Consultation Statement

Chinnor Parish Council

- 1. This Statement has been prepared by Chinnor Parish Council (the Parish Council) to accompany its submission to the local planning authority, South Oxfordshire District Council (SODC) of the Chinnor Neighbourhood Development Plan 2011 2035 (the Neighbourhood Plan) under Regulation 15 of The Neighbourhood Planning (General) Regulations 2012.
- 2. The regulations state that where a qualifying body submits a plan proposal to the local planning authority, it must include a consultation statement. A "consultation statement" means a document which:
 - (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. The Chinnor Neighbourhood Plan 2011-2035 is a review of the made Chinnor Neighbourhood Plan (May 2021). In 2023, the Neighbourhood Plan steering group decided that it would be prudent and necessary to update the made plan to take account of recent planning appeals and decisions that have allowed significant new housing developments to be built in Chinnor.
- 4. The most recent version of the Chinnor Neighbourhood Plan was formally 'made' by South Oxfordshire District Council on 20th May 2021, and subsequently has formed an integral part of that Council's Development Plan.
- 5. Chinnor Parish Council and its Neighbourhood Plan Steering Group have prepared an update to the Plan. Changes to the Plan have been made in the following areas:
 - a) **Vision:** The vision has been reworded while the overall themes are consistent, some clarity and context has been added.

b) Objectives:

- Objectives 2, 4, 5 and 6 have been reworded to give greater clarity and strength to the message being put across.
- Objectives 3 and 7 have had very minor changes.
- There is a new Objective Objective 8. Covering points already existing in other objectives, it centralises these around the natural environment and protecting it for the benefit of both people and the environment itself.
- c) Policies: Most policies are unchanged. Those that have been changed/updated are:
 - CH H1 Infill Residential Development. Updated an Appendix reference (not material)
 - CH H2 Affordable housing. Updated to include "or where a site has an area of 0.5 hectares or more" to better align with South Oxfordshire Policy H9.

- CH H6 Site allocations. Updated to show yet to be completed allocated sites since 2021. Allocated sites that have been completed are now shown in a separate table outside of the policy itself.
- CH H8 Sustainable homes. Renamed from CH GP4 previously.
- CH C1 Design. Updated an Appendix reference (not material).
- CH C3 Heritage Assets. Replaced the wording "The demolition or partial demolition of a listed building or other character buildings worthy of consideration as non-designated heritage assets above or below ground" with "Any proposals that will result in harm to a listed building or non-designated heritage asset". This is to be more closely aligned with national and local policy and does not change the purpose of the policy.
- CH GP1 Local Green Spaces. Added Mill Lane Community Garden as a new local green space, and amended the area of local green space 14, Greenwood Meadow Open Greens, due to the smaller section of the space no longer meeting the NPPF local green space criteria.
- CH GP2 Protection of Habitats of Significance. Refined/clarified the biodiversity gain target (net 10%).
- CH CF1 The Protection of Community Facilities. Updated the list of community/retail buildings.
- CH E1 Education Facilities New Policy. Similar to the medical facilities policy (CH CF2), stating that Chinnor would look favourably upon plans for a new school/pre-school or a plan to expand what is already present.

d) Chinnor Parish Council Action Points: Minor changes to:

- Action Point 3 clarifying speed reduced network and noting the addition of pinch-points on entrances to the village.
- Action Point 4 clarifying the changes with the 20mph speed limit.
- Action Point 7 adding a couple of organisations and mentioning climate change.

Major changes to:

- Action Point 6 – adding in other projects that the Council could ask for funding for through CIL and removal of burial ground project.

Finally, facts were updated as appropriate to cover the intervening time from May 2021.

- 6. The reviewed Chinnor Neighbourhood Plan was subject to a Regulation 14 consultation with the community, key stakeholders statutory consultees and the planning authority. The consultation period was from 21st July 2023 3rd September 2023.
- 7. A copy of the text of the notification is attached in **Appendix 1**.
- 8. The consultation was advertised on the Parish Council newsletters which is emailed to anyone who registers to receive one and printed copies were made available from The Library and the PC Office. The consultation was put in the Chinnor Pump a monthly newsletter distributed freely to every household in our parish. Notices were placed on every public notice board, a

notice was placed on the PC website, posts were made to community Facebook groups and Neighbourhood Plan consultation information cards were made and placed at community events.

- 9. Individual notifications were sent to statutory consultees via email as follows:
 - Oxfordshire County Council
 - South and Vale Council
 - South Oxfordshire District Council
 - Vale of White Horse District Council
 - The Coal Authority
 - Homes England
 - Natural England
 - Environment Agency
 - Historic England
 - Network Rail
 - Highways England
 - Marine Management organisation
 - British Telecom
 - EE
 - Vodaphone & O2
 - Oxfordshire Clinical Commissioning Group
 - NHS England
 - National Grid
 - Scottish and Southern Energy
 - UK Power networks
 - Thames Water
- 10. In addition, the following bodies were also consulted via email:
 - Voluntary bodies, groups and organisations listed on the PC website
 - Three known religious groups in the parish area
 - All known local business within the parish.
- 11. Local groups and organisations were consulted via email. These are listed in **Appendix 2**.
- 12. The parish council is not aware of any groups in the parish that represent the interests of disabled persons or the interest of different racial, ethnic or national groups. However, the Chinnor Parish Council is an inclusive council and believes that every resident regardless of their ethnicity or race will have received this information.
- 13. People and organisations who had originally been invited to comment on the original neighbourhood plan were consulted again and additional contacts were added.
- 14. All responses to the Regulation 14 consultation were considered. These have been summarised in **Appendix 3** which also summarises how the representations were addressed.
- 15. **Appendix 4** is a table setting out how the representations from SODC were addressed. The letter is attached as a separate document.

