

# Response 1: Historic England



Historic England

Sir/Madam  
South and Vale District Councils

Direct Dial: -

Our ref: [REDACTED]  
29 September 2023

Dear Sir/Madam

**Ref: Chinnor Neighbourhood Plan Regulation 16 Consultation**

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

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

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

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

Yours sincerely,

[REDACTED]

Historic Places Adviser - London and South East  
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*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

# Response 2: Natural England

Date: 03 October 2023  
Our ref: [REDACTED]



Planning.Policy@southandvale.gov.uk

**BY EMAIL ONLY**

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Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear [REDACTED]

## **Chinnor Neighbourhood Development Plan Review II**

Thank you for your consultation on the above dated 13 September 2023 which was received by Natural England on the same date.

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

### **Proposed Extension of Chilterns Area of Outstanding Natural Beauty**

The plan area is within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, paragraph 174 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside. Natural England advises that this area should be considered as a valued landscape with appropriate Local Plan policies to protect and enhance its intrinsic character and natural beauty. Furthermore, Paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation Order by Natural England but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight in plan-making and as a material consideration in planning decisions.

### **Additional Information**

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental



assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

  
Sustainable Development Lead Adviser  
Thames Solent Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**.

Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.localrecordscentres.org.uk/).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

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<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

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<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

# Response 3: South Oxfordshire District Council

Policy and Programmes

**HEAD OF SERVICE: TIM ORUYE**



Listening Learning Leading

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19 October 2023

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

South Oxfordshire District Council has worked to support Chinnor Parish Council in the preparation of their Neighbourhood Plan Review II and compliments them on a thoughtful, comprehensive and well-produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the Chinnor Neighbourhood Development Plan (NDP) Review II during the pre-submission consultation.

We are committed to helping this plan review succeed. To achieve this, we offer constructive comments on issues that 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.

Yours faithfully

[REDACTED]

[REDACTED]

**Senior Planning Policy Officer (Neighbourhood Planning)**

Ref.	Section/Policy	Comment/Recommendation
1.	Page 5	As highlighted in our Regulation 14 comments, the map on this page is very blurred. We continue to recommend enhancing or replacing this, for clarity. The council have included an amended map at <b>Appendix 1</b> (at the end of this response) that would address this issue.
2.	Page 6	<p>We recommend the following amendments, to provide the most up to date information available from South Oxfordshire District Council:</p> <p>1.6 As of March 2023, from SODC data, since 2011 there have been <del>4003</del> <b>1002</b> dwellings approved with planning permission within the Parish of Chinnor, of which 866 have been completed. Of these, 483 are from Neighbourhood Plan allocated sites, of which 440 have been completed. Further information can be found in Section 4.25.</p>
3.	Page 7	<p>We recommend the following amendment to ensure precise quotation of the NPPF:</p> <p>...that the local planning authority ‘has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer; as set out in paragraph 74)’; and ‘the local planning authority’s housing delivery was at least 45% of that required over the previous three years’.</p>
4.	Page 9	<p>We recommend the following amendment, because if adopted the Review II plan will cover less than a fifteen-year period:</p> <p>1.17 The Neighbourhood Plan will cover <del>a 15-year</del> <b>the</b> period to 2035.</p>
5.	Page 14	<p>We recommend the following amendment, for precision and to provide the most up-to-date information. This is because paragraph 2.10 provides updated data, so 2.9 can consequently be shortened:</p> <p>2.9 The population of Chinnor Parish has grown from being the fourth largest Parish in the former Bullingdon District in 1961 to become the largest parish in South Oxfordshire district in 2011. <del>It is expected that ONS Census data for 2021 will show a continued growth in line with the number of new residents and building developments.</del></p>

		2.10 The population of Chinnor was 5,924 in 2011. ONS Census data for 2021 shows an increase to 7600 which itself is a number that will have increased further due to occupation of new build housing since the date of the 2021 Census.
6.	Page 17	We recommend the following amendment to provide the most up-to-date information available from South Oxfordshire District Council:  4003 <del>1002</del> dwellings were permitted in total.
7.	Page 18 2.20	We recommend that the following factual and typographical errors are amended as follows, for clarity and to provide the most up to date information:  Rented accommodation <del>rose from</del> has risen from 139 during 2011 to 260 by 2014 <b>2021</b> . Latest 2014 Census data shows a significant increase with social rented accommodation <del>edion</del> now being 10.9% of the total and private rented <b>accommodation</b> now at 8.6%.
8.	Page 19	As highlighted in our Regulation 14 comments, we recommended that pages 19-21 were updated using the ONS data from the 2021 Census. We can see that largely this has been addressed, which is commended. However, paragraph 2.21 and its accompanying figure still appear to be based on 2011 data. As paragraph 2.20 provides sufficient updated data regarding social rented and private rented housing, we recommend paragraph 2.21 and its figure are now deleted.
9.	Page 20	We recommend the following amendments, to provide sufficient clarity:  Using the 2021 Census data the working age population of 3889 during 2021 <del>is</del> <b>was</b> 50.7% of the population of 7644 residents which is <b>a</b> drastic <b>percentage</b> reduction <del>as a percentage</del> from the 72% of 2011.
10.	Page 21	We recommend the following amendments to provide sufficient clarity and remove ambiguity:  ...513 (16.6%) of households have 3 or more cars. Therefore, at a very minimum of 5,272 cars exist., <del>however those above and at 3 are unknown</del>
11.	Page 27	We recommend removing the strikethrough in this sentence, for clarity:



		<p>3.1 The preparation of the original Neighbourhood Plan has sought to address a wide range of overlapping issues which have been addressed in Section 2 of this plan. An initial vision and a series of objectives were</p>
12.	Page 37	<p>We recommend the following minor update to provide the most up to date, accurate information:</p> <p>Chinnor Parish is required under the adopted Local Plan 2035 to provide for 15% housing growth in the plan to <del>2034</del> <b>2035</b>.</p>
13.	Page 40 4.14	<p>Our Affordable Housing team suggested that the following sentence is amended, for further clarity, to reflect that there is also a district-wide need for affordable housing.</p> <p>The need remains <b>(both parish and district-wide)</b> for affordable housing for rent and shared ownership...</p>
14.	Page 42	<p>Paragraph 4.17 refers to data from the 2011 census, however age profile data is now <a href="#">available from the 2021 Census</a>. We recommend that the figures set out here are amended to provide the latest information as follows:</p> <p>4.17 Demographic changes indicate that there is an increasing need for housing provision for the elderly in Chinnor. <b>The 2021 Census showed that 20.5% of Chinnor's residents are now aged 65 and over.</b> <del>Between 2001 and 2011 the number of residents in Chinnor aged 65 and over doubled.</del></p>
15.	Page 44-5	<p>We recommend the following minor amendments to provide the most up-to-date information, as the commitments were reduced by one dwelling:</p> <p>As of 31 March 2023, there were 866 completions and <del>437</del> <b>136</b> remaining commitments<sup>4</sup>.</p> <p>Footnote 4: <del>Draft as at May 2023</del> <b>South Oxfordshire Housing Land Supply figures 2023</b></p>

		...In addition, as stated above, they have already been consented as housing development sites and <del>may were</del> therefore <del>be</del> considered deliverable.
16.	Page 46 Policy CH H6	<p>We recommend that the number of homes allocated is updated in Policy CH H6 – Site Allocation, to provide the most up to date information in relation to the reserved matters planning application for this site <a href="#">P19/S4178/RM</a></p> <p>Number of dwellings: 140 <b>116</b></p>
17.	Page 46 and 50	<p>As highlighted in our Regulation 14 comments, we continue to recommend that Figures 1 and 2 are updated, to add a new key, with ‘allocations complete’ remaining in blue and ‘housing allocation’ recoloured purple, for example, to provide clarity and precision. Additionally, with regards to Page 50, the red line of the settlement boundary is drawn broadly and in some instances does not follow the built up area.</p> <p>The council have included amended maps at <b>Appendix 2a and 2b</b> (at the end of this response) that would address these issues.</p>
18.	Page 47-48	<p>We recommend the following minor amendments to provide the most up-to-date information:</p> <p>5 National Planning Policy Framework, <del>77</del> <b>79</b>  6 National Planning Policy Framework, <del>79</del> <b>80</b> sets out which circumstances are relevant.  7 National Planning Policy Framework, <del>84</del> <b>85</b>.</p>
19.	Page 56	<p>We recommend the following amendment to provide up-to-date information:</p> <p>6.3 The <b>existing and</b> proposed local green spaces vary significantly in their size and function.</p> <p>For LGS 2, the policy description is ‘2 - Playing fields to the East of Station Road’. We recommend that the supporting text is therefore amended to match the policy, using a plural, for clarity and to provide the most up to date information, as follows:</p> <p>The second <del>is</del> <b>are</b> the Playing Fields to the east of Station Road. <del>This is</del> <b>These are</b> extensively used as formal playing fields</p>
20.	Page 57	For LGS 13, the supporting text refers to it as:

		<p>Donkey Lane Orchard at the junction of Donkey Lane and the Ridgeway Path</p> <p>However, the Policy and Appendix description of it differs:</p> <p>Old Orchard at the junction of Donkey Lane and the railway line</p> <p>We recommend the supporting text is amended to match the policy and appendix, for clarity, to ensure the policy is applied consistently and to provide the most up to date information. We also recommend the following amendments to Page 57 to again match the policy wording, for clarity and to ensure consistency:</p> <p>St Andrew's Road play area, two open spaces within Van Diemens Close (covered by one designation), Hayley Croft open green, Estover Way open green, Estover Way <b>balancing</b> pond and wildlife area, land behind Greenwood Avenue, Greenwood Meadow Open Greens, <b>Old Orchard at the junction of Donkey Lane and the railway line</b> <del>Donkey Lane Orchard at the junction of Donkey Lane and the Ridgeway Path, Keens Lane Memorial Garden</del> <b>(at Keens Lane where it meets The Avenue)</b> and Mill Lane Community Garden.</p>
21.	Page 73	<p>As set out in our Regulation 14 comments, 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; to ensure it continues to meet the NPPF Local Green Space criteria set out in paragraph 102. The council have included an amended map at <b>Appendix 3</b> (at the end of this response) that would address this issue.</p>
22.	Page 83 Policy CH CF1 - The Protection of Community Facilities	<p>To ensure this policy is clear, we recommend setting out each community facility on a new line, to ensure that users can apply the policy consistently and with confidence. We therefore recommend the following policy amendments:</p> <p>14 The Red Lion, <b>(add paragraph space)</b> 15 The Crown, <b>(add paragraph space)</b> 16 Wheatsheaf public houses in Chinnor <b>(add paragraph space)</b>  17 The Charles Napier restaurant on Chinnor Hill  18 Cob Cottage Cafe on Station Road</p>

		19 The Library off sStation rRoad
23.	Page 87-88	<p>We recommend the following amendments to paragraph 8.12 and its footnote, to ensure they provide the most up-to-date information for users and decision-makers regarding new Use Classes:</p> <p>8.12 For clarity, “retail use” includes all the following use designations: <b>A1-E(a) Shops (display or retail sale of goods)</b>, <b>A2 Financial and professional services</b>, <b>A3-E(b) and Sui Generis Restaurants and cafés</b>, <b>E(ci and cii) Financial and professional services</b>, <b>A4 Sui Generis Drinking establishments</b> and <b>A5-Hot food takeaways</b><sup>8</sup>. In seeking to establish that there is “no reasonable prospect of securing an alternative retail use” the applicant will need to demonstrate that the property has been advertised on the open market for non-restricted retail use for at least twelve months at a fair market leasehold value established by reference to existing and current rental figures within Chinnor.</p> <p><sup>8</sup> It is noted that these designations may have changed since this was last updated—<b>Please see <a href="https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes">https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes</a> for more information regarding current Use Classes. The uses mentioned and the above can now be are</b> covered by E(a), E(b), E(c) and certain aspects of “Sui generis”.</p>
24.	Page 88	As we highlighted in our Regulation 14 comments, the Retail Areas map appears quite blurred, which will be difficult to read for users with visual difficulties. We recommend that an enhanced and updated map is provided, for clarity, so that users can clearly identify the locations of each retail area. The council have included an amended map at <b>Appendix 4</b> (at the end of this response) that would address this issue.
25.	Page 98	<p>We recommend that the following supporting text is updated for consistency with the newly-proposed Education policy in the plan Review II:</p> <p>10.4 Chinnor Parish Council wishes to support the local schools to enable them to provide the best opportunities for young people <b>and this is reflected in the proposed Policy CH E1: Education Facilities</b> but it has no policies for the school sites in this plan. The Plan cannot propose land use policies at this time to resolve these important</p>

		<del>local issues but it does</del> recognises the urgent need to support the schools and plan for their future.
26.	Page 119	We recommend this map is amended to reflect the most up-to-date information, where the second, smaller LGS 14 area should be removed to match the updated LGS 14 designation map, with only one area of LGS, rather than two. The council have included an amended map at <b>Appendix 5</b> (at the end of this response) that would address this issue.
27.	Page 123	We note that the aspirational cycle routes map has been reinserted following our Regulation 14 comments, which is appreciated. However, as highlighted in our previous comments, we recommended ensuring that the map is high-quality (it remains very blurred). We recommend, for precision and clarity, that this map is replaced with a crisper, high-quality map, to ensure it is as user-friendly as possible. The council have included an amended map at <b>Appendix 6</b> (at the end of this response) that would address this issue.
28.	Page 129	As highlighted in our Regulation 14 response, we continue to recommend checking whether sentence TH6 should state 'orchids'. As this record is part of a tree and hedge specific survey, we recommend this is amended to 'orchards':  TH6 Two areas of trees and <del>orchids</del> <b>orchards</b>
29.	General	We recommend a number of typographical amendments, set out in the table below, to ensure clarity:

Typographical / Presentational Amendments		
30.	Page 5 1.2	As highlighted in our Regulation 14 comments, we recommend amending 'Northwest' to 'north-west', for consistency with the rest of the paragraph.
31.	Page 12	We recommend the following minor amendments, for consistency with the rest of the document:  2.5 ...and provides a route to the <del>Northwest</del> <b>north-west</b> via the M42 and M6  2.6 This team works with <del>the</del> Oxfordshire County Council and the Chiltern Society

32.	Page 23-26	<p>We recommend the following minor typographical amendments:</p> <p>This can peak as high as a 1000 visitors for highly popular events such as the annual village pantomime.</p> <p>2.40 Chinnor is well placed to benefit from the rise in cycling, a popular sport, and recreation with cyclists travelling through the village and using its facilities whilst exploring the Chilterns AONB.</p> <p>2.44 Chinnor has three pre-schools that cater and provide facilities for children from the age of 3 to 5: Ladybirds (roll is 40 that could be increased to 50) based at St Andrew's School; Jack and Jill Pre-School (roll is between 40 and 45) also based at Mill Lane School site; <b>and</b> Windmill Community Nursery is a school nursery class and is part of Mill Lane Community Primary...</p> <p>2.48 A Youth Club is located in the sports pavilion next to the MUGA (Multi-use Games Area) on White's Field and provides a once-weekly meeting for about 25 young people, most of whom are Chinnor residents. Section 9 deals with Education and Young People.</p>
33.	Page 29 Policy and Objectives table	We recommend stating the full name of the policy alongside its number in the table; this allows the table to be as user-friendly as possible.
34.	Page 38	We recommend re-inserting the missing full stop at the end of paragraph 4.10.
35.	Page 39	<p>We recommend the following minor typographical amendment:</p> <p>It also provides an opportunity for sensitive small-scale residential units to contribute towards addressing the specialist housing needs in the Plan area <del>and</del> as set out in paragraph 4.8 of this Plan.</p>
36.	Page 40	<p>We recommend the following minor typographical amendment:</p> <p>There is a need for additional social housing which <del>is</del> currently at a low level...</p>
37.	Page 48	We recommend the following minor typographical amendment:

		ensuring that new development is both sustainable and makes best use of available land <del>an</del> <b>for</b> existing and future services.
38.	Page 53	We recommend removing the erroneous paragraph space in the middle of 5.4, for consistency with the rest of the paragraphs.
39.	Page 77	We recommend the following minor typographical amendment:  6.11 The community has developed a number of circular walks / running spaces with seating around Chinnor and <b>its</b> outskirts
40.	Page 88	We recommend the following minor typographical amendment for consistency with the rest of the document:  an additional mini supermarket, similar in size to the existing Co-op;
41.	Page 90 Policy Ch B1 - Protection of Existing Employment Premises	We recommend removing the erroneous paragraph space in the middle of this policy, for consistency with the rest of the policies.
42.	Page 91	We recommend removing the erroneous paragraph space in the middle of 8.19, for consistency with the rest of the paragraphs.
43.	Page 93	We recommend removing the erroneous '9' sitting next to the policy box on this page.
44.	Page 95	We recommend the following minor typographical amendments:  9.5 There are three pre-school providers: Ladybirds (based at St Andrew's); Jack & Jill and Windmill Community Nursery (both based at Mill Lane) who provide facilities for younger children; <b>and</b> Buds that Blossom (based at Lower Road) is a privately owned Nursery who provide facilities for younger children aged 0-4 years.
45.	Page 99	We recommend inserting punctuation as follows:  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
46.	Page 104	We recommend the following minor typographical amendments:

		<ul style="list-style-type: none"><li>• Establish new, and improve existing, sporting/exercise facilities including: <del>B</del>build a new sports pavilion at Old Kiln Lakes.</li><li>• Secure land for the creation of an orchard, fitness space and car parking.</li><li>• Continue to establish walking, jogging, and cycling routes with appropriate signage and seating.</li><li>• Review, in conjunction with Oxfordshire County Council, vehicular access to the village to include 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 and Ridgeway - the Chinnor Parish Network.</li></ul>					
47.	Page 112	<p>We recommend amending the title/columns of the table on this page so that ‘environmental’ sits on the top row, rather than having the word spread across two lines:</p> <table><tr><th>No</th><th>Name/Location of Green Space</th><th>Local/Community/Environmental Value</th><th>Size</th><th>Proximity</th></tr></table>	No	Name/Location of Green Space	Local/Community/Environmental Value	Size	Proximity
No	Name/Location of Green Space	Local/Community/Environmental Value	Size	Proximity			
48.	Page 117	<p>We recommend the following minor amendment to match the policy and ensure the description accurately reflects the street name:</p> <p>Memorial Garden (Keens Lane where it meets <del>t</del>The Avenue)</p>					
49.	Page 113-14	<p>We recommend the following minor typographical amendments:</p> <p>Potential for additional leisure and outdoor activities (land still owned by developer Taylor Wimpey). Recreation and children’s equipped play area being developed nearby (...) Within White’s Field is the floodlit MUGA (multi-use games area),</p>					
50.	Page 121	<p>We recommend the following minor typographical amendment, to provide a full stop at the end of the section:</p> <ul style="list-style-type: none"><li>• “Pinch points” have been installed at the main entry-ways into the Village.</li></ul>					
51.	Page 125	<p>We recommend the following minor typographical amendments:</p>					

