

# Responses from Statutory and Non-Statutory Consultees Consultation 3

# **Responses from Statutory and Non-Statutory Consultees CONSULTATION 3**

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#### SC1 RESIDENT COMMENT

Chairman NPSC 1 Old School Place Gorwell Watlington OX49 5QH SC /
RECEIVA

15th May 2017

Dear Mr Bell

#### Re: Draft Watlington Neighbourhood Development Plan – April 2017

I am writing to raise a couple of points in response to the latest version of the Watlington Neighbourhood Plan (WNP) – Consultation version 3.

I welcome the proposed inclusion of the desperately needed ring/relief road to the west of the village centre. I also welcome the proposed suggestions to secure the delivery of the new relief road. I would suggest that perhaps the individual proposed site allocations where the proposed road, traverses has as part of the planning consent occupation restrictions on the new housing to be lifted upon completion of the new relief road.

I also note that the final northern part of the relief road, crosses land within Pyrton Parish Council, which increases the risk of delivery.

In terms of the proposed design of the relief road, I support the improvement of landscaping measures where the proposed route is closest to existing residential areas.

My point is that I question whether the suggested 7.5t weight limit is sensible to apply to the purpose - built relief road. Clearly, it is sensible to continue to have and perhaps reduce the weight limit through the village centre upon completion of the relief road, but it would seem sensible to allow a larger weight limit on the proposed relief road and to ensure that the new relief road is of sufficient width to ensure/encourage larger commercial and agricultural vehicles users to drive on the relief road and not cut through the village centre.

In conclusion, I congratulate the WNP Steering Group on progressing the Neighbourhood plan. The production of the Neighbourhood Plan clearly involves a large amount of work and I would like to wish you all the best in progressing the Plan through the final stages.

Yours sincerely

#### SC2 PYRTON PARISH COUNCIL

#### PYRTON PARISH COUNCIL RESPONSE TO WATLINGTON NEIGHBOURHOOD PLAN CONSULTATION 3: 18 April - 29 May 2017

#### Introduction

- 1. The following view expressed by the Pyrton Parish Council is based on the consultations with the inhabitants of Pyrton preparatory to the drafting of the Pyrton Neighbourhood Plan (PNP). The draft PNP is currently open for consultation until 16 June 2017 and can be read at the Watlington Library, as well as online at https://docs.google.com/document/d/1q9g5w7vMYDBCSVAO8zeEKSh42JrNV3jPRj9rn
- 1ULIfs/pub.
- 2. The draft PNP recognises the important role that Watlington currently plays for Pyrton residents in supplying services and facilities that Pyrton lacks. The draft Watlington Neighbourhood Development Plan (WNDP) underlines the extent to which the town and surrounding settlements, including Pyrton, have been mutually dependent (p. 23). Watlington's future development is a vital interest for Pyrton, and Pyrton residents would like to see Watlington to grow in a manner that enhances its prosperity, while preserving its distinctive character within its natural setting and without harming the identity, integrity and environment of neighbouring settlements.

#### Re-alignment of the B4009

- 3. The draft WNDP insists that it "recognises the importance of maintaining the distinct character of both Watlington and its close neighbour Pyrton. Both are historic settlements (with designated Conservation Areas) surrounded by farmland. The separation of the two settlements is essential to maintain their integrity and the green space between them is environmentally sensitive" (p. 25). Indeed, one of the objectives of the draft WNDP is "to protect and enhance the surrounding landscape and the Chilterns Area of Outstanding Natural Beauty (AONB)" (p. 3). Another is to protect and enhance the town's "rural setting surrounded by farmland" (pp. 14, 16). These considerations lay behind the ruling of the Kirkham report against any development on PYR2 "due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape" (p. 42).
- 4. Notwithstanding the above statements, the draft WNDP proposes to drive a re-alignment of the B4009 through the "environmentally sensitive" PYR2 at a distance from "the existing built form of Watlington in order to create a new edge to the settlement" (p. 24). In practice, although the draft WNDP does not spell this out since PYR 2 lies outside the boundaries of the WNDP area, any re-alignment of the B4009 will be accompanied by extensive housing that will obliterate the green space between Watlington and Pyrton, and cause the coalescence of the two settlements. It will also cause damage to the setting of the Chilterns AONB and of the Shirburn registered park and gardens, as well as to the Pyrton Conservation Area and the grade 2\*-listed Pyrton Manor. The recent SODC ruling and refusal of planning to build at East Hagbourne is directly relevant here (P15/S3228/0).

#### Proposed development of PYR1 and PYR2

- 5. It is for these reasons that, reflecting the views of the overwhelming majority of Pyrton residents, the draft PNP stands opposed to the development of PYR2 and advocates retaining this as a designated green space. This is to ensure there remains visual and physical separation between Watlington and Pyrton, that both Watlington and Pyrton remain surrounded by farmland, so preserving their rural setting, and that the Chilterns AONB is not damaged by a sizeable development that will gravely affect the view from Watlington Hill. The realignment of the B4009 would cause light, air and noise pollution for Pyrton residents and the concreting over of PYR2 is likely to exacerbate current problems of flooding in the Pyrton Conservation Area, including in listed buildings.
- 6. The draft PNP endorses and recommends development of housing of appropriate style and density on PYR1, a brownfield site that used to be owned by the MoD. This housing will help to meet area demand, since there is no housing demand within Pyrton, which, as an 'other village', has no set new housing allocation.
- 7. The draft WNDP asserts that any development on PYR1 and PYR2 "would relate to Watlington and rely on the services and facilities of the town. Any such development on these two sites should, therefore, count towards any allocated growth for Watlington". As all neighbouring settlements depend to a large extent on Watlington's facilities, this argument involves a non-sequitur. In the Pyrton Parish Council's view, any development on PYR1 (and PYR2) would relate to the parish in which the land is located, viz. Pyrton, since this reflects the fundamental principle underlying the preparation of neighbourhood plans, as endorsed by SODC. The boundary line between Watlington and Pyrton parishes was reviewed and altered at the start of the neighbourhood plan exercise. Pyrton Parish Council would therefore be the appropriate recipient for any associated Community Infrastructure Levy funding.

#### **Traffic and pollution issues**

- 8. Pyrton Parish Council and residents are sympathetic to the concerns of Watlington residents over traffic levels within the town and the resulting pollution that damages the health of residents and those working in Watlington. However, they question whether stricter enforcement of existing traffic restrictions (e.g. the 7t weight limit) or introduction of new ones would not resolve many of the issues experienced by Watlington. The draft WNDP does not present traffic movement data to justify the conclusions reached about the need for the realignment of the B4009 and does not consider alternative solutions that are less intrusive and costly. In some respects the draft WNDP data on local and through traffic does not match that offered by other studies.
- 9. We await the promised Watlington Traffic Management Strategy. Pyrton will meanwhile conduct its own traffic study, with particular emphasis on the creation of choke points and dangerous intersections, as well as the risk of a rat-run through Pyrton to avoid bottlenecks on the newly aligned B4009.
- 10. Given the heavy costs of driving a road through PYR2, we consider it vital that research into projected traffic flows be conducted to ensure that a road around Watlington does not generate even more traffic than exists currently, aside even from that linked to associated new housing. It is likely to encourage an even more car-dependent community and lead to congestion that will merely transfer pollution from central Watlington to the north-west

periphery. In our view, the construction of a disfiguring and despoiling relief road on PYR2 will create a new problem to replace the existing one.