Appendix 1: copy of email/letter sent to advertise Regulation 14 Consultation

Chinnor Neighbourhood Plan 2023 Update Public Consultation

The Chinnor Neighbourhood Plan was last made in May 2021 following a successful referendum. Chinnor Parish Council, via the Neighbourhood Plan Working Group, has now prepared an update to its Neighbourhood Plan.

As part of the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, a pre-submission consultation is taking place between 21st July 2023 and 3rd September 2023.

The plan and supporting documents, including a Modification Statement, can be viewed online at: https://www.chinnor-neighbourhood-plan-2023.com/

Additionally, copies of the plan are available to be viewed at:

Location	Address	Opening Hours
Chinnor Parish	The Community	Monday – Thursday: 9am-1pm
Council Offices	Pavilion, Station	Friday – Sunday: Closed
	Road, Chinnor OX39	
	4PU	
Chinnor Library	Station Road,	Monday: 9:30am – 12:30pm, 2pm – 5:30pm
	Chinnor OX39 4PU	Tuesday: Closed
		Wednesday: 9:30am – 12:30pm, 2pm – 5:30pm
		Thursday: 2pm – 7pm
		Friday: 2pm – 5:30pm
		Saturday: 9:30am – 1pm
		Sunday: Closed

This consultation commences on 21st July 2023 and the closing date for representations is midnight on 3rd September 2023. We would greatly appreciate if you could respond at the earliest opportunity. Should you consider your interests are not affected by the neighbourhood plan or you do not wish to make any comments, we would be grateful if you could confirm this in writing.

Representations can be made in one of three ways:

- Send by email to: ChinnorNP@chinnorpc.org
- Send by post to: Chinnor Parish Council Office at The Community Pavilion, Station Road, Chinnor OX39 4PU
- Use of the comment form on the website linked to above.

Privacy Statement:

Chinnor Parish Council will store your personal data securely and will use it only for necessary purposes in the progressing of this consultation which may include sharing some information with South Oxfordshire District Council.

In preparing the Consultation Statement, we will include names for any organisations or agents, but will anonymise responses received from individuals.

Appendix 2: Groups and organisations consulted at Reg. 14 stage of the NDP

Local MP

Local Councils

Sydenham PC

Aston Rowant PC

OCC

SODC

Other Locals & Groups

C&PRR

Christian Aid

Community Church

Community First Responders

Community Orchard

Community Pavilion

County Councillors

Cross Keys Patient Participation Group

District Councillors

Fair Trade

Friends of the Earth

Friends of Library

Good Neighbours

Greening Chinnor

Guides

St Andrews School Headteacher

Mill Lane School Headteacher

Chinnor Heritage Group

Methodist Church

Mill Lane School Governors

Parish Council

Red Kite Family Centre

Royal British Legion

Scouts
St Andrews Church
St Joseph's RC Church
U3a
Village Centre
Village Hall
Women's Institute/Reading Room
Chinnor Youth Football
Chinnor FC
Chinnor Warm Places
Rotary Club
Jack and Jill Preschool
Thames Valley Police
Chinnor Badminton Club
Chinnor Activity Group
Chinnor Beavers
Chinnor Silver Band
Flight Bladder Cancer Group
Cha Cha Chimps
Roma Lousia Dance Academy
Whiteway Fitness
Chinnor Allotments
Country Dancing Group
Bytomic TaeKwonDo
Chinnor Cards Group
WYG Group
Jake Collinge Planning Consultancy
CPRE

Appendix 3: Summary of representations received to the Regulation 14

Number	Consultee	Date	Summary of comments	Response
1.	Individual	22/07/23	Updated data from 2021 Census to include in plan	Where the provided updated census data could be corroborated it has been updated in the plan. The timing of this update means that not all updated 2021 Census data is available for use, and more is becoming available over time, as noted in 2.3.
2.	Individual	21/07/23	Neighbourhood Plan does little in terms of required infrastructure in the village. Better communication required from the council. Accusation of bribery in the council to "pass appeals".	The lack of required infrastructure is a noted limitation in the village in the plan, and by the council. Alongside the next major iteration of the NP the council plans to have a separate Infrastructure Report to address this issue more clearly. Council communication can always be improved and is being worked on. The council stands by its stance on appeals, including taking Rule 6 status on an appeal for a development off Thame Road which is not an allocated site in the Neighbourhood Plan – where the council opposes the development.
3.	Individual	31/07/23	Notice of support of the modifications to the plan.	The support is noted and appreciated.
4.	Individual	06/08/23	•	This thorough review and input by a resident was greatly appreciated by the Neighbourhood Plan team, and the individual has separately been encouraged to actively input for the next review. All points raised in the submission have been considered and addressed where deemed necessary. The response to the specific points shown in the summary are as follows:
			3. Vision and Objective 4 – concern that more development will come before already needed infrastructure. 4. Infill Policy CH H1 – concerns on wording given previous	 Noted and appreciated, document updated. Data updated where possible – it is noted that the 2021 Census data is still in the process of being released and wasn't all available at the time of initial consultation version. Where possible, data has been updated with latest data. Noted, and the NP group agrees that improvement in infrastructure is already needed across the village, as

Persimmon
development.

- 5.Retirement Housing policy concern on wording given Oakley Road development.
- 6.Open Spaces to include spaces in new developments that are managed privately.
- 7.Note around Old Kiln Lakes and protection of remaining wildlife site.
- 8.CH GP3 suggested additional wording on horse friendly surfaces.
- 9. 6.14 concerns around "well-lit" requirement and how this fits with minimising light pollution.
- 10. 6.16 Clarification on who "the Community" means.
- 11. CH CF1 comment around potential additions.
- 12. 8.5. Request to stop comparing Chinnor to Watlington.
- 13. 8.12 Comment on updated classes.
- 14. 8.22 Request that the policy is removed or clarified given it concerns OKL and

