

Sonning Common Neighbourhood Plan - publicity period

Response 1

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Contact Details	
Name	Mr Payne
Email	[REDACTED]

Q1. Are you completing this form as an:
Agent

Your comments

<p>Q2. You can provide your comments on the Sonning Common Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Site 1 on Maps 1.3, 2.1 and 4.1 is shown as 'Local Green Space'. The owner, Investfront Ltd, through his agent has continually and categorically made the point that the use of the land as an agricultural field is the current and anticipated future use. There are no plans to open up public access to the field either now or in the future. On behalf of the owner, I would request in the strongest possible terms that this designation is removed and not re-instated. The owner has never promoted the land for this use and can only assume that there is an element of malintent involved. This can only be rectified by removing the designation completely from the NP. Please could you confirm that this has been carried out.</p>

Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Sonning Common Neighbourhood Plan:</p>
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	Mr
Name	Neil Davis
Job title (if relevant)	-
Organisation (if relevant)	Davis Planning Ltd
Organisation representing (if relevant)	Davis Planning Ltd
Address line 1	19 Woodlands Avenue
Address line 2	Winnersh
Address line 3	-
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Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified

Q9. How did you find out about the Sonning Common Neighbourhood Plan consultation?

Word of mouth

Response 2

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Individual

Your comments

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I believe it's very important as a democratic country to take into consideration the opinions of those of us that live in Sonning Common. I completely understand the need for housing and I think that infill building together with the small developments that have been identified in our Nesbit Plan are more than enough to cover the requirements of 100 houses. Based on this, I strongly oppose the Little Sparrow's site in any form and hope that money doesn't win the appeal! The village doesn't have the infrastructure, our amazing Health Centre couldn't provide the high demanding service for that group age (they already do a fantastic job, supporting the elderly in their homes and covering Sue Ryder). Perhaps, one of my concerns is that imposing something like that in the community, can be detrimental for those buying into that development. The road and access is not fit for purpose, there are not enough support or activities for the elderly and our charity FISH is not getting enough funding, but still most of the times, they have come with ideas for trips, activities and a group of volunteers to provide support and befriending- this wouldn't be sustainable. We also need to think of the future generations, when offering housing for young families, developers should contribute to ease the pressure on schooling, donate, build and help maintain safe recreational areas. Parking and transport will need expansion and the Local Authority won't be able to cover everything through Council Tax. It feels to me that developers could play a more active role. Building the houses and selling them is the easy and greedy part; but they should put back into the communities by investing on activities and schemes delivered over at least 5-10 years (similar to what supermarkets do constantly).

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Don't know

Your details and future contact preferences

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Title	Mrs
Name	Ruth Lennon
Job title (if relevant)	Teaching Assistant
Organisation (if relevant)	-
Organisation representing (if relevant)	-

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

[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]

Response 3

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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<p>I just want to reiterate my previous comments on the allocation of SON 15 (Chiltern Edge Top) for 50 homes (as opposed to 37 in the 2016 NDP) saying that Sport England will object to a planning application if a suitable mitigation plan for the loss of playing fields were not presented by MECE.</p> <p>I have been involved in over 2 years of discussions with the School's agents and there has been very little tangible progress. Our intention is that we would make representations to the SoS for the DoE at the Section 77 panel, even if planning permission is granted against our advice, there is insufficient mitigation.</p> <p>I believe that SODC and VoHDC are about to commission a new playing pitch strategy and this could have a bearing on this allocation.</p> <p>I also want to support the development and growth of Memorial Park, which I believe is of significant benefit to the village. And I also support the desire to create an informal recreation space with facilities encouraging healthy activity, sport and opportunities for community engagement and working in cooperation with Maiden Erlegh Chiltern Edge (MECE).</p>

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Title	Mr
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Organisation representing (if relevant)	Sport England
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Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified

Q9. How did you find out about the Sonning Common Neighbourhood Plan consultation?

District Council

Response 4

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

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<p>Please see uploaded PDF Thanks The Chilterns Conservation Board</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: SONNING COMMON NEIGHBOURHOOD PLAN Reg 16 Submission consultation 10th March 2022.pdf - [REDACTED]

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.

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).

Public examination

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Title	Dr
Name	Michael Stubbs
Job title (if relevant)	Planning Adviser
Organisation (if relevant)	The Chilterns Conservation Board
Organisation representing (if relevant)	The Chilterns Conservation Board
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Address line 3	-
Postal town	Oxfordshire
Postcode	OX394HA
Telephone number	01844355500
Email address	planning@chilternsaonb.org

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

Yes I would like to be notified

Q9. How did you find out about the Sonning Common Neighbourhood Plan consultation?

District Council



Contact: Michael Stubbs
Tel: 01844 355507
Fax: 01844 355501
E Mail: planning@chilternsaonb.org
www.chilternsaonb.org

Chairman: Cllr Ian Reay
Vice Chairman: Ray Payne
Chief Executive Officer: Dr Elaine King

10th March 2022

By upload only to SODC Neighbourhood Plans portal.

My Ref.: F:\Planning\Planning Policy\

Sonning Common Neighbourhood Plan – Submission Version Regulation 16 Consultation

1.0 Introduction and Summary.

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.

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.

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.

Pre-Submission Consultation

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 to 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.

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(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](#)).

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

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

Yours sincerely,

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



The Chilterns Area of Outstanding Natural Beauty

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

Chilterns Conservation Board

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

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

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

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

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

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

List of Organisations providing Nominees to the Chilterns AONB Conservation Board

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

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

Response 5

Respondent Details

Information



Q1. Are you completing this form as an:

Agent

Your comments

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Please refer to attachments.

Q3. You can upload supporting evidence here.

- File: 22.03.15 LNDP Review - MECE reps.pdf - [REDACTED]
- File: RGPL399510 - 02C - Red Line Plan.pdf - [REDACTED]

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.

Please refer to attachments.

Public examination

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Your details and future contact preferences

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Title	Mr
Name	Tom Ryan
Job title (if relevant)	-
Organisation (if relevant)	-
Organisation representing (if relevant)	-
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Postal town	Reading
Postcode	RG1 8BW
Telephone number	07870999306
Email address	tom.ryan@savills.com

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

Yes I would like to be notified

Q9. How did you find out about the Sonning Common Neighbourhood Plan consultation?

District Council

15 March 2022

savills

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

Julia Mountford
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Ground Floor, Hawker House
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Napier Road
Reading RG1 8BW
T: +44 (0) 1189 520 500
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savills.com

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

Dear Sir / Madam,

SONNING COMMON NEIGHBOURHOOD DEVELOPMENT PLAN (NDP) REVIEW – RESPONSE TO SUBMISSION VERSION CONSULTATION

On behalf of Deanfield Homes Ltd, we write to respond to the current Sonning Common Neighbourhood Development Plan (NDP) Review Submission Version consultation.

Land at Maiden Erlegh Chiltern Edge (MECE) School is allocated in the made Sonning Common NDP (made 2016) under Policy H2 for residential development of 37 homes (referred to as Chiltern Edge Top (site reference: SON15a)). Deanfield Homes Ltd has recently been appointed by the Maiden Erlegh Trust to bring forward development proposals at the site.

Savills, on behalf of Deanfield Homes Ltd and the Maiden Erlegh Trust, submitted representations to the NDP Review Pre-Submission Draft consultation in November 2021 and a number of minor changes were made to the allocation wording and supporting text in the draft Neighbourhood Plan which are welcomed.