- 11. At present the draft WDNP presents air pollution as a major driver for the realignment of the B4009. However, as we understand it, current policy lies in the Air Quality Action Plan (AQAP) 2014, adopted by SODC in 2015, which has identified a resolution for air quality in Watlington. According to this improvements can be made to the route through Watlington by removing parking and increased enforcement of the weight restriction zone (see <a href="http://www.southoxon.gov.uk/news/2016/2016-07/how-will-proposals-reduce-vehicle-emissions-watlington-wallingford-and-henley-affe">http://www.southoxon.gov.uk/news/2016/2016-07/how-will-proposals-reduce-vehicle-emissions-watlington-wallingford-and-henley-affe</a>). Air pollution is a matter for SODC environmental health and cannot be employed as a policy to drive the case for a relief road that lies at the core of the draft WNDP, in disregard of the AQAP. In practice, the imminent government drive to reduce diesel emissions and the greater efficacy and popularity of electric cars are likely to have reduced the pollution effect substantially by the time any realigned B4009 is completed. They may well render that expensive investment redundant.
- 12. Meanwhile, the new routing is likely to do substantial damage to the businesses and shops in the centre of Watlington that will be marginalised by the realigned B4009. Such an impact will be in line with the experience of other town centres bypassed. For current Pyrton residents the new road with its congestion and HGVs could become an impediment that will reduce the incentive to use the steadily diminishing shopping amenities in Watlington, as against the more extensive and attractive services available in Thame or elsewhere.

Submitted on behalf of the Pyrton Parish Council

#### SC3 CUXHAM PARISH

Afternoon Rachel,

I have recently taken on the role of Chair of Cuxham with Easington Parish Meetings

I am writing in response to the note below just to let you know that we have discussed the Watlington NDP as a parish and have only one significant comment.

This relates to our concerns regarding the negative impacts of increasing traffic created by additional housing.

To be more specific, the Cuxham with Easington Parish are concerned about the impacts as follows:

- 1) The safety for residents and visitors to Cuxham who have to share the only road through Cuxham with traffic of all types as there are no pavements throughout most of the village
- 2) The many listed buildings in the village, including a number which are situated directly on the B480 road
- 3) The Cuxham environment, and in particular the globally important chalk stream which is likely to suffer increasing pollution as traffic increases
- 4) Cuxham businesses

We understand the obligations you are under given the SODC LP 2033 latest draft and we simply ask you to

- a) Bear in mind the implications for Cuxham as the WNDP is further developed and
- b) Continue to highlight the Cuxham related issues as part of any meetings you may have with relevant authorities going forward

I have attached a document ("Protecting Cuxham") that we have recently sent to key leaders of SODC, OCC, and the EA to raise awareness of the issues for Cuxham in particular relating to the SODC LP 2033 Strategic Site at Chalgrove.

The arguments therein are also relevant to other smaller housing developments in the context that the aggregate of all the smaller local housing developments will also significantly increase traffic through Cuxham

I hope that this is helpful and would be very happy to discuss at any time with you and / or your colleagues

Many thanks

Ian Goldsmith Chair Cuxham with Easington Parish

#### SC4 WATLINGTON EQUESTRIAN GROUP

#### The Watlington Equestrian Group (WEG) on 23 May 2017

Katie Mahony (Chair), Julia Orr, Ally Mahoney, Lucy Kilroy, Sam Swanson, Lesley Hughes, Carolyn Boddington, Alex Hammersley, Rosanne Murison, Honor Murison, Pam Hardy, Bex Read, Sue O'Brien, Louise Summerley (14)

- Concern was expressed about the very likely impact of several housing developments as detailed in the South Oxfordshire District Council (SODC) Local Plan Second Preferred Options consultation and the Watlington Neighbourhood Development Plan (WNDP), on riders and horse road users. These include:
  - a. The development of Chalgrove airfield, with somewhere between 3,000-3,500 houses and no proposed access road to the M40. As a consequence, southbound traffic will have little option other than to drive through Cuxham and Watlington or seek to cut through to the A40 via Clare in order to get to the motorway. For non-motor vehicle road users the impact of double the amount of current traffic on B roads and country lanes could be devastating, in effect rendering them hazardous and unusable. This development is likely to affect anyone who rides or pony and trap drives on roads that connect the Icknield Way with other bridleways such as Green Lane (connecting Britwell Salome with Brightwell Baldwin and Cuxham), and the Oxford Way.
  - b. The Watlington Neighbourhood Plan proposes a new bypass road as a central feature around the west side of the town so as to take traffic away from the centre of the town. Whilst there was general support for alleviating traffic within Watlington, the current plan is much in excess of original proposals for a modest relief road connecting Pyrton Lane with the roundabout at Willow Lane and on through the Industrial Estate to link up with the B4009. The proposed by-pass is significant in scale and would require many more houses to be built than the 'minimum' of 238 referred to in the WNDP (between 400-700 according to their own estimates), to pay for it. This by-pass would present significant hazards to horse riders seeking access to existing bridlepaths in Pyrton and the Icknield way via Pyrton Lane and Station road.
- 2. The view of the WEG is that the legitimate and established needs of horse riders and pony and trap drivers must be taken into account by any local development plans. In particular, WEG would like to see:
  - a. Provision made for bridleways alongside and intersecting any new road developments.
  - b. The reduction of speed limits and clear signage pertaining to horse use on local roads.
  - c. Safe passages between bridleways maintained and extended to ensure safety is maintained at all times.
  - d. Safe crossing points wherever routes alongside road development cannot be made.
- 3. Katie Mahony agreed to submit this note to the WNDP on behalf of members of the WEG before the deadline for consultation on 29 May 2017.

Katie Mahony Chair

#### SC5 OXFORD DIOCESE

By email: info@watlingtonnp.org.uk

Dear Sir / Madam,

Re: Watlington Neighbourhood Plan Consultation 3 – Response by the Oxford Diocesan Board of Finance

I am instructed to respond to the latest consultation exercise in connection with the emerging Watlington Neighbourhood Plan.

The comments of the Oxford Diocesan Board of Finance (ODBF), who have an interest in the

planning appeal affecting the St Leonard's Church Hall site, are set out below:

- 1. The ODBF supports the general approach to managing future development in the Plan area, but questions the status of the 2017 Watlington Design Guide which is not the subject of formal public consultation and which will inevitably therefore carry only limited weight.
- 2. The ODBF objects to draft Policy 3 insofar as the only plan that appears to illustrate the policy statement in the Map Supplement concerning Chalk Streams shows the brook adjacent to the Church Hall site as a 'watercourse', implying it may be a Chalk Stream. As noted at p.27 of the appellants' appeal statement concerning the Church Hall site, the 'status' of internationally rare Chalk Stream was applied in error to that watercourse and therefore any ambiguity over this issue should be clarified in the Plan.
- 3. Allied to 2 above, page 5 of the 2017 Design Guide states "Chalk Streams are a precious habitat. Avoid hiding the precious Chalk Streams in culverts or including as part of a garden." There is no evidence that including a watercourse (Chalk Stream or otherwise) within a garden causes harm. Indeed, it may present an opportunity to enhance and manage that habitat where it is not currently managed, and therefore this statement ought to be amended.

In the case of the appeal scheme at the St Leonard's Church Hall site, the management of the watercourse habitat at the end of the two proposed dwellings' gardens was addressed through the provision of a habitat management plan, to be secured by planning condition (C.14), helping to enhance the watercourse habitat where no management plan currently exists. The Watlington Environment Group Watercourses Project confirmed that their objection to the original plans had been overcome through the provision of a buffer zone on the amended plans, subject to the imposition of a condition to secure the appropriate management of that area (as required by C.14).

