

Shrivenham Neighbourhood Plan - publicity period

Response 1

Respondent Details

Information	
Respondent Number: 1	Respondent ID: 124000964
Date Started: 07/08/2019 15:07:23	Date Ended: 07/08/2019 15:23:41
Time Taken: 16 mins, 18 secs	Translation: English
	Country: United Kingdom

Contact Details
Name Ms Lankester
Email planning@oxnet.nhs.uk

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Thank you for asking the Oxfordshire Clinical Commissioning Group (OCCG) to comment on the Shrivenham NDP 2018/ 2031. The OCCG commissions health services to all those who are registered with an Oxfordshire GP. For Shrivenham we note the majority of your community would receive primary care health facilities from the Swindon CCG. However, your NDP has been written well and makes pertinent mention of the health needs of the community and how they could be supported. Of particular note is the recognition of mental health issues, and the cost of health generally, and how this can be supported by healthy environments and design. The main concern across the South and Vale areas is the unprecedented housing growth bringing more pressure on already stretched health services. We would ask that the local planning authority and developers consider how developments will impact on services and how these could be mitigated. The CCG are working closely with both South and Vale Councils and we understand that primary care could potentially receive funding under the Community Infrastructure Levy process to aid estate development of local GP practices. If we can provide any further information please do let us know.</p>

Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Shrivenham Neighbourhood Plan:</p>
No, I do not request a public examination

Your details and future contact preferences

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

Title	Mrs
Name	Julie-Anne Howe
Job title (if relevant)	Locality Co-ordinator
Organisation (if relevant)	Oxfordshire Clinical Commissioning Group
Organisation representing (if relevant)	-
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Postcode	OX4 2LH
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Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

Yes I would like to be notified

Response 2

Respondent Details

Information	
Respondent Number: 2	Respondent ID: 126336063
Date Started: 05/09/2019 10:38:19	Date Ended: 05/09/2019 10:44:45
Time Taken: 6 mins, 26 secs	Translation: English
	Country: Unknown

Q1. Are you completing this form as an:
Individual

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>I support the Shrivenham Neighbourhood Plan. It is a sensible and realistic plan that looks to the future but strives to retain the nature and culture of Shrivenham which is extremely important to the residents of Shrivenham. I urge the Vale of the White Horse District Council to endorse the plan.</p>

Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Shrivenham Neighbourhood Plan:</p>
Don't know

Your details and future contact preferences

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

Title	Mr
Name	John Gregory
Job title (if relevant)	-
Organisation (if relevant)	-
Organisation representing (if relevant)	-
Address line 1	
Address line 2	-
Address line 3	-
Postal town	
Postcode	
Telephone number	
Email address	

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

Yes I would like to be notified

Response 3

Respondent Details

Information	
Respondent Number: 3	Respondent ID: 126433834
Date Started: 06/09/2019 11:19:03	Date Ended: 06/09/2019 11:28:44
Time Taken: 9 mins, 41 secs	Translation: English
	Country: Unknown

Q1. Are you completing this form as an:
Individual

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>I support the Shrivenham neighbourhood plan as it addresses the future housing requirements while retaining the character of the village. It also recognises the importance of the rural setting of the village which is beneficial to the well being of the community. Health benefits of green and open spaces are now well established.</p>

Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Shrivenham Neighbourhood Plan:</p>
No, I do not request a public examination

Your details and future contact preferences

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

Title Miss

Name Allison Harland

Job title (if relevant)

Organisation (if relevant)

Organisation representing (if relevant)

Address line 1

Address line 2 -

Address line 3 -

Postal town

Postcode

Telephone number

Email address

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

Yes I would like to be notified

Response 4

Respondent Details

Information	
Respondent Number: 4	Respondent ID: 127363335
Date Started: 18/09/2019 08:37:22	Date Ended: 18/09/2019 08:47:56
Time Taken: 10 mins, 34 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Agent

Your comments

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

<p>Q3. You can upload supporting evidence here.</p>
<ul style="list-style-type: none">File: Shrivenham NP REP 10.09.19.pdf - Download

Your details and future contact preferences

VOWHDC's office
35 Eastern Avenue
Milton Park, Milton
OX14 4SB

Lucy Bartley
Consultant Town Planner

Tel: 01926 439116
n.grid@woodplc.com

Sent by email to:
Planning.policy@whitehorsedc.gov.uk

10 September 2019

Dear Sir / Madam

Shrivenham Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.



Electricity Distribution

The electricity distribution operator in Vale of White Horse District Council is SSE Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.

Lucy Bartley
Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

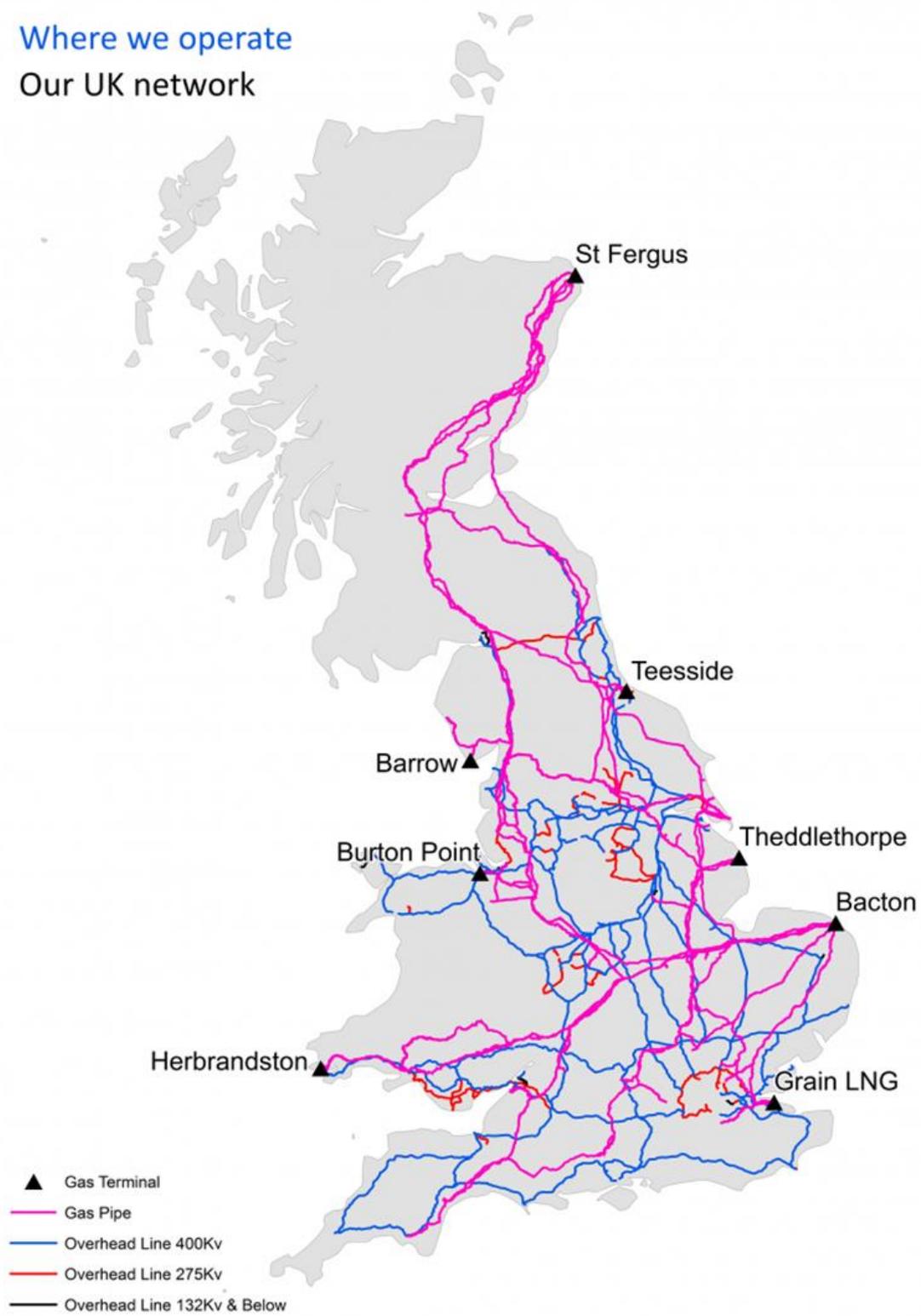
Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate

Our UK network



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Title	-
Name	Lucy Bartley
Job title (if relevant)	Consultant Town Planner
Organisation (if relevant)	Wood E&I Solutions UK Ltd
Organisation representing (if relevant)	National Grid
Address line 1	Nicholls House
Address line 2	Homer Close
Address line 3	Leamington Spa
Postal town	Warwickshire
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Email address	n.grid@woodplc.com

Response 5

Respondent Details

Information	
Respondent Number: 5	Respondent ID: 127910544
Date Started: 26/09/2019 12:29:59	Date Ended: 26/09/2019 12:48:58
Time Taken: 18 mins, 59 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Individual

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Land Claylands Farm, Station Road, Shrivenham</p> <p>We wish to confirm our interest in keeping Claylands Farm, Station Road, Shrivenham within the neighbourhood development plan boundary.</p>

Your details and future contact preferences

<p>Q8. After the publicity period ends, your comments, name, email and postal address will be sent to an independent examiner to consider. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.</p>
Title -
Name A.G. Brickell
Job title (if relevant) -
Organisation (if relevant) -
Organisation representing (if relevant) -
Address line 1
Address line 2
Address line 3
Postal town
Postcode
Telephone number
Email address

Response 6

Respondent Details

Information	
Respondent Number: 6	Respondent ID: 127911930
Date Started: 26/09/2019 12:50:29	Date Ended: 26/09/2019 12:56:21
Time Taken: 5 mins, 52 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.
<p>The Wilts & Berks Canal Trust is pleased to see the recognition given in the draft Shrivenham Neighbourhood Plan to the Wilts & Berks Canal, its towpath and the adjacent Pocket Park. The Trust, and in particular its local branch, has striven for many years to restore the canal and create a biodiverse corridor and green space for the benefit of the community. The references to the Wilts & Berks Canal as a heritage asset, civic amenity and important landscape feature are noted.</p> <p>The Trust supports the inclusion of the pocket park and adjacent towpath in the defined Green Spaces under policy LC5.</p> <p>The Trust also notes just one error in the submission version of the neighbourhood plan in paragraph 1.2.5.5 where the canal is referred to incorrectly as the North Wiltshire Canal instead of the Wilts & Berks Canal.</p> <p>The Trust has recently embarked on a restoration project in the Pocket Park which focuses on improving biodiversity and will also improve its value to the community. The Trust is ready to extend such work to other lengths of the waterway and towpath when access can be gained.</p> <p>The Trust looks forward to a continuing positive relationship with the Shrivenham Parish Council as it continues to restore and improve this wonderful asset.</p>

Your details and future contact preferences

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

Title	-
Name	Rod Hacker
Job title (if relevant)	Head of Planning, Executive Board
Organisation (if relevant)	Wilts & Berks Canal Trust
Organisation representing (if relevant)	-
Address line 1	Dauntsey Lock Canal Centre
Address line 2	Dauntsey Lock
Address line 3	Dauntsey
Postal town	Wilts
Postcode	SN15 4HD
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Response 7

Respondent Details

Information	
Respondent Number: 7	Respondent ID: 128169691
Date Started: 01/10/2019 12:02:29	Date Ended: 01/10/2019 12:11:39
Time Taken: 9 mins, 10 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

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

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: 2019-09-30 District Council response for Shrivenham.pdf - Download

Public examination

<p>Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Shrivenham Neighbourhood Plan:</p>
No, I do not request a public examination

Your details and future contact preferences

Planning services

HEAD OF SERVICE: ADRIAN DUFFIELD



Contact officer: Deborah Bryson
deborah.bryson@southandvale.gov.uk
Tel: 01235 422600

135 Eastern Avenue
Milton Park
Milton
OX14 4SB

1 October 2019

Shrivenham Neighbourhood Plan – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

Vale of White Horse District Council has worked to support Shrivenham Parish Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Shrivenham Neighbourhood Plan during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed some of the concerns previously raised, although there are some outstanding points.

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

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

DBryson

Deborah Bryson
Senior Planning Policy Officer (Neighbourhood)

Please note the **yellow highlighted** text shows our recommended changes to the text.

Ref.	Section/Policy	Comment/Recommendation
1.	<i>General Comment</i>	The document references the 2018 NPPF, whereas the government published a revised version in 2019 and it is this version the plan will be assessed against. We recommend the plan should be updated so that it refers to 2019 throughout.
2.	<i>General Comment</i>	There is a lot of repetition between policies and/or similar policies (particularly between housing, design and landscape/views) with overlapping requirements.
3.	<i>Policy DS1: Settlement Gaps (page 39)</i>	<p>The principle of gaps is in accordance with Core Policy 29. However, the areas identified are large in scale and it is unclear if these are suitable.</p> <p>The Landscape Character Assessment identifies that development should be avoided in LCA6 (gap between Watchfield and Shrivenham) to prevent coalescence, however it is not clear what evidence has been used for the other gaps (ie LCA 9, 12 and 13).</p>
4.	<i>Policy H1: General requirements for development (page 41)</i>	<p>Some of the key terms within the policy are not clearly defined.</p> <p>Criteria 2 & 3 – the village and landscape character assessments form part of the evidence base. Currently the criterion states that development should plan, manage, protect, preserve and enhance the distinctiveness of the character areas and the character and appearance of the village as defined/described by the village and landscape character assessments. The policy is likely to benefit from an amendment to say that development should 'have regard' to the village and landscape character assessments</p> <p>Criterion 5 – it may be helpful to clarify whether this relates to the highlighted views in the evidence base documents. Also the criterion refers to 'no detrimental impact', we would suggest 'no significant detrimental impact'.</p> <p>Criterion 7 – it is unclear how it is intended that this is demonstrated.</p>

Ref.	Section/Policy	Comment/Recommendation
		It is not clear whether development is supposed to meet each of the requirements, or just some of them.
5.	<i>Policy H2: Housing Mix (page 42)</i>	The neighbourhood plan policy includes unnecessary repetition of Core Policy 26.
6.	<i>Policy H3: Sites within the built-up area (page 42)</i>	Definition of some terms is lacking. Where there is reference to important gaps or local views, it may be helpful to refer to these where they are highlighted in the evidence base.
7.	<i>Policy H4: Preferential access to housing (page 43)</i>	Developments on any site in the Vale of White Horse area have to meet the need of the whole district, unless the site is a rural exception site where consideration will be given to a specific housing need. The Housing allocations policy has a 20% requirement of allocation to people with a strong local connection to the parish. The policy and supporting text would benefit from reference to this aspect of the Housing Allocations policy. Our suggestion is that this should read “20% of all new Affordable Housing in Shrivenham provided by the plan will, on first lettings, be subject to a local connection to the Parish.”
8.	<i>Policy D1a: Design features for sites within the built up area (page 45)</i>	Some of the criteria within the policy are overly onerous without sufficient evidence to justify its basis. The policy should support innovative design rather than require all building meets all the requirements. For example, is it requiring that all development should have a pitched roof of no more than 2 storeys? If so, it would preclude other forms of development such as any contemporary design with an alternative roof form and potentially focal buildings of 2.5 storey. Whilst the Village Character Assessment sets out at paragraph 1.8.3 that “Steep pitched roofs, narrow gables and dormer windows are typical of the area.” It does not provide evidence that any other form of development would be inappropriate. The Village Character Assessment does not explain how the use of dormer windows would enhance or detract from the character of the village. We would suggest

Ref.	Section/Policy	Comment/Recommendation
		<p>that in terms of dormer windows it could be better to say 'may be acceptable'.</p> <p>It is suggested that the policy should be reworded such that support will be given to this form of development and other forms of development will need to be adequately justified.</p> <p>This policy would benefit from re-ordering such that it starts with "Weight will also be given to outstanding or innovative designs which..." and then to set out the principles which are anticipated unless otherwise justified.</p>
9.	<i>Policy D3: Provision of support for electric vehicles in new development, extensions and change of use (page 46)</i>	Without the sufficient evidence it may not be reasonable to require applications to deliver provision for charging electric vehicles when national policy asks that development should be designed to enable provision. Instead Policy D3 could encourage the provision.
10.	<i>Policy D4: Provision of Fibre to premises (page 47)</i>	The inclusion of 'and/or' is confusing. It is unclear whether the policy refers to residential development, employment development or both.
11.	<i>Policy P1b: Parking provision for new developments (page 47)</i>	<p>It is not clear that there is sufficient evidence to justify the increase in parking requirements (in table 8) above what is required in the district.</p> <p>Whilst it is acknowledged that parking should be in accordance with Oxfordshire County Council Road Design Guide (2003) Second Edition (2015) and there is some evidence that to support a deviation from this. It is unlikely that this would policy would be applicable to the entirety of Shrivenham without detailed evidence to support the approach on a road by road basis highlighting affected areas.</p>
12.	<i>Policy EE1c: Residential Sites (page 50)</i>	<p>The policy title does not accurately reflect the policy. It may be better titled 'Change of use'</p> <p>The policy wording does not seem to align with the policy objective.</p>
13.	<i>Policy EE2: Diversity of Businesses and Services</i>	As currently drafted the policy lacks clarity and precision.

Ref.	Section/Policy	Comment/Recommendation
	<i>(page 50)</i>	
14.	<i>Policy LC1: Protecting the setting of the AONB (page 51)</i>	The guidance referenced in the policy is not a development plan document and has not been examined, therefore it is inappropriate to require development to accord with it. We would suggest that development should 'have regard' to it.
15.	<i>Policy LC2: Landscape setting (page 52)</i>	The policy may benefit from some additional definition of terms, specifically what is meant by a site bordering the landscape setting.
16.	<i>Policy LC3b: Rural landscape setting of Listed Buildings (page 53)</i>	It may be useful to ensure the wording in the neighbourhood plan policy aligns with the referenced local plan policy. The neighbourhood plan policy refers to all development, whereas Core Policy 39 refers to new development.
17.	<i>Policy LC4 (page 53)</i>	The policy lists over 30 views. It is not clear how all the views have been identified and refined. Although the landscape character assessment identifies views in general terms, it does not necessarily specify that they are valuable. Furthermore, some views (specifically 18 and 22) have been identified under LC4c as not being suitable for tall structures, whereas the landscape character assessment does not highlight that these areas would be affected by tall structures. In addition, view 24 is located outside of the designated area.
18.	<i>Policy LC5: Designation of Green Spaces (page 60) and appendix 24</i>	Although the evidence base document refers to the NPPF paragraph 100 criteria and describes the spaces value in terms of criteria a and b, the evidence for criteria c would benefit from further exploration to ensure all the sites are suitable for designation.
19.	<i>Policy HE1a: Conservation and enhancement of historic features (page 63)</i>	It may be useful to ensure the wording in the neighbourhood plan policy aligns with the referenced local plan policy. The neighbourhood plan policy refers to all development, whereas Core Policy 39 refers to new development.
20.	<i>Policy HE1b: Conservation and</i>	This is a new policy introduced since the presubmission consultation. There is some

Ref.	Section/Policy	Comment/Recommendation
	<i>enhancement of Archaeological features (page 63)</i>	supporting text within the policy. There is also some repetition from national policy.
21.	<i>Policy HE2c: Maintenance of planted areas including buffers and planting (page 64)</i>	The policy requires development proposals to include arrangements for the ongoing maintenance of planted areas; this is likely to be outside the remit of planning and may be better explored through a community action.
22.	<i>Policy HE4a: Green and Wildlife movement corridors (page 65)</i>	It may not be appropriate to require all applications to secure safe movement. For example change of use applications and minor development such as small scale extensions.
23.	<i>Policy HE4b: Protection of Biodiversity during development (page 65)</i>	Requiring all new development to be accompanied by a plan to protect existing wildlife and habitats is an administrative requirement; we would suggest modifying the policy so that it encourages development to protect wildlife and habitats.
24.	<i>Policy PROW1: Public Rights of Way and Cycleways (page 66)</i>	As above, the requirements may not be applicable to all applications.
25.	<i>Policy CSH1b: Infrastructure Development (page 68)</i>	<p>We note that Policy CSH1b requires that sufficient support infrastructure is provided, complete and operational prior to occupation of any properties in new or refurbished development.</p> <p>Whilst the related Objective SCSH1 and Policy CSH1a appear to be appropriate, Policy CSH1b is open to interpretation as to whether it relates to existing infrastructure (reflecting the objective) or new infrastructure, and what might be deemed 'sufficient'. Certainly in the case of new infrastructure and perhaps under certain circumstances for existing infrastructure, this may be challenging to implement.</p>
26.	<i>Policy CSH3: Requirement for a CEMP (Construction Environment Management Plan) (page 69)</i>	<p>The matters listed within the policy are usually referred to as a CTMP (Construction Traffic Management Plan). A CEMP is usually concerned with protecting the biodiversity of the site.</p> <p>Furthermore, the supporting text may raise unrealistic expectations, as much of the work</p>

Ref.	Section/Policy	Comment/Recommendation
		done by statutory undertakers is carried out using permitted development rights.
	<i>Policy CSH4: Waste Hierarchy (SNP-WH) (page 70)</i>	This policy has been introduced since the presubmission consultation. Although an admirable aim, it is not within the remit of planning and would be better suited as a community action.

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

Title	-
Name	Deborah Bryson
Job title (if relevant)	Senior Planning Policy Officer
Organisation (if relevant)	Vale of White Horse District Council
Organisation representing (if relevant)	-
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Response 8

Respondent Details

Information	
Respondent Number: 8	Respondent ID: 128230609
Date Started: 02/10/2019 08:44:40	Date Ended: 02/10/2019 09:36:39
Time Taken: 51 mins, 59 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Agent

Your comments

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

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: Mr P Butt Response-compressed.pdf

Your details and future contact preferences

Please reply to: Mr P Butt BA(Hons) DipUP DipUD MRTPI
Direct Line: 07760 210952
Email: paulbuttplanning@btinternet.com
My ref: 2018-250
Your ref:

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29 September 2019

Dear Sir/Madam,

Comments on the Shrivenham Neighbourhood Plan 2018-2031 (the plan) and supporting documents.

Introductions and Summary:

On behalf of my clients [redacted] and [redacted], owners of the land comprising Shrivenham Golf Course (the golf course), I would like to make the following comments on the Plan and supporting documents and suggest some changes. For information the area in my client's ownership is outlined approximately in red below. I would ask the examiner to note that the golf course is artificially landscaped and is heavily manicured, factors which give it a reasonably developed character that is quite different to undeveloped countryside. These factors were confirmed in an appeal decision ref. APP/V/3120/W/19/3225150 dated 11 June 2019 a copy of which is attached to these comments. I would also ask the examiner to note that part of the golf course (the three northerly holes on the Watchfield side of Pennyhooks Brook) is not within the designated area of the Plan, identified in Figure 1.1 on page 9 the Plan, and that the Sewage Works and the residential properties and commercial buildings at Northford Close are within the designated area.

