

Vale of White Horse Planning comments published – Reg 16 Consultation

East Hanney Response

The response is provided below to each of the comments received.

Comments

1.	General Comment	There are a number of references to the 'Vale of White Horse Design Guide' throughout the NDP. We recommend these are updated to the 'Joint Design Guide (2022)' for precision, as Vale of White Horse and South Oxfordshire District Councils adopted a Joint Design Guide in 2022.
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EHPC response:

Agree this proposed amendment.

2.	Page 26 Policy EHNP 1 – Village Character, Sustainable Development and Design.	<p>To provide the clarity required by national guidance, we recommend the following addition, so the reader understands what the key views are:</p> <p>v) They preserve or where practical enhance, the openness of East Hanney including key views in and out of the village (as set out in Appendix I).</p> <p>As highlighted in our Regulation 14 comments, we recommend that criterion vi is set out as follows, to provide the clarity required in national guidance, specifically in relation to Paragraph 57 of the NPPF and the relevant tests seeking contributions from developers (Regulation 122 of the Community Infrastructure Levy (CIL) Regulations):</p> <p>vi) Where appropriate provide in all new developments of 10 or more units accessible greenspace in all new developments with an appropriate stewardship funding mechanism including capital spend on amenities.</p>
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EHPC response:

- Additional para v) is a welcomed amendment which is agreed.
- Proposed amendments to vi).
 - First part. Deletion of the words 'in all new developments of 10 or more units' is a good amendment which is agreed.
 - Second part. Deletion of the words 'with an appropriate stewardship funding mechanism including capital spend on amenities' is accepted.

Noting that the related policy wording (which this effectively duplicates) within policy EHNP14 is retained.

The wording within EHNP 14 relating to provision of green space in new developments is an important plank of the plan, with stewardship being passed to the Parish Council necessary to avoid contractor failures to maintain. Contractor failures are ongoing issues, examples are set out in the Plan and have resulted in numerous enforcement events needing to be reported to and actioned by the District enforcement team. This also has impact on resident’s experience of living in East Hanney. It is therefore important that if the words as recommended by the District are to be deleted from EHNP1, then the related drafting within EHNP14 for stewardship by the Parish or such suitable body to ensure the good management of the village green spaces under policy EHNP14: Green Spaces for Play, is retained.

3.	Page 33 - Policy EHNP 3 - Infill	<p>As highlighted in our Regulation 14 comments, Neighbourhood Plans in villages of comparable size have used the following definition of infill development:</p> <p><i>The filling of a small gap in an otherwise continuous built-up frontage or on other sites within the settlement where the site is closely surrounded by buildings.</i></p> <p>We continue to recommend this wording is used, for clarity and precision, as infill does not necessarily and solely relate to housing development.</p> <p>Infill development is defined as the filling of a small gap by way of construction of dwellings in an otherwise built-up frontage or on other sites within the settlement where the site is closely surrounded by buildings, including on and within the gardens of established properties, or on areas of back land.</p>
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EHPC Response:

We are comfortable with the amendment of definition but would request that the following words be retained in the policy wording ‘including on and within the gardens of established properties, or on areas of back land.’

Reason being, that East Hanney is not an urban space and there will not always be a built-up frontage, the more common case of infill will be of gardens and back land which would have impact on character. It is important that the words within the last sentence are retained because without them the policy simply relates to the filing of a gap in a built-up frontage which in most cases would have minimal effect, compared to the infill of gardens and back lands within a rural context such as in East Hanney, which could have significant impact on the character of an area.

4.	Page 39 Policy EHNP4 - Coalescence	<p>As we highlighted in our Regulation 14 comments, NPPF paragraph 16 states that 'plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area'. As the first sentence of this policy largely repeats Development Policy 29: Settlement Character and Gaps of Local Plan 2031 Part 2, we recommend it is deleted and the policy amended as follows, for clarity:</p> <ul style="list-style-type: none"> • Development proposals in the neighbourhood area should demonstrate that the character of any particular settlement is retained, and that a physical and visual separation is maintained between its different settlements. In particular, nNew development should maintain the physical and visual separation between the following settlements within the neighbourhood area: <ul style="list-style-type: none"> • between East Hanney and West Hanney (insofar as this affects the neighbourhood area); • between East Hanney and Grove (insofar as this affects the neighbourhood area);
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EHPC Response:

Agree this proposed amendment.