The NDP Review Submission Version includes a revised allocation at Chiltern Edge Top (site reference: SON15) for 50 homes, including additional land (previously referred to as site reference: SON 15b) for drainage (and in particular a Sustainable Urban Drainage System), landscaping and open space. The proposed revised allocation reflects previous positive engagement between the Trust, Deanfield Homes Ltd and the NDP Working Group and these representations are supportive of the NDP Review Submission Version document. Further to our representations to the NDP Review Pre-Submission Draft consultation several minor alternations are proposed to the specific wording of the proposed revised allocation as detailed further below to assist with for clarity and consistency purposes, 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).

For ease of reference these representations are structured below based on the structure of the NDP Review.

NDP Review Part Two: Revising the Neighbourhood Development Plan (page 11)

Site selection and underlying principles (page 13)

The text within the third paragraph on page 13 of the NDP Review provides a clear overall summary of the engagement undertaken in relation to the existing allocation. However, a minor amendment is proposed, as set out below, in order to clarify details regarding the approach by the Trust and the proposed housing mix:

*"An approach was made by the school and its agents Savills to explore the possibility of increasing the number from 37 to 50 while maintaining the basic footprint by building **predominantly** two and three bedroom homes ~~and excluding four and five bedroom homes~~." (proposed revisions in bold underlined and strike-through text).*

NDP Review Part Four: Revision objectives and policies

Settlement boundary (page 22)

Map 4.1 introduces a new settlement boundary outlined in red, which is then referred to within Policy RSB1. The supporting text on page 25 states that the settlement boundary “is drawn to include Maiden Erlegh Chiltern Edge school and SON 15”. However, we note that the settlement boundary only includes SON15a and not SON15b. The NDP Review proposes to extend the existing allocation at SON15a to also include SON15b (together referred to as SON15), with SON15b proposed to accommodate drainage to support built residential development on SON15a.

The key on Map 4.1 states that “Red line is the settlement boundary line to be defined by a local policy (within the NDP area) restricting development of the settlement outside this line to agricultural and countryside uses.” Policy RSB1 then states, “Proposals for development outside the settlement boundary will only be supported if they are appropriate to a countryside location and are consistent with development plan policies...”

Whilst the proposed use of SON15b comprises drainage, with associated landscaping and open space, and not built development (and this is accepted by Deanfield), given that SON15b will now form part of the wider SON15, it is recommended that the settlement boundary is drawn to include the entirety of the SON15 allocation. As set out below, it is noted that the NDP Review does not include a plan clearly identifying the site allocation of SON15. A copy of the revised site boundary is enclosed for reference.

Housing (page 26)

Policy RH1 confirms the proposed revised allocation of SON15 (Chiltern Edge Top) for 50 homes, which reflects our previous engagement with the NDP Working Group and is supported. It is noted that Policy RH1 has been amended, further to our previous representations, to clarify the desire for the development to include provision for key workers as part of the overall allocation.

The NDP Review Submission Version includes a new policy, Policy RH5, relating to affordable housing tenure requirements. The proposed new requirement to provide 25% First Homes of the affordable housing contribution reflects guidance set out within national Planning Practice Guidance (PPG) and South Oxfordshire District Council’s (SODC) First Homes Guidance Note (October 2021). It is noted from the above guidance that First Homes should be sold at a maximum of £250,000, after applying the required minimum 30% discount and this will therefore be reflected in the proposals.

NDP Review Part Five: Revision site allocations (pages 43-50)

Pages 44-46 provide a summary of the allocated sites in the made NDP (2016) since the NDP was made. The full revised allocation for “SON15 (Chiltern Edge Top)” is set out on pages 49-50.

It is noted and welcomed that the full revised allocation has been amended, following our previous representations, to refer to “a 2.5 hectare site (to include 2.1 ha for built development and 0.4ha for drainage incorporated into the landscaping/amenity area.”

In addition, for consistency purposes a site plan showing the revised site allocation should be inserted on page 48 of the NDP Review. As above, a copy of the revised site boundary (ref. RGPL399510 02C) is enclosed for reference.

Summary

Deanfield Homes Ltd support the revised allocation at Chiltern Edge Top (SON15) for 50 homes set out in the NDP Review Submission Version, which reflects previous discussions with the Parish Council.

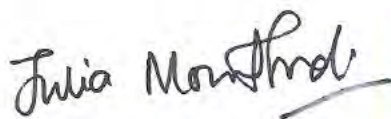
For clarity and to ensure the NDP Review meets the 'basic conditions' (set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990) several minor alterations are proposed to specific wording in the NDP Review Submission Version as summarised below. The proposed revisions above are shown in bold underlined and strike-through text.

- Page 13, third paragraph – revise text to: “An approach was made by the school and its agents Savills to explore the possibility of increasing the number from 37 to 50 while maintaining the basic footprint by building **predominantly** two and three bedroom homes ~~and excluding four and five bedroom homes.~~”
- Map 4.1 – revise settlement boundary to include the full extent of the revised SON15 allocation
- Page 48 – insert plan of revised site allocation.

We trust that the above comments are helpful and will be considered in the examination of the NDP Review.

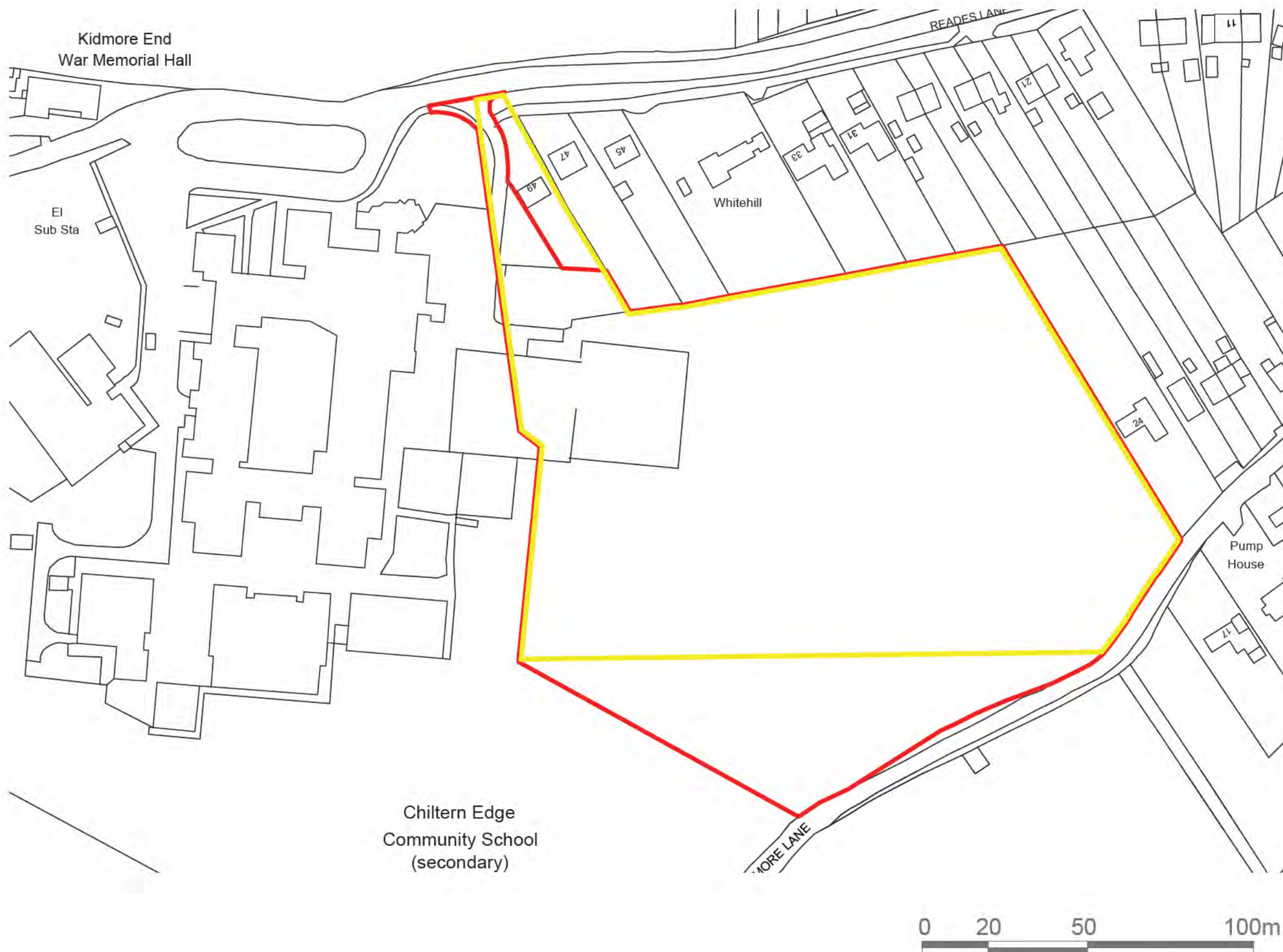
Please do contact me if you have any questions regarding these representations or require any further information.