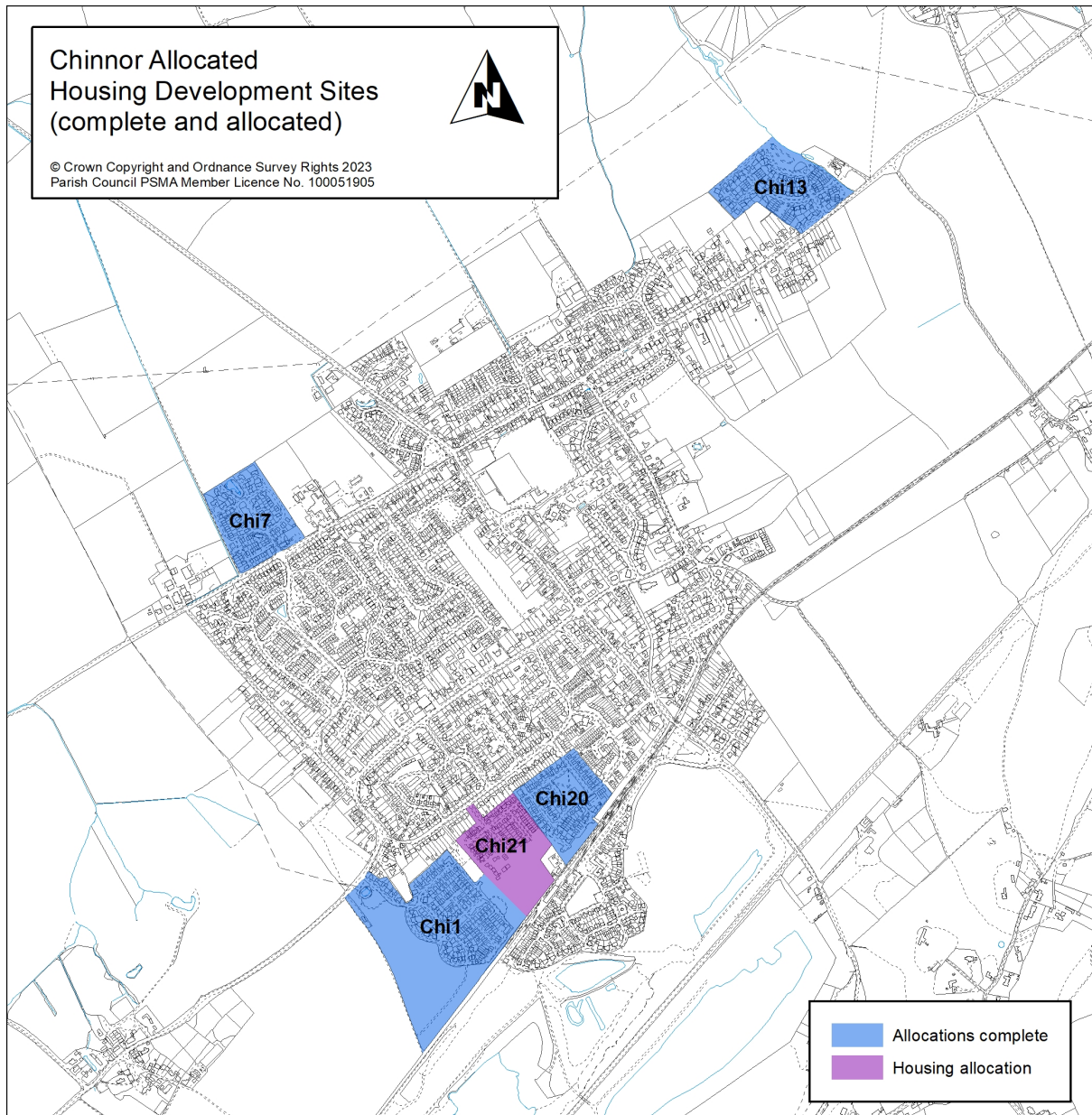


		<p>This is set out in <b>the</b> “Space and Layout” Section of the Joint Design Guide.</p> <p>Three storey dwellings will not be supported; 2.5 storey dwellings will be supported in new developments <b>withi</b>n the Chinnor Village setting provided that they are not grouped together in such a way as to create an overbearing mass.</p>
52.	Page 133	<p>We recommend the following minor typographical amendments:</p> <p>Attendance Statistics</p> <ul style="list-style-type: none"> <li>• Roads represented - 39 out of 85 with an even spread around Chinnor all bar one area (a group of roads in the centre of Chinnor i.e the Mill Lane estate - <del>N</del>no turn out)</li> <li>• Emmington, Wainhill, Chinnor Hill - <del>N</del>no turn out</li> </ul>
53.	Page 134	<p>We recommend re-aligning the table so that the word ‘heritage’ sits on one line, for ease of reading for those with visual difficulties:</p> <div> <p>Conservation/heri tage and design policies</p> </div>
54.	Page 136	<p>We recommend the following minor typographical amendments:</p> <ul style="list-style-type: none"> <li>• Emmington, Wainhill, Chinnor Hill - no turn out</li> </ul>

## Appendix 1 – Page 5 Amended District Map

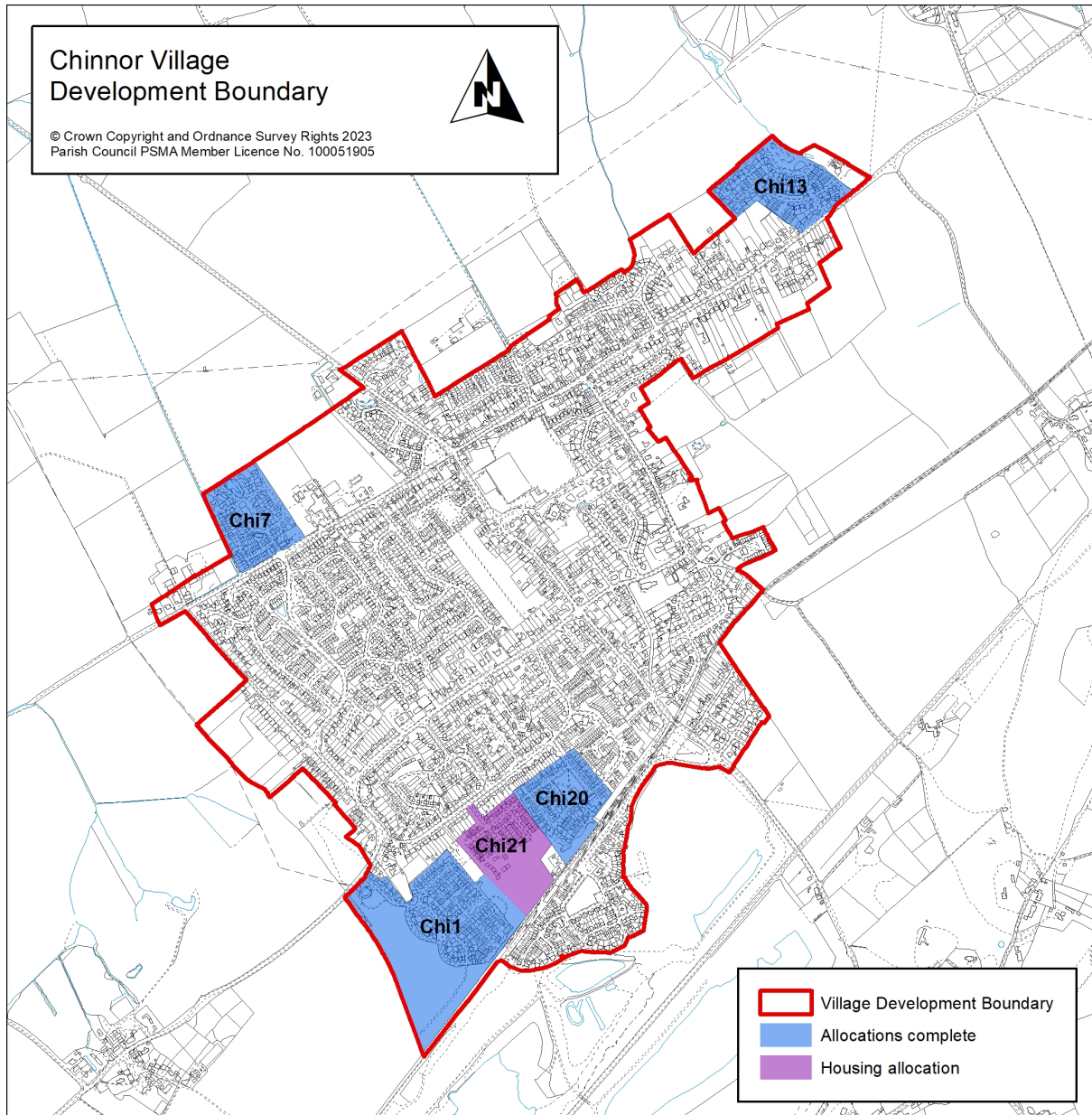


## Appendix 2a – Page 46 Figure 1 - Amended Housing Development Sites (Complete and Allocated) Map

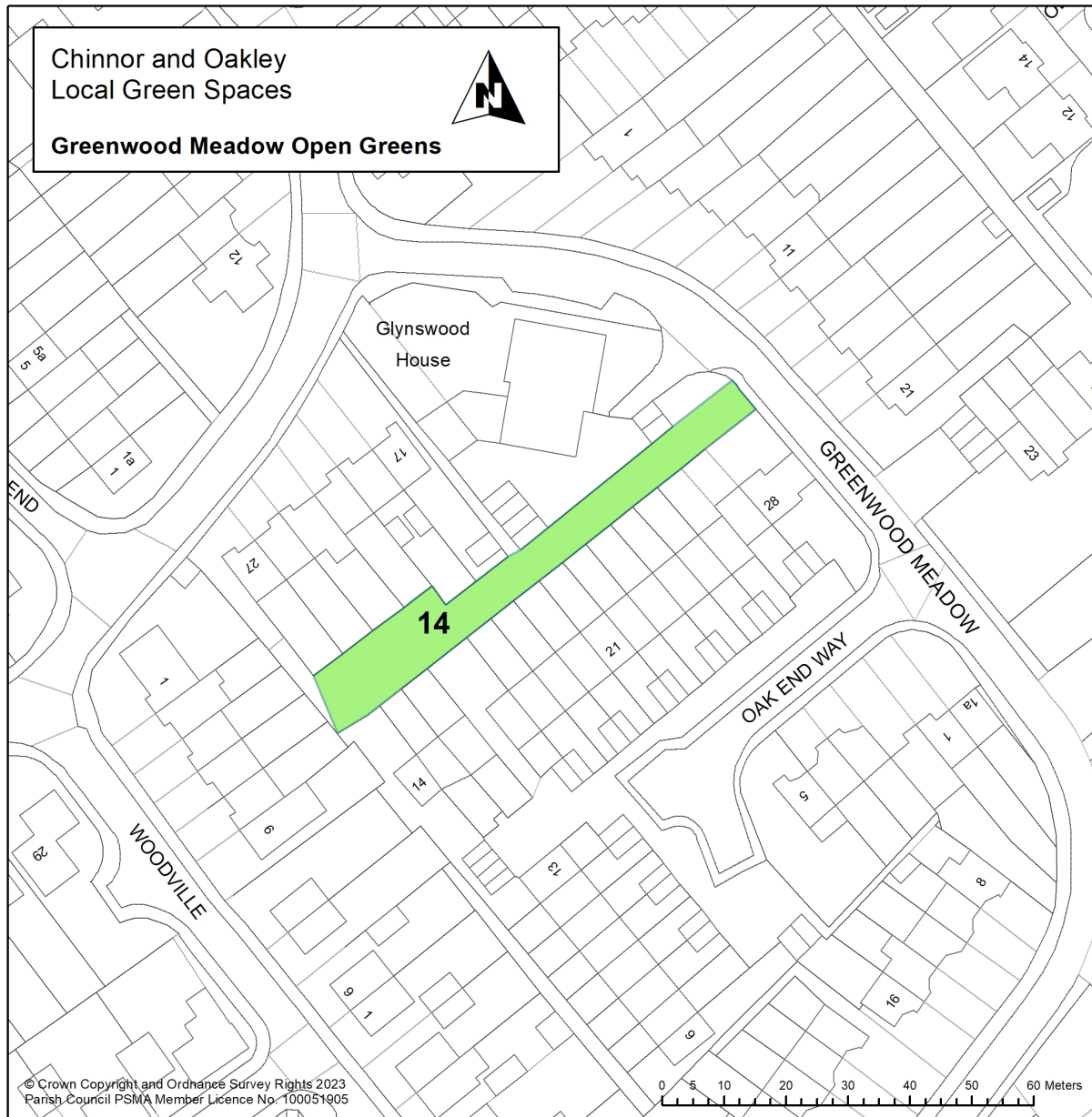




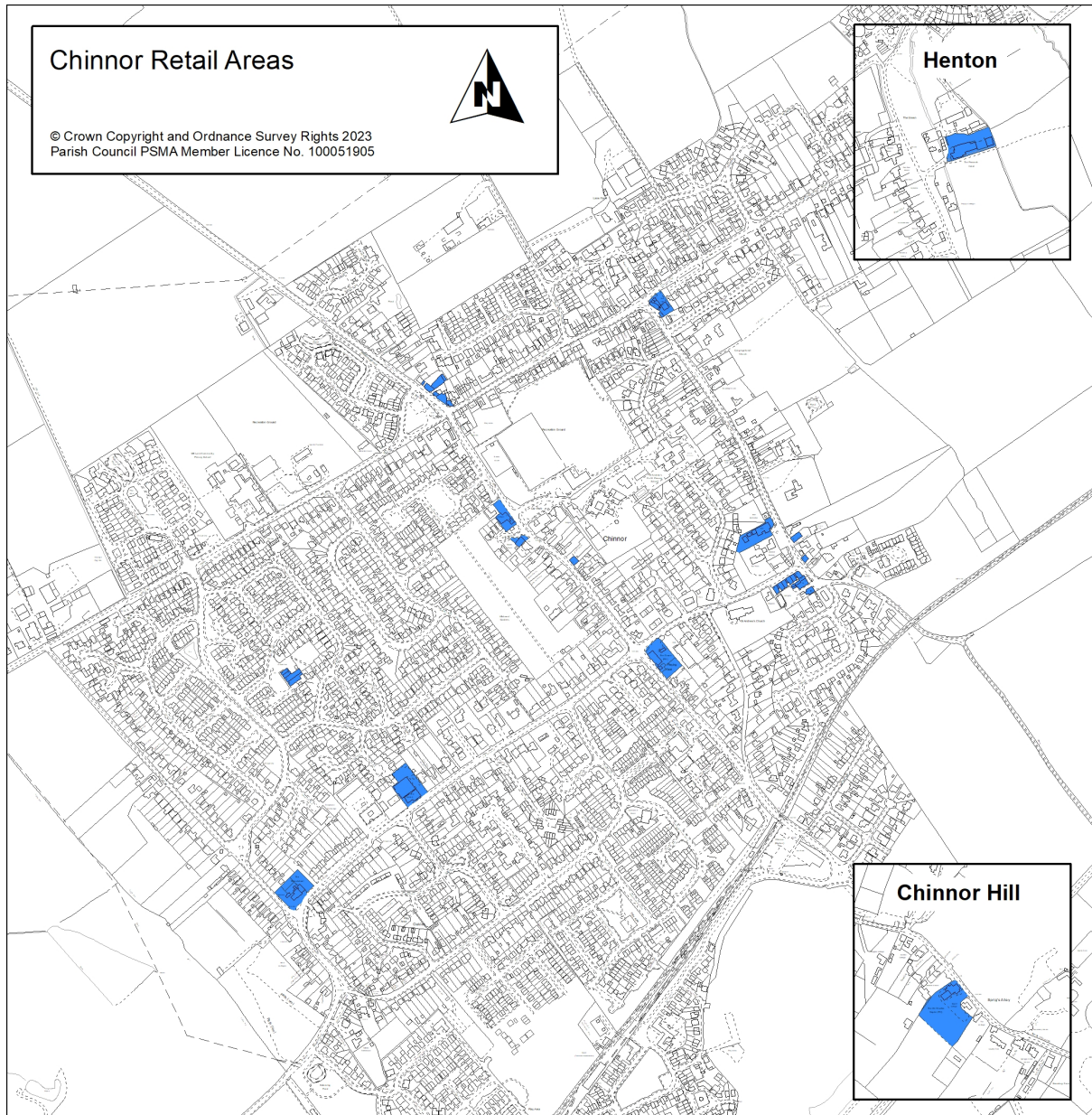
## Appendix 2b – Page 50 Amended Chinnor Village Development Boundary Map