4. The ODBF cautiously supports the provisions on p.31 of the draft Plan and the associated draft Policy 6. Page 31 states "There will be a need to provide facilities for community activities which serve residents living in new developments to the north and west of the town. Space for informal outdoor and indoor recreation for all ages will be expected. Support will be given for a new community building, or potentially provision for youth groups and/or improved facilities at St Leonard's Church to sustain its role as a community resource." However, whilst the draft Policy and associated provisions are positive, the purpose of the planning appeal at the Church Hall site is in order to provide funding towards the improvement of the St Leonard's Church building, for the benefit of the wider community. The evidence prepared in support of the planning application on the hall site, and the planning appeal, demonstrates that this is the best solution, not a new community building. As a consequence, the ODBF recommends that any Community Infrastructure Levy money raised from new development and intended to support new/improved community facilities at St Leonard's Church (see p.32) should be spent on the Church and not on a new community building on the hall site.

We trust that the above is helpful in informing the subsequent stages of the Neighbourhood Plan. Should you have any questions in connection with the above please do not hesitate to contact Bluestone Planning.

#### SC6 RESIDENT COMMENT

#### Watlington Neighbourhood Development Plan Consultation May 2017

Having read through the Draft NDP and associated documents I would like to thank you for all the work you have put into this. I am generally in support of the Plan and the policies therein but I wish to make the following comments which didn't seem to fit into the questionnaire. I hope this is OK.

My first point is that I reject the housing figures of the SHMA as I believe them to be statistically unsound and purely aspirational. Nor do I believe that South Oxfordshire, and the other districts in the county, should have to provide for Oxford's unmet housing need when Oxford City does little to help itself and continues to insist on using land for employment purposes thus creating an even greater demand for housing since there is virtually full employment in Oxford. However, this point is beyond the scope of the NDP and I accept that you have to work with the figures for housing that SODC are putting forward in their updated Local Plan.

#### 2.SETTING THE SCENE

#### 2.1 Qualifying Statement

2<sup>nd</sup> paragraph 'Because the Local Planning authority must have regard for a legally approved NDP, the future of Watlington can, to a considerable extent, be shaped by the wishes of the community.' The words 'considerable extent' could be misleading since the NDP must comply with the South Oxfordshire Local Plan to become legal, and not all residents may realize how much the NDP is constrained by the Local Plan.

#### 4. VISION AND OBJECTIVES

#### 4.1 Vision

I am not sure if a re-aligned B4009 can be achieved with the infrastructure money from just 283 houses.

I am pleased to see later (8.4) that you want the new road to be similar to what it is now – limited in width, with speed and weight limit and with verges, hedges and trees so that it still looks like a country road. It's no good passing on a worse traffic problem to Britwell Salome, Cuxham and Shirburn by creating a fast 'by-pass'.

#### 5. WATLINGTON

#### 5.1 Character of the town, etc.

Why is there mention on p.17 of a large number of black and white buildings? Surely the majority of the early timber framing is hidden behind later brick facades. Nettlebed bricks are the visible characteristic of Watlington houses. The gift of the Town Hall healed the divisions of the Civil War, not the Civil War itself. And weren't a number of council houses pre WWII?

#### 6. POLICIES

POLICY 4

It is good to see rural exception sites mentioned at top of p.29. Any chance of investigating Community Land Trusts?

POLICY 6

P.30 Don't believe what Thames Water tells you. They are struggling to cope and I have been told that at one new housing development in the Didcot area they are taking the sewage away by tanker because the sewage works are inadequate.

P.31 The idea of a swimming pool must be only a dream. A pool, even if you can get the money to build it in the first place, is very expensive to maintain and CIL money cannot be used for on-going costs.

#### POLICY 8

I am sad to see good Grade 2 agricultural land being sacrificed. Mitigation cannot compensate for the loss of food production.

8.4 I support the idea that neighbouring housing developments must be integrated. This idea is now in the SOLP 2033. Paragraph two is especially important. Infrastructure MUST precede development.

8.6 And I fully support i) Staff accommodation for the Care Home & ii) Sheltered Accommodation for Elderly People. I believe the latter idea was rejected when the care home was first built. I also endorse iii) Park Homes Site & iv) Rural Exception Sites.

#### **Sustainability Appraisal with Environmental Report**

P.20 The Chilterns Conservation Board requested that you consider visual impact from views other than from Watlington Hill. Have you considered views towards the AONB from the road running along the ridge between Clare and Cuttmill? You get amazing views from there towards the hills and the proposed sites might be visible from there.

7.2 I am pleased to see Dark Skies mentioned in this table of mitigation measures. It is very important that light pollution is not just ignored.

P.38 You mention the LEP and the SEP. The former is not democratically accountable and in producing the SEP certainly has not consulted the communities of Oxfordshire. It is a pity we have to dance to its tune to the detriment of the South Oxfordshire countryside and its people.

#### **Maps**

I am not sure if the map showing the development history of Watlington is strictly accurate. Orchard Walk appears to date from before 1900!

It would be helpful if the improvements suggested for footpaths were shown on a map as I could not identify them all. I have not found the Green Space Paper so perhaps they will be shown there.

#### SC7 RESIDENT COMMENT

#### RESPONSE TO WATLINGTON NEIGHBOURHOOD PLAN CONSULTATION 3

18<sup>th</sup> April – 29<sup>th</sup> May 2017 27 May 2017

I was born in Pyrton, grew up here and have chosen to raise my young family here

- 2. I greatly value Watlington as Pyrton's neighbourbouring town and a place where many of my friends and family live. My family and other residents of Pyrton are dependent on Watlington's services and facilities, as outlined on page 23 of the WNP, and recognise that it needs to grow, but in a sustainable way preserving its distinct character as a rural market town and without harming the identity and environment of Pyrton and other neighbouring settlements.
- 3. I complement Watlington on recognising in its draft NDP the 'importance of maintaining the distinct character of both Watlington and its close neighbour Pyrton. Both are historic settlements (with designated Conservation Areas) surrounded by farmland.' I agree that the separation of the two settlements is essential to maintain the integrity of both communities and the green space between them, which is environmentally sensitive (p. 25). One of the objectives of the draft WNDP is 'to protect and enhance the surrounding landscape and the Chilterns Area of Outstanding Natural Beauty (AONB)' (p. 3), and another is to protect and enhance the town's 'rural setting surrounded by farmland' (pp. 14, 16). These considerations lay behind the ruling of the Kirkham report against any development on PYR2 'due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape' (p. 42).
- 4. Despite these statements, your draft WNDP proposes to re-align the B4009 through the 'environmentally sensitive' PYR2 (a field in Pyrton parish) at a distance from 'the existing built form of Watlington in order to create a new edge to the settlement' (p. 24). What does not appear to have been taken into consideration, however, is that any re-alignment of the B4009 will almost certainly have to rely on funding created by development that will inevitably destroy the green space between us. This will lead in the coalescence of Watlington and Pyrton and the destruction of the rural environment that characterises our two settlements.
- 5. The proposed new road will despoil the view to and from the Chilterns AONB. Noise, light and air pollution will have a devastating impact on the environment of Shirburn registered park and gardens, Pyrton Manor (grade 2\* listed) and Pyrton's conservation area (not to mention the impact on the children at Watlington school

as the road would cut across their playing field). Pyrton is also directly down hill from PYR2 and a road (and resulting development) is likely to exacerbate current problems of flooding. I believe that the recent SODC ruling and refusal of planning to build at East Hagbourne has a direct relevance to PYR2 (P15/S3228/0).