5.	Page 36 – reference to West Hanney NDP	<p>As highlighted in our Regulation 14 comments, we recommend figure 9 is amended to accurately reflect the gap designated within the West Hanney NDP, for clarity (perhaps using a hatched outline as utilised in the adopted West Hanney NDP, page 18).</p>
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EHPC Response:

We are a little unclear as to which map/figure is suggested for amendment. Figure 9 within the Plan is a photographic aerial view with the Parish border indicated (by a blue line) the image being provided to illustrate the area of the Gap. It would be possible to provide a hatched outline to this figure but that would be different to the form illustrated in the West Hanney NDP which is a map. We do not think that this is the figure for which amendment is proposed.

A map of the area showing the Gap is provided in figure 10 (page 37) which is intended as a policy map to show the Gap designation. The figure reference (below the map) can be amended to state this.

Figure 10 was enhanced following the recommendations at Reg 14. It utilises different colouring to indicate different parts of the Gap, as well as the Parish border and in so doing has the benefit of providing context. We agree that it could be enhanced further to make the outline of the area of the Gap more definitive, and for a key to be added, if that is what is recommended.

Figure 10 is shown below for comparison with the map referred to within the West Hanney NDP. Within Figure 10 the area of the Gap in East Hanney is indicated and the designated area outlined. A

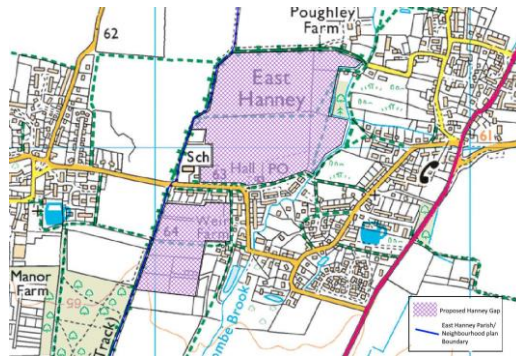
benefit of the map as presented is that it also serves to show the narrowest point of the Gap which is within West Hanney (shaded separately) as well as giving context.

We consider that the East Hanney map (figure 10) accurately reflects the area of the Gap for designation which lies in East Hanney, but as noted above could benefit from a more definitive outline and/or provision of a key.

Comment 7 (below) also appears to relate to figure 10, and requests provision of a key.

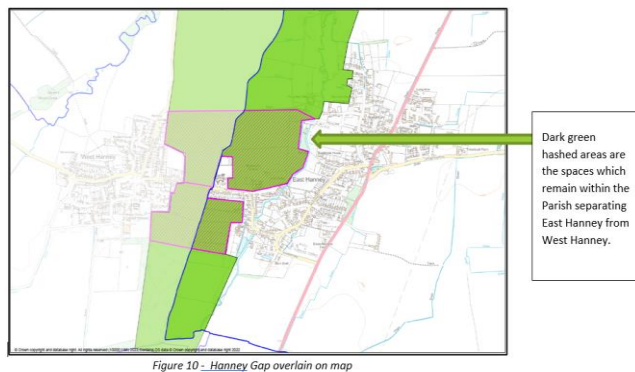
Summary: We assume that figure 9 which is an aerial photograph is not to be amended. We propose amendment to figure 10, to both the title and the content to better define the designated area and give precision. Figure 10 also to be enhanced by provision of a key. We would prefer to keep the base map on which the form is laid and therefore suggest retention of the base map.

Alternatively, if recommended we will amend figure 10 so that just the designated area is highlighted on the same basis as in the West Hanney NDP, thus just the designated area is shown. We would wish to retain the same base map as used. The following is a draft version, which is provided for to give an indication of what that map would appear as, and for comparison to the existing map (below). It is only a draft and would have a key and outline added.

