitat for them in many of the survey areas. It is also possible that Polecat is present in the Parish –

having re-colonised Oxfordshire in the last two decades from its former stronghold in western Britain.

No bats were recorded in the survey; records will require nocturnal surveys for foraging sites and potentially other surveys (dusk and/or dawn) surveys to confirm any potential roost sites. Diurnal surveys can be used to identify potential roost sites including holes or cracks in trees or other habitats such as dense Ivy. No such surveys were undertaken in this survey. The most likely sites for bat roosts will be larger and/or older trees which have had time to develop rot holes and other suitable niches for bats.

Hence perhaps the best possible tree roost sites identified in this survey are large / old trees such as those in the old field boundaries around SON03 and other areas. More recent boundaries with dominated by small shrubs and/or younger mostly “undamaged” trees are less likely to provide bat roosts. Bats prefer continuous habitat for foraging and thus a good network of linked hedges and woodland. It is not just the trees that are important but open areas and a diversity of type and size of trees and shrubs – with abundant flying invertebrates.

Birds

Twenty eight species of bird were recorded in the survey including both resident species and spring / summer migrants. A more comprehensive bird survey could easily result in c. 40 to 50 species of these types of species with additional winter visitors and vagrants / casual species (e.g. gulls) also being possible. Eight of the 28 species are included in the list of Birds of Conservation Concern (2014, BTO *et al*), four on the Red List and four on the Amber List. The list of Birds of Conservation Concern includes some species that are still relatively common and/or widespread but have suffered significant declines in their populations – which therefore need to be monitored to assess their status and any further declines. There are two categories – Red species have suffered the biggest losses and are potentially mostly threatened and Amber list the lower risk / changed species.

Invertebrates

The sheer diversity of invertebrate species means any surveys will always be incomplete and, unless specialist surveyors are employed, necessarily concentrate on the more popular species groups such as butterflies – using these better known species as indicators (as best as possible) of the quality of the habitat. Eleven species of butterfly were recorded in the surveys in March and June. Five of these were longer grassland species (members of the Brown family including Marbled White and two Skippers), a shorter sward species (Small Heath) and five generalists (e.g. Peacock, Small Tortoiseshell) including probable migrant species from Europe as well as resident individuals.

The “missing” species include more specialist grassland species typically found in shorter more herb rich sward e.g. Dingy and Grizzled Skippers. Many of these species are uncommon and confined to better quality habitats. More survey work would have been needed for these species - which are likely to be less common anyway as the area of suitable habitat in the survey areas is limited. The other “missing” group are the woodland specialists which again would have been flying at different

times of year and require more targeted surveys. Some of these species will undoubtedly be present in some of the wooded areas in Sonning Common – e.g. Purple Hairstreak which lives on Oaks and perhaps White Letter Hairstreak on Elm. No records were made for the normally common and ubiquitous Speckled Wood, another member of the Brown family (*Satyridae*).

Amphibians and Reptiles

Only one incidental record was made for these groups – spawning Common Frogs being heard in a garden pond adjacent to one of the survey areas.

No ponds were recorded in the survey, reducing the likelihood of finding amphibians due to the lack of breeding sites. Amphibians in terrestrial sites outside their breeding season are secretive and not easy to record. The species of amphibian most likely to be present in the area are Common Frog, Common Toad, Smooth (or Common) Newt and perhaps Palmate Newt. The latter is rare in Oxfordshire as a whole with its stronghold in clay cap ponds in the Chilterns in South Oxfordshire. Palmate newts were (and probably still are) present for example in ponds on the nearby Kingwood Common.

Reptiles are generally very secretive, except perhaps at particular times of year or times of the day when they may spend time sunning. The most likely species to be present in the survey areas are Slowworms (which mostly shelter in dense cover rarely in the open) and Grass Snakes (widespread but not necessarily common). Common Lizards are known to be present in the local area (Peppard and Kingwood Common for example) but are generally not common and not necessarily present in any of the survey areas. The other local species the Adder is now very rare in the county (verging on extinction) and believed to be lost from the area though there are unconfirmed records for the Sonning Common area (possibly misidentified Grass Snakes).

Habitat Survey Results

Results Format

Each survey area is described in turn (in survey order number) under 5 headings (listed below). A summary description for each of the survey area divisions and their locations (grid reference) can also be found in Appendix 4:

- Summary Description – Brief description of the main habitats present and their relative value for particular species groups and/or wildlife in general.
- Overall Value for Wildlife – Short statement about the known value of the site for wildlife based on the survey results using both the species and habitat records.
- Potential Species Interest – The potential value of the site for species that could not be recorded due to the limitations of the date of the survey, survey methods and/or available resources. These species groups include protected species such as Bats.

- Suggested Management – The suggested management approach for the habitats to ensure their best condition for wildlife without (as far as current information allows) compromising their current function(s). The actual management of any site as used by the land manager will be informed by the type of habitat and by practical and other considerations (e.g. financial) including in some cases overriding functions other than nature conservation. *It should be noted that the management control of all the sites remains with the owners or their agents and any suggestions for management in this report are just this.*
- Suggested Mitigation – This section outlines any suggestions for specific approaches to maintain or enhance (where possible) the wildlife interest of the sites and their role in the wider network of wildlife link habitats - *should all or part of the sites be developed*. In advance of any proposed or final development plans these suggestions are at most provisional.

Notes On Suggested Management

Site management is undertaken for a variety of reasons with management targeted for nature conservation only one of many possible functions. All the sites included in this report are managed by their landowners for a variety of reasons and any suggestions made are intended to enhance the nature conservation value of the sites.

Managing sites for wildlife is not necessarily the same as managing them for other reasons, though there may be a large overlap in actual management tasks undertaken. For example, the methods used may be the same as for other agricultural or other reasons, but undertaken at different times of year and/or at different intensity to other (perhaps commercial) operations.

Mitigation Guidelines

In the absence of any actual development proposals it has not been possible to provide any site specific mitigation advice, but there are a number of general principles that should be followed in the event of any development. These include the following:

- Given the ongoing continued reduction in sites and habitats that are good for wildlife, effort should be made to reduce the loss of and/or damage to all species and sites - not just protected species where there is strong legal requirement to do so and/or known higher quality habitats or sites designated for nature conservation.
- All sites should be subject of more detailed surveys, including if required targeted surveys for species groups not likely to be found in a general survey using simple visual based survey methods. All surveys should be carried out using appropriate methods, at the correct time of year for the target species and/or weather conditions..
- Once the ecological value of each site has been established, if at all possible the better areas for wildlife should be retained and during any development these areas protected from potential damage.

- Habitats and species should only be trans-located and/or recreated as a last resort. *In situ* conservation is the best option as long as the habitats concerned (including wildlife corridors where needed) are still viable in the changed / new landscape.
- The impact of the proposed development on the remaining areas of wildlife habitat needs to be assessed - including often difficult to define post development long term impacts such as increased levels of disturbance from greater public access. Compensation measures could include buffer zones or other measures necessary to reduce any future impacts on the better wildlife habitats.
- Any habitat creation should ideally be carried out using native local species, where possible obtained from local sources. The created habitats should be appropriate for the geographical area, be sustainable in the future with sufficient resources available for their ongoing management including any establishment phase.

Individual Survey Area Summaries

Area SON 01

Summary Description: This area is a large arable field surrounded by a rough grass margin with in places a mature well developed boundary habitat. The area was divided into five areas for recording purposes (two being amalgamated into one description here). The main part of the area (the large central ploughed area) was not surveyed.

South Boundary: The eastern part of the southern boundary is a mature planted hedge dominated by Hawthorn with Elder and Cherry and abundant Ivy. To its west the boundary is made up of a much deeper wider planted mostly deciduous wooded strip including mature trees over a sparse cover of rough ground plants. The trees include a number of large mature Sycamores with smaller trees such as Holly and other Sycamores. Along the field margin there is a strip of rough species poor grassland, c. 5 metres wide.

West Boundary - South and North of Footpath: For recording purposes this boundary habitat was broken down into two sections, south and north of the public footpath. The south section is a mature deciduous tree line (especially Cherry) including an equal width rough grass strip between the trees and ploughed area, in total both being c. 15 metres wide. The ground flora is heavily shaded and consequently locally very sparse including a lot of Lords and Ladies with Nettle, Hedge Parsley and Cleavers. North of the footpath the hedge runs parallel with power lines and (recently at least) has been cut back to create an open corridor for the wires. English Elm is locally dominant in this section with Hawthorn being common. The most northerly part of the boundary is contiguous with Old Copse and shares some of the characteristics of this wood.

North Boundary: Relatively narrow rough grass strip adjacent to residential gardens, some with formal low mostly regularly managed hedges. More mature typical hedgerow shrubs and trees are mostly absent. There are some garden escapes and typical species of disturbed grassland, for example cultivated Geranium and American Bramble.

East Boundary: Relatively narrow rough grass strip adjacent to residential gardens of newer housing with (as the North Boundary above) very little old hedge shrubs. There are formal garden hedges in some of the adjacent houses (species including Beech, *Leylandii* and some Bramble). The southern end of the boundary however does have a short length of remnant *Prunus* hedgerow growing in the field margin.

Overall Value for Wildlife: The best existing habitats for wildlife are the mature boundary hedges / tree lines along the south and west margins of the field. The northern part of the western boundary also forms the southern section of the eastern margin of Old Copse, an area of old Chiltern plateau woodland. The other (east and north) boundaries alongside the adjacent modern housing estates are mostly recent habitats of rough grass relatively and species poor margins with a more limited value for wildlife.

Potential Species Interest: The main part of the site, the arable field was not surveyed. There are many species of plant associated with arable fields with among them a number of uncommon and rare species. A full survey of the field would be needed to identify any such species present. The mature field boundaries are good quality habitats suitable for many species, including a wide variety of animals. These could include bats at least for foraging habitat, though the general age of the trees is such that good roost sites will not be common. The western and southern boundaries also provide potentially good corridor habitats.

Suggested Management: No change in the current management regime is suggested. The non-intervention or limited intervention approach to the management of the mature field boundaries is good for wildlife. There is scope to improve the eastern and northern field margins, for example by the planting and/or encouraging the natural colonisation of native local shrubs and a greater diversity of plants and thus potentially other species.

Suggested Mitigation: In event the site is developed, it will be very important to protect, retain and enhance the existing mature boundary habitats along the western and southern boundaries, if possible improve the other boundaries and create additional wildlife habitat should circumstances allow. The quantity and type of wildlife habitats included will in part be controlled by the type and extent of development.

Area SON 02

Summary Description: This area is a large arable field with three of its boundaries included in the survey area – therefore it is divided into three survey areas. (The fourth boundary hedge is included in SON 03.) As with SON01, the main part of the area (the large central ploughed area) was not surveyed.

West Boundary: The western boundary is made up of a mature strip of relatively recent planted mostly deciduous trees, including Wild Cherry, Oak, Beech, Alder, Birch, Lime, Holly etc. The ground cover is fairly sparse and species poor made up of typical wayside species such as Nettle and Hedge Parsley. Ivy is common on the trees and ground – suggesting a secondary origin and/or significant amounts of disturbance.

North Boundary: The western section of the northern boundary is a continuation of the Hawthorn dominated hedge to the west (SON01 South Boundary). Ivy is abundant. There is a rough species poor grass strip between the hedge and ploughed part of the field. The shrubs / trees in the eastern section of this hedge have either been (mostly) removed or were never present - and it is currently dominated by rough grass and herbs with Bramble being locally dominant. There is also a stand of Bracken. The original shrubs are apparently present again at the eastern end of the hedge. There is a single established Primrose plant (garden escape) in this part of the boundary. A colony of House Sparrows was apparently resident in this hedge, one of only two records for this species in the survey.

East Boundary: The eastern boundary is made up of a strip of rough grass and herb which backs onto garden fences of the adjacent modern houses. The garden hedges include Holly, Cherry Laurel, cultivated Privet (including some variegated) and cultivated *Lonicera*. Bramble is locally common. There are some smaller escaped garden plants - most notably Spanish Bluebell in two separate locations.

Overall Value for Wildlife: The best existing habitats for wildlife are the existing western and northern boundaries. The remaining habitats are apparently of lower value for wildlife.

Potential Species Interest: The main part of the site, the arable field was not surveyed. There are many species of plant associated with arable fields with among them a number of uncommon and rare species. A full survey of the field would be needed to identify any such species present or any other species typical of this habitat (e.g. farmland birds).

Suggested Management: No changes in the current management regime are suggested. The non-intervention approach to the management of the mature field boundaries is by default good management. There is scope to improve the eastern field margins, for example by the planting and/or encouraging the natural colonisation of native local shrubs and improving the quality of the grassland habitats.

Suggested Mitigation: In the event the site is developed it would be important to retain and enhance the existing mature habitats along the western and southern boundaries - and ideally create additional better boundary and/or internal habitats elsewhere. The quantity and type of habitats that can be maintained and/or created will be controlled by the type and extent of development.. The subsequent management of these habitats and any planned access should be designed to minimise these impacts.

Area SON 03

Summary Description: An arable field surrounded on four sides by boundary hedges and grass margins. The boundary was divided into five recording areas, with the main part of the site (ploughed arable) not surveyed.

North Boundary: This boundary has been included in SON03, but equally could have been included in SON 02 (as SON 02 South). It is a tall mature hedge dominated by Hawthorn with Field Maple, Holly, Elder, Dog Rose and some Bramble. The hedge includes Ash standards and some Ivy. There is a relatively narrow species poor rough grass margin on both the north and south sides of the hedge.

East Boundary: This boundary is made up of a strip of rough grass and herbs which backs onto a relatively undisturbed fenced 8 metre wide access strip behind the adjacent modern houses. This fenced strip includes a strip of mixed native and non-native shrubs including Hawthorn, Field Maple, Rose sp. and Garden Privet. Bramble is locally common. The grassland strip was not accessible from the field and thus not surveyed – but appeared to be species poor and dominated by rough grass.

West Boundary: Strip of close spaced mature planted Poplars with abundant Ivy on the trees and ground. The Poplars have been planted adjacent to a pre-existing hedge with smaller trees including Hawthorn, Elder and regenerating English Elm. Ground plants include mostly common rougher wayside species but also a few species of more mature habitats. Mistletoe grows in two of the trees. The field edge is a strip of rough species poor grass c. 5 metres wide. This strip is dominated by rough grasses and herbs including abundant Nettle and Bramble - with small Poplar suckers being locally abundant. The northern part of the hedge includes a number of large mature trees including Walnuts and Sweet Chestnut.