### Appendix 3 – Page 73 Amended LGS Map



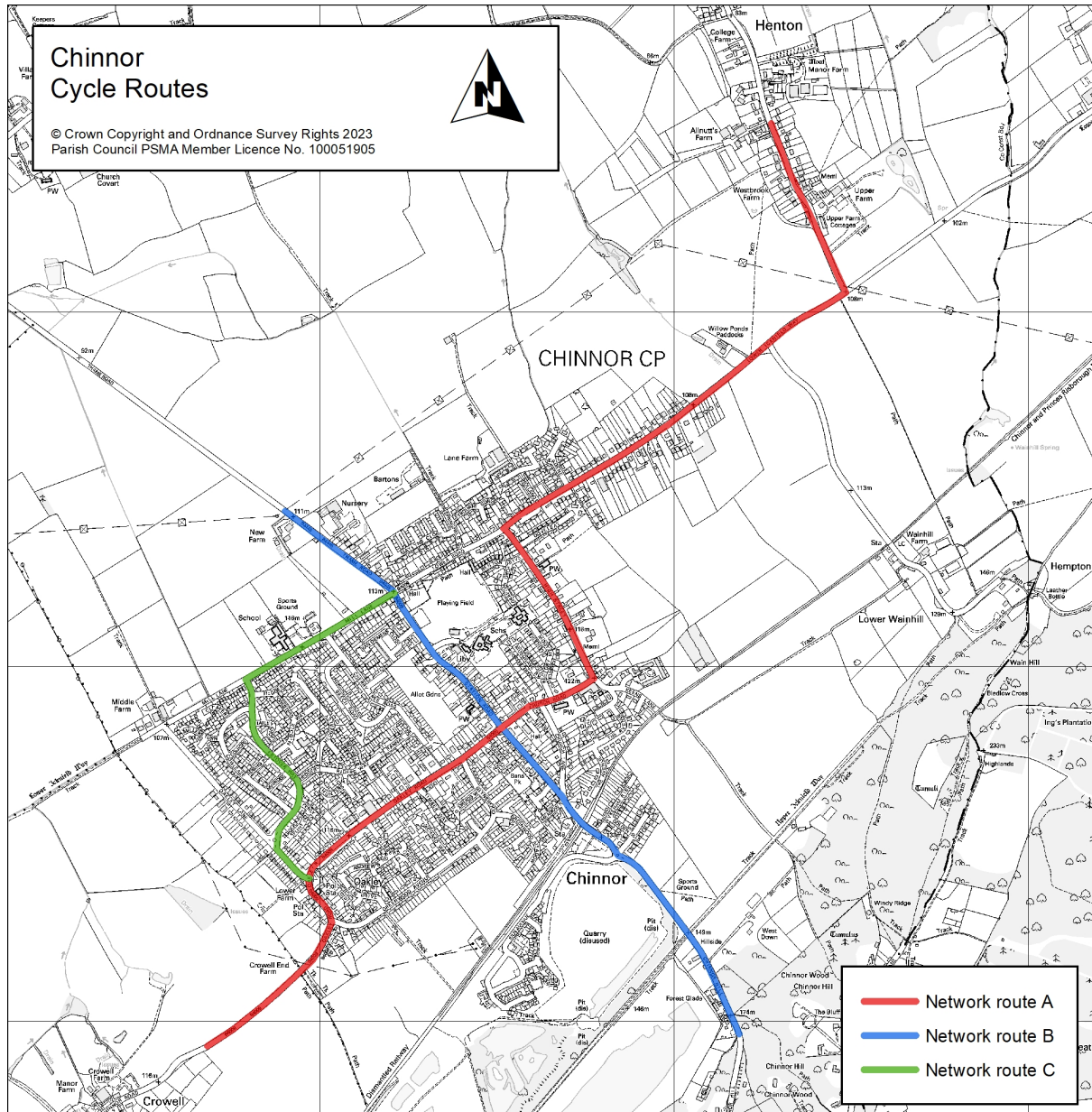
## Appendix 4 – Page 88 Amended Retail Areas Map





[illegible]

## Appendix 6 – Page 123 Amended Cycle Routes Map





# Response 4: Julia Todd

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 19 October 2023 12:47  
**To:** Planning Policy S&V  
**Subject:** Chinnor Plan

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**\*\*EXTERNAL\*\***

---

Good morning

I have downloaded the comment form from the South Oxfordshire website but it is 'READ ONLY' so I can't fill it in so am sending my comments as a direct email to you instead.

Name - Mrs Julia Todd

Address [REDACTED]

Comments

When I moved to Chinnor in 2003 the population was 6000. It had 2 schools and 2 food shops and 2 doctors' surgeries. No old folks homes.

Since then there have been several new large housing developments, which have greatly increased the population - it must be 9000 at least by now. The latest housing development was Greenwood Meadow - 130 'dwellings' ie - at least another 260 people just in one development - before they all start having kids!

There are still only 2 doctors surgeries, 2 schools, 2 food shops. No old folks homes.

How does the government expect the already overstretched facilities to cope? THEY CAN'T - the schools are already refusing entrance as they are full up.

THE VILLAGE CANNOT COPE WITH ANY MORE!!!!!! PLEASE ASK THE 'PLANNERS' TO GET THEIR SUMS RIGHT!

Julia Todd

Sent from [REDACTED]

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This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

---

# Response 5: Thames Water



E: [REDACTED]@thamewater.co.uk  
M: +44 (0) 7747 647031

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

1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB

25 October 2023

## South Oxfordshire District – Chinnor Neighbourhood Plan 2011 to 2035

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

### **Section 10.16 to 10.26 – Thames Water Domestic Waste Treatment**

We generally support this section 5.10 as it is in line with our previous representations, but it should also cover water supply.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

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

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

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

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

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

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

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

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

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we support the section but consider it should equally cover water supply.

## **PROPOSED WATER/WASTEWATER INFRASTRUCTURE TEXT**

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

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

## **Comments in relation to Flood Risk and SUDS**

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

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

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

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

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the

public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

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

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

### **Policy CH H8 - Water Efficiency/Sustainable Design**

We support the policy in principle, but consider that it needs to be strengthened to ensure water efficiency targets are met.

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

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

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

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

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

Paragraph 5.10.5 should be updated as follows:

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

## **Development Sites**

There are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link:  
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

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

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

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

To add further context to the comments under section 10.16 - Thames Water- Domestic Waste Treatment:

Chinnor STW is currently being upgraded. This project will provide a major increase to the current treatment capacity, allowing it to handle and treat 73.8 litres per second which is an increase from 47 litres per second. This increased treatment capacity will also reduce the need for untreated discharges in wet weather. As this project is currently nearing completion, we expect this project to be concluded by the end of 2023.

The Chinnor system continues to be one that has a Groundwater Impacted System Management Plan (GISMP) applied to it. An annual update of what has been witnessed and remedial actions that have been applied will be addressed within the next periodic review of this plan, due at the end of 2023.



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

Yours faithfully,

[REDACTED]  
Thames Water Property Town Planner

# Response 6: Gleeson Land

# Comment Form

## Chinnor Neighbourhood Plan Review II - publicity period

Chinnor Parish Council is working on a Neighbourhood Plan Review II which has recently been submitted to South Oxfordshire District Council. If adopted, the reviewed plan will replace the Chinnor Neighbourhood Plan Review adopted on 20 May 2021.

Please return this comment form by **10am on 26 October 2023** to Planning Policy, South Oxfordshire District Council by post to 'Freepost SOUTH AND VALE CONSULTATIONS' (no other address information or stamp is needed) or email [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)

### **This form has three parts**

**Part A** – Personal Details

**Part B** – Your Comments

**Part C** – Our commitment to equal access for all

### **Next steps**

After the publicity period ends, your responses to Part A and Part B, including your comments, name, email and postal address, will be sent to an independent examiner to consider. The opportunity for further comments at this stage would only be at the specific request of the examiner.

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 in your comments, but the examiner will make the final decision.

Please clearly state in your comments if you wish to be notified of our decision on whether we formally adopt the neighbourhood plan.

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, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement, available alongside this document.

Part C is for monitoring purposes only and all questions are optional. The information provided in this section will not be linked to your submission, shared with the independent examiner or outside the council, nor will it be published as part of the consultation results.

## Part A – Personal Details

---

**1. Are you completing this form as an: (please tick one box)**

- ☐ Individual  
☐ Organisation  
☒ Agent

**2. 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.**

Title	
Name	
Job title (if relevant)	Assistant Planner
Organisation (if relevant)	Turley
Organisation representing (if relevant)	Gleeson Land
Address line 1	The Pinnacle
Address line 2	20 Tudor Road
Address line 3	
Postal town	Reading
Postcode	RG1 1NH
Telephone number	
Email address (where applicable)	@turley.co.uk

## **Part B – Your comments**

---

**3. You can provide your comments on the Chinnor Neighbourhood Plan Review II 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, one of the supporting documents.**

**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, please attach these to your response.**

**4. If appropriate, you can set out below what change(s) you consider necessary to make the plan able to proceed. 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, please attach these to your response.**

Please see accompanying representations.

**5. 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 Chinnor Neighbourhood Plan Review II:**

- ☐ No, I do not request a public examination
- ☒ Yes, I request a public examination
- ☐ Don't know

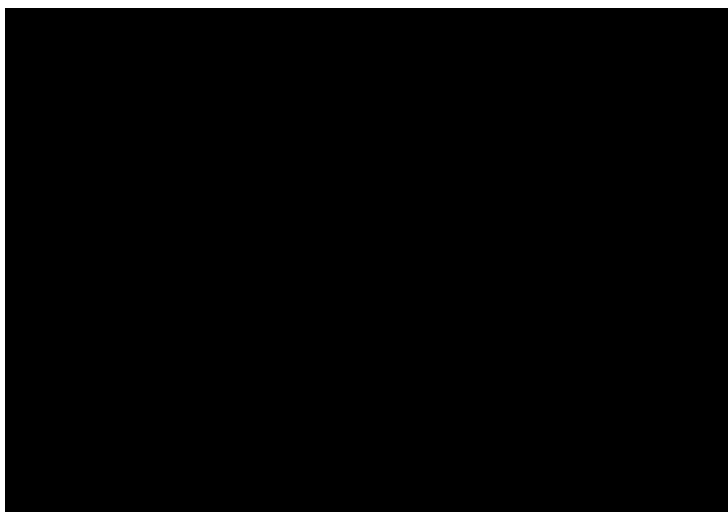
**6. Please state your specific reasons for requesting a public hearing below:**



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



**8. How did you find out about the Chinnor Neighbourhood Plan Review II consultation?**



24<sup>th</sup> October 2023  
Delivered by email

Freepost SOUTH AND VALE CONSULTATIONS  
Planning Policy  
South Oxfordshire District Council

Ref: GLE3005

Dear Sir / Madam,

## CHINNOR NEIGHBOURHOOD PLAN

We write on behalf of our client, Gleeson Land, in respect of the current consultation on the Chinnor Neighbourhood Plan Regulation 16 Consultation Version (September 2023).

Our client has land interests in the Neighbourhood Plan area, in particular Land to the West of Thame Road, Chinnor which is the subject of a live appeal following refusal of outline planning permission for 150 dwellings (P22/S4643/O). The Council cannot currently demonstrate a five year housing land supply.

Our comments and/or objections are set out below and are in the order in which they appear in the Neighbourhood Plan. These have regard to our previous representations submitted to Chinnor Parish Council on 1<sup>st</sup> September 2023 in respect to the Regulation 14 Pre-Submission Version of the Plan.

### Modification Statement

The National Planning Guidance<sup>1</sup> sets out that there are three types of modifications which can be made to a neighbourhood plan. These include:

- **Minor (non-material) modifications** to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum;
- **Material modifications which do not change the nature of the plan** or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan; and
- **Material modifications which do change the nature of the plan** or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

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<sup>1</sup> NPPG Neighbourhood Planning Paragraph 106 (Reference ID: 41-106-20190509)

The Pinnacle  
20 Tudor Road  
Reading  
RG1 1NH

T 0118 902 2830 [turley.co.uk](http://turley.co.uk)



The Modification Statement produced by the Steering Group for the consultation states that the modifications to the Neighbourhood Plan are material but do not change the nature of the plan. The significance of this is that if the modifications are material then the plan requires examination, but if they do not change the nature of the plan it does not require referendum. It is for the Examiner to make that judgment, not the Steering Group.

A review of the Regulation 16 Consultation Version reveals that the most significant modifications relate to the introduction of a requirement for a Biodiversity Net Gain of 10%, the addition of references to four new community facilities, and the introduction of a policy around the provision of a new school / expansion of the existing; the latter of which has resulted in the introduction of a new policy. In addition to this, there have also been a number of smaller modifications to some of the policies which remained from the made Chinnor NDP Review (2021).

We therefore consider that the combined effect of the modifications is to significantly change the nature of the made Chinnor NDP Review (2021), and consequently that the draft plan should undergo both independent examination and a local referendum.

Similarly, in order for the draft Plan to deliver a vision that reflects the consent of the local people, a local referendum should be undertaken. The last review of the Plan showcased a turnout of 2,111 individuals voting in the referendum as set out in the Final Decision Statement at paragraph 3.7 indicating that there is a clear level of interest in the plan making process to warrant referendum.

Notwithstanding the above, in light of the recent information which has come to light on the potential foul water drainage solution proposed by the Chinnor Parish Council, it is considered progress of the Neighbourhood Plan should be paused to allow this matter to be adequately investigated. This is so as to ensure the policies of the draft Neighbourhood Plan do not prejudice the delivery of a solution, should it exist, given the importance of the foul water issue in the Parish.

## **Policy CH H6 – Site Allocations**

Whilst we note the policy text has been updated so that only a single site (land south of Greenwood Avenue, Chi21) is now proposed for allocation, this has not been reflected in the supporting text to Figure 1 which continues to state “*Key: sites in blue are identified for allocation and referred to in Policy CH H6.*” We would note that planning permission for the development of the Chi21 site was allowed on appeal on 24<sup>th</sup> December 2018 (APP/Q3115/W/17/3187058 and APP/Q3115/W/17/3187059) and is currently under construction. It is not considered therefore that this constitutes an ‘allocation’ and is simply confirmation of sites already consented and should be moved to the proceeding table accordingly. It is clear therefore that the Neighbourhood Plan does not propose any site allocations.

We note that the Regulation 16 version of the Plan has been updated since the Regulation 14 version to reflect the comments from both ourselves and the District Council to reflect that the majority of the sites contained within the Made NDP have been completed and these are therefore indicated as existing commitments within the Plan instead of as allocations. This allows for a more flexible approach to sustainable development opportunities in the future, given that policy CH H7 (development boundary) limits the ability of sustainable development opportunities from coming forward outside of the development boundary, and Policy CH H1 (infill residential development) does not endorse windfall sites from coming forward but instead constrains unallocated development on a limited infill basis.

Furthermore, paragraph 14(b) of the NPPF states that for the NP to ensure that development which is in conflict does not come forward it needs “*policies and allocations to meet its identified housing requirement*”. The wording of paragraph 14(b) points out that allocations are **to meet** not retrospectively ‘*have met*’ housing need.

In not allocating any new uncommitted or unconsented sites for future development, it is not considered that the draft Plan accords with national policies to significantly boost housing supply.

The draft Plan considers this theme at paragraph 4.6 in which it states: *“In bringing forward proposals and policies for growth, this Plan recognises its responsibility to boost the supply of housing land”*. However, the Plan itself does not boost the housing supply by allocating additional land as allocated sites.

The next sentence of paragraph 4.6 of the draft Plan demonstrates this reluctance of the draft Plan to tackle the issue:

*“Nevertheless, it acknowledges that significant levels of new residential development have been permitted since 2011. These developments, when occupied, will put further strains on the infrastructure and services in the Village. Thames Water has expressed either significant concerns or that a study is required for wastewater and / or water supply on three of the above sites already granted planning permission”*.

## **Thames Water**

It should be noted that four of the now committed sites were subject of allowed planning appeals, and the ability of each development site to be accommodated within the Thames Water network would have been a principal consideration that the Planning Inspector would have considered. We therefore raise concern that the draft Plan would not meet the statutory duty to plan and provide for the infrastructure required to facilitate the sites.

This is supported by the various responses to the previous NP review in 2021 which notes that the schemes that have been permitted / allowed at appeal in Chinnor have not provided local infrastructure contributions to meet the increased demand in use. Similar responses were provided by local residents to our client’s site Land at Thame Road, Chinnor (P22/S4643/O) during the application determination process.

In relation to the current planning appeal, further discussions have been held with Thames Water regarding foul water capacity at Chinnor. A copy of the ‘Statement on foul water capacity’ by Thames Water dated 22nd September 2023 (Appendix One) sets out that:

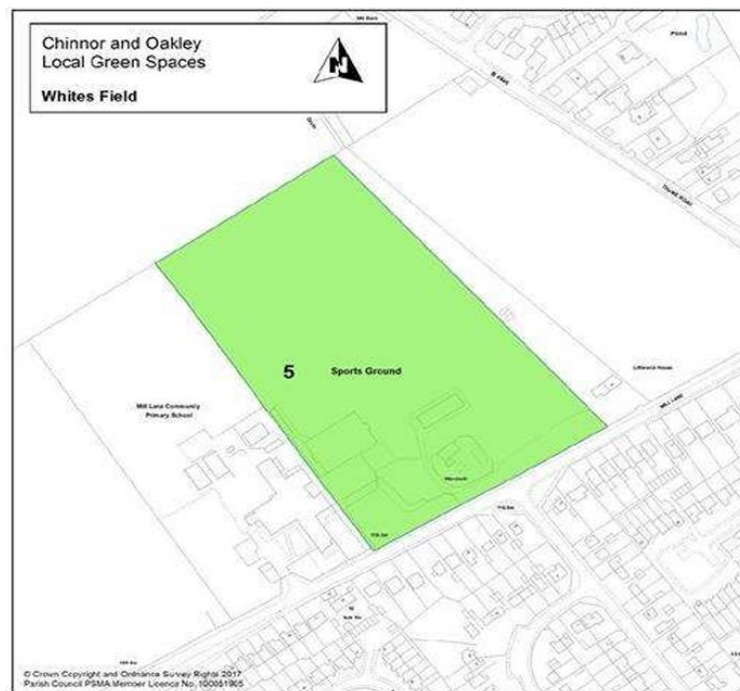
*“The current preferred network reinforcement proposal is to provide additional capacity by constructing an offline attenuation shaft, that will store excess foul water flow during rainfall.*

*Working with Gleeson Land, Thames Water has identified an opportunity to construct the offline attenuation shaft within the Land west of Thame Road, Chinnor development site. This opportunity would provide additional capacity to the existing foul sewer network in Chinnor for the proposed development on the site, as well as other consented development in the catchment.*

*The estimated volume of the attenuation shaft is 400m<sup>3</sup> for a design storm with a 1 in 20 year return period. The excess flow would be pumped back to the existing foul sewer network once the water level has returned to normal. The exact storage volume required is currently being assessed using our verified hydraulic model for the Chinnor catchment.”*

Should the appeal be allowed the provision of the above scheme is proposed to be secured through appropriately worded planning condition.