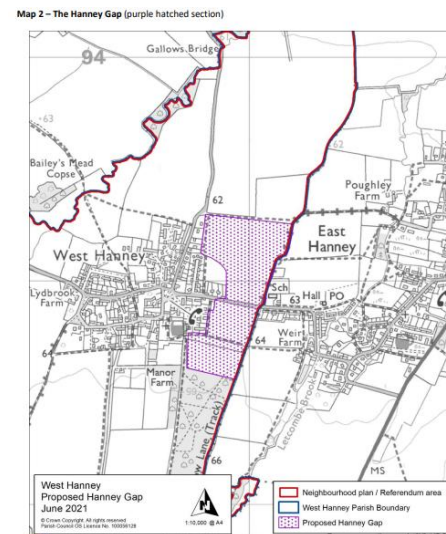


For reference, the 2 maps below are as currently provided in the different NPD's.

East Hanney Map of the Hanney Gap



West Hanney Map of the Hanney Gap



6.	Page 45 - Policy EHNP6 – Retention of trees and hedgerows	<p>We recommend the following amendments, to ensure the clarity required by national guidance, as not all applications will require arboricultural assessments, for example:</p> <p>ii) Development proposals (where appropriate) must include Arboricultural Impact Assessments and Arboricultural Method statements seeking to retain mature or otherwise important trees, groups of trees, woodland and hedgerows on site. Where loss of any such features are proposed these must be accompanied by a robust argument as to why the scheme design/layout concept cannot accommodate such features.</p> <p>iii) In addition, development proposals (where appropriate) must mitigate loss of features by undertaking a review as follows:</p>
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EHPC Response:

Agree this proposed amendment.

7.	Page 46 – Figure 10	<p>As highlighted in our Regulation 14 comments, the labelling of Figure 10 is unclear. To ensure precision, we recommend including a key to clearly set out the purpose</p>
		<p>of the red, blue and light green sections, not just the dark green.</p>

EHPC Response:

We are unclear as to which map is being referenced for page 46 but believe the map to be that at figure 10. Figure 10 being part of Policy EHNP4 and is on page 37.

We can provide a key.

Please also see response to comment 5, above.

8.	Page 51-2 Policy EHNP 7 – Letcombe Brook	<p>This policy, in terms of buffer, goes well above and beyond Policy 30: Watercourses in Local Plan Part 2 and the 20m blanket buffer, conflicting with this policy, is not backed by sufficient technical evidence to support it. Many of the requirements of the policy would not be appropriate/required for a variety of development proposals (for example, a flood risk assessment is only required for certain development proposals, as confirmed in the Validation Checklist). Therefore, to ensure general conformity with the strategic policies contained in the development plan, we recommend that this element is removed and additionally recommend the following amendments:</p> <p>Proposals for development should ensure that regard is given to the highly sensitive nature of the Brook through East Hanney both ecologically and in respect of flood risk, and the need for its conservation by not allowing any new operational development within 20 meters of the Letcombe Brook. As appropriate to their nature and scale, development proposals should be at least 20m 10m from the bank of the Letcombe Brook, unless exceptional circumstances can be fully demonstrated in which case a minimum of 10m must apply, and all proposals should: (...)</p> <p>IV. Include flood risk assessment and (where appropriate) flood mitigation proposals which may include the provision of new habitat features, such as ponds.</p> <p>VII. New development proposals adjacent to or encompassing Letcombe Brook outside of the 20-meter buffer are encouraged as appropriate to their nature and scale, to:</p> <ul style="list-style-type: none"> • Create new habitat features such as ponds, and scrapes in the Letcombe Brook corridor. • Include a long -term landscape and ecological management plan for their proposals and a minimum 20 10 meter buffer zone, favourable to the enhancement of biodiversity, along both sides of the water course.
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		<p>VIII. For the future, the whole length of the Letcombe Brook as it passes through the Parish is encouraged to be considered, recognised and treated as a sensitive ecological area and natural habitat. The footpaths along its bank and through associated Local Green Spaces are to should be maintained using natural materials. The qualities of tranquillity, openness, and green natural landscape which the Brook provides to should be protected and where possible enhanced.</p>
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EHPC Response:

A separate clarification relating to this policy has been provided as part of the Examination clarifications.

