

## Shrivenham Neighbourhood Development Plan

### Shrivenham Parish Council Response to Examiner's Questions in Clarification Note

#### **Policy DS1**

*What specific evidence exists to suggest that there is a real risk of coalescence between Shrivenham and Watchfield, Shrivenham and Bourton and Shrivenham and Longcot?*

**Response:** The settlements of Watchfield and Shrivenham extend up to the boundaries of the Golf Course which means that the golf course is the only space between Shrivenham and Watchfield. In 2016 planning applications were submitted by Linden Homes to develop the golf course. These were P16/V1268/FUL – to change the use of the Golf Course to a Country Park, along with P16/V2452/SCR – to demolish the clubhouse and erect 136 new dwellings. Both applications were withdrawn prior to determination. We are aware that the owners now have more modest plans for development. Since 2016 two further applications in this area have been granted: a) P17/V2785/O, to demolish the existing clubhouse and build a new one and b) P18/V2762/FUL – The Old Surgery, Northford Close. This application was to demolish the existing building and build a new dwelling. This was refused by the Vale but allowed on appeal. The latter application is mentioned because the land area juts out onto the golf course. It is felt that the threat of coalescence between Shrivenham and Watchfield, over the period of this plan and beyond, is still extant.

This is currently a speculative proposal for 700 dwellings which, if it goes ahead, will close the gap between Shrivenham and Bourton. It is accepted that there are no strategic sites allocated to Shrivenham in the Vale Local Plan Part 1 or Part 2, but speculative applications may still pose a threat should the Vale of White Horse area lose its Housing Land Supply. We are aware that the agents are in discussion with Oxfordshire County Council about the possibility of including this site in the Oxfordshire 2050 plan.

It is accepted that there is less of a risk of coalescence between Shrivenham and Longcot, certainly for the life of this plan. However, the Oxfordshire 2050 plan is currently being developed and it is not yet clear where that plan will site development.

*Is Policy DS1 primarily a landscape protection policy or a settlement gap policy? Its title would suggest the latter.*

**Response:** Policy DS1 is intended to be a Spatial Policy. One of the key requirements for development within the plan area is that growth conserves and enhances the setting of the rural setting of the village both physically and visually. Evidence gathered from the development of the NDP demonstrates that the village should remain discrete, separated from surrounding settlements by a clearly defined area of countryside. The information contained in the Landscape Character Assessment (Appendix 4) outlines the positive attributes of these gaps. We accept that the title of this policy should be changed in order to reflect the key attributes as identified in the Landscape Character Assessment and would suggest a title of 'Preserving the Distinctiveness and Identity of Settlements'.

#### **Policy H1**

*Does criterion 5 refer to the views identified in policy LC4 or is it more general in its approach?*

## Shrivenham Neighbourhood Development Plan

**Response:** Policy H1 refers to the views identified in Policy LC4. We will accept amendment of the policy in order to make this clear.

*I understand the intended purpose of criterion 7. However how would this approach work in practice? How would a developer understand the deliverability or otherwise of brownfield sites elsewhere in the neighbourhood area?*

**Response:** The intention of criterion 7 has always been to reflect national and local planning policy in respect of brownfield developments. This is consistent with plan objectives SH1 and SH3.

We would expect applications for development on Greenfield sites to demonstrate the benefits of the application, and to show how they would mitigate the loss of greenfield. As part of their background research, we would expect applications to consider other sites within the Plan's area and understand what is happening there. We will accept amendments to this policy which clarifies our intention.

### **Policy H3**

*Are 'important gaps' identified anywhere in the Plan?*

**Response:** 'Important gaps' are not defined within the plan. We would find it acceptable if this text was removed such that the first paragraph reads 'New buildings or extensions will be supported where the proposals do not dominate neighbouring buildings, impede local views or adversely affect the significance or special interest of heritage assets'.

*I am minded to reposition the second sentence of the submitted policy into the supporting text and to include reference to Design Guide in retained first part of policy. Does the Parish Council have any comments on this proposition?*

**Response:** We agree with the proposed change.

### **Policies D1a/D1b**

*Am I correct to conclude that the former policy applies specifically to new dwellings in the village and that the latter is a more general policy?*

**Response:** Yes, that is correct. We would be happy for this to be amended as such.

### **Policy D1a**

*I can see the close association between the policy and local/national policies. However, is there an inherent tension between v. and vi?*

**Response:** We can see that there is tension between v and vi in this policy. We would be happy if you were minded to rearrange and reword these sections. We would suggest that vi becomes v and is reworded such that it states that 'new buildings shall be 2 storeys high and a pitched roof is preferred'. We suggest the current v is reworded such that there is an acceptance of outstanding or innovative design in smaller developments (i.e. 1-5 units), and in extensions and alterations. We wish to show that the general preference is for a traditional design, but that outstanding or innovative will be considered. We wish to avoid large developments of non-traditional design.