It is noted that the Parish Council resolved at its meeting on 16<sup>th</sup> October 2023 to invite Thames Water to consider the use of Whites Field as an alternative location for the drainage solution (shown on the plan overleaf).

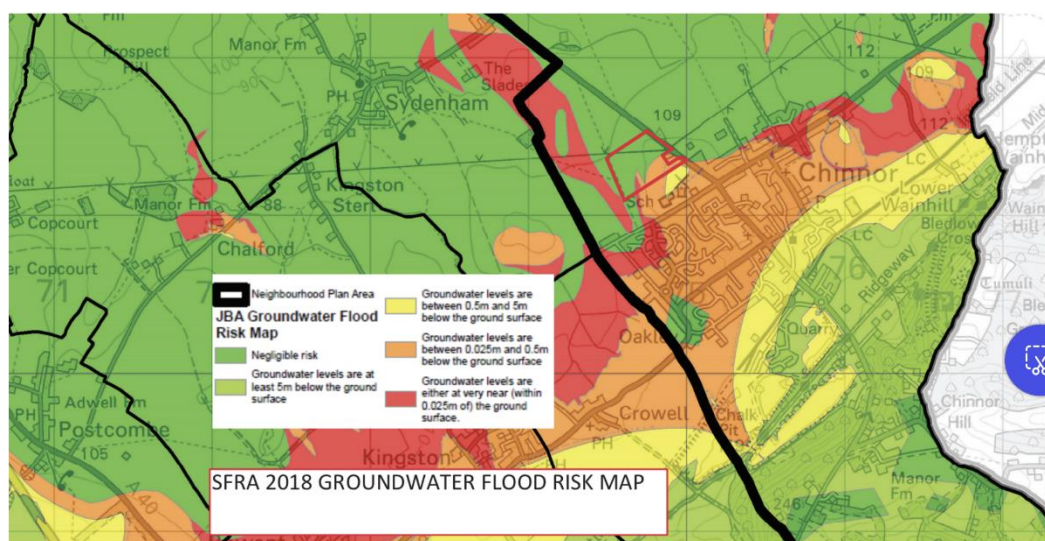


A copy of the response which was subsequently issued to Thames Water is provided at Appendix Two and states:

*“The Council notes that Thames Water has identified an ‘opportunity’ to construct the attenuation shaft within the site proposed for the new development at Thame Road but also has stated that this project is not dependent on the development proposals going ahead. The implication is that Thames Water have not yet found an alternative site.*

*There is already a similar scheme in operation on Council owned land off Station Road in Chinnor. The Council has a similar area of land, adjacent to the proposed development site, at Whites Field which may be suitable for this project. The Council would be willing to enter into preliminary discussions with Thames Water to assess the suitability of this site and the impact such works may have on the continued use of this area of recreational land.”*

We would note that no discussions have been held between Chinnor Parish Council and Thames Water on this alternative proposal and no technical work advanced to demonstrate its feasibility. There is no scheme. It is noted that Whites Field is identified to be an area at higher risk of groundwater flooding and is shown below.



Given the importance of the existing foul water issue in the Parish it is somewhat surprising that if a pollution solution is in the gift of the Parish Council as is now suggested, this has not been advanced through the Neighbourhood Plan process with an allocation or policy included accordingly. Whilst no details are available of the use of Whites Field, we would note that without the agreement of the landowner of land west of Thame Road, Chinnor to cross the site, this alternative scheme would seemingly require digging up Mill Lane and Thame Road to connect to the point at which the sewers back up a provide relief to that area. In contrast the Gleeson scheme involves a shorter length of pipework which can be laid at the same time as the connection from the development is constructed and could be delivered by the same Contractor under the same street works license.

An indicative programme of 2.5 years has been proposed by Thames Water to deliver the network reinforcement through their network reinforcement Delivery Partners if the Gleeson scheme were to be allowed. No timescales for the development of a scheme or its eventual delivery have been identified for the Parish Council proposals. It is also unclear whether sufficient existing funding would exist to enable the delivery of the scheme or if a shortfall would exist. Given the importance of the foul water issue we would suggest that the Neighbourhood Plan review is paused to allow this assessment work to be completed to ensure the policies proposed make appropriate provision for the strategy and do not prejudice its delivery, as discussed in relation to Policy CH GP1 below.

## Policy CH C1 – Design

Having reviewed the guidance contained at Appendix 3, some of the related aspects of the built form are very specific and detailed, and not considered to be consistent with paragraph 128 of the NPPF, which advises that the level of detail and degree of prescription of design policies should be tailored to the circumstances in each place and should allow a suitable degree of variety.

## Policy CH GP1 – Local Green Spaces

Policy CH GP1 of the Plan proposes to update the list of Local Green Spaces to include the Mill Lane Community Garden, which would bring the total number of Local Green Spaces (LGS) to 16.

Paragraph 102 of the NPPF sets out that that the LGS designation should only be used where the green space is:

*“a) in reasonably close proximity to the community it serves;*

*b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

*c) local in character and is not an extensive tract of land.”*

The supporting text to policy CH GP1 provides general information for each LGS to support the designations. However, it is not considered that the evidence base is sufficient for the new addition to the LGS.

Similarly, the Examiner may find it opportune to review some of the previous LGS designations to ensure that they still fulfil the requirements of paragraphs 101 – 103 of the NPPF. Any changes on the sites should be taken into account, especially in light of those that have recently occurred on some of the sites such as LGS 2 which has had the new Chinnor Pavilion built on it.

Paragraph 103 of the NPPF states:

*“Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”*

Paragraph 150 of the NPPF relates to Green Belt and identifies that *“certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.”* Whilst we would assume that the foul drainage solution would fall under an engineering operation the need for any above ground elements (such as pumps depending on the elevation of the site) are unknown as to whether the requirements of Paragraph 150 of the NPPF are met. Given the importance of the foul drainage solution to the Parish as expressed throughout the planning appeal, as suggested above it is considered that the Neighbourhood Plan review is paused to allow this assessment work to be completed to ensure the policies proposed make appropriate provision for the strategy and do not prejudice its delivery.

Furthermore, given the temporary loss of playing and sports facilities which we would envisage would be required to facilitate the construction of the foul water solution, we would note that there will necessarily be consultation with Sports England. Given the clear importance of this open space to the local community for a range of activities, further information will be required as to the potential impact of these works and the timescales involved and whether these can be achieved noting the proposed Local Green Space designation.

## **Policy CH GP2 – Protection of Habitats of Significance**

The draft Plan is proposing a Net Biodiversity Gain of at least 10% for all development within the Parish. However, Policy ENV3 (Biodiversity) of the adopted South Oxfordshire Local Plan 2011 -2035 does not specifically require that development provides a 10% gain or above, only that *“All development should provide a net gain in biodiversity where possible”*.

In its current form the NP will not, therefore, conform to the requirements of the adopted Local Plan or meet the requirements of the Basic Conditions set out at paragraph 8(2)(e) of the Town and Country Planning Act 1990 whereby the making of the neighbourhood plan is required to be in general conformity with the strategic policies contained in the development plan for the area.

With the Environment Act coming into effect in January 2024, there will be a mandatory requirement for a 10% Net Gain in Biodiversity and it is unnecessary to write it into the draft Plan.

Therefore, the following sentence should be deleted from the second bullet point to Policy CH GP2 of the draft Plan: *‘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, where appropriate”.*

## **Policy CH CF1 – The Protection of Community Facilities**

We have no comment to make on this, other than the proposed change to the policy does not provide any value to the policy meaning.

## **Policy CH E1 – Education Facilities**

Policy CH E1 is a new policy proposed as part of the review and seeks to look at securing a new school / pre-school or a plan to expand the education provision already present in Chinnor.

Policies CH H1 and CH H7 direct development in Chinnor within the development boundary, in a sustainable location. The policy wording for CH E1 does not identify or allocate a site for a new school or take into account a geographical position for a new school / pre-school which should be located in a sustainable location. As presently drafted, there is no recognition that a new school/pre-school should be in a sustainable location and the policy wording should be amended to reflect this.

Furthermore, the policy should be updated to reflect the current situation whereby Oxfordshire County Council (“OCC”) have agreed the expansion of the existing Mill Lane Primary School (see Appendix Three) to support further growth. OCC have now received the options appraisal into the potential to expand Mill Lane Primary School and have confirmed that there does appear to be a feasible solution to expanding the school, which would require the removal of the current temporary classrooms to create a footprint on which to build a new two-storey building. This would expand the school from 1 form entry to 1.5 form entry, creating 120 additional primary and nursery places, sufficient to accommodate the pupils expected to be generated from the Thame Road site and help to address the perceived deficiencies in the existing facilities.

The policy wording for CH E1 is therefore wrong and should be updated to specifically reference the current situation with Mill Lane Primary School, or alternatively the policy should be deleted as currently drafted. Whilst we note the commentary in the Consultation Statement in response to the comments received from Oxfordshire County Council as education authority, this does identify that an expansion of the existing Mill Lane Primary School is a feasible option.

## **Conformity with Basic Conditions**

Having set out the above specific policy objections, we therefore assess the Plan against the “basic conditions” (see paragraph 8 (2) of Schedule 4B of the TCPA 1990). In light of the commentary provided above, we would contest whether the Neighbourhood Plan as currently draft accords with basic condition d which requires it to contribute to the achievement of sustainable development. The NPPF makes clear that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental. It is important that all three of these objectives are also met by the Neighbourhood Plan and as shown by our commentary above it is currently clear that the Plan will not assist in achieving the social and environmental objectives.

## **Consultation Statement**

The consultation is accompanied by a Consultation Statement which summarises the consultation to date and the responses received. We note that this includes a direct response from the Parish Council to our previous submissions. Whilst some of our previous comments have been addressed we note that a number of our objections remain and have been discussed above and are therefore not repeated here.

## Summary

We trust that the examiner will consider the above comments in the Examination of the Plan and we look forward to continuing to engage with this process.

Should you require any clarification of the comments made or wish to discuss in further detail please contact us.

Yours sincerely

  
**Director**

 [@turley.co.uk](mailto:info@turley.co.uk)



## Appendix 1: Statement from Thames Water





## Statement on foul water capacity

**Development site: Land west of Thame Road, Chinnor**

**22<sup>nd</sup> September 2023**

### **1. Background and purpose**

This statement has been prepared by Thames Water on the request of South Oxfordshire District Council (SODC) in relation to a proposed development known as *Land west of Thame Road, Chinnor*.

An outline planning application for up to 150 homes on the development site has been submitted to South Oxfordshire District Council (SODC), reference P22/S4643/O.

The original planning application was refused by SODC in April 2023.

In the decision notice for P22/S4643/O, SODC raised eight areas for refusal. The third area related to wastewater concerns and states:

The site is within a location that has experienced high groundwater and there are historic records of flooding associated with foul water flows from drainage infrastructure to nearby properties, Thames Water have advised that this is a groundwater affected drainage system. By extending the foul network in an area of high groundwater, there is an increased risk of groundwater entering the system due to a larger network. Inadequate consideration has been given to this risk of increased flooding in the Flood Risk Assessment, a sequential test has not been carried out and suitable mitigation has not been considered. The proposals is therefore contrary to the NPPF and Policy EP4 of the South Oxfordshire Local Plan 2035.

An appeal against the refusal has been submitted by the applicant, Gleeson Land.

Meetings have been held between SODC, Thames Water and Gleeson Land in July and August 2023 to discuss foul water capacity. It was agreed in these meetings that Thames Water would provide a statement regarding the way in which Thames Water manage network upgrades to accommodate new developments.

### **2. Foul water drainage in Chinnor**

The wastewater network in Chinnor drains to Chinnor Sewage Treatment Works (STW). The extent of the STW catchment is shown in blue shading in Figure 1.

Thames Water has several projects being undertaken in Chinnor to address groundwater infiltration, sewer flooding and growth.

The primary focus of this statement is to confirm work being undertaken to address growth, but a short summary on other project information is provided below.

#### **2.1 Chinnor STW upgrades**

Chinnor STW is being upgraded to increase treatment capacity from 47.0 l/s to 73.8 l/s. The latest information on the upgrades at Chinnor STW, and other STWs, can be accessed using the link below:

[Investment plans for storm discharge sites | Thames Water](#)

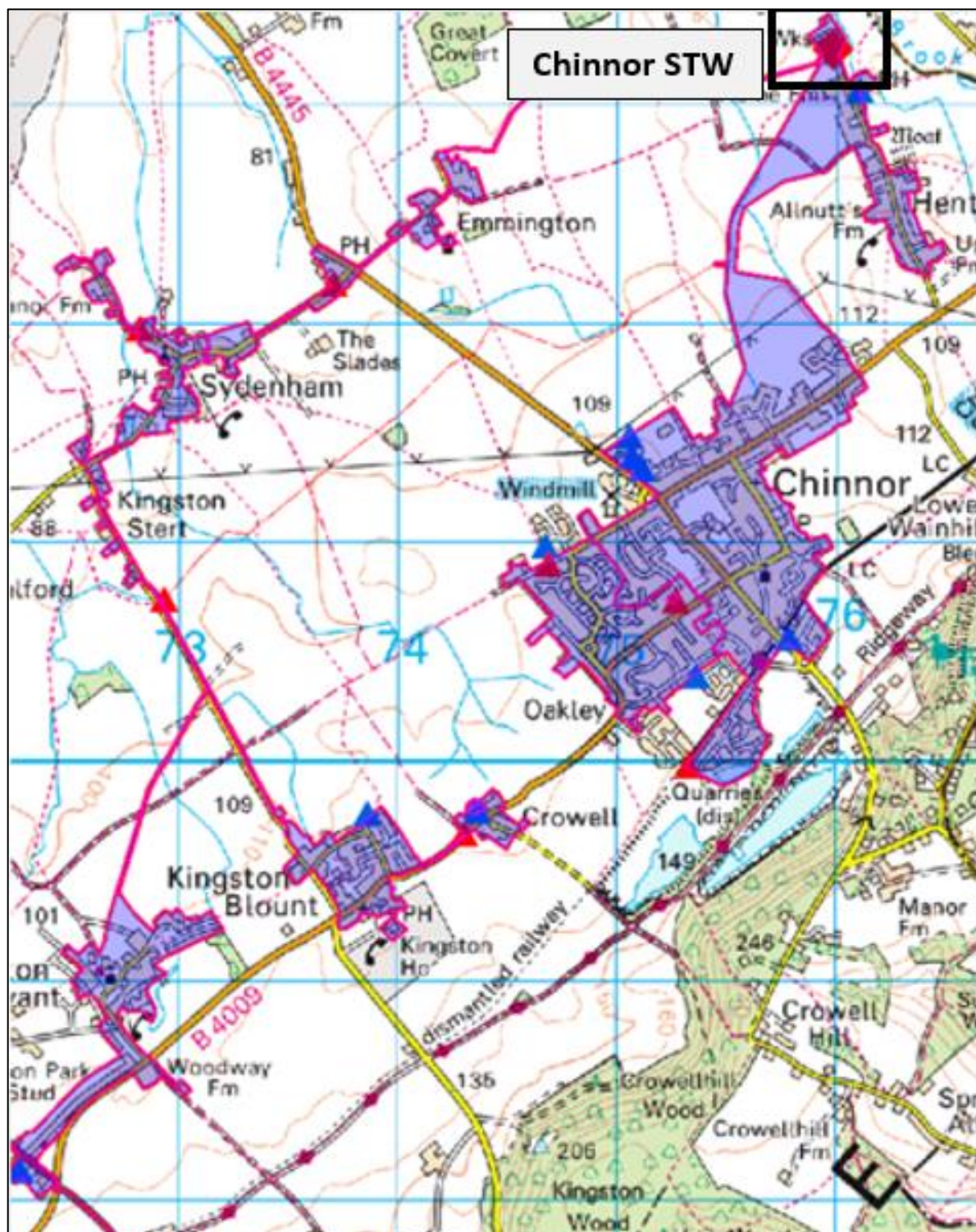


Figure 1 – Areas shown in blue hatching drain to Chinnor STW

## 2.2 Groundwater infiltration

Chinnor STW catchment is affected by groundwater infiltration and sewer flooding. A summary of this groundwater issues experienced in Chinnor STW catchment and plans to address it can be found in the Groundwater Impacted System Management Plan (GISMP). A link to the latest version of the report and programme, as published on our website, can be accessed using the link below:

[Chinnor GISMP - October 2022](#)

### **2.3 Sewer flooding**

Thames Water recognises that flooding occurs at several locations in Chinnor from the foul sewer network during rainfall.

The development of a flooding programme for AMP8 (2025-2030) is underway and will form part of the business plan to be submitted to Ofwat in late 2023.

Discussions are also ongoing internally within Thames Water regarding seeking additional funding to protect properties from flooding as part of the improvement works being completed within Chinnor to address growth.

## **3. Network growth**

### **3.1 Thames Water Process for addressing impact of growth**

Standard information on our process for addressing the impact of growth on our networks is provided on our website, which can be accessed using the following link:

[pre-planning-enquiry-process.pdf \(thameswater.co.uk\)](https://www.thameswater.co.uk/pre-planning-enquiry-process.pdf)

### **3.2 Responsibilities for providing network reinforcement**

Thames Water has responsibilities under Section 37 (water) and Section 94 (wastewater) of the Water Industry Act (WIA) 1991 to provide, improve and extend clean water and wastewater networks to ensure an area is effectually supplied and drained respectively.

We refer to upgrade works undertaken to accommodate new developments, to meet responsibilities under Section 37 and Section 94 of the WIA, as network reinforcement.

### **3.3 Funding of network reinforcement**

Clean water and wastewater Infrastructure charge fees are paid by developers when connecting new properties to our clean water network.

Infrastructure charges are used to fund network reinforcement projects, provided the development site meets the criteria set out by Ofwat. Ofwat guidance can be viewed using the following link:

[Charging rules for new connection services \(ofwat.gov.uk\)](https://www.ofwat.gov.uk/charging-rules-for-new-connection-services/)

Infrastructure charge rates are the same across the whole of Thames Water's region, rather than being fixed based on a site basis or geographical areas. Charges are reviewed and updated annually.

Further information on the infrastructure charges can be found in our charging arrangements documentation, which can be found on our website using the following link:

[Charges | Developer services | Thames Water](#)

### **3.4 Planning condition request**

Thames Water are consulted by local planning authorities on planning applications. Consultations are managed by our Development Control Team and reviewed by the System Planner for the specific catchment in which the planning application is located.