Yours faithfully



Julia Mountford
Associate Director

Enc. Drawing ref. 02C Land at Maiden Erlegh Chiltern Edge School – Red Line Plan



- Red Line Boundary
- Neighbourhood Plan (NP) Allocation

Notes

1. All built development will be located within the boundary of the NP allocation
2. Outside of this area will be used to accommodate openspace, including the sustainable urban drainage systems

Land at Maiden Erlegh Chiltern Edge School

on behalf of Maiden Erlegh Trust

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\\Oxford03\urban design\URBAN DESIGN\UD Projects\RGPL399510 - Chiltern Edge School\B Drawings\INDO\RGPL399510 - IND001 - Drawing sheets 10/04/19
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drawing no.	02	drawing	Red Line Plan		
revision	C	drawn by	CS	job no.	RGPL399510
scale	1:1250 @ A3	checked by	-	date	10/04/2019



URBAN DESIGN **savills**

Response 6

Respondent Details

Information	
[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 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.
Please see attachment.

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 20220201 Reg 16 Sonning Common.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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Organisation representing (if relevant)	-
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Policy and Programmes

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



Listening Learning Leading

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17 March 2022

**Sonning Common Neighbourhood Development Plan Review – Comments
under Regulation 16 of the Neighbourhood Planning (General) Regulations
2012 (As Amended)**

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

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

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

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

Robyn Tobutt
Senior Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
	All policies	To provide clarity we would recommend that the examiner consider a recommendation for each policy to be presented in its own policy box. At present multiple policies are presented in the same text box, with it not immediately clear how many individual policies there are.
	<p>Page 14</p> <p>'The remainder to be comprised of assisted living / extra care apartments on Kennylands Gymnastics (SON 8), a development of smaller houses on the Johnson Matthey car park (SON 23) and an allowance for continuing infill.</p>	<p>This paragraph should be amended to reflect policy RH1 in the plan. We believe it is telling the story of how the strategy in the Sonning Common Neighbourhood Plan Review has developed, however as worded it is unclear and not consistent with policy RH1. We would recommend the following replacement wording:</p> <p><i>'Kennylands Gymnastics (SON 8) and Johnson Matthey car park (SON 23) have now been identified as reserve allocations in the plan. This is in response to the granting of planning permission for 133 extra care apartments on Little Sparrows (SON 24).'</i></p> <p>We have made detailed comments in relation to SON 8 and SON 24 later on in this response.</p>
	<p>Page 22</p> <p>Map 4.1: Sonning Common settlement boundary</p>	<p>In some places the line thickness of the settlement boundary means it is hard to see exactly where the boundary is. The NPPG is clear that policies in the neighbourhood plans should be drafted with sufficient clarity that a decision maker can apply them consistently and with confidence. In applying Policy RSB1, decision makers may have difficulty in applying the settlement boundary in some areas. For example, this is particularly the case on the eastern edge of the boundary.</p> <p>For clarity we recommend that the quality of the map showing the proposed settlement boundary is improved. If the examiner is minded to propose such modification, the district council can assist with the preparation of clearer maps.</p>

Ref.	Section/Policy	Comment/Recommendation
	Page 23 – Policy RSB2	<p>Policy H1: Delivering New Homes in the Local Plan sets out that:</p> <p>‘3. Residential development on sites not allocated in the Development Plan will only be permitted where:</p> <ul style="list-style-type: none"> i. it is development within the existing built up areas of Towns and Larger Villages as defined in the settlement hierarchy (shown in Appendix 7); provided an important open space of public, environmental, historical or ecological value is not lost, nor an important public view harmed; or’ <p>In addition, Policy CF4: Existing Open Space, Sport and Recreation Facilities in the Local Plan seeks to protect, maintain and where possible enhance existing open spaces. Local Plan Policy ENV1: Landscape and Countryside also looks to protect and, where possible enhance features that contribute to the nature and quality of South Oxfordshire’s landscape, including trees (individual trees, groups of trees and woodlands).</p> <p>Therefore, the areas identified in Policy RSB2 - open green spaces, the Millennium Green and valued woodland, already benefit from a level of protection from these strategic Local Plan policies. Despite this protection, it is important to acknowledge that development in these locations may sometimes be appropriate.</p> <p>As worded this policy is overly restrictive in summarising that these areas will be ‘protected from development’. Policies H1, CF4 and ENV1 are all identified as strategic policies and therefore Policy RSB2 should be in general conformity with these policies. For example, policy CF4 mentioned above sets out how development proposals that result in the loss of such facilities will only be permitted where:</p> <ul style="list-style-type: none"> i. it can be demonstrated that alternative facilities of equal or better quality will be

Ref.	Section/Policy	Comment/Recommendation
		<p>provided in an equally accessible location as part of the development;</p> <p>ii. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss; or</p> <p>iii. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements.</p> <p>To ensure the policy is in general conformity with the strategic policies of the development plan, we recommend the following replacement wording:</p> <p><i>‘In accordance with development plan policies open green spaces, the Millennium Green and valued woodland that lie within the settlement boundary will be protected from inappropriate development.’</i></p>
	<p>Page 24 – Fourth paragraph</p> <p>‘In this regard, the policy takes account of the South Oxfordshire LP2035 Policy H1 Policy H1, and specifically point 3.(iii) in seeking to ensure that development would not extend the built limits of the settlement.’</p>	<p>Within the last sentence ‘Policy H1’ is repeated. We recommend this duplication is removed.</p>
	<p>Page 24 – Sixth paragraph</p> <p>‘NPPF para 177 states that planning permission should be refused for major development within the AONB or within the setting of the AONB...’</p>	<p>We recommend ‘or within the setting of the AONB’ is removed from this text. Paragraph 177 of the NPPF does not refer to the setting of the AONB, therefore it would be inaccurate to say that it does.</p>
	<p>Page 26 – Policy RH1</p>	<p>The South Oxfordshire Local Plan’s strategy for housing distribution in the Larger Villages is for each settlement to grow proportionally by around 15% from the 2011 base date, plus any housing allocated to that village through the Core Strategy. The outstanding requirement to be</p>