We request that the certain of the deletions as set out below suggested by the District are not applied particularly those that relate to the buffer as they have the effect of removing the

protections which we are seeking for the rare and sensitive biodiverse environment that exists in East Hanney along the course of the chalk stream. We contend that this policy as drafted but inclusive of the other proposed amendments (as set out below) will provide the appropriate protection through policy as is needed for the stream as it passes through East Hanney, which is in line with and complimentary to the intent of the District for the protection of chalk streams as set out within the supporting text of the District development plan (Local Plan 2031 Part 2 Page 113).

The suggested amendments to the buffer if applied would effectively reduce the planning policy protections for the rare chalk stream. This is in our view contrary to the intent set out within the Local Plan document where the supporting text identifies the importance of the Letcombe Brook as a rare chalk stream and its biodiversity.

Aspects of the biodiversity, particularly the flora and fauna, attracted to chalk streams and evident in East Hanney include rare and protected species such as the water vole (the UK's fastest declining mammal) and otter. The application of the buffer proposed within EHNP7 within the Reg 16 drafting provides this essential protection for the stream and its biodiversity and the natural environment along its course within the Parish. Reasons for this requirement are provided within the Plan and supported by additional evidential material as submitted in response to the Examination clarification question.

We considered that the drafting provided through the Reg 16 consultation process had addressed the requirements and incorporated amendments that we thought were cognisant of the changes proposed by the District within its last response. Particularly the policy words which the District now proposes for deletion 'by not allowing any new operational development within 20 meters of the Letcombe Brook' as we considered that this suggested drafting which was provided by the District on 14/10/22 as part of the dialogue, to be particularly helpful and a deliverable solution. The comments received in the dialogue being as follows:

- The amended policy seeks to double the minimum undevelopable buffer from 10 metres to 20 metres within the village, and up to 50 metres outside of the village. It is not clear whether the policy prohibits all development within the 20m buffer, or just that the plan itself "does not propose development" in the buffer. The wording of the policy seems to allow for unplanned development (e.g. windfall sites, householder development) within the buffer. The above matter could be tightened by changing restrictive wording to "...by not allowing any new operational development within 20 metres" (to account for changes of use) if the group feel strongly that they wish to retain this requirement.

The response also stated

- Our Ecology Officer explained that whilst they support the intention (protecting the Letcombe Brook), they consider the policy to be too restrictive without robust justification and inconsistency with DP30. Even ancient woodlands, identified as irreplaceable habitats, require a minimum 15 metre buffer under [Standing Advice](#). There is no requirement in the NPPF for this enlarged buffer and no evidence justifying this.

In order to be compliant with policy to protect irreplaceable habitats and give further weight to the case for the extension of the buffer, we would accept a reduced buffer of 15m.

We do consider that it is important and feel strongly about the need to retain this requirement (for an increase in the buffer through this policy).

With regard to each of the proposed amendments, our thoughts are as follows:

- First para: Please reinstate the words deleted commencing ‘by not allowing.....’

As above we would support an amendment from 20meters to 15 meters.

- With the reinstatement of the above, and if 15 meters is accepted, on the eighth line the proposed 10m, should be replaced with 15m.
- The deleted words proposed for deletion in the line commencing ‘demonstrated’ being ‘in which case, etc’ to be reinstated/not deleted.
- Amendment at iv) Accept deletion of ‘flood risk assessment and)
- Amendment at vii) Accept amendments save that 10m should be amended to 15m (if 15 meters is accepted).

Amendments at viii) Accept amendments.

9.	Page 57 Policy EHNP 8 – Local Green Spaces	As highlighted in our Regulation 14 comments, our landscape team queried whether many of the spaces listed could qualify as Local Green Spaces, relating to how many had no public access, including footpaths, through the areas - and also had little visibility to the village or were large areas of farmland. We recognise that the NDP’s proposed Local Green Spaces have been revised since; however we would continue to question whether LGS F (specifically its non-wooded areas) could be considered ‘demonstrably special to a local community and holds a particular local significance’ as set out in NPPF paragraph 102.
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EHPC Response:

If the recommendation is for the removal of site F, we would accept that recommendation.