Where the System Planner has capacity concerns, and depending on the proposed timescales of the development, our Development Control Team will respond to the consultation for Thames Water, requesting an appropriately worded condition be added to the planning application.

The request for a condition is to ensure the development does not outpace the delivery of the network reinforcement required to serve the development. We normally request that no occupations are made from the development site until either (1) the network reinforcement works required for the site are completed or (2) an infrastructure phasing plan has been agreed between Thames Water and the relevant developer(s).

The planning process is the only way in which Thames Water can formally request engagement with key stakeholders to ensure sufficient time is allowed for us to complete network reinforcement to increase capacity ahead of need and protect existing and future customers.

### **3.5 Addressing capacity issues in Chinnor**

It is noted by Thames Water that there have been several new development sites built and granted planning permission in the village of Chinnor. To address recent and planned growth, Thames Water has an ongoing project to provide additional foul water capacity in the village.

The current preferred network reinforcement proposal is to provide additional capacity by constructing an offline attenuation shaft, that will store excess foul water flow during rainfall.

Working with Gleeson Land, Thames Water has identified an opportunity to construct the offline attenuation shaft within the *Land west of Thame Road, Chinnor* development site. This opportunity would provide additional capacity to the existing foul sewer network in Chinnor for the proposed development on the site, as well as other consented development in the catchment.

The estimated volume of the attenuation shaft is 400m<sup>3</sup> for a design storm with a 1 in 20 year return period<sup>1</sup>. The excess flow would be pumped back to the existing foul sewer network once the water level has returned to normal. The exact storage volume required is currently being assessed using our verified hydraulic model for the Chinnor catchment.

Figure 2 provides a high level indicative layout of the proposal and how it would connect with the existing foul sewer network in Chinnor.

*Note: providing additional capacity in Chinnor to address consented development is not dependent to the outcome of the appeal associated with the Land west of Thame Road, Chinnor site.*

### **3.6 Timescales**

Thames Water typically will not commence with investigations to quantify the size of any network reinforcement required to accommodate a proposed development until after planning has been granted. This is to minimise abortive resource and spending associated with reviewing sites that do not receive permission.

Standard timescales for modelling, design and construction are discussed in pre-planning enquiry process document, which can be accessed using the following link:

[pre-planning-enquiry-process.pdf \(thameswater.co.uk\)](https://www.thameswater.co.uk/pre-planning-enquiry-process.pdf)

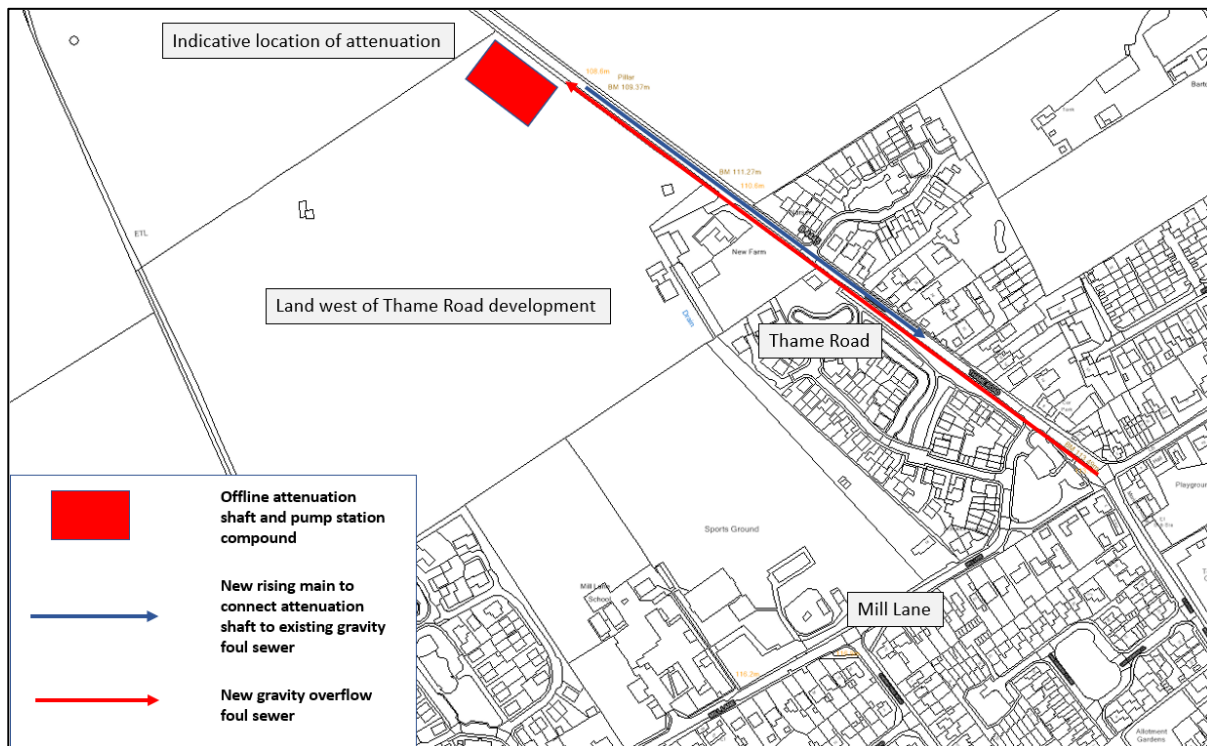
<sup>1</sup> For Development Impact Assessments, hydraulic modelling will analysis design storms with return periods up to 1 in 20-years. Storms with a return period greater than 1 in 20-years are classified as extreme events in line with Ofwat guidance.



However, as a project has already commenced in Chinnor to provide foul water capacity, assessments are ongoing to include the impact of the *Land west of Thame Road, Chinnor*.

An indicative programme of 2.5 years has been proposed to deliver the network reinforcement through our network reinforcement Delivery Partners.

If planning is not granted, Thames Water will continue with delivery of a network reinforcement scheme to provide additional capacity in the village for recent development.



**Figure 2 – schematic layout of network reinforcement being explored by Thames Water and Gleeson**

### **3.7 Recommended Planning Conditions**

If SODC are minded to grant planning approval, we would recommend that an appropriately worded planning condition planning is attached to any approval. The wording may be similar to that proposed below:

*The development shall not be occupied until confirmation has been provided that all foul water network upgrades required to accommodate the additional flows, from this and other development in the catchment, have been completed.*

*Reason - Network reinforcement works are required to accommodate the proposed development and others in the catchment . Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.*

## **Appendix 2: Chinnor Parish Council letter to Thames Water**



# Chinnor Parish Council

Community Pavilion  
Station Road  
Chinnor  
Oxfordshire

Thames Water Ltd  
Clearwater Court  
Vastern Road  
READING RG1 8DB

FAO [REDACTED]  
Operations Director

17<sup>th</sup> October 2023

Dear [REDACTED]

## Chinnor, Oxfordshire – Drainage, Sewage and Water Supply

I am the Clerk of Chinnor Parish Council and I am writing on behalf of the Council and the community of Chinnor with regard to the considerable and damaging issues relating to the Drainage, Sewage and Water Supply networks which have been ongoing for several years now affecting residents and businesses alike.

At the meeting of the Full Council held on 16 October 2023, during the course of discussions relating to the ongoing planning Inquiry into a proposed development to the west of Thame Road in Chinnor, a Statement, dated 22 September 2023, relating to Foul Water capacity but also covering Network capacity, prepared by Thames Water was discussed. Within this Statement Thames Water advised that Chinnor catchment has a groundwater affected drainage system. A statement that is fully accepted by many residents and businesses who, over the last few years, have suffered pollution and damage to their properties.

Sadly, to the disappointment of residents and businesses, little has been done by Thames Water in mitigation over the corresponding period. The main issue for the Community is that over the last five years new development, specifically housing, has increased the number of dwellings by over 43% - an increase of over 1000 properties with a subsequent rise in population to over 8000 with no consequential increase in the infrastructure.

Contained within the Thames Water Statement the following comments were made in respect of works being carried out or proposed:-

- **Foul Water Drainage network** – drains to Chinnor Sewage treatment Works – upgrade to be completed April 2023 to increase treatment capacity... **Has this work been completed? What capacity has it been upgraded to?** Figures quoted in the Chinnor Drainage Strategy 2015-2025 indicates that all the proposals contained therein are based on an increase of 106 properties over that 10 year period. No update of this Strategy has been published to take account of the vast increase in new development and presumably no works have been carried out.

- **Groundwater Infiltration and Sewer Flooding** – affects the Chinnor STW catchment – Plans to address this are stated to be contained in the Groundwater Impacted System Management Plan published in 2021. These include the development of a flooding programme (2025-2030) to form part of a business plan to be submitted to Ofwat later in 2023. Also stated is that internal discussions are taking place within TWA regarding seeking additional funding to protect properties from flooding as part of the improvement works being completed within Chinnor to address growth (past, present and future) **What are these works? When will they start and when will they be completed?**
- **Network Growth** – Within the Statement it is stated that there is an **ongoing** project to provide additional foul water capacity in the village with the current preferred network reinforcement proposal of the provision of additional capacity by constructing an offline attenuation shaft that will store excess foul water flow during rainfall with the excess flow being pumped back to the existing foul sewer network once the water level has returned to normal. It is needed now ! **When will this project start and finish?**

The Council notes that Thames Water has identified an 'opportunity' to construct the attenuation shaft within the site proposed for the new development at Thame Road but also has stated that this project is not dependent on the development proposals going ahead. The implication is that Thames Water have not yet found an alternative site.

There is already a similar scheme in operation on Council owned land off Station Road in Chinnor. The Council has a similar area of land, adjacent to the proposed development site, at Whites Field which may be suitable for this project. The Council would be willing to enter into preliminary discussions with Thames Water to assess the suitability of this site and the impact such works may have on the continued use of this area of recreational land.

It is hoped that should agreement be reached then the mitigation works could then start in a shorter timescale than that indicated by Thames Water utilising the proposed development site.

The Council is mindful of the issues currently being faced by the residents and businesses of Chinnor and notwithstanding the project regarding the installation of the attenuation shaft, would request that a meeting is held with the Council as a matter of urgency to discuss the numerous issues raised within this letter.

On behalf of the Council, I look forward to a swift response.

Yours sincerely

Clerk to Chinnor Parish Council



## Appendix 3: OCC Mill Lane Primary School Project

***Project***    Mill Lane 1FE Primary School inclusive of Nursery

**Extension and Associated Alterations to increase  
Accommodation to 1.5FE including the removal of  
2No. Temporary Classrooms**

**CONFIDENTIAL**

**Written by [REDACTED]    May 2023**



## Document Control Sheet

Project Title      **Mill Lane 1FE Primary School, inclusive of Nursery Extension and Associated Alterations to increase Accommodation to 1.5FE including the removal of 2No.Temporary Classrooms.**

Report Title      **Options Appraisal**

Revision          -

Status             **Draft**

Control Date      **May 2023**

### Document Check and Authorisation

Issue	Status	Author	Date	Check	Date	Authorised	Date
1.0	Draft		26/05/23				

### Document issue

Organisation	Contact	Copies
Oxfordshire County Council		1

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- 3. Review of Existing External and Internal Areas**
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  - 3.4 Car Parking**
  - 3.5 Existing Accommodation**
  - 3.6 Proposed Accommodation**
  - 3.7 Pros of New Build Solution and Alterations to Existing**
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- 4. Estimated Costs**
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## **1. INTRODUCTION**

The purpose of this Option Appraisal is to review the possibility of expanding the current Mill Lane Primary School, Chinnor, from a 1.0 Form of Entry Primary inclusive of Nursery, up to a 1.5 Form of Entry, accounting for the required accommodation and site external areas that would be required to provide for the increase in pupil numbers and verifying the site is of sufficient size. This would include facilitating the replacement of the 2no existing temporary accommodation classroom blocks consisting of 4no teaching spaces that are currently located to the north-west side of the external hard play.

An increase in pupil provision for Mill Lane School would take the current pupil on role from 270 pupils (210 + 52 FS2 + 8 FS3) to 390 pupils (315 + 65 FS2 + 10 FS3).

## **2. EXECUTIVE SUMMARY**

Currently there is a Planning Application for a further 150no homes in Chinnor directly adjacent to the Primary School which it is estimated could generate 40no primary pupil places excluding the Nursery. There are also other proposed housing developments around the village with at least 100no homes still to be completed on permitted sites.

As such it is important to undertake this study so that OCC are properly informed as to the potential to expand the existing school on this site.

The Primary School also has a case for accessing funding set aside to deliver replacement classrooms for schools where classrooms are housed in temporary accommodation. This has been taken into consideration with this report.

The breakdown of the estimated costs for carrying out the required work is as follows:

**Mill Lane ICPCC – Total forecast budget of £4.7m @ 2Q2025.**

Please refer to Section 4 for further information on the costs.

### Future Proofing

Given the limited site area no further expansion of the school beyond 1.5FE would in all likelihood be feasible.

## **3. REVIEW OF EXISTING EXTERNAL AND INTERNAL AREAS**

### **3.1 THE SITE**

#### **Site Ownership**

The site is owned by OCC inclusive of the school playing field.

#### **Site Restrictions**

The school is not located within a conservation area, and there does not appear to be any Tree Preservation Order's on the site itself or within 50 metres of the site as identified on the South

Oxfordshire District Council website. The school buildings are located to the south-east end of the site facing onto Mill Lane, with a good-sized playing field to the north-west capable of being set out with an under 11's football playing pitch.

### **Site Area**

The following areas are based on the 210no pupil provision for 1.0FE and 315no Pupil provision for 1.5FE with the Nursery pupils external provision accounted for within their own Foundation Stage Garden. The current School Site Area is **20,187m<sup>2</sup>**.

- In BB103 the recommended minimum Gross Site Area provision for a 1.0FE Primary School with **270no** pupils is **10,991m<sup>2</sup>**.
- In BB103 the recommended minimum Gross Site Area provision for a 1.5FE Primary School with **390no** pupils is **14,987m<sup>2</sup>**.

**In BB103 terms, the existing site would therefore be capable of accommodating the overall expansion of the school to 1.5FE.**

## **3.2 EXTERNAL AREAS**

### **Soft Outdoor PE**

The existing School Site total Playing Field Area is capable of accommodate an under 11's football pitch which you would expect included in a 1.5FE Primary School. Overall, there is approximately **6,160m<sup>2</sup>** of Playing Field area, though some of that is dotted with individual trees that would limit where possible pitch and running track marking could be located and orientated.

- In BB103 the recommended minimum Playing Field Area provision for a 1.0FE Primary School with 210no pupils is **4,200m<sup>2</sup>**.
- In BB103 the recommended minimum Playing Field Area provision for a 1.5FE Primary School with 315no pupils is **6,300m<sup>2</sup>**.

**Against the existing Playing Field Area of 6,300m<sup>2</sup>, this would suggest the area is still of a sufficient size to accommodate a 1.5FE provision.**

### **Soft Informal & Social Area**

The existing Soft Informal & Social Area is approximately **5,278m<sup>2</sup>** a large proportion of which consists of the large swathe of heavily wooded area to the west of the main school building and car park that is used for Forest School.

- The BB103 recommended minimum Soft Outdoor area for a 1.0FE school with 210no pupils is **1,020m<sup>2</sup>**.
- The BB103 recommended minimum Soft Outdoor area for a 1.5FE school with 315no pupils is **1,230m<sup>2</sup>**.

**Against the existing Soft Informal and Social Area of 5,278m<sup>2</sup>, this would suggest the area is still of a sufficient size to accommodate a 1.5FE provision. Even on the basis that the New 6 Class Block slightly reduces this area to 5,229 m<sup>2</sup>, the overall Soft Informal and Social Area is still significantly larger than the requirement.**

### **Habitat Area**

The existing Habitat Area has been included in the overall Soft Informal and Social Area above, given the overall large size of the woodland and the fact there is no designated separate habitat area provision.

- In BB103 the recommended minimum Habitat Area provision for a 1.0FE Primary School with 210no pupils is **105m<sup>2</sup>**.
- In BB103 the recommended minimum Habitat Area provision for a 1.5FE Primary School with 315no pupils is **157.5m<sup>2</sup>**.

**Against the existing Habitat Area accounting for it being part of the 5,278m<sup>2</sup> area above, this would suggest the area is still of a sufficient size to accommodate a 1.5FE provision.**

### **External Hard Play Area**

The existing External Hard Play Area provision is approximately **1,056m<sup>2</sup>**.

- In BB103 the recommended minimum External Hard Play Area provision for a 1.0FE Primary School with 210no pupils is **715m<sup>2</sup>**.
- In BB103 the recommended minimum External Hard Play Area provision for a 1.5FE Primary School with 315no pupils is **872.5m<sup>2</sup>**.

**Against the existing External Hard Play Area of 1,056m<sup>2</sup>, this would suggest the area is still of a sufficient size to accommodate a 1.5FE provision. Even on the basis that the New 6 Class Block slightly reduces this area to 1,036m<sup>2</sup>, the overall Hard Play Area is still significantly larger than the requirement.**

### **Hard Informal and Social Areas**

The existing Hard Informal and Social Area provision is approximately **810m<sup>2</sup>**

In BB103 the recommended minimum External Hard Play Area provision for a 1.0FE Primary School with 210no pupils is **410m<sup>2</sup>**.

In BB103 the recommended minimum External Hard Play Area provision for a 1.5FE Primary School with 315no pupils is **515m<sup>2</sup>**.

**Against the existing External Hard Play Area of 810m<sup>2</sup>, this would suggest the area is still of a sufficient size to accommodate a 1.5FE provision. Even on the basis that the New 6 Class Block slightly reduces this area to 717m<sup>2</sup>, the overall Hard Informal and Social Area is still larger than the requirement.**

### **Foundation Stage Garden**

The existing Foundation Stage Garden provision is approximately **690m<sup>2</sup>**, appreciating the overall Reception Class external Provision is already satisfied by the area above.

The OCC recommended minimum Foundation Stage Garden Area for a 1.0FE Nursery school based on 9m<sup>2</sup> per pupil and 30no pupils per class is **270m<sup>2</sup>**.