North West Boundary: This relatively short length of boundary is a more or less open fence line with scattered shrubs (Elder and Bramble) which are more continuous at its eastern end (where it joins SON 02) and overall equal amounts of rough wayside vegetation. The rough grass margin between the fence and ploughed area is c. 4 metres wide.

South Boundary: Old mature boundary (ditch and bank) topped by large mature deciduous trees (Oak, Ash etc.) including some large specimens over a mature under storey of shrubs including Hazel, Hawthorn, Blackthorn, Elder and Spindle where light allows. Ivy is not uncommon on both tree and ground. There is a variable width rough grass margin along the field margin - relatively narrow at the western end of the hedge (5 metres) but much wider to the east (up to 15 metres) – here wide enough to include two mature isolated Goat Willows. The eastern end of the hedge includes a wide margin of smaller woody growth including a dense patch of Birch saplings. The hedge ground flora includes some typical woodland species such as Bluebell. The grassland strip is dominated by rough grasses with only a few herbs - with common wayside herbs being dominant.

Overall Value for Wildlife: The best existing habitats for wildlife are the existing western and southern boundaries – with the northern more recent boundary being of reasonable value. The remaining habitats are apparently of lower value for wildlife.

Potential Species Interest: The main part of the site, the arable field was not surveyed. There are many species of plant associated with arable fields with among them a number of uncommon and rare species. A full survey of the field would be needed to identify any such species present.

Suggested Management: No changes in the current management regime are suggested. The non-intervention or limited intervention approach to the management of the mature field boundaries is good for wildlife – hedges do not need to be managed as short habitats managed by regular cutting or laying.

Suggested Mitigation: In the event of all or part of the arable field being developed it will be important to retain undamaged the older and well established boundary banks with their mature trees and associated wildlife. It would be best if an undeveloped buffer zone was retained between the developed part of the site and these boundary banks. The development could allow the inclusion of some areas of grassland specifically created and managed for wildlife (e.g. sown species rich swards) and wood edge / scrub habitat. Appropriate management regimes would need to be devised to maintain such habitat value and, ideally, resources made available to monitor their condition and inform their ongoing management.

Area SON 04

Summary Description: This area is dominated by recently sown grassland with an old established boundary hedge including some large older trees along the boundary to the north. The western part of the site is a smaller mature permanent paddock surrounded on all sides by wooded boundaries. At this end of the site is a wide north – south mixed deciduous woodland strip. The surviving margin of grass between the planted field and hedge is a narrow strip of fairly species rich grassland – evidence perhaps of a previous species rich sward prior to the conversion to the field to a more intensive arable crop.

West Hedge: Locally steep south facing more or less north south orientated wooded bank with relatively narrow strip (c. 4 metres wide) of unploughed grassland at the bottom of the bank. Hedge trees include mature Oak, Ash and Field Maple and under storey shrubs including Hazel, Blackthorn and Bramble. Climbers include Ivy and Wild Clematis. Under the dense canopy a relatively sparse woodland ground flora includes Dogs Mercury, Lords and Ladies, Wood False Brome - with the grassland strip dominated by rough grass (False Oat Grass suggesting the strip is mostly unmanaged) but with some herbs and disturbed ground plants. (The surrounding habitats include grass paddocks to the north and a sown grass ley to south.) A clump of Stinking Iris grows in the hedge (a probable garden escape).

Central Hedge (East of Footpath): Continuation of West Hedge (described above), with greater number of larger trees dominated by Ash, with a good variety of under storey shrubs including suckering Elm, Field Maple, Elder, Hawthorn, Hazel, Spindle, Wild Privet, abundant Ivy and Bramble. Numerous small planted (mostly dead) Oaks have been planted along the leading edge of hedge. (This planting is inappropriate in nature conservation terms as the hedge needs no additional trees.) Ground plants in the hedge include some typical woodland herbs such as Greater Stitchwort and Dogs Mercury. The grassland strip includes some typical chalk grassland herbs such as Bladder Campion, Wild Basil, Hedge Bedstraw with dense patches of rough grass (Cocksfoot, False Oat Grass). This flora suggests the field was formerly unimproved chalk grassland.

Eastern Hedge (Including Adjacent Chalkpit): The western part of this section is a wide wooded band and hedge (as above) - grading to the east into a narrow Hawthorn hedge with very narrow grassland bank (remnant chalk grassland) along the edge of the abandoned wooded chalk pit to north. The Chalk Pit is open woodland dominated by mature Ash with a lot of bare ground. There is a scattered under storey of smaller shrubs (Elder, Hawthorn) over a sparse ground flora including Lords and Ladies and Dogs Mercury. There is a stand of (planted) mature Scots Pine and Norway Spruce to the east of the pit. Red Kites were present in and calling from a tree in the pit - a possible nest site? There is a Badger sett on the upper part of the north bank of the pit.

Western Paddock: Intensively managed species poor short grassland paddock - probably both grazed and cut regularly. No access was gained, the field was surveyed from the adjacent area.

Western Paddock, North Boundary: Mature tree covered old steep south west facing boundary bank with more or less no under storey (cut down or grazed out) with some surviving ground cover of woodland / shade loving plants. No access was gained and the area was surveyed visually from a distance.

North-South Woodland Strip (Southern Boundary of Western Paddock): North / south strip of mostly deciduous trees and under storey of smaller shrubs, with a total width of c. 10 metres wide. There is a relatively sparse ground flora of mostly native woodland and/or shade loving plants. In places the strip is being used as dump for animal bedding etc from the adjacent paddocks. There is a small mostly dry ditch fed by water draining off / from around the Western paddock shelter.

Overall Value for Wildlife: This area includes a good variety of old or well established habitats forming a long linear more or less north south strip including a good range of both plant and animal species. It is a good site for wildlife, despite being rather hemmed in by the more intensively managed field.

Potential Species Interest: Additional surveys later in the year would probably identify additional species, including species such as bats which require more targeted surveys. There is, for bats, good foraging and potentially roost sites in the more mature trees on the site.

Suggested Management: For the main part of the site (not the Western Paddock or Quarry) the more woody / scrubby lower part of the main hedge bank will in time continue to spread into the narrow strip of surviving grassland. Without management this grassland will also become increasingly dominated by coarser taller grasses such as False Oat – with the subsequent loss of the smaller

remnant grassland plants. Occasional sensitive cutting of both habitats would slow down these successional changes. The more mature parts of the hedge bank require no regular management.

Suggested Mitigation: Development of this site runs the risk of the destruction and/or damage of some or all of this bank and subsequent loss of some long standing wildlife habitats. There is also the risk, even if retained in its entirety, of it being isolated from other areas unless links to other habitats (e.g. Rudgings Plantation to the south) are retained. If development was to happen the sustainability of the habitat would be improved by the addition of an extra buffer strip in what is currently intensive crop, this strip potentially including at least an element of herb rich grassland – a probable previous habitat. Resources would be needed to ensure any such management could be managed in the future.

Rudgings Plantation

Summary Description: Rudgings Plantation was included as an extra survey site because it forms a strategic linking habitat between SON 04 and SON 06. Only the western part of the wood was surveyed.

Western Section: Linear block of open woodland continuous with and south west of SON4. Apparently recently managed (thinned) woodland with a structure made up of well spaced fairly evenly sized trees with Ash and Sycamore common and also Oak and Field Maple and the occasional Scots Pine - with a sparse under storey of shrubs including Elder. The area may well have been the subject of recent felling / thinning. The ground flora includes a few woodland species such as Dogs Mercury, Bluebell and Lords and Ladies but is apparently not a rich woodland flora. There is an active Badger Sett at the top of woodland, adjacent to the field which includes SON 06.

Overall Value for Wildlife: Only a small part of this woodland was surveyed and it is not possible to fully quantify the value of the wood from this survey. However the initial results suggest the wood is not particularly species rich.

Area SON 05

Summary Description: Long grass disused (former horse grazed) paddock set back from the road, accessed via a strip of land c. 16 metres wide between two properties. Area divided into two parts for recording purposes – the access strip off Kennylands Road and the grassland paddock itself.

Access Strip, Off Kennylands Road: Part tree covered and part open east west strip of land c. 16 metres wide, access route for grass paddock – with power lines also following part of the route. The boundaries with the adjacent properties are tree and/or hedge lined - with some larger trees at the east (road) end of the strip. More or less open at its west end, including some (small) disused beds used for cultivation.

Grassland Paddock: Currently unmanaged long rough grass and tall herb paddock, formerly managed as horse pasture. Early season survey and lack of recent management means the variety of recorded plants and overall number of recorded species of all groups may be incomplete. In June, for

example, the field supported a large number of the relatively uncommon grassland butterfly, the Marbled White and good numbers of the more common Meadow Brown and Ringlets (many more than the field margins on the other sites). There is a low lying (dry) hollow on the eastern (upper) part of the paddock dominated by rough plants, including nettle and tall herbs such as wayside Umbellifers (Hogweed and Hedge Parsley). In the lower part of the paddock is a small fenced off area planted with trees, and another area in the south west corner of the site used for dumping compost etc. There are other grazed paddocks to the south east of this neglected paddock.

Overall Value for Wildlife: The survey to date is insufficient to provide a true assessment of the main grassland paddock – and more survey work is recommended to record other species that may be present including invertebrates such as butterflies or other species groups as potential indicators of its value for these groups. Initial results suggest the lack of recent grazing has reduced the abundance of some species and overall diversity of plants – or at least created a more localised distribution on site.

Potential Species Interest: With better management this field could prove to support a more diverse range of species of plants and animals. For example the June survey found four species of grassland butterfly –all long grass species. A mixture of sward heights would also support and encourage good numbers of other grassland butterflies such as the Common Blue with larval food plants associated with shorter swards.

Suggested Management: Intensive horse grazing, the presumed previous management is not ideal for nature conservation purposes. A less intensive regime allowing some areas to grow long including some as over wintering habitat – yet enough grazing to create and maintain short herb rich parts of the sward with larger more competitive grasses and herbs controlled.

Suggested Mitigation: In the absence of sufficient ecological information about the site no specific suggestions for site mitigation can be made.

Area SON 06

Summary Description: Proposed development site located in eastern part of arable field, presumably to be accessed through the road side woodland strip along Kennylands Road.

North West Hedge: Boundary hedge adjacent to house and garden of neighbouring property. The hedge is dominated by mature trees and shrubs to the south but is more open to the north with fewer trees. The trees include Field Maple, Hazel, Elder, Hawthorn, Holly and Scots Pine - with a ground cover of Bracken, Lords and Ladies, Bluebell and Ground Ivy. There is a wide rough grass margin between 8 and 14 metres wide between the crop and hedge. The upper section by the house is dominated by Bramble, with some more disturbed ground plants including naturalised Greater Periwinkle (garden escape).

Rough Grass Margin: The rough grass margin includes occasional species more typical of more permanent swards, but mostly species of rough habitats including Ragwort, Hogweed, Broad Leaved Dock, Wood Aven, Common Mouse Ear and Common Catsear.

North East Hedge: Roadside woodland strip c. 5 metres wide dominated by Sycamore, with other woody species (Ash, Field Rose) being more common to the south east. The mixed ground flora consists of woodland species (with locally abundant Bluebells, Lords and Ladies and Dogs Mercury) and typical wayside plants (Ground Elder, Rough Meadow Grass, Cocksfoot) and a few disturbed ground plants. There is a colony of the garden escape Greater Periwinkle. Ivy is common and Bracken present in places. Badgers (there was a dead road kill adult) and Muntjac (tracks only seen) use the woodland strip for access. Both the latter species are widespread and common.

Overall Value for Wildlife: The best part of the site for wildlife is the long Sycamore dominated woodland strip. The field itself is intensively managed and apparently species poor.

Potential Species Interest: The site as whole is used by mammals such as Badgers and probably by bats for foraging though probably not for roosting as the trees appear to lack suitable habitat niches.

Suggested Management: There is scope to improve the roadside woodland given its rather uniform structure (see below for suggested methods) and narrow width. No management changes are suggested for the main field, given its primary function as a commercial agricultural field.

Suggested Mitigation: In the event of the site being developed it is suggested the woodland strip is protected from damage and plans put in place to enhance its value for wildlife. The two main enhancements would be a significant increase in its width and management to diversify its structure and perhaps its species composition. The latter could include the felling / coppicing of some of the tall Sycamore trees and the planting of additional shrubs and/or small trees using local native species. Should the site be adopted for infill housing the development could include the use of native shrubs in new garden hedges, wildlife friendly landscaping in the open areas between houses. One or more wildlife corridor should be created between Rudgings Plantation and the road to allow the movement of animals such as Badgers.

Area SON 07

Summary Description: Possible remnant of former more extensive parkland landscape, now part developed as residential developments to north-west and south east. Current habitats include a mature roadside hedge, and old orchard of mature or over mature trees and a probable old green lane.

Old Orchard: Old mature orchard with a small number of remaining trees with ground plants dominated by rough herb including nettles. The area is fairly heavily shaded by the tall roadside trees to west and the trees / mature hedge on the opposite garden boundary to north and east (the latter including some non-native conifers). The diversity of ground flora is apparently low.

Old Green Lane: More or less east west strip of land with scattered larger trees - probably a surviving remnant of former open parkland landscape. The green lane continues eastwards along the southern edge of SON 09. In one location the lane is crossed by a remnant section of more or less north - south orientated avenue of Limes. Ground flora not rich, but includes a few typical older woodland species such as Bluebells - surviving species which have perhaps in part spread in from the older boundary bank.

Roadside Hedge: Hedge line consisting of and dominated by large mature deciduous trees growing on a subsequently shaded bank, with a rather sparse ground flora

Overall Value for Wildlife: The results of the survey suggest the species diversity of the site in terms of plants at least is not high – but see below.

Potential Species Interest: Despite being rather hemmed in by adjacent residential properties and shaded by surrounding and internal trees overall the habitats of SON 07 may be more species rich than the survey suggests. Further survey work is suggested.

Suggested Management: No specific management is suggested as there is currently insufficient information about the habitats on site. However, one aspect for the old Orchard that would perhaps be beneficial is the reduction of shade by the removal / cutting back of some of the surrounding trees, especially the non-native conifers on the internal boundary hedge with the adjacent garden.

Suggested Mitigation: In the absence of any specific plans for the site and insufficient ecological information about the site no specific suggestions for site mitigation can be made. Though not managed at present the area provides a wildlife link between the more open habitats to the north and more enclosed habitats to the west (including SON06 and SON05). Though Hagpits Wood to the west provides another link the entire loss of all the part open habitats in SON07 would not be ecologically desirable. There is insufficient information to gauge the value of the site, though habitats of this kind can be very valuable. Features on particular note could be the old / mature standard trees and the old fruit trees.

Area SON 08

Summary Description: Open landscape of mostly regularly short mown grass surrounding a relatively new building, with bare areas used for car parking. Area recorded as one unit.

