



## RESPONSE TO INITIAL COMMENTS OF THE INDEPENDENT EXAMINER



### Chalgrove Neighbourhood Development Plan



## **Chalgrove NDP / Parish Council response to the Examiner's initial comments on the submission version of the Chalgrove Neighbourhood Plan (CNDP)**

### **Point 3 -**

**Examiner Comment** - The neighbourhood plan proposes a single housing allocation for 200 dwellings, which the plan text states will be a 17% increase in housing in the village. I understand that this figure emerged from the June 2016 version of the emerging Local Plan. However, the current version of the draft Local Plan, in Table 5f, has the figure of 248 for Chalgrove, which it states is the figure equivalent to a 15% growth. Clearly there is a disparity between the two percentage figures. Can I be confident that 248 represents a 15% growth figure?

**Response** - It is our understanding that the allocation of 248 in the current version of the local plan is based on a 15% increase on the number of dwellings from the 2011 census plus the original allocation in the Core Strategy. The figure of around 17% increase quoted in the CNDP is based on the number of homes in the village.

### **Point 4 -**

**Examiner Comment** - Up until the recent South Oxfordshire District Council meeting held on 28th March 2018 this was not an issue, as there was not a housing target for the neighbourhood plan area, due to the inclusion of the Strategic Allocation of 3, 000 homes on Chalgrove Airfield. However, I need to understand what the impact of the District Council's decision, removing the strategic housing allocation at Chalgrove Airfield, has on the housing figure for the village of Chalgrove. If the housing target figure is 248, it appears that the neighbourhood plan ought to be identifying land for at least an additional 32 homes, unless the commitments have changed.

### **Response -**

In the emerging local plan the larger village allocation for Chalgrove, should the strategic site at the airfield go ahead, is 0. The CNDP considered what would or could happen should the strategic allocation not go ahead. Should this happen it would be consistent to expect Chalgrove to plan for at least 15% growth, in line with what is planned for larger villages in the emerging Local Plan. The published version of the emerging Local Plan identified that 16 dwellings were already committed bringing the target down to 232. The proposed allocation and existing commitments are expected to achieve 320 new homes which exceeds the target in the emerging local plan.

### **Point 5 -**

**Examiner Comment** - This brings me on to the next point. Policy H1 is an allocation for exactly 200 dwellings. However, I am aware that the planning permission that exists on the site, P17/S00941/O is for **up to** 200 dwellings. Dependant on the final mix of units it could be that the development of the site could deliver a lower number and still comply with the terms of the outline. It would be surprising that the final figure delivered exactly 200 houses, but it could not deliver more. In which case, how would the plan be delivering its required housing numbers

**Response** – We believe that sufficient flexibility has been built in within the plan to ensure the delivery of required housing numbers, Chalgrove currently has a commitment of over 320 homes, the proposed allocation on Land West of Marley Lane for up to 200 homes (granted permission under reference number P17/S00941/O), 120 homes on Land East of Chalgrove (granted planning permission under reference number P16/S4062/O) and 16 homes identified as existing commitments in the publication version of South Oxfordshire emerging Local Plan (see Table 5f on page 66). The total number of homes with planning approval exceeds the 15% level of growth proposed for larger villages in the emerging Local Plan

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### **Point 6 -**

**Examiner Comment** - The existence of the planning consent of the land does raise the question, in my mind, as to the need for this policy and I would welcome views as to whether it should still be an allocation of the plan rather than a commitment.

**Response** – We have spent considerable time and effort assessing sites within the neighbourhood area. We acknowledge that the site that emerged as the preferred option has been granted outline planning permission. However, in our view, the proposed allocation is still important to guide decisions on any reserved matters applications. Furthermore, there is no guarantee that the proposal will be implemented so there is still a role for the proposed neighbourhood plan policy.