Ref.	Section/Policy	Comment/Recommendation																																																												
		<p>delivered through neighbourhood plans took account of commitments and completions as shown in table 4f of the Local Plan:</p> <p><i>Table 4f: Provision of homes at Larger Villages</i></p> <table><tr><th>Larger village</th><th>Core Strategy + 15% growth</th><th>Completions and commitments*</th><th>Outstanding requirement for NDP</th></tr><tr><td colspan="4">Villages without allocations in this Local Plan</td></tr><tr><td>Benson</td><td>383</td><td>831</td><td>0</td></tr><tr><td>Chinnor</td><td>594</td><td>947</td><td>0</td></tr><tr><td>Cholsey</td><td>612</td><td>690</td><td>0</td></tr><tr><td>Crowmarsh Gifford</td><td>312</td><td>571</td><td>0</td></tr><tr><td>Goring-on-Thames</td><td>329</td><td>180</td><td>0</td></tr><tr><td>Sonning Common</td><td>377</td><td>281</td><td>96</td></tr><tr><td>Watlington</td><td>262</td><td>363</td><td>0</td></tr><tr><td>Woodcote</td><td>225</td><td>110</td><td>115</td></tr><tr><td colspan="4">Villages with allocations in this Local Plan</td></tr><tr><td>Berinsfield</td><td>274</td><td>48</td><td>0</td></tr><tr><td>Chalgrove</td><td>248</td><td>334</td><td>0</td></tr><tr><td>Nettlebed</td><td>46</td><td>19</td><td>0</td></tr><tr><td>Wheatley</td><td>305</td><td>138</td><td>0</td></tr></table> <p>* Completions and commitments as of 1 April 2020.</p> <p>The Local Plan is planning positively for further growth over the remainder of the plan period, ensuring that Larger Villages, including Sonning Common, continue to grow and support the services and facilities that sustain them.</p> <p>Policy H4 in the Local Plan states:</p> <p><i>‘1. A housing requirement of 257 homes will be collectively delivered through Neighbourhood Development Plans and Local Plan site allocations at the Larger Villages as follows:</i></p> <ul style="list-style-type: none"><i>- 46 homes at Nettlebed</i><i>- 96 homes at Sonning Common</i><i>- 115 homes at Woodcote</i> <p><i>2. If a Neighbourhood Development Plan has not adequately progressed with allocating sites* to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in that Larger Village will be supported provided that proposals comply with the</i></p>	Larger village	Core Strategy + 15% growth	Completions and commitments*	Outstanding requirement for NDP	Villages without allocations in this Local Plan				Benson	383	831	0	Chinnor	594	947	0	Cholsey	612	690	0	Crowmarsh Gifford	312	571	0	Goring-on-Thames	329	180	0	Sonning Common	377	281	96	Watlington	262	363	0	Woodcote	225	110	115	Villages with allocations in this Local Plan				Berinsfield	274	48	0	Chalgrove	248	334	0	Nettlebed	46	19	0	Wheatley	305	138	0
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Ref.	Section/Policy	Comment/Recommendation
		<p><i>remainder of the policies in this Development Plan.</i></p> <p><i>* the Plan has reached submission stage and has allocated sufficient housing sites.'</i></p> <p>The Local Plan sets out a requirement for 96 dwellings to be delivered in Sonning Common to be delivered through neighbourhood plan allocations or the contingency mechanism is part 2 of Policy H4.</p> <p>Within the Sonning Common Neighbourhood Area an appeal was allowed on 25 June 2021 granting planning permission for 133 dwellings (appeal reference APP/Q3115/W/20/3265861).</p> <p>Following legal advice, the district council made an application to the High Court for a review of this appeal decision. However, the district council was unsuccessful in the attempts to challenge the decision to overturn our refusal of the planning application.</p> <p>The Sonning Common Neighbourhood Plan Review was being prepared whilst the Little Sparrows appeal site was being challenged by the district council. Community groups can allocate sites which have been granted planning permission to safeguard their delivery and to ensure they count towards their identified housing requirements.</p> <p>With uncertainties surrounding the High Court challenge having been resolved we believe consideration should be given to allocating the appeal site to ensure it counts towards the requirement set out in Policy H4.</p> <p>The neighbourhood plan review also proposes an increase of units on SON 15 - carried over from the made neighbourhood plan, the retention of a reserve site allocation (SON 15) and a new reserve site allocation (SON 23).</p>

Ref.	Section/Policy	Comment/Recommendation
		We have made detailed comments on SON 15 and SON 23 later in these comments.
	Page 26 – Policy RH2	<p>The NPPG sets out that policies should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence. To ensure this policy has the clarity required by national policy and guidance, we recommend the following replacement wording:</p> <p><i>‘Proposals which deliver one, two and three bedroom homes will be particularly supported. Proposals meeting a specialist need such as for assisted living accommodation will also be supported.’</i></p>
	Page 26 – Policy RH3	<p>Paragraph 16 of the NPPF sets out how plans should serve a clear purpose and avoid unnecessary duplication. This policy as currently drafted makes multiple references to policy H16 in the South Oxfordshire Local Plan. Whilst this is the correct Local Plan policy reference, as currently drafted the opening paragraph of the policy is not drafted as policy text. We recommend the following replacement wording:</p> <p><i>‘Infill development is defined as the filling of a small gap in an otherwise continuous built-up frontage or on other sites within settlements where the site is closely surrounded by buildings. The scale of infill should be appropriate to its location. Development proposals will be particularly supported where they are of a design which:’</i></p> <p>In the third bullet point the text ‘external lighting’, should be a new criteria f).</p>
	<p>Page 27 – Fourth paragraph</p> <p>‘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</p>	<p>The final sentence of this paragraph refers to Sonning Common’s ‘true housing need’. However, the Sonning Common Neighbourhood Plan Review is not supported by a Housing Needs Assessment and the requirement for Sonning Common is as set out in the Local Plan. Paragraph 66 of the NPPF is clear in stating that once</p>

Ref.	Section/Policy	Comment/Recommendation
	Common's true housing need.'	strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirements. There has been no significant change in circumstances and to avoid confusion, we recommend this sentence is deleted.
	Page 29 – Policy RD1	<p>We support the ambition of this policy. It is wide reaching, touching on energy efficiency, water conservation, vehicle charging points and solar panels. Neighbourhood plans should be prepared positively, in a way that is aspirational but deliverable. Policy DES10 in the Local Plan provides flexibility, allowing applicants to identify the most effective way to meet the carbon reduction requirements.</p> <p>Policy DES9 in the Local Plan sets out how the council encourages schemes for renewable and low carbon energy generation. The council encourages schemes for renewable and low carbon energy generation and associated infrastructure at all scales including domestic schemes. It also encourages the incorporation of renewable and low carbon energy applications within all development. Policy DES10 in the Local Plan sets clear carbon reduction requirements for new housing, but allows developers to select the appropriate technology or fabric first solution to achieve this. DES10 recognises that there are many ways to achieve carbon reductions and the precise package is likely to be a site-specific solution which takes into account local constraints.</p> <p>Policy INF4 in the Local Plan sets out how new developments are required to be designed to a water efficiency standard of 110 litre/head/day (l/h/d) for new homes.</p> <p>Development Management have indicated that it would be helpful if the energy efficient standard can be quantified as it is in DES10 in the Local Plan. Taking into account these</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Local Plan policies, which are more detailed than Policy RD1 we recommend '<i>Where possible</i>' is inserted at the start of the policy, and '<i>as set out in the development plan</i>', is inserted after '...standards of energy efficiency and water conservation'. This will ensure that that the policy is not overly restrictive and give clarity to the decision maker as required by national guidance.</p> <p>To improve the clarity of the policy we recommend in the second sentence of the policy 'It must respect the scale and appearance of existing buildings responding', is replaced with '<i>Proposals should respect the scale and appearance of existing buildings, responding</i>'.</p>
	Page 38 – Policy RENV4	To ensure this policy has the clarity required by national guidance and to we recommend, ' <i>which are in accordance with other development plan policies and</i> ', is inserted between 'development' and 'which'.
	Page 38 – Policy RENV5	Whilst we support the ambition of this policy, it appears to overlap considerably with Policy RD1, in commenting on energy and water efficiency. Paragraph 16 of the NPPF sets out how plan should avoid unnecessary duplication. Therefore, we recommend that this policy is deleted and the text inserted into the supporting text.
	<p>Page 39 – Fourth paragraph</p> <p>'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 and is, consequently, a brownfield site. '</p>	Within this paragraph we recommend 'reserve' is inserted before '...site on Widmore Lane (SON 23)'. To reflect that this is only being proposed as a reserve allocation.
	Page 41 – Map 4.4	This map is incorrectly showing the Chilterns AONB boundary on the north-east side of Sonning Common, around Widmore Pond and south west of Spring Wood. We recommend that a replacement map