Thames Valley Gymnastics Centre: More or less open area of managed (regularly mown) grass surrounding the site buildings with bare hard standing areas used for car parking. Occasional trees present, including surviving trees of the habitats prior to the building of the Centre. Boundaries mostly open except for one short length of recently planted low hedge along the south boundary and low formal garden hedges along part of western boundary. The eastern part the northern boundary (with SON 9) is dominated by dense Bramble. The site includes three grassy mounds of varying size, presumably spoil created during building works. The largest mound is located in the north east corner of the site. The north-west boundary of the site where it merges in with the most recently built residential properties is unclear.

Overall Value for Wildlife: Under the current management regime, the overall value of this site is low. The grassland sward was semi-improved, supporting / retaining some variety of species but regular hard mowing reduces its value for wildlife.

Potential Species Interest: Under its current management regime this area is not likely to support a great diversity of species, though as all the areas surveyed it will be used even if only in passing by more species than recorded so far.

Suggested Management: There is a relatively large area of short mown grass which if not used for any other activity could be cut less frequently and/or less hard and some species allowed to flower – creating better wildlife habitat. The relatively poor boundary hedges could be enhanced and additional hedges created on the boundaries where there are none. There is scope to plant some local native small trees or shrubs, without compromising the area used for car parking. (Large tree species should be avoided.)

Suggested Mitigation: In the absence of sufficient ecological information about the site no specific suggestions for site mitigation can be made.

Area SON 09

Summary Description: Area dominated by large area of open short grassland divided into numerous smaller horse paddocks. The western boundary consists of a line of mature Pine trees, and along the southern edge an old green lane (the continuation of the feature in SON 08). The eastern boundary along Kennylands Road consists of a mature hedge with numerous trees. The area was divided into three parts for survey purposes.

Horse Paddocks: Intensively managed short grassland paddocks grazed by horses. The paddocks were not accessed but viewed from Area SON 09 to the south and Kennylands Road to the east.

Old Green Lane: Part grazed, part un-grazed (where fenced off) continuation of Green Lane (see SON 07) ,dominated by tall mature trees with shaded subsequently sparse ground flora. Trees include old and dying specimens especially where damaged by grazing animals. The ground flora includes a small number of typical woodland / shade loving plants including Bluebell. The lane was not accessed but surveyed from adjacent area (SON07 and Kennylands Road).

Roadside Hedge: Surveyed from the hard surfaced path alongside Kennylands Road. The hedge / tree line includes a variety of mature deciduous trees (e.g. Ash, Oak, Cherry, Field Maple) over an under storey of smaller shrubs and a ground flora of mostly typical wayside plants with some species typical of shady places including a few woodland species. There has been some dumping of soil and turf etc. in the hedge from maintenance work along the adjacent roadside pat.

Overall Value for Wildlife: The main (grassland) part of the site is of relatively low value due to intensity of management. The boundary habitats (green lane, western boundary and eastern hedge) are more valuable and also potentially important woodland link habitats between other nearby sites.

Potential Species Interest: The nature of the grassland sward in the main part of the field is not known. Long periods of intensive grazing and /or other improvements such as herbicide use or re-seeding can and does reduce the variety of species present - but it is possible that pockets of better sward still survive somewhere in the field and though local and sparse that the diversity of plants may be better than appearances would suggest (if it was allowed to flower).

Suggested Management: If opportunity arises allow some, even small areas, of the main grassland to grow longer - to find out what if any variety of herbs and grasses still survive. The demand for grazing in the field may mean only very small areas may be available for this purpose. The Green Lane appears to be a well established feature, supporting a different range of species from the field. The part of the Green Lane that is currently grazed should ideally be excluded from hard grazing.

Suggested Mitigation: Should all or part of the main open pasture be developed retain in its entirety the old Green Lane and an additional strip of land as a buffer zone between the Green Lane and development area. The two other wooded boundaries (roadside hedge and row of Pines) are also potentially important wildlife corridors which should be protected from damage and where possible enhanced (e.g. increased in size). The site has previously been subject to planning applications , but it is not currently known how many houses would be built if planning approval were given and what part / how much of the site will be affected. The area is part of a belt of undeveloped strip of land forming an east west corridor in the south of the village. Its loss or reduction in size could have a significant impact on wildlife even in its current state. If partially developed the improving and protecting any remaining habitats would be desirable.

Area SON 10

Summary Description: Large arable field and its associated margins and hedgerows - only partially surveyed. The field is intensively farmed by annual ploughing with crops sown close if not right up to the field boundaries - leaving room for narrow field margins only. There are intensively managed hedges along the south and east boundaries – which are very low and in places patchy and/or thin - in marked contrast to many of the boundaries elsewhere on the survey sites e.g. the fine old boundary banks in SON 01, SON 02 and SON 03 to the west. The field itself was not surveyed.

Field Margin Adjacent to Sewage Works: Apparently species poor narrow field margin with rough grass, rough herb, bramble and some scrub. This margin may once have included a more formal hedge, which has been damaged by over intensive management.

South West Road Verge and Hedge (South End): More or less typical managed low (flailed) roadside hedge and verge, with typical range of plants, i.e. a mix of bare and disturbed ground and

wayside species. The hedge itself is very patchy and in places absent and/or replaced by bramble. Overall this boundary has a low species diversity.

South East Boundary: Narrow rough species poor field margin north of sewage works with rough grass and rough herb, backing onto adjacent pasture.

It should be noted the hedge defining the northern margin of the sewage works access track includes a greater variety of species of plant with some typical woodland species – outlying populations of the adjacent Bird Wood (not surveyed) immediately to the south. The formal made track to the sewage works may have developed from a simple dirt track at / through the north end of Bird Wood.

Overall Value for Wildlife: This site is a typical intensively managed arable field with narrow field margins and heavily disturbed regularly managed boundary hedges – where they still survive. By comparison with many of the other survey sites in this survey it is less valuable for wildlife.

Potential Species Interest: The intensive nature of the management of the site and nature of the habitats present mean it is less likely to be an important site for most species – but could be of value for specialist species, such as in this case arable weeds. There are many species of plant associated with the regular disturbance of arable fields, potentially among them a number of uncommon or rare species. A full survey of the field would be needed to identify if any such species are present.

Suggested Management: There are no site specific management suggestions.

Suggested Mitigation: See general mitigation guidelines.

Area South East of SON10

Summary Description: Mixed habitat “waste ground” area with rubble piles, short bare areas, rough grass and herbs, bramble and scrub – located to the south of SON 10. The site is bounded to the east by the sewage works and west by Bird Wood. A good variety of birds were recorded. The site supports a few plants not seen elsewhere, including Bee Orchids. The site has not been proposed for development but it has been included in this report and briefly surveyed while in the area as it would be affected if the adjacent SON 10 was developed – even if only by an increase in public access and its associated disturbance.

Overall Value for Wildlife: The variety of habitats on site and its location sandwiched between two relatively undisturbed habitats to the east and west and its lack of active management mean it is a potentially good wildlife site, much better than current information may suggest.

Potential Species Interest: In part the site is included in this report as there are past (unconfirmed) record for Adder in the adjacent sewage works which if present would also be using this area of “waste ground”. Adders are now very rare in Oxfordshire, possibly on the verge of extinction and if they were to be found to be present in the area it would be a very important site. Even if the records are actually Grass Snakes (recorded in error) the presence of this species is also of note as though still widespread there are concerns about the current and future status of all reptile species.

Suggested Management: The current (default) management regime that could be classified as “benign neglect” is probably the ideal management for this site at present. Natural succession will mean the site will develop a bigger covering of bramble, shrubs and trees and shorter grassland and bare areas will decline. Some work could be needed in the future, but the nature of the site circumstances (an abandoned agricultural field) there is no obvious mechanism for this to be achieved.

Suggested Mitigation: In the event of the development of part or all of the adjacent arable land of SON 10 to the north the group of sites to the south including Bird Wood and this area of unmanaged land would be an important refuge areas in their own right as well as being potentially important link habitat with other sites on this side of the parish.

Sonning Common Sewage Works

Summary Description: Not surveyed and only viewed from the adjacent areas. Mostly short mown grass between the various component parts of the sewage works plant.

Overall Value for Wildlife: The value of the site for wildlife is not known. Given the need to manage the site for its core function i.e. sewage treatment, its current value and any potential value may be limited and/or confined to the margins of the site away from the main areas of working plant.

Potential Species Interest: The site in large part is included in this report for interest only, as there have been past (unconfirmed) record for Adder in the area of the works. If present they will probably also be using the adjacent “waste ground” area to the east. Adders are now very rare in Oxfordshire, possibly on the verge of extinction and if they were present in this area (or anywhere else in Sonning Common) it would be exceptionally important. Adders are a rapidly declining species nationally which are already extinct and threatened with extinction in several counties. (Oxfordshire falls into the latter category with confirmed records for Adders from only one current site though other small populations may still exist.)

Suggested Management: No specific management suggestions are made for the sewage works, except perhaps the provision and subsequent checking of reptile refuges to confirm the status of Adders (probably not present) and other reptiles on site. *It is understood that any measures for this site are not in the remit of Sonning Parish Council.*

Area SON 15

Summary Description: The area was formally divided into two survey areas prior to the actual survey. The two parts of the site are the recreation / sport fields used and maintained by Chiltern Edge School and the mature established road side hedge / tree line habitat along Kidmore Lane.

School Playing Fields (15a): Access was not gained to the field, but surveyed visually from Kidmore Lane to the south. The field consists of regularly short mown grass bounded by low regularly cut formal (garden) hedges. The condition of the grassland is not known, but if all or part it have only been mown and not fertilised or treated with herbicide it could still include at least some areas of unimproved / relatively species rich turf. However, the mowing will have caused the loss of some of the larger species or more sensitive species of plant.

Sunken Lane, Kidmore Lane (15b): Section of sunken lane flanked by old woodland banks. Typical flora including larger trees of Oak, Ash, Field Maple, Hawthorn, Holly, Hazel with woodland ground plants including Sweet Woodruff, Bluebell, Dogs Mercury, Wood Melick and some more common wayside species such as Hogweed.

Overall Value for Wildlife: The current value for wildlife is generally reduced due to the current land use of the grassland habitat, and the circumstances of the wooded habitats (divided / disturbed by a well used road). The road verge woody habitats will support a woodland flora and fauna much of it not identified in this survey. The presence of the road is an obvious issue, even if only that of disturbance for many species. The mature woody / hedgerow habitats along the road verges undoubtedly support many more species than this survey has identified. The actual value of the grassland is not known but it is much affected by its current management.

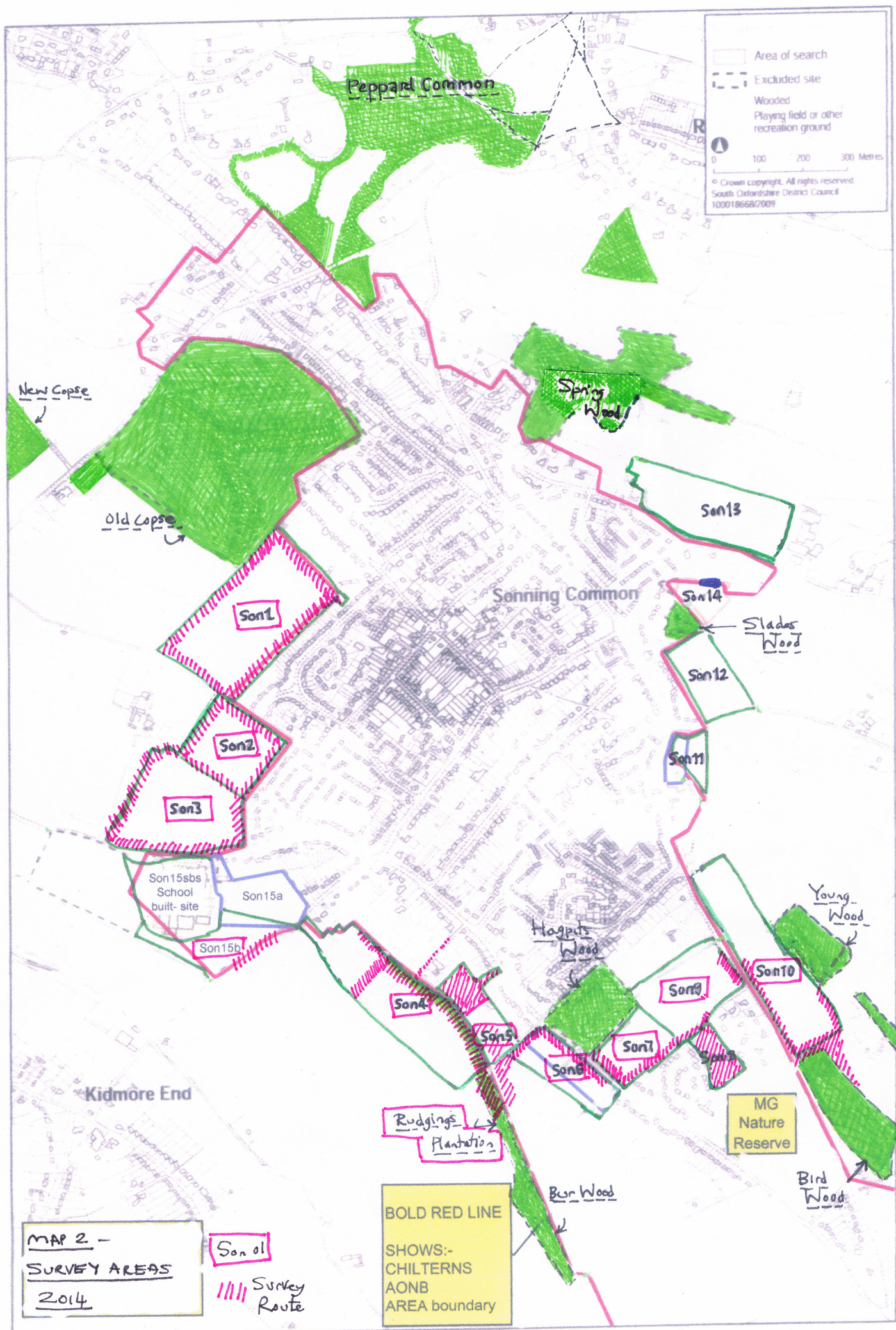
Potential Species Interest: The playing fields are very large and from the outside apparently the whole area is mown short on a regular basis. However playing pitches do not cover the whole of the mown area and it could be possible to leave some areas un-mown and/or mow others on a less frequent basis to create a variety of sward heights – much improving the value of the grassland habitats.