The OCC recommended minimum Foundation Stage Garden Area for a 1.5FE Nursery school based on 9m<sup>2</sup> per pupil and 45no pupils per class is **405m<sup>2</sup>**.

**Against the existing area of 690m<sup>2</sup>, this would suggest the Foundation Stage Garden is still of a sufficient size to accommodate a 1.5FE provision.**

### **3.3 ACCESS**

The existing vehicle and pedestrian access to the school site is directly off Mill Lane with a small car park area to the front. There is a separate pedestrian access to the Foundation Stage also off Mill Lane through an alternative gated entrance.

The Kitchen, refuse and delivery provision is likewise served off the main car park access. This also provides a vehicle route through onto the playground and beyond to the playing field in terms of serving maintenance vehicles. Any construction traffic would in all likelihood have to use this route to gain access onto the construction site area.

### **3.4 CAR PARKING PROVISION**

There are two distinct car parking areas serving the school staff and visitors. One relatively small car park to the front of the school within the school grounds; providing 10no spaces inclusive of an accessible space. The second public car park with approximately 50no spaces is adjacent to the school site to the east and is where the majority of school staff park.

It is not proposed to increase the school on-site car parking provision as part of the 1.5FE expansion. It would be impossible to provide all spaces on the school grounds in any case and the guidance requirement of 1.5 spaces per class, 2.5 spaces per nursery class plus 1 no visitor and 1no accessible space would require a 21no space car park. It is felt this provision is already served by the adjacent public car park. Advice would need to be sort whether an additional accessible space was considered necessary to the on-site school provision as a result of the 1.5FE expansion.

### **3.5 EXISTING ACCOMMODATION**

#### **Foundation Stage**

The existing Nursery Classroom (96.6m<sup>2</sup>) and Reception Classrooms (86.3m<sup>2</sup>) are housed in permanent accommodation, in separate classrooms adjacent to each other to the southern end of the main school building. Each Classroom has its own dedicated WC area (8.8m<sup>2</sup> and 6.6m<sup>2</sup>) and Storage, including a small Nappy Changing Room (2.4m<sup>2</sup>). There is a Family Room (15.9m<sup>2</sup>) adjacent the Reception Classroom with separate external access off the Main Entrance route.



The Nursery Classroom has a small Kitchenette (5.3m<sup>2</sup>). directly off of the teaching space. The two Classrooms are adjoined by a folding partition so that they can, if required, be opened up into one larger space. It is necessary to route through the Reception Classroom in order to access the Nursery space. The Reception Class is linked by a short length of corridor to one of the Key Stage 1 Classroom to the east side. The two Classrooms have direct access onto the Foundation Stage Garden to the east and south sides with both classrooms benefitting from some covered area. The Key Stage 1 Classroom to the north end of the Foundation Stage Garden likewise has access out onto the Garden. There is no separate FS Staff Workroom or Hygiene Room. The closest Accessible WC is located off the main entrance. The Staff WC's (8.3m<sup>2</sup> and 6.5m<sup>2</sup>) are however in close proximity to the Reception Classroom internal entrance.

### **Key Stage 1 Classrooms**

The 2no existing Key Stage 1 Classrooms flank either side of the Main Hall to the east side of the main school building. Key Stage 1 Year 01 Classroom (74.5m<sup>2</sup>) faces south onto the Foundation Stage Garden. It has its own Male (5.3m<sup>2</sup>) and Female (5.1m<sup>2</sup>) pupil WC's. There is a separate Resource Area (26.9m<sup>2</sup>) adjoining the classroom, with a folding partition and a large Teaching Store (4.6m<sup>2</sup>). It also adjoins the Reception Classroom via a short corridor.

The Key Stage 1 Year 02 Classroom basically mirrors the Key Stage 1 Classroom to the opposite side of the Hall. Again, it has its own Male (5.4m<sup>2</sup>) and Female (5.4m<sup>2</sup>) pupil WC's and a Resource area (24.4m<sup>2</sup>), but no separate Teaching Store. It faces out onto a north side external play and benefits from external canopy area. Between the Classrooms and Resource area provision, both teaching spaces are exceptionally large.

### **Key Stage 2 Classrooms**

The 4no existing Key Stage 2 Classrooms occupy the north end of the main building and one of the two Temporary Classrooms Blocks to the west of the External Play. The two main Block Classrooms are 89.4m<sup>2</sup> and 36.6m<sup>2</sup>, the second of these being significantly undersized for a Key Stage 2 Classroom. Directly adjacent is an ICT Classroom (36.6m<sup>2</sup>) which helps to alleviate the limited size of the smaller classroom. The two Classrooms share a set of Male (7.0m<sup>2</sup>) and Female (7.0m<sup>2</sup>) pupil WC's, each with 3no cubicles. Access to the furthest north Classroom is via the second Key Stage 2 Classroom which clearly does not help the functionality of the spaces. Both Classrooms have access out to the east side and share the canopied external area with the second Key Stage 1 Classroom.

The temporary block to the west of the External Hard Play accounts for the remaining Key Stage 2 Classrooms at 57.1m<sup>2</sup> and 57.2m<sup>2</sup>. There are WC's, Cloaks, and Storage between the two Classrooms.

### **Library**

The Library (41.8m<sup>2</sup>), and Library Withdrawal (35.7m<sup>2</sup>) are adjacent the main block Key Stage 2 Classrooms and the south end of the Hall. Access is off the main circulation and via a folding partition from one of the Key Stage 2 Classroom.

### **Pupil Kitchen and Group / Withdrawal Room**

A second temporary block located directly to the west of the Key Stage 2 Temporary houses a Pupil Kitchen (57.1m<sup>2</sup>) and Group / Withdrawal Room (57.2m<sup>2</sup>). Again, there are WC's, Cloaks, and Storage between the two teaching spaces.

### **Main Hall and Storage**

The Main Hall (145.2m<sup>2</sup>) is central to the overall building plan and is closely accessed from the Main Entrance. There is a court external area to the east, but otherwise it is hemmed in on all sides. There is a PE Store (8.2m<sup>2</sup>) directly off of the Hall and a Music Store (10.8m<sup>2</sup>) adjacent. Unusually, the Kitchen relates to the separate Small Hall rather than adjoining the Main Hall.

### **Multi-Use Circulation**

Directly adjacent the Main Hall is a Multi-Use Circulation Space (43.6m<sup>2</sup>). There is a Curriculum Resource Store (8.6m<sup>2</sup>) and Table & Chair Store (8.7m<sup>2</sup>) served directly off of the space. It accesses the Small Hall to the west side

### **Small Hall / Studio**

The Small Hall / Studio (52.9m<sup>2</sup>) is part of the west wing of the main building along with the Kitchen, Administration and Staff Room. There is a change in level with a ramp down as you enter. The Kitchen is directly adjacent, so it is assumed lunch is served here, possibly extending out into the multi-use circulation.

### **Refectory Kitchen**

The kitchen (37.6m<sup>2</sup>) in itself is below the guidance of 47.0m<sup>2</sup>, but the area includes a Larder Store (7.8m<sup>2</sup>), separate Dry Goods Store (3.4m<sup>2</sup>), Kitchen Staff Changing (6.3 m<sup>2</sup>) and Staff WC (2.9 m<sup>2</sup>). Although the main Kitchen space itself is relatively tight, overall, this is large kitchen space. It has external access to the west side out to the Car Park and Delivery area.

### **Plant Room**

The Plant Room (36.5m<sup>2</sup>) backs onto the Kitchen with separately housed Electric Meters (1.7m<sup>2</sup>) adjacent. As with the Kitchen. It can be easily serviced from the car park.

### **Main Entrance**

There is a generous Main Lobby Entrance (18.8m<sup>2</sup>) to the front of the school with a Accessible WC (4.5 m<sup>2</sup>) directly off of it. This leads into the Admin Circulation (37.4 m<sup>2</sup>) with the Main Hall in front, the Foundation Stage around to the right and the Administration to the left.

### **Administration**

The existing Administration Office, though undersized at 9.4m<sup>2</sup> is in a good location with clear visibility of the entrance lobby and approaching visitors. There is a separate Reprographics Room (10.2m<sup>2</sup>) serving the administration staff and Head Teacher's Office (10.5m<sup>2</sup>) and is directly adjacent to the Reception Office along with a Bursar's Office (12.3m<sup>2</sup>) to the opposite side. The School Meeting Room (14.9m<sup>2</sup>) is served directly off the Staffroom to the corner of the west wing. There are 5no.staff toilets, 2no Male and 2no Female located close to the school entrance lobby which can be used by staff and visitors alike. The WCs are Inclusive of an Accessible WC and would serve up to 25no staff. A Site Cleaners Store (9.6m<sup>2</sup>) completes the Administration accommodation.

### **Staffroom**

The Staffroom (29.1m<sup>2</sup>) is located to the end of the Administration corridor. This is under the 34m<sup>2</sup> area but benefits from the direct access to the Meeting Room next door which can be used for planning, preparation, and assessment (PPA).

### **3.6 PROPOSED ACCOMMODATION**

The proposed works respond to the need to expand the existing accommodation up to a 1.5FE Primary School providing all teaching accommodation within permanent classrooms of the appropriate size and proportion.

In order to increase the pupil numbers in each Key Stage, each part of the teaching accommodation would need to expand in some form. In meeting the expansion needs of the Nursery, and then the Reception Classrooms, everyone would move along one Classroom so to speak. With some limited internal alterations, the result would mean that the existing main block could accommodate the Foundation Stage and Key Stage 1. It would then be necessary to build a new 2 storey Key Stage 2 block of 6no Classrooms removing the 2no Temporary Blocks currently on Site.

#### **Foundation Stage**

There is 1no Nursery Classroom of **96.5m<sup>2</sup>** plus associated accommodation. The existing Nursery Classroom adjoins the existing Reception Class at **86.3m<sup>2</sup>**. The overall Foundation Stage works as one complete unit with circulation through the Reception Classroom to gain access to the Nursery Classroom. Any expansion of the Foundation Stage provision would really still have to function in this way unless significant alterations and adaptations were also to be accounted for. The Foundation Stage accommodation backs onto the school front entrance external square which leads directly into the Main Entrance Lobby. The classrooms themselves then face onto a Foundation Stage divided Garden area, which itself is bordered by the south-east school boundary. There is very limited opportunity to expand the Foundation Stage building footprint or surrounding garden area. Possibly a small area to the south end of the building, but that would impact on the existing Nursery Canopy and be limited in overall area by the school boundary onto Mill Lane. The most likely solution would be to accept the external area at the 690m<sup>2</sup> it already occupies whilst reassigning the existing accommodation to expand the Nursery Classroom provision and relocate the Reception Classroom.

**1.5FE Nursery Requirement** – Would require **175m<sup>2</sup>** of Nursery Classroom Accommodation. Basically **2.3m<sup>2</sup>** per pupil for **75no pupils** in total. Where a 'half classroom' is required, the area would be based upon 15no pupils and adjoin the Early Years classroom. This would suggest the Nursery teaching space takes up the existing Reception Classroom area, with the area for the 'half classroom' also accommodated within the overall available classroom footprint of **183.1m<sup>2</sup>**, accepting of remodelling and additional WC's and storage that would need to be accommodated. It suggests that for the most part the building footprint already in place could accommodate the extra 1.5FE Nursery requirement all appreciating the existing Reception Classroom would have to be relocated. The alternative is there is an existing Jack and Jill Pre School on the site to the south of the main building, which could in turn suggest the existing Nursery Classroom would suffice and no Nursery expansion would be necessary. In turn, the existing Reception and Key Stage 1 Classrooms discussed below would probably remain where they are, ultimately requiring One less Key Stage 2 Classroom to built overall. That said, such an organisational layout would locate 1no Key Stage 02 Classroom in the existing Block, whilst the remaining 5no Key Stage 02 Classrooms as opposed to 6no would be in a separate Key Stage 2 block. This is of course possible, but the most likely outcome would be to still build a 6 Class Key Stage 2 block and use the existing building Classroom space for an alternate use. As such, in the scenario here, we have continued with the idea of the Nursery needing to expand.

**Existing Reception** – The existing 1no Reception Classroom of **86.3m<sup>2</sup>** shares the FS Garden Area.

**1.5FE Reception Classroom Requirement** – Would require **105m<sup>2</sup>** of Reception Classroom Accommodation. A class and a half effectively. The existing Key Stage 1 Classroom is adjacent the Reception Classroom. On the basis that the Nursery accommodation expands into the existing Reception Classroom, the existing Reception would likewise have to be relocated into the Key Stage 1 Classroom accommodation. The current Key Stage 1 Classroom is **74.5m<sup>2</sup>**, plus there is an adjoining Resource area of **26.9m<sup>2</sup>**, so an area of **101.4m<sup>2</sup>** in total. There are associated WCs with the Classroom and some storage, and whilst it will be slightly under area, it suggests there is sufficient accommodation to house the Reception Class provision. The Key Stage 1 Classroom includes for a canopy and faces out onto the Foundation Stage Garden Area, so conceivably this could work. The external Foundation Stage Garden area could remain relatively intact, with no work required. It would be difficult to expand the existing area in any case.

### **Key Stage 1 and 2 Provision**

**Existing General Teaching Key Stage 1 including Resource Area and Cloaks** – There are currently 2no Key Stage 1 Classroom areas 1no of **74.5m<sup>2</sup>**, as mentioned above, and 1no Classroom of **73.56m<sup>2</sup>**. Both Classrooms come with ample Resource areas **26.9m<sup>2</sup>** and **24.4m<sup>2</sup>**, plus associated WC's. The Classrooms flank the north and south sides of the Main Hall, and whilst there is a central external area between the Classrooms to the end of the Hall, there is little opportunity to expand either Classroom wing as the accommodation is hard up against the eastern boundary of the site.

**1.5FE Key Stage 1 Classroom Requirement** – Would require **186m<sup>2</sup>** of Key Stage 1 Classroom Accommodation. Basically, 3no Key Stage 1 Classrooms of **62.0m<sup>2</sup>** each. This is all accepting 1no existing KS1 Classroom has been given to the Reception Classroom teaching provision. It would make sense to retain the second Key Stage 1 Classroom at **73.56m<sup>2</sup>** to the north of the Hall as a Key Stage 1 Classroom and look to utilise the remaining north end of the school block as the 2no remaining Key Stage 1 Classrooms that are required, utilising the existing Key Stage 2 Classrooms at **89.4m<sup>2</sup>** and **36.6m<sup>2</sup>**, the ICT Classroom at **36.6m<sup>2</sup>**, and include the Library Withdrawal Room at **35.7m<sup>2</sup>** if necessary. The loss of the ICT space would be in line with the need to bring ICT into the General Teaching Classroom space rather than have a separate Classroom provision which is now rather outdated. The Library Withdrawal space could arguably be done without or incorporated into the overall Library space adjacent. Any reconfiguration to achieve the two Key Stage 1 classrooms would have to account for the limited circulation currently through the spaces and the need to gain access to the end of the block through the existing classroom, hence the need to use up all three areas to create 2no Key Stage 1 Classrooms. These Classrooms need to be approximately 62m<sup>2</sup> as a minimum along with separate 1.5m<sup>2</sup> Storage. The amalgamation of the Smaller Classroom and ICT Room with removal of the existing partition would create 1no Key Stage 2 Classroom of 74.4m<sup>2</sup>. The amalgamation of the Storage and Library Withdrawal space would likewise result in a Key Stage 2 Classroom of 62.4m<sup>2</sup>, whilst allowing for a relocated through corridor to one side alleviating the need to access through the classroom space. Centrally a Resource space of 40.0m<sup>2</sup> could be provided between the two Classrooms. The Classroom Storage element could also easily be accommodated here in separate furniture or alternatively as walled stores. The existing Key Stage 2 Male (7.0m<sup>2</sup>) and

Female (7.0m<sup>2</sup>) WC's each with 3no cubicles would remain to provide sufficient toileting for the reconfigured Classrooms. The assumption is that the WC's would remain relatively intact as they currently are and would only need redecoration, but further investigation is required.

**Existing General Teaching Key Stage 2 including Resource Area and Cloaks** – There are currently 4no KS2 Classrooms, one Classroom of **89.4m<sup>2</sup>**, and one Classroom of **36.6m<sup>2</sup>**, in the existing building and 2no of approximately 57.1m<sup>2</sup> each, located within one of the temporaries to adjacent the main hard play.

It should also be noted the Jack and Jill Pre School Building along with separate Changing Room Block Accommodation occupies the area directly north of the existing Main School Block, making any direct add on extension to the north wing impossible.

**1.5FE Key Stage 2 Classroom Requirement** – Would Require **372.0m<sup>2</sup>** of Key Stage 2 Classroom Accommodation. Basically, 6no Key Stage 2 Classrooms at 62m<sup>2</sup> each. Given the existing purpose-built Key Stage 2 Classrooms would in this proposal now be assigned to Key Stage 1 and accepting the remaining 2no Key Stage 2 Classrooms are in temporary accommodation which needs replacing, the most obvious solution would be to build a new separate Key Stage 2 Block to the north of the main school building and playground. This would consist of 6no Key Stage 2 Classrooms and the associated WC, Storage and Circulation over 2 storeys to limit the new building footprint Conceivably the new block could also incorporate a Group Room and a Food Bay to replace the loss of accommodation in the second temporary?

Any expansion would either have to account for at least 1no of the existing temporary Classrooms remaining in place until the new accommodation was completed or make allowance for the second block to be relocated during construction of the 6no Class Block? The illustrated Proposed Plan shows the new 6no Classroom Block in place of both temporaries, but if the new building were positioned further to the south-west, it might be conceivable to retain 1no temporary in place, all accepting that the new building would take out additional Soft Informal and Social Area.

Contractor access to the proposed site would be difficult given it would probably have to route down the west side of the existing hard play. Alternatively, a route could possibly be arranged to the outside of the western boundary. Any extension constructed in part on the existing Temporary Classroom area footprint would nevertheless be subject to a Section 77 Application as it would include some Hard and soft Informal Play Area. The removal of the 2no Temporary blocks and the replacement of a permanent block with a similar footprint would of course help in any Section 77 Application.

### **Associated Teaching Accommodation**

Consideration given to other spaces the school already has or is possibly lacking:

**Existing Food Technology Room** – As above, accepting both temporary blocks are removed from the site upon completion, the school would lose its Pupil Kitchen.