Ref.	Section/Policy	Comment/Recommendation
		showing the ANOB boundary correctly is inserted.
	Page 42 – Policy RDE1	<p>A neighbourhood plan should contain policies for the development and use of land. This proposed policy sets out that potential developers will be offered pre-application services, including the opportunity to present proposals to meetings of the parish council. This is outside the remit of what a neighbourhood plan policy can do.</p> <p>Paragraph 40 of the NPPF sets out:</p> <p><i>‘Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees before submitting their applications.’</i></p> <p>Taking the above from the NPPF into account, within the plan pre-application services can be encouraged, but this should not be presented as a planning policy. It is also potentially confusing, as it may encourage developers to approach parish councils for pre-application advice, rather than the district council, which may result in issues later when assessing planning applications.</p> <p>We recommend this policy is deleted and the text modified and moved into the supporting text, encouraging engagement and pre-application discussions with the district and parish councils.</p>
	Page 44/50 – SON 1	The narrative sets out how the designation of SON 1 as a Local Green Space is unchanged, however, the revised plan does not contain a clear policy setting this out. As

Ref.	Section/Policy	Comment/Recommendation
		<p>it is clearly the intention of the parish council to maintain this designation, we recommend a policy is inserted identifying SON 1 as a Local Green Space designation. A map identifying SON 1 should also be inserted. The policy should be presented in the same way as other policies in the plan – in coloured text boxes. We recommend the following policy wording:</p> <p><i>‘The Neighbourhood Plan designates SON 1 (Old Copse Field) as a Local Green Space, as shown on Map X. Development proposals within SON 1 will only be supported in very special circumstances.’</i></p>
	Page 47 - SON 23	<p>There is no indication that this site will become available during the plan period, and therefore we have concerns over whether it constitutes an appropriate allocation, even as a reserve site. As the site is currently in use as a car park providing a significant level of parking for the Johnson Matthey employment facility, the neighbourhood plan does not address what will happen to the parking provision, if the site were to be developed. If the site were to come forward for housing, it would be important that the location and extent of replacement car parking is considered and addressed.</p> <p>We noted in our Regulation 14 comments, that should the parish council wish to continue with the reserve allocation, the high brick and flint wall around the existing car park is considered a non-designated heritage asset. It is almost certainly the remaining part of the kitchen garden wall to the historic estate of Blounts Court and has some local heritage interest as a result. The main house and part of the former stable block are still extant within the Johnson Matthey Technology Centre. There remains some legibility of the presence of the former estate in this area, albeit altered by C20 development of the laboratories, which provides an indication of the historic development of this part of Sonning</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Common. As such, the Blounts Court buildings and former garden wall should be considered non-designated heritage assets. Therefore, their heritage interest would be a material planning consideration under the tests of para 203 of the NPPF.</p> <p>Whilst narrative has been added in the final paragraph of page 48 when discussing this site and the non-designated heritage asset, it has not been put into the policy.</p> <p>Therefore, if this reserve allocation is going to remain in the plan, we recommend some policy wording to identify there are known non-designated heritage assets on and adjacent to the site and that the historic interest of the former kitchen wall and relationship to Blounts Court should be assessed and inform any application.</p>
	Page 51/52 – SON 8	<p>Similarly to SON 23, there is no indication that this site will become available during the plan period, and therefore we have concerns over whether it constitutes an appropriate allocation, even as a reserve site.</p> <p>As the site is currently in use as a gymnastics centre, the plan correctly highlights Policy CF4 ensures sport and recreation facilities are protected, maintained and where possible enhanced. Whilst this is acknowledged in the plan, no solution is provided as to how this issue would be overcome to allow the allocation to come forward and give clarity to the decision maker, as required by the NPPG.</p>

Response 7

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Sonning Common Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email below:</p> <p>'Thank you for your notification of 27 January 2022 regarding the Reviewed Sonning Common Neighbourhood Plan Consultation.</p> <p>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.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.'</p>

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

Response 8

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Sonning Common Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email below from Kidmore End Parish Council:</p> <p>'Kidmore End Parish Council considered the Reviewed Sonning Common Neighbourhood Plan at its meeting yesterday. The Council supports reviewed Plan.'</p>

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	Roger Penfold
Job title (if relevant)	Parish Clerk
Organisation (if relevant)	Kidmore End Parish Council
Organisation representing (if relevant)	-
Address line 1	30 Venetia Close
Address line 2	Emmer Green
Address line 3	-
Postal town	Reading
Postcode	RG4 8UG
Telephone number	-
Email address	rogerpenfold@btinternet.com

Response 9

Respondent Details

Information



Q1. Are you completing this form as an:

Organisation

Your comments

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

Response received via email from SSE. Please see below and attachments:

'Thank you for your message below, together with the link to the above NP web-site.

I can confirm that, at this present time, I have no further comments to make over and above those already made to the Deputy Clerk for Sonning Common Parish Council in my letters dated 20 February 2015, which for your information and assistance, I have attached.'

Q3. You can upload supporting evidence here.

- File: Chief Planning Officers - [redacted].pdf
- 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	Chris Gaskell
Job title (if relevant)	Network Connections Planning Engineer
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	chris.gaskell@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

Mark Smith
Network Operations and Planning Manager



OFFICE OF THE
DEPUTY PRIME MINISTER

Chief Planning Officers in England

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

Direct line: 0207 944 3940
Fax: 0207 974 5004
GTN: 3533 3940
John.Stambollouian@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,

JOHN STAMBOLLOUIAN

Your reference:

In Any Reply Please Quote: CJG/SCNDP_Sites_DOM

1 Woodstock Road

Yarnton

Kidlington

Oxfordshire

OX5 1NY

(Tel 01865 845888

+ eMail chris.gaskell@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.

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.

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,



Chris Gaskell
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 chris.gaskell@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,

A handwritten signature in black ink that reads "Chris Gaskell". The signature is written in a cursive, slightly stylized font.