## Shrivenham Neighbourhood Development Plan

### **Policy D2**

*The policy suggests that opportunities exist for the development of buildings in the High Street. However, paragraph 4.3.5 comments that most development will be extensions and alterations. Which is the correct approach? From my observations of the High Street paragraph 4.3.5 more appropriately summarises the opportunities that exist.*

**Response:** We agree that there are limited new development opportunities in the High Street, although it is possible that some retail units could be considered for redevelopment in the future. We therefore suggest that Policy D2 be amended to read ‘The development of buildings including extensions and alterations, in the High Street, which is a designated conservation area, will be supported.....etc’.

*In any event should the policy make reference to the designated conservation area?*

**Response:** We agree. We have suggested a change in the above response, but welcome any further proposals you may have.

### **Policies P1a/b**

*In effect the two policies appear to be addressing the same issue. Could they be combined?*

**Response:** We agree that Policies P1a and P1b could be combined.

*Does the Parish Council have any specific evidence for the imposition of the higher parking standards in Table 8 beyond that incorporated in the supporting text?*

**Response:** Questionnaire results, feedback from consultations and anecdotal evidence has identified that new developments have a lack of visitor parking, leading to congestion on these streets.

*Are parking issues confined to specific parts of the village?*

**Response:** The parking issues are generally found in the High Street and on new developments, although they become more widespread when there are events taking place in the village.

*In any event would the higher standards proposed in Table 8 prevent the issues identified in the support text taking place in the future?*

**Response:** The intention of the policy P1b is to ensure that new developments provide adequate parking spaces for the modern family, and to cater for their visitors. We believe that these higher standards would prevent the issues being currently experienced in the speculative developments, for example the Roman Way and West End Road areas, where visitors are forced to park on pavements in order to avoid blocking the roads. It is accepted that the higher standards proposed for parking spaces will not prevent issues in the older parts of the village, but we believe that they will prevent the issues from worsening.

### **Policy EE2**

*Did the plan-making process identify specific support for particular type of businesses?*

## Shrivenham Neighbourhood Development Plan

**Response:** No it did not.

*Is there any reason why the policy refers only to 'new businesses'?*

*Could diversification arise from alterations/extensions/adaptations of existing businesses? Would such developments also be supported?*

**Response:** The policy should refer to all/any business. We would, therefore, support a change which removes the work 'new' from this policy.

### **Policy LC3a**

*Most of the policy is supporting text. Does the final part add anything to Part 1 of the Local Plan?*

**Response:** We agree that some of this policy is supporting text. However we believe that the sentence about rural distinctiveness reinforces Policy CP37 in the Vale Local Plan. We would be open to the rewording of the policy and an example might be 'The strong rural character, the setting and feeling of separation, and the tranquil and secluded settings of LCA1, LCA2, LCA3, LCA5 and LCA13 shall be conserved and enhanced.' The intention of this policy is to protect the character of these landscape areas and to reinforce the requirement that growth maintains the discrete, rural identity of the village.

### **Policy LC3b**

*Please could the Parish Council provide clarity on the remit of this policy? In particular what is meant by 'outside the built-up area of Listed Buildings'?*

**Response:** There are a number of listed buildings, mostly farmhouses which are outside the main built area of the village. This policy seeks to conserve or enhance their settings. We would be open to the rewording of the policy and one solution might be 'In accordance with Core Policy 39 of the VWHDC Local Plan Part 1, proposals shall conserve or enhance the rural setting of listed buildings which are within the wider landscape and outside the built area of the village. This will include the views across the landscape to them, both from the village and from the wider area.'

### **Policies LC4a-c**

*The various elements of the policy read in a negative fashion. Would the policy work if it took a more positive that supported development that would safeguard/respect/enhance the identified views?*

*Is there any specific reason why Policy LC4c makes reference to tall structures when the other two components of the policy are more general in their format and effect?*

**Response:** The word tall was included in policy LC4c because it was felt that taller buildings are more intrusive on the wider landscape views. However, we suggest the following rewording of these policies.

Policy LC4a Historic Views - 'The Village Character Assessment (VCA 5.2.7) identifies a number of valuable historic views which development proposals should conserve and enhance.'

## Shrivenham Neighbourhood Development Plan

Policy LC4b Valued views and vistas within the village – ‘The views listed in table 9 below have been identified as important to the village by residents. Development proposals shall conserve and enhance these views.’

Policy LC4c Panoramic views in the surrounding landscape – ‘The Landscape Character Assessment has identified a number of panoramic views from the landscape surrounding the built area of the village. These are an important part of the landscape setting of the village. In accordance with the VWHDC Local Plan part 1, Core Policy 44, development proposals should safeguard and respect these wide ranging views.’