Outline of the golf course.



The response that was made by my clients to the Shrivenham Neighbourhood Plan Pre-submission Version September 2018 (the Pre-submission Plan), copy response attached for convenience, requested that the Parish Council reconsider in the Pre-submission Plan:

"(a) the wording of Policy DS1: Settlement Gap so that it allows for some flexibility rather than having an absolute prohibition on any development on the Golf Course;

(b) the wording in para. 2.1.5 which identifies the Golf Course as "...a club course which provides a buffer of landscaped green space between Shrivenham and Watchfield"; and

(c) the landscape character area LCA6 'Golf Course and Surrounds' as it is identified in the Shrivenham Landscape Character Assessment (pages 57 – 60). Village views V8, V9 and V10 were listed in Table 9 and identified in Figure 4.3 of the Plan to which Policy LC4b: 'Views and vistas within the village' applies. The views listed in Table 9 and on Figure 4.3 "have been identified as important to the village. Development proposals that preserve and enhance these views will be strongly supported." Para. 4.5.6 of the [Pre-submission] Plan advises that these views "were identified as important to the village following consultation with the Shrivenham Walking Group (Shrivenham amblers), the Health walkers who regularly walk around the village and residents. These are views that people identify with the local character of the area." However, village views V8, V9 (there are unfortunately two V9's in Figure 4.3) and V10 all appear to be from private land rather than definitive public rights of way, and three of the views from within the Golf Course itself. It is noted that village views V8 and V10 are not within the designated area of the Plan."

All of these have been agreed by the Parish Council in submitting the Plan to the Vale of White Horse District Council (the District Council):

(a) Policy DS1 did say in the Pre-submission Plan:

*"Policy DS1: Settlement Gap Development proposals shall respect the individual and distinct identity of Shrivenham Village and the open gaps between it and Watchfield Village, Bourton Village, Longcot Village and Swindon. Development **will not be permitted if it contributes to** the reduction of visual and physical separation of Shrivenham from surrounding settlements **and/or** harms the setting and identity of presently distinct areas. This is in accordance with saved Policy NE10 from the VWHDC local plan 2011."*

Policy DS1 now says:

*"Policy DS1: Settlement Gap Proposals shall respect the individual and distinct identity of Shrivenham Village and the open gaps between it and Watchfield Village, Bourton Village and Longcot Village. Development **shall only be permitted if it preserves** the visual and physical separation of Shrivenham from surrounding settlements **and** does not harm the setting and identity of presently distinct areas."*

My clients are grateful that development on the golf course will be permitted under Policy DS1 if it preserves the visual and physical separation of Shrivenham from Watchfield and does not harm the setting and identity of this distinct area.

(b) the wording in para. 2.1.5 of the Pre-submission Plan was:

*"golf – **including a club course which provides a buffer of landscaped green space between Shrivenham and Watchfield.**"*

The wording in para. 2.1.5.2 is now:

*"Sports facilities include athletics; bowls; cricket; football, tennis, **golf** and small bore shooting."*

My clients are grateful that it has been recognised that the 'club course' ought not to be singled out as being described as providing a buffer of landscaped green space between Shrivenham and Watchfield. Just to repeat from the comments on the Pre-submission Plan there is no intention not to retain a meaningful settlement gap between Shrivenham and Watchfield.

(c) If you compare Figure 4.3 'Map showing the location of valued views and vistas in the NE quadrant of the parish' of the Pre-submission Plan with Figure 4.4 of the Plan that has been submitted to the District Council (extracts reproduced below for convenience) you'll see that the 'valued views and vistas' across the golf course have completely changed! View V9 for example has been removed next to the corner of Faringdon Road and Pennyhooks Lane. However, others like view 14, the two views 16, and views 20 and 24 on the golf course have been added (view 24 being outside the designated area of the Plan).

Figure 4.3 'Map showing the location of valued views and vistas in the NE quadrant of the parish' of the Pre-submission Plan.

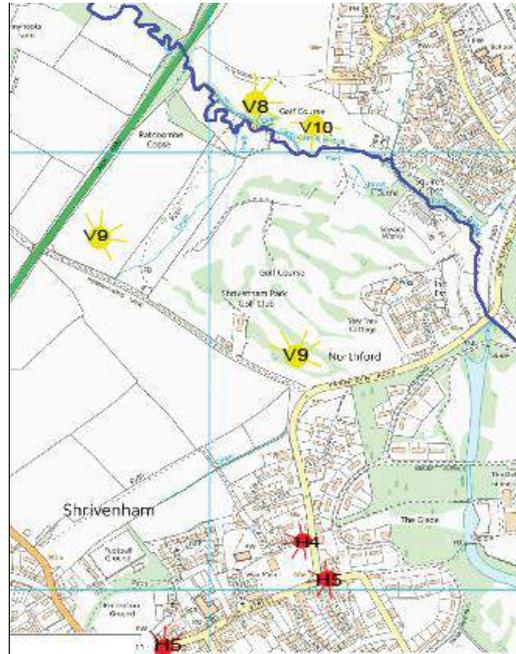
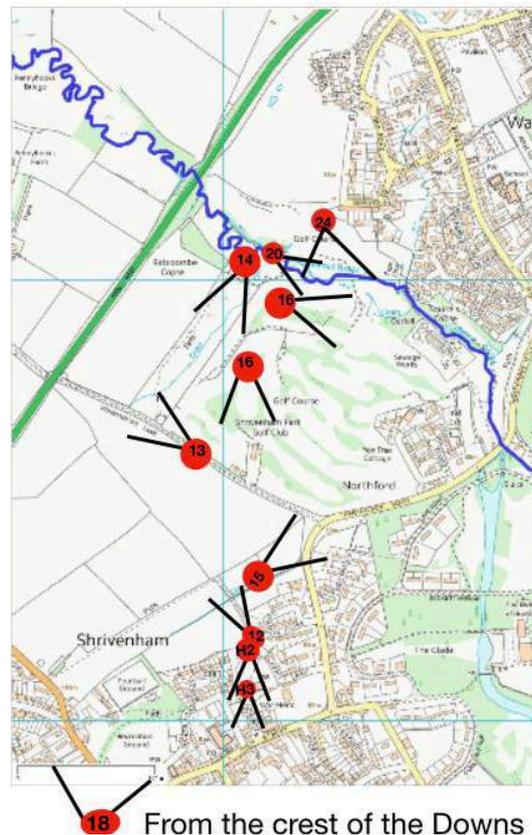


Figure 4.4 of the Plan that has been submitted to the District Council.



Comments on the Plan:

My comments made on the Plan are:

(i) to request that **inaccuracies in the Fig. 4.4 Map on page 56 showing the location of valued views and vistas** in the NE quadrant of the parish **are considered and that changes made to Figure 4.4 so that it is accurate and does not include land that it outside the designated area.** In particular view 14 is from private land rather than a definitive public right of way such as footpath 345/3, the southernmost view 16 (there are two '16's shown on Fig. 4.4 and in the accompanying table on page 54 these are 'Across golf course from footpath 345/3' relating to Policy 'LC4b') is inaccurately plotted, and view 24 is not in the designated area of the Plan. Having two view 16's is in itself confusing and the southernmost view 16 is inaccurate as it does not lie on the line of footpath 345/3, as neither does view 14;

(ii) the only **photograph** in the NE quadrant is on page 59 of the Plan showing **'Fig 4.18 View 16 Across golf course from footpath 345/3'** with The Church of St Andrew, a Grade 1 Listed Building, as the focus in the photograph. This is also **inaccurate** as the photograph is not taken from footpath 345/3 but rather from some distance away down the first fairway, and Figure 4.18 should be either be removed or replaced with a photograph that is taken from footpath 345/3 (a photograph taken from footpath 345/3 giving the best view of The Church of St Andrew is included below);

(iii) on page 53 para. 4.6.6 advises that the supporting Landscape Character Assessment has identified character area LCA6 'Golf Course and Surrounds' as a **'rural setting'** in which Policy LC4b: 'Valued views and vistas **within the village**' advises that **the views listed in Table 9 on pages 54 and 55 of the Plan, including views 14, 16, 20 and 24, "have been identified as important to the village by residents"**. As some of these views are inaccurate as they are shown in Figures 4.4 and 4.18, and there is nothing in the supporting documents to show that views 16 have been identified by any resident as important, it is considered that the information on which Table 9, Figures 4.4 and 4.18 are based **ought to be made available for the consideration in the consultation on, and examination of, the Plan;** and

(iv) **to suggest the removal of the 'Figure 4.1 Map demonstrating settlement gap'** on page 40 of the Plan, which has been added since the Pre-submission Version.

Inaccuracies in the Fig. 4.4 Map on page 56 showing the location of valued views and vistas on page 56:

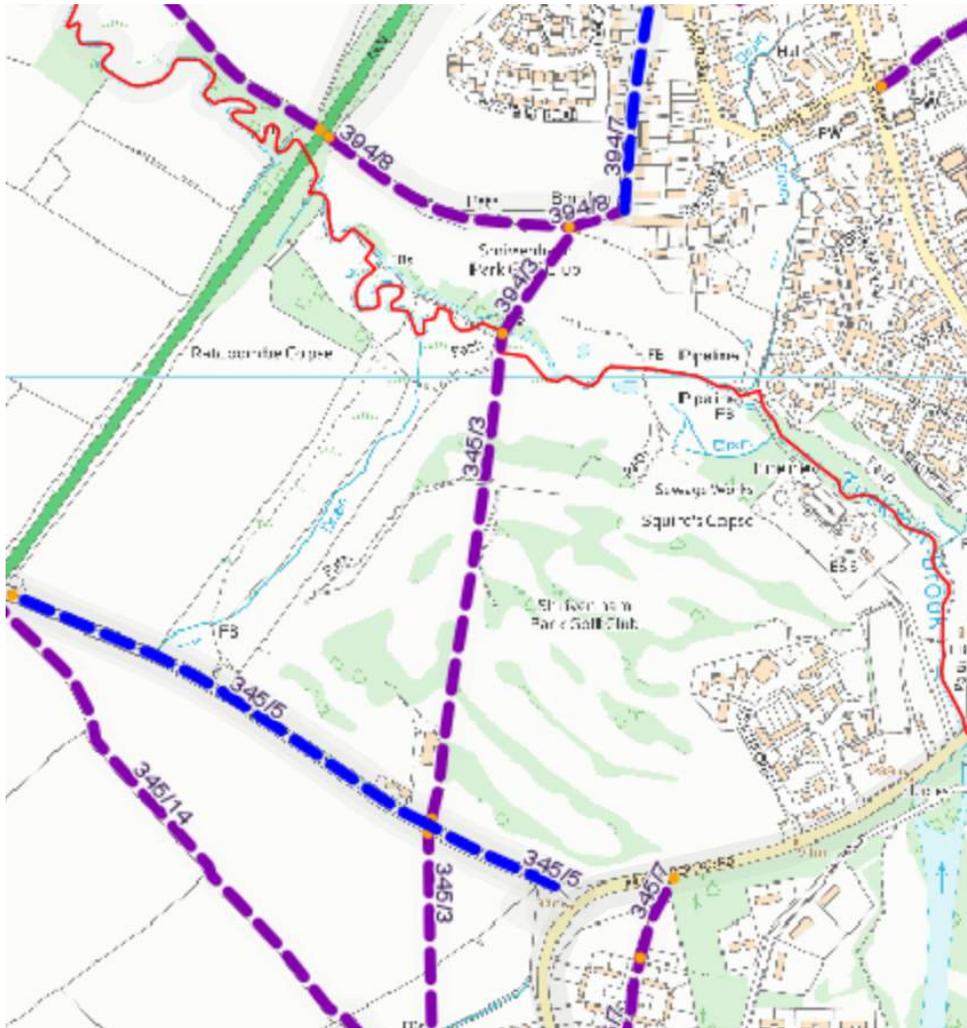
It should first be noted that there was only one valued view and vista identified on the golf course in Figure 4.3 to the Pre-submission Plan, extract reproduced above, that being 'V9'. That valued view and vista has been removed in Figure 4.4 to the Plan because, as advised in the response to the Pre-submission Plan, it is from private land rather than a definitive public right of way such as footpath 345/3. Curiously though, whilst 'V9' has been removed, a number of others including 14, two 'V16', 20 and 24 have been added to Figure 4.4 of the Plan that has been submitted to the District Council which all are private views save for 24. This brings into doubt whether any of the views and vistas identified in Figure 4.4 have been identified as important to the village by residents as the Plan advises in para. 4.6.6, and more importantly view 14 is from private land and should be removed from Figure 4.4 of the Plan, and the southernmost view 16 and view 20 are well off the line of footpath 345/3. The definitive footpath map is reproduced below and from inspection you can see that the southernmost view 16 is plotted well to the west of footpath 345/3, and is a private view. You can also see that views 14 and 20 are also well to the west of the footpath and are also a private view.

It is requested that:

- (a) views 14 and 24 are removed from Figure 4.4 to the Plan; and**
- (b) the southernmost view 16 and view 20 are either removed or replotted so that they are on the line of the footpath (from walking the footpath there is no view to speak of from views 16 from the footpath, and view 20 may have been intended to be from the footbridge over Pennyhooks Brook...although again from walking the footpath there is no view to speak of). In the event that there is nothing forthcoming to show that views 16 and 20 have been**

identified by any resident as important, then it is requested that views 16 are also removed from Figure 4.4.

Extract from the definitive footpath map.



Inaccurate 'Fig 4.18 View 16 Across golf course from footpath 345/3' on page 59:

From walking the footpath and standing on the location of the photograph shown in Fig 4.18 of a view of The Church of St Andrew it is clear that this photograph is taken from some distance away down the first fairway well to the east of footpath 345/3.

Below is the best photograph that could be obtained from walking the footpath of The Church of St Andrew (the photograph is to the south of the southernmost view 16 and the top of the tower of The Church of St Andrew is just about visible immediately to the right of the junction box on the telegraph pole.



It is requested that Figure 4.18 is either removed or the photograph above replaces the one that has been used.

Removal of the 'Figure 4.1 Map demonstrating settlement gap' on page 40:

Under the heading 'Landscape and Village Character Assessments' in para. 3.3.11.2 of the Plan, of the 13 different landscape character assessments in the Plan area the golf course is identified as LCA6 'Golf Course and Surrounds'. A detailed map and description of LCA6 can be found in the Landscape Character Assessment April 2018 (LCA2018) *"together with detailed recommendations to plan, manage and protect the distinctiveness of each landscape area"* (para. 3.3.11.3 of the Plan). It is noted that the map on page 57 of the LCA2018 does not include the three northerly holes of the golf course on the Watchfield side of Pennyhooks Brook, and that the sewage works and the residential properties and commercial buildings at Northford Close are included in LCA6 (para. 10.1.1 of the LCA2018). In the landscape appraisal at para. 10.3 of the LCA2018 *"The land cover at this area is comprised mostly of amenity grassland associated with Shrivenham Park Golf Club", "Broadleaved and coniferous trees are scattered across the golf course which surround the fairways"* and *"A car park and clubhouse buildings associated with the golf*

course is also located within this area.” There are of course a number of other buildings associated with the Golf Course including the machinery store building that has planning permission to be extended under planning permission ref. P17/V2785/O for a new clubhouse.

At para. 10.4 the LCA2018 advises of LCA6 that perceptually and aesthetically:

“Long distance views from this area are limited due to the presence of broadleaved and coniferous trees that are scattered across the golf course.”

Recommendations to plan, manage and protect the distinctiveness of LCA6 are given in para. 10.5 as:

- ***Development at this location should be avoided as this will lead to coalescence of Shrevenham and Watchfield.***
- *Trees located across the area should be maintained.*
- ***The golf course is considered to be a valuable GI asset and should be maintained.***

Whilst my client’s focus is to find a solution to the unsustainable financial status of the golf course, which will mean this Green Infrastructure asset can be maintained, the landscape appraisal does not appear to ring true in accepting that long distance views are limited from LCA6 but nevertheless recommending development in this location should be avoided. Nor does it ring true that long distance views from the area are limited in the LCA2018 and yet the Plan has added in views 14, two 16’s, 20 and 24 on the golf course to the Pre-submission Plan.

In any event LCA6 and the recommendation that development be avoided does not cover the three northerly holes on the golf course on the Watchfield side of Pennyhooks Brook which lie outside LCA6 and the designated Plan area.

Figure 4.1 of the Plan appears to have been overdrawn with a felt-tip pen to demonstrate settlement gaps and it is difficult to accurately identify the precise boundaries, for example around the Sewage Works and Northford to which Plan Policy DS1: Settlement Gaps applies.

In the Plan Policy DS1: Settlement Gap states:

“Proposals shall respect the individual and distinct identity of Shrevenham Village and the open gaps between it and Watchfield Village, Bourton Village and Longcot Village. Development shall only be permitted if it preserves the visual and physical separation of Shrevenham from surrounding settlements and does not harm the setting and identity of presently distinct areas.”

The accompanying general note 4.2.2 states:

“This policy is in accordance with Development Policy 29 in the VWHDC Local Plan part 2 which sets out measures to ensure that proposals do not compromise important gaps between settlements.”

Development Policy 29 'Settlement Character and Gaps' of the Local Plan part 2, which has yet to be adopted by the District Council but attracts significant weight following the examining Inspector's report, states:

“Development proposals will need to demonstrate that the settlement’s character is retained, and physical and visual separation is maintained between settlements.

Development proposals will be considered in the context of Core Policy 4 in the Local Plan 2031 Part 1, and in addition, will only be permitted provided that:

- the physical and visual separation between two separate settlements is not UNACCEPTABLY diminished,*
- cumulatively, with other existing or proposed development, it does not compromise the physical and visual separation between settlements, or*
- it does not lead to a loss of environmental or historical assets that individually or collectively contribute towards their local identity.”*

No 'Gaps' are identified on the Draft Adopted Policies Maps to the Local Plan 2031 Part 2...indeed any

identified gaps have been taken out from the Adopted Policies Maps in the adopted Local Plan 2031 Part 1 by the District Council (in which the gap between Shrivenham and Watchfield was not identified as important)...so it is not clear why they need to be shown in the Plan in Figure 4.1 and which has been added since the Pre-submission Plan.

It is requested that Figure 4.1 is removed as it is not accurate, apparently having been overdrawn with a felt-tip pen, and to include it would be inconsistent with the adopted Local Plan Part 1 and Part 2, and also unnecessary taking into account Core Policy 4 and Development Policy 29 in these respective plans.

Conclusions:

The requested changes to the Plan are intended for accuracy, rather than having to be considered in a planning application that may be made on the golf course in addition to the new clubhouse that has recently be granted planning permission by the District Council, and to help the Plan to achieve its Objectives as they are set out in para. 3.2.3 of the Plan. In particular to help retain the golf course as a local community facility (objective SCSH1) and for the golf course to be able to further encourage a healthy recreational facility for all age groups and abilities (objective SCSH2), whilst at the same time avoid the coalescence of Shrivenham and Watchfield (objective SDS1).

There is no intention not to retain a meaningful settlement gap between Shrivenham and Watchfield. This can be achieved with the golf course being 'saved' and its facilities improved, continuing to preserve the visual and physical separation of Shrivenham from Watchfield and not harming the setting and identity of the area in accordance with Policy DS1: Settlement Gap. Indeed, with a sensitive limited development together with a comprehensive landscaping scheme for both the limited development and the Golf Course it is considered that there could be an enhancement of the views, and the gap.

My client's focus, in discussion with the golf club and Parish Council, is to find a solution to the unsustainable financial status of the golf course.

I hope these comments help and believe that the requested changes will help to better achieve the objectives of the Plan.

Yours sincerely,

Paul Butt BA(Hons) DipUP DipUD MRTPI
Paul Butt Planning Ltd

Encs.

1. Appeal decision ref. APP/V3120/W/19/3225150.
2. Response that was made to the Shrivenham Neighbourhood Plan Pre-submission Version September 2018.



RTPI

mediation of space · making of place

Chartered Town Planner



Appeal Decision

Site visit made on 3 June 2019

by Andrew Tucker BA (Hons) IHBC

an Inspector appointed by the Secretary of State

Decision date: 11 June 2019

Appeal Ref: APP/V3120/W/19/3225150

Land at the Old Surgery, Northford Close, Shrivenham, Swindon SN6 8EY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mrs G Haslett against the decision of Vale of White Horse District Council.
 - The application Ref P18/V2762/FUL, dated 2 November 2018, was refused by notice dated 21 January 2019.
 - The development proposed is the demolition of former surgery and erection of a two bed dwelling, including landscaping.
-

Decision

1. The appeal is allowed, and planning permission is granted for the demolition of former surgery and erection of a two bed dwelling, including landscaping at Land at the Old Surgery, Northford Close, Shrivenham, Swindon SN6 8EY in accordance with the terms of the application, Ref P18/V2762/FUL, dated 2 November 2018, subject to the conditions set out in the attached schedule.

Preliminary Matter

2. In the statement that it submitted during the appeal the Council states that it withdraws its second reason for refusal, which relates to safe refuse collection and accessibility. As such this is no longer a matter in dispute and will not form a main issue of my decision.

Main Issues

3. The main issues are:
 - (a) whether the site would be suitably located for the proposed dwelling, with regard to local planning policies, and
 - (b) the effect of the proposal on the character and appearance of the area.

Reasons

Location

4. The appeal site is located in a well developed area that is between and very close to the settlements of Shrivenham and Watchfield, adjacent to an area known as Northford and alongside a golf course, with the expansive site of the Defence Academy on the opposite side of the road. Policy CP3 of the Vale of White Horse District Council Local Plan 2031 Part 1 Strategic Sites and Policies

adopted 2016 (LP2031) classifies Watchfield and Shrivenham as Larger Villages within its settlement hierarchy.