Chris Gaskell
Network Investment Engineer

APPENDIX A

The identified areas are :-

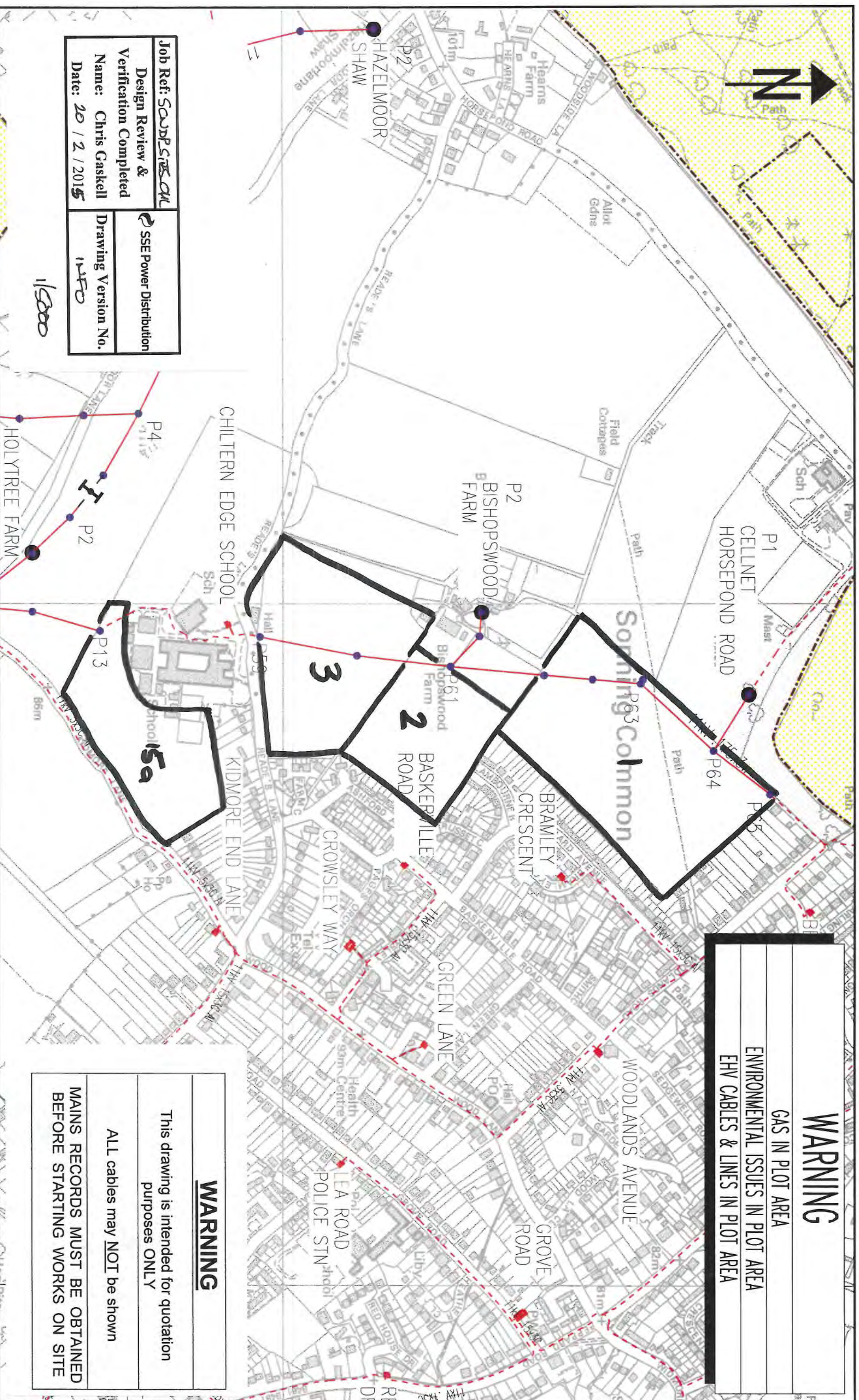
Area	Dwellings	Comments
SON 2/3	52	See Note 1
SON 6	26	See Note 1
SON 7/7a	30	See Note 1
SON 9	60	See Note 1
SON 15a	37	See Note 1

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: SC02P51534	SSE Power Distribution
Design Review & Verification Completed	Drawing Version No. 1.0
Name: Chris Gaskell	
Date: 20 / 2 / 2015	

NORMAL DEPTH TO THE TOP OF THE CABLE WHEN LAID					
	services	l.v.	h.v.	e.h.v.	
FOOTPATH		0.40m	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.			

WARNING

There may have been subsequent alterations to the surface level. Trial holes must be taken to determine positions and depth 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 G85 SHOULD BE CONSULTED. (AVAILABLE FROM HSE)

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Registered in Scotland No. 117710
Incorporated in Scotland
Perth, PH1 3AQ

UNCONTROLLED COPY

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

This drawing is intended for quotation purposes ONLY

ALL cables may NOT be shown

MAINS RECORDS MUST BE OBTAINED BEFORE STARTING WORKS ON SITE



Design Review & Verification Completed Name: Chris Gaskell Date: 20 / 2 / 2015	 SSE Power Distribution Drawing Version No. 1250
---	---

WARNING

D CROSSING 0.60m 0.60m 0.75m 0.90m

services – up to 1000V.

- over 1000V, to 11,000V.

– 22,000V. to 132,000V.
e.h.v.

BASED UPON THE ORDINANCE SURVEY MAP WITH THE SANCTION OF THE
CONTROLLER OF H.M. STATIONERY OFFICE. CROWN COPYRIGHT RESERVED.

This copy has been made by or with the authority of SOUTHERN ELECTRIC plc pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act), unless the Act provides a relevant exception to copyright. The copy must not be copied without the prior permission of the copyright owner.

Tomelito: SALS NEGUA CO. AS

Scottish and Southern Energy plc.
Registered in Scotland No. 117119.
Registered Office: Inverleith House
200 Dundee Road,
Perth, PH1 3AQ.

UNCONTROLLED COPY

Subject to Revision Master held at

H.V. MAINS RECORD

01189-126500	READING
--------------	---------



**Scottish and Southern
Energy**

Grid Ref: SU71167959

Scale: 1:5000

Date: 20/02/2015

Response 10

Respondent Details

Information	
[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 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 attachment.

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-03-15 Natural 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	Sharon Jenkins
Job title (if relevant)	Operations Delivery
Organisation (if relevant)	Natural England
Organisation representing (if relevant)	-
Address line 1	Hornbeam House, Crewe Business Park
Address line 2	Electra Way
Address line 3	-
Postal town	Crewe
Postcode	CW1 6GJ
Telephone number	-
Email address	consultations@naturalengland.org.uk

Date: 15 March 2022
Our ref: 381748
Your ref: Sonning Common Neighbourhood Plan – REG 16



Ms Rosalynn Whiteley
Enquiries/Assistant Planning Officer
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 Ms Whiteley

Reviewed Sonning Common Neighbourhood Plan – REG 16

Thank you for your consultation request on the above dated and received by Natural England on date 27th January 2022.

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

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

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

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

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

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

Yours sincerely

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Response 11

Respondent Details

Information	
[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 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 Plc.
Please see attachment.

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-03-17 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	Sarah Isherwood
Job title (if relevant)	Associate
Organisation (if relevant)	Vail Williams LLP
Organisation representing (if relevant)	Johnson Matthey Plc
Address line 1	Ground Floor Apex Plaza
Address line 2	Forbury Road
Address line 3	-
Postal town	-
Postcode	RG1 1AX
Telephone number	-
Email address	sisherwood@vailwilliams.com

Ref: SI/P18-514
Date: 16th March 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.

Vail Williams responded to the Sonning Common Neighbourhood Plan consultation in November 2021 and I have enclosed a copy of that letter for representation for ease. Johnson Matthey do not have any new evidence to submit for this consultation and will therefore not repeat what is set out in the enclosed letter.

JM, as an important contributor to the local economy in this area, does however continue to support Sonning Common Neighbourhood Plan Group in their preparation of a revision to the adopted Neighbourhood Plan. The preparation of the revisions has gone through due process which has included consultation with the relevant stakeholders and community over the past few years. JM have continued to engage with Neighbourhood Plan Group about the future investment in the JM site which will continue to support the local economy. The revisions to the Neighbourhood Plan are in general conformity with the adopted SODC Local Plan 2035 and revised Neighbourhood Plan policies positively plan to support the strategic policies within the Local Plan whilst meeting the needs of the Sonning Common community.

I would be grateful if you could please notify me, acting on behalf of Johnsons Matthey of any further consultations on this Neighbourhood Plan or whether the Inspector intends to undertake a public hearing.