10.	Page 59 to 61	We recommend that the ‘Technical Note’ is moved to Appendix D, for clarity and to ensure the NDP is concise, as highlighted in national guidance. It would be better placed in an Appendix, for reference.
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EHPC Response:

Agree this proposed amendment.

11.	Page 63 to 66 Policy EHNP9 – Nature Recovery Network and Biodiversity	<p>As this is a newly-inserted policy since the pre-submission consultation, we commend the research and thought behind it. We do recommend a number of amendments to the policy and supporting text/maps as follows:</p> <p>We recommend that Figure 17's Policy Map 'policy area' in grey and red is corrected to reflect Figure 16's draft Nature Recovery Network area, for precision and also for clarity, because it is not clear how the grey area currently highlighted in Figure 17 has been arrived at, in its extension of the draft NRN core and recovery areas. We also recommend, for precision, that the area circled in red is re-drawn, as our Ecology Officer highlighted that there appears to be an error in the core area markings here when compared to the original maps (also shown in East Hanney's Appendix A, page 33).</p>
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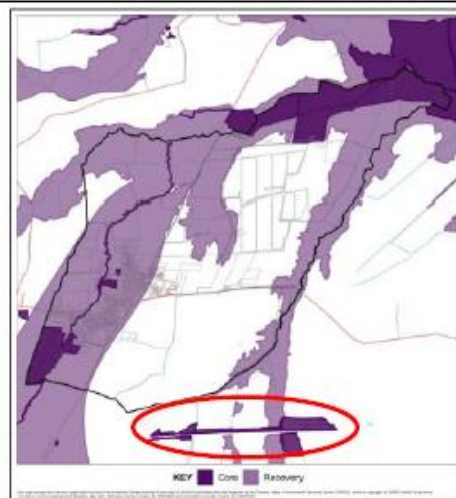


Figure 16: Extent of the Draft Nature Recovery Network within the Parish
Source Oxfordshire Treesopes Project Report for East Hanney May 2022.

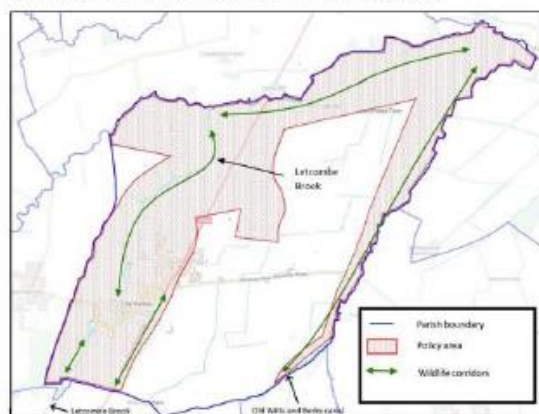


Figure 17 : Policy Map - Designated area Policy EHNP9

On Page 63, for clarity, we recommend the addition of an asterisk or footnote, to confirm the following detail:

Large parts of the Parish have been recognised for Nature Recovery and lay within the Draft Oxfordshire Nature Recovery Network 'NRN*', thus identified as Recovery Zone.

		<p>*The draft NRN was created as part of the evidence base for the Oxfordshire Plan 2050 which has now ended. NRNs are a major commitment in the government's 25 Year Environment Plan and are enacted by the Environment Act 2021.</p> <p>We recommend the following policy changes, to clarify that the draft NRN is not a constraint to development. We recommend part of criterion iii is removed, (as it does not provide a distinct local approach and largely refers to the NPPF) and that the remainder of iii and iv are combined, for clarity and consistency of application, regarding biodiversity aims.</p> <p>This policy will require:</p> <p>i Development proposals that lie within or adjoining the Network to should have full regard to maintaining and improving the functionality of the Network in the design of their layouts and landscaping schemes. Proposals that will harm the functionality or connectivity of the Network will not be supported.</p> <p>ii Development proposals that will lead to extension of the Network, including The delivery of allotments and orchards and enhancing hedgerows for the use of the village are encouraged; and schemes seeking to enhance the biodiversity of the parish will be supported. , will be supported provided they are consistent with all other relevant policies of the development plan.</p> <p>iii All proposals should seek to achieve a minimum of 10% net gain in biodiversity, having regard to the requirements of section 15 of the National Planning Policy Framework to be implemented within the site, or where this is evidenced as not possible, implement local delivery of this biodiversity compensation</p> <p>iv Any development proposals within the parish are required to deliver 10% biodiversity net gain, as per national legislation; and proposals within the identified Nature Recovery Network outside of the settlement within the countryside to the north of the village, are encouraged to should achieve a 20% net gain in biodiversity.</p>
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EHPC Response:

Taking each point from the top of the above table.