- noted throughout the plan. However, this is to note that **if** extra development is to be supported then extra infrastructure will need to be a key part of that discussion/support.
- 4. Noted, however the policies, and allocations, of the plan need to be taken as a whole. There is currently no extra development/growth requirement for Chinnor during the plan period, as confirmed by both SODC and OCC.
- 5. Similar response to 4.
- This has been noted and will be included for the next review of the plan. The current plan does not consider privately managed spaces.
- Noted. This is not necessarily a needed addition to the plan, but will separately be considered by the council and will be added as a point to be considered for the next review.
- 8. We believe the wording does not preclude the proposed addition, indeed the specific noted (no tarmac) would already be covered by the Council's environmental policy. So, no change proposed now, but it will be added as a point to be considered for the next review.
- There is a compromise to be struck. We sought to achieve an appropriate balance..
- 10. The community are community groups such as Friends of the Earth and Greening Chinnor.
- 11. We would welcome specifics to be considered for the next review.
- 12. Watlington is deliberately used as a comparison as it is classed as a "Large Village" in the SODC Local Plan, as is Chinnor, so is our nearest direct comparison in that regard.
- 13. Noted and appreciated. Clarification added in plan.
- 14. This is not a policy. Generally, we believe this paragraph still holds, and any development will be bound by the council's environmental policy etc.
- 15. Noted this section's data has been updated appropriately.
- 16. The fact is, as noted throughout the plan, Chinnor's schools are already full.

			potentially the wildlife area there. 15. 9 – request to update data here to match earlier sections. 16.CH E1 – Is it wise for Chinnor to welcome new schools, especially when there is an appeal for development of a field to the rear of Mill Lane Primary School? 17.Action Point 1 – update to allow for permitted development options 18. 10.13. No mention of equestrians. Plan doesn't mention them at all, not good enough. 19.No mention of protecting the environment from light pollution.	So regardless of any potential future development, there is an accepted need for improved school facilities. This policy is more around how any proposed additions/expansions would be designed/located, rather than if they're "needed". 17. We don't believe Action Point 1 needs to be updated to allow for this as the point is sufficiently broad that this specific can be considered within it. 18. We appreciate the comment and have updated regarding equestrians where specific comments have been made. We encourage the respondent to become an active member of the NP Group to help allow more fully for equestrians in future plans. 19. This has been noted and will be included for the next review of the plan.
5.	Individual	10/08/23	Noting that for Unity Health access to own transport to Thame or Princes Risborough may be required as blood tests are not always available in Chinnor	This is noted, but more corroboration will be needed to insert this into the plan. It will be investigated more fully for all healthcare providers in Chinnor for the next review.
6.	Individual	14/08/23	No constructive comments to add as the plan does not affect them	We appreciate that you took the time to read the plan. We would note that while the direct impacts may not always be clear, the policies and objectives within the plan
				have the potential to impact all within the village.
7.	Individual	17/08/23	2016 survey is too old to rely on	No updates to plan. To respond to the comments:

		1	traffic in general	noting that the pressures have only
			Note on proposed one-way system and question on HGV restrictions Note that Action Point 3 does not help with speeding in the village. A question around the colouring of sites within the Appendix 5 assessment	increased since then. While action may indeed be required, this is not within the control of the Parish. The one-way system idea is noted in Appendix 2 and can potentially be addressed in more detail at the next review. Any HGV restrictions would be welcomed but are not under control of the Parish. SODC can be contacted about this. We respectfully disagree on the points on Action Point 3. Data suggests average speeds have reduced, although the point on police action is noted and supported. The point on infrastructure limitations is noted and agreed with. However, there are difficulties in improving infrastructure without development. On the Appendix 5 point, this was an independent review by Pellegram's and has not been updated in this update of the Plan.
8.	Parish Safeguarding Officer/C&PRR		Mention of Wee Bookshop should be removed Notes around location of development sites CHI1, CHI20 and CHI21 with relation to the railway. A request to add C&PRR as a specific heritage asset within CH C3 Note on CH CF1and adding the "Railway" as a whole and not just the station building	All these are noted, although no material changes are proposed at this time, but can be reviewed for future revisions. On the Wee Bookshop, this is mentioned in an Appendix relating to trees – the reference has been updated to reference Cob Cottage Café. On the development sites, these already have planning permissions and conditions around noise. On CH C3, no specific assets are listed, the Railway is implicitly covered and the policy will not be updated to mention one asset in particular over any other On CH CF1, this is noted, but the list is there to cover the facilities/buildings actively used by the community, not necessary the supporting infrastructure (which are implicitly covered).
9.	Individual	21/08/23	Happy with the revised plan	The support is noted and appreciated.
10.	Individuals	24/08/23		Support and additional concerns noted, thank you.

			and lack of affordable housing for local people.	
11.	Individuals	24/08/23	Agree with the amendments and hope the plan is recognised and respected by the next levels of governance after the Parish Council. Confused by the percentages in item 2.24 regarding house prices.	Support is noted and appreciated. Item 2.24 has been amended.
12.	Individual	24/08/23	Found modification statement useful, understood and accepts revisions made. Noted that they do not support the traffic obstacles that have been installed.	Support is noted and appreciated. View on traffic obstacles is also noted, although this is not the overall view shared by the Council.
13.	OCC	25/08/23	Strategic comments: Note that there is no future growth requirement for Chinnor, as it has exceeded its designated 15% growth in the SODC Local Plan. Note around overlaps between Local Green Spaces and Highway land, maintained by OCC. OCC have requested that local green space maps are altered to remove any overlap by reduction of the green space's size, as any Highway work will take precedence. Recommended extra granularity on historic environment and heritage assets. Recommended addition around drainage standards.	We welcome the acknowledgement that Chinnor has exceeded its growth requirement and no extra growth is required. On the Local Green Space and Highways overlap, we do not wish to alter the maps in the plan as they are there to show the spaces as used by the community, not who may have precedence legally. We note most of these green spaces were in previous Made versions of the plan and no comment was made. CPC acknowledges and accepts the legal precedence of Highways over any overlap and will add wording to the plan to cover this. Regarding the environment and heritage asset and drainage points — both were made during the previous revision, and we see no reason at this point to change our answer with regards to these. They will be more fully considered in the next full revision of the plan.