- 6. At present the draft WNDP presents air pollution as a major reason for the realignment of the B4009. I sympathise with Watlington residents over traffic levels and pollution in the town, but I believe stricter enforcement of existing traffic restrictions using cameras and/or the introduction of further restrictions would greatly help with this problem. In my opinion, the new road is not a solution to Watlington's current problems and will increase rather than reduce them. The recent publication of a CPRE study entitled 'The end of the road? Challenging the road building consensus' shows that so called relief roads fail to deliver their oftenclaimed benefits...specifically they
- a) induce traffic... generating a lot more traffic than the problem they were intended to solve
- b) lead to permanent and significant environmental and landscape damage and
- c) show little evidence of economic benefit to local communities.
- 6. Furthermore, I believe the road proposed in the draft WNDP will transfer the problems of traffic and pollution to its neighbouring villages and have a huge impact on the environment of its own school. It will also have a devastating impact on shops and businesses in Watlington that will loose their passing trade as demonstrated when the B4009 through Watlington was closed for several weeks when cables were being buried to connect to a nearby solar farm and indeed, by what happened to the shops and businesses in Wallingford after their bypass was built.

#### SC8 RESIDENT COMMENT

#### RESPONSE TO WATLINGTON NEIGHBOURHOOD PLAN CONSULTATION 3

#### 26 May 2017



- 2. We have lived in Pyrton for 49 years. Before that I was a regular visitor to stay with my grandmother in Couching Street from January 1958 and she had relatives who lived in and around Watlington for at least 100 years before that. As such, our comments are based on a considerable depth of knowledge about our two parishes.
- 3. We acknowledge Watlington's importance for Pyrton residents we use your schools, services and facilities. Indeed, all your surrounding settlements, villages and parishes are and always will be, in part, dependant on Watlington. As such, we would like to see Watlington grow in a manner that enhances its prosperity, while preserving its distinctive character within its natural setting. We hope this goal can be achieved without harming the identity, integrity and environment of your neighbouring settlements.
- 4. Re-alignment of the B4009. Your draft WNDP says that it "recognises the importance of maintaining the distinct character of both Watlington and its close neighbour Pyrton. Both are historic settlements (with designated Conservation Areas) surrounded by farmland." We agree that the separation of the two settlements is essential to maintain the integrity of both communities and the green space between them, which is environmentally sensitive (p. 25). One of the objectives of the draft WNDP is "to protect and enhance the surrounding landscape and the Chilterns Area of Outstanding Natural Beauty (AONB)" (p. 3), and another is to protect and enhance the town's "rural setting surrounded by farmland" (pp. 14, 16). These considerations lay behind the ruling of the Kirkham report against any development on PYR2 "due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape" (p. 42).
- 5. Despite these statements, your draft WNDP proposes to re-align the B4009 through the "environmentally sensitive" PYR2 at a distance from "the existing built form of Watlington in order to create a new edge to the settlement" (p. 24). What you fail to stress, no doubt because PYR 2 lies outside your WNDP boundary, is that any realignment of the B4009 will almost certainly result in calls for extensive housing that is likely to destroy the green space between us. Inevitably this will lead to a coalescence of our two settlements and then to the demise of historic Pyrton.

- 6. We believe that such proposals will also damage to the setting of the Chilterns AONB and of the Shirburn registered park and gardens, as well as Pyrton's Conservation Area and Pyrton Manor (grade 2\* listed). We believe that the recent SODC ruling and refusal of planning to build at East Hagbourne has a direct relevance to PYR2 (P15/S3228/0).
- 7. Proposed development of PYR1 and PYR2. We and the overwhelming majority of Pyrton residents are opposed to the development of PYR2. Our draft PNP advocates retaining this agricultural land as a designated green space and thereby maintain a visual and physical separation between us. We want to ensure that both Watlington and Pyrton remain surrounded by farmland to preserve their rural setting. We also do not want to see the Chilterns AONB damaged by any sizeable development that will gravely affect the view from Watlington Hill. Your proposed realignment for the B4009 would cause light, air and noise pollution for Pyrton residents and for both your schools. Any building and roads on PYR2 is likely to exacerbate current problems of flooding in the Pyrton Conservation Area and its listed buildings.
- 8. Our draft PNP recommends the development of housing of appropriate style and density on PYR1, the former MIOD brownfield site. This will help meet area demand. The draft WNDP asserts that any development on PYR1 and PYR2 "would relate to Watlington and rely on the services and facilities of the town. Any such development on these two sites should, therefore, count towards any allocated growth for Watlington". We believe that any development on PYR1 (and PYR2) must relate to the parish in which it is located, surely a fundamental principle set by SODC when the preparation of neighbourhood plans was set in motion.
- 9. <u>Traffic and pollution issues</u>. We sympathise with Watlington residents over traffic levels and pollution in the town. However, we favour stricter enforcement of existing traffic restrictions and/or introduction of further restrictions, as mooted by your Councillors at our early joint NP meetings. When you can present more traffic data, we believe your draft WNDP will not be able to justify your call for the realignment of the B4009. What you need to consider are alternative solutions that are less intrusive, much less costly and will cause less pollution to your two schools, both of which lie downwind of your re-aligned road.? Perhaps the promised Watlington Traffic Management Strategy will cause you to revisit these issues.
- 10. If you wish to create a road through PYR2, it will cost much and will damage both the landscape and the environment as we have stated above. Following precedents seen in other "bypasses," it will also create huge levels of "induced traffic", none of which uses the Watlington area now. In time, your relief road (or bypass or whatever you choose to call it) is likely to encourage Berkshire to resurrect its "third Reading Bridge" arguments and thereby increase traffic levels far above anything mentioned or alluded to in your draft WNDP. Such increases are also likely to cause overwhelming traffic problems in many surrounding villages. As such we consider that your WNDP suggestion for a relief road on PYR2 will create major new problems

that will far exceed the existing ones. And, if your WNDP road has to be paid for with many more houses on the periphery of Watlington, you must acknowledge that the majority of your new residents will choose to drive into Watlington to shop either routing down Shirburn Street from the north or up Couching Street from the south. Both will meet at the Town Hall crossroads. This begs another key question - are you proposing to solve or to exacerbate your perceived problem?

#### SC9 RESIDENT COMMENT

#### RESPONSE TO WATLINGTON NEIGHBOURHOOD PLAN CONSULTATION 3

18th April - 29th May 2017

#### 29 May 2017

I object principally to the proposal in the draft WNDP to re-align the B4009 through the 'environmentally sensitive' PYR2 at a distance from 'the existing built form of Watlington in order to create a new edge to the settlement' (p. 24). This new 'relief' road around Watlington cuts through Pyrton Parish land. On the one hand the draft WNDP recognises the environmental importance of this green space, but on the other hand it seeks to destroy it by building a new road through it. This road will obviously have to rely on considerable development for funding, which is also something not discussed in the draft. This new road will forever spoil the rural environment of both Watlington and Pyrton and lead to coalescence of these two settlements.

The impact of the new road cutting through PYR2 is not fully examined in the draft WNDP. It will drastically affect the view to and from the AONB resulting in permanent landscape damage and creating noise, light and air pollution. It will also have a detrimental impact upon the environment of the built heritage assets around as it will pass close to the boundaries of both Shirburn Castle's Registered Park and Garden and the Grade II\* listed Pyrton Manor, not to mention Watlington School. Noise and light pollution from this new road will also devastate the rural environment of Pyrton's conservation area which includes 22 listed buildings and many others of heritage value.