- Figure 17 Policy Map was produced to address comments received for a Policy map with focus on the Parish to compliment figure 16 (figure 16 otherwise illustrating the detail of the area of the NRN). We apologise if a more detailed/precise form was needed, the map as provided was intended to illustrate the scope of the area of the NRN across the Parish and show certain features. The detail of the area of the NRN is provided separately within figure 16.

The grey area within the map is intended to be the area of the NRN.

We have produced the map ourselves with limited mapping tools and did not seek to fully replicate the detail of the outline of the NRN area as shown in figure 16 (which does have a precise outline).

We recognise that a map identified as a policy map is required.

Thank you for highlighting the error in the core area markings of figure 16. The error within the map lies outside of the Parish. We propose to address this aspect by reframing figure 16 excluding the error, as this lies outside of the Parish boundary. Thus, we will seek to represent the same map with the Parish boundary commencing toward the lower part of the diagram, together with a supporting key shown below the main figure. This would remove the error and provide a precision map.

We will also look to provide a revised version of figure 17 and will seek as best as possible to replicate the detail.

Alternatively, a solution could be to also use the revised figure 16 as the policy map, if that would be acceptable?

- Recommendation for the addition of an asterisk or footnote to confirm the detail and the words as recommended.

Thank you for the recommendation which is helpful and will be added to the foot of the page as a footnote.

- Recommendation for changes in policy to clarify that the draft NRN is not a constraint to development, and to combine iii and iv.

The revised policy wording being as shown within the table save that the words 'at least' should be inserted between 'deliver ' and '10%', so that the amended text will read; ' Any development proposals within the parish are required to deliver at least 10% biodiversity net gain'. The reason for this is because 10% is a minimum.

We are comfortable with the proposed amendments save for the suggested words above. However, note that the word 'should' on the second line and on the last line of the amended text may be substituted subject to recommendation in response to the clarification raised by the Examiner.

Thank you for the above recommendations.

Summary:

- Map at figure 16 to be reframed and presented.
- Map at figure 17 to be refined for improved precision.
- Amendments to policy wording proposed are accepted, save for the addition of the words 'at least' as described above.

12.	Page 71 Policy EHNP 10 – Housing	We recommend amalgamation of the first and second paragraphs, so they are drafted with sufficient clarity for consistent application.
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	Density and open space	<p>The third paragraph of this policy is not related to density - but rather the provision of open space. We also therefore recommend adding 'and open space' to the policy title, for clarity.</p> <p>Appendix K of Local Plan 2031 Part 2 sets out the leisure and open space standards. The adopted standards require the equivalent of 15% of the residential area to be provided as public open space. We therefore recommend removal of the sentence relating to this, as it largely repeats the policy; and recommend amendment of the requirements of the last line – as the 25% requirement goes well above and beyond Local Plan Appendix K's requirements.</p> <p>The density of any new development should be in keeping and in accordance with reflective of the character of the local surrounding area. It must, respecting the rural nature of the parish and be designed to give an impression of spaciousness with uniform houses and plots being avoided.</p> <p>To respect the character of the village, developments which reflect the rural setting and low density of the village, will be acceptable.</p> <p>Where development is proposed at an edge of village location these must be at a lower density than in the core of the settlement reflecting the rural nature of an edge of village location. Such proposed development should also be at a density which is lower than that of the immediate surrounding area, enabling provision of a lower density of housing at the village edge.</p> <p>Developments should include as a minimum 15% public open space plus an area for play and allotments where applicable, save that there should be no less than This plan encourages 25% of the development sites to be made available for public open space where development is proposed at an edge of village location.</p>
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EHPC Response:

Considering each of the proposed amendments separately:

1) the recommended amendments to the policy commencing with the paragraph : 'The density of any new development.....