Suggested Management: There is probably limited scope to alter the management of the road side habitats given the obvious constraints due to the presence of the road. However if there was sufficient space the wooded hedge habitat could be allowed to expand into one or both of the grassland habitats either side of the road. (This expansion should not be allowed if any surviving herb rich or otherwise valuable open habitats are lost or damaged.) There is however a lot of scope to create / allow the natural development of better grassland habitats within the school grounds either as defined blocks and/or linear strips (narrow where space is limited) along boundaries or between pitches. It will first be necessary to define the core areas required for both formal and informal recreation, and thus the areas that will continue to need to be mown short on a regular basis. The remaining areas could be surveyed and depending on their location, size and actual or potential value alternative management regimes could be adopted. Suggested grassland management options include cutting only once a year or perhaps every other year, a regime similar to a hay management regime

but without grazing. Another regime would be selective intermittent cutting at appropriate times of year with cutting height adjusted as required to avoid damaging some plants but control others – and encourage shorter sward species. The diversity of other animal life (especially small mammals and invertebrates) would increase accordingly.

Suggested Mitigation: In the absence of any specific plans for the site, only general guidance is provided (see above).

Appendix 2 - Sonning Common Survey Areas Map 2014



Response 16

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

Your comments

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

Response received via email from Barton Willmore on behalf of L&Q Estates.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 2022-10-19 Barton Willmore.pdf - [REDACTED]

Your details and future contact preferences

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

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24778/A3/CS/MK/slh

19th October, 2022

Dear Sir/Madam

SONNING COMMON NEIGHBOURHOOD PLAN REVISION: FURTHER ROUND OF CONSULTATION REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES (SON26: KENNYLANDS ROAD)

We write on behalf of our client, L&Q Estates, in response to the further round of public consultation on the Sonning Common Neighbourhood Development Plan ('SCNDP') Revision.

L&Q Estates acknowledge the targeted nature of the further round of consultation following the Examiners Clarification Note on 22nd April 2022 and follow up Examiners Note on 16th August 2022. As such, our response focuses on the procedural approach taken for the inclusion of the Little Sparrows site (SON24).

As we have set out in our representations to preceding consultations on the Residents Survey in March 2020, Pre-Submission Draft in December 2021, and in response to the Submission Version in March 2022 (attached), the process for preparing the SCNDP Revision is flawed. We have stated previously that the preparation on the SCNDP Revision has failed to meet the basic conditions requiring it to have regard to national policies and guidance.

The material provided in support of this consultation appears to reinforce our case presented in previous representations, which are now demonstrated through an inconsistency in the approach taken in how our client's site has been assessed which is in stark contrast with the proposed allocation of the Little Sparrows site at this late stage of the process.

In this regard, there are two points we wish to raise:

Process and Assessment of Reasonable Alternatives

First, in the Parish Council's response to the Examiner's clarification questions in April 2022, it was made explicitly clear that the SON24 was deemed to be unsuitable for development and that the working party was proceeding on the basis SON24 would not be allocated.

It is unclear how the Parish have concluded and justified the change of position regarding SON24. More importantly, however, the inclusion of SON24 at this stage conflicts with the Parish Council's 'Final Responses to Examiner Questions' (please refer to Answer to Q2). In relation to our client's proposal for SON26, the Parish Council stated that a reassessment of sites did not and could not have taken place after the early stages of the SCNDP Revision had been completed in 2019. Yet, through the Examination, an additional site is proposed to be allocated; a site which the Parish Council had previously rejected.

In our view, there is clear and unreasonable distinction in the process followed to assess our client's proposal within SON26, compared with SON24 now proposed for allocation. We maintain that process is flawed.

To address this failure, we maintain that reconsideration of our client's proposals for a smaller-scale development within SON26 should be properly assessed as part of preparing the SCNDP Revision.

Meeting Housing Need

Second, the submission version of the SCNDP Revision stated that "*the permission given to the Little Sparrows retirement village should not influence the conclusions reached about Sonning Common's true housing need*".

The Examiner sought clarification regarding this comment in the April 2022 Clarification Note. In response, the Parish stated that it reflected their concerns that the retirement village exclusively intended for over 65's would not address the "genuine housing need" based on interactions with residents during the preparation of the plan.

Through this consultation, the proposed modifications delete reference to the development of SON24 not addressing the villages 'true housing need'. As modified, the SCNDP Revision now states that SON24 would contribute to the housing requirement for Sonning Common and, overall, would exceed the requirements for Sonning Common set out in the adopted Local Plan.

We are not aware that any justification or new evidence has been provided as part of this further round of consultation to support this material shift in approach. In the absence of such evidence or justification, we object to this modification and request that the proposed modifications to page 27 of the SCNDP Revision be rejected.

We trust that the above response and our previous representations are of assistance to the Examiner in concluding their report.

Yours faithfully



Senior Planner
Enc.

cc.  - L&Q Estates

APPENDIX 1

Sonning Common Parish Council,
Parish Office,
Village Hall, Wood Lane,
Sonning Common,
READING.
RG4 9SL

SUBMITTED VIA EMAIL ONLY:
planning.policy@southandvale.gov.uk

24478/A3/MK/dw

17th March, 2022

Dear Sir/Madam,

**SONNING COMMON NEIGHBOURHOOD DEVELOPMENT PLAN REVISION: SUBMISSION
VERSION (JANUARY 2022)
REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES (SON26: KENNYLANDS
ROAD)**

We write on behalf of our client, L&Q Estates, in response to the submission (Regulation 16) Sonning Common Neighbourhood Development Plan (SCNDP) Revision which is the subject of public consultation. L&Q Estates control the SON26 site which was identified as one of the reasonable alternative sites for housing but is not proposed for allocation in the SCNDP Revision.

SON26 immediately adjoins the SON6 allocation in the adopted SCNDP which is located at the north-eastern boundary of SON26. In February 2021, L&Q Estates secured outline planning permission (P19/S4350/O) for up to 26 dwellings on SON6. Shanly Homes has since applied for the approval of reserved matters which were approved in December 2021. It is anticipated that this development will commence later in 2022.

Summary

As explained below, the process for preparing the SCNDP Revision is flawed, as the assessment of reasonable alternative sites has not included the proposal which has consistently been promoted by L&Q Estates through the preparation of the SCNDP Revision (please refer to **Appendix A**). Therefore, the subsequent policy choices have not been substantiated by robust or appropriate evidence. It therefore fails to meet the basic conditions requiring it to have regard to national policies and advice which, inter alia, requires neighbourhood plans which allocate sites to have assessed reasonable alternatives.

This failure is particularly concerning as the exclusion of this proposal fails to take account of the support expressed by residents, as summarised in the Residents' Survey consultation report (April 2020), for a more modest scale of development being allocated to the rear of SON6.

Furthermore, and relating to the procedural failure summarised above, the Consultation Statement published as part of this consultation fails to meet the statutory requirements. The Consultation Statement (page 14) includes a summary of 'Landowner/Agent Feedback' received at Regulation 14 stage. This includes the representations submitted by Barton Willmore for L&Q Estates. Disappointingly, the summary fails to capture the procedural flaw which we identified in our Regulation 14 response and as set out in more detail below, albeit we acknowledge that this could satisfy the requirement of Regulation 14(2)(c). However, the Consultation Statement fails to comply with Regulation 15(2) of the Neighbourhood Planning (General) Regulations 2012 (as amended) which requires a description of how issues and concerns – namely, the aforementioned procedural flaw which we have consistently raised with the SCNDP Working Group - have been considered and, where relevant, addressed.

These representations are accompanied by a legal opinion from Killian Garvey of Kings Chambers which comment on the procedural matters summarised above (see **Appendix B**).

In conclusion, we consider the SCNDP Revision fails to meet basic conditions and taking account of the procedural nature of our main objections, should not proceed to examination. If the SCNDP Revision proceeds to an examination, in the interests of fairness, we consider it vital that a hearing is held so that L&Q Estates has an opportunity to present evidence orally to the examiner.

Housing and Policy RH1

The Northern Part of SON26: Land rear of Kennylands Road

A proposed masterplan for the development of a small proportion of the SON26 site, located immediately adjacent to the SON6, is promoted for allocation in the SCNDP Revision (see **Appendix A**). This area has capacity for approximately 25 dwellings and seeks to replicate the ribbon development developed on SON6, with a single row of dwellings alongside further tree planting. This form of development is set back from Rudgings Plantation allowing for supplementary planting, pedestrian links to the Public Right of Way (PRoW), ecological enhancement and sustainable drainage.

Our response to the previous SCNDP Residents' Survey consultation in March 2020 made clear that a more sympathetic approach to development, as illustrated in the enclosed masterplan (**Appendix A**), could retain the appearance of a modest infill and would not significantly protrude beyond a line created by the existing rear residential boundaries of properties fronting Kennylands Road - a qualitative test that the Inspector to the 2018 appeal referred to that set the SON6 allocation apart from that appeal scheme (paragraph 35 of the appeal decision). A copy of our previously submitted representations are enclosed at **Appendix C**.

Such an approach to development would avoid the 'significant depth' that the Inspector referred to (paragraph 35); it would not have views to it from Kennylands Road and would have greatly reduced views of development when compared to the appeal scheme. It would represent only a modest addition to the allocated SON6 site.

As a result, there would only be minimal additional visual impact over and above site SON6 when viewed from the public footpath, little to no visual impact from Kennylands Road, and minimal additional impact on the setting of the AONB over and above that of site SON6, owing to the greatly increased separation between the development edge and the AONB boundary when compared to the appeal scheme, and indeed when compared to the SON5 which has now been developed up to the AONB boundary.

This approach to SON26 promoted by L&Q Estates would not be separate from the settlement, it would remain a linear strip of infill to Kennylands Road. Development would be set back and facing Kennylands Road (within SON6) and housing would also face westwards towards the AONB (but with a landscape buffer strip to its immediate west, adopting the same approach as the SON6 concept plan). This approach would also have minimal impact beyond that of SON6 to the rural and tranquil nature of the site, it would simply make more efficient and effective use of the linear strip of infill.

Our previous response (to the Residents' Survey consultation) also included a critical review of SCPC's 'traffic light summary' which scores potential housing allocation sites. In summary, we identified a range of flaws or ambiguities in the methodology used, and inconsistencies and a lack of justification for some of the scoring (please refer to **Appendix C**). Importantly, it is clear that the assessment of SON26 contained in traffic light summary is based upon the whole of SON26 being developed for housing; an approach which L&Q Estates has been clear it is not promoting.

Therefore, it is clear from the references in the SCNDP Revision to the previous appeal on part of SON26, that the proposal promoted by L&Q Estates (**Appendix A**) has not been assessed by SCPC.

The modest amount of development proposed would not result in any of the impact identified by SCPC for excluding SON26:

- *Impacts on open views from, and the rural setting of, the public footpath which crosses the site;*
- *Location within the AONB setting and the potential harm to its special qualities;*
- *The site's separation from the settlement and its importance as part of the rural setting of the village and its strong relationship with the wider countryside;*
- *Development of even a small part of this site would result in the loss of the pattern of narrow, linear settlement south-west of Kennylands Road; and*
- *The strongly rural and tranquil nature of the site.*

Furthermore, following the Residents' Survey consultation, SCPC published a survey report (dated April 2020) summarising the results of the consultation. The report reveals that 46% of the respondents thought that SON26 is suitable for residential development, the second highest score of all the sites consulted upon. The schedule of comments received provided at Appendix A of that report show that there is *support for*:

- *1/3 of SON26 would be OK;*
- *small development;*
- *partial development at northern end; and*
- *boundary of development set back from Ancient Woodland.*

The feedback from the local community has therefore demonstrated a high level of support for the proposed development for SON26, particularly in the form promoted by L&Q Estates. However, this support appears to have been disregarded in the preparation of the SCNDP Revision.

It is also material that the SON5 allocation, located approximately 50m to the north-west of SON26, has been developed and, alongside SON6, forms part of the baseline against which proposals must now be assessed. This does not appear to have been the case in SCPC's appraisal of SON26.

In conclusion, we seek the allocation of the northern part of SON26, located to the rear of SON6, for approximately 25 dwellings. The extent of the development proposed by L&Q Estates for allocation is shown in **Appendix A**. The allocation of this site has received the support of the local community, is supported by evidence when properly assessed (as opposed to the development of SON26 in its entirety) and would meet all of the relevant basic conditions.

SON23: Johnson Matthey Car Park

It is understood that Site SON23 is currently in use as the Johnson Matthey car park. The site is previously developed and therefore scores better in the SCNDP Site Assessment process than SON26 for example, despite being located within the AONB boundary whereas SON26 is not. This replicates the approach taken by SCPC in preparing the now adopted SCNDP, where the SON2/3 site located in the AONB was allocated for residential development despite objections made by the Chilterns AONB Conservation Board.

The NPPF (2021) advises that "great weight" should be given to conserving and enhancing the AONB which has the highest status of protection, and that the scale and extent of development within the AONB should be limited (paragraph 176). The NPPF goes on to state that (paragraph 177):

"When considering applications for development within National Parks, the Boards and Areas of Outstanding Natural Beauty, [planning] permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest."

Footnote 60 to paragraph 177 advises that whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting. Whilst there is no publicly available concept plan for this site, it is estimated that it could accommodate approximately 20 dwellings which could constitute major development.

There does not appear to be an assessment as part of the SCNDP Review to justify the allocation of SON23 in line with the requirements of paragraph 177. Similarly, it is not clearly explained why an AONB site is selected as a preferred allocation over a site outside of the AONB (SON26) in line with the requirements of the Framework.

We therefore conclude that the proposed allocation of SON23 fails to meet the basic condition to have regard to national policy.

SON15a: Chiltern Edge Top Field

Site SON15a is allocated in the adopted SCNDP for 37 dwellings. Despite this, SON15a has not been brought forward for development in the five years it has been allocated, nor is there any indication of the site being delivered in the short-medium term for 50 dwellings as proposed through the SCNDP Revision.

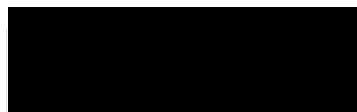
The development of a higher density of development on this site could result in a greater adverse impact on the AONB which is located immediately to the south of the Maiden Erlegh Chiltern Edge School. There is no evidence available to demonstrate that this has been assessed and supports the proposed increased allocation at SON15a.

In the absence of such evidence, we do not consider that this proposal meets the basic conditions to have had regard to national policy or to contribute towards the achievement of sustainable development.

We trust that the above response is of assistance to SODC in assessing the next steps whether to allow further progress of the SCNDP Revision.

Should you have any queries, please do not hesitate to contact the writer on 0118 943 0000 or by email - michael.knott@bartonwillmore.co.uk. Please kindly acknowledge receipt of these representations.