By building a new road suitable of carrying HGV's and taking heavy loads of traffic it seems highly likely that Watlington is going to exacerbate the problems it seeks to reduce, such as traffic levels and air pollution. I also do not believe that a new road around the town will reduce the current amount of traffic passing through its centre. Instead, Watlington should be seeking stricter enforcement of existing traffic restrictions in the centre of town using cameras and introducing further restrictions.

In summary, the draft WNDP is flawed by the argument that a new 'relief' road would reduce traffic and air pollution problems - it can only exacerbate them and push these problems onto other areas of the town and its neighbouring settlements. Furthermore, this new road can only be funded by considerable development - over development for a rural market town to a number far exceeding that required from Watlington by SODC. I believe in sustainable growth, but do not believe that this is something presented in Watlington's draft NDP.

#### SC10 CARTER JONAS

### Carter Jonas

Watington Parish Council Parish Office, 1 Old School Place, Gorwell, Watington, OX49 5QH One Chapel Place London W1G 0BG T: 020 7518 3200 F: 020 7408 9238

Your ref:

Our ref: 3988800v1

1 June 2017

Dear Sir/Madam

#### DRAFT WATLINGTON NEIGHBOURHOOD DEVELOPMENT PLAN - CONSULTATION 3

This submission is made by Carter Jonas on behalf of the Homes and Communities Agency (the HCA) in respect of the allocations and policies set out within the Draft Watlington Neighbourhood Development Plan and in particular the relationship between Watlington and Chaigrove Airfield which is allocated for development within the emerging South Oxfordshire Local Plan (Regulation 18 – Second Preferred Options) (SODC Local Plan). This letter seeks to provide further background to the HCA and the proposals at Chaigrove Airfield and the relationship with Watlington Parish Council.

On behalf of the HCA, we are writing to support the general provisions of the Watlington Neighbourhood Plan and note the comments raised regarding the impact of existing and potential traffic impacts within the Plan area. The HCA are committed to delivering appropriate and proportionate contributions to the funding of identified local infrastructure schemes, as well as providing suitable infrastructure to further mitigate any potential impacts. The HCA would be happy to meet with Watlington Parish Council to discuss the Chaigrove Airfield proposals in greater depth and outline the proposed infrastructure mitigation and how this will affect Watlington.

The HCA is the national housing, regeneration and social housing regulation agency for England and supports the creation of successful places by increasing the supply of housing and jobs, using its programmes, land assets and regulatory role to deliver investment that drives housing and economic growth.

The HCA acquired the freehold of Chaigrove Airfleid in 2016. Since this date, the HCA, supported by a large technical support team, including specialists in transport and highways, has progressed development and delivery options for this site, working closely with planning, highways and design teams at South Oxfordshire District Council (SODC) and Oxfordshire County Council (OCC). These options have been informed by stakeholders through community drop in events and workshops, culminating with an 'Enquiry by Design (EbD) event held over the 19-23 January 2017.

The EbD event comprised a combination of stakeholder presentations, design workshops, public exhibitions and presentations and client/consultant design sessions. The EbD event allowed the local community the opportunity to contribute to the design evolution of the site which in turn has influenced the emerging masterplan options. This event was well attended throughout and generated considerable interest leading to substantial input in the development of the Site.

Since the EbD event, the HCA has considered the feedback from the community and stakeholders. It has commissioned further technical work to inform the design of the proposals and respond to the questions asked through the process.

#### Carter Jonas

Alongside the stakeholder engagement undertaken to date, Chalgrove Airfield has been subject to continued site promotion through the preparation of the emerging SODC Local Plan and SODC's Call for Sites exercise resulting in the site's allocation. The HCA remain in discussion with the current site occupier Martin Baker Ltd. but remain committed to securing the long term future of the business on the site alongside the wider development of the site.

Chaigrove Airfield represents a highly sustainable location for strategic development. The site is brownfield, is not located within the Green Belt or within an AONB. The HCA are committed to delivering appropriate and proportionate contributions to the funding of identified local infrastructure schemes, as well as providing suitable infrastructure to further mitigate any potential impacts. We will be able to provide further detail of this mitigation upon completion of the necessary technical assessments.

The HCA would be happy to meet with Waitington Parish Council to discuss the proposals at Chaigrove Airfield and will be in touch directly to arrange a meeting following the General Election and we will be in touch after 9 June to arrange a mutually agreeable time.

We would be grateful if you could confirm receipt of these representations and keep us informed of the future consultation in the Draft Wattington Neighbourhood Development Plan.

If you have any queries on any points covered in this submission, please do not hesitate to contact me or my colleague, Kleron Gregson (kleron.gregson@carterionas.co.uk / 020 7016 0735).

Yours faithfully,

Nick Taylor Partner

E: nick.taylor@carterjonas.co.uk T: 020 7016 0733

#### SC11 THAMES WATER

## **South Oxfordshire – Watlington Neighbourhood Plan Submission Version**

Dear Sir / Madam

Thames Water are the statutory water and sewerage undertaker for the Watlington Neighbourhood Plan area and the whole of the South Oxfordshire. As such we have the following comments.

#### **General Comments on Sewerage/Wastewater Infrastructure**

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:

"Local planning authorities should set out strategic policies for the area in the Local Plan.

This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater...."

Paragraph 162 of the NPPF relates to infrastructure and states:

"Local planning authorities should work with other authorities to: assess the quality and

capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas."

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development"

(Paragraph: 001, Reference ID: 34-001-20140306).

**Specific Comments** 

Vision and Objectives

With the above in mind Thames Water would like to support objective 6a which seeks to ensure

Sent by email to: wndp@watlingtonnp.org.uk thameswaterplanningpolicy@savills.com

0118 9520 500

2 June 2017

that there is sufficient capacity with regards to water supply and waste water treatment to meet the needs of a growing population.

Page 30

On page 30 the Neighbourhood Plan states that 'Thames Water has confirmed that it does not expect to have a problem providing water supply and sewerage services to the proposed new developments.'

A stage 1 drainage strategy has been undertaken for the Watlington area, and whilst it anticipates growth can be accommodated, we do require developers to demonstrate that capacity exists. As such it is requested that the below is included to ensure clarity. 'In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Thames Water has undertaken a stage 1 drainage strategy for the Watlington area. Whilst it is

anticipated that capacity exists within the network and at their water and wastewater works, in some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Thames Water would therefore recommend that developers engage with us at the earliest opportunity to establish the following:

- the developments demand for water supply and network infrastructure both on and off site and can it be met:
- the developments demand for sewage treatment and sewerage network infrastructure both on and off site and can it be met; and
- the surface water drainage requirements and flood risk of the area and down stream and can it be met.

Further information for Developers on sewerage and water infrastructure can be found on Thames Water's website at: https://developers.thameswater.co.uk/

Contact can be made with Thames Water Developer Services;

by post at:

Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;

by telephone on: 0800 009 3921; or

by email: developer.services@thameswater.co.uk'

#### SC12 HISTORIC ENGLAND

WNDP Our ref: 2017.06.01

Watlington Parish Community Office
Your ref:
Watlington NP
Submission

1 Old School Place HE RLS Comments

Watlington 01483 252028

Oxon

wndp@watlingtonnp.org.uk Fax

by email only

1st June 2017

Telephone

To whom it may concern:

#### **Watlington Neighbourhood Plan Pre-Submission Version**

Thank you for consulting Historic England on the Pre-Submission Version of the Watlington Neighbourhod Plan. Historic England are the government's advisors on planning for the historic environment including the conservation of heritage assets and championing good design in historic locations. As such we have focused our comments on those areas that fall within our areas of interest. These comments are without prejudice to comments we may wish to make on individual planning applications within the plan area.