5. The Council suggests that the site relates more clearly to open countryside than the adjacent developed area. Although I accept that the site abuts the area of Northford, rather than being an integral part of that area, I am not satisfied that it is in an area that can be considered open countryside, and can certainly not be considered isolated. The site is immediately alongside the developed area of Northford, with further development on the opposite side of the road associated with the Defence Academy, and it abuts the developed area of Shrivenham to the southwest, on the other side of the road.
6. I accept that the adjacent golf course is an open area that features few built structures, however it is artificially landscaped and is heavily manicured. These factors give it a reasonably developed character that is quite different to undeveloped countryside. Furthermore, the existing site does not project prominently into the golf course area owing to its established boundaries to the south and west, which would be retained as part of the proposal.
7. A small building currently stands on the site. Evidence before me suggests that it was used as a veterinary surgery for a number of decades during the 20th century, although the building and the associated land does not appear to have been put to any meaningful use for some time. I accept that the existing building is modest and that the business that it facilitated must also have been of a small scale. Nevertheless, the presence of this permanent building on the site, and the evidence of a previous business that operated from the building clearly give the site the status of previously developed land.
8. I am therefore satisfied that the site forms part of the developed area of the adjacent village of Shrivenham and as such is not within the open countryside. With reference to paragraph 4.8 associated with Policy CP3 of the LP2031, the site has good access to local services contained within either of the adjacent villages, and public transport connections to larger settlements.
9. Therefore, in summary of this main issue I find that the site is suitably located for the proposed dwelling, in accordance with Policies CP1, CP3 and CP4 of the LP2031, and the National Planning Policy Framework (the Framework), which together establish the presumption in favour of sustainable development within the existing built area of a Larger Village, and the desirability of making effective use of previously developed land.

Character and appearance

10. It is clear that the proposal is not to convert the existing building. Instead, the small building would be demolished and replaced with a larger building in a position closer to the road. Although larger, the proposed dwelling would incorporate a mix of materials with a broken massing and low eaves level that would minimise its bulk. It would relate well to the design of the adjacent dwelling known as The Old Sawmill, in terms of built form, siting and materials.
11. The Council refer to the effect of the proposal on local landscape character. The site itself is modest and would remain well contained owing to the retention of the well established boundaries to the west and south. Although the building would be visible over the height of these retained boundaries it would not be overly prominent, and would be seen in the context of the adjacent

development and the developed area of the golf course. In other respects, the area does not appear to have particular landscape characteristics such as an open vista that would be affected by the proposal, and I note that the Council has not expanded on this in any detail in evidence it has produced as part of the appeal.

12. In summary, the proposal would not have a harmful effect on the character or appearance of the area, and would accord with Policy CP37 of the LP2031, Saved Policy NE9 of the Vale of White Horse Local Plan 2011 adopted 2006 (LP2011), and the Framework, which together seek to ensure that development proposals are of a high quality of design and do not harm landscape character.

Other Matters

13. In its first reason for refusal the Council also refers to Policy CP29 of the LP2031, which relates to the change of use of existing employment land and premises. The employment use at the site has long ceased, and in any case is likely to have been of a very small scale. The loss is therefore very modest and would be offset by employment opportunities arising from the construction of a new dwelling. As such I am satisfied that the proposal would not conflict with this Policy.
14. The Council also refers to Policies GS6 and GS7 of the LP2011 in its first refusal reason. However, these policies relate to the redevelopment or the re-use or adaptation of an existing building outside a settlement. Therefore, they have not been determinative as the proposal includes the complete demolition of the existing building and is not located outside the built-up area of a settlement.
15. The proposed dwelling would be constructed close to an existing lime tree. In response to observations that the Council made in respect of this, the appellant submitted comments prior to the Council's determination of the application. The submitted plans show how the root protection area has been accounted for in the proposed foundation design, and demonstrate that the tree canopy is over the northeast of the plot. This would be away from the parking area and majority of the garden and would not overhang the proposed dwelling. Therefore, honeydew deposits should not be problematic, and neither should the tree restrict daylight to the proposed garden area. I am therefore satisfied that the proposal does not cause harm to the existing tree, and should not put pressure on its removal in the future.
16. Third parties have raised concerns relating to highway safety, flooding and accessibility. The evidence before me demonstrates that these matters have been thoroughly considered by the Council. Based on my assessment of the proposal and my visit to the site I find no reason to come to a contrary view. Matters raised relating to land ownership and access are private matters that are not relevant to my decision.

Conditions

17. I have had regard to the planning conditions that have been suggested by the Council and considered them against the tests in the Framework and the advice in the Planning Practice Guidance. I have imposed a condition specifying the approved plans as this provides certainty and a materials condition, to safeguard the character and appearance of the area. I have imposed conditions

relating to parking provision, access, visibility splays and bin storage to ensure that the proposal does not harm highway safety. I have also imposed conditions relating to surface water and foul water disposal to ensure that the site is drained effectively and does not cause localised flooding. These conditions need to be pre-commencement to ensure that the Council has opportunity to consider the schemes and they are in place before other work at the site commences. This has been agreed with the appellant.

18. The Council has suggested a condition to restrict permitted development rights to extend the property once it has been built. Owing to the small site, the opportunity to extend the dwelling would be limited, however as the site is well contained, I am not satisfied that an extension to the property would necessarily be harmful. As such I do not consider this condition to meet the tests in the Framework, in terms of being necessary.

Conclusion

19. For the reasons above, the appeal is allowed.

Andrew Tucker

INSPECTOR

Please reply to: Mr P Butt BA(Hons) DipUP DipUD MRTPI
Direct Line: 07760 210952
Email: paulbuttplanning@btinternet.com
My ref: 2018-250
Your ref:

Paul Butt Planning
8 Hyde Copse
Marcham
Oxfordshire
OX13 6PT

Shrivenham Parish Clerk (Mrs Julia Evans)
C/O clerk@shrivenham.org

12 November 2018

Dear Julia,

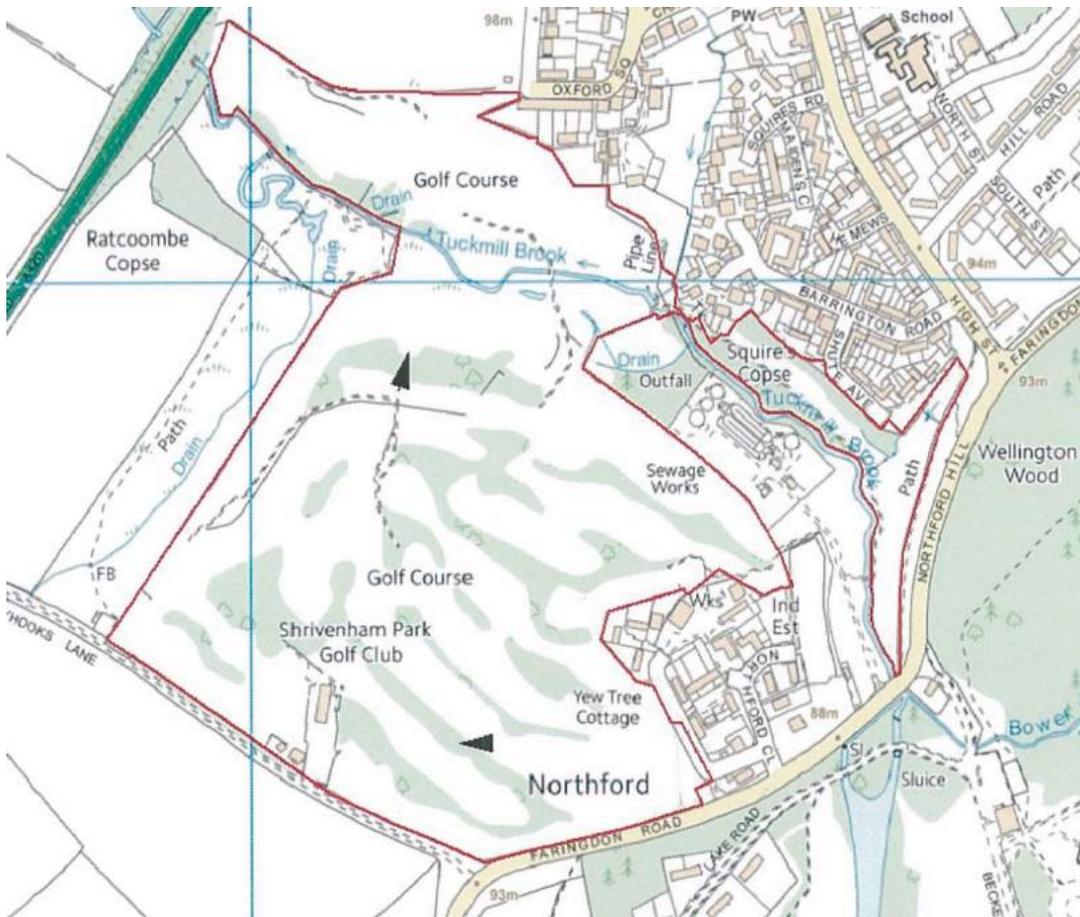
Comments on the Shrivenham Neighbourhood Plan Pre-submission Version September 2018 (the Plan).

Introductions and Summary:

Further to our meeting on the 25 October 2018 on behalf of my clients _____ and _____, owners of the land comprising Shrivenham Golf Course (the Golf Course), I would like to make the following comments on the Plan and suggest some changes.

For information the area in my client's ownership is outlined approximately in red Figure 1 below and amounts to about 45ha (110 acres) in area. It is noted that part of the Golf Course (the three northerly holes on the Watchfield side of Pennyhooks Brook) is not within the designated area of the Plan identified in Figure 1.1 in the Plan, and that the sewage works and the residential properties and commercial buildings at Northford Close are within the designated area.

Figure 1. Outline of the Golf Course.

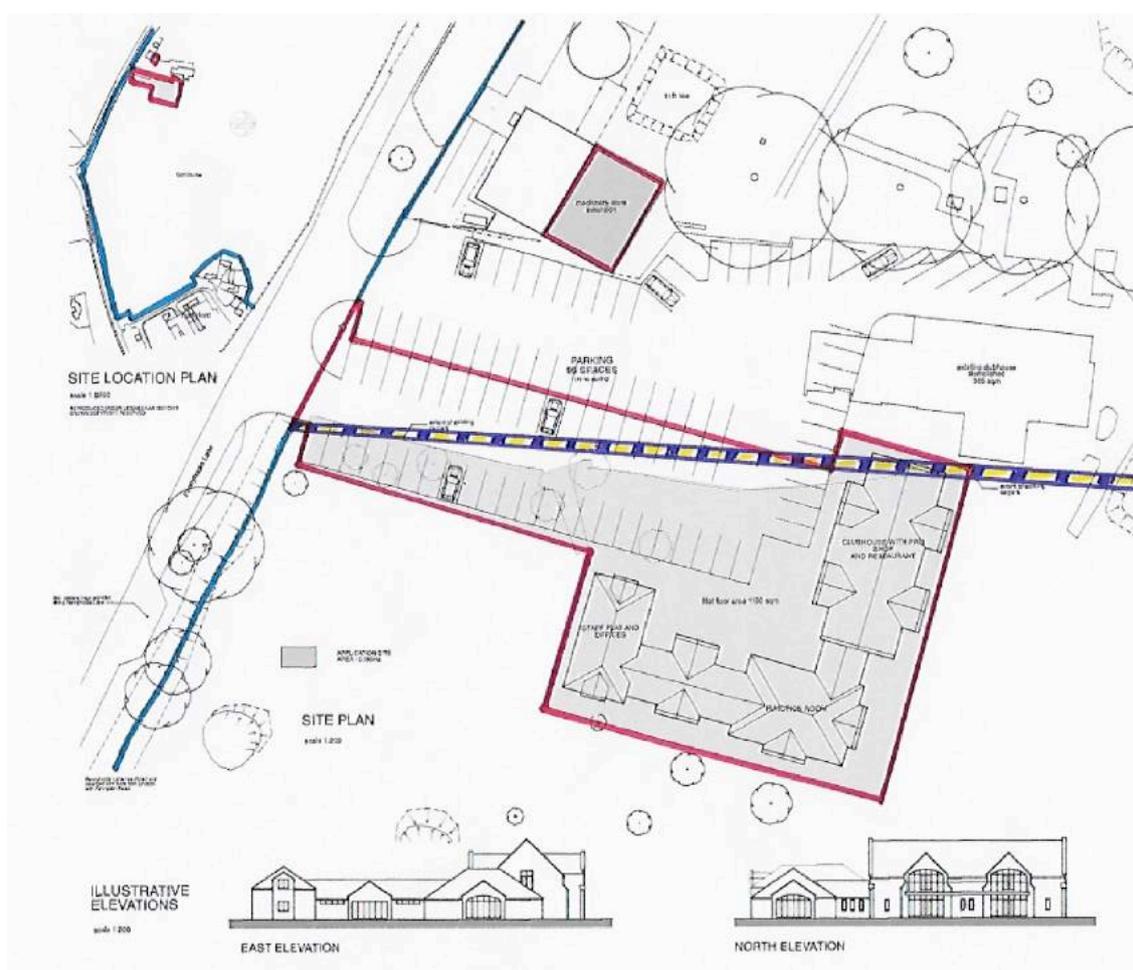


At our meeting [redacted] advised of the unsustainable financial status of the Golf Course, supported by a report from Savills in 2017 which [redacted] and [redacted] are happy to share with the Plan's Steering Group to demonstrate that it is not a viable business. In essence [redacted] and [redacted], as the landlords (Ballgame Ltd), have been subsidising the Golf Course and have been for the last 10 years or so, a position that cannot reasonably continue. An Outline planning permission for a new clubhouse to provide improved facilities was achieved in 2005 (P05/V0665/O) but this expired and subsequently an extant planning permission was achieved on the 31st January 2018 (P17/V2785/O). An extract from the approved plan is reproduced in Figure 2 below. In the delegated report to the latest planning permission the Case Officer advised (my highlighting in bold):

“officers are supportive of the sustainable growth and expansion of all types of business. This includes the support of sustainable rural tourism and leisure development that benefit businesses in rural areas, communities and visitors”.

Unfortunately from the Savills report the new clubhouse providing improved facilities is not able to be completed given the unsustainable financial status of the Golf Course.

Figure 2. Extract from the approved plan for the new clubhouse, and extension to machinery store.



The suggested changes are intended to help the Plan to achieve its Objectives, as they are set out in para. 3.2.2 of the Plan. In particular to help retain the Golf Course as a local community facility (objective SCSH1) and for the Golf Course to be able to further encourage a healthy recreational facility for all age groups (objective SCSH2), whilst at the same time avoid the coalescence of Shrevenham and Watchfield (objective SDS1).

It is considered that these objectives can be achieved, in consultation with the golf club and the Parish Council, in a way that, in addition, could also achieve a number of the other objectives as set out in the Plan, including for housing (with housing specifically designed to meet objectives SH1, SH3, SH4 and SD1, and including starter homes and homes for elderly residents) and employment (with the inclusion of specifically designed home working and with high-speed broadband to meet objectives SEE1 and SEE2).

What and have in mind is to 'save' the Golf Course for the long-term by putting it on a firm financial footing. This will require some changes to the Golf Course funded by limited development to finance the changes and improve the facilities so that it can be a viable business. As presently worded the Plan would not allow this to happen and the potential to achieve the Plan's Objectives would be lost, as indeed may the Golf Course.

I hope that our meeting and these comments and suggestions will in particular enable you to reconsider in the submission Plan:

- (a) the wording of Policy DS1: Settlement Gap so that it allows for some flexibility rather than having an absolute prohibition on any development on the Golf Course;
- (b) the wording in para. 2.1.5 which identifies the Golf Course as *"...a club course which provides a buffer of landscaped green space between Shrivenham and Watchfield"*; and
- (c) the landscape character area LCA6 'Golf Course and Surrounds' as it is identified in the Shrivenham Landscape Character Assessment (pages 57 – 60). Village views V8, V9 and V10 are listed in Table 9 and identified in Figure 4.3 of the Plan to which Policy LC4b: 'Views and vistas within the village' applies. The views listed in Table 9 and on Figure 4.3 *"have been identified as important to the village. Development proposals that preserve and enhance these views will be strongly supported."* Para. 4.5.6 of the Plan advises that these views *"were identified as important to the village following consultation with the Shrivenham Walking Group (Shrivenham amblers), the Health walkers who regularly walk around the village and residents. These are views that people identify with the local character of the area."* However, village views V8, V9 (there are unfortunately two V9's in Figure 4.3) and V10 all appear to be from private land rather than definitive public rights of way, and three of the views from within the Golf Course itself. It is noted that village views V8 and V10 are not within the designated area of the Plan.

In summary, there is no intention not to retain a meaningful settlement gap between Shrivenham and Watchfield. This can be achieved with the Golf Course being 'saved' and its facilities improved, providing a buffer of landscaped green space, and also a limited development that retains the village views V8, V9 and V10 that have been identified as important to the village.

Indeed, with a sensitive limited development together with a comprehensive landscaping scheme for both the limited development and the Golf Course it is considered that there could be an enhancement of the views, and the gap.

My client's focus, in discussion with the golf club and Parish Council, is to find a solution to the unsustainable financial status of the Golf Course. For example the development of an Extra Care facility for the elderly, to include a mix of types of accommodation including bungalows, Starter Homes for first time buyers (sold at a 20% discount from market rate), and possibly a healthcare facility (noting the comments in the Plan at para. 3.3.10 on the existing doctors surgery).

Comments:

The Plan and its appendices make several references to the Golf Course as follows (my highlighting in bold):

- (i) under the heading 'Village Amenities' in para. 2.1.5 that *"The village has Church of England and Methodist churches and a large village hall. Sports facilities include athletics; bowls; cricket; football, tennis and golf – including a club course which provides a buffer of landscaped green space between Shrivenham and Watchfield."*

Whilst it is accepted that the Golf Course (club course) is a village amenity, albeit a private facility, it does appear a little unfair that the Golf Course is singled out with the additional description of providing a buffer of landscaped green space between Shrivenham and Watchfield. After all none of the other village amenities have any additional description in the Plan that apparently seeks to prevent any development specifically on the Golf Course, unlike on the other village amenities. In the interests of fairness I would suggest the deletion of *"– including a club course which provides a buffer of landscaped green space between Shrivenham and Watchfield"*. This is particularly the case as the buffer of landscaped green space between Shrivenham and Watchfield is dealt with elsewhere in the Plan in Policy DS1: Settlement Gap,

Policy H1(criteria 3 and 5): General requirements for development, Policy D1b: Design, and Policy LC2: Landscape setting.

(ii) under the heading 'Landscape and Village Character Assessments', of the 13 different landscape character assessments in the Plan area the Golf Course is identified as LCA6 'Golf Course and Surrounds'. A detailed map and description of LCA6 can be found in the Landscape Character Assessment April 2018 (LCA2018) *"together with detailed recommendations to plan, manage and protect the distinctiveness of each landscape area"* (para. 3.3.8 of the Plan). It is noted that the map on page 57 of the LCA2018 does not include the three northerly holes on the Watchfield side of Pennyhooks Brook, and that the sewage works and the residential properties and commercial buildings at Northford Close are included in LCA6 (para. 10.1.1 of the LCA2018). In the landscape appraisal at para. 10.3 of the LCA2018 *"The land cover at this area is comprised mostly of amenity grassland associated with Shrivenham Park Golf Club", "Broadleaved and coniferous trees are scattered across the golf course which surround the fairways" and "A car park and clubhouse buildings associated with the golf course is also located within this area."* There are of course a number of other buildings associated with the Golf Course including the machinery store building that has planning permission to be extended under P17/V2785/O.

At para. 10.4 the LCA2018 advises of LCA6 that perceptually and aesthetically:

"Long distance views from this area are limited due to the presence of broadleaved and coniferous trees that are scattered across the golf course."

Recommendations to plan, manage and protect the distinctiveness of LCA6 are given in para. 10.5 as:

- ***Development at this location should be avoided as this will lead to coalescence of Shrivenham and Watchfield.***
- *Trees located across the area should be maintained.*
- ***The golf course is considered to be a valuable GI asset and should be maintained.***

Whilst my client's focus is to find a solution to the unsustainable financial status of the Golf Course, which will mean this Green Infrastructure asset can be maintained, the landscape appraisal does not appear to ring true in accepting that long distance views are limited from LCA6 but nevertheless recommending development in this location should be avoided.

In any event LCA6 and the recommendation that development be avoided does not cover the three northerly holes on the Watchfield side of Pennyhooks Brook which lie outside LCA6 and the designated Plan area.

To my mind a limited development of a sensitively and specifically designed scheme, for example an Extra Care facility for the elderly, with a mix of types of accommodation including bungalows, Starter Homes for first time buyers (sold at a 20% discount from market rate), and possibly a healthcare facility (noting the comments in the Plan at para. 3.3.10 on the existing doctors surgery), could be provided to meet the objectives of the Plan. Such a limited development could in particular maintain the Golf Course as a valuable GI asset, provide a buffer of landscaped green amenity grassland space between Shrivenham and Watchfield with an improved comprehensive landscaping scheme including broadleaved and coniferous trees for both the limited development and the Golf Course, in a way that would achieve an enhancement of the identified views, limited as they are, and at the same time maintain a meaningful gap.

Policy DS1: Settlement Gap

This policy at present states:

"Development proposals shall respect the individual and distinct identity of Shrivenham Village and the open gaps between it and Watchfield Village, Bourton Village, Longcot Village and Swindon. Development will not be permitted if it contributes to the reduction of visual and physical separation of Shrivenham from surrounding settlements and/or harms the setting and identity of presently distinct areas. This is in accordance with saved Policy NE10 from the VWHDC local plan 2011."

The objective of this policy is SDS1:

“To prevent coalescence of Shrivenham with neighbouring settlements and preserve the countryside setting of the village.”

The area(s) to which Policy DS1 relate are not defined in the Plan, including on Figure 4.1 (reproduced in Figure 2 below for convenience) which makes it difficult to know to what land Policy DS1 is referring. The gaps do appear quite large in extent. It is in any event helpful to note that a settlement gap between Shrivenham and Watchfield has not been identified by the District Council as an area of ‘Important Open Land’ to which Policy NE10 of the Local Plan 2011 relates. Indeed, the District Council’s Local Plan 2031 Part 2 (LPP2) is intended to replace the saved policies of the Local Plan 2011, including Policy NE10, and on the Policies Maps to LPP2 the District Council has deleted all of the ‘Important Areas of Open Land’ that are identified in the Local Plan 2011. In its stead, a more flexible policy in LPP2 is promoted by the District Council under Development Policy 29: Settlement Character and Gaps which states:

“Development proposals will need to demonstrate that the settlement’s character is retained, and physical and visual separation is maintained between settlements.”