14.	SODC	30/08/23	Specific changes proposed	See Appendix 4
15.	Individual	29/08/23	Agree with plan	Support is noted and appreciated.
16.	Turley on behalf of Gleeson Land	01/09/23	Points around: Modification Statement – the changes are material and should require a referendum. CH H6 Site Allocations – Sites completed should be shown as existing commitments, and not allocations. CH C1 – An appendix reference is incorrect. Some of the aspects are too specific. CH GP1 – The new allocation does not	Modification Statement: The Parish Council is required to produce the modification statement. The Parish Council has carefully considered the nature of the changes proposed and feels they have achieved the correct view. The modification statement has been updated, where necessary, following the pre-submission consultation. Site Allocations: The South Oxfordshire Local Plan set the housing requirement for Chinnor during the plan period to 2035. The Chinnor NP Review contains policies and allocations which meet and in fact exceeds the identified housing requirement. Design – The Appendix reference has been updated, and we are comfortable with our requirements which are consistent with the
			meet the specifications of a Local Green Space. CH GP2 – The 10% net biodiversity gain requirement is too strong when compared to the Local Plan policy. The upcoming Environment Act will include this 10%	Local Green Spaces: Wording around green spaces has been updated to better clarify which spaces are seen as major and which space is new, however we believe our designations, both in the existing made plan and the proposed new local green space at Mill Lane meet the relevant tests for designation. Maps were reviewed and updated where appropriate.
			requirement and so it is unnecessary to include in the Plan. CH E1 – Education –	Protection of Habitats: We are pleased that the upcoming Environment Act is coming into force and we consider it aligned with the ambitions of the made and reviewed plan. We believe it is important for our plan to be updated and reflect the latest
			this policy does not allocate a specific site for expansion. Additionally, the policy should be updated to reflect the current situation at Mill Lane where OCC have "agreed" to expand the school.	Education: The policy does not need to allocate a site. Any potential expansions to Mill Lane, or any other school, do not supersede the policy or the reasoning of it. This has also been confirmed by OCC officers. As noted by OCC (see below), only the replacement of the current temporary classrooms with permanent ones, with no increase to capacity has been committed

		Basic Conditions – SEA Screening Statement has not been completed.	to. Basic Conditions : SODC has undertaken the necessary SEA Screening.
17. Natural England	31/08/23	No specific comments. Further information provided to assist with future plans.	Noted and appreciated – this will be factored into the next review.
18. Individual	02/09/23	Totally opposed to all major new housing developments due to infrastructure limitations.	Noted.
19. Individual	03/09/23	Happy with the updates	Support is noted and appreciated.
20. Individual	31/08/23	•	1. 2.11: Reasoning around using the LSOA codes has been provided in the text above the table. The important point is to note that data for the area relevant to Chinnor is being aggregated here. 2. 2.29 – wording updated 3. Objective 2 – you can see how each policy is linked to objectives in the table in 3.3. 4. 3.10 – As noted this is covered in more detail in Section 9 5. 4.2 – We believe these are covered in CH H8 and Appendix 3 6. CH H4 – noted and will be put into the discussion for the next revision of the plan. 7. 4.31 – Noted, but this is not a policy in and of itself, CH H8 is. The plan cannot be just negative towards development. 8. CH H8 – same as above. 9. St Andrews Graveyard: Noted. This currently is not considered within our definition of a community green space, but we will open it for consideration at the next review. 10. We agree the pharmacy is important. This is noted in Section 8.14. Unfortunately the Parish Council has not direct control over expanding/new pharmacies in the village. 11. Noted – and this will added as a point to address in the next plan update. 12. Noted. This has already been brought to the attention of the Council. No formal decision has been made yet, so will not be added specifically to this list at this time. If formal progress around acknowledgement

	replacements for Bledlow Ridge 12. 10.13 Include reference to replacement of Chinnor Allotment Distribution Centre 13. Appendix 2 – reference to nonexistent map 14. Appendix 4 – no mention of trees at St Andrews Church	of this need is made before the next revision, it will then be included. 13. Noted and amended 14. Noted – this will be investigated and updated if possible/relevant.
21. OCC	2.47 – statement that both schools are being considered for expansion is out of date as both already have been. 9.2. Should this 420 instead of 320? 9.3. Para contradicts itself. Mill Lane does have capacity to expanded by 105 places with substantial building work. Based on the NP housing allocations, OCC assessment is that such expansion would not be sustainable. Only further unplanned development would require expansion of Mill Lane Primary School. OCC has committed to replace the temporary classrooms with permanent accommodation with no increase to capacity. 9.4. Note that St Andrew's has two halls, and while the rebuilding was cancelled, OCC has invested money to	2.47 Noted – this statement has been removed. 9.2. Yes – updated. 9.3 Para updated to clarify that Mill Lane can only be expanded with significant building work and the only commitment from OCC is to replace the current temporary classrooms with permanent ones with no increase to capacity. 9.4. Noted – we believe the statement still holds so have not updated.

	address backlog	
	repair and	
	maintenance issues.	