Policy 1. This is written as a positive (i.e. encouraging) policy, setting out conditions under which an application should be given positive support by the local planning authority. As such, it does not need to deal with the appropriate response to proposals likely to result in 'harm' to the heritage assets mentioned, which should be set out in the Local Plan, or where that is silent under the NPPF. The policy makes sufficient reference to parameters that should inform consideration of whether proposals have achieved the objective, including reference to the setting of the conservation area, views between the conservation area and AONB and the use of the Design Guide as a source of reference. This helps to provide a neighbourhood level implementation of national or local policy. As such we feel that the policy provides clarity without stifling innovation. Nevertheless it does leave room for the

District Council and applicants to make their own assessment of the significance of these assets and any contribution their settings may make to them.

Watlington Housing Policies: Sites A, B and C. The plan's introductory sections make clear the antiquity of settlement in the parish and we have seen that, historically, this originated as a 'dispersed' settlement with several early foci spread around the parish, which only started to become more focused in the present town in the high medieval period through the establishment of a market place. The find of a notable Viking age hoard in an area without other previous archaeological finds suggests the potential for areas of archaeological remains outside the current built-up area and areas of known archaeological remains. Given the large size of the allocation sites there is potential for considerable impacts on archaeological sites should any remains be present. As the three sites are contiguous such an impact could be considerable if it is cumulative across one or more site. As such we recommend that a requirement to undertake archaeological investigation to inform the layout of development proposals prior to submission of a planning application should be included within each of these policies. Suitable wording in each case might be an additional bullet point stating:

"The layout is informed by the findings of a programme of archaeological investigation agreed in writing with the Council's archaeological advisor and seeking to preserve remains in-situ, giving the great weight to the preservation of any remains of National importance."

We would request that if the steering group agrees with this recommendation, that the sustainability appraisal is amended to identify the potential harm to previously unidentified archaeological remains from development of these sites and the amendment of the policy including requirement to inform proposals with the findings of archaeological investigation as the appropriate mitigation.

We have given thought to the appropriateness of this large, cumulative allocation and it's potential impact on the historic environment. However our assessment is not based on personal knowledge of the sites or on site assessment visits. Nevertheless, we can see that given the desirability of preserving the character or appearance of the conservation area, including its setting and the relationship it has with open farmland and the Chilterns escarpment to the south, as well as the presence of sites with archaeological potential to the south west of the built-up area and the size of the identified housing need, these three sites appear to represent the least harmful option, as well as, potentially, providing the opportunity to remove heavy through traffic through the conservation area (which would be a benefit to the historic environment if it is achievable).

We are concerned that each of these Greenfield sites contributes has positive landscape character, including distinctive views from public roads across the settlement's rural setting including mature rural hedgerows or grassed verges running directly into the fields north east of Cuxham Road. In each case we strongly

recommend that the site allocation policy is augmented to require development proposals to preserve a green landscape setting on either to the roads bounding the sites, with development set back from the main road on it's own road network and to retain mature hedgerows or field banks where possible.

We also recommend that the site allocations policies include an additional requirement to require the layout of development to include consideration of the appearance of the built edge in views from the landscape to the north east and west and to provide a rural character settlement avoiding an appearance of regimented suburban style developments. It may also be helpful to consider whether this should avoid development greater than two stories in height.

We hope these comments are helpful but will be pleased to answer any queries relating to them or provide further information if necessary.

Yours faithfully

Robert Lloyd-Sweet

Historic Places Adviser (South East England)

Historic England

Guildford

Tel. 01483 252028

E-mail: Robert.lloydsweet@HistoricEngland.org.uk

#### SC13 WATLINGTON WATERCOURSE GROUP

#### Submission to Consultation 3 on Watlington Neighbourhood Development Plan

Submitted on behalf of Watlington Environment Group Watercourses Project by Michael Chadwick, 35 Littlewood, Stokenchurch, Bucks., HP14 3TF.

I trust this "freeform" submission is acceptable, since I am not sure how best to relate the comments to the questionnaire format. Technically, I guess these constitute "objections" rather than support, although only to the detailed wording.

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We have comments on 2 Policies:

#### Policy 3:

We suggest an amendment to point 3b so that it would read "Ponds, streams, and the springs and groundwater sources of the streams, are protected and enhanced in line with guidance from the Environment Agency"

#### Rationale:

- a) to avoid any risk that the current draft wording of the Policy be interpreted to mean that only chalk streams (and not all streams) should be protected, which would also then lead to disputes over which streams are chalk.
- b) to widen protection to the sources of the streams, since these are fundamental to their health and quality.

A slight disadvantage of this suggested rewording is that it removes the reminder within the Policy itself that many of our streams are chalk streams. But this can be dealt with by stressing that point in the text accompanying the Policy, and elsewhere within the Plan.

#### Site A:

We request amendments to a number of the bullets in the "planning proposals" for this site, viz 3rd bullet: amend to "conserves and enhances the chalk stream alongside the north-eastern boundary";

4th bullet: amend to "designate the Flood Zone area as a Local Green Space, with the primary objective of maximising its ecological value, complimenting the adjacent chalk stream"; 5th bullet: between "sufficient space" and "for informal recreation" add "elsewhere on the site"; 6th bullet: amend / expand to "safeguards the route for a re-aligned B4009, noting that the design of

the route in the north-eastern corner of the site and at its junction with the B480 must include measures to conserve or enhance the adjacent chalk-stream."

#### Rationale:

a) all the above proposed amendments are intended to stress the priority to be given to ecological improvements (since the considerable opportunities provided by this site must be taken advantage of); and of the need to protect the chalk stream.

Michael Chadwick, 29th May 2017

# SC14 OXFORDSHIRE COUNTY COUNCIL See separate 12 page document

#### SC15 TRUSTEES OF THE TOWN HALL

## Watlington Town Hall and the Neighbourhood Plan Statement from the Trustees of the Town Hall

May 2017 Watlington's residents all share a pride in the unique building that is at the core of its commercial area – the 1664 Town Hall. Many locals will know at least something of its history – as a Market Hall and, for more than two centuries, as a school. The building has been the frontispiece of Volume 8 of the Victoria County History and has long been a grade 2\* listed building. statement here we express the wish that more people should share our deep concern that the building faces increasing risks that are set by the passage of both increasing numbers of vehicles and the size of so many of those vehicles. As individual trustees, we may not share firm views regarding the location or size of new housing or commercial development or the direction of new roads. However, we do belief that any future plan for the Town until 2031 should make specific reference to a) the need to offer greater protection to the Hall and b) improvements in the general setting of the Hall, set in the Market Place of an ancient town. Even as recently as the 1990s the elevations of the Hall rose out of tarmac that was the roadway on all sides of the building. Part of the scheme, funded by the generous grant from the District Council, has prevented vehicles reaching the walls. But the 'apron scheme' had on effect that was to place the footings of the building further under the road level. More significantly of course has been the steady advance in the weight of vehicles, passing so closely by. While some weight may be offset by a multiplicity of axles, it is a common experience while in the hall to sense the rumbling and juddering of HGVs In 2012, the Trustees commissioned a report from The Cox Clifford Partnership. The remit set for the consultants was quite wide but part of the task was to record the building's faults. We are attaching to this note the sections of the report that record cracking to walls. Most significantly cracks are recorded in proximity to arches on all four elevations. These may not be at a point as to require urgent treatment, but they are impacts that are unwelcome. Indeed they ought to be deplored by all who love our Town. Another matter for concern is that, as Trustees, we need to attend to levels of motor-borne pollutants in the regular cleaning of the building. Further, the apron scheme has not eliminated splashing from water and mud (especially on the easterly elevation). This has caused Hall