We accept the recommended change to this paragraph as proposed save that in the separate clarification response to the Examiner (relating to use of language such as 'should', the word should on the first line, is suggested to be amended to 'must'.

2) Whilst part of the words within the paragraph proposed for deletion starting 'To respect the character of the village' are provided for within the other proposed amendments (in the preceding paragraph), we are not comfortable with the complete deletion of the requirement referencing 'character' as this is about ensuring that the integrity of the character of the village is retained through sustainable development particularly from the design and density of a development. We would therefore suggest a new short paragraph be inserted after the para ending 'at the village edge'. As follows:

'Proposals to demonstrate that the requirements of the Design Guide and this policy are met to ensure the integrity of the character of the area.'

We would be grateful if this could be considered.

13.	Page 74 - Policy EHNP 11 – Housing Mix	As highlighted in our Regulation 14 comments, we recommended that point i) should be revised to make reference to the essentiality of meeting district wide need. Unless the housing development is a rural exception site (which 'seek to address the needs of the local community by accommodating households who are either current
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		<p>residents or have an existing family or employment connection' (NPPF 2021, page 71)), any development with an affordable housing requirement will meet the needs of anyone in the district. We therefore recommend the removal of 'having regard to the prevailing local community requirements':</p> <p>i. Proposals of ten or more dwellings should deliver 35% affordable housing provision with an appropriate mix of housing types and sizes, having regard to the prevailing local community requirements when meeting the district wide need.</p> <p>Regarding iii), we also highlighted in our Regulation 14 comments that developments on any site in the Vale of White Horse should 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. We continue to recommend that this section is revised.</p> <p>iii) Proposals should deliver housing types which meet the needs of the district neighbourhood area and are encouraged and should to reflect the prevailing local needs of the neighbourhood area. community requirements and the provisions set out in this NP such as the need for bungalows.</p>
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Proposed EHPC Response:

We accept the proposed amendments, noting that reference to 'encouraged to reflect' is suggested in the District's proposed amendments.

14.	Page 77 - Policy EHNP 12 - Housing for an Ageing Population	<p>We recommend the following typographical amendments to this policy, for precision:</p> <ul style="list-style-type: none"> <li data-bbox="520 483 1182 640">i. Development which provides a material portion of suitable accommodation for the elderly population and opportunities for downsizing will be supported, provided that the proposal complies with DC and EHNP policies. <li data-bbox="520 640 1182 853">ii. Developments will be encouraged that provide at least 15% of market housing that is suitable for an ageing population. These developments should have features that take into account the likely needs of ageing residents, such as being on a single level and provision of an accessible garden area.
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EHPC Response:

Agree this proposed amendment.

15.	Page 87 – Link to report	<p>We recommend adding an up-to-date link to the 'Fields in Trust' report (the current one is broken), to ensure precision and so that appropriate evidence is easily accessible.</p>
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EHPC Response:

We will endeavour to add an up-to-date link.

16.	Page 89 - Policy EHNP15 – Dark Night Skies and Light Pollution	<p>Because it is the Local Planning Authority that ultimately gives planning permission, we recommend the following amendment to this policy, for precision:</p> <p style="text-align: center;">Development proposals that conserve and enhance relative tranquillity, in relation to light pollution and dark night skies, and comply with other relevant policies will be permitted supported, provided...</p>
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EHPC Response:

Agree this proposed amendment.

17.	Page 94 - Policy EHNP 16 – Flood mitigation in New Housing schemes and climate change	<p>As highlighted in our Regulation 14 Response, we recommend clarifying the inclusion of flood zones 2 and 3 in this policy. All applications should have to demonstrate that they do not increase the risk of flooding from increased surface water runoff, regardless of the relationship with flood zones (as surface water flooding can occur anywhere).</p>
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EHPC Response:

Thank you for the recommendation. To meet this, we suggest that the drafting be amended as follows: delete '2 and 3' and insert the word 'all' between within and flood. So that the drafting reads 'within all flood zones'.