Appendix 4: response from SODC with table setting out how comments were taken into account

SODC letter reference	Decrease
number	Response
1	Accepted
2	Updated
3	Updated
4	Noted – Renewable Energy generation will be considered in the next version of the plan
5	Accepted
6	Accepted
7	Accepted
8	Accepted
9	Accepted
10	Accepted
11	Accepted
12	Noted
13	This is a made policy, so no change currently. But the potential additions are noted and welcomed and will be part of discussions for the next revision of the plan.
14	Accepted
15	Accepted
16	Accepted
17	Accepted
18	Accepted
19	Accepted
20	Accepted
21	Accepted
22	Noted
23	Accepted
24	Accepted – the potential additions are noted, and will be part of discussions for the next revision of the plan
25	Accepted
26	Noted – this will be considered more fully in the next update to the NP
27	We made reasonable and wide efforts to raise awareness of the plan and its proposals to people that live and do business in the area.
28	Noted
29	Accepted
30	Accepted
31	Accepted
32	Added

33	Noted
34	Accepted
35	Accepted
36	Accepted
37	Accepted
38	Noted
39	Accepted
40	Accepted
41	Accepted
42	Accepted
43	Accepted
44	Accepted
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71	Accepted
72	Accepted

Policy and Programmes

Head of Service: Tim Oruye



Listening Learning Leading

Contact officer:

@southandvale.gov.uk

Tel: 01235 422600

Textphone users add 18001 before you dial

30 August 2023

<u>Chinnor Neighbourhood Development Plan Review II – Comments under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)</u>

Thank you for giving the Council the opportunity to offer formal comments on your draft Neighbourhood Plan Review. We would like to take this opportunity to complement you on the preparation of a very thoughtful and well-produced NDP Review and Appendices.

Having seen a complete draft, we are able to offer further advice under our duty to support neighbourhood plans. Our response focusses on helping the Review meet the basic conditions as specified by the regulations.

We are committed to helping this NDP Review 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 have produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP Review, 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.

Yours faithfully,



Senior Planning Policy Officer (Neighbourhood)

Ref	Section/	Comment/Recommendation
1.	General comment – policies	The previous format for policies, including a blue box and standard lowercase wording, made it easy to find and identify policies quickly. The change to a use of capital letters throughout policies, without a distinct box, makes them more difficult to read for users with visual difficulties. We recommend returning to the original policy format/layout.
2.	Page 16	2.13 and 2.14 – we recommend updating these paragraphs, to provide the most up-to-date information, by addressing population data from the 2021 Census – you can build a parish profile here https://www.ons.gov.uk/visualisations/customprofiles/build/ .
3.	Pages 19 – 21	We recommend updating the figures in these sections using the ONS data from the 2021 Census – see details above.
4.	Page 28	Our Climate Team commented that the group have clearly considered the climate and ecological emergency during the preparation of the plan. They welcome Objective 2, that ensures that sustainable building practices are used for all new development to ensure resilience to climate change.
		To further address the climate emergency, they suggested considering the addition of a policy on renewable energy generation.
5.	Page 30-32	The previous table-format of presenting themes/number of comments has been removed. We recommend this is reinserted, for clarity, as some of the numbers have become mis-aligned.
6.	Page 32	This page states that 'Feedback from that event can be found in Appendix 1'. As Appendix 1 now addresses Local Green Spaces, we suggest this reference is either removed or renumbered.
7.	Page 39	Policy CH H1 Infill Residential Development
		This policy states 'DESIGN GUIDANCE IS SET OUT IN CH C1 AND APPENDIX 4'. This reference should be amended to 'Appendix 3' to match the renumbering of appendices.
8.	Page 40	Policy CH H2 - Affordable Housing
		Our Affordable Housing team have suggested a minor update to this policy as follows, to link with South Oxfordshire Policy H9: Affordable Housing:
		Developments that result in a net gain of 10 or more dwellings, or where a site has an area of 0.5 hectares or more, should provide a minimum of 40% of affordable housing on the site which will be

		fully integrated into the development unless a financial viability assessment or other material consideration demonstrates a robust justification for a different percentage.
9.	Page 44	The following sentence should be amended to address the renumbering of appendices:
		To this end, all available known proposed development sites were assessed in the Site Allocation exercise in Appendix 6 5 using methodology agreed with the Local Planning Authority.
10.	Page 45	Policy CH H6 – Site Allocations
		This policy has split the sites that have been completed from the remaining allocation. We recommend not including the completed sites within the policy text, to ensure the position is as up-to-date as possible for decision-makers, when applying policies. Please see the example of the Brightwell-cum-Sotwell Draft Review plan , which removed a previously allocated site that had already been completed (Policy BCS3: Land at Little Martins and Home Farm Barns in the 'made' Plan).
		We recommend the following amendments to the beginning of the policy, which include moving the first paragraph, quoted below, out of the policy and into the supporting text, for clarity:
		POLICY CH H6 - SITE ALLOCATIONS
		COMPLETED LAND AT THE FOLLOWING LOCATIONS, SHOWN IN FIGURE 1, ARE WERE ALLOCATED FOR HOUSING DEVELOPMENT AS FOLLOWS IN THE 2021 CHINNOR NEIGHBOURHOOD PLAN AND HAVE NOW BEEN COMPLETED:
		()
		POLICY CH H6 - SITE ALLOCATIONS — NOT COMPLETE
		LAND AT THE FOLLOWING LOCATIONS, SHOWN IN FIGURE 1, ARE IS ALLOCATED FOR HOUSING DEVELOPMENT AS FOLLOWS:
11.	Policy CH H7	The policy refers to 'infill development as defined in H1' we believe this reference relates to Policy CH H1 and this should be corrected.
12.	Page 46 and 50	We suggest Figures 1 and 2 are updated slightly, to add a new key, with 'allocations complete' remaining in blue and 'housing allocation' recoloured purple, for example.
13.	Page 52	Policy CH H8 – Sustainable Homes