Yours faithfully,



Partner

Enc.

cc.  - L&Q Estates

APPENDIX A



DESIGN RATIONALE

The proposed concept is illustrated below, with a number of specific principles as annotated. Site SON6 establishes a ribbon form of development to Kennylands Road, which exposes its new gardens to the west, enclosed by a 10 metre tree buffer. The proposed solution 'wraps' this ribbon development with a single row of development alongside further tree planting, and a pedestrian connection to the public footpath. This proposal has minimal impact on the AONB, a reduced impact when compared to SON5, and has a number of positive landscape, visual and ecological features.

In summary, the development concept proposed for site SON26 delivers a number of benefits for the community of Sonning Common, these include:

1. The provision of circa 25 dwellings that 'wrap' the ribbon development established by housing site SON6, accessed directly from Kennylands Road with no greater visibility of development from Kennylands Road than is the case with site SON6 delivered.
2. The delivery of additional native tree buffer planting (10-15m depth) to the west of the proposed housing to provide additional landscape screening.
3. The creation of a green corridor linking Rudgings Plantation to Kennylands Road, including meadow and native tree planting to establish a positive biodiversity corridor.
4. The provision of a new footpath link, connecting Kennylands Road to the public footpath (350/14/10) that delivers more direct access to the wider countryside for existing and future residents of Sonning Common.

LEGEND

- Site Boundary
- Reserve Sites
- ① Vehicular access point
- ② Proposed green corridor with native tree planting
- ③ Retained landscape buffer as part of SON6 permission
- ④ Native landscape buffer planting to provide additional screening
- ⑤ Informal public footpath link to the PRoW 350/14/10

SON26 - DESIGN CONCEPT

APPENDIX B

SONNING COMMON NEIGHBOURHOOD PLAN

SUBMISSION ON BEHALF OF L&Q ESTATES

1. Introduction

- 1.1 L&Q have promoted Site SON26 through the emerging Sonning Common Neighbourhood Plan ('the SCNP') for approximately 25 dwellings ('Site SON26'). However, to date, Sonning Common Parish Council ('the Parish Council'), who are preparing the SCNP, have elected not to allocate the Site.
- 1.2 The SCNP is currently at the Regulation 16¹ consultation stage. This submission considers the lawfulness of the procedure underpinning the preparation of the SCNP. For the reasons below, it is submitted that the legal requirements in respect to the SCNP have not been satisfied.
- 1.3 There are essentially four principal errors with the SCNP:
- i. the Parish Council have not properly considered SON26 (**'Issue 1'**);

¹ Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

- ii. the consultation statement does not address the errors in respect to SON26 (**Issue 2**);
- iii. the consultation statement does not address the comments made by L&Q and South Oxfordshire District Council ('the Council') pertaining to the allocation of site SON23 (**Issue 3**);
- iv. the comments made by L&Q and Sport England pertaining to the allocation of Site SON15 have not been addressed (**Issue 4**).

1.4 **Issue 1:** L&Q have consistently been promoting Site SON26 for approximately 25 dwellings. However, the Parish Council have not considered this Site. Rather, the Parish Council have considered a much larger parcel of land, which was never promoted, which includes Site SON26. Further, in the consideration of Site SON26 the Parish Council appear to have made numerous errors in their traffic light assessment of the Site. This contradicts paragraph 098 of the Planning Practice Guidance ('PPG').

1.5 **Issue 2:** L&Q highlighted the above error in their representations previously. However, the Revision Consultation Statement (December 2021) does not address this – contrary to Regulation 15(d) of the Neighbourhood Planning (General) Regulations 2012.

1.6 **Issue 3:** Both the Council and L&Q have raised the concern that site SON23, land rear of Kennylands Road, should not be allocated as a reserve site for 20 dwellings. The site falls within the Chilterns AONB. No proper justification

has been provided justifying this allocation in the AONB. Furthermore, the Revision Consultation Statement does not address the consultee's concerns in this respect.

- 1.7 **Issue 4:** Both L&Q and Sport England have highlighted concerns with the expanded allocation of Site SON15 (Chiltern Edge Top) for 50 units. This would involve the loss of a playing field, contrary to paragraph 99 of the NPPF. Neither the consultation statement or otherwise properly grapples with this issue.

2. **Law and Guidance**

- 2.1 Paragraph 8(1) of Schedule 4B of the Town and Country Planning Act 1990 says that an examination inspector must consider, amongst other things, 'whether the draft neighbourhood development order meets the basic conditions'.

- 2.2 The basic conditions are prescribed by paragraph 8(2) of Schedule 4B TCPA 1990. They include:

(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

...

(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

- 2.3 The guidance that is relevant to paragraph 8(2)(b) in these circumstances is the following paragraph within the PPG (with **emphasis**):

How should a neighbourhood plan allocate sites for development?

*Where a neighbourhood planning body intends to allocate sites for development, **it will need to carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.***

Guidance on general principles for assessing sites and on viability can provide the framework for the assessment of sites. The neighbourhood planning toolkit on site assessments may also be used. A strategic environmental assessment may be required if the plan is likely to have a significant effect on the environment. A neighbourhood planning body is strongly encouraged to consider the environmental implications of its proposals at an early stage, and to seek the advice of the local planning authority.

The site being allocated should be shown on the policies map with a clear site boundary drawn on an Ordnance Survey base map. A policy in the plan will need to set out the proposed land uses on the site, an indication of the quantum of development appropriate for the site and any appropriate design principles that the community wishes to establish.

2.4 Regulation 15(1)(b) of the Neighbourhood Planning (General) Regulations 2012 stipulates that the Parish Council are required to submit a ‘consultation statement’ to the Council alongside the SCNP.

2.5 Regulation 15(2) of the 2012 Regulations defines a ‘consultation statement’ as a document which (with my emphasis):

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

(b) explains how they were consulted;

(c) summarises the main issues and concerns raised by the persons consulted; and

(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

3. Issue 1: the Parish Council have not properly considered SON26

3.1 The PPG (at paragraph 098) states that the Parish Council were required to ‘carry out an appraisal of options and an assessment of individual sites against clearly identified criteria’. Necessarily, it is implicit that the assessment is factually robust and accurate as to what sites were being promoted.

- 3.2 The SCNP Update (November 2019) remarked that Site SON26 was 6.7 hectares. However, this reflected a much larger area of land than being promoted by L&Q. L&Q highlighted this point to the Parish Council through their appointed representatives, Barton Willmore ('BW'), in a letter dated 23 March 2020. In that letter it was highlighted that the area was in fact as follows:

It is estimated that this alternative and much reduced scheme for SON26 would require a land area of approximately 0.75-1 hectares, and deliver 20-25 dwellings, in addition to the existing SON6 allocation.

- 3.3 Further, the Parish Council applied a traffic light scoring of each of the 11 sites that were under consideration. There were numerous errors in this assessment in respect to Site SON26.

- 3.4 The assessment considered whether, '*the Site is particularly sensitive from a landscape (AONB) standpoint? (Any AONB = Amber; importance/iconic = Red)*'. Site SON26 scored amber. However, Site SON26 was one of only three sites amongst the 11 being assessed that did not fall within the AONB. There was no accounting for the fact that the Site was not within the AONB through the amber scoring.

- 3.5 The Site was scored as a red for the question, '*Does the site contain or adjoin any heritage/local value assets?*' However, the Site does not contain or adjoin any heritage or non-designated heritage assets. Thus, it is unclear what the red score was intended to reflect.

3.6 The Site was scored as red for the question, *‘Would development remove publicly accessible open space, green infrastructure, recreation facilities or a public right of way?’* The Site is currently inaccessible, save for a public right of way which runs through it. There was no suggestion to remove this public right of way through L&Q’s promotion of the Site. Any other access to the Site by a member of the public would constitute trespass. Thus, again it unclear what the red score was intended to reflect and what publicly accessible areas would be ‘lost’.

3.7 L&Q similarly highlighted the above to the Paris Council. No amendments were made to the assessment.

3.8 From the above it would appear that the assessment was deeply flawed in its consideration of what the available sites and options were – contrary to paragraph 098 of the PPG.

4. **Issue 2: *the consultation statement does not address the error in respect to SON26***

4.1 Regulation 15(2) of the 2012 Regulations requires that the consultation statement summarises the main issues and concerns raised by the persons consulted and describes how those issues and concerns have been considered and addressed.

- 4.2 Through Barton Willmore, L&Q raised all of the issues highlighted under Issue 1 to the Parish Council (in the letter dated 23 March 2020). Notwithstanding that this was all highlighted to the Parish Council, the consultation statement simply records the following as Barton Willmore's consultation response:

Barton Willmore (on behalf of L&Q Estates) with reference to SON 26 (Rudgings Plantation) – referred to the previous allocation of SON 6 for up to 26 homes in a linear development along Kennylands Road. Barton Willmore (BW) stated that it wished to see the land behind the existing allocated SON 6 for a further 25 dwellings (approx.) and asserted that the comments made in the Residents' Surveys on the larger SON 26 (which was submitted for consideration) supported this allocation. BW further argued that the allocation of SON 23 (Johnson Matthey car park) as a reserve site for housing was not justified because the NPPF condition for development in the AONB 'other than in exceptional circumstances' had not been met. Commenting on the uplift from 37 to 50 on SON 15 (Chiltern edge Top) BW said there was no indication of it being delivered in the 'short-medium term' and that it could result in a 'greater adverse effect on the AONB.'

- 4.3 Thus, the consultation statement did not record that L&Q had cited errors in the traffic light scoring system or that the site they were promoting was considerably smaller than the site the Parish Council assessed. Thus, Regulation 15(2)(c) was not complied with. Further, and more critically, the consultation statement made no attempt at all to describe how these issues and concerns have been addressed.

4.4 To meet the basic conditions under paragraph 8(2)(g), Schedule 4B of the Town and Country Planning Act 1990, the SCNP is required to comply with any prescribed conditions and prescribed matters. This necessarily includes the requirements of the consultation statement within Regulation 15(2)(c) and (d) of the 2012 Regulations. This has not occurred and thus the legal requirements in respect to the SCNP have not been satisfied.

5. **Issue 3: *the consultation statement does not address the comments made by L&Q and South Oxfordshire District Council ('the Council') pertaining to the allocation of sites SON23***

5.1 The consultation statement records the Council's concerns about the SCNP as follows:

South Oxfordshire District Council – provided a detailed commentary on the proposals, suggesting numerous changes and some additions and deletions with a view to bring the revision into alignment with LP2035 and the NPPF. Overall, the recommendations were extremely helpful and almost all were adopted as can be seen in the chapter covering policy changes. Of particular value was the advice to include the allocation of SON 1 (Old Copse Field) as a designated Local Green Space. There were no outstanding issues of disagreement apart from the recommendation that the allocation of SON 23 (Johnson Matthey car park) as a reserve site for housing should be deleted which was not accepted by the working party.

5.2 The Council recommended that Site SON23 (within the AONB) should be deleted. However, the consultation statement does not describe how this concern has been addressed, save for saying it ‘was not accepted’. Thus, Regulation 15(2)(d) is not complied with.

5.3 Similarly, in the Barton Willmore letter dated 23 March 2020, L&Q expressed their concern with Site SON23 as follows:

No assessment has been undertaken as part of the SCNDP Review to justify the allocation of the site in line with the requirements of paragraph 172. Similarly, it is not clearly explained why an AONB site is selected as a preferred allocation over a site outside of the AONB (SON26) in line with the requirements of the Framework.

5.4 Whilst this concern was recorded within the consultation statement, no attempt was made to describe how it was considered and addressed. Thus, again Regulation 15(2) was not satisfied.

6. **Issue 4: the comments made by L&Q and Sport England pertaining to the allocation of Site SON15 have not been addressed**

6.1 The consultation statement records Sport England’s concerns as follows:

Sport England – commented on the allocation of SON 15 (Chiltern Edge Top) for 50 homes (as opposed to 37 in the 2016 NDP) saying that it

would object to a planning application if a suitable mitigation plan for the loss of playing fields were not presented by MECE.

- 6.2 L&Q addressed Site SON15 in the Barton Willmore letter dated 23 March 2020, saying as follows:

Whilst site SON15a has been assessed previously for 37 dwellings as part of the made SCNDP process, an assessment has not been undertaken for a 50-dwelling scheme as part of the current review. It is unclear whether the additional 13 dwellings will form part of the same site area as SON15a in the existing SCNDP or whether a larger area is proposed. SON15a should therefore have been subject to the same assessment process before a conclusion was reached that it should form part of the new SCNDP Strategy.

- 6.3 The consultation statement did record these concerns, however, it made no attempt to discuss how these concerns by either party had been considered or addressed.

- 6.4 Further, Sport England have addressed the point that the allocation could involve the loss of playing fields. The consultation statement does not address this. Moreover, no justification is provided for the loss of playing fields, contrary to paragraph 99 of the NPPF, which says:

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

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

6.5 Thus, again the basic conditions have not been met insofar as the SCNP has not had regard for national policies and advice contained in guidance issued by the SoS (per paragraph 8(2)(a) of Schedule 4B TCPA1990).

7. Conclusion

7.1 For all these reasons, therefore, L&Q submit that the basic conditions within paragraph 8, Schedule 4B of the TCPA 1990 have not been met in respect the SCNP.

[REDACTED]

16 March 2022



APPENDIX C

Neighbourhood Development Plan Review,
Sonning Common Parish Council,
Parish Office,
Wood Lane,
SONNING COMMON.
RG4 9SL

24478/A3/KJ/dw

BY EMAIL & POST: ndp@sonningcommonparishcouncil.org.uk

23rd March, 2020

Dear Sir/Madam,

SONNING COMMON NEIGHBOURHOOD DEVELOPMENT PLAN REVIEW: RESIDENTS' SURVEY REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES

We are pleased to submit the following representations on behalf of L&Q Estates in response to the Sonning Common Neighbourhood Development Plan (SCNDP) Review Residents' Survey (hereafter referred to as 'the Survey') which ends on Monday 23rd March, 2020. L&Q Estates control land at Kennylands Road, Sonning Common. The total extent of land within L&Q Estates' control is shown edged red on the enclosed location plan at **Appendix A**, which amounts to approximately 10.3ha (hereafter referred to as 'the Site'). The Site is one of 11 that have been assessed as part of the SCNDP Review (site reference SON26).

The land immediately adjacent to SON26 and abutting Kennylands Road is allocated for 26 dwellings in the made SCNDP (Site SON6, Policy HS4). L&Q Estates has submitted an outline planning application to South Oxfordshire District Council (SODC) for the development of this site for 26 dwellings in accordance with the SON6 allocation. The planning application is expected to be determined by SODC in the near future.