### **Point 7 -**

**Examiner Comment** - This then leads me to consider if the plan ought to be now looking at delivering the higher number of 232 without the strategic allocation, which additional site/ sites should be included and on what basis should that choice be made and whether that site(s) should be the subject of public consultation. Also, would it require a change to the Sustainability Appraisal

**Response** - We believe that sufficient flexibility has been built in within the plan to ensure the delivery of required housing numbers. Chalgrove currently has a commitment of over 320 homes. The total number of homes with planning approval exceeds the 15% level of growth proposed for larger villages in the emerging Local Plan

### **Point 8 -**

**Examiner Comment** - Policy C1 defines the built-up area by way of a description of the boundaries. Would it not be clearer for landowners, and decision makers, who will be users of the plan in the future, to have the edge of the built-up area shown as a line on an Ordnance Survey included in the plan. Otherwise the policy is open to interpretation as to whether a site falls inside or outside the built-up area boundary. Would the Parish Council be able to provide a plan, if I requested it and would there be a need for any public consultation?

**Response** - The approach taken by the CNDP in Policy C1 is consistent with the district council's Core Strategy which supports infill development within settlements without drawing a settlement boundary. This approach allows applications to be considered flexibly and on their own merits. The definition of infill development, in paragraph 13.10 of the Core Strategy, has provided sufficient clarity to enable the making of consistent planning decisions. In our view, Policy C1 will complement and enhance this approach.

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### **Point 9 -**

**Examiner Comment** - Policy EMP9 of the emerging Local Plan states” “In addition to the strategic allocation at Chalgrove Airfield, at least 2.25 hectares of employment land will be delivered at Chalgrove. This will be delivered through the Neighbourhood Development Plan.....” The policy goes on to cover the position if the neighbourhood plan is not progressed. The Neighbourhood Plan has not allocated any employment land. I would ask the Parish Council to explain its reasoning why the neighbourhood plan has chosen not to allocate any employment land nor set criteria for considering applications for employment uses. I note that the objective of the policy refers to supporting development of existing business parks for small business and I be provided with the details of the development at Jennings Monument Business Park. Would it be appropriate for this to be added as an allocation and would it cover 2.25 ha? Finally, would the LPA comment on whether that allocation set out in Policy EMP 9 is still relevant in the context of the removal of the strategic allocation at Chalgrove Airfield.

**Response** - We have been advised by SODC that we do not need to deal with all aspects of the Local Plan and that there is no obligation for us to allocate the employment land identified in policy EMP9. We are aware of the intention to expand on existing business land and support the existing business parks. As we have not carried out an assessment of employment land in the NDP process, in our view, it would not be appropriate to include this as an allocation in the plan. SODC will allocate or allow suitable additional employment land.

### **Point 10 -**

**Examiner Comment** - I note that Appendix 2 identifies 22 Important Green Spaces on the map. What is the status of this designation and what policies are related to the areas shown green on this map?

**Response** - There is no designation and no direct policy for the Important Green Spaces identified in the plan. These green areas form an important part of the village character. The plan's intention is to highlight the local importance of these spaces, some of which are maintained by the Parish Council, and for them to be taken into account in avoiding development on them.

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### **Point 11 -**

**Examiner Comment** - Has the Parish Council and the LPA any views on the proposal for residential development at Chalgrove Farm submitted at the Regulation 16 stage on behalf of Vanderbilt Strategic. In particular, would there be any disagreement with their scoring of Chalgrove Farm?

**Response** - The CNDP considered all sites put forward for development in the call for sites. Each site was assessed against a defined set of criteria and preferred options identified. The revised proposal for Chalgrove Farm came in once a preferred option was being consulted on in the pre submission consultation. Despite the lateness of the proposal coming forward we have carefully considered the proposal and the information that was available to us. Our consideration is detailed in the SA Environment Report. .

With regard to comments in the regulation 16 on behalf of Vanderbilt Strategic, Chalgrove Parish Council continue to work closely with the Environment Agency to identify flood alleviation schemes in the Parish and beyond. The Environment Agency is currently considering a scheme that will be effective in reducing the likelihood of flooding to Chalgrove and Stadhampton.

With regard to the scoring in the regulation 16 response on behalf of Vanderbilt Strategic, the table used in the regulation 16 document is taken from the pre submission Sustainability Appraisal (SA).

Page 45 of the submission version of the CNDP SA report states that individual site assessments against sustainability objectives were originally undertaken in March 2016 and that a further assessment was carried out by the Steering Group in August 2017. This further assessment included the proposal put forward for an extension to site 4 (Chalgrove Farm) Table 6.6 of the SA was updated taking into account all information gained, analysis undertaken and feedback from the pre-submission documents.