Development proposals will be considered in the context of Core Policy 4 in the Local Plan 2031: Part 1, and in addition, will only be permitted provided that:

- i. the physical and visual separation between two separate settlements is not diminished*
- ii. cumulatively, with other existing or proposed development, it does not compromise the physical and visual separation between settlements, and*
- iii. it does not lead to a loss of environmental or historical assets that individually or collectively contribute towards their local identity.”*

Figure 2. Extract from Figure 4.1 of the Plan ‘Map demonstrating settlement gap’.



So long as a meaningful area of land between Shrivenham and Watchfield preserves the countryside setting of Shrivenham and the identity of LCA6, and prevents coalescence with Watchfield, objective SDS1 would be achieved. However, as written Policy DS1 appears to prevent any development on any part of the Golf Course within the Plan area to the south of Pennyhooks Stream, although the gap to the north of the stream is not within the Plan area and therefore would not be the subject of Policy DS1. It also appears to prevent any development in Northford Close or on the sewage works.

The Wootton and St Helen Without Neighbourhood Plan 2018 - 2031 (the Wootton and St Helen Plan) has been submitted to the District Council and comments from the local community and statutory consultees were welcomed by the 16 November 2018. The Wootton and St Helen Plan includes a policy for 'Strategic Green Gaps' such as those between Shippon and Wootton, between Whitecross and Lamborough Hill, and between Whitecross and Dalton Barracks.

The 'Strategic Green Gaps' identified on pages 57- 62 are all much smaller in width than the Golf Course (noting that none of the gaps comprise a golf course unlike at Shrivenham).

A more flexible wording of Policy DS1 is considered warranted and would assist in finding a solution to the unsustainable financial status of the Golf Course, which will mean this Green Infrastructure asset can be maintained, providing a buffer of landscaped green amenity grassland space between Shrivenham and Watchfield with a comprehensive landscaping scheme including broadleaved and coniferous trees for both the limited development and the Golf Course, in a way which could achieve an enhancement of the views, limited as they are, and maintain a meaningful gap.

Suggestions:

All open space should have a purpose and be of the size, location and form appropriate for that use. In the case of a settlement gap between Shrivenham and Watchfield to include the whole of the Golf Course does appear to be of an excessive size to serve the purpose to providing a buffer of landscaped green space. The LPP2 has deleted all of the 'Important Areas of Open Land' that are identified in the Local Plan 2011 and to which Policy NE10 applies, Policy NE10 being replaced by Development Policy 29. The Plan does appear to be trying to introduce gaps that have not hitherto been seen as important in the District Council's progress of LPP1 or LPP2, the District Council favouring a more flexible and positive policy wording.

The suggestions are that:

- **for clarity the Plan identifies the areas to which Policy DS1 relates by outlining them, including on Figure 4.1; and**
- **Policy DS1 is made more flexible and positively worded to: *"Development proposals shall respect the countryside setting of Shrivenham village in the gaps between it and Watchfield village, Bourton village, Longcot village and Swindon. Development will be permitted unless it has a significant adverse effect on the purpose and function of the gaps, or on the character or views of the gaps as set out in the Landscape Character Assessment."***

I hope these comments and suggestions help and believe that the suggested changes will help to better achieve the objectives of the Plan, whilst at the same time maintain and enhance a meaningful gap between Shrivenham and Watchfield. In the light of the unsustainable financial status of the Golf Course it is hoped that these suggested changes are included in the submission Plan so that the Golf Course can be 'saved' and its facilities improved.

Yours sincerely,

Paul Butt BA(Hons) DipUP DipUD MRTPI
Paul Butt Planning Ltd



RTPI

mediation of space · making of place

Chartered Town Planner

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

Title	Mr Butt
Name	Paul Butt
Job title (if relevant)	-
Organisation (if relevant)	Paul Butt Planning Ltd
Organisation representing (if relevant)	Owners of the land comprising Shrivenham Golf Course
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Response 9

Respondent Details

Information	
Respondent Number: 9	Respondent ID: 128240578
Date Started: 02/10/2019 10:51:37	Date Ended: 02/10/2019 11:04:42
Time Taken: 13 mins, 5 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

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

<p>Q3. You can upload supporting evidence here.</p>
<ul style="list-style-type: none">File: Natural England Response.pdf - Download

Your details and future contact preferences

Date: 30 September 2019
Our ref: 291193



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BY EMAIL ONLY

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Dear Sir/Madam,

Planning Consultation: Shrivenham Neighbourhood Plan - REG 16 - CONSULTATION REQUEST

Thank you for your consultation on the above dated 6 August 2019.

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 our interests would be affected by the proposals made.

In our review of the Shrivenham Neighbourhood Plan we have no further comments to make.

Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.

Yours sincerely

Lauren Schofield
Adviser
Sustainable Development
Thames Team

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

Natural Environment Information Sources

The [Magic](http://magic.defra.gov.uk/)¹ 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 [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. 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](#)⁴.

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/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/)⁶, which contains more information about obtaining soil data.

Natural Environment Issues to Consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

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

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan 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.

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](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. 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 and habitat

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances

Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve and enhance biodiversity. The NPPF section 170 states "*Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity...*". Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric¹³ and the environment bank biodiversity impact calculator¹⁴. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

¹⁴ <http://www.environmentbank.com/impact-calculator.php> , and http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbI0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJJQ_UN0044Qe6rmiLffxckg

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 170. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹⁵.

Green Infrastructure, Improving Your Natural Environment.

Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces.
- Restoring a neglected hedgerow or creating new ones.
- 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.
- Considering how lighting can be best managed to encourage wildlife.
- Adding a green roof or walls to new or existing buildings.

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 in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁶).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, 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).

¹⁵ <http://publications.naturalengland.org.uk/publication/35012>

¹⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. Please refer to <http://livingroofs.org/> for a range of innovative solutions.

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

Natural Environment Information Sources

The [Magic](http://magic.defra.gov.uk/)¹⁷ 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 [here](#)¹⁸.

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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/)²¹ website and also from the [LandIS website](http://www.landis.org.uk/)²², 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)²³ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)²⁴ sets out supporting guidance.

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

¹⁷ <http://magic.defra.gov.uk/>

¹⁸ <http://www.nbn-nfbr.org.uk/nfbr.php>

¹⁹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

²⁰ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

²¹ <http://magic.defra.gov.uk/>

²² <http://www.landis.org.uk/index.cfm>

²³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

²⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan 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.

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](#)²⁵), such as Sites of Special Scientific Interest or [Ancient woodland](#)²⁶. 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 and habitat

You'll also want to consider whether any proposals might affect priority species (listed [here](#)²⁷) or protected species. Natural England has produced advice [here](#)²⁸ to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances

Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states "*the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible*". Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric²⁹ and the environment bank biodiversity impact calculator³⁰. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

²⁵<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

²⁶ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

²⁷<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

²⁸ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

²⁹ <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

³⁰ <http://www.environmentbank.com/impact-calculator.php> , and http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbI0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJJJQ_UN0044Qe6rmiLffxckg

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 our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)³¹.

Green Infrastructure, Improving Your Natural Environment.

Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces.
- Restoring a neglected hedgerow or creating new ones.
- 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.
- Considering how lighting can be best managed to encourage wildlife.
- Adding a green roof or walls to new or existing buildings.

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 in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)³²).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, 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).

³¹ <http://publications.naturalengland.org.uk/publication/35012>

³² <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions.

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

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Response 10

Respondent Details

Information	
Respondent Number: 10	Respondent ID: 128241089
Date Started: 02/10/2019 11:05:49	Date Ended: 02/10/2019 11:08:58
Time Taken: 3 mins, 9 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

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

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: Gladman response.pdf - Download

Your details and future contact preferences

Shrivenham Neighbourhood Development Plan

Regulation 16 Consultation

Submission Version



September 2019

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Appendices

Appendix 1 – Site Location Plan

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs. These representations provide Gladman's response to the current consultation on the submission version of the Shrivenham Neighbourhood Plan (SNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

1.1.2 As the Councils are aware, Gladman is promoting within the neighbourhood area, Land North of Townsend Road, Shrivenham for residential development. The site is a well-defined logical extension to Shrivenham and when the land to the south is built out, this site will be surrounded by residential development to the east and south, with the A420 providing a robust western boundary. The site is a sustainable location for residential development and, as such the policy framework of the SNP should not be seeking to restrict this site from coming forward to meet future housing needs. In line with PPG which states that a neighbourhood plan can allocate sites additional to those in a local plan,¹ and with the adopted Vale of White Horse Local Plan supporting sites allocated in a neighbourhood plan, we consider the Shrivenham neighbourhood plan opting not to allocate sites for development to be a missed opportunity to plan for additional housing to meet the future needs of Shrivenham and the wider district.

1.1.3 Through these representations, Gladman provides an analysis of the SNP and the policy decisions promoted within the submission draft of the Plan. Comments made by Gladman through these representations are provided in consideration of the SNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG².

1.1.4 These representations will focus on the following matters:

- Legal compliance;
- National Planning Policy and Guidance;
- Neighbourhood plan policies; and
- Site submission.

¹ Paragraph: 044 Reference ID: 41-044-20190509

² Section ID: 41

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 As context, before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions, set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the SNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.1.2 Thus, during the preparation of the neighbourhood plan it is important for the Steering Group to ensure that the policies contained in the Plan are in accordance with the Basic Conditions as set out above. If regard has not been given to the basic conditions through the drafting of policies that are to be contained in the neighbourhood plan, then there is a risk that the policies may be found inconsistent with the basic conditions when the plan reaches independent examination and may be unable to proceed to referendum.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF (2018) consultation. This version was itself superseded on the 19th February 2019, when MHCLG published a further revision to the NPPF (2019) which implements further changes to

national policy, relating to the Government's approach for Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of 'deliverable' in Annex 2.

- 2.2.2 The NPPF (2019) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans within which locally prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

- 2.2.3 Paragraph 14 further states that:

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

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

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

c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and

d. The local planning authority's housing delivery was at least 45% of that required over the previous three years."

- 2.2.4 The NPPF (2019) also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood

plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

- 2.2.5 In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that it is compliant with the basic conditions and other legal requirements before it can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

2.3 Planning Practice Guidance

- 2.3.1 Following the publication of the NPPF (2018), the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.
- 2.3.2 A draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the emerging Local Plan is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against.
- 2.3.3 Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan³. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.
- 2.3.4 It is important that the neighbourhood plan sets out a positive approach to development in the area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that;

³ PPG Reference ID: 41-009-20160211

“A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlements will need to be supported by robust evidence of their appropriateness.”

- 2.3.5 Accordingly, the SNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

- 3.1.2 The adopted Development Plan relevant to the preparation of the Shrivenham Neighbourhood Plan, and the Development Plan which the SNP would currently be tested against, consists of the Vale of White Horse District Council Local Plan 2031 Part 1 Strategic Sites and Policies, adopted in December 2016. This plan sets out the spatial strategy and strategic policies for the district to deliver sustainable development. It identifies the number of new homes and jobs to be provided in the area for the plan period up to 2031.

- 3.1.3 Within this plan Shrivenham is designated as larger village where there is a presumption in favour of sustainable development within the existing built area. Development outside the existing built area will be permitted where it is allocated by the Local Plan 2031 Part 1 or has been allocated within an adopted Neighbourhood Development Plan or future parts of the Local Plan 2031. This development must be adjacent, or well related, to the existing built area of the settlement. The site Gladman are promoting meets these criteria and could have been allocated in the SNP.

3.2 Emerging Development Plan

- 3.2.1 Vale of White Horse District Council have been working on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites (LPP2). This plan complements the Part 1 plan and sets out policies and locations for housing for the Vale's proportion of Oxford's housing need up to 2031. It contains detailed development policies to complement the Local Plan 2031 Part 1, which replace the saved policies of the Local Plan 2011.

- 3.2.2 The plan was submitted for examination in February 2018 and the Planning Inspector issued his final report on the Local Plan 2031 Part 2 to the Council in June 2019. He found the plan sound subject to the recommended main modifications. Until such time that the LPP2 is adopted, the policies within it will carry significant weight. The Council will now seek to make the decision on the adoption of the LPP2 as soon as is reasonably practicable.

- 3.2.3 It is anticipated that this will be adopted prior to the examination of the Shrivenham Neighbourhood Plan and will form part of the development plan that the policies of the SNP will be tested against. This plan contains a number of development management policies that it will not be necessary for the SNP to duplicate and should not in accordance with Paragraph 16(f) of the NPPF (2019).

4 SHRIVENHAM NEIGHBOURHOOD PLAN POLICIES

4.1 Context

4.1.1 These representations are made in response to the current consultation on the submission version of the SNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation highlights the key points that Gladman raises with regard to the content of the SNP as currently proposed.

4.2 Neighbourhood Plan Policies

4.2.1 This section of the representations provides Gladman's comments on the draft SNP policies. As currently proposed, Gladman believes that a number of the SNP's policies require modification/amendment, before they can be considered consistent with the Neighbourhood Plan Basic Conditions.

Vision

4.2.2 The vision for the SNP states that Shrivenham is within an Area of Outstanding Natural Beauty. This is factually incorrect and as such Gladman suggest that this is amended for context.

Strategic Objectives

4.2.3 Whilst Gladman support Strategic Objectives SH2 and SH5, we suggest that the policy framework of the plan does not sufficiently do enough to meet these objectives. As stated later in this representation Gladman suggest amendments will need to be made to the SNP to ensure delivery of these objectives.

Policy DS1: Settlement Gap

4.2.4 This policy identifies three open gaps between Shrivenham and Watchfield Village, Bourton Village and Longcot village. Of these three villages, only Watchfield falls within the neighbourhood area. Therefore, the other two proposed settlement gaps do not appear logical and the boundaries do not form or cover the extent of a gap.

4.2.5 The policy states that development shall only be permitted if it preserves the visual and physical separation of Shrivenham from surrounding settlements. This a restrictive approach conflicting with the requirements of the NPPF (2019) for plans to be prepared positively. Emerging Development Policy 29, likely to be adopted prior to examination of the SNP, would already sufficiently protect the gaps between settlements and would be a consideration when determining any development proposal. The emerging Local Plan Part 2 policy, and proposed modification, reflects that new development can often be located in gaps between settlements without leading to the physical or visual merging of settlements, eroding the sense of separation between them or

resulting in the loss of openness and character. In this instance, Gladman suggest that this policy is deleted.

Policy H1: General Requirements for Development

- 4.2.6 As a general comment, many of the stated requirements are detailed in other policies of the neighbourhood plan, as such there is no need to repeat these requirements here. Further, these requirements are often either set out more restrictively, such as for there to be 'no detrimental impact on views' which does not meet with the requirements, or more vaguely than the detailed policies elsewhere in the SNP. Gladman suggest that parts 2, 3, 4 and 5 should be deleted for this reason.
- 4.2.7 The first part of this policy states that development will be supported provided that it is in accordance with core policies CP3 and CP4 of the VWHDC Local Plan 2031 Part 1. As these policies are already adopted as part of the development plan these policies would already be a consideration for any development proposal. Therefore, there is no need to include this reference and this element of the policy should be removed in accordance with Paragraph 16(f) of the NPPF (2019).
- 4.2.8 Further, this policy states that developments will be supported if they demonstrate that the proposed use of greenfield sites, rather than available brownfield and/or infill sites is necessary. This sets an unwarranted requirement on a prospective developer and does not accord with the NPPF (2019). Whilst the Framework seeks for planning policies to make effective use of land and accommodate objectively assessed needs in a way that makes as much use as possible of previously developed or brownfield land, this should not preclude a sustainable development proposal coming forward on a greenfield site. The Framework goes on to state that substantial weight should be given to the value of using suitable brownfield land within settlements but does not state this should be instead of the use of greenfield.

Policy H2: Housing Mix and Policy H5: Housing for elderly and younger residents

- 4.2.9 These policies encourage developers to provide housing suitable for the elderly as well as affordable starter homes. Gladman support the intentions of these policies, however, suggest that in order to provide this form of housing, it is more likely if it is to come forward alongside market housing.
- 4.2.10 Currently Gladman suggest that the policies of the SNP are not sufficiently meeting the plans objectives to deliver a mix of housing to rebalance the housing stock and encourage the availability of housing for those residents who seek to downsize and for first time buyers wishing to remain in the village. The policy framework of the SNP is restrictive towards further housing development of a scale likely to be able to address these objectives and as such whilst the SNP states strong support for housing for the elderly and first time buyers in reality the plan does nothing to address this issue.

- 4.2.11 Gladman submit that the SNP could have sought to allocate sites with the focus on the delivery of these forms of housing, alongside market housing to ensure delivery of these schemes. The site promoted by Gladman could have been one such site.

Policy H3: Sites within the built up area

- 4.2.12 This policy states that development will be supported where it does not close important gaps or impede local views. It is not clear what are considered to be the important gaps or the local views and as such it is likely that this policy will be applied inconsistently. The NPPF (2019) Paragraph 16(c) states that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. A decision could not currently apply these requirements predictably and with confidence and as such, either modifications should be made that allow for development that considers gaps and views or these elements of the policy should be removed.

Policy D1a: Design features for sites within the built up area.

- 4.2.13 This policy states that new dwellings will 'follow' the VWHDC Design Guide. This approach is inconsistent with the NPPF (2019) as it does not allow for a suitable degree of flexibility and variety where this can be justified. Gladman recognise the importance of good design but there should not be a requirement to follow the Design Guide, as this may stifle innovative design. Gladman suggest that 'are encouraged to follow' should be added to this policy to allow for this flexibility to meet basic condition (a). Further, the VWHDC Design Guide may be subject to amendments during the plan period. As such, Gladman suggest 'or subsequently published guide' is added to the policy wording.

Policy P1b: Parking provision for new developments

- 4.2.14 This policy seeks an increased parking allocation beyond that of the adopted parking standards, in the process setting out overly onerous requirements for parking on new developments. The policy states that as a minimum new development should meet the parking spaces per dwelling set out in Table 8. Whilst these standards could be encouraged the minimum expectation should the standards adopted by the District and County Council's. In seeking an increased level of parking provision, the impacts of such would need to be viability tested to ensure that these standards do not potentially undermine the viability of development proposals.
- 4.2.15 Further, the increased provision is not supported by proportionately robust evidence, 'experience of existing villagers' does not provide justification for this policy requirement.

Policy LC2: Landscape Setting

- 4.2.16 Gladman Support the broad objectives identified within policy LC2 which look to provide appropriate landscaping and planting within developments. We would however urge caution in the inclusion of wording which insists on boundary features being of a height which 'preserves

open views'. There is no specification as to what this entails, and it may be necessary for taller planting schemes to be implemented to reduced landscape impacts.

Policy LC3a: Remote and tranquil settings

- 4.2.17 This policy states that Landscape Areas LCA1, LCA2, LCA3 and LCA5 have been identified as having a tranquil and secluded character in the Landscape Character Assessment and development that is inconsistent with the rural distinctiveness of these areas will be resisted.
- 4.2.18 Gladman are concerned with the conclusions of the Landscape Character Assessment (LCA) relied on to inform this policy, notably how the parcels have been derived. The south-eastern corner of LCA3 is split from the rest of the parcel by the A420, with land to the eastern side of the A420 abutting the built-up area of Shrivenham. This land to the east is split into two fields, with the southern field approved for development (P15/V0663/O) of 116 dwellings, allowed at appeal (APP/V3120/W/15/3141276) in May 2016. In this appeal decision the Inspector concluded that the 'proposed development would not be visually significant in long or medium distance views but that it would be apparent in a localised context on the edge of the village. Any localised harm arising would be of a temporary nature as the proposed landscaping matures and softens the edges the new development.'
- 4.2.19 Once the proposed development site is built out, this will change the character of this area as well as the landscape character in the rest of the parcel to the east of the A420. The east of the A420 will be better related to the settlement of Shrivenham than the rest of the LCA and as such resisting development on the premise that it is inconsistent with the rural distinctiveness and tranquil character is unjustified. The remaining field to the east of the A420, land promoted by Gladman, would accord with Core Policy 4 of the VOWH Local Plan Part 1, as it would be adjacent and well related to the built-up area of Shrivenham.
- 4.2.20 In this regard, Gladman suggest that the Landscape Character Assessment is revisited with land to the east of the A420 excluded from LCA3.

Policy LC4a: Historic Views, Policy LC4b: Valued views and vistas within the village &Policy LC4c: Panoramic views in the surrounding landscape

- 4.2.21 These policies identify a number of historic and valued views and vistas which are sought to be preserved and enhanced.
- 4.2.22 Gladman submits that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of the surrounding area to provide new views and vistas.
- 4.2.23 In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. These policies must allow a decision maker to come to a view as to whether particular

locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance, based solely on community support.

- 4.2.24 Views can change annually, seasonally, monthly, daily and even hourly. Table 9 – Table of Valued Views and Vistas, provide vague information in respect of the identified views and does not provide detailed, substantive evidence in respect of the precise nature of views to be protected. As a consequence, it is not clear how the strict requirements of these policies might be interpreted by a decision maker, having regard to Paragraph 16 of the NPPF (2019).

HE2c: Maintenance of planted areas including buffers and planting

- 4.2.25 This policy is seeking for development proposals to include arrangements for the ongoing maintenance of and future replanting of planted areas within sites so that there is a clear ongoing responsibility and ongoing funding for this. This could be interpreted as meaning this should be provided in perpetuity. Instead, the policy should be seeking to set out timeframes for such a management plan.

Policy CSH1b: Infrastructure Development

- 4.2.26 Gladman appreciate that new development may necessitate the provision of additional supporting infrastructure. However, it is standard practice for development to fund infrastructure in stages as the initial outlay for new infrastructure prior to occupation may be significant enough to render a proposal unviable. We would therefore suggest that this policy is amended to – any new residential development will be required to deliver sufficient supporting infrastructure alongside the proposals to ensure adequate support is in place.

Policy H4: Preferential access to housing, Policy CSH3: Requirement for a CEMP (Construction Environment Management Plan), Policy CSH4: Waste Hierarchy (SNP-WH) & Policy DP1: Delivery and Pre-application engagement

- 4.2.27 These policies are not related to the use of land use. Neighbourhood Planning PPG⁴ states that:

'Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan.'

- 4.2.28 Therefore, Gladman suggest that they should therefore be moved to the community aspirations section of the neighbourhood plan.