The representations below comment on the SCNDP Site Assessment process (the 'traffic light' scoring system), the assessment of SON26, and on the SCNDP Strategy.

SCNDP Site Assessment Process

The SCNDP Review has assessed 11 sites using a 'traffic light' scoring system against a set of criteria to ascertain their potential for accommodating residential development. The requirement for Sonning Common in the Submission Draft of the South Oxfordshire Local Plan 2034 is 108 dwellings, in addition to the allocations in the 'made' SCNDP. From the scoring system, the SCNDP Review concludes that only one site (SON23) is suitable to be considered further for potential development.

The 'traffic light' scoring system as part of the SCNDP Review assesses sites as 'Red', 'Amber' and 'Green', where it is understood that 'Red' represents a negative score, 'Amber' is neutral and 'Green' is positive. Given the wording of the criteria against which sites are assessed, L&Q Estates' view is that it is not appropriate for the traffic light scores alone to lead to a conclusion as to whether a site should be considered further or discounted from the process. For example:

- Questions 1-8: there is no explanation of what was assessed as part of each 'Survey Part' under questions 1-8 (other than titles such as 'Sustainability Public Transport' which indicate broad topics) or the methodology used, and therefore no evidence of how the 'Red' 'Amber' or 'Green' conclusions have been drawn.
- Question E: Whether a site is 'Greenfield' is an important consideration, but if a site has not been previously developed, this does not necessarily mean the site should be marked red and considered for exclusion. A more important consideration which is not asked in the survey, is whether the site is located within the AONB or not. In accordance with the requirements of the NPPF, sites located outside of the AONB should be considered for development in preference to those within, before consideration is given as to Greenfield status.
- Question H: there is no definition of a local value asset. Whether or not a site adjoins or contains a heritage or local value asset is an important consideration but is not a factor that should preclude development. The question should look at the significance of the asset and the extent to which development may harm that asset, or whether any harm could be mitigated. The 'Red' and 'Amber' conclusions to this question are therefore misleading. The results are also inconsistent as demonstrated in the response to QH: SON26 is scored red for Q10 whereas Site SON27 which is immediately adjacent to SON26, the AONB, and Rudgings Plantation scores a green.
- Questions AJ and AK: when considering potential sites for housing, questions that ask whether sites offer 'scope for development of community facilities or schools' are not appropriate. There are many sites that cannot offer this scope directly, owing to their location and size for example, but this does not directly translate to being unsuitable for development. It is also unclear why the word 'particular' is highlighted bold for these questions.

SON26: Rudgings Plantation

The extent of Site SON26 reflects the whole of the Site controlled by L&Q Estates, minus the SON6 allocation. The SCNDP Review has assessed and excluded SON26, stating that '*Development is restricted to 26 homes within SON6, already included in existing NP*'. Whilst this is true, SON6 does not form part of SON26 therefore it should not be a reason why SON26 is excluded. The Review goes on to explain that SON26 is discounted based on the following:

- *Impacts on open views from, and the rural setting of, the public footpath which crosses the site;*
- *Location within the AONB setting and the potential harm to its special qualities;*
- *The site's separation from the settlement and its importance as part of the rural setting of the village and its strong relationship with the wider countryside;*
- *Development of even a small part of this site would result in the loss of the pattern of narrow, linear settlement south-west of Kennylands Road; and*
- *The strongly rural and tranquil nature of the site.*

These conclusions appear to assume that the approach to accommodating development within the SON26 site will be similar to that of a previous scheme promoted for this land for 95 dwellings, which was dismissed on appeal in 2018 (reference APP/Q3115/W/17/3183391). Indeed, the plan of SON26 in the SCNDP Review is significantly larger than the 95 dwelling scheme as it continues beyond the public footpath to the south. The rejection of SON26 as a future location for housing therefore seems to have been significantly influenced by the outcome of the 2018 appeal decision and the much larger site area included in SON26.

The SCNDP Assessment does not consider that site SON26 has the potential to deliver a more modest quantum and extent of development. The extent of development required by this more modest approach could retain the appearance of a modest infill and would not significantly protrude beyond a line created by the existing rear residential boundaries of properties fronting Kennylands Road - a qualitative test that the Inspector to the 2018 appeal referred to that set the SON6 allocation apart from that appeal scheme (paragraph 35 of the appeal decision). This approach would avoid the 'significant depth' that the Inspector referred to (paragraph 35), and would not have views to it from Kennylands Road and would have greatly reduced views of development when compared to the appeal scheme (with only a minor addition to the allocated SON6 site).

As a result, there would only be minimal additional visual impact over and above site SON6 when viewed from the public footpath, little to no visual impact from Kennylands Road, and minimal additional impact on the setting of the AONB over and above that of site SON6, owing to the greatly increased separation between the development edge and the AONB boundary when compared to the appeal scheme, and indeed when compared to made SCNDP allocation SON5).

This approach to SON26 promoted by L&Q Estates would not be separate from the settlement, it would remain a linear strip of infill to Kennylands Road. Development would be set back and facing Kennylands Road (within SON6) and housing would also face westwards towards the AONB (but with a landscape buffer strip to its immediate west, adopting the same approach as the SON6 concept plan). This approach would also have minimal impact beyond that of SON6 to the rural and tranquil nature of the site, it would simply make more efficient and effective use of the linear strip of infill.

It is estimated that this alternative and much reduced scheme for SON26 would require a land area of approximately 0.75-1 hectares, and deliver 20-25 dwellings, in addition to the existing SON6 allocation. Adopting SCPC's approach, we have undertaken the traffic light assessment for the alternative scheme to SON26 as described above (**Appendix B**).

The SCNDP Review Strategy

Based on the findings of the SCNDP Site Assessment process, SCPC's Strategy for meeting the 108 homes requirement through the SCNDP Review is presented as part of the Survey as follows:

- New housing allocation on the Johnson Matthey Car Park Site (SON23);
- Increasing in housing on SON15a (Maiden Erlegh Chiltern Edge) from 37 to 50;
- Extra Care apartments; and
- Infill Development.

We address each element of the Strategy in turn below.

SON23: Johnson Matthey Car Park

It is understood that Site SON23 is currently in use as the Johnson Matthey car park. The site is previously developed and therefore scores better in the SCNDP Site Assessment process than SON26 for example, despite being located within the AONB boundary whereas SON26 is not. The NPPF (February 2019) advises that “great weight” should be given to conserving and enhancing the AONB which has the highest status of protection, and that the scale and extent of development within the AONB should be limited (paragraph 172). The NPPF goes on to state that (paragraph 172):

‘Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.’

Footnote 55 to paragraph 172 advises that whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting. The SCNDP Site Assessment concludes that the 0.7ha site has medium capacity for housing. Whilst there is no publicly available concept plan for this site, it is estimated that it could accommodate approximately 20 dwellings which would ordinarily constitute major development.

No assessment has been undertaken as part of the SCNDP Review to justify the allocation of the site in line with the requirements of paragraph 172. Similarly, it is not clearly explained why an AONB site is selected as a preferred allocation over a site outside of the AONB (SON26) in line with the requirements of the Framework.

SON15a: Chiltern Edge Top Field

Site SON15a is allocated in the made SCNDP for 37 dwellings. The SCNDP states *that ‘Chiltern Edge School has received formal government approval for the sale of the land known as SON15a...development of SON 15a is intended to provide funds to enable the school to achieve urgently needed improvements to its infrastructure and facilities thereby ensuring its future viability.’* (page 82). Despite this, SON15a has not been brought forward for development for the 37 dwellings allocated, nor is there any indication of the site being delivered in the short-medium term for 50 dwellings as proposed through the SCNDP Strategy.

Whilst site SON15a has been assessed previously for 37 dwellings as part of the made SCNDP process, an assessment has not been undertaken for a 50-dwelling scheme as part of the current review. It is unclear whether the additional 13 dwellings will form part of the same site area as SON15a in the existing SCNDP or whether a larger area is proposed. SON15a should therefore have been subject to the same assessment process before a conclusion was reached that it should form part of the new SCNDP Strategy.

Extra Care Apartments

The SCNDP Strategy does not advise where extra care apartments should be accommodated in Sonning Common, nor is there any indication of a likely scale of development or a possible site assessment, or evidence of a deliverable scheme that could be relied upon as part of the SCNDP Review Strategy.

It is understood that SCPC is considering the use of 'reserve' site SON8 in the made SCNDP for a development of 40 extra care units at Bird Wood Court, which would be an uplift of 26 dwellings from the SON8 allocation for 14 homes (Kennylands Gymnastics site). However, there is no evidence of a planning application having been submitted on this site, nor are development proposals put forward as part of the Review process to support its deliverability.

As part of the SCNDP Review, the SON8 site should be assessed again on the basis that it is now being considered for an extra care scheme to form part of the strategy for meeting Sonning Common's housing need. The previous assessment of the site (as part of the made SCNDP) which concluded its suitability for 14 dwellings cannot be relied upon to determine whether a 40-unit care home is acceptable in the same location.

Infill Development

The SCNDP Strategy relies upon infill development to meet the residual requirement for housing. Asides from SON23 (if developed for 20 dwellings comprises 18% of the 108 homes requirement) and SON15a (if developed for 13 homes makes up 12% of the requirement); the possible extra care provision and windfall sites (both of which are suggested options with no evidence to support their likely delivery) comprise 70% of the overall requirement. The Strategy does not provide an indication of sites that may be considered for infill development within Sonning Common, nor a likely quantum of development that might contribute towards the 108 homes requirement.

The latest windfall data published by SODC in its Housing Land Supply Statement (April 2019) suggests that of the 8 windfall sites granted planning permission in Sonning Common between 2014 and 2019 (6 of which have full planning permission) no completions have been recorded across these sites as of 1st March 2019. The total number of dwellings collectively across these windfall sites is 28. SCPC is understood to be working on an assumption of 10 dwellings per annum being delivered through windfall sites in Sonning Common however there is no evidence to support this rate of delivery.

L&Q Estates consider that the SCNDP Review strategy places too great a reliance upon infill or windfall development to meet Sonning Common's housing need. It is not sufficient for the SCNDP to rely on an uncertain number of infill or windfall that may come forward given the uncertainty surrounding the Extra Care element of the Strategy and the limited housing that could come forward as part of SON23 (c.20 dwellings) and SON15a (13 dwellings).

Summary

L&Q Estates raise concern above with the deliverability of both proposed site allocations in the SCNDP Strategy (SON23 and SON15a) and have identified flaws in their assessment and selection process. If delivered, both sites would make a very small contribution (c.33 dwellings) to meeting the 108 homes requirement for Sonning Common.

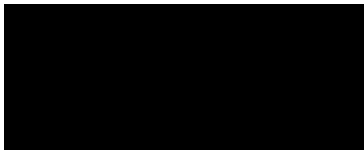
L&Q Estates also raise concern with the SCNDP Strategy relying upon two uncertain elements to meet the residual housing requirement (75 dwellings): namely extra care apartments and infill/windfall sites, the latter of which should make up only a very small proportion of the total housing supply for the village.

Conversely, the SCNDP Site Selection process has excluded the only non-AONB site of the 11 considered, namely SON26, without proper consideration of its merits or potential to accommodate development. Site SON26 is situated immediately adjacent to an existing allocation (SON6, which has been assessed through the made SCNDP as an appropriate location for development) and as explained above, has not been robustly assessed through the SCNDP Review given the assumptions taken from the larger 'appeal scheme'.

Site SON26 could accommodate a more modest development than envisaged through the SCNDP Review that has minimal visual impact visually and on the setting of the AONB. The extent of development at SON26 would be broadly in line with the extent of SON5 to the north and would assimilate with the development of SON6 immediately to the east. The proposed allocation of a more modest site at SON26 would therefore strengthen the SCNDP Strategy in providing a deliverable and sustainable site to meet the needs of Sonning Common. The Strategy as currently drafted is not robust and cannot be realistically relied upon.

We trust that this representation is helpful as you continue to undertake the SCNDP Review. On behalf of L&Q Estates, we look forward to the opportunity to discuss the Site with the Parish Council in more detail. Please contact the writer on 0118 943 0000 should you have any questions or require any additional information.

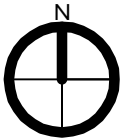
Yours faithfully,


Planning Associate

Encs.

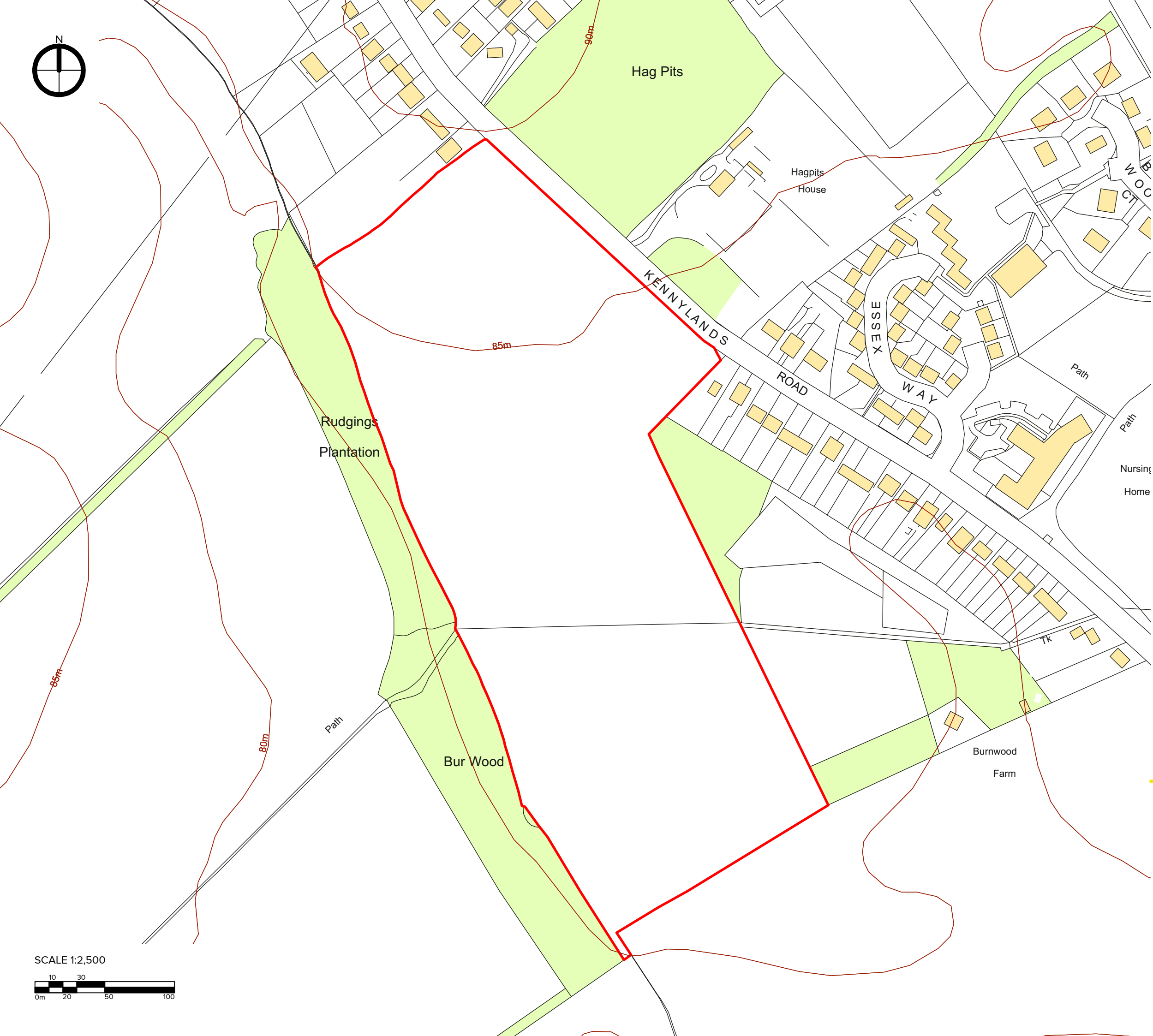
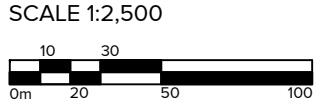
cc.  - L&Q Estates (w/encs.)
- SODC (w/encs.)