This assessment took into account flood risk reports commissioned by the CNDP and the steering group's review of the sites against the site criteria together with reports submitted to SODC as part of their planning application by the developers of sites 1, 10 and 11 and site 7. The developers for Site 4 are at a much earlier stage; a Vision for the development of the site was provided to the CNDP and was considered in the site assessment.

Comparing their scoring with table 6.6 of the submission version of the SA we would comment as follows

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| <b>Sustainability Objective</b> |  | <b>Regulation 16 submission on behalf of Vanderbilt strategic for Chalgrove Farm</b> | <b>Table 6.6 of the CNDP SA submission document for Chalgrove Farm</b> | <b>Comments-</b>  |
|---------------------------------|--|--|--|---|
| 1                               | Ensure development provides the number, type and tenure of homes that the community needs                                      | +  | +  | Scores are the same   |
| 2                               | Identify suitable development sites for a minimum of 82 dwellings  | +  | +  | Scores are the same   |
| 3                               | Ensure that any new development does not cause or exacerbate road safety issues, including safe parking                        | Blank  | --   | No score assessed on the response on behalf of Vanderbilt strategic |
| 4                               | Ensure foot paths and cycle paths are provided and retained wherever possible  | Blank  | -  | No score assessed on the response on behalf of Vanderbilt strategic |
| 5                               | Ensure that any new development does not place people and property at risk of flooding or exacerbate existing flooding issues. | Blank  | -  | No score assessed on the response on behalf of Vanderbilt strategic |
| 6                               | Encourage the use of urban drainage systems  | Blank  | 0  | No score assessed on the response on behalf of Vanderbilt strategic |
| 7                               | Conserve and enhance the water environment   | Blank  | -  | No score assessed on the response on behalf of Vanderbilt strategic |

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| Sustainability Objective |  | Regulation 16 submission on behalf of Vanderbilt strategic for Chalgrove Farm | Table 6.6 of the CNDP SA submission document for Chalgrove Farm | Comments-   |
|--------------------------|--|---|---|---|
| 8                        | Avoid low density development  | Blank   | +   | No score assessed on the response on behalf of Vanderbilt strategic   |
| 9                        | Ensure developments are safe and integrate into the community  | +   | -   | There is no clarification of the suggested amendment within the Section 16 response. The vision statement provided by Vanderbilt strategic shows proposed footpaths which are along a narrow country road; part of the proposed footpath crosses private land. The alternative proposed footpath across the recreation ground is unpaved and liable to be muddy in bad weather. |
| 10                       | Ensure developments have access to local services  | Blank   | -   | No score assessed on the response on behalf of Vanderbilt strategic   |
| 11                       | To continue to provide and protect open spaces and sports and recreation facilities and provide additional facilities where possible                             | +   | 0   | There is no clarification of the suggested amendment within the Section 16 response en behalf of Vanderbilt Strategic.  |
| 12                       | Detailed developer drainage strategies to be produced and agreed in liaison with Thames Water; with infrastructure in place prior to development being occupied. | ++  | 0   | The CNDP SA score is neutral for all sites as all development will need to meet this objective, if this is changed for Chalgrove Farm it would need to be changed for all sites.  |
| 13                       | Ensure that new development is of a high quality design and reinforces local   | Blank   | 0   | No score assessed on the response on behalf of Vanderbilt strategic   |

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|---------------------------------|--|--|--|---|
| <b>Sustainability Objective</b> |  | <b>Regulation 16 submission on behalf of Vanderbilt strategic for Chalgrove Farm</b> | <b>Table 6.6 of the CNDP SA submission document for Chalgrove Farm</b> | <b>Comments-</b>  |
| 14                              | Encourage renewable energy technologies within new development wherever possible | Blank  | 0  | No score assessed on the response on behalf of Vanderbilt strategic   |
| 15                              | Conserve and Enhance biodiversity and encourage the provision of new habitats    | ++   | 0  | The section 16 response on behalf of Vanderbilt assesses this based on the proposed flood alleviation scheme contained in their vision document. The CNDP score takes into account the scheme the Environment Agency is considering to reduce flooding in Chalgrove and Stadhampton and the early stages of the developer's proposal. |
| 16                              | Conserve and enhance the heritage of Chalgrove                                   | Blank  | 0  | No score assessed on the response on behalf of Vanderbilt strategic   |