⁴ Paragraph: 004 Reference ID: 41-004-20190509

5 SITE SUBMISSION

5.1 Land North of Townsend Road, Shrivenham

- 5.1.1 Gladman are proposing the allocation of land north of Townsend Road, Shrivenham as identified on Appendix 1. The site is located to the west of Shrivenham and is approximately 4.72 hectares. The surrounding land uses include residential dwellings to the east, land which has recently been granted outline planning permission for housing to the south and the A420 to the west and north.
- 5.1.2 The site is well defined and is a logical extension to the settlement. When the land to the south is built out, it will mean that this site will be surrounded by residential development to the east and south, with the A420 to the west and north.
- 5.1.3 Shrivenham has a good range of facilities which are within walking and cycling distance from the site, including a primary school, post office, shop, pubs and places of worship.
- 5.1.4 The site itself is not subject to any formal heritage or environmental designations and is not situated within a Conversation Area. The site has capacity to accommodate up to 85 dwellings with 35% affordable housing. In accordance with the NPPF, the site is deliverable, being a suitable location for development, available now and with a realistic prospect that its development would be fully delivered within 5 years.
- 5.1.5 Gladman is committed to bringing forward the site for development at the earliest opportunity. The Local Plan Part 1 supports sites allocated through neighbourhood plans and PPG is clear that neighbourhood plans can allocate sites additionally to Local Plan allocations.

6 CONCLUSIONS

6.1 Assessment against Basic Conditions

6.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the SNP must be consistent with national planning policy and the need to take account of the adopted development plan. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.

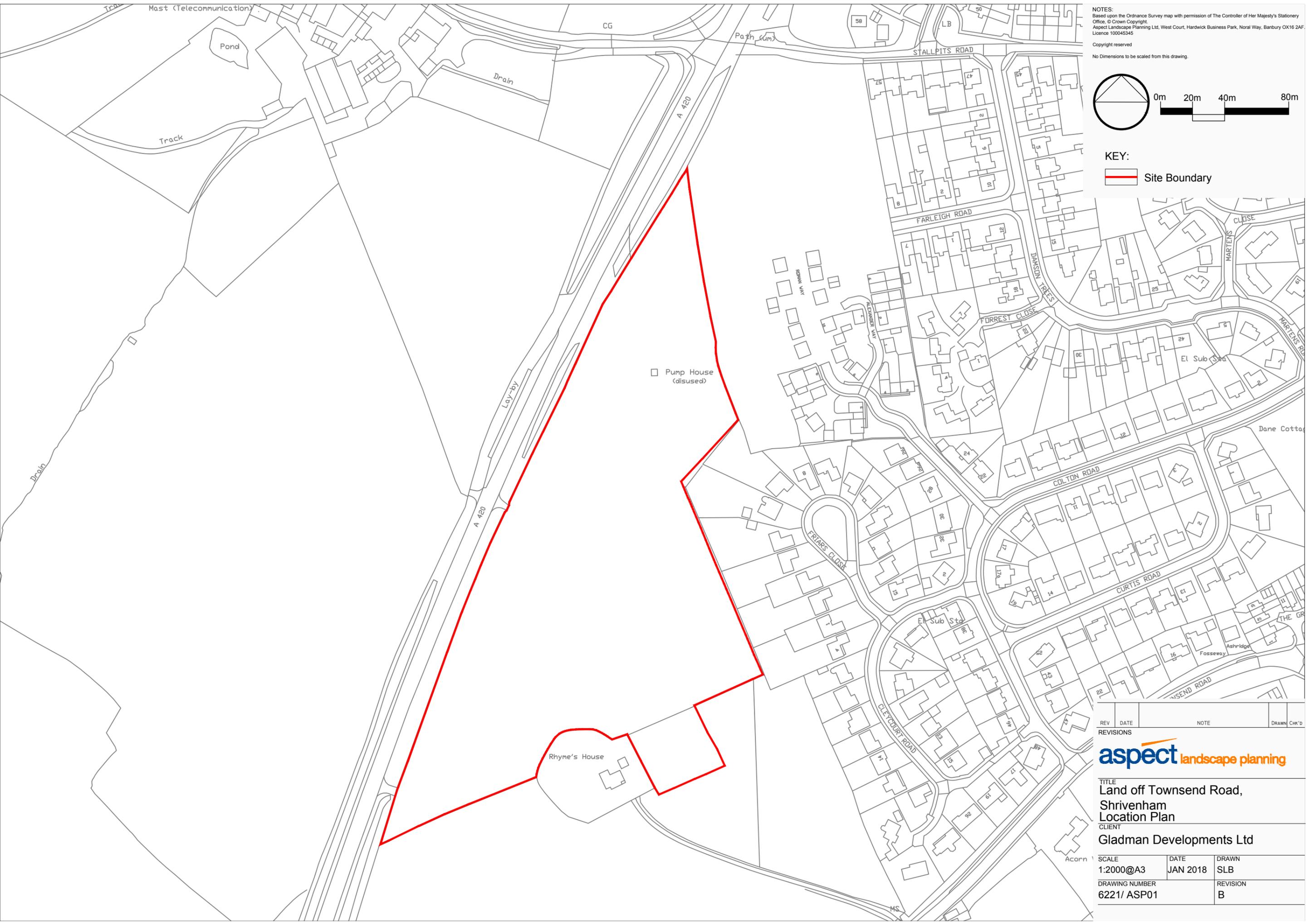
6.1.2 As currently drafted, we submit that the SNP does not meet basic conditions (a) and as such modifications will need to be made to the plan so that it is able to proceed to referendum.

6.1.3 Gladman have included a site submission within these representations. Whilst we note that the SNP is not proposing to allocate sites for residential development we submit that the policy framework of the neighbourhood plan should not be seeking to restrict this site from coming forward for residential development and could in fact be allocating the site to ensure delivery of the strategic objectives of the plan regarding housing.

6.1.4 Should the Examiner open the examination up to hold a public hearing session as part of the examination we respectfully request to be invited to participate at that session.

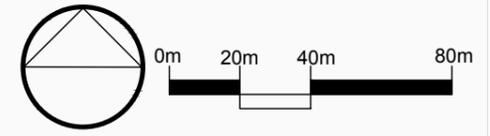
Appendices

Appendix 1 – Site Location Plan



NOTES:
 Based upon the Ordnance Survey map with permission of The Controller of Her Majesty's Stationery Office. © Crown Copyright.
 Aspect Landscape Planning Ltd, West Court, Hardwick Business Park, Noral Way, Banbury OX16 2AF.
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 No Dimensions to be scaled from this drawing.



KEY:
 Site Boundary

□ Pump House (disused)

Rhyme's House

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

TITLE
 Land off Townsend Road,
 Shrivenham
 Location Plan

CLIENT
 Gladman Developments Ltd

SCALE 1:2000@A3	DATE JAN 2018	DRAWN SLB
DRAWING NUMBER 6221/ ASP01	REVISION B	

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

Title	-
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Organisation representing (if relevant)	-
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Response 11

Respondent Details

Information	
Respondent Number: 11	Respondent ID: 128241950
Date Started: 02/10/2019 11:12:54	Date Ended: 02/10/2019 11:29:41
Time Taken: 16 mins, 47 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Agent

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Thank you for consulting Thames Water Utilities (Thames Water) regarding the above. Thames Water are the statutory water and sewerage undertaker for the Vale Of White Horse area and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012.</p> <p>We have the following comments on the Neighbourhood Plan:</p> <p>Paragraph 2.23 – Environmental Factors</p> <p>Issue E9 states that:</p> <p>"It was reported in 2015 by Thames Water that the current sewage network is at capacity. Mitigating measures are required before additional homes are inhabited."</p> <p>Thames Water has been tracking the development and growth in Shrivenham and is currently designing sewerage network reinforcements to accommodate the cumulative flows for all the proposed developments. These reinforcements will ensure that the growth in the catchment will not affect the level of service experienced by existing customers. Thames Water asks to be consulted on all development plans and planning applications to ensure we can continue to track the development and can programme the delivery of the network reinforcement so that capacity is made available prior to the occupation.</p> <p>Paragraph 4.2.9</p> <p>In November 2018 Thames Water requested specific wording to be included in the Neighbourhood Plan. We are pleased to see this wording has been included word for word at paragraph 4.2.9 and as such support this paragraph.</p> <p>Paragraph 4.9.4</p> <p>Paragraph 4.9.4 states:</p> <p>"At the Parish Assembly on 17th April 2018 parishioners overwhelmingly condemned contractors whose workmen drop litter and don't clear it up at the end of the day or job. This has been a common feature around the village both for private contractors, large scale developments and public contractors such as Virgin, Open Reach and Thames Water. Where roads and pavements have been dug up they have been repaired poorly and in many cases verges have been destroyed. The result is that many pavements are no longer 'fit for purpose'."</p> <p>This is 'hearsay' and as such we would request that it be removed from the Neighbourhood Plan document.</p> <p>Should Parishioners have any feedback on Thames Water service or contractors we would request and welcome that this is reported formally so that it can be dealt with accordingly.</p>

Your details and future contact preferences

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

Title	-
Name	Tasha Hurley
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Organisation representing (if relevant)	Thames Water
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Response 12

Respondent Details

Information	
Respondent Number: 12	Respondent ID: 128242972
Date Started: 02/10/2019 11:31:07	Date Ended: 02/10/2019 11:41:13
Time Taken: 10 mins, 6 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

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

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none">File: Oxfordshire County Council.pdf - Download

Your details and future contact preferences

County Hall
New Road
Oxford
OX1 1ND

**Director for Planning and Place
– Susan Halliwell**

1 October 2019

Planning Policy
Vale of White Horse District Council
By email only:
planning.policy@whitehorseDC.gov.uk

Copy: clerk@shrivenham.org

Dear Planning Policy

**Shrivenham – Submission Neighbourhood Plan
Comments to be forwarded to Independent Examiner**

Please find attached County Council comments on this neighbourhood plan. This follows comments made on the draft neighbourhood plan on 16 November 2018. We appreciate the efforts made by the parish council to respond to our November comments and for producing such an excellent document. Due to the holiday period, we have not had all internal responses, but we think that the following letter identifies all our comments. The comments are designed to be helpful to the Examiner in his or her consideration of the Basic Conditions.

The neighbourhood plan advises that 861 new homes have been granted permission in the area since 2011, 180 on appeal (1.1.4 p9).

No new site allocations are proposed through the neighbourhood plan.

The Vale of White Horse Local Plan Part 1 allocates one site in Shrivenham which has resulted in outline consents P13/V1810/O for 240 homes and a primary school and P15/V2541/O for 275 homes and other facilities, followed by other detailed consents.

To the west, as noted in the neighbourhood plan (1.2.3 p11) Swindon Borough Council has allocated a strategic development area, the 'Eastern Villages' which provides for over 8,000 homes.

The County Council does not request a public hearing on this neighbourhood plan but would be interested to receive notification of any decision.

Yours sincerely

L Hughes

Lynette Hughes
Senior Planner

Email: PlanningInOxfordshire@oxfordshire.gov.uk

**OXFORDSHIRE COUNTY COUNCIL COMMENTS
SUBMISSION SHRIVENHAM NEIGHBOURHOOD PLAN**

Policies

Policy DS1: Settlement Gap

No comment.

Policy H1: General Requirements for Development

No comment.

Policy H2: Housing Mix

Support. The County Council is involved in provision for Extra Care housing and Care Homes, and supports the encouragement to provide housing suitable for the elderly.

Policy H3: Sites Within the Built Up Area

No comment.

Policy H4: Preferential Access to Housing

No comment.

Policy H5: Housing for Elderly and Younger Residents

Support.

Policy D1a: Design Features for Sites Within the Built Up Area and D1b: Design

No comment.

Policy D2: Style of Buildings in the High Street

No comment.

Policy D3: Provision of support for electric vehicles in new development, extensions and change of use

Support.

Policy D4: Provision of Fibre to premises

Support.

Policy P1a: Design – Parking Layout and Policy P1b: Parking provision for new developments

We advised in our response to the Draft Pre-Submission Plan that the parking standards proposed exceed those set out in Oxfordshire County Council's guidance. More onerous standards in made Neighbourhood Plans may not always be considered necessary in planning terms. The Parish Council's Statement of Consultation identifies that our concerns were noted, but that the standards remain as drafted, as explained in the supporting text.

Policy P2a: Village Centre parking and accessibility and Policy P2b: Village Centre 'park and ride'

We acknowledge the position in these policies which look to support opportunities for improved or additional car parks.

Policy EE1a: Employment sites, Policy EE1b: Business sites and Policy EE1c: Residential Sites

No comment.

Policy EE2: Diversity of Businesses and Services

No comment.

Policy LC1: Protecting the setting of the AONB

No comment, other than to note that the new 2019-2024 North Wessex Downs AONB Management Plan will shortly be available, and the link should be updated to enable reference to the up to date plan.

Policy LC2: Landscape setting

No comment.

Policy LC3a: Remote and tranquil settings and Policy LC3b: Rural landscape setting of Listed Buildings

No comment.

Policy LC4a: Historic Views Policy LC4b: Valued views and vistas within the village and Policy LC4c: Panoramic views in the surrounding landscape

No comment.

Policy LC5: Designation of Green Spaces

We appreciate that reference has been made in the objective to the value of green spaces to encourage physical activities as requested in our comment on the draft plan.

Policy LC6: Creation of new Green Spaces

No comment.

Policy HE1a: Conservation and enhancement of historic features and He1b: Conservation and enhancement of Archaeological features

Support. We appreciate the inclusion of a policy about archaeological features.

Policy HE2a: Green environment – existing trees, Policy HE2b: Green environment – new planting and Policy HE2c: Maintenance of planted areas including buffers and planting

No comment.

Policy HE3a: Hedgerows and trees and Policy HE3b: Ancient Woodland

No comment.

Policy HE4a: Green and Wildlife movement corridors, Policy HE4b: Protection of Biodiversity during development and Policy HE4c: Provision of suitable habitats for indigenous wildlife

No comment.

Policy PROW1: Public Rights of Way, Footpaths and Cycleways

We appreciate and support the changes which have been made to this policy from the draft in light of our comments, and the references to information and plans. We maintain our concern, as noted in our previous comments, that some of the aspirations would require significant funding which may not be able to be achieved through S106 contributions or use of CIL funds; and the proposed conditions on development may not be considered necessary in planning terms.

Policy PROW2: Improving Access for the mobility impaired

Support.

Policy CSH1a: Community Facilities and Policy CSH1b: Infrastructure Development

We appreciate the inclusion of a reference to multi-purpose community facilities as sought in our comments on the draft plan. We also appreciate the widening of Policy CSH1b, recognising the importance of infrastructure.

Policy CSH2: Memorial Hall

No comment.

Policy CSH3 Requirement for a CEMP (Construction Environment Management Plan)

No comment.

Policy CSH4 Waste Hierarchy

We appreciate the inclusion of this policy which may in part result from our comment on the draft plan that there was inclusion of waste and recycling issues in the PEST analysis and SWOT analysis but that we would welcome consideration as part of the environmental objectives of how future developments can be planned to ensure waste is managed according to the hierarchy of reducing, reusing and recycling. It is not clear to us how this policy will be applied and that we would ask that the Examiner considers this.

Policy DP1: Delivery and Pre-application engagement

No comment.

Community Aspirations

Aspiration CA1: Public transport access to local secondary schools

We note the aspiration and the supporting text which advises that currently the S6 bus route from Swindon to Oxford via Faringdon is the only form of public transport service into and out of the village, and this means that children wishing to attend secondary schools other than Faringdon Community College must rely on private transport. Provision of a bus from Shrivenham to Wantage would enable greater choice for parents. The inclusion of this aspiration helps Oxfordshire County Council in its consideration of planning applications. There could be opportunities for additional bus services arising over time, for example in the context of planning applications in Swindon's Eastern Villages. This could link in with other priorities, such as providing a service from Swindon or the Eastern Villages via Shrivenham to the Science Vale area.

We also recognise paragraph 5.3 which encourages walking and cycling routes. A separate aspiration could be drafted to refer to this aspiration.

Aspiration CA2: Route 66 bus (now renamed S6)

We note the inclusion of the aspiration to improve the S6 service to include evening services.

Aspiration CA3: Co-operation between businesses

We note the aspiration of cooperation between businesses such as regarding the timing of deliveries to reduce congestion on the High Street.

Aspiration CA4a: Community Youth bus and Aspiration CA4b: Community Youth facilities

We note the aspirations to improve facilities for young people.

Aspiration CA5: Countryside walks and rights of way

We note the aspirations for additional opportunities for walking.

Aspiration CA6: Sheltered Housing

We note the aspiration that should the current primary school site become vacant, the Parish Council will strongly support any proposals to deliver sheltered accommodation for elderly and disabled residents of the village.

Aspiration CA7: Traffic Calming

We note the aspiration for traffic calming measures along Longcot road and Highworth Road. Proposals such as this are normally funded through development or could potentially be funded by the Parish Council's portion of CIL.

Aspiration CA8a: 'Herring bone' parking and cycle stands and Aspiration CA8b: Timed parking and delivery timing.

We note the aspirations for improving parking.

Aspiration CA9: Application of Community Infrastructure Levy funds

We note the aspiration, and reference to the appendix which may be updated over the life of the NDP, for what Shrevenham Parish Council wishes to use any financial contributions on.

Other Text

Vision – The text 'to cater for the elderly and/or people with special needs' is very specific and should be deleted. It is sufficient to have the Aspiration CA6 noted above.

2.2.4 Socioeconomic Factors – S11 - The last sentence is incorrect as it refers to an 'additional' primary school. This should be rephrased to read: 'A site for a new primary school building, involving a relocation of the existing primary school, is provided for on the strategic site allocated in the Local Plan Part 1, at the time of writing details have yet to be finalised'.

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

Title	-
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Response 13

Respondent Details

Information	
Respondent Number: 13	Respondent ID: 128245111
Date Started: 02/10/2019 12:00:29	Date Ended: 02/10/2019 12:04:47
Time Taken: 4 mins, 18 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Shrevenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Thank you for consulting Historic England on the submission version of the Shrevenham Neighbourhood Plan. I am happy to confirm that we do not have any matters of concern to bring to the examiner's attention within areas of interest to Historic England. We feel the plan has been well prepared and includes policies that are responsive to the plan area's historic, architectural and archaeological interest and distinctiveness. In particular we find the policies relating to protecting the rural character of the plan area, including developments on the rural edges of the village and the use of the village character statement, which we find to be a useful and accessible document. We are also pleased to see that the community have identified a short list of non-designated heritage assets within their area, which we consider to be an important contribution of neighbourhood planning to the management of the historic environment.</p>

Your details and future contact preferences

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

Title	-
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Organisation representing (if relevant)	-
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Response 14

Respondent Details

Information	
Respondent Number: 14	Respondent ID: 128245508
Date Started: 02/10/2019 12:06:06	Date Ended: 02/10/2019 12:14:25
Time Taken: 8 mins, 19 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>POLICY H5</p> <p>Jack B Developments strongly supports the recognition in policies H2 and H5 that the Council will encourage starter homes to be developed at Shrivenham. At present policy H5 caveats this by stating that this is "...provided that these developments are conform to the other policies of the NDP."</p>

<p>Q4. If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>It is requested that the policy be slightly revised to add additional text to the end of the policy to refer also to the NPPF, since it provides specific guidance on meeting the needs of first time buyers (eg paragraph 71) and delivering starter homes (see definitions). Thus as amended the policy would read:</p> <p>"Policy H5 Strong support will be given to developments that offer houses specifically for elderly residents and starter homes for first time buyers provided that these developments are conform to the other policies of the NDP and the NPPF."</p>

Your details and future contact preferences

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

Title	-
Name	Simon Gibson
Job title (if relevant)	Business Development Director
Organisation (if relevant)	Jack B Development Ltd
Organisation representing (if relevant)	-
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Response 15

Respondent Details

Information	
Respondent Number: 15	Respondent ID: 128246326
Date Started: 02/10/2019 12:17:36	Date Ended: 02/10/2019 12:21:29
Time Taken: 3 mins, 53 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Individual

Your comments

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

<p>Q3. You can upload supporting evidence here.</p>
<ul style="list-style-type: none">• File: Michael East response.pdf

Your details and future contact preferences

Shrivenham Neighbourhood Plan

Vale of White Horse District Council consultation

my comments on the Plan

name: Michael East
both in a personal capacity and partner of Home Farm Partnership.

address:

email address:

telephone:

I previously submitted comments in response to the Pre-Submission Consultation conducted in the autumn last year 2018. Some of my comments were acted upon, some noted but no action taken. I now wish to comment on the Shrivenham Neighbourhood Plan that has been submitted to the Vale.

Page 40 of 83

Fig 4.1 Map demonstrating settlement gap & Para 4.2.3

Para 4.2.3 has appeared since the Pre-submission Consultation document. Considering the massive resistance within the village to the eastern expansion of Swindon I do not see why LCA 2 is not also included in para 4.2.3 and marked in on plan 4.1. I propose it should be.

There has been an error in marking up Fig 4.1. Area LCA 3 – the gap that separates the village from Swindon as included in the wording in para 4.2.3 has been omitted from plan 4.1. It needs to be marked in.