APPENDIX A



LEGEND

Site Boundary (10.3 Ha)



Rev	Description	Date
		Rev
	DE195_005	Drg No
	Gallagher Estates	Client
	Sonning Common	Project
	Red Line Plan	Title
	1:2500 @A3	Scale

APPENDIX B

SONNING COMMON NEIGHBOURHOOD PLAN – SITE RANKING CRITERIA SITE EVALUATION FOR SON26

Ref	Site Ranking Criteria	SCPC Assessment of SON26	L&Q Estates Comments (based on 'reduced' SON26 development as described in representations to SCNDP Review Residents' Survey)
1	Survey Part 1 – Descriptive Only		
2	Survey Part 2A – Sustainability Views and Setting		Unable to comment against each of these criteria without understanding the content/questions asked as part of each Survey.
3	Survey Part 2B – Sustainability Green Space and Wildlife		
4	Survey Part 2C – Sustainability Neighbouring Character and Uses		
5	Survey Part 2D – Sustainability Walking and Cycling		
6	Survey Part 2E – Sustainability Public Transport		
7	Survey Part 3A		
8	Survey Part 3B		
A	Is the site available for development within 1-5 years?		Agreed. Site is available within 1-5 years.
B	Is the site available for development within 1-10 years?		Agreed. Site is available within 1-10 years.
C	Is the site available for development within 15 years?		Agreed. Site is available within 15 years.
D	Is the site highly sensitive environmentally or ecologically?	?	Surveys have not identified any highly sensitive environmental or ecological features. Score should therefore be green.
E	Is the site a 'greenfield' site? (if not what % has previously been developed?)		Yes; the site is greenfield and has not been previously developed. This should not be a factor that precludes development and marking this red is misleading. A more important factor is whether the site is within the AONB. SON26 is the only site of the 11 assessed that is non-AONB. Development of a reduced SON26 area would not extend as far as the AONB boundary and sufficient planting would be provided to the rear of the development, still allowing for a significant amount of open space between the edge of the site and the Ancient woodland buffer.
F	Are there tree preservation orders?		No TPOs on the site therefore agree with green scoring.
G	Is the site of archaeological interest?		Agree with SCPC review; the site is not of archaeological interest.
H	Does the site contain or adjoin any heritage/local value assets?		The site does not contain or adjoin heritage assets. It is unclear what local value assets are referred to. The red scoring is misleading and inconsistent when compared with the scoring for adjacent site SON27 for QH (see full representation).
I	Is the land graded 3a, or above for agriculture?		Subject to an agricultural grading assessment for the site.
J	Does the site have any infrastructure deficiencies? (including access especially to deep sites)		Agree with SCPC review; the site does not have any infrastructure deficiencies.
K	Is the site particularly sensitive from a landscape (AONB) standpoint?		The 'reduced' SON26 allocation does not meet the edge of the AONB boundary and could incorporate a landscape buffer to the rear in the same fashion as SON6, providing a sensitive transition to the open space to the west and to mitigate any visual impact from the development. Moreover a gap would exist between the landscape buffer and the existing ancient woodland.
L	Is the site free from flood risk? (including significant drainage problems)		Yes, agree with SCPC conclusion.
M	Is the site readily accessible to the highway network?		Yes, agree with SCPC conclusion.
N	Are community healthcare facilities reasonably accessible?		Yes, agree with SCPC conclusion.
O	Is a bus stop reasonably accessible?		Yes, agree with SCPC conclusion.
P	Are shops reasonably accessible? (incl. by bus)		Yes, agree with SCPC conclusion.
Q	Are community facilities reasonably accessible? (incl. by bus)		Yes, agree with SCPC conclusion.
R	Are local schools reasonably accessible?		Yes, agree with SCPC conclusion.

SONNING COMMON NEIGHBOURHOOD PLAN – SITE RANKING CRITERIA SITE EVALUATION FOR SON26

S	Will the local traffic impact be acceptable? (incl. traffic access and overspill parking)		Yes, it is anticipated that the impact on traffic arising from the reduced SON26 site would be acceptable and a policy compliant level of parking would be provided
T	On how many sides does the site adjoin existing housing or development?		The reduced SON6 development area would adjoin the SON6 development along the eastern edge, and residential development to the north and south, but would not extend as far west as the existing woodland.
U	Are there natural or other obvious boundaries to the site?		Yes, as above.
V	Could this site take a mixed development of houses?		Yes, the site can accommodate a mix of dwellings.
AA	Would development of the site risk a significant trend toward merging with another settlement outside Sonning Common?		No. The 'reduced' SON26 site would represent a modest development when compared with the existing SON6 allocation and would broadly mirror the extent of SON5 to the north. A development of this scale would not risk Sonning Common merging with another settlement; moreover, the development would be contiguous with the existing settlement edge.
AB	Could development of this site/part site be appropriate in scale and character with the existing settlement, including consideration of adjacent density?		Yes. The development of the reduced SON26 site would be of a similar scale to the existing SON6 allocation and would remain a linear strip of infill to Kennylands Road. Development would be set back and facing Kennylands Road (within SON6) and housing would also face westwards towards the AONB (but with a landscape buffer strip to its immediate west, adopting the same approach as the SON6 concept plan). This approach would also have minimal impact beyond that of SON6, it would simply make more efficient and effect use of the linear strip of infill.
AC	Is development compatible with existing or proposed neighbouring uses?		Yes, the reduced SON26 site adjoins SON6 which is allocated for residential development, adjacent to which is existing residential development on Kennylands Road. The new SON26 site has scope to incorporate a landscape buffer to the rear in the same fashion as SON6, providing a sensitive transition to the open space to the west.
AD	Would the development support the vitality and viability of the (village) centre?		Yes, the development is sustainably located to provide residents with access to the village centre to make use of the facilities it offers. In addition, the development would generate CIL which may be contributed towards improving local services and facilities.
AE	Would development remove publicly accessible open space, green infrastructure, recreation facilities or a public right of way?		No. The site is greenfield however the land is private and therefore the development of a reduced SON26 site would not result in the loss of publicly accessible open space. The existing public right of way would not be affected and would remain in use.
AF	Landscape Setting: looking from outside (taking account of topography and woodland/hedging) would development have significant adverse impact on surrounding area?		<p>No. The reduced SON26 site could retain the appearance of a modest infill and would not significantly protrude beyond a line created by the existing rear residential boundaries of properties fronting Kennylands Road - a qualitative test that the Inspector to the 2018 appeal referred to that set the SON6 allocation apart from that appeal scheme (paragraph 35 of the appeal decision). This approach would avoid the 'significant depth' that the Inspector referred to in paragraph 35, and would not have views to it from Kennylands Road and would have greatly reduced views of development when compared to the appeal scheme (with only a minor addition to the allocated SON6 site).</p> <p>There would only be minimal additional visual impact over and above site SON6 when viewed from the public footpath, little to no visual impact from Kennylands Road, and minimal additional impact on the setting of the AONB over and above that of site SON6, owing to the greatly increased separation between the development edge and the AONB boundary when compared to the appeal scheme, and indeed when compared to made SCNDP allocation SON5).</p>

SONNING COMMON NEIGHBOURHOOD PLAN – SITE RANKING CRITERIA SITE EVALUATION FOR SON26

AG	Does site offer particular scope for provision of straightforward Amenity Greenspace (grassed, informal recreation – no formal pitches)?		Yes, the site could accommodate amenity greenspace within the development.
AH	Does site offer scope for development of any appropriate B1 office space?		No. It is not considered that this site is best suited for B1 office space. The site is appropriate for residential development given that it adjoins an existing infill allocation for housing. L&Q Estates question the relevance of this question in a survey that evaluates sites for residential development to meet Sonning Common's housing need.
AJ	Does site offer particular scope for development of Community/Sports Hall/Changing rooms – with parking and playing fields?		No. The site itself is not suitable for this purpose. As above, L&Q Estates question the relevance of this question in a survey that evaluates sites for residential development to meet Sonning Common's housing need. However, the development of the site would enable the opportunity to secure financial contributions through a S106 Agreement, some of which may go towards provision of community and sports facilities.
AK	Does site offer particular scope for development of schools, shops or healthcare etc facilities?		No. The site itself is not suitable for this purpose. As above, L&Q Estates question the relevance of this question in a survey that evaluates sites for residential development to meet Sonning Common's housing need. However, the development of the site would enable the opportunity to secure financial contributions through a S106 Agreement, some of which may go towards infrastructure provision such as schools and healthcare facilities.

Sonning Common Parish Council,
Parish Office,
Village Hall, Wood Lane,
Sonning Common,
READING.
RG4 9SL

24478/A3/MK/dw

SUBMITTED VIA EMAIL ONLY:
ndp@sonningcommonparishcouncil.gov.uk

1st December, 2021

Dear Sir/Madam,

**SONNING COMMON NEIGHBOURHOOD DEVELOPMENT PLAN REVISION: PRE-SUBMISSION
VERSION (DRAFT) (OCTOBER 2021)
REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES (SON26: KENNYLANDS
ROAD)**

We write on behalf of our client, L&Q Estates, in response to the pre-submission draft (Regulation 14) Sonning Common Neighbourhood Development Plan (SCNDP) Revision which is the subject of public consultation. L&Q Estates control the SON26 site which identified as one of the reasonable alternative sites for housing but is not proposed for allocation in the SCNDP Revision.

SON26 immediately adjoins the SON6 allocation in the adopted SCNDP which is located at the north-eastern boundary of SON26. In February 2021, L&Q Estates secured outline planning permission (P19/S4350/O) for up to 26 dwellings on SON6 and a housebuilder, Shanly Homes, has applied for the approval of reserved matters which, at the time of writing, is awaiting determination. Subject to approval, it is anticipated that this development will be built out within the next two years.

Housing and Policy RH1

The Northern Part of SON26: Land rear of Kennylands Road

A proposed masterplan for the development of a small proportion of the SON26 site, located immediately adjacent to the SON6, is promoted for allocation in the SCNDP Revision (see **Appendix A**). This area has capacity for approximately 25 dwellings and seeks to replicate the ribbon development developed on SON6, with a single row of dwellings alongside further tree planting. This form of development is set back from Rudgings Plantation allowing for supplementary planting, pedestrian links to the Public Right of Way (PRoW), ecological enhancement and sustainable drainage.

Our response to the previous SCNDP Residents' Survey consultation in March 2020 made clear that a more sympathetic approach to development, as illustrated in the enclosed masterplan (**Appendix A**), could retain the appearance of a modest infill and would not significantly protrude beyond a line created by the existing rear residential boundaries of properties fronting Kennylands Road - a qualitative test that the Inspector to the 2018 appeal referred to that set the SON6 allocation apart from that appeal scheme (paragraph 35 of the appeal decision).

Such an approach to development would avoid the 'significant depth' that the Inspector referred to (paragraph 35); it would not have views to it from Kennylands Road and would have greatly reduced views of development when compared to the appeal scheme. It would represent only a modest addition to the allocated SON6 site.

As a result, there would only be minimal additional visual impact over and above site SON6 when viewed from the public footpath, little to no visual impact from Kennylands Road, and minimal additional impact on the setting of the AONB over and above that of site SON6, owing to the greatly increased separation between the development edge and the AONB boundary when compared to the appeal scheme, and indeed when compared to the SON5 which has now been developed up to the AONB boundary.

This approach to SON26 promoted by L&Q Estates would not be separate from the settlement, it would remain a linear strip of infill to Kennylands Road. Development would be set back and facing Kennylands Road (within SON6) and housing would also face westwards towards the AONB (but with a landscape buffer strip to its immediate west, adopting the same approach as the SON6 concept plan). This approach would also have minimal impact beyond that of SON6 to the rural and tranquil nature of the site, it would simply make more efficient and effective use of the linear strip of infill.

Our previous response (to the Residents' Survey consultation) also included a critical review of SCPC's 'traffic light summary' which scores potential housing allocation sites. In summary, we identified a range of flaws or ambiguities in the methodology used, and inconsistencies and a lack of justification for some of the scoring. Importantly, it is clear that the assessment of SON26 contained in traffic light summary is based upon the whole of SON26 being developed for housing; an approach which L&Q Estates has been clear it is not promoting.

Therefore, it is clear from the references in the SCNDP Revision to the previous appeal on part of SON26, that the proposal now promoted by L&Q Estates (**Appendix A**) has not been assessed by SCPC.

The modest amount of development proposed would not result in any of the impact identified by SCPC for excluding SON26:

- *Impacts on open views from, and the rural setting of, the public footpath which crosses the site;*
- *Location within the AONB setting and the potential harm to its special qualities;*
- *The site's separation from the settlement and its importance as part of the rural setting of the village and its strong relationship with the wider countryside;*
- *Development of even a small part of this site would result in the loss of the pattern of narrow, linear settlement south-west of Kennylands Road; and*
- *The strongly rural and tranquil nature of the site.*

Furthermore, following the Residents' Survey consultation, SCPC published a survey report (dated April 2020) summarising the results of the consultation. The report reveals that 46% of the respondents thought that SON26 is suitable for residential development, the second highest score of all the sites consulted upon. The schedule of comments received provided at Appendix A of the report show that there is *support for:*

- *1/3 of SON26 would be OK;*
- *small development;*
- *partial development at northern end; and*

- *boundary of development set back from Ancient Woodland.*

The feedback from the local community has therefore demonstrated a high level of support for the proposed development for SON26, particularly in the form now promoted by L&Q Estates (**Appendix A**). However, this support appears to have been disregarded in the preparation of the SCNDP Revision.