	 Our Climate Team commented the following: 'Really welcome the intention of this policy, it could be further strengthened to really push for high standards. The wording at the head of the policy could be turned around to read that that applications which do not incorporate the following sustainability features will not be supported. Building orientation can also have an influence on whether a building overheats during periods of intense heat which will become more common with climate change – this could be an important factor in our ability to cope with the impacts of climate change. You may wish to be more specific about the amounts of energy generation and insulation, or even to require net zero carbon development. This guidance from the Centre for Sustainable Energy includes some good examples of policies to deliver climate-ready homes. The encouragement of sustainable drainage systems is excellent. This could be strengthened by adding a requirement that development should not add to existing site runoff. I would recommend also setting out clearly the expected quality and functionality of the SuDS (this would be in line with Policy EP4 in the South Oxfordshire Local Plan which says that SuDs 'should seek to enhance water quality and biodiversity in line with the Water Framework Directive'). Harpenden Neighbourhood Plan contains a
	strong policy on managing surface water flood risk (see page 61 of this guide).
Page 53	Our Conservation Officer has commented that: 'Paragraph 5.4 states that: 'Chinnor Parish includes two Conservation Areas and more than 30 listed buildings'. It would be helpful to name the Conservation Areas explicitly, which are Chinnor Conservation Area and Oakley Conservation Area. It is noted that these feature on the Site Allocation review in Figure 4 and it would be useful to cross reference these.'
Page 54	The following sentences should be amended to address the renumbering of appendices: Design Guides are referenced in Appendix 4-3-, Together with the Chinnor Design Statement, also in Appendix 4-3
Page 54	We recommend the following minor amendment to paragraph 5.7 to ensure it is factually up-to-date, as there is no local list: Policy CH C3 establishes key principles that will be applied to development proposals that affect the setting of listed buildings or other character buildings identified on future the local lists.

		Should you wish to explore preparing a local list you can find out more here: https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/ .
17.	Page 55	Our Conservation Officer has commented:
		'POLICY CH C3 - HERITAGE ASSETS
		The highlighted section below should be altered as follows 'Any proposals that will result in harm to a listed building or non-designated heritage asset'. This is more closely aligned with national and local policy.
		The demolition or partial demolition of a listed building or other character buildings worthy of consideration as non-designated heritage assets above or below ground will not be supported
		unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that would demonstrably outweigh any unavoidable loss of the heritage asset's significance, will not be supported.
		Proposals for the change of use of a building or structure on the national heritage list will be required to demonstrate how the development would contribute to its conservation whilst preserving or enhancing its architectural or historic interest.'
18.	Page 56	The following sentences should be amended to address the renumbering of appendices:
		The most significant open spaces are detailed in Appendix 2 1 and are shown on the Local Green Spaces map in Appendix 2 1.
19.	Page 56	We recommend that the following sentence is amended to provide the most-up-to date information regarding the NPPF:
		They have been assessed against the criteria set out in paragraphs 99-101 101-102 of the NPPF
20.	Page 56-8	Policy CH GP1 – Local Green Space
		There are 16 Local Green Spaces now listed in the policy. However, the supporting text on page 56 paragraph 6.3 refers to 'seven very significant areas' and then on page 57 refers to 'eleven further Local Green Spaces identified as follows'. This would make 18 LGSs, when there are only 16 noted. Additionally, of the 'eleven further Local Green Spaces identified' in paragraph 6.4, many do not match the names of LGSs listed in the Policy itself. We recommend checking these and ensuring naming consistency between the policy, supporting text and Appendix 1; and, once this is corrected, then correcting the numbers stated in the supporting text so that they total 16.

		As an example, LGS 4 is named Old Kiln Lakes in the policy, but also named the Quarry Site in the supporting text. These will need to be consistent, for clarity.
21.	Page 57	We recommend the following amendment to ensure consistency with the rest of the paragraph, which refers to the seven most 'significant' LGSs:
		The small village of Henton, which is within the parish of Chinnor, includes a registered village green (the sixth area), which is an integral part of the village character providing an informal open space at the north end of the village.
22.	Page 72	Our GIS officer highlighted that updated GIS layers appear to show that LGS 14 is overlapping with private gardens. We therefore recommend amending this LGS to avoid the private gardens if possible.
		Regarding the smaller section of LGS 14 off Oak End Way, this no longer appears to be a publicly accessible green space and therefore potentially does not meet the NPPF Local Green Space criteria set out in NPPF paragraphs 101-102. We recommend reviewing this space - and if it does not meet the criteria, we recommend removing it. Additionally, there is no reference to this smaller LGS 14 area in Appendix 1, page 116 - and we recommend that, if it is to be retained, a description of it is added.
23.	Page 77	Policy CH GP2 – Protection of Habitats of Significance
		We recommend correcting the typographical errors where the 'n' in 'new' is missing at the start of this policy; and a gap needs to be inserted between the words 'of any' in the first bullet point.
		We recommend the following minor amendment to the newly-added sentences in this policy, to prevent repetition:
		ALL DEVELOPMENT SHOULD RESULT IN A BIODIVERSITY GAIN FOR THE PARISH. ALL DEVELOPMENT PROPOSALS SHOULD RESULT IN A NET BIODIVERSITY GAIN OF AT LEAST 10% FOR THE PARISH, MEASURED BY A RECOGNISED BIODIVERSITY ACCOUNTING METRIC AGAINST A BASELINE ECOLOGICAL SURVEY DETAILING WILDLIFE HABITATS, INCLUDING TREES AND HEDGEROWS, AND THEIR CONDITION.
		We recommend removing the fourth bullet point (below), as due to the overall amendments to this policy it now largely repeats the requirements set out in the second bullet point (above).