**1.5FE Food Tech Requirement** – **15.0m<sup>2</sup>** required for a Food Bay in the new Key Stage 2 Block.



**Existing Main School Hall – 145.2m<sup>2</sup>**, plus, the Small Hall / Studio of **52.9m<sup>2</sup>**, which the refectory Kitchen is associated with? It would indicate there is a large teaching / social space directly next to the Hall that is possibly used for dining? Between the Hall and Small Hall there is **198.1m<sup>2</sup>** of area.

**1.5FE Main School Hall Requirement –180.0m<sup>2</sup>** required. It is assumed the current setup probably works relatively well, appreciating there are two separate spaces. Unless there was a specific reason to change this it would be best left alone accepting that there is more than sufficient area provided and the two separate spaces of the Hall and Studio provide enough flexible teaching space to continue as they are.

**Existing Library / LRC – 41.8m<sup>2</sup> and Library Withdrawal - 37.5m<sup>2</sup>**

**1.5FE Library Requirement –** Would require **27.0m<sup>2</sup>**. The main Library space could remain as it is. The Library Withdrawal space would be lost to one of the Key Stage 2 Classrooms, but there would remain significant over provision in the remain Library space.

**Existing Small Group Rooms –** between the resource areas of the existing spaces there is sufficient Group space.

**1.5FE Group Room Requirement – 2no @ 8.0m<sup>2</sup> each.** A new Key Stage 2 Block would benefit from at least 1no Group Room.

**Existing FS Small Group Rooms –** between the FS areas of the existing spaces there is **15.9m<sup>2</sup>** Family Room / Small Group Room.

**1.5FE FS Group Room Requirement – 2no @ 6.0m<sup>2</sup> each.** The reorganised Foundation Stage Block would still accommodate this area.

**Existing SEN Resource Room –**There does not appear to be an SEN Resource Room.

**1.5FE SEN Resource Room Requirement – 12.0m<sup>2</sup>** It would need to be established whether a separate SEN room was required. Non is currently shown in the refurbished or new build accommodation though the proposed Food Bay to the First Floor could be split to provide a separate SEN Resource Room if this was considered appropriate.

**Existing Meeting / Group Room – 14.9m<sup>2</sup>**, accepting it is accessed through the Staffroom.

**1.5FE Meeting / Group Room – 12.0m<sup>2</sup>** required. The existing would suffice.

### **Staff and Office Accommodation**

**Existing MI Room –** There does not appear to be one?

**1.5FE Main SEN Resource Room Requirement – 12.0m<sup>2</sup>.** Possibly an element of the front administration accommodation could be utilised in some form if considered necessary?

**Existing Main Entrance - 18.8m<sup>2</sup>.**

**1.5FE Main Entrance – 5.0m<sup>2</sup>** is required. Acceptable as is.

**Existing School Admin and Sick Bay - 9.4m<sup>2</sup>,**  
**1.5FE School Admin and Sick Bay - 9.0m<sup>2</sup> required.** Acceptable as is.

**Existing Reprographics – 10.2m<sup>2</sup>.**  
**1.5FE Reprographics – 8.0m<sup>2</sup> required.** Acceptable as is.

**Existing Interview Room – None.**  
**1.5FE Interview Room – 6.0m<sup>2</sup> required.** Could be accounted for if considered necessary to front administration? But assumption here is there are other rooms that can be utilised for the purpose.

**Existing Bursars Office – 12.3m<sup>2</sup>.**  
**1.5FE Bursars Office –** Not really part of the 1.5FE Accommodation Schedule but appreciate it would remain here.

**Existing Heads Office - 10.5m<sup>2</sup>.**  
**1.5FE Heads Office – 16.0m<sup>2</sup> required.** Acceptable as is.

**Existing Staff Work Room -14.9m<sup>2</sup>.**  
**1.5FE Staff Work Room – 6.0m<sup>2</sup>** which, as part of the Staff Meeting Room, it is arguably used for this purpose and would remain acceptable as is.

**Existing Staffroom – 29.1m<sup>2</sup>.**  
**1.5FE Staffroom – 39.0m<sup>2</sup> required.** The Staff Work Room and Staffroom combined at **44.0m<sup>2</sup>** are sufficiently sized. Conceivably though you would create a Kitchenette Tea point for staff in the Key Stage 2 New Build accommodation to allow for some refreshments without returning to the main building.

**Existing Staff Work Room (SRP) – None.**  
**1.5FE Staff Work Room (SRP) - 3.0 m<sup>2</sup> required.** Again, as above and depending on the SRP location, room could be provided?

**Existing FS Staff / Workroom / Kitchen – 5.3m<sup>2</sup>.**  
**1.5FE FS Staff / Workroom / Kitchen - 12m<sup>2</sup> required.** Remodelling of Nursery area could account for this if considered necessary. None is shown in the proposed plan.

**Existing FS Laundry Room – None** indicated, but assume a washing machine and Dryer is included within the Nursery Kitchen accommodation?

**1.5FE FS Laundry Room - 4m<sup>2</sup> required.** Assumed the facility already exists but it should be verified. Again, if an upgrade or separate room were considered necessary it could be accommodated within the existing Nursery footprint. None is shown in the proposed plan.

## **Storage**

**Existing Central Store – 10.2m<sup>2</sup> plus Curriculum Resources - 8.6m<sup>2</sup>.**

**1.5FE Central Store – 8.0m<sup>2</sup> required. Acceptable as is.**

**Existing General Teaching Stores – various sizes across the existing.**

**1.5FE General Teaching Stores - 1.5m<sup>2</sup> which you would expect to provide with each reconfigured Key Stage 1 and new Key Stage 2 Classroom.**

**Existing PE Stores – 8.2m<sup>2</sup> associated internally with the Hall, 8.2m<sup>2</sup> external to Playground.**

**1.5FE PE Stores – 18.0m<sup>2</sup> required. Acceptable as is.**

**Existing Dining Furniture Store – 8.7m<sup>2</sup>.**

**1.5FE Dining Furniture Store – 16.0m<sup>2</sup> required. Assume the Multi-use circulation possibly has stacked Tables? Arguably the Table and Chair store has been repurposed as the Curriculum Store? Needless to say, there is sufficient storage overall. Acceptable as is.**

**Existing School / Community Store – Again, a lot of storage available already even if not called Community Store.**

**1.5FE School / Community Store – 4.0m<sup>2</sup> required. Acceptable as is.**

**Existing Caretakers Room / Utilities, Material & Equipment Store – 9.6m<sup>2</sup> Site Cleaner, 6.9m<sup>2</sup> Site Cleaner, and 7.6m<sup>2</sup> Premises Managers Store to the Changing Rooms Building.**

**1.5FE Caretakers Room / Utilities, Material & Equipment Store – 7.0m<sup>2</sup> required. Acceptable as is.**

**Existing Cleaners Cupboard - 9.6m<sup>2</sup>.**

**1.5FE Cleaners Cupboard - 1.5m<sup>2</sup> + 1.5m<sup>2</sup> additional required to Key Stage 2 new build over 2 storeys.**

**Existing FS Storage – Various sizes.**

**1.5FE FS Storage – Would be met from what is already within the existing spaces.**

**Existing Pupil and SEN Cloaks – Various sizes.**

**1.5FE Pupil and SEN Cloaks – Would be met from what is already within the existing spaces and part of the new build 62.0m<sup>2</sup> Key Stage 2 Classrooms.**

## **WC's**

**Existing Pupil and Staff WC's – Various sizes.** WC Provision for Staff and pupils would appear adequate for the required numbers in the existing Foundation Stage and main School Block. The overall number of classrooms would not increase in the main block accommodation.



**1.5FE Pupil and Staff WC's – New WCs for both pupils and staff to account for Key Stage 2 Block.** Obviously, the new Key Stage 2 Block would require Male and Female pupil WC's and Accessible WC's that could double for staff use, split between the Ground and First Floor. Key Stage 2 Block - You would look to stack 4no Unisex WCs, plus an Accessible WC on each floor to serve the numbers.

**Existing Hygiene Room –** There does not appear to be a Hygiene Room or even Doc M pack layout to the Foundation Stage? Only a nappy Changing Room area off the Nursery Classroom. The closest provision is an accessible WC off the Lobby.

**1.5FE Hygiene Room – 9.0m<sup>2</sup>** required. Conceivably, the current setup works acceptable as is possibly. There is no actual Hygiene Room, but the works to the Nursery could include one if considered appropriate? None is shown at present.

### **Production Kitchen, Plant & Lift**

**Existing Production Kitchen – 37.6m<sup>2</sup>, plus Kitchen Store - 7.8m<sup>2</sup>, plus Dry Goods - 3.5m<sup>2</sup>.**

**1.5FE Production Kitchen – 60.0m<sup>2</sup>** required. It would need to be deduced whether the existing Kitchen could accommodate the increasing pupil numbers at its current size but at **48.9m<sup>2</sup>** overall there is a decent amount of space if it required reorganising. Conceivably, there is also a very large Kitchen Changing Room of **6.3m<sup>2</sup>** that could be reduced and partially made into Storage that might further help the main Kitchen area. If necessary, there is the possibility of extending the kitchen to the north side if required, but further study in terms of capacity would be needed? None is shown at present.

**Existing Plant Room – 37.6m<sup>2</sup>.**

**1.5FE Plant Room -** Would continue to be utilised for the existing building. NZC considerations would need to be taken on board as part of the proposals. The new Key Stage 2 block would need its own Plant Room – **18.0m<sup>2</sup>** estimated required.

**Passenger Lift –**You would need a passenger Lift in the New Build Key Stage 2 Building if it were 2 storey, with emphasis on passenger lift rather than a platform lift which would no longer meet the requirements.

### **3.7 PROS OF NEW BUILD SOLUTION AND ALTERATIONS TO EXISTING**

- Overall, the solution should be to limit the amount of remodelling and refurbishment works required to the existing building. Where feasible if younger pupils can simply be moved into existing classrooms as with the Foundation Stage and 1no existing Key Stage 1 Classroom with the most limited of changes then that is what should be done. The majority of work required to the existing building obviously needs to be programmed around the summer vacation.
- Isolating the 6no Key Stage 2 block as a standalone building offers the least disruption to the running of the existing school. Conceivably either two or at least one of the temporary blocks will be retained during the construction, but the position of the new building to the north-west of the existing school would allow contractor access, whilst limiting too much invasiveness with the existing day to day school activities.

- Whilst a Section 77 application would be required on the basis of building on the existing Hard and Soft Informal and Social Area, replacing the two temporary blocks with an equivalent permanent building footprint of a similar size, should make the application more straightforward.
- Both the site and buildings are OCC owned, but for completion of review both proposals will require OCC Estates to be engaged at the commencement of the Feasibility Study.

### **3.8 CONS OF NEW BUILD SOLUTION AND ALTERATIONS TO EXISTING**

- Functionally, the school accommodation is split between two separate buildings which does not necessarily help day to day use and transfer between the main building and the new teaching block, particularly in poor weather. Then again, it is not unusual in a Primary setting.
- Positioning of the New build Block needs to consider surveillance and views of the existing playing field and if possible, retaining that outlook.

### 3.9 PROPOSED SCHEDULE OF ACCOMMODATION

The following Schedules of Accommodation provide details of the works required to provide the necessary alterations to the existing school building along with the new build accommodation to achieve a 1.5FE School.

<b>New build Key Stage 2 Accommodation Schedule</b>	<b>Unit Area m<sup>2</sup></b>	<b>Total Area m<sup>2</sup></b>	<b>Comments</b>
6no Key Stage 2 Classrooms & integral Cloaks	62.0	372.0	Includes cloaks and a resource area integral to classroom. 3no Classrooms to Ground Floor, 3no Classrooms to First Floor.
6no Classroom Stores	1.5	9.0	Double doored directly off of Classroom
1no Group Room	14.7	14.7	To Ground Floor. A second group Room OR SEN Group Room could be accommodated to First Floor reducing the oversized Food Bay.
1no Staff Kitchenette	7.6	7.6	To Ground Floor, necessary as no other facilities close at hand.
1no Staff Workroom / Central Storage	7.6	7.6	Inclusion of resource provisions, workspace, and MFD.
1no Food Bay	33.8	33.8	Replacing provision in temporary.
2no Cleaners Stores	1.6	3.2	One to Ground Floor and One to First Floor.
2no Multi-Purpose Stores	2.5	5.0	Under Stair Room usage.
Passenger Lift	2.8	5.6	Platform lift not acceptable
<b>Total Net Area</b>		<b>458.5m<sup>2</sup></b>	
Circulation/ Partitions/ Stairs and Plant	220.5	220.5	
2no Accessible WC's	4.4	8.8	
6no Standard WC's	1.6	9.6	
2no Ambulant WC's	2.3	4.6	
<b>Total Gross Area</b>		<b>702.0m<sup>2</sup></b>	

<b>Remodelling Internal Alterations Accommodation Schedule</b>	<b>Unit Area m<sup>2</sup></b>	<b>Total Area m<sup>2</sup></b>	<b>Comments</b>
1no. 0052 KS01 classroom	74.4	74.4	Smaller classroom area and ICT Classroom amalgamated to provide KS01 General Teaching Classroom inclusive of storage. Partition between Classrooms removed. Folding partition to resources removed and door and screen inserted
1no. 0059 KS01 Resource Area	40.0	40.4	KS02 shared space becomes central shared space / resource area between KS01 Classrooms.

1no. 0046 KS01 classroom	62.4	62.4	Existing KS02 Classroom, Cleaners Store and Central Store amalgamated to form KS01 General Teaching Classroom inclusive of storage.
1no. Circulation Route to back of 0046 KS01 classroom	9.3	9.3	Circulation Route to back of KS01 Class through to Shared Resources so northern most classroom does not need to circulate through 0046 Classroom space.
0060 Kitchen Expansion	20.0	20.0	Possible Kitchen expansion by a further 20m <sup>2</sup> on the basis the existing Kitchen area cannot accommodate the required serving given the increase in pupil numbers? Possible given the existing Changing Room, there could be some remodelling to Kitchen Storage and the Kitchen itself could be expanded within the current area?
<b>Total Remodelled Gross Area</b>		<b>206.5m<sup>2</sup></b>	

#### **4.0 ESTIMATED COSTS**

A high-level cost estimate for the proposals using the attached sketch scheme drawings has been produced.

The breakdown of the estimated costs for carrying out the required work is:

##### **Mill Lane ICPCC – Total forecast budget of £4.7m @ 2Q2025.**

Please note:

- No sprinkler allowance has been included in the standalone building. It is under the 1500m<sup>2</sup> minimum floor area to require Sprinklers and the existing school does not have sprinklers.
- An FF&E allowance has been included.
- The standard allowances for external works, fees and contingencies have been included.
- Several abnormals including glazed canopies, passenger lift and play equipment has been included.
- This Option Appraisal looks at a new standalone block with 6no Classrooms over two storeys inclusive of Storage, Cloaks, Group Room, Food Bay, Staff Kitchenette, WC facilities, passenger lift, 2no Staircases and Circulation, along with the remodelling of the existing school areas to provide compliant Classroom and other teaching facilities.
- Both temporary buildings currently on the site would be removed as part of the works to make way for the 6no Classroom Extension.
- A list of Assumptions and Exclusions can be found in the Cost Report.

## 5.0 RISKS REGISTER

There are a number of key project risk factors to consider:

Description of areas or sources of risk and impact on project	Mitigation	Owner
<b>Phasing of works</b> Due to the site constraints, any works will need to be phased to enable the school to continue to operate in its current environment. The remodelling of the existing building would need to be undertaken in the summer vacation to limit overall school disruption. At least one number temporary block would need to be removed as a result of the New 6 Class Block construction, which the school could conceivably do without, and which would be dependent on the exact positioning of the new build. If it were deemed both Temporary blocks needed removing to construct the new 6 class block, then pupils would need to be housed within the existing school and the Temporary Block relocated for the period of the construction.	Review of the buildings and site will need to be undertaken as soon as the Feasibility commences, and implications determined.  Conceivably, decanting of KS2 Years 3 & 4 from the existing building to the existing temporary building (Music & Art rooms) would help the first Phase (remodelling works). Then either demolish 1no Temporary to undertake the New Build, leaving the remaining block with pupils in, accepting the 6 Classroom block would be built closer to the south-west boundary than currently shown, OR relocate the second Temporary on site in order to allow the 6 class block to be built as shown.	Project Lead
<b>Below Ground services</b> Potential location of new permanent 6 Classroom Building may bridge existing drains, services feeds, etc.	Survey of existing services through GPR survey. Alternative locations of new class block to be explored, proposed solutions to be recommended	Project Lead
<b>Badger set</b> There is believed to be a badger set under the existing temporary building currently used to house Years 5 and 6. Badger sets are protected by law and mitigation action is required to ensure the sets are properly dealt with.	Commission survey report and mitigation plan followed by early review and discussions with Planners and appropriate consultants to determine be the implications of the works and the best mitigation plan.	Project Lead
<b>Cost estimate</b> The outline proposal has been costed without an agreed brief or a feasibility assessment being undertaken.  It should therefore be recognised that if there are any changes to the areas above or the identification of unfavourable ground condition or other abnormalities, then the costs will need to reflect as much.	Review of the buildings will need to be undertaken as soon as the Feasibility commences, and the resulting implications determined.	Project Lead

## **6.0 CONCLUSION**

This Option Appraisal concludes that the expansion of the school to 1.5 Forms of Entry is possible replacing the two temporary blocks and remodelling the current Key Stage 02 Classroom accommodation. As there are at least two locations where the new 6no Classroom building could be located, and this will affect how the 2no Temporaries are removed from site or in the case of at least 1no relocated in order to allow the new block to be constructed. The feasibility study will determine the location of the new classroom accommodation which will be tested and developed alongside the school.

There are a number of key risks (as set out above) that could affect both proposals, and these risks will need to be assessed as part of a rigorous feasibility study before more accurate costs and programme can be provided.