It is also material that the SON5 allocation, located approximately 50m to the north-west of SON26, has been developed and, alongside SON6, forms part of the baseline against which proposals must now be assessed. This does not appear to have been the case in SCPC's appraisal of SON26.

In conclusion, we seek the allocation of the northern part of SON26, located to the rear of SON6, for approximately 25 dwellings. The extent of the site proposed for allocation is shown in **Appendix A**. The allocation of this site has received the support of the local community, is supported by evidence when properly assessed (as opposed to the development of SON26 in its entirety), and would meet all of the relevant basic conditions.

SON23: Johnson Matthey Car Park

It is understood that Site SON23 is currently in use as the Johnson Matthey car park. The site is previously developed and therefore scores better in the SCNDP Site Assessment process than SON26 for example, despite being located within the AONB boundary whereas SON26 is not. This replicates the approach taken by SCPC in preparing the now adopted SCNDP, where the SON2/3 site located in the AONB was allocated for residential development despite objections made by the Chilterns AONB Conservation Board.

The NPPF (2021) advises that "great weight" should be given to conserving and enhancing the AONB which has the highest status of protection, and that the scale and extent of development within the AONB should be limited (paragraph 176). The NPPF goes on to state that (paragraph 177):

"When considering applications for development within National Parks, the Boards and Areas of Outstanding Natural Beauty, [planning] permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest."

Footnote 60 to paragraph 177 advises that whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting. Whilst there is no publicly available concept plan for this site, it is estimated that it could accommodate approximately 20 dwellings which would ordinarily constitute major development.

There does not appear to be an assessment as part of the SCNDP Review to justify the allocation of SON23 in line with the requirements of paragraph 177. Similarly, it is not clearly explained why an AONB site is selected as a preferred allocation over a site outside of the AONB (SON26) in line with the requirements of the Framework.

We therefore conclude that the proposed allocation of SON23 fails to meet the basic condition to have regard to national policy.

SON15a: Chiltern Edge Top Field

Site SON15a is allocated in the adopted SCNDP for 37 dwellings. Despite this, SON15a has not been brought forward for development in the five years it has been allocated, nor is there any indication of the site being delivered in the short-medium term for 50 dwellings as proposed through the SCNDP Revision.

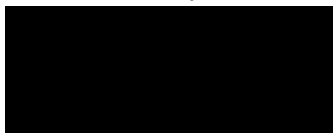
The development of a higher density of development on this site could result in a greater adverse impact on the AONB which is located immediately to the south of the Maiden Erlegh Chiltern Edge School. There is no evidence available to demonstrate that this has been assessed and supports the proposed increased allocation at SON15a.

In the absence of such evidence, we do not consider that this proposal meets the basic conditions to have had regard to national policy or to contribute towards the achievement of sustainable development.

We trust that the above response is of assistance to SCPC in progressing towards the final submission (Regulation 15) SCNDP Revision. We would welcome an opportunity to meet with SCPC to discuss the scheme presented at **Appendix A**.

Should you have any queries, please do not hesitate to contact the writer on 0118 943 0000 or by email - michael.knott@bartonwillmore.co.uk.

Yours faithfully,



Partner

cc.  - L&Q Estates

APPENDIX A










DESIGN RATIONALE

The proposed concept is illustrated below, with a number of specific principles as annotated. Site SON6 establishes a ribbon form of development to Kennylands Road, which exposes its new gardens to the west, enclosed by a 10 metre tree buffer. The proposed solution 'wraps' this ribbon development with a single row of development alongside further tree planting, and a pedestrian connection to the public footpath. This proposal has minimal impact on the AONB, a reduced impact when compared to SON5, and has a number of positive landscape, visual and ecological features.

In summary, the development concept proposed for site SON26 delivers a number of benefits for the community of Sonning Common, these include:

1. The provision of circa 25 dwellings that 'wrap' the ribbon development established by housing site SON6, accessed directly from Kennylands Road with no greater visibility of development from Kennylands Road than is the case with site SON6 delivered.
2. The delivery of additional native tree buffer planting (10-15m depth) to the west of the proposed housing to provide additional landscape screening.
3. The creation of a green corridor linking Rudgings Plantation to Kennylands Road, including meadow and native tree planting to establish a positive biodiversity corridor.
4. The provision of a new footpath link, connecting Kennylands Road to the public footpath (350/14/10) that delivers more direct access to the wider countryside for existing and future residents of Sonning Common.

LEGEND

-  Site Boundary
-  Reserve Sites
-  Vehicular access point
-  Proposed green corridor with native tree planting
-  Retained landscape buffer as part of SON6 permission
-  Native landscape buffer planting to provide additional screening
-  Informal public footpath link to the PRoW 350/14/10

SON26 - DESIGN CONCEPT

Response 17

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 Maiden Erlegh Trust and Deanfield Homes Ltd.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: 2022-10-19 Savills.pdf - [REDACTED]

Your details and future contact preferences

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

Title	-
Name	[REDACTED]
Job title (if relevant)	Associate
Organisation (if relevant)	Savills
Organisation representing (if relevant)	Maiden Erlegh Trust and Deanfield Homes Ltd
Address line 1	Savills, Ground Floor, Hawker House
Address line 2	5-6 Napier Court
Address line 3	Napier Road
Postal town	Reading
Postcode	RG1 8BW
Telephone number	-
Email address	[REDACTED]@savills.com

19 October 2022



Planning Policy Team
South Oxfordshire District Council
135 Eastern Ave
Milton
Abingdon
OX14 4SB

E: [REDACTED]@savills.com
DL: [REDACTED]

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Napier Road
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T: +44 (0) 1189 520 500
F: +44 (0) 1189 520 501
savills.com

Sent by email only to: planning.policy@southandvale.gov.uk

Dear Sir / Madam,

SONNING COMMON NEIGHBOURHOOD DEVELOPMENT PLAN (NDP) REVIEW – RESPONSE TO CONSULTATION ON PROPOSED MODIFICATIONS

On behalf of the Maiden Erlegh Trust ('the Trust') and Deanfield Homes Ltd, we write to respond to the current consultation on proposed modifications to the Sonning Common Neighbourhood Development Plan (NDP) Review Submission Version.

As per our previous representations, Maiden Erlegh Trust and Deanfield Homes Ltd are bringing forward development proposals for 50 dwellings at land at Maiden Erlegh Chiltern Edge (MECE) School, based on the allocation in the made Sonning Common NDP (2016) (site ref. SON15a) and the NDP Review Submission Version (December 2021) (site ref. SON15).

Savills, on behalf of Deanfield Homes Ltd and the Maiden Erlegh Trust, previously submitted representations to the NDP Review Pre-Submission Draft consultation in November 2021 and to the NDP Review Submission Version consultation in March 2022. A note was also submitted in response to the Examiner's Clarification Note (22nd April 2022) in May 2022 to provide clarification regarding the proposed site allocation (ref. SON15).

Proposed Modifications

Table 1 of the Schedule of Modifications sets out 6 proposed changes to the NDP Review Submission Version:

It is noted that all of the proposed modifications relate to and result from the proposed allocation of Little Sparrows (ref. SON24) as a retirement care village (Use Class C2) of up to 133 units. This follows the grant of planning permission at the Little Sparrows site at appeal in June 2021 (refs. P19/S4576/O and 3265861).

For ease of reference our representations on the proposed modifications are set out below, based on Table 1 of the Schedule of Modifications:

- Page 13/14 (addition of new paragraph regarding background to Little Sparrows allocation) – no comments.
- Page 14 (addition of Little Sparrows allocation and previously identified reserve sites in table of site allocations) – the retention within the table of 'SON 15 – Maiden Erlegh Chiltern Edge – The site enlarged to include the original 15b to allow for drainage – allocation increased from 37 to 50' is welcomed.
- Page 14 (deletion of paragraph relating to reserve sites) – no comments.

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

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



- Page 26 Policy RH1 (addition to policy text of Little Sparrows allocation) – the retention within Policy RH1 of ‘An increase from 37 to 50 homes on allocated site SON 15 (Chiltern Edge Top) – with provision for key workers as agreed with the owners’ is welcomed.
- Page 27 (amendments and additions to paragraph) – It is recommended that the proposed additional text which states ‘*The allocation in the revised NDP exceeds the housing requirements set out in the Local Plan*’ is omitted. In line with the national Planning Policy Framework (NPPF) (2021), Policy STRAT2 of the adopted South Oxfordshire Local Plan (2019) is clear that the housing requirements set out are ‘minimums’ and paragraph 4.30 of the Local Plan (2019) states that SODC will support the allocation of further development sites to provide additional housing above the stated housing requirement. It is therefore recommended that the proposed additional text is omitted for clarity and to ensure the NDP Review meets the ‘basic conditions’ (set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990).

This paragraph would then read as follows:

“In the case of Sonning Common this amounted to a total of 377 new homes. The allocations in the 2016 NDP accounted for 195 of that number. As of 1 April 2020 completions and commitments have raised the number of homes built or with planning permission to 281. This has left an outstanding requirement of 96 homes to be considered in the revised NDP and is addressed in Policy RH1. – ~~although the granting of planning permission for the 133 extra care apartments on the Little Sparrows site (SON 24) obviously required a major rethink of the working party’s recommendations, which is reflected in the allocations now contained in the revision. It is the view of the working party that the permission given to Little Sparrows ‘retirement village’ should not influence the conclusions reached about Sonning Common’s true housing need.~~

The allocation in the revised NDP exceeds the housing requirements set out in the Local Plan.”

- Page 46 (addition of new paragraph and modification of sub-title) – no comments.

Land at MECE School

No modifications are proposed to the revised allocation at Chiltern Edge Top (site reference: SON15) for 50 homes. This is welcomed given the current progress of development proposals at the site.

As referred to above, land at Maiden Erlegh Chiltern Edge (MECE) School (referred to as Chiltern Edge Top (site reference: SON15a)) is allocated in the made Sonning Common NDP (2016) under Policy H2 for residential development of 37 homes. The site was specifically allocated in the made NDP (2016) in order to ‘provide funds to enable the school to achieve urgently needed improvements to its infrastructure and facilities thereby ensuring its future viability’ (page 82, NDP (2016)). Following detailed and positive engagement with the NDP Working Group, the NDP Review Submission Version (December 2021) now includes a revised allocation at Chiltern Edge Top (site reference: SON15), including additional land, for 50 homes together with drainage, landscaping and open space.

Further to the allocation within the made NDP and draft NDP Review, Deanfield Homes Ltd was appointed by the Maiden Erlegh Trust to bring forward development proposals at the site. Deanfield Homes is committed and contractually obliged to deliver new homes at site SON15.

A full planning application for 50 homes at land at MECE School, on site ref. SON15, was recently submitted to South Oxfordshire District Council (SODC) in June 2022 (ref. P22/S2180/FUL). A separate full planning application for proposed sports mitigation measures associated with the proposed residential development was submitted to SODC in July 2022 (ref. P22/S2586/FUL). Whilst the two applications are separate, both the Trust and Deanfield Homes Ltd fully appreciate and are supportive of the applications being formally linked through a s106 and/or conditions, as both are intrinsically inter-linked to enable the delivery of a comprehensive strategy

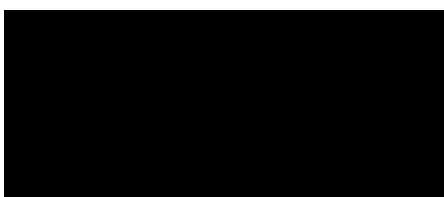


for the future of the school and enable all policy requirements to be addressed. Both planning applications are currently being determined and are expected to be considered favourably within the next few months.

On the basis of the above, we confirm that site SON15 is available and deliverable, in line with the draft NDP Review allocation, within the Plan period.

We trust that the above comments are helpful and will be considered in the examination of the NDP Review. However please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours faithfully



Associate

Response 18

Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

Your comments

Q2. You can provide your comments on the Sonning Common Neighbourhood Plan Review 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 Thames Water.

Please see attachments.

Q3. You can upload supporting evidence here.

- File: 22.10 Sonning Common NP issued.pdf - [REDACTED]
- File: 22.10 Sonning Common Sites Table.xlsx - [REDACTED]

Your details and future contact preferences

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Title	-
Name	██████████
Job title (if relevant)	Property Town Planner
Organisation (if relevant)	Thames Water
Organisation representing (if relevant)	-
Address line 1	1st Floor West Clearwater Court
Address line 2	Vastern Road
Address line 3	-
Postal town	Reading
Postcode	RG1 8DB
Telephone number	-
Email address	██████████@thameswater.co.uk



E: [REDACTED]@thamewater.co.uk
M: [REDACTED]

South & Vale Council

Issued via email:
planning.policy@southandvale.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

14 October 2022

South & Vale – Sonning Common Neighbourhood Plan

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the South and Vale area and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

Site Allocations

The attached table provides Thames Water’s site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link:
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

General Water and Wastewater Infrastructure Comments

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”*

Paragraph 11 states: *“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Sonning Common is served by Sonning Common Sewage Treatment Works situated to the South East of Sonning.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a

policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Comments in Relation to Flood Risk and Sustainable Drainage Systems

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

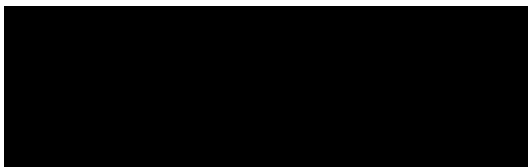
Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,





Thames Water Property Town Planner

Site ID	Site Name	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water	Water Response	Waste Response
68168	Little Sparrows, Blount Court Road, Reading RG4 9PA	89535.6	1.04	84	46550	1.62	133	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
37858	SON 2 Bishopswood Middle Field	53460	0.62	50	17500	0.61	50	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
68884	SON 23 (Johnson Matthey car park)	21384	0.25	20	7000	0.24	20	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .

37861	SON 5 Kennylands Paddock	26730	0.31	25	8750	0.3	25	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
12839	SON 6 Kennylands Infill	27799.2	0.32	26	9100	0.32	26	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
37869	SON15 Chiltern Edge Secondary School, Reade's Lane, Sonning Common, RG4 9LN (Pending)	53460	0.62	50	17500	0.61	50	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