		THE BIODIVERSITY OF THE COUNTRYSIDE SHOULD BE PROTECTED AND IMPROVED, WITH A NET BIODIVERSITY GAIN OF AT LEAST 10% (AS OUTLINED ABOVE) IN NEW DEVELOPMENT OUTSIDE THE CHINNOR DEVELOPMENT BOUNDARY AS DEFINED IN POLICY CH H7.
24.	Page 78	Policy CH GP3 – Public Rights of Way
		We recommend the following typographical amendment to this policy:
		DEVELOPMENT SHOULD PROTECT EXISTING THE EXISTING PROW NETWORK AND ITS AMBIANCE.
		Our Climate Team commented that you could try to take this policy further, to push for enhancements of existing and the creation of new public rights of way – this will make it easier for residents to walk or cycle round the village which is an important part of the behaviour change needed to reduce carbon emissions, as is recognised in the green living section of the plan. They highlighted that the <u>draft Thame Neighbourhood Plan</u> which has just been consulted on, for example, has an excellent focus on encouraging walking and cycling.
25.	Page 81	Policy CH CF1 - The Protection of Community Facilities
		We recommend re-inserting the paragraph space between the words 'or' and 'It' as set out in the 2021 Chinnor Neighbourhood Plan, for clarity and ease of reading.
26.	General	Our Equalities Officer asked that accessibility to all is considered; for example:
		 though allotments are mentioned, they recommended adding a plan for raised beds for gardeners with mobility issues;
		 though open spaces and picnic areas are mentioned, they recommended trying to ensure there is at least one accessible picnic bench;
		 though recreation grounds are mentioned, they recommended planning for some play equipment to be accessible.
27.	Page 83	For all the new, additional facilities listed in this policy, please could we have confirmation that you have contacted the landowners, to inform them that you wish to include their land/property as a community facility?
28.	Page 87	The Retail Areas map appears quite blurred. We recommend providing an enhanced map, for clarity, so that users can clearly identify the locations of each retail area.
29.	Page 92	Policy CH T1 - Enhancement of Tourism Facilities

	We recommend inserting punctuation as follows:
	() THE PROPOSAL PROVIDES ADEQUATE ON-PLOT PARKING
Page 105	We recommend the following amendment, for clarity:
	Their later response <mark>,</mark> dated 4 December 2019 <mark>,</mark> follow ed ing a meeting with the Parish Council on 3 December 2019 and amended their earlier comments as follows:
Page 106	We recommend the following amendments, for clarity:
	10.17It was thought that the treatment works were of limited capacity and was were only able to handle the waste from the Kiln Lakes development ()
	10.18 Furthermore tThere wasis significant concern, particularly in areas of the community (Mill Lane/Estover Way and Henton itself) already affected by the shortcomings in the existing waste water collection and treatment systems. Thames Water's response was: ()
	We also recommend adding a full stop at the end of 10.18.
Page 111-117	Community facilities: the hectarage figure is missing for a number of the facilities – we recommend adding these for clarity.
Page 121	We note the aspirational cycle routes map has been removed from the plan review draft. We recommend reinserting this, for clarity. However, we recommend ensuring that the map is high-quality as it was previously quite blurred.
Page 123-6	There is no link to the Joint Design Guide 2022; we recommend inserting this for consistency with the other document references on this page.
	The link to the Chilterns Buildings Design Guide does not work. Please amend to: https://www.chilternsaonb.org/wp-content/uploads/2022/09/CBDGChilternsBuildingsDesignGuide2010.pdf
	Paragraphs on these pages that make reference to the South Oxfordshire Design Guide and its chapters will need to be updated to make reference to the South Oxfordshire and Vale of White Horse Joint Design Guide.
	Page 106 Page 111-117 Page 121

35.	Page 125	These paragraphs will need to be amended as the font appears to have uploaded incorrectly in the highlighted sections: • Bricks of an appropriate colour for the area, usually shades of orange/red and terracotta with limited use of grey for contrast. The texture of bricks should match those typical of the area. Ideally, they should be handmade or appropriately machine textured. The use of Aint together with brick is appropriate in the Chilterns area and will promote integration with existing building in Chinnor. • Plain red clay tiles or natural slate roofs (often with clay ridge tiles) are the predominant roo;ng materials in most locations.
36.	Page 135	The weblink to the Chinnor Plan website does not work – please prove an updated link.
Typogra	phical/Presenta	ational Amendment Recommendations
37.	Page 5	Amend Northwest to north-west; Southeast to south-east; and Northeast to north-east.
38.	Page 5	The map on this page is very blurred. We recommend enhancing or replacing this, for clarity.
39.	Page 6	Add plural as follows: since 2011 there have been 1003 dwelling s approved with planning permission
40.	Page 7	There appears to be a missing closed bracket in the first paragraph on this page. Amend as follows: (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 74)';
41.	Page 7	Insert commas as follows, for clarity: work through their local Parish Council to identify, for example, where they think
42.	Page 13	Amend as follows, for clarity: making it an SSSI for fossils in the understanding of geological history
43.	Page 21	The graph overlaps the supporting text – we recommend re-aligning this page.

Page 22	The weblink to the 2022 JSNA does not work – we recommend amending this, and the reference, to the updated 2023 JSNA page: https://insight.oxfordshire.gov.uk/cms/joint-strategic-needs-assessment
Page 25	Amend as follows, for clarity:
	(Taken from OCC Single County Response <mark>,</mark> Application no: P22/S4643/O <mark>.</mark> Location: Land west of Thame Road <mark>,</mark> Chinnor. Officer's Title: Access to Learning Information Analyst - 23/01/23)
Page 26	Amend as follows:
	(Taken from OCC Single County Response, Application no: P22/S4643/O, Location: Land west of Thame Road, Chinnor. Officer's Title: Access to Learning Information Analyst - 23/01/23).
Page 47	Add space as follows:
	CSR <mark>1 a</mark> nd in
Page 57	There is a typographical error where a sentence in paragraph 6.3 runs to a new paragraph in the middle of the
	sentence, after the word 'village'. Please remove the paragraph space.
Page 79	Add punctuation as follows:
	6.15 In a similar fashion <mark>,</mark> the Plan supports and encourages
Page 80	Add punctuation as follows:
	7.4 Where planning permission is sought for a change of use that will result in the loss of a community facility, it will be necessary to demonstrate that there is no reasonable prospect of securing its continued use.
Page 86	Paragraph 8.8. – re-align the sentences in this section.
	Insert punctuation as follows:
	Paragraph 8.9
	The Plan sets out a policy <mark>-</mark> based approach
	Deregraph 9.10
	Paragraph 8.10 Whilet there are pockets of ecceptial individual or small groups of shape throughout the Plan group the
	Whilst there are pockets of essential individual or small groups of shops throughout the Plan area, the principal concentrations of retail units are in the area of
	Page 25 Page 26 Page 47 Page 57 Page 79 Page 80