### **Policy LC5**

*Please could the Parish Council comment on two other matters included in the NPPF (paragraph 99):*

- *the extent to which they are consistent with the local planning of sustainable development; and*
- *the extent to which each proposed local green space would be capable of enduring beyond the end of the Plan period.*

*The final paragraph of the policy goes well beyond the matter of fact approach included in the NPPF on this matter. I am minded to recommend a modification on this matter which would reposition the suggested exceptional circumstances into the supporting text.*

*Does the Parish Council have any comments on this proposition?*

**Response:** We feel that each of the local green spaces is consistent with local planning of sustainable development in accordance with NPPF paragraphs 96,97,99,100 and 101, and the VWHDC Local Plan part 1 policies CP45 and CP46. Each space is special to the community for the reasons given in the Green Spaces Assessment (Appendix 24). All of these spaces have endured for a significant length of time, the youngest being at least 40 years and the oldest being almost 100 years old. The allotment gardens are owned by the Parish Council and we understand that it will require an act of parliament to remove them. Coppidthorne Meadow and Pump Island are owned by the Parish Council and used as community amenities. The Recreation Ground and ‘Garage’ Island are owned by the Viscountess Barrington’s Trust; the Trust has articles which require the land to be maintained as such. The Parish Council is Sole Managing Trustee of the Viscountess Barrington’s Trust. The Wilts and Berks Canal Pathway and the Pocket Park are owned by the Wilts and Berks Canal Trust whose remit is to preserve and re-open the canal network. The corner of Youghal Close and Berens Road has no recorded owner. The land has been used by residents for approximately 40 years as public open space. There have been no attempts to curtail this activity and none is anticipated. There is no planning history.

On this basis, we are confident that each space is capable of enduring well beyond the end of the plan period. These spaces contribute toward the social wellbeing of the community and therefore support the social element of Sustainable Development.

We accept that the final paragraph of the policy could be moved to supporting text. To date there is no planning history associated with these spaces.

## Shrivenham Neighbourhood Development Plan

### **Policy HE2c**

*I am minded to recommend that it becomes a Community Aspiration. Does the Parish Council have any comments on this proposition?*

**Response:** We accept your recommendation.

### **Policy PROW1**

*The final part of the policy reads as a Community Aspiration. I am intending to recommend accordingly. Does the Parish Council have any comments on this proposition?*

**Response:** We accept your recommendation.

### **Policy CSH1b**

*I am minded to recommend that it becomes a Community Aspiration. Does the Parish Council have any comments on this proposition?*

**Response:** We understand that Community Aspirations are intended for non-land use planning matters; we believe that this policy is a land use policy. We see no reason why it cannot operate effectively to ensure that sustainable development (i.e. meeting the social, environmental and economic needs of the community) at the time and in the place required. We believe that the policy is capable of being delivered using planning conditions.

The intention of the policy is to try and mitigate the impact of development on existing residents during the build phase. Of the new developments currently taking place in the village, only the Strategic site has been mindful of the impact on existing residents. However, this development has shown mitigation is possible. We would accept changes to the wording of this policy to meet the stated intention.

### **Policy CSH3**

*I am minded to recommend that it becomes a Community Aspiration. Does the Parish Council have any comments on this proposition?*

**Response:** We understand that Community Aspirations are intended for non-land use planning matters; we believe that this policy is a land use policy. We see no reason why it cannot operate effectively to ensure that sustainable development (i.e. meeting the social, environmental and economic needs of the community) at the time and in the place required. We believe that the policy is capable of being delivered using planning conditions.

The intention of the policy is to try and mitigate the impact of development on existing residents during the build phase. Of the new developments currently taking place in the village, only the Strategic site has been mindful of the impact on existing residents. However, this development has shown mitigation is possible. We would accept changes to the wording of this policy to meet the stated intention.

### **Policy CSH4**

## Shrivenham Neighbourhood Development Plan

*Is there anything local that would be suitable to be incorporated as a Community Aspiration?*

**Response:** There is nothing local that would be suitable. We suggest that this policy is removed to supporting text or to a Community Aspiration.

### **General comments**

*Several policies are either a repetition of local policies or include elements of local policies. Was this a deliberate approach?*

**Response:** This was a deliberate approach. We seek to reinforce national and development plan policies at a local level.