LISTEN

CARE



INNOVATE

LEAD



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



Sarah Isherwood MRTPI
Associate
For and on behalf of Vail Williams LLP
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Sonning Common Neighbourhood Development Plan
Parish Office
Village Hall
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Sonning Common
RG4 9RH

Sent via email: ndp@sonningcommonparishcouncil.gov.uk

Dear Sir/Madam

**Letter of Representation to Consultation of Sonning Common Neighbourhood Development Plan Revision –
Pre-submission Version (Draft) October 2021
Representor: Johnson Matthey Plc.**

Vail Williams LLP have been instructed by Johnson Matthey Plc (JM) to submit this letter of representation to the Sonning Common Neighbourhood Plan Revision (SCNDPR) 2021 consultation.

As set out in the SCNDPR the existing JM campus is located outside, but adjacent to, the Neighbourhood Plan boundary with the existing car parking site located within the Plan boundary. As a result, JM continue to consider themselves a part of the local community and it is therefore important JM support the local community in the preparation of a revised Neighbourhood Plan on which Sonning Common is seeking to '*grow and renew itself while enhancing and protecting its village character. (page 20)*' JM have undertaken extensive engagement with the local community over the last 3 years and have been open with the Neighbourhood Plan Group regarding JM's long-term aspirations at Sonning Common.

Employment

As recognised within the SCNDPR, JM are the biggest employer within the wider Sonning Common area (page 19) with around 300 employees working at the JM site. However, it is important to note that in relation to local employment, JM supports a variety of local businesses within the local area and wider South Oxfordshire District. Examples of this include:

- More than £500,000 spent on local maintenance service contracts each year
- £45,000 spent with local taxi services each year
- £340,000 spent on a catering contract with a local business and food supplies
- Last year visitors to the site spent more than 500 nights in local accommodation with more than 200 hotel rooms booked

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- 10,000 bus journeys to the site, keeping the local bus service commercially viable and accessible for residents
- Of the 285-permeant staff, 20 per cent live within five miles of the site

JM are therefore an important contributor to the local economy of Sonning Common in addition to the wider economy of Oxfordshire as a world-leading organisation in sustainable technologies research. It is important to note that the importance of JM as a local employer has been recognised by Sonning Common Parish Council and Rotherfield Peppard Parish Council who have supported JM in their future plans for the Sonning Common site.

In addition to the employment benefits, JM have also supported the local community over the years including:

- Carried out upgrades to the pavement and lighting on Widmore Lane.
- Supported the Widmore Pond committee in their work on and around the pond.
- Supported a number of local groups and charities through donations.
- Been a major contributor to the construction of the Squash Courts at Chiltern Edge School.
- Actively encouraged staff volunteering with all staff having 2 days a year available as paid leave for voluntary work.
- Actively encouraged staff to participate in STEM activities off site.
- Brought children from local schools and colleges to the Sonning Common site as part of the STEM outreach.

JM will continue to support the local community with a number of initiatives similar to those referenced above into the future.

In line with the NPPF policies, an existing employer such as JM should be supported to ensure they can continue to invest and adapt in Sonning Common site which will in turn support the local economy in and around Sonning Common, providing a wide variety of both scientific and non-scientific employment opportunities in line with paragraph 81 of the NPPF.

JM therefore support the principle of the inclusion of Policy RE1 in the SCNDPR which supports economic growth. However, to continue to support JM in future investment into Sonning Common, we would continue to promote the land to the west of the existing JM to campus for allocation within the SCNDPR for R&D employment and associated uses. (Plan 1 enclosed with this letter)

Allocation of the land to the west of the existing JM site for R&D and associated uses would provide JM to opportunity to continue invest in the Sonning Common site and lay the foundations for investment over the next 50+ years. The existing campus is constrained by a number of site constraints including the formal gardens to the east of the site, a number of specimen trees and established landscaping and TPOs which for part of the character of the Sonning Common site and the existing buildings on site all of which are fully occupied and operational. All of this limits the opportunities for further growth within the existing campus area.

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In conclusion, we support the employment policy proposed within the SCNDPR however JM continue to promote the land to the west of the JM site as an additional employment allocation because of the importance of JM and an existing employer within the Sonning Common area.

Housing

The SCNDPR proposes to allocate the existing JM staff car parking site as a reserve site for residential redevelopment of about 20+ units. (ref SON23). JM fully support the inclusion of the existing car park site for residential development which has been promoted through the NP process.

The site is fully brownfield with an existing access and is within easy walking distance of the village centre. It is acknowledged that the site is located within the AONB however the site is located on the very edge of the AONB and is fully covered with hardstanding and tarmac and therefore adds nothing to the scenic quality of the AONB. The site is also enclosed by an existing wall of over 2m in height along Blounts Court Road and part of Widmore Lane boundaries with existing structures or established landscaping around the remaining boundaries. The site is therefore well-screened and views into the site from long and medium range extremely limited with the site being difficult to view in the context of open countryside because of its relationship to Sonning Common. Because of the nature of the existing car park site in terms of its existing use and location within the village, JM support the proposals to include the site within the settlement boundary of Sonning Common defined by a local policy (page 22 of SCNDPR)

The allocation of the existing car park site for residential purposes would provide the village with a sustainable residential site which is of a size (circa 0.7ha) to allow housing delivery proportionate to the size of the village which is a clear preference of the local community set out in the SCNDPR and aligns with paragraph 70 of the NPPF which states that, *'neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 69a) suitable for housing in their area'*. JM therefore supports draft housing policies (Policies RH1-RH4) which seek to delivery a mix of new housing to meet local needs without having an adverse impact on the character of the surrounding area.

SON23 is deliverable as it is intended that the existing car park site is to become surplus to requirement for JM and therefore could be released from its current staff car parking use and used for residential development as effective re-use of a previously developed site to meet local housing needs. The site will become available once planning permission is achieved for the relocation of the car park as part of the customer innovation centre development proposals. JM therefore continue to promote the land to the west of the existing JM site for R&D related uses including a replacement car park as mentioned earlier in this letter to demonstrate how the replacement parking will be delivered within the Neighbourhood Plan.

As the Neighbourhood Plan Group are aware JM are proposing to relocate the existing staff car park to the north side of Blounts Court Road alongside the new Customer Innovation Centre as part of JM's future investment into the Sonning Common site (Plan 2 enclosed with this letter). The proposals have been submitted to SODC (reference P20/S2161/FUL) and are awaiting determination. It should be noted that Sonning Common and Rotherfield Peppard Parish Council's both unanimously support the application for the relocation of the staff car park alongside the Innovation Centre (comments published on SODC website) which has received no public objection.

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Conclusion

Paragraph 29 of the NPPF sets out that, '*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.*' JM have been part of the Sonning Common community for almost 50 years and continue to support a variety of local businesses and community initiatives within the area. Based on correspondence and consultation with the local community and local stakeholder groups it is clear that community do support JM in their aspirations for further investment and growth at the JM Sonning Common site to support local employment and businesses. The inclusion of Policy RE1 and allocation SON23 reflect the views of the local community and should be supported.

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



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Plan 1



JM Customer Innovation Centre
Illustrative Landscape Masterplan
18th May 2020 | Scale 1:500 @ A1
© 2020 JM Customer Innovation Centre

Response 12

Respondent Details

Information	
[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 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.
<ul style="list-style-type: none">File: 2022-03-17 Barton Willmore.pdf - [REDACTED]

Public examination

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

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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.



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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,



MICHAEL KNOTT

Partner

Enc.

cc. R. Crosthwaite - 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

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.

Killian Garvey

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.



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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.