Local Green Space

Page 61 of 83

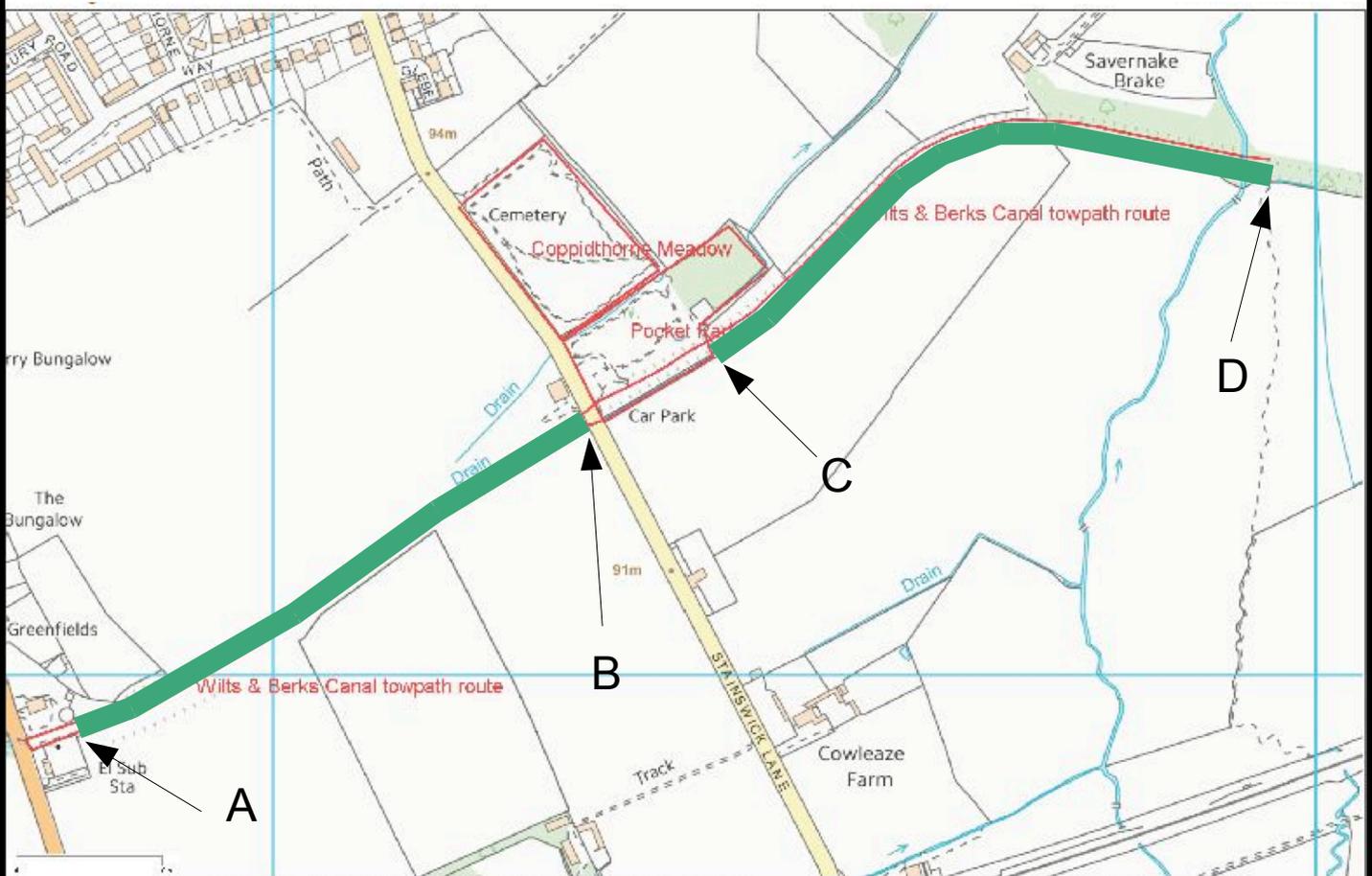
I object to Fig 4.23 – “Showing Coppidthorne Meadow, the Pocket Park and the route of the Wilts and Berks canal towpath”

In the previous Neighbourhood Plan Consultation in late 2018 I previously commented that I was not happy for land belonging to Home Farm Partnership to be included as Local Green Space. I am grateful that those areas have now been removed.

However I am still not entirely happy with Fig 4.23 as it has been presented. The label on Fig 4.23 “Wilts & Berks Canal towpath route (N side only)” is misleading as there is in fact no towpath on the north side of the canal and this needs to be changed in the Neighbourhood Plan document.

Please refer to the plan I included with my previous comments attached, in particular to the Pre-Submission Consultation of site shown on Map 2 (of the Pre-Submission document).

COMMENTS



Date Created: 14-8-2018 | Map Centre (Easting/Northing): 424395 / 188222 | Scale: 1:4737 | © Crown copyright and database right. All rights reserved (100052373) 2018

Plan to show Home Farm Partnership ownership and management of site shown on Map 2

Between points A & B
(marked turquoise):

Home Farm Partnership own and manage the Wilts & Berks towpath route. (the full width of the site)

Between points C & D:
(marked turquoise)

Home Farm Partnership own and manage the Wilts & Berks towpath route. (the southern half of the site which includes the towpath route.)

You will see that between points C & D marked turquoise on the plan Home Farm Partnership own and manage the Wilts & Berks towpath route. Originally in the Pre-Submission Consultation both north and south sides of the canal were included in the site. The south side of the canal (including the towpath) was removed following my comments. Nb. the canal is not a public footpath.

There is in fact no path north of the Wilts and Berks Canal (between points C & D on my plan).

If the north side of the Wilts and Berks Canal is to be included as Local Green Space, it would be better that the label on the map read: "Wilts and Berks Canal (N side only)" omitting reference to the towpath route.

Additionally it would be better if, Fig 4.23 read: "Showing Coppidthorne Meadow and the Pocket Park" omitting the wording "and the route of the Wilts and Berks canal towpath". While there is a short section of the Wilts and Berks canal towpath (120m long) within the proposed Local Green Space, this is wholly within the Pocket Park, so the wording: "and the route of the Wilts and Berks canal towpath" is redundant. Otherwise, the impression given by the red line on the map is that the whole of the 700 + metre towpath route running from Stainwick Lane in the west to Tuckmill Brook in the east (close to point D on my plan) is Local Green Space which is misleading.

I would greatly appreciate the wording to be corrected as I have described.

Having said this, while Home Farm Partnership do not own the Wilts & Berks Canal between on its north side between points C & D on my plan, I do question why it should be included as Local Green Space considering that there are no public footpaths to access the site. I propose this section proposed to be Local Green Space should be removed.

Aspiration CA4b & Paragraph 5.7

I submitted comments in the Pre Submission Consultation previously about this but no action was taken. I will repeat here a cut down version of my comments as I still believe the Neighbourhood Plan should be changed.

Aspiration CA4b and paragraph 5.7 are inadequate and shortsighted. Much greater thought needs to be put into this. I recommend that everything that can be done to get this right in a practical way, or else it will backfire on the village. A half-hearted policy is not enough.

The Neighbourhood Plan has a lifetime up to 2031 - thirteen years into the future. When was the survey of "group of young people aged between 13 – 21 years" conducted? I recall this being publicised in the Parish News a few years ago following the Village surveys in 2014/2015. By 2031 this group will no longer will be young people but adults raising their own children. Their views should not be taken into account.

According to the September 2018 Pre-Submission document permissions have been granted for 861 new homes at the time of publication. Once the developments are built and occupied the households residing in Shrivenham will have virtually doubled.

Shrivenham needs to get ready for the influx of many hundreds of new families with children – teenage children, and considering the lifetime of the Neighbourhood Plan young children that will grow up to be teenagers. The influx has already started. This needs to be addressed as a priority. To hope that children will go to Faringdon taking the Stagecoach bus to see their friends is not a proper response.

The Neighbourhood Plan should prioritise promoting practical solutions as to how to provide for children and young people over the lifetime of the plan. As a basic requirement, teenagers need a few

couches and a place to have a chat, to do their own thing without adults looking over their shoulder. They also have an incredible amount of energy which they need to burn off, and facilities need to be provided for this. Parents need to know their children are in a safe place and not getting into trouble. The building of facilities for young people aged 13-21 north or north west of the village close to where all the new housing is concentrated, or perhaps north east of the village in association with Watchfield could be a good solution. Properly funded, this is precisely what Section 106 money should be for.

The Village Survey 2014 and Village Fete Survey in 2015 included as Appendices 8 & 9 in the Neighbourhood Plan

I also submitted comments in the Pre Submission Consultation previously about these issues but no action was taken. I will repeat here an updated version of my comments as I still believe the Neighbourhood Plan should be changed.

According to para 1.1.4 of the Shrivenham Neighbourhood Plan permissions have been granted for 861 new homes at the time of publication. Once the developments are built and occupied the households residing in Shrivenham will have virtually doubled. As a long term farming resident of Shrivenham, this too for me has been very worrying.

Nevertheless, regarding the Village Survey 2014 and Village Fete Survey in 2015, I believe that I should point out that they were conducted at a time when very different circumstances existed, and it is questionable as to whether they are still valid. At that time of the surveys the Local Plan 2031 was still in preparation and had not been adopted. At the same time the Vale of White Horse District Council were not able to fulfil their 5 year housing supply, and developers were submitting speculative planning applications, which once refused by the Vale were subsequently taken to appeal.

In particular the Taylor Wimpey application which subsequently resulted in permissions for 59 houses granted on appeal to the south of the village created a climate of fear in the village, the Local Plan Strategic Site in the north of the village had not yet been adopted, and the results of the Surveys conducted at the time were skewed by these events.

Since the surveys took place, the Local Plan 2031 has been adopted, and it has set out the spatial strategy for housing in the Vale including Shrivenham. Also since 2014/2015 the vast majority of the permissions for 861 homes have been granted. It means that the results of the surveys are no longer valid as the surveys have been superseded by events.

For example, there was a strong preference by respondents in favour of building to the north of the village. However, the entire space to the north of the village bounded by the bypass has since been taken up with the vast majority of the permissions granted for new homes, which are currently in the process being constructed.

There has been no building to the south apart from the Taylor Wimpey development.

To the east further development is not desirable and the Defence Academy sits in the way, and the need to avoid coalescence with Watchfield.

To the west there has been so many permissions granted for new homes that further development would be excessively far from the village centre, and could form the start of unwelcome coalescence with the Swindon eastern expansion.

It means despite the preference recorded by respondents at the time of the 2014 / 2015 surveys for the village to expand north rather than south, this has been overtaken by events.

I propose the Village Survey 2014 and Village Fete Survey 2015 should be omitted, or in any event it should be stipulated that the Village Survey 2014 and Village Fete Survey 2015 should not be used as a resource on which to base objections to any proposals should further development be possible.

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

Title	-
Name	Michael East
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Organisation (if relevant)	-
Organisation representing (if relevant)	-
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Address line 2	
Address line 3	
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Postcode	
Telephone number	
Email address	

Response 16

Respondent Details

Information	
Respondent Number: 16	Respondent ID: 128246775
Date Started: 02/10/2019 12:23:43	Date Ended: 02/10/2019 12:26:52
Time Taken: 3 mins, 9 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Agent

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>These representations are made on behalf of Oxfordshire County Council Property & Facilities in relation to the Primary School site:</p> <p>The Plan's vision and Objective SCA6 refers to the aspiration to achieve sheltered accommodation on the current primary school site. Whilst the County Council Property & Facilities team recognises the intent in this aspiration it may not be possible to achieve this for economic viability reasons.</p>

Your details and future contact preferences

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

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Response 17

Respondent Details

Information	
Respondent Number: 17	Respondent ID: 128247048
Date Started: 02/10/2019 12:27:15	Date Ended: 02/10/2019 12:29:30
Time Taken: 2 mins, 15 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Organisation

Your comments

<p>Q2. You can provide your comments on the Shrivenham Neighbourhood Plan below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Thank you for consulting the Environment Agency on the Shrivenham Neighbourhood Plan.</p> <p>We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.</p> <p>However, together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p>

Your details and future contact preferences

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

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Organisation representing (if relevant)	-
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Response 18

Respondent Details

Information	
Respondent Number: 18	Respondent ID: 128248088
Date Started: 02/10/2019 12:43:15	Date Ended: 02/10/2019 12:46:44
Time Taken: 3 mins, 29 secs	Translation: English
	Country: United Kingdom

Q1. Are you completing this form as an:
Agent

Your comments

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

Your details and future contact preferences

<p>Q8. After the publicity period ends, your comments, name, email and postal address will be sent to an independent examiner to consider. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses or organisations will be published in full, including contact details. Further information on how we store personal data is provided in our privacy statement.</p>	
Title	-
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OX14 4SB

BY EMAIL: planning.policy@whitehorsedc.gov.uk

30314/A3/CP/NS/SLH/dw

1st October 2019

Dear Sir/Madam,

LAND SOUTH OF SHRIVENHAM
SHRIVENHAM NEIGHBOURHOOD PLAN – REPRESENTATIONS

On behalf of our client, Guy's & St. Thomas Charity, we are pleased to provide you with the following responses to the Shrivenham Neighbourhood Plan consultation. We are instructed by St Guy's and St Thomas Charity to promote land owned by them in conjunction with another landowner.

Introduction

Guy's & St. Thomas Charity (herein after referred to as "our client") has land interests immediately to the south of Shrivenham. This land, (including that owned by another landowner) extends to approximately 33 hectares adjoins the existing urban edge of Shrivenham and its southern boundary is shared with the line of the Wilts and Berks Canal. The eastern part of our client's land falls within the area covered by the Neighbourhood Plan.

Our client wishes to promote its land for development to meet future housing needs. The scale of the proposed development could be up to 700 dwellings and also include the provision of a new linear park alongside the Canal (which would be restored in this particular location as part of their proposals). In addition, provision would be made for a new vehicular access off the A420, new bus stops located at the gateway into the site, pedestrian and cycle links into the centre of the village and a locally equipped play area (including a potential mixed use games area).

Our client has given considerable thought to how its land could provide for the future housing needs of Shrivenham and the wider area within the Vale of White Horse; and how the proposed development of the site presents opportunities to deliver benefits to the local community (including a new linear park along the Canal). This has included initial discussions with Oxfordshire County Council (as Highway Authority) to design a safe and sustainable access to and from Shrivenham.



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To describe our client's site in more detail, together with a summary of the existing planning policy context and a description of the development proposals, a Vision document has been produced and is enclosed with these responses to the Neighbourhood Plan.

These proposals are still at a formative stage in the design process and our client would be very pleased to meet, at an appropriate time, with the Neighbourhood Plan Steering Group in order to present in more detail their vision for the development of their land. An important element of these discussions will be for our clients to receive the views of the Steering Group and to consider how a shared vision for the land to South of Shrivenham could evolve and be taken forward.

Although our client is still at an early stage in their promotion of their land interests at Shrivenham, they have already participated in the Oxfordshire Plan 2050 Call for Ideas consultation and submitted their land for consideration (including the submission of the Vision document).

Given that our client's proposals for its land are concerned with meeting long-term housing needs, our client remains committed to the process of consultation on the Oxfordshire Plan 2050 (which is the relevant Development Plan for the identification of site allocations of the scale envisaged for South Shrivenham). To this end, our client intends to submit consultation responses to the next stages of the Oxfordshire Plan 2050, which are likely to involve: Further Engagement on key technical challenges arising from Reg. 18 Part 1 – scheduled for November/December 2019 and; Consultation on Spatial Growth Options including scale and Broad Locations of Growth (Reg. 18 Part 2) – scheduled for June/July 2020.

On the basis that the Oxfordshire Plan 2050 will identify strategic policies and major allocations for a period of time that will overlap with the Neighbourhood Plan, our client notes that the National Planning Policy Framework seeks to ensure that Neighbourhood Plans do not undermine strategic policies (NPPF para 29). In view of this, although our client notes that the Neighbourhood Plan has been prepared to be complementary with the current adopted VWH Local Plan, the policies and proposals included in the NP should also seek to ensure that it does not prejudice future strategic policies and proposals (which could include the development of land South of Shrivenham).

As part of any future discussions with the Steering Group, our client would be pleased to discuss how the Neighbourhood Plan could be revised in seeking to ensure that it is consistent with local, regional and national policy.

Pursuant to our client's overarching response to the Neighbourhood Plan (as set out above), our client wishes to make the following specific responses:

Wilts and Berks Canal

We wish to support the principle of providing open space alongside the Wilts and Berks Canal which serves the local community at Shrivenham. To this end, we note that at point vii. of Policy LC5: 'Designation of Green Spaces' The Wilts and Berks Canal pathway alongside the pocket park is proposed to be maintained as a Local Green Space. The line of this particular proposed Local Green Space is shown on Figure 4.23 (i.e. land to the east of Stainswick Lane, which is approximately 550 metres to the east of our client's land).

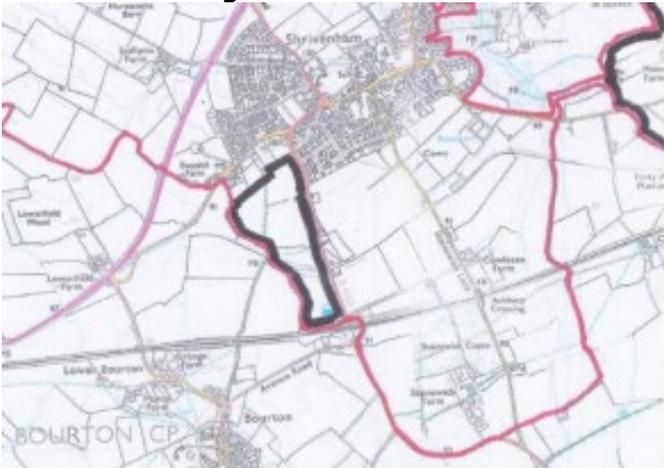
Whilst our client does not wish to comment on the specific nature of this policy (i.e. the designation of Local Green Spaces), we do note that the policy states that "*Development that would improve access to or enhance the use of such spaces will be supported provided that the integrity of the spaces is maintained*"; and that the 'objective' of the policy is "To ensure valued Green Spaces in the village are maintained and to encourage physical activities and healthy food choices".

In this regard, our client wishes to reiterate its support for the future restoration of the Wilts and Berks Canal and, in particular, where the route runs alongside its landholding. As part of its long-term proposals for development on its land, our client intends to restore that part of the Canal which is in its ownership and to provide access to it by the local community through the creation of a linear park.

Policy DS1: Settlement Gap

Our client notes that a Settlement Gap designation is proposed on a linear strip to the south of the village. This proposed designation, as identified on Figure 4.1, would cover land which is proposed by our client for residential development and a linear park (including the part restoration of the Wilts and Berks Canal).

Extract from Figure 4.1:



- The Principle of Settlement Gaps (i.e. Local Gaps)

First, we would like to comment on the principle of the allocation of 'Local Gaps' within the Pre-submission Neighbourhood Plan. There is no basis for the allocation of 'Local Gaps' within National Planning Policy (National Planning Policy Framework or Planning Policy Guidance) nor is there any reference to Gaps within emerging National Policy (Draft Revised National Planning Policy Framework). Indeed, in the context of the NPPF's pro-growth agenda, paragraphs 28-30 which relate to neighbourhood planning, are aimed at delivering sustainable development and getting the right types of development for the community. This makes clear that the role of a neighbourhood plan is not to constrain development and prevent delivery of sustainable development.

To offer further support to the poor foundation for a 'Local Gap' policy, it should be noted the Submission Version of Sonning Common Neighbourhood Plan contained a similar policy which related to 'Gaps between Villages' (Policy DS1). The independent examiner recommended the deletion of this this policy. We also note that in another case, the Inspector for the Wokingham Managing Development Delivery (MDD) DPD recommended the deletion of the Council's Gap policy (CCO2) on the basis that it was "unduly restrictive". The policy was deleted from the MDD prior to its adoption.

As a result, we consider that there should be no designation of 'Settlement Gaps' within the emerging Neighbourhood Plan. The NPPF does not restrict or support 'gaps' or separation in principle.

- Specific Comments

We consider that the designation of the full extent of land shown in the NP for a Settlement Gap would also prejudice the potential allocation in the Oxfordshire Plan 2050 of our client's land for residential development to meet future housing needs.

Having reviewed the evidence which has been submitted with the NP (i.e. the Landscape Character Assessment (LCA) (Lepus, April 2018, Appendix 4), we also wish to note that the authors of the LCA confirm that "*the northern part of this area is strongly connected to the southern part of the village of Shrivenham*" and that "*introducing tall structures into this landscape would be visually intrusive and detract from the wide ranging and expansive views*".

In view of these two comments, we note that our client only proposes to build in locations related to the existing urban edge, which are already well-related to the village; that the proposed new dwellings would be subject to heights constraints (to be agreed through the planning application process); and the new dwellings would be set within the context of a new linear park which would be provided alongside the restored Canal.

As a result, we consider that the Settlement Gap as currently defined is not appropriate or necessary, especially in relation to land most closely related to the village (i.e. to the north of the line of the Canal).

In addition, we note that the line of the Wilts and Berks Canal provides a strong and defensible boundary within which to enclose future development in this location and to maintain long-term physical separation between Shrivenham and Bourton. We also note that there is land to the south of the line of the Canal will remain as open countryside and that the line of the Great Western railway line further enforces the sense of separation between these two settlements.

In relation to the Landscape Character Assessment, which is included at Appendix 4 of the NP, our client also notes that – as part of the proposed future development of its land – it would be in a position to deliver some of the recommendations made by Lepus Consulting on behalf of the Steering Group (see Appendix 4, Paragraph 13.5), such as strengthening field boundaries and assisting the aims of the Canal Trust to protect, conserve and improve the route of the Wilts and Berks Canal.

- Proposed Change:

Our client requests that Policy DS1 is reviewed and the land which is designated as a Settlement Gap is either removed in its entirety or is reduced in scale to remove land to the north of the Wilts and Berks Canal.

- General Comments on the Wilts and Berks Canal

In addition to these comments, our client also requests that the NPs is consistent with Swindon Borough Council's adopted Local Plan 2026 (March 2015), which places importance upon and includes specific policies relating to the safeguarding and protection of the Wilts and Berks Canal (and is based on specific evidence, including: the Restoration of the Wilts Canal Feasibility Study (1998), Swindon Central Canal Route Study (2007) and the Swindon Eastern Development Area WBCT Preferred Canal Route (2012)).

Our client welcomes the opportunity to respond to the Neighbourhood Plan consultation and hopes that its responses are treated as being positive and constructive. Our client would also be very pleased to engage in discussions with the Steering Group/Parish Council about the opportunity which could be afforded by their vision for their land interests to the South of Shrivenham.

Accordingly, please do not hesitate to contact me on 0118 943 0000 or by email craig.pettit@bartonwillmore.co.uk should you have any queries or require further information.

Yours sincerely,

A handwritten signature in black ink that reads "Craig Pettit". The signature is written in a cursive, slightly slanted style.

CRAIG PETTIT
Senior Planner

South

SHRIVENHAM



COMMUNITY ~ RECREATION ~ LIVING



A VISION FOR A SUSTAINABLE NEW COMMUNITY
APRIL 2019



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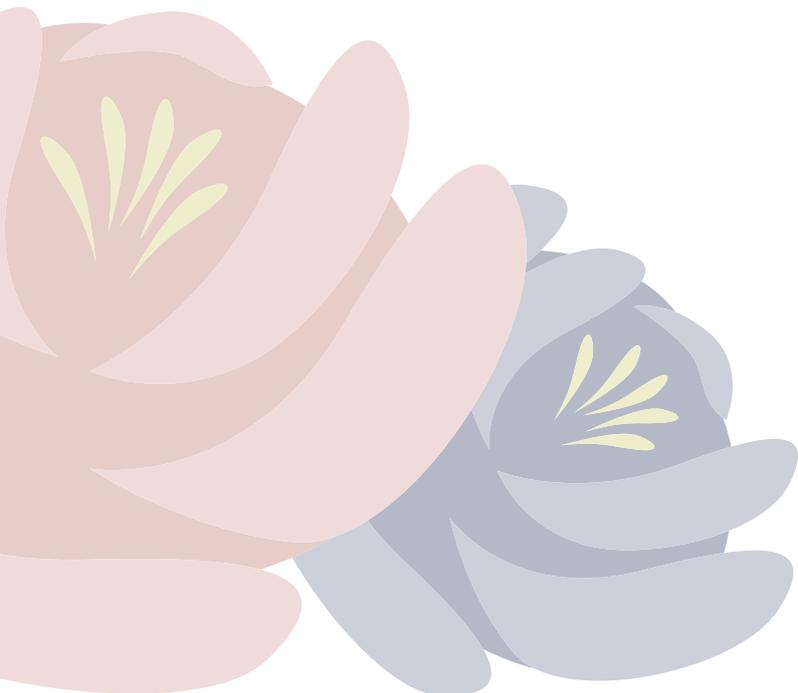
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Document Status:	Draft
Revision:	g
Author:	Various
Checked by:	CP
Authorised by:	CP
Issue Date:	April 2019

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INTRODUCTION

BACKGROUND

Barton Willmore LLP is instructed by our client, Guy's & St Thomas Charity, to submit this Vision Document in response to 'The Oxfordshire Plan 2050 – Call for Ideas' consultation, which is being undertaken collectively by Cherwell, Oxford City, South Oxfordshire, Vale of White Horse, West Oxfordshire with Oxfordshire County Council. It should be noted that, on behalf of our client, we have also submitted written representations to 'The Oxfordshire Plan 2050: Introducing the Plan' consultation, which this Vision Document should be read alongside.