managers to re-point regularly mortar and to replace bricks. This is not ideal practice for a building among those with the highest grading in England. The building's best interest might well be served by a certainty that vehicle numbers will be reduced (whether by a road or roads on the edge of Watlington or changes elsewhere in the Oxfordshire network or both). We believe too that all who share responsibility for roads (from national government to the parish council!) should press for a rigorous enforcement of weight restrictions and the reduction of speeds in the centre of the community. Such regulation may be no less important after new roads are formed. Buildings are silent during consultations! Uniquely perhaps, the managers of the Town Hall can speak up and make a contribution to debate. Ours is perhaps the most celebrated of historic buildings – but we stress too the importance of shaping plan statements and policies that reduce the jeopardy many structures faced with the tide of traffic in Watlington. Town Hall Trustees

#### SC16 PROVIDENCE LAND

#### Comments on behalf of Providence Land Limited, prepared by Howard Sharp and Partners LLP.

Providence Land Ltd (PLL) is the promoter of Sites B and C as well as PYR2 in the draft Pyrton Neighbourhood Plan. We act for the landowners, who are all willing to make those sites available for development, not only to meet the housing needs of the town, but also the associated infrastructure requirements. We are very pleased to see that the Draft Plan recognises the opportunity to meet housing needs in a way that also comprehensively tackles transport and air quality issues. We believe that housing growth should be used a means of improving the quality of the town's environment and we commend the Parish Council for a spatial strategy that seeks to achieve this. PLL specifically supports the Plan's key objective of safeguarding land for a re-aligned B4009 to the north and west of the town in order to reduce the flow of traffic through the town centre and to improve air quality. Only with the provision of this route can there by the necessary restrictions in the town centre to deal with the current severe problems of through traffic congestion. With the SODC Local Plan Second Preferred Options consultation now proposing to safeguard a route for such a bypass, there is a clear strategic transport justification that both Watlington and Pyrton Neighbourhood Plans must accommodate. Clearly the best approach to delivering such an alternative route is to work positively with landowners and developers who are able to release the land for the alternative route if there are sufficient housing numbers to unlock this. The distribution of the preferred housing allocations is divided between three sites along this proposed route which have been chosen on the basis of a systematic analysis of development options and two previous consultations and we support this. We agree with the key objective of the Plan providing a minimum number of 238 new homes to meet the housing needs identified by the WNDP and the requirements of the emerging South Oxfordshire Local Plan 2033. We are pleased to see this number specified as a minimum as clearly more than this is required to deliver the bypass. Our view is that the number of new homes needed to deliver a bypass route in full for the town is in the region of 300-400 homes, of which around 238 within the Watlington Neighbourhood Plan area would be reasonable. The additional housing numbers would, of course, fall within the Pyrton Neighbourhood Plan Area on PRY1 (Land at the former MoD site on B4009) and PRY2 (Land to the East of Pyrton Lane). As the town falls within the 'larger village; category of the adopted Core Strategy and emerging Local Plan, this scale of development is broadly proportionate to the scale and function of the town and position in the settlement hierarchy. It would not be a reasonable alternative to provide less homes and by doing so, failing to grasp the opportunity to deliver a comprehensive traffic solution. We suggest the housing numbers for the town as a whole should comprise around 120 on Site A, around 120 on Sites B and C together and around 120 on PRY1 and PRY2 together. We believe it is important for the Watlington Neighbourhood Plan to explicitly state how each site along the route of the bypass can contribute to the overall vision of taking through traffic out the town and not to allow one site to dominate in terms of housing numbers. The strategy relies on willing landowners who are prepared to make the land available and to fund parts of the route where it relates directly to their own development. Each section of the route will need to deliver an appropriate proportion of the housing requirement for the strategy to be effective. To address the above, we suggest that rather than just stating an indicative capacity for each development site, there should be a proposed dwelling number specifically for each site to help avoid a substantially higher level of development than that the public support for the town as a whole. Neighbourhood Plan examiners are now routinely endorsing the use of the words 'approximately' for the capacity of housing sites (see, for example the recent examiner's report for the Olney Neighbourhood Plan in Milton Keynes Borough). A precise number is generally considered to be too prescriptive and does not offer the flexibility to allow the appropriate scheme to emerge, once it is known the mix of housing types and sizes of units. But if the policy itself does not state the approximate dwelling numbers that would be appropriate for each site, then it risks speculative applications which would unbalance the Plan strategy. This is a particularly important issue for Watlington, where five sites are required to deliver the bypass, two of which lie outside the Neighbourhood Plan area. The public should understand how each site contributes to the whole vision for the town. PLL already have a live application for up to 100 homes running on PYR2 (P16/S2576/O) with a reserved corridor for the bypass agreed with County Highways and we understand the promotors of the other sites are also preparing planning applications. PLL are willing to put in planning applications on Site B and C to secure this central section of the bypass and demonstrate its deliverability. We suggest that the Plan should state that each site will be brought forward in accordance with a comprehensive masterplan to ensure the delivery of essential transport infrastructure. Clearly the precise alignment of the route and its design and specification will need to be agreed with County Highways on all the proposed sites. We have already agreed with the County - for PYR2 - a bypass corridor width based on a 6.5m carriageway, 3m pedestrian/cycle route and 3m separating verge. There will also need to be agreement of the precise funding contribution via the Homes and Communities Agency to address any additional traffic generated by the proposed new settlement at Chalgrove Airfield. These matters do not require a long time period to resolve. We understand there is commitment in principle from all levels of Government to work pro-actively with developers to deliver the project rather than resorting to lengthy CPO and direct land assembly. Furthermore, the Homes and Communities Agency have been in discussions with the relevant authorities for several months now on the funding package as part of the Chalgrove Airfield mitigation. So for the first time, the town has all the elements in place to permanently address the through-traffic problem. Other comments on the Plan as a whole not addressed in Part B below: Housing policies Site A - Land between Britwell Road and Cuxham Road – there should be an explanation of why the site is proposed as having an indicative capacity of 140 dwellings when the SODC Landscape Capacity Assessment recommended that, on visual and landscape grounds, a much-reduced area be used for development allowing for 65 dwellings. There is no clear indication of how the policy relates to the landscape evidence. Site B - Land Off Cuxham Road and Willow Close – we support the proposed allocation and as the promoters of the site we re-affirm its availability for housing. We have undertaken some initial masterplanning work and can confirm that by broadly following the bypass route in the draft Neighbourhood Plan there is around 2.4ha of developable area within the line of the bypass which would accommodate approximately 60-70 dwellings. Beyond the bypass, there is scope for public open space and extensive landscaping to visually mitigate the scheme. Site C - Land off Pyrton Lane - we support the proposed allocation and as the promoters of the site we re-affirm its availability for housing. We have undertaken some initial masterplanning work and can confirm