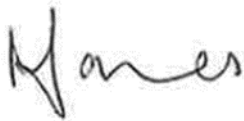
L&Q Estates also raise concern with the SCNDP Strategy relying upon two uncertain elements to meet the residual housing requirement (75 dwellings): namely extra care apartments and infill/windfall sites, the latter of which should make up only a very small proportion of the total housing supply for the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



KATHERINE JONES
Planning Associate

Encs.

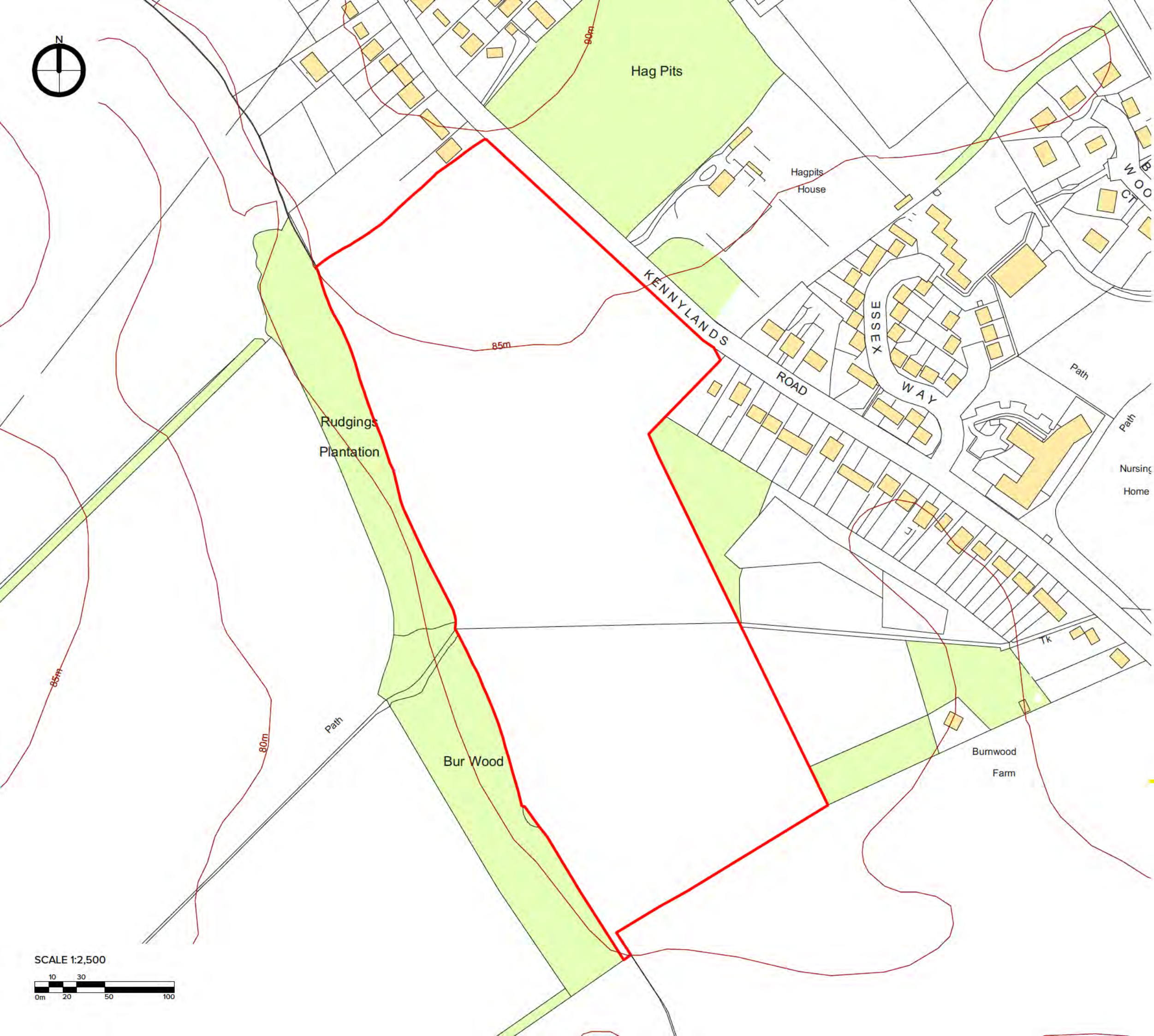
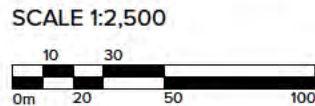
cc. S. Field - L&Q Estates (w/encs.)
E. Baker - SODC (w/encs.)

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.



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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,



MICHAEL KNOTT

Partner

cc. R. Crosthwaite - 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 13

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Sonning Common Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email from Oxfordshire County Council.</p> <p>Please see attachment.</p> <p>(Late representation received 08.26 AM on 18 March 2022)</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2022-03-18 OCC.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	Sarah Steere-Smith
Job title (if relevant)	-
Organisation (if relevant)	Oxfordshire County Council
Organisation representing (if relevant)	-
Address line 1	Oxfordshire County Council
Address line 2	County Hall
Address line 3	New Road
Postal town	Oxford
Postcode	OX1 1ND
Telephone number	-
Email address	Sarah.Steere-Smith@Oxfordshire.gov.uk

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING
CONSULTATION:**

District: South Oxfordshire

Consultation: **Sonning Common Submission Neighbourhood Plan**

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council welcomes the opportunity to comment on this Neighbourhood Plan and supports the Parish Council's ambition to prepare a revised Neighbourhood Plan.

Please see Officer comments regarding this Neighbourhood Plan in Annex 1.

Officer's Name: Sarah Steere-Smith

Officer's Title: Planner

Date: 17 March 2022

ANNEX 1
OFFICER ADVICE

District: South Oxfordshire

Consultation: Sonning Common Neighbourhood Plan 2021 – 2035 (Submission Document)

Team: Strategic Planning

Officer's Name: Sarah Steere-Smith

Officer's Title: Planner

Date: 11/03/22

Strategic Comments

We welcome the changes to Policies RVC2 and RTP1 – amended to include reference to OCC parking standards. Our Policy RTP3 wording suggestion has also been taken forward.

Archaeology:

- Our recommendation for a policy on the Historic Environment has not been taken forward and thus we reiterate our previous recommendation.

Education:

- The village's schools include the primary and secondary phases of Bishopswood (Special) School, we would welcome this school also being covered by policy RCSH2 – this change has not been made to policy RCSH2 in the Submission version of the neighbourhood plan and we would recommend it does.

We have received a no comment response from our Property and Minerals and Waste teams.

We do not wish to request a hearing but do request to be kept informed of decisions regarding this Neighbourhood Plan.

District: South Oxfordshire

Consultation: Sonning Common Neighbourhood Plan 2021 – 2035 (Submission Document)

Team: Oxfordshire County Archaeological Service

Officer's Name: Steven Weaver

Officer's Title: Planning Archaeologist

Date: 18/02/2022

Archaeology Comments

We would reiterate our previous recommendation that the Neighbourhood Plan be amended to include a policy on the historic environment (within its Environment Policies) as set out below:

Policy - Historic Environment

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

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

This policy would accord with the NPPF and Local Plan Policy.

District: South Oxfordshire

Consultation: Sonning Common Neighbourhood Plan 2021 – 2035 (Submission Document)

Team: Access to Learning

Officer's Name: Louise Heavey

Officer's Title: Information Analyst

Date: 02/03/2022

Education Comments

As of the pupil census in October 2021, Sonning Common Primary School had 372 pupils attending. Maiden Erlegh Chiltern Edge had 343 pupils, and Bishopswood School 77, as of the same date.

As indicated previously, the village's schools include the primary and secondary phases of Bishopswood (Special) School, and we would welcome this school also being covered by policy RCSH2.