*In this context I would find it helpful to receive the Parish Council's comments on the detailed suggested changes to certain policies in the representation from the District Council.*

**Response:** Some of the suggested changes are covered in our responses to the Examiner, given above. Where clarification is sought, we would, in general, agree to changes which provide that. Our comments to the detailed suggested changes suggested by VHWDC follow:

1. Comment 1 - Refer to NPPF 2019 – we agree
2. Comment 4 – Criteria 2 and 3 – we disagree with the suggestion that ‘have regard’ should be used, since we believe it is not in agreement with the views of the community. The intention of these criteria are to ensure that development within retains the village setting as a discrete settlement surrounded by a rural landscape.
3. Comment 4 – Criterion 5 – we agree that clarification should be given on the views intended to be included, but we disagree with the addition of ‘significant’ since we believe it is not in agreement with the views of the community. The intention of this criterion is to ensure that development within retains the village setting as a discrete settlement surrounded by a rural landscape. A suggested rewording might be: ‘Cause no harm to, or loss of significant views, both within the conservation area and of the surrounding landscape’.
4. Comment 7 – Amendment to policy H4. We disagree with this change since we believe it is not in agreement with the views of the community which sought a higher level of affordable housing being offered to those with a local connection. However, we accept that there is an inconsistency between the policy and paragraph 4.2.13 in the supporting text. We would be open to an amendment to policy H4 which would provide for a target allocation of 50% of affordable housing being offered to those with a local connection. If this amendment were to be made we would accept the removal of paragraph 4.2.13.
5. Comment 12 – Change policy title – we agree.
6. Comment 14 – We accept the statement that the guidance referenced is not a development plan document. Therefore, even though this change is not in agreement with the views of the community we agree to the suggestion.
7. Comment 18 – Local Green Space designation – We feel that criteria c is explained in the LGS assessment document (Appendix 24). However, for clarity, the size of the areas concerned are:
  - a. Recreation ground – 4 hectares

## Shrivenham Neighbourhood Development Plan

- b. Pump Island – 0.25 hectares
  - c. Youghal Close/Berens Road – 0.33 hectares
  - d. Coppidthorne Meadow – 2 hectares
  - e. Pocket park – 1.75 hectares
  - f. 'Garage' Island – 0.25 hectares
  - g. Allotment Gardens – 1.75 hectares
8. Comment 22 – We agree to the suggested change.
9. Comment 23 – We agree to the suggested change.
10. Comment 24 – We agree to the suggested change.

### **Representations**

*Does the Parish Council wish to comment on any of the representations made to the Plan?*

*In particular does it wish to comment on the various representations from the development industry and the District Council on Policy DS1 (Settlement Gap)?*

**Response:** We wish to make the following comments:

1. Comments made by Paul Butt
  - a. we agree that there may be inaccuracies on the maps and we are open to you suggesting amendments to correct them.
  - b. We disagree that a *view across the plan area from outside the plan area* should be excluded. We seek to emphasise the rural setting of the village.
  - c. We do not wish to remove the map demonstrating the settlement gap. We feel it is important to show the setting of the village in the wider landscape.
2. Comments made by Gladman
  - a. Where there are factual inaccuracies we agree to allow you to correct them.
  - b. We disagree with comment 4.2.4. Figure 4.1 clearly shows all three settlement gap areas to be within the plan area.
  - c. In general, we disagree with comments which require the deletion of policies or the removal of significant parts of policies. We argue that our Health Check, carried out by an NPIERS examiner did not raise such issues.
  - d. Gladman has consistently requested that the plan become an allocating plan. We strongly disagree and wish the SNDP to remain non-allocating. Shrivenham has accepted significant development since 2016 such that the village has almost doubled in size; one strategic site is within the VWHDC Local Plan part 1, the remaining sites are the result of speculative developments allowed on appeal. There are no allocations for Shrivenham within the VWHDC local plan part 2.
  - e. We disagree that the SNDP does not meet basic conditions. We argue that our Health Check, carried out by an NPIERS examiner did not raise such issues.
3. Comments made by Michael East
  - a. Where there are factual inaccuracies we agree to allow you to correct them.
  - b. While we accept the comments made about CA4a and b, we do not feel that the SNDP is the place to address them in detail.

## Shrivenham Neighbourhood Development Plan

- c. We do not agree with the proposal to remove older village surveys. We feel that they present a useful context to the plan. The Village Survey 2014 was part of the CLP process and the Village Fete Survey 2015 was part of the SNDP development.
- 4. Comments made by Barton Willmore
  - a. We wish it to be noted that the 'long term housing needs' referred to in this response relate to the Oxfordshire 2050 plan, which is still under development.
  - b. We believe that our plan is consistent with regional and national policy. We argue that our Health Check, carried out by an NPIERS examiner did not suggest it was inconsistent.
  - c. We seek clarification from the examiner regarding the points raised by Barton Willmore on policy DS1. Again, our Health Check, carried out by an NPIERS examiner did not suggest that this policy should be removed.