that by broadly following the bypass route in the draft Neighbourhood Plan there is around 2ha of developable area which would accommodate approximately 50-60 dwellings. Beyond the bypass, there is scope for public open space and extensive landscaping to visually mitigate the scheme, as described for Site B. We will forward on a pack of information which contains Drawing No. 3097.3001 dated June 2017, prepared by BHP Harwood Architects. This shows an initial design concept for Site B and C which illustrates the development areas and key routes into the sites and how they relate well to the existing town. It shows how much of the existing route of Pyrton Lane can become downgraded to a 'country lane' character and connect to a serious of footpath links to local amenities and facilities. This will benefit the existing residents of the Marlbrook estate as the access route ending in the reserved corridor for a bypass can now become a tranquil green lane taking people to the local schools. The mature vegetation currently on the outer edge of the Marlbrook Estate will remain as a visual buffer to the new development, but with a new footpath across it. Section 8.7 Pyrton Neighbourhood Development Plan (Page 42) We welcome the recognition that PYR2 is able to contribute to the re-alignment of the B4009 and that their development would relate to the settlement of Watlington. However, clearly it must be additional to the allocated growth within the Watlington Neighbourhood Plan. We also wish to point out that the 2015 SODC Landscape Capacity Assessment for sites on the edge of larger villages in South Oxfordshire (additional villages) - "Kirkham" report - screened out PRY2 in the first stage of its assessment, based wrongly on the whole site being developed. There was no subsequent stage 2 assessment of the scheme and, had there been, then a reduced number and scope for landscape and visual mitigation would have been taken into account. Furthermore, now that the District Council is proposing that a bypass runs across PYR2 then this is a fundamental new piece of information that needs to be included within any landscape assessment. This report therefore has limited weight in relation to the current situation.

#### SC17 RESIDENT COMMENT

in this instance, I feel that it is imperative that the Watlington Parish Council understand just how vehemently opposed I am to the proposed Watlington bypass. The bypass would have such a negative impact on the environs of Pyrton village with no demonstrable benefit to Watlington. The WDNP suggestion that the bypass and the inevitable housing that would follow on Pyrton Parish land should then be used to enrich Watlington is beyond the pale!

I will not restate all of the excellent reasons/evidence as they have been so well articulated in the response submitted by Pyrton Parish Council

#### SC18 SPORT ENGLAND

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.

http://www.sportengland.org/playingfieldspolicy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

http://www.sportengland.org/planningtoolsandguidance

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/design-and-cost-guidance/des

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a>

PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a>

Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team Planning.south@sportengland.org

#### SC19 SOUTH OXFORDHIRE DISTRICT COUNCIL

See separate document.

#### SC20 ENVIRONMENT AGENCY

Our ref: WA/2006/000324/PO-03/SB1-L01

Date: 25 May 2017

Dear Sir/Madam,

Watlington Neighbourhood Development Plan – Submission

Thank you for consulting us with the Neighbourhood Plan for Watlington. We aim to reduce flood risk, while protecting and enhancing the water environment.

Together with Natural England, English Heritage and the Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into neighbourhood plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http:/cdn.environmentagency.gov.uk/LIT\_6524\_7da381.pdf.

We have concerns with the proposed allocation – "Site A" – that need to be addressed so that we do not find the Neighbourhood Plan 'unsound'. Other than this matter, we are supportive of the environmental aspects of the Neighbourhood Plan.

Site Allocation 'A'

We note that one of the proposed site allocations in the Plan ('Site A') contains areas of Flood Zones 2 and 3 and is bordered by the Chalgrove Brook. However, we cannot see that details of the flood risk Sequential Test have been provided, nor that a 'Level 2' Strategic Flood Risk Assessment (SFRA) has been undertaken for the site. We would expect both of these to be completed for this site to be allocated in the Plan. This is in accordance with the National Planning Policy Framework (NPPF) paragraphs 100-102 and Planning Practice Guidance: https://www.gov.uk/guidance/flood-risk-and-coastal-change#Sequential-Test-to-Local-Plan.

The Sequential Test should be informed by South Oxfordshire District Council's (SODC) Level 1 SFRA.

It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.

SODC and Oxfordshire County Council (as the Lead Local Flood Authority) will be able to advise if there are areas at risk from other sources of flood risk (including groundwater, surface water and sewerage flood risk) in the Neighbourhood Plan area. Any relevant Surface Water Management Plan will contain recommendations and actions about how

End 2

such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites.

Whilst we appreciate that you have undertaken an assessment of sites in the Environmental Report, which includes consideration of flood risk, we do not consider this to be a Sequential Test report. However, we do believe that the work you have undertaken for the Environmental Report could be used for the Sequential Test. The main difference being that the Sequential Test report will only give consideration to flood risk issues.

We would like to say at this point however that we are very supportive of the intention to only locate 'green spaces' in the areas of Flood Zones on the site (the 'sequential approach': https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach) and to "conserve and enhance" the Chalgrove Brook chalk stream.

If you would like further advice on completing a Sequential Test and Level 2 SFRA, please contact us.

Policy 3

We are very supportive of your Policy 3. However, we suggest that the following is added to the end of part 3b) (additions in bold): "...from The Environment Agency and/or Oxfordshire County Council as the Lead Local Flood Authority". We think this is sensible to include because the Environment Agency are only responsible for the Chalgrove Brook; ponds and other watercourses are generally maintained or managed by the Lead Local Flood Authority.

If you have any queries about this response, please do not hesitate to contact me.

Yours faithfully,

Clark Gordon

Sustainable Places Planning Specialist

Direct dial 0203 025 8998

E-mail planning THM@environment-agency.gov.uk

cc Planning Policy - South Oxfordshire DC

#### SC21 NATURAL ENGLAND

FAO: Rachel Gill,

Dear Ms Gill,

Many thanks for consulting Natural England regarding this pre submission version of the Watlington Neighbourhood Plan and apologies for the delay in getting our response back to you.

Given our previous comments regarding the Sustainability Appraisal (SA) Scoping and having taken a look through this I won't need to make any further comments regarding the final SA report at this time. The proposals put forward within the pre-submission Plan itself, with the proposed B4009 relief road, do contain the allocations for development to the north east of Watlington however these will require further assessment including air quality and landscape impact in order to plan new development in such a way as to cancel out landscape and air quality impacts from vehicles on the new road.

Given the distance (just over 1.5km) to the nearest Site of Special Scientific Interest (SSSI) – Watlington and Pyrton Hills SSSI, there isn't likely to be a direct impact from new development however ensuring high quality on site Green Infrastructure (GI) will mean new residents won't be as likely to head up to the hills into the designated site where possible secondary impacts can occur through recreational pressure. Ensuring planting along any new roads is maximised in order to absorb as much air pollution at source as possible will also help to ensure no wider impacts on the Chilterns Beechwoods Special Area of Conservation (SAC) which has component sites 2.2km to the north east at Aston Rowant.

The policies set out in the plan under section 3a-3f are a positive step and will if implemented fully ensure there is a gain in biodiversity provision going forward for the new development proposed on the three allocated sites. This should ensure that green chains and connectivity is maximised wherever possible with areas surrounding the new development and also provision within it for local residents to use as well as for biodiversity gains through provision of wildflower planting and the like. The AONB views need to be protected and landscape should be taken into account thoroughly when considering the design of any new development proposed within the allocated sites in order to design it into the environment and to use local materials to ensure it blends in as much as possible which would be following the Chilterns Building Design Guide.

Regards,

Piotr Behnke Adviser Sustainable Development Thames Team

Natural England, Area 3A Nobel House, 17 Smith Square, London SW1P 3JR