SITE DESCRIPTION

The site is situated to the south of Shrivenham and is bordered to the north by existing development comprising the southern development limits of Shrivenham, to the south by the historic Wiltshire and Berkshire Canal, to the east by Station Road and combination of existing development and agricultural land beyond, and to the west by the A420. Townsend Road dissects the site from north-east to south-west, which is currently the main access route into Shrivenham.

The site comprises open agricultural fields and a small amount of previously developed land. Across the site there are various trees and hedgerows, however these separate land parcels rather than form any main features to the site.



FIGURE 1. SITE LOCATION PLAN

SHRIVENHAM

Shrivenham is a large village within the Western Vale Sub-Area, as noted within the Vale of White Horse Local Plan 2031 Part 1 (Strategic Sites and Policies), herein referred as the VoWH LPP1.

Shrivenham has a good range of services and facilities comprising a primary school, secondary school, supermarket, store/post office, pharmacy, churches, pubs, takeaways and other commercial uses. These are all located near the middle of the village and within walking/cycling distance of the site.

Shrivenham is also situated approximately 5 miles from the centre of Swindon and approximately 5 miles from the centre of Faringdon, offering good access to wider services and facilities. To that end, Shrivenham also benefits from being served by Stagecoach's S6 bus link from Swindon to Faringdon, connecting to Oxford. This runs approximately every 20 minutes from the village centre and connects with Faringdon (15 mins), Swindon (20-27 mins) and Oxford (1hr 5 mins). Buses stop within the village centre and run along Townsend Road, through the middle of the site.



FIGURE 2. SERVICES & FACILITIES PLAN

- | | | | |
|--|------------------|--|----------|
| | Site Boundary | | Pub |
| | PRoW | | Bus Stop |
| | High Street | | Railway |
| | Education | | |
| | Place of Worship | | |
| | Community Hall | | |
| | Allotments | | |
| | Sports Pitches | | |

PLANNING POLICY

PLANNING

LOCAL – VALE OF WHITE HORSE LOCAL PLAN PART 1 (ADOPTED 2016)

As noted Shrivenham is classified within the settlement hierarchy of the VoWH LPP1 as a large village situated in the Western Vale Sub-Area and governed by associated Core Policies 20 (Spatial Strategy for the Western Vale Sub-Area) and 21 (Safeguarding of Land for the Strategic Highway Improvements). It is noted that within the Western Vale Sub-Area there are no Local Service Centres. Therefore Shrivenham and other Larger Villages are second in the hierarchy for the Western Vale Sub-Area, behind the Market Town of Faringdon.

The VoWH LPP1 notes at chapter 4 (Spatial Strategy) that the strategy will support the delivery of sustainable growth through three key strands, one of which is 'promoting thriving villages and rural communities whilst safeguarding the countryside and village character, by':

- Allocating strategic housing growth at our Larger Villages to help maintain their vibrant communities;
- Identifying appropriate housing requirements for the rural areas to inform neighbourhood plans or the Local Plan 2031 Part 2; and
- Focusing development within the rural areas to the Larger Villages, thus helping to maintain their vitality and the sustainability of local services.

Chapter 5 of the VoWH LPP1 in noting 'how the Western Vale Sub-Area will change by 2031' explains that the Sub-Area will continue to be an attractive and prosperous rural area and crucially, that '**development will have been focused at Faringdon with complementary growth in the Larger Villages, especially Shrivenham and Stanford-in-the-Vale**'.

It is clear that further growth at Shrivenham is anticipated as the Evaluation of Transport Impacts Study, prepared to inform the VoWH LPP1, has identified that revised junctions are needed on the A420 at Shrivenham. Core Policy 21 of the VoWH LPP1 has therefore safeguarded land to ensure that necessary upgrades can be delivered. This is visited in more detailed within the Transport Statement that accompanies this Vision Document.

LOCAL – VALE OF WHITE HORSE LOCAL PLAN PART 2 (EMERGING)

We note that the Vale of White Horse District Council have recently consulted on the Proposed Draft Main Modifications provided by the Inspector, with the consultation period closing on 1st April 2019. Given this advanced stage and how the Vale of White Horse Local Plan Part 2, herein referred as the VoWH LPP2, compliments the VoWH LPP1, it is considered pertinent to this submission.

Whilst not discussed here in detail, within chapter 3 of the VoWH LPP2, the Wilts and Berks Canal is noted as an 'important historic feature' and it is also explained that the Wilts and Berks Canal Trust are working to a long-term vision towards the full restoration of the Canal. Given the Canal is to the south of our proposed site and on land owned by our client, it has been given full consideration within this submission.

**REGIONAL –
OXFORDSHIRE PLAN 2050
(EMERGING)**

The Oxfordshire Plan 2050 is the focus of this Vision Document and indeed it is by virtue of the current ‘Call for Ideas’ consultation that this document has been prepared and submitted. As noted, our client has already submitted detailed written representations to the ‘Introducing the Oxfordshire Plan 2050’ consultation. For brevity it is not intended that these are repeated here and we would request therefore that they are read in conjunction within this Vision Document. Notwithstanding this we consider that the following imperative points require a further mention.

The National Infrastructure Commission Report ‘Partnering for Prosperity’ provided a set of figures in relation to the CaMKoX arc and the development required to meeting corridor-level housing need, and pressures from land constrained markets. In relation to the Oxford/Swindon component of the arc, the table below provides the associated figures:

Current known/ planned	Additional to meet corridor need	Additional to meet constrained market need	Total required for Oxford/ Swindon
60,000 homes	170,000 homes	70,000 homes	300,000 homes
110,000 people	318,000 people	130,000 people	558,000 people

Removing the known/planned development figures from the table below, results in an additional requirement figure of 240,000 for the Oxford/Swindon region of the arc, according to the report; an additional requirement of 8,000 per annum to 2050.

The Oxfordshire Plan must therefore identify the quantum and distribution of new economic and residential development that is required to meet national aspirations. This will provide a strategy for Oxfordshire and provide a blue print for future local plans and local plan reviews. In doing so we submit that Shrivenham and specifically our client’s site, is suitability place to contribute to this demand.

ENVIRONMENT

There are no known environmental constraints on or near the site, which would impact its development potential. It is noted that the Canal Bridge along Station Road is Grade II Listed, however this is not within the site boundary and in any event, proposals are looking towards the restoration of the canal.

The main consideration with our clients land therefore is the future interaction it affords with the canal to the south and how this and any other environmental benefits can be incorporated into the proposals.



LANDSCAPE

The site is located to the south of Shrivenham with the linear landscape feature of the historic Wilts and Berkshire Canal forming its southern boundary. The six irregular shaped agricultural fields are located to the east of the A420 road corridor and to the west of the B400 Station Road, with Townsend Road dividing the site into two parcels. In addition to the five arable fields and one pasture field, the site includes two small areas of scrubby grassland immediately adjacent to the former canal.

The fields are lined by hedgerow vegetation, much of which is well maintained although some sections of hedgerow, such as along the B400 are more mature lines of trees and increase the sense of enclosure locally. Vegetation that follows the route of the historic Wilts and Berkshire Canal, is a mixture of shrubs and mature trees that combine to form a linear belt of vegetation.

Land within the site is relatively flat with a slight gradient that slopes down from the northern edge towards the canal at the southern

end. To the north of the site, the land rises slightly with some parts of the existing settlement at Shrivenham located on higher ground. The site and large fields to the south of it are at a similar grade and allow some intervisibility over the site. Views north extend towards the existing settlement of Shrivenham where the residential edge is indistinct amongst vegetation that it is set within and occupying intervening land. Some longer views from the site extend to the south and south-east towards the recognisable landform of the North Wessex Downs AONB.

Views towards the settlement gained along Townsend Road and the B400 Station Road, are channelled along the route of the road by the vegetation that lines them, however, some glimpsed views into and over the site are available at access gates along the field boundaries. The site is relatively open and is entirely undeveloped apart from three barns that are in disrepair that are located on the eastern boundary, adjacent to Station Road, and the small area of previously developed land west of Townsend Road.

Land in the vicinity of the site offers a limited contribution to public accessibility with only a small amount of footpaths, bridleways and recreational land in the area. Footpath 345/11/10 passes through the site and links Shrivenham village centre with the former canal and the important route of Steppingstone Lane bridleway that then connects to Bourton beyond the railway line. The bridleway passes over a recently restored canal bridge that is located within the belt of trees and is combined with the listed canal bridge on Station Road to provide additional heritage value.

The Oxfordshire Wildlife and Landscape Study identifies that part of the site is located within the Watchfield (CR/1) Landscape Character Area, which is within the wider Rolling Farmland Landscape Character Type and part of the site is located within the Uffington (WH/24) Landscape Character Area, which is within the Clay Vale Landscape Character Type. The Landscape Strategy for both the Rolling Farmland and the Clay Vale is to conserve and enhance the pattern of vegetation and tree lined watercourses.



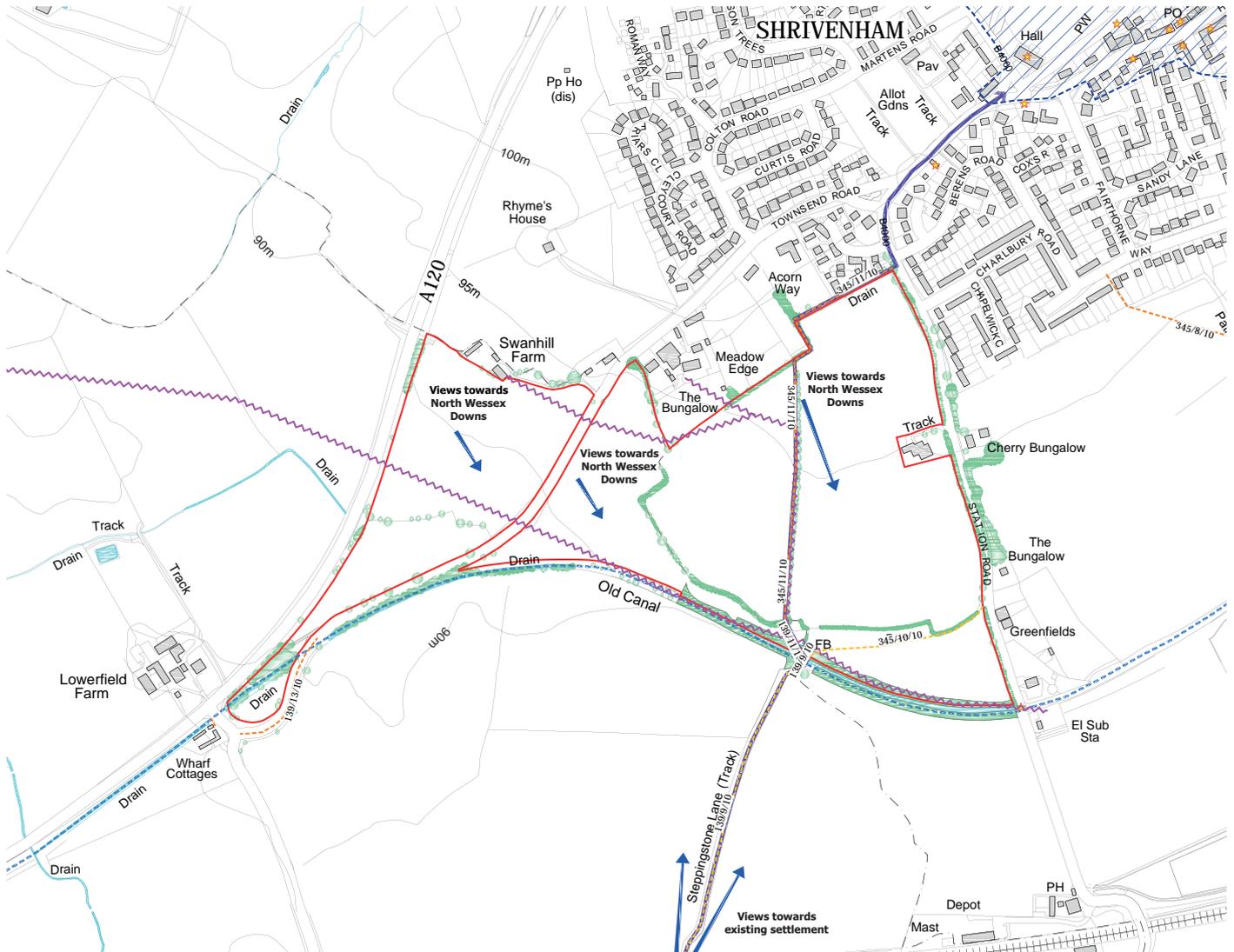
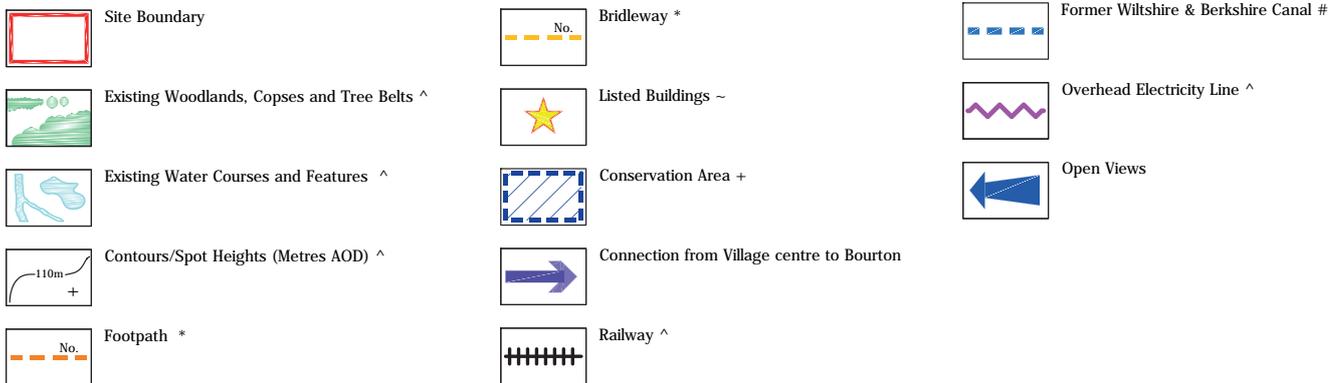


FIGURE 3. LANDSCAPE CONTEXT PLAN



SITE CONSIDERATIONS

THE SITE CONSIDERATIONS COMPRISE THE FOLLOWING:

- Existing trees and hedgerows within the site and along its boundaries;
- The historic Wiltshire and Berkshire canal located to the southern boundary;
- The public rights of way crossing the site;
- Potential noise from the A420 and railway located approx. 400m from the southern boundary;
- Overhead cables crossing the site; and
- Suitability of vehicular access off A420, Townsend Road and station road.



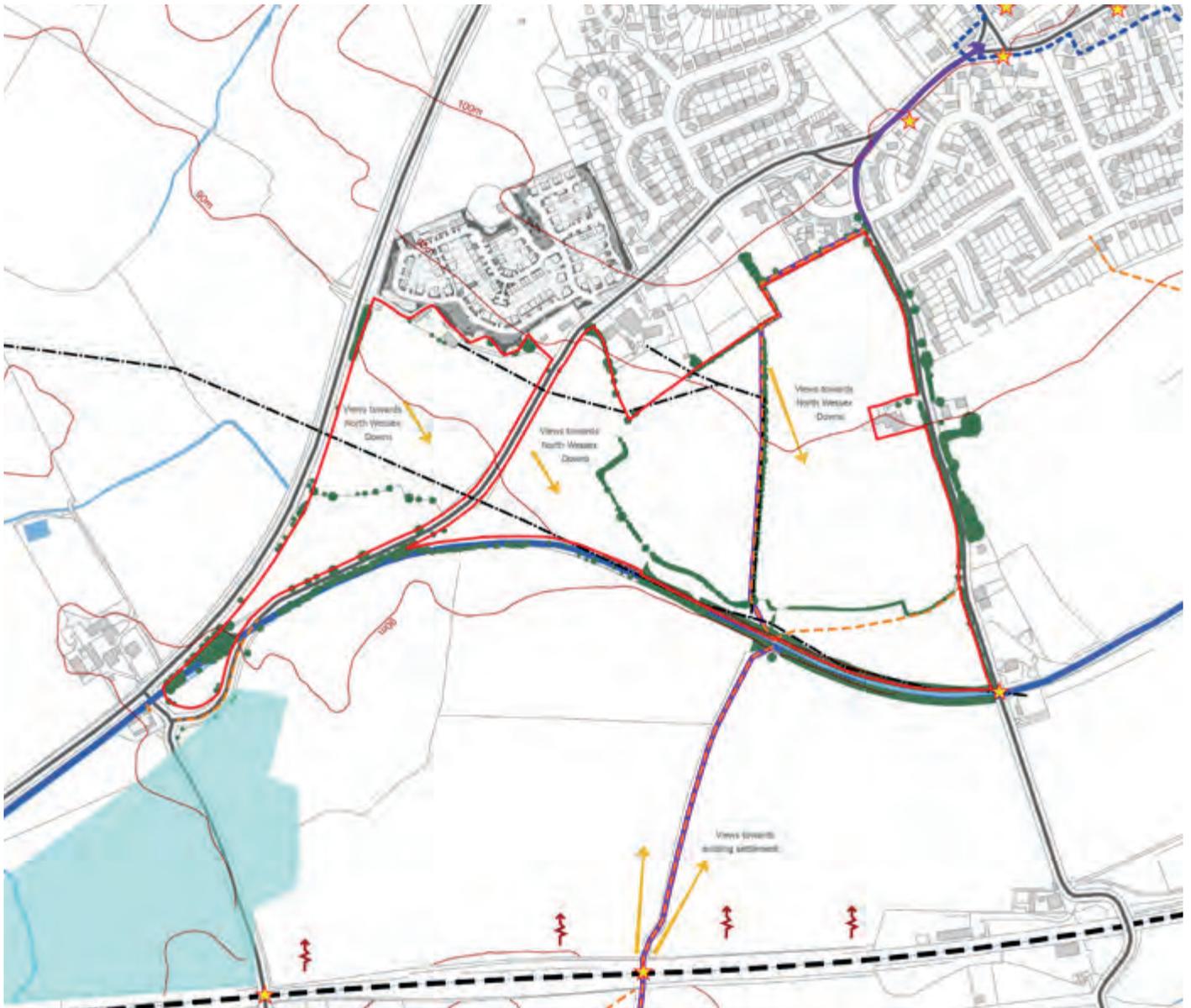


FIGURE 4. SITE CONSIDERATIONS PLAN

- | | | |
|--|---|--------------|
| Site Boundary
- 30.51Ha / 75.40Ac | Railway Line
(Great Western Main Line) | Key Roads |
| PRoW | Potential Noise | Flood Zone 2 |
| Conservation Area | Overhead Electricity Line | 5m Contours |
| Former Wiltshire & Berkshire Canal | Connection from Village Centre to Bourton | |
| Watercourses | Open Views | |
| Existing Woodland, Copses and Tree Belts | Listed Building | |

SITE OPPORTUNITIES

THE SITE PRESENTS AN OPPORTUNITY TO:

- Provide new homes to meet the future needs of Shrivenham, the Vale of White Horse and Oxfordshire;
- Re-instate the historic canal and create an attractive new park, easily accessible for new and existing residents, with increased opportunities for canal-side walks;
- Incorporate and enhance existing public rights of way and improve links to the wider countryside to the south;
- Provide a new access arrangement of the A420 and stop up the existing Townsend Road existing access;
- Provide pedestrian / cycle links into the heart of Shrivenham;
- Provide open space and play provision for new and existing residents; and
- Expand the village up to existing defensible boundaries comprising the A420, old canal and Station Road to create a development edge that respects views from the surrounding landscape.

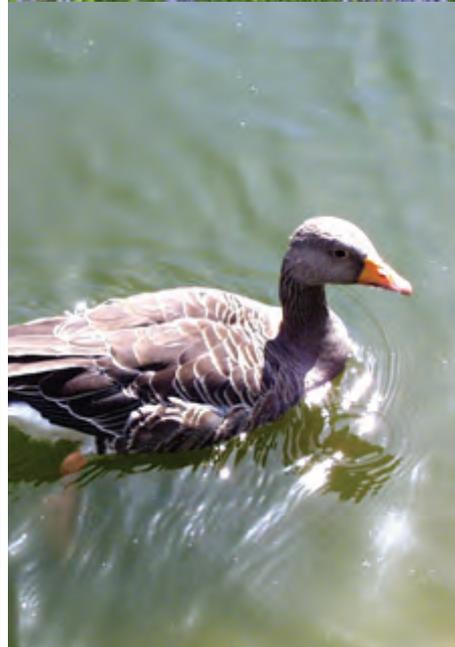




FIGURE 5. SITE OPPORTUNITIES PLAN

- | | | | |
|---|---|---|---|
|  | Site Boundary
- 30.51Ha / 75.40Ac |  | Access Improvements onto
Townsend Road |
|  | Potential Development |  | New Access A420 |
|  | Opportunity to Restore
Wiltshire & Berkshire Canal |  | Create New Gateway into
Shrivenham |
|  | Opportunity to Enhance
Canal with New Linear Park | | |
|  | Enhance Existing PRoW | | |
|  | Improve Pedestrian / Cycle
Links into Shrivenham | | |

THE PROPOSAL

VISION

The land south of Shrivenham will provide quality new homes of all sizes and tenures. The development will also provide high quality public spaces for all to enjoy and accommodate a new linear park incorporating existing landscape and the canal. South Shrivenham could also be designed to minimise the use of car travel and maximise walking, cycling and local public transport use, to encourage healthy living with a high level of community interaction based around existing local facilities.