		Paragraph 8.11
		The policy <mark>-</mark> led approach
52.	Page 87	Amend typographical errors as follows:
		by reference to existing and current rental figures with <mark>in</mark> Chinnor
		encouraged to help redress the current shortfall in essential facilities: Bank or building society; an additional mini supermarket, similar in size to the existing Coop; and particularly the expansion of health surgery and/or pharmacy capacity within the Village.
53.	Page 89	Insert punctuation as follows:
		8.18 Existing businesses are currently spread throughout the Village, with most being located, except for most of the retail space, in secondary locations. The larger employment facilities that we have lost include the Chinnor Cement Works and other businesses that employed a wide range of skill sets, thus giving a wide selection of employment opportunities. In this context, the Plan sets out to encourage a range of employment activities appropriate to Chinnor, and with a diverse population.
54.	Page 91	Insert punctuation as follows:
		8.20 Noted examples of the existing tourism and heritage facilities include the Chinnor and Princes Risborough Steam Railway, .—Tthe Windmill on Mill Lane, the lakes area from the site of the old Chinnor Cement Works, the proximity to the Chilterns Area of Outstanding Natural Beauty and the success of the Red Kites, that are now established in our skies.
		8.21 () Where appropriate, proposals should show how they meet the requirements of the other policies on transport and parking.
55.	Page 95	Insert punctuation as follows:
		This issue is discussed further in Section 10 - Actions for Chinnor Parish Council, paragraphs 10.3 and 10.4.
56.	Page 96-7	Insert punctuation as follows:
		 10.3 During the course of the consultation process on the Pre-Submission Version of the Neighbourhood Plan, issues arose concerning: The ability of the schools to grow and provide for the additional children from the new family homes, both in Chinnor and the surrounding villages. The ability of the schools to respond both to rising local demand and to the rising birth rate.

		 The poor quality and deterioration of school buildings. The need to provide additional Pre-School facilities: Pre-Schools have to address the Government initiative to increase the Pre-School hours from 15 to 30 hours per week. These are still continuing issues and areas of concern which are also subject to changing Government policy (such as grant funding from the age of one).
57.	Page 97	Insert punctuation as follows:
		10.6 It is anticipated that during the life of this Plan, the new developments in Chinnor and more significantly, the major developments to the East of Chinnor in and around Princes Risborough, and in other locations in Buckinghamshire and the construction work on HS2, will create an inevitable growth in local traffic trying to access the M40 via the B4009 through Chinnor. (Remove paragraph space here). The full impact of this growth over time has not yet been measured as
58.	Page 98	The strikethrough wording is still present on this page – remove as follows:
		It will need further future of traffic surveys to establish the full effect.
59.	Page 98	Realign the last bullet point in Action Point 2 and insert punctuation as follows:
		Assist in developing the strategy for a relief road around the Village of Chinnor, should the need become apparent and justifiable. () 10.9 Whilst it is not a part of this Plan and recognising the longer-term strategic relevance of such a decision, the Parish Council will assist in developing the strategy for a relief road around the village of Chinnor, should the need become apparent and justifiable
60.	Action Points (general)	There appears to be inconsistency in the action points, where some sentences/bullets end in full stops and others do not. We recommend inserting full stops at the end of all sentences for consistency.
61.	Page 99	The sentences below are unclear and require updating; for example, is the working group providing an ongoing resource? We recommend re-phrasing the sentences to address what is happening in the present, for clarity.
		The working group that operated as a task group during preparation of the Neighbourhood Plan would provide an ongoing resource to the Parish Council. Taking this measure would create an informed

62.	Page 103	core of a working group of interested parties should it be deemed desirable to re-establish the task group to follow up these issues. Point 2 of Action Point 3 confirms 'these have now been installed'. We recommend removing point 2 from the list, as it has been achieved, and inserting it at the end of the action point, where it can be introduced via a sentence stating 'the following action point has been achieved'. We recommend adding bullet points to the list on this page, to make the items clearer.
		Correct paragraph reference as follows: The following projects (and as identified in paragraph 10. 14 13 of this Plan)
63.	Page 104	 We recommend the following amendments to ensure consistency with the rest of the list: () Reviewing and revising vehicular access to the villages in the Plan area Reviewing, improveing and establishing a series of inter-connected pedestrian and cycling corridors enabling the community to travel, cycle, walk or wheelchair to all village amenities, including the Phoenix Trail
64.	Page 107	Remove double space between 'Chinnor' and 'Cuttle' in paragraph 10.21.
65.	Page 110	Insert comma as follows: Action Point 8 The Parish Council will continue to work with Thames Water to ensure that appropriate foul and surface water improvements are implemented throughout the Plan period, both to remedy existing circumstances and to make appropriate provision of new housing developments during the life of the Plan
66.	Page 113	Correct typographical error: Recently planted with over 60 establishesd trees by local residents.
67.	Page 115	Item 9 – add a full stop after 'Council'.

68.	Page 120	Insert the following amendments to provide further clarity:
		The a Access to Thame as the nearest town for schools, shopping and employment, and Princes Risborough and Lewknor for rail and bus links, would all benefit from the addition of suitable cycle paths.
69.	Page 121	Insert the following punctuation for further clarity:
		()These would be clearly marked and well-maintained footpaths and road crossings, plus an on-road cycling space to create a two-way pedestrian and cycle corridor: ()
		Improved access to Princes Risborough, Lewknor , and Stoke Mandeville among others have has been requested.
70.	Page 127	Amend as follows:
		Photographs were also taken in some instance <mark>s</mark> as evidence. These are listed below…
		Please check whether this sentence should state 'orchids'; or should it be 'orchards':
		TH6 Two areas of trees and orchids
71.	Appendix 6	The 'attendance statistics' sections in this appendix are not aligned. We recommend correcting these, for ease of reading and visual improvement.
72.	Page 139	Amend as follows: access hospitals at Stoke Mandeville, hHigh Wycombe and Thame