## 7.0 Appendix – Sketch Drawings



1001-MLP-OCC-SP-0 1007-MLP-OCC-SP-0 1006-MLP-OCC-SP-0 1005-MLP-OCC-SP-0 1004-MLP-OCC-SP-0 1003-MLP-OCC-SP-0  
0-DR-A-EXISTING SITE 1-DR-A-PROPOSED F10-DR-A-PROPOSED G0-DR-A-PROPOSED G0-DR-A-PROPOSED G0-DR-A-PROPOSED SI



1002-MLP-OCC-SP-0  
0-DR-A-EXISTING GR



# Response 7: Rectory Homes



Email to: [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)

Planning Policy

South Oxfordshire District Council

Abbey House

Abbey Close

Abingdon

OX14 3JE

25<sup>th</sup> October 2023

Dear Planning Policy,

## **CHINNOR NEIGHBOURHOOD PLAN REVIEW II (2011-2035) – CONSULTATION DRAFT**

We write in response to the consultation on the emerging Review II of the Chinnor Parish Neighbourhood Plan 2011 - 2035 in the hope you find our comments constructive and helpful as the plan progresses towards being 'made'.

### *Planning Policy Context*

We acknowledge that Chinnor has already exceed its target of 15% growth over the Plan period (2011 – 2035) of the adopted South Oxfordshire Local Plan 2035 and therefore further significant development within the village is not needed, unless substantial changes to local or national planning policy indicate otherwise. We do, however, consider there to be an opportunity within the review of the Chinnor Neighbourhood Plan to cater to and accommodate more specific housing needs of the village which have not yet been delivered through the past completions or existing commitments.

We trust our comments below will help assist the Parish Council and NP Steering Group in realising these opportunities and providing a broader range of housing for all demographics, whilst having a Plan that is resilient to potential future planning policy changes.

Registered Office as below. Registered in England No. 2575047

**rectory.co.uk**

Rectory Homes Limited, Rectory House, Thame Road, Haddenham, Buckinghamshire HP17 8DA

Telephone: 01844 295100 Email: [sales@rectory.co.uk](mailto:sales@rectory.co.uk)

## *Housing Need*

There are numerous references within the emerging Neighbourhood Plan Review II to specific housing needs within the village. Objective 1 of the Plan states *'To ensure that new residential developments will directly address the future needs of all residents in the Plan area in general, and to provide for the needs of young and elderly people in particular.'*

Under 'Local Housing Survey', paragraph 4.7 states *'Whilst Chinnor has grown significantly in the last fifty years, it has retained a strong sense of community spirit and cohesion. In this context many residents who moved to the village in the 1970s to 1990s are now both older and in need of smaller or more specialist housing. Their children are also finding it difficult to find appropriately sized or priced housing in the village.'*

Furthermore, paragraph 4.17 states *'Demographic changes indicate that there is an increasing need for housing provision for the elderly in Chinnor. Between 2001 and 2011 the number of residents in Chinnor aged 65 and over doubled. Whilst many residents are content to continue into retirement in their current homes, others seek alternative housing in the village with needs falling into three general categories.'* One such category relates to *'Homes for those who wish to downsize and for surviving partners. The stock of smaller houses has been reduced as many have been extended. There is a need for two-bedroom, high specification dwellings, mainly single storey and with modest gardens.'*

The above statements demonstrate a clear need in the village specifically for two types of housing: 1) Smaller retirement homes and downsizer properties for elderly people such as bungalows; and 2) smaller, starter homes for first time buyers. This housing need exists despite Chinnor exceeding the housing requirement within the adopted South Oxfordshire Local Plan 2035.

In order to address this identified housing need, we suggest consideration is given to the allocation of housing sites to deliver smaller, retirement homes for older people. Such sites should be either located within

the proposed settlement boundary or on sites that adjoin the existing settlement boundary and built edge of the village to ensure they are sustainably located – within easy relative walking distance of village amenities and services.

In terms of addressing the need for smaller homes for first time buyers, it is our view that this could be best addressed through provide a more specific housing mix requirement within Policy CH H3. Our comments on this policy are as follows.

#### *Policy CH H3 – Tenancy Mix*

This policy is considered to be ineffectual due to the lack of elaboration on the housing needs referred to within the policy. We assume the purpose of the policy is ensure new proposals for residential development refer to and are guided by the latest housing needs assessment available, in order to provide a mix of housing to the village which is appropriate and required at the time the application is submitted. If this is the case, the policy should be re-worded to clarify this and state specifically 'the housing mix of proposals for new residential development should be based on the latest available village housing needs assessment'.

Furthermore, the policy is titled 'tenancy mix', without providing examples of various forms or types of tenancy which should be sought. The is key, as it goes right to the heart of the policy's intention. Is the intention to require a mix of dwellings in terms of bedroom numbers, in which case the word 'tenancy' is misleading, or is the intention of the policy to be adaptive to emerging housing needs in terms of occupancy such as retirement housing, starter homes etc? Equally, if the intention of the policy is instead to just determine the tenancy split of the affordable housing provision (i.e. ratio of social rented properties to intermediate and shared ownership units) then this should be clarified as such. We suggest Policy CH H3 is re worded to resolve the above ambiguities.

As mentioned earlier within these representations, to address the need for more smaller starter homes for first time buyers, Policy CH H3 could be more specific in its requirements to help steer development proposals towards the delivery of more small homes

#### *CH H5 – Retirement Housing*

We support the inclusion of a policy specifically related to retirement housing given the increasing ratio of older people within the village. As stated previously, we suggest that the policy could be best addressed by allocating specific sites for retirement housing in sustainable locations which could directly facilitate the provision of this specialist form of housing. This way, there is greater certainty that retirement housing would be delivered to provide accommodate for this increasing demographic.

#### *Policy CH H7 – Development Boundary*

Whilst we are supportive of establishing a development boundary for the village, we consider the boundary as indicated in Figure 2 of the emerging NP has been drawn too tightly and offer's little scope for accommodating further growth if considered necessary over the Plan period. This also means that some sites which could provide for more specialist forms of housing such as retirement homes or starter homes (see our comments in relation to policy CH H5 above) are excluded when they could provide for a specific housing need within the village.

#### *Other opportunities*

Rectory Homes are in control of the site at Golden Hills. The site was assessed through the SHELAA as part of the evidence base to the now adopted South Oxfordshire Local Plan 2035 under two references – 842 and 1362, as two separate parcels of land. The previous assessments under the SHELAA confirmed that the site is suitable for further consideration, is available for development and is achievable. Rectory Homes retains an interest over the entire site confirming it remains available for development.

We consider that the site could make a valuable contribution to certain housing requirements which are not met by the historic completions or existing commitments in the village. The site adjoins the existing built form at Golden Hills and is bound to the south by the recreation ground. It has no notable physical constraints to development and is has no planning policy designation which would restrict development of the site. It would therefore form a logical

extension to the village, providing a new pedestrian link through the site to the rec. ground which would better integrate the rec. ground with the settlement and make it more easily accessible to the residents of Chinnor.

The existing homes along Golden Hills comprise, in majority, bungalows, with a few two-storey dwellings located at the western and northern ends of the road. As such, any development of the site would likely comprise exclusively of bungalows given the prevalence of built form in the area and the site's edge of village location. These bungalows would be ideally suited as retirement housing for downsizers or those with limited mobility that would prefer all-on-one-floor living. Given the identified need for and support for retirement housing within the emerging Neighbourhood Plan, this site could provide the perfect opportunity to deliver housing which caters to these objectives on a sustainable site, a short walk from village amenities.

The Neighbourhood Plan Review II mentions that crime in Chinnor is higher *'than might be expected'* with statistics to show the crime in the village exceeds the average across South Oxfordshire. Whilst the exact types of crime experienced in the village are not specified within the Neighbourhood Plan, Rectory Homes understands there is an on-going issue in this area of the village with vehicle theft and vandalism to the east of the site along a very popular walking route and adjoining recreation space.

In addition, the walking route to the Ridgeway involves walking along Hill Road or crossing the road and ascending steps through the recreation ground. The recreation ground is identified as 'Local Green Space 3' within the Neighbourhood Plan and the Plan confirms *'it is extensively used both as a formal recreation area and as an informal play area.'* There is no safe level access to the Ridgeway or recreation ground from the village. The current informal parking arrangement on the Ridgeway has no natural surveillance or security for vehicles from residents and visitors wishing to access the Chilterns AONB or recreation ground.

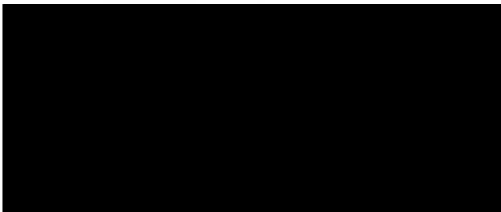
As a response to the existing issues with parking in beauty spots, a new car parking area could be located on this site to be delivered alongside a sensitively designed small-scale

residential development. The new car park would be for people walking the ridgeway and other walking routes in the local area and those using the recreation ground. This will provide a tangible benefit in the form of a new, safe, level pedestrian link through the site to the recreation ground which would provide better integration with the settlement and make it more easily accessible to residents and visitors to Chinnor. The car park would also be overlooked by the new dwellings resulting in natural surveillance and reducing the potential for anti-social behaviour.

We trust these comments will help progress the review II to the Chinnor Neighbourhood Plan and will be afforded due consideration as the Plan proceeds to examination.

In the mean time, if you would like to discuss any of the points raised above, please feel free to contact me on the details below.

Regards,



**Associate Planning Director**

**Direct Dial: 01844 295361**

**Email: [REDACTED]@rectory.co.uk**



# Response 8: Oxfordshire County Council

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

**District:** South Oxfordshire

**Consultation:** Chinnor Neighbourhood Plan 2011-2035 (Submission Version)

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**Annexes to the report contain officer advice.**

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### **Overall View of Oxfordshire County Council**

Oxfordshire County Council supports the ambition of Chinnor Parish Council to prepare a neighbourhood plan and would like to thank the Parish Council for giving the County Council the opportunity to provide comments.

**Officer's Name:** [REDACTED]

**Officer's Title:** Planner

**Date:** 26 October 2023

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**ANNEX 1**  
**OFFICER ADVICE**

**District:** South Oxfordshire

**Consultation:** Chinnor Neighbourhood Plan 2011 – 2035 (Submission Document)

**Team:** Strategic Planning

**Date:** 26 October 2023

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## **Strategic Comments**

Following the County Council comments made to the Pre-Submission consultation in September 2023 there are additional comments on pages 5 & 6 made by Education Pupil Place Planning regarding the Neighbourhood Plan Final Submission consultation version.

Policy CH GP1 Local Green Space identifies several green spaces, however, some of these areas fall within Highway land, therefore this status takes precedent when any future highways works are required. Following OCC's response to the Chinnor Neighbourhood Plan Pre-Submission consultation, the Parish Council suggested the wording below to be included to recognise parts of the green space areas that fall within County Council Highways Land:

*"Where there is overlap to the Green Spaces outlined and Highway land, it is noted that OCC, as the relevant Highway Authority, have legal precedence over the rights of the sub soil owner and no works can take place without their approval"*

**We welcome the inclusion of this wording in the final version but would suggest it is included within the policy wording for Policy CH GP1 – Local Green Spaces on page 59 by adding the wording at the bottom of the policy (rather than in the supporting text above the policy), for example:**

### **POLICY CH GP1 - LOCAL GREEN SPACE**

THE SITES LISTED IN THE TABLE AND PLANS BELOW ARE DESIGNATED AS NEW LOCAL GREEN SPACES.

- 1 CHINNOR ALLOTMENTS, OFF STATION ROAD
- 2 PLAYING FIELDS TO THE EAST OF STATION ROAD
- 3 HILL ROAD RECREATION AREA, REGISTERED AS THE VILLAGE GREEN
- 4 OLD KILN LAKES OPEN SPACE AND PLAY AREA
- 5 WHITE'S FIELD, OFF MILL LANE
- 6 ST. ANDREW'S ROAD PLAY AREA
- 7 TWO OPEN SPACES WITHIN VAN DIEMENS CLOSE
- 8 HAYLEY CROFT
- 9 ESTOVER WAY OPEN GREEN
- 10 ESTOVER WAY BALANCING POND AND WILDLIFE AREA
- 11 LAND BEHIND GREENWOOD AVENUE
- 12 HENTON VILLAGE GREEN (WITHIN THE PARISH OF CHINNOR)
- 13 OLD ORCHARD AT THE JUNCTION OF DONKEY LANE AND THE RAILWAY LINE
- 14 GREENWOOD MEADOW OPEN GREENS
- 15 MEMORIAL GARDEN (KEENS LANE WHERE IT MEETS THE AVENUE)
- 16 MILL LANE COMMUNITY GARDEN

Where there is overlap to the Green Spaces outlined and Highway land, it is noted that Oxfordshire County Council, as the relevant Highway Authority, have legal precedence over the rights of the sub soil owner and no works can take place without their approval.

Transport Development Control wish to highlight the parking standard quoted in Appendix 3 – Design Guidance on page 126 (off-street car parking shall be provided for a minimum of two cars) does not accord with the recently adopted OCC parking standards which can be found [here](#).

The amendment requested by archaeology in our pre-submission comments has been taken forward which is welcomed.

**District:** South Oxfordshire

**Consultation:** Chinnor Neighbourhood Plan 2011 – 2035 (Submission Document)

**Team:** Access to Learning

**Officer's Name:** [REDACTED]

**Officer's Title:** Pupil Place Planning

**Date:** 16/10/23

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## **Education Comments**

As noted in the Plan, Chinnor has experienced increased demand for school places as a result of recent housing completions, despite recent falls in the general birth rate. There has already been some expansion of primary school capacity, at St Andrew's CE Primary School, with recent assessment into whether further expansion at Mill Lane Primary School is viable. Secondary school capacity serving the area has also been expanded (at both Icknield Community College and Lord Williams's School). Early Education capacity is provided by a mixed market of private, voluntary and independent providers as well as primary schools, and is being reviewed in the light of the latest government policies regarding early years entitlements.

The county council welcomes the commitment in the Neighbourhood Plan to support future proposals for the expansion of existing schools and early years capacity.

Comments on specific paragraphs.

9.3 *"Mill Lane is already at capacity (211 pupils as at October 2022) and does not have the capacity to go to a 45 pupil (1.5 Form Entry) school without substantial building work. The school currently uses three temporary buildings (constructed in the 1990's) which cannot accommodate class sizes larger than 30. The toilet and changing facilities are old, inadequate and do not meet health and safety requirements. Part of the school site has problems with flooding in times of heavy rain. The county council have committed to a capital project to replace the temporary classrooms with permanent accommodation with no increase to capacity."*

The final sentence could be misleading, perhaps implying that the county council has ruled out increasing capacity. Could it perhaps be amended to:

*"The county council at this stage have committed to a capital project to replace the temporary classrooms with permanent accommodation, which would not increase capacity."*

You correctly state that significant building work would be needed to expand the school. Based on the scale of housing included in the Neighbourhood Plan, the county council's assessment is that expansion would not be sustainable. Although there has been over-subscription for primary school places in 2023, this is currently forecast to be the peak year for demand, and a further 0.5 form of entry would create surplus capacity in the area.

Should there be significant housing approved in addition to that indicated in the Neighbourhood Plan, based on current data this would be expected to require expansion of Mill Lane Primary School.

9.4 *“The facilities and conditions in both schools are becoming an issue with increasing pupil numbers. St Andrew’s was due to be demolished and rebuilt in 2010 (planning permission granted, funding in place) but funding was cut in the 2010 Government Spending Review. St Andrew’s lacks a Sports Hall appropriate in size to meet the requirements for Key Stage 2 Physical Education. Mill Lane School is teaching Key Stage 2 pupils in outdoor huts.”*

We remain concerned at the implication that St Andrew’s is lacking in hall capacity. St Andrews has two halls: although both are slightly under the DfE recommended (non-statutory) size of 140m<sup>2</sup>, at 132m<sup>2</sup> and 133m<sup>2</sup> the shortfall would not hinder curriculum delivery to any significant extent. It is noted that since the cancellation of the rebuild, OCC has invested in the school’s buildings to address backlog repair and maintenance issues. As stated above, the county council has now committed to replacement of Mill Lane’s temporary buildings.

9.9 *“The increase in children at primary school in Chinnor will have an impact on demand for places at secondary schools in the area. There is a clear, unanimous view between all Chinnor parties that an urgent new review by Oxfordshire County Council of the places and facilities available at the preschools and primary schools in Chinnor has to be carried out, taking into account the Neighbourhood Plan proposals. This issue is discussed further in Section 10 - Actions for Chinnor Parish Council, paragraphs 10.3 and 10.4.”*

The sufficiency of education provision is kept under constant review by the country council. This includes monitoring of housing development proposals, and annual recalculations of pupil number forecasts.



**District:** South Oxfordshire

**Consultation:** Chinnor Neighbourhood Plan 2011 – 2035 (Submission Document)

**Team:** South & Vale Locality Team

**Officer's Name:** [REDACTED]

**Officer's Title:** Transport Planner

---

## **Transport Comments**

Transport Development Control wish to highlight the parking standard quoted in Appendix 3 – Design Guidance on page 126 (off-street car parking shall be provided for a minimum of two cars) does not accord with the recently adopted OCC parking standards which can be found [here](#).

**District:** South Oxfordshire

**Consultation:** Chinnor Neighbourhood Plan 2011 – 2035 (Submission Document)

**Team:** Property

**Date:** 26/09/2023

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## **Property Comments**

OCC Property have reviewed the contents of the draft reviewed version of the Chinnor Neighbourhood Plan and have determined that the changes that are being proposed will not have an unwanted effect to OCC land that is located within the Neighbourhood Plan Area.

**District:** South Oxfordshire

**Consultation:** Chinnor Neighbourhood Plan 2011 – 2035 (Submission Document)

**Team:** Archaeology

**Date:** 16/10/23

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## **Archaeology Comments**

The updated Neighbourhood Plan now contains a suitable policy for heritage assets, and we have no further comments.

# Response 9: Marine Management Organisation

**From:** [SM-MMO-Consultations \(MMO\)](#)  
**To:** [Planning Policy S&V](#)  
**Subject:** Consultation response- PLEASE READ  
**Date:** 13 September 2023 15:05:32

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**\*\*EXTERNAL\*\***

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

Kind regards,  
The Marine Management Organisation

### **Marine Management Organisation Functions**

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

### **Marine Planning and Local Plan development**

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

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

[checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

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

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

### **Marine Licensing and consultation requests below MHWS**

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

### **Consultation requests for development above MHWS**

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

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

## **Minerals and Waste Local Plans and Local Aggregate Assessments**

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

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

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

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

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