18.	Page 99 - Policy EHNP 17 – Sustainable Development and Environmental impact	<p>The first bullet point seeks to replicate the requirements of Development Policy 25 Noise-Sensitive Development of the Local Plan part 2 in a less comprehensive manner. Development Policy 25, requires noise-sensitive development in locations likely to be affected by existing sources of noise to provide an appropriate scheme of mitigation to ensure appropriate standards of amenity are achieved for future occupiers of the proposed development. Development Policy 25 also requires proposals for noise-sensitive development to be accompanied by an assessment of environmental noise and an appropriate scheme of mitigation measures. If mitigation cannot be provided to an appropriate standard with an acceptable design, the development proposal will not be permitted. We therefore recommend that bullet points 1 to 4 of policy EHNP 17 are deleted.</p> <p>We also recommend that the section of the policy dealing with biodiversity is amended and merged with policy EHNP9 to avoid unnecessary duplication and conflict – for example setting different requirements for biodiversity net gain within the neighbourhood plan.</p>
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EHPC Response:

We have undertaken to redraft this policy and the supporting text.

It is acknowledged that Development Policy 25 Local Plan Part 2 gives general provision for noise sensitive issues, also that there a separate Development Policy that addresses air quality. The purpose of this policy and drafting is not to replicate or repeat aspects of the relative Development Policy but to address specific issues relevant to an area within East Hanney. In that regard, we would wish to retain the second and third bullets within a redraft.

Note that aspects of this policy relating to the treatment of noise were adopted from another Neighbourhood Plan which is already made (Chilton) and therefore considered to be compatible with the Local Plan.

We have in earlier drafts positioned the biodiversity elements within another policy, but following guidance incorporated them within this policy which is intended to address issues relating to sustainable development, which includes impact on biodiversity.

We believe that this to be the appropriate place as the aspects subject of the policy relate to specific aspects of biodiversity within developments.

19.	Design Code	<p>The Design Guidance and Codes document has been usefully informed by the Character Assessment. We do however have some concerns relating to this document.</p> <p>The document often strays beyond design guidance and sometimes outside the scope of neighbourhood plans setting additional policy requirements instead of guiding how good design and beauty should be achieved having regard to the local context. This issue is particularly</p>
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		<p>noticeable in the general codes but also present (to a much lesser extent) in the area specific codes.</p> <p><i>Design codes should be simple, concise and specific and; rely on visual and numerical information rather than detailed policy wording.” We believe the East Hanney Design Guidance and Codes will require modifications to achieve this. The council would be happy to provide detailed comments on this matter should the examiner consider appropriate.</i></p>
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EHPC Response:

The Design Code was substantially updated following helpful discussions with the Neighbourhood Planning team at the District Council and their detailed feedback. The Neighbourhood Plan signposts the Design Code in many of its policies and the Design Code helps to translate policy with reference to both the general and specific area-based codes. As a result, EHPC is comfortable with the updated Design Code as provided for in Reg 16.

East Hanney’s Character Assessment is a key foundation of the Neighbourhood Plan which has therefore informed the preparation of the Design Code. Character has been assessed using the Oxford Toolkit and embraces many aspects that contribute to beauty and good design. Examples include the Letcombe Brook and its associated spaces and habitats since the village grew around it over many centuries. Inevitably this has increased the level of complexity over time and as a result eight character sub areas have been identified. We believe that distinctive and appropriate guidance has been applied to each sub area and character has been translated into simple, concise and specific codes, together with visual and numerical supporting guidance.

We believe it now works for the needs of East Hanney and gives a balance of direction, detail and openness relevant to each of the different areas through the village. It is important that it gives the appropriate balance of detail for certain aspects within the guidance for a historic and rural village to be able to retain character and respect future needs. The revised design code does this and has been developed to meet the needs of both the Parish and the intended users with clear construction and in a format which is easy to understand and be applied. The design guide as provided will we believe enable future development to be highly reflective of the characteristics, nature and design forms of the village. We consider the revised draft meets its intended objectives and is an appropriate tool to guide the design of future development within East Hanney.

7th September 2023