CONCEPT

New housing located to the south of Shrivenham accessed via the A420 to the west via a new junction arrangement and access from station road to the east. The development also provides an opportunity to create a new southern gateway on Townsend Road into Shrivenham. Areas of play and a new linear park would also be created along the southern boundary of the site, following the alignment of the Wiltshire and Berkshire canal. The new homes will be well-integrated with the village and have direct cycle/walking routes connecting into the existing pavements and footpaths for easy access to the village centre and use the existing amenities.

MASTERPLAN

The development could provide up to 700 new homes, children's play areas, and significant amount of open space, including a new linear park. The initial Concept Masterplan is illustrated on the opposite page.

The key features are:

- Low density housing located along the southern and western edges of the development;
- A new linear park to the south alongside the Wiltshire and Berkshire canal;
- Local Equipped Play Areas (LEAPs) including a potential multi-use game area (MUGA);
- Surface water attenuation basins integrated within the landscape setting to improve and enhance biodiversity;
- Existing public rights of way are retained and enhanced within green corridors;
- A new access arrangement off the A420;
- New alternative access off A420, existing Townsend Road junction could be stopped up;
- Proposed bus stops located at the new development gateway; and
- Pedestrian/cycle links into village centre.

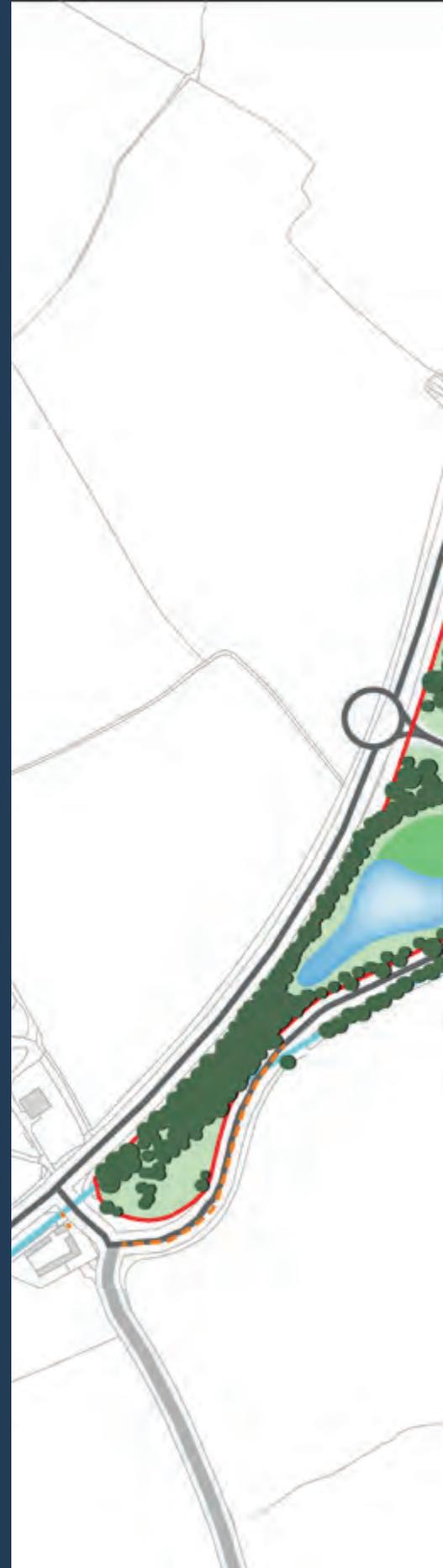




FIGURE 6. MASTERPLAN

KEY FEATURES

1 ENVIRONMENTAL IMPROVEMENTS

The proposed indicative masterplan provides three main areas of environmental benefit to the site:

- Enhanced accessibility and improvements to the public footpath which extends from the south of Shrivenham through the site;
- Opportunities to improve the public open space offer within Shrivenham to complement the existing provision; and

- Opportunities to improve the historic Wilts and Berks Canal and access to it.

Opportunities to introduce various landscape features, such as trees, hedgerows and attenuation ponds.

Via the above environmental improvements it is considered that the proposals could provide for enhanced areas of biodiversity and public enjoyment of the green spaces and canal side routes that will be created.

Currently it could be argued that Shrivenham is somewhat divorced from the historic canal, however these proposals have the ability to improve this connection.



FIGURE 7. CANAL / GREEN LINKS / DRAINAGE

South
SHRIVENHAM

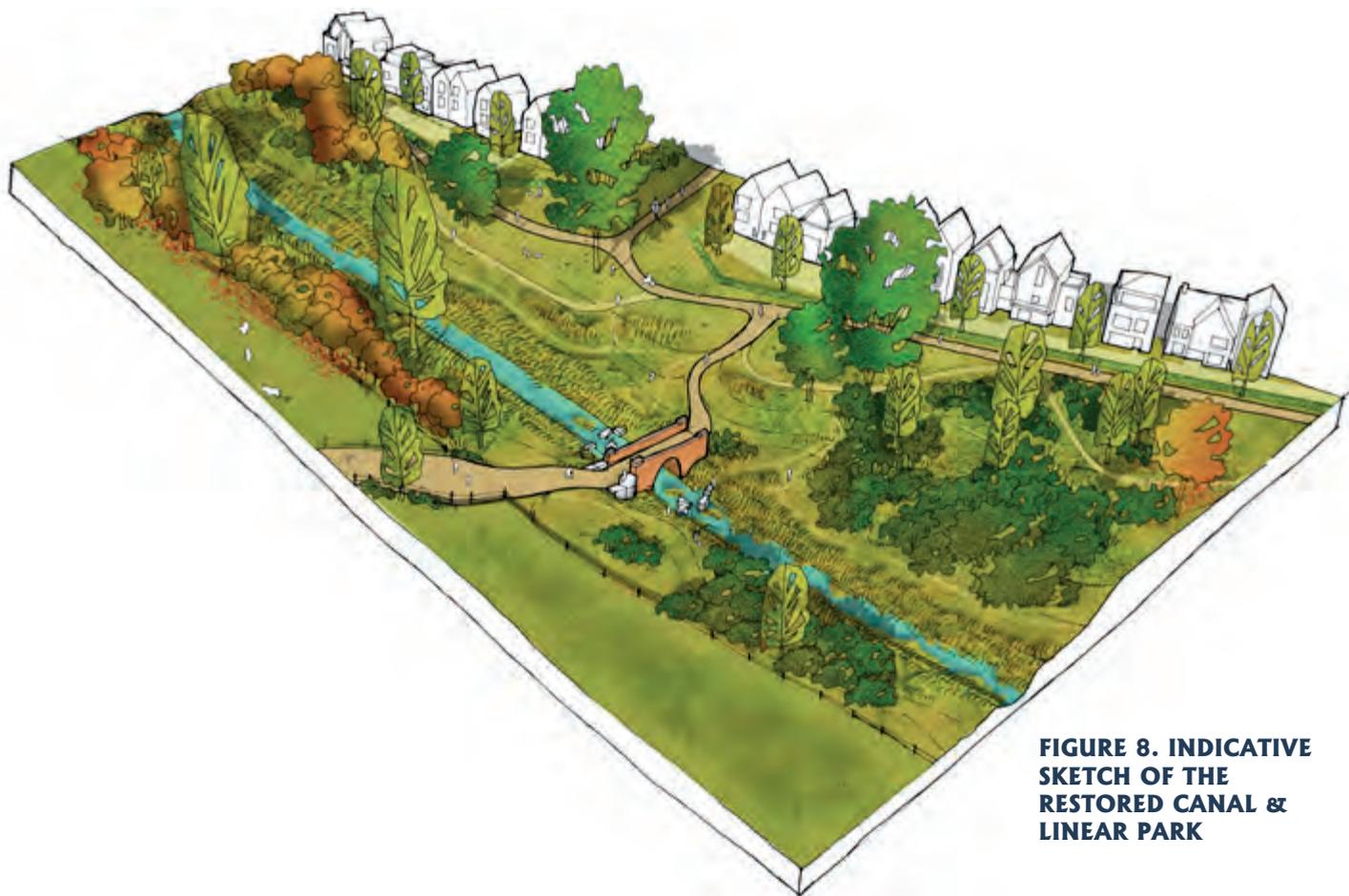
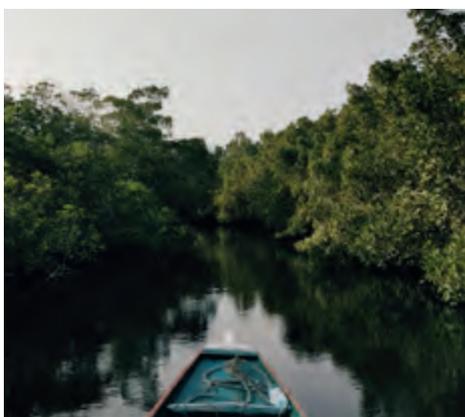


FIGURE 8. INDICATIVE SKETCH OF THE RESTORED CANAL & LINEAR PARK



2 ACCESSIBILITY & SUSTAINABILITY

The facilities on High Street are circa 1km from the centre of the site. To minimise walk/cycle distances to these facilities, the following infrastructure connections would be required, some of which are indicated on Drawing RG-M-05a:

- footway/cycleway connection from north-east corner of eastern site area onto Station Road;
- footway/cycleway connection from north-west corner of eastern site area onto Townsend Road;
- footway/cycleway connection from north-east corner of western site area onto Townsend Road;

- within the site, maintain existing Public Rights of Way on their existing alignment and upgrade to provide all-weather solutions; and
- within the site, provide a permeable footway and cycle network such that walk/cycle distances are less than that by car.

The site presents a unique opportunity for residential development to be brought forward that has direct access to an existing premium bus service, without the need for service diversions that impact journey time for existing patrons. As such, mitigation (in the form of developer contributions) can be used solely to improve service frequency, without any impact of service diversion reducing the benefit that can be gained.

Bus stops could be introduced along Townsend Road such that all dwellings would be within 600m of a bus stop. The majority would be within 400m of a bus stop, in accordance with the advice set out in the Chartered Institution of Highways & Transportation’s publication ‘Planning for Public Transport in Developments’.

The proposed site is considered to be a sustainable location for a new residential development. Given the number of services and facilities that are accessible by walking/cycling, combined with the proximity to the premium bus route providing high frequency bus services between Swindon and Oxford, future residents would have realistic alternatives to the private car.

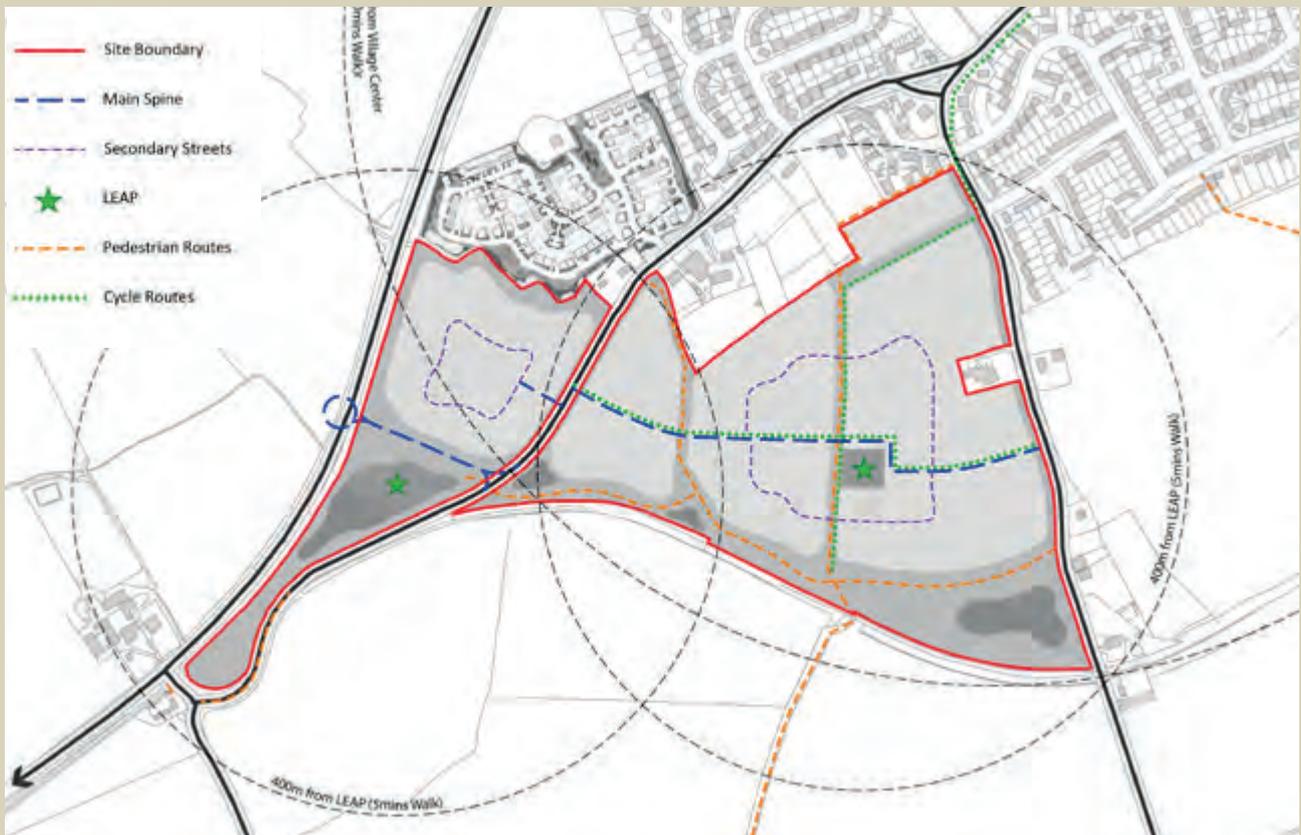


FIGURE 9. MOVEMENT PLAN

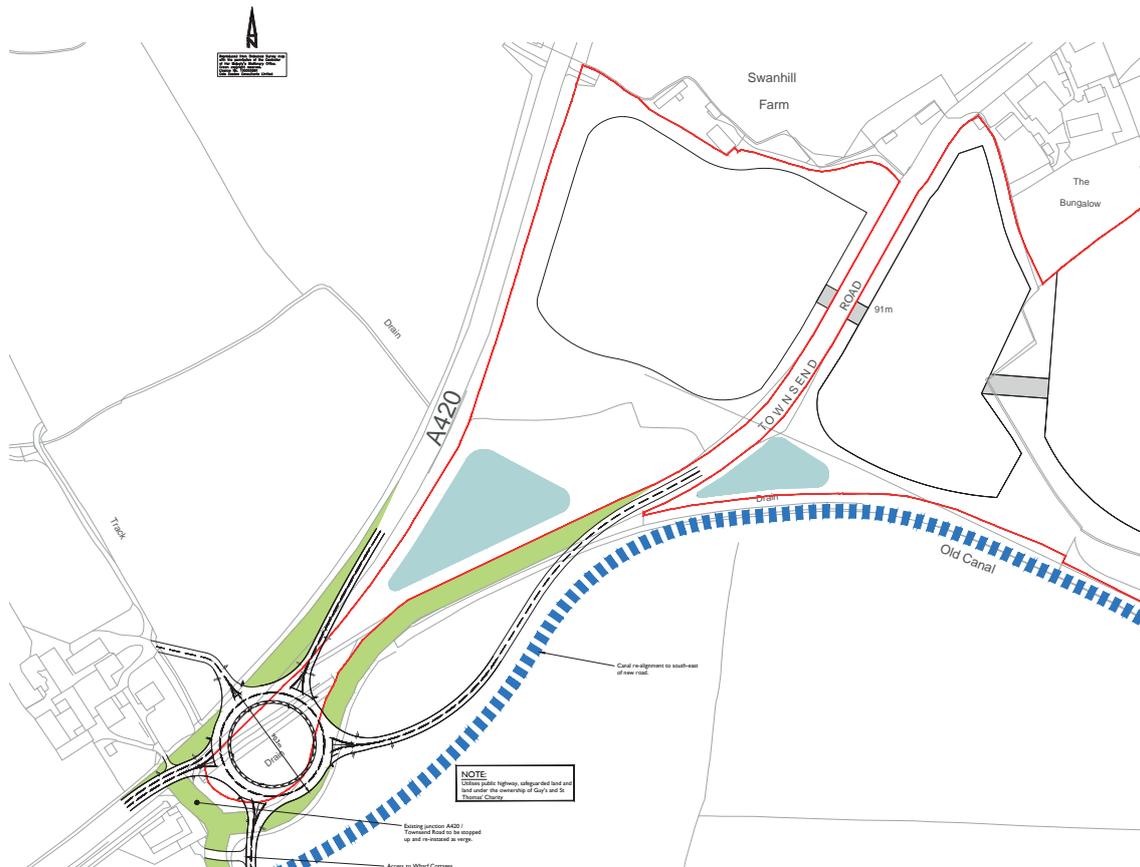


FIGURE 10. PROPOSED UPGRADED ACCESS ARRANGEMENT ONTO TOWNSEND ROAD - OPTION 1

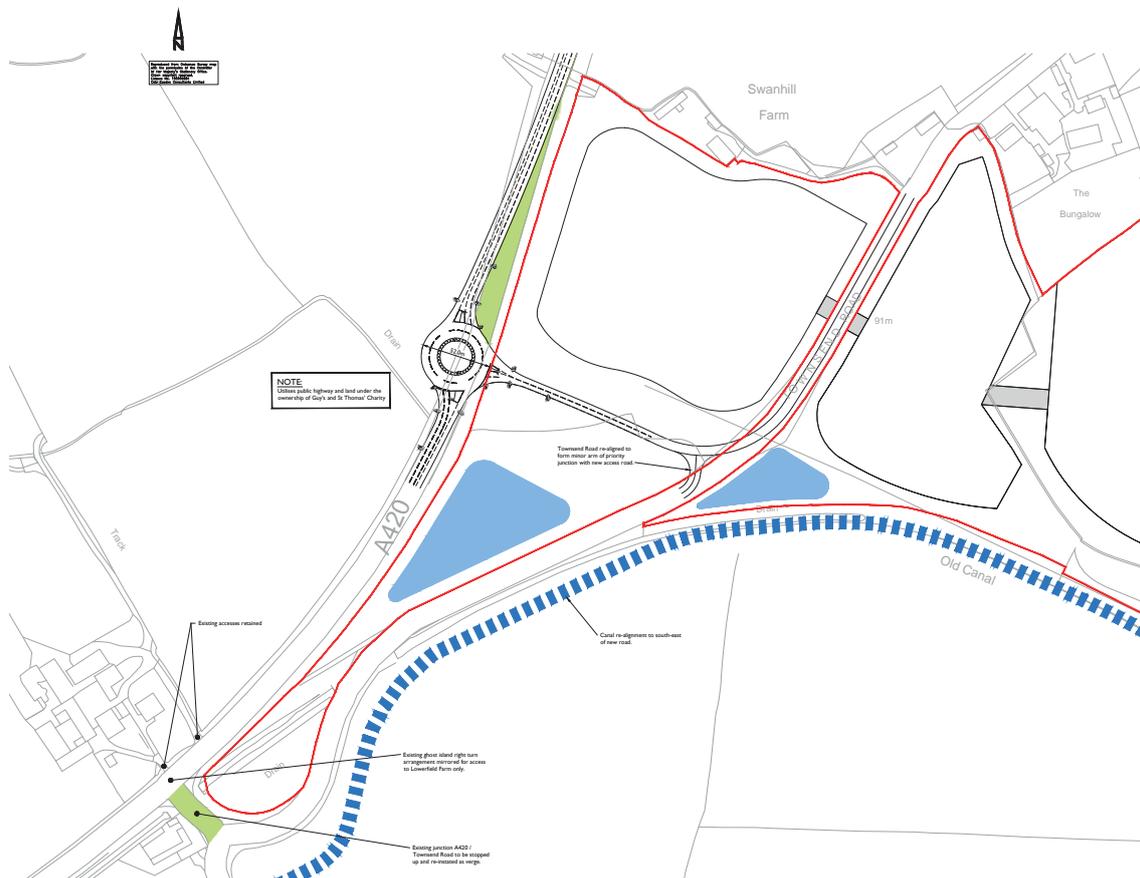


FIGURE 11. - NEW ACCESS ARRANGEMENT OFF A420 - OPTION 2

CONCLUSION

On behalf of our client, Guy's & St Thomas Charity, we submit this Vision Document to convey our initial proposals for our clients land south of Shrivenham.

The site offers the opportunity to create a linear park that makes a feature of the Wilts and Berks Canal by providing a naturalistic landscape and heritage asset that is easily accessible from the village centre, connects Townsend Road to the B400 Station Road, and increases the habitat potential of the local area while strengthening the character of both the Rolling Farmland and the Clay Vale Landscape Character Areas.

Vegetation within the linear landscape feature would interrupt any development views from the south from Bourton and would combine with the proposal to reinforce the sense of arrival into the settlement that is gained along both Townsend Road and B400 Station Road.

Within this document we have explained how the proposals align with local policy and how they conform to the emerging regional plan and indeed the issues which are being tackled, namely housing and economic need arising from the CaMKoX Arc.

In relation to the safeguarded land for the improvements to the Townsend Road/A420 junction, we note that our client owns the land around the safeguarded area and is therefore in a position to facilitate improvements in this location. In accordance with Core Policy 21, we have therefore had regard to this safeguarding when designing our proposals, as shown on the two options put forward by the transport consultants.

In relation to the Wilts and Berks Canal we further note that our client owns the land up to and beyond the canal route to the south of Shrivenham. Therefore our client is also in a position to facilitate improvements to the canal.

All plans within this document and within the accompanying transport statement have been prepared based on the most up-to-date information available, however they remain indicative and able to be modified if required. To this end, our client would welcome the opportunity to discuss this site in greater detail with all stakeholders associated with the Oxfordshire Plan 2050.

We note the clear and obvious need for homes in this location and the large task that this bestows on the Oxfordshire Plan 2050. We conclude that Shrivenham is a sustainable location to accommodate further growth and moreover, submit that our client's site is able to easily accommodate circa 700 dwellings. Accordingly we request its careful consideration for inclusion within the emerging plan, in order to be able to assist with the regional aspirations.

South
SHRIVENHAM

