

Response 1

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation
Submitted on 2025-06-12 12:42:03

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Organisation (if relevant):

Thames Water

Organisation representing (if relevant):

Thames Water

Address line 1:

1st Floor West

Address line 2:

Clearwater Court

Address line 3:

Vastern Road

Postal town:

Reading

Post code:

RG1 8DB

Telephone number:

[REDACTED]

Email:

[REDACTED]@thameswater.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

[REDACTED]

[REDACTED]

Property Town Planner

[REDACTED]

[REDACTED]@thameswater.co.uk

1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

You can upload supporting evidence here:
25.06.05 Chalgrove NP Reg 16 issued.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]:



E: [REDACTED]@thamewater.co.uk

M: [REDACTED]

Issued via email:
planning.policy@southandvale.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

05 June 2025

South Oxfordshire District – Chalgrove Revised Neighbourhood Plan Submission Draft - Regulation 16 Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the South Oxfordshire District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Policy Omission - Water Supply and Wastewater/Sewerage Infrastructure

The introduction sets out that: *“It is important when planning new developments that the cumulative environmental impacts are considered, in particular their effect on the overall capacity of local services and infrastructure to ensure that sufficient water/sewerage/transport/health facilities will be available in a timely manner.”* But there is no policy covering this important topic.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2024, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) 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).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Water Efficiency

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

In light of the above, we consider that the Neighbourhood Plan should include the following policy:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Specific Sewerage/Wastewater Infrastructure Comments

- **Drainage Ditches & Watercourses** – It is the responsibility of riparian landowners to maintain the watercourse and to clear any obstructions (natural or otherwise) so the normal flow of water is not impeded. Ensure natural flow from your upstream neighbour can transfer downstream without obstruction, pollution or diversion. A water course can be a natural or artificial channel, such as a river, stream, ditch or culvert (an underground covered channel or pipe).
- **Highway Drainage** - Highway drains are designed to: remove surface water run-off from the highway to help keep roads safe and minimise problems; prevent damage and make roads last longer through effective drainage, whilst minimising surface water from the highway affecting properties or land. It is the responsibility of the local authority that these drains are clear of obstruction and are routinely cleaned and maintained.
- **Sewer Network** - The sewer network we operate today has been much improved over the years. However, it remains under increasing pressure and is sometimes overwhelmed. Several factors increase the risk of sewer flooding in both our urban and rural catchments. These include increasing periods of prolonged and heavy rainfall, population growth, fewer green areas and changes in agricultural land practices.

Our sewer network is not designed to be completely watertight, but with high and prolonged water tables evident within our catchments groundwater infiltration into our networks occur. Our sewers are only designed to take water from toilets, sinks, baths and showers along with human waste and toilet tissue. Everything else should be put in the bin.

Blockages are often caused by:

- Fat, oil and food scraps that become solid in pipes.
- Wet wipes – even the ones labelled ‘flushable’ block your pipes.
- Wet wipes – even the ones labelled ‘flushable’ block your pipes.
 - Further information on our ‘Bin it, Don’t Block It’ campaign can be found here <https://www.thameswater.co.uk/help/water-and-waste-help/blockages/bin-it>

We request that if a customer thinks that they have a blockage on a section of pipework that's our responsibility, please report it to us. We'll send someone to look at it as soon as we can. If we find a blockage and it's in a section of pipework that's their responsibility, our engineers will discuss this with them.

In addition, we request that if a customer has spotted a drain that's leaking sewage and endangering wildlife or the environment, please report the problem to us.

[Thames Water - Report a problem - View and report problems](#)

- **Planning Application Process** – We work closely with developers and planning authorities across our region to ensure water and sewerage infrastructure can support growth, and where upgrades are needed to accommodate new developments, they will happen. We look at each development case by case and where needed will request conditions are added to planning applications, so for example, new homes are not occupied until the necessary upgrades to our infrastructure have taken place. Thames Water are not statutory consultees on planning applications, but can offer advice on how new developments would affect the local infrastructure

Our specialist team look at each planning application individually as there may well be things we can do to improve the situation to the point where we do not need to raise an objection. Where needed we will request conditions are added to planning applications and where the Council have concerns, we are always willing to review and discuss any advice we have given. We may seek the attachment of a condition but its ultimately the decision of the planning authority / planning appeal officer to determine if it should be attached to the planning approval.

In accordance with the Building Act 2000 clause H3.3. Positive connection to a public surface water sewer will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being - 1st Soakaways; 2nd Watercourses; 3rd Sewer. Where disposal of surface water is other than to a public sewer, then the applicant shall ensure that approval for the discharge has been obtained from the appropriate authorities.

Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

Development Sites

There is only one allocation in the neighbourhood plan – Land west of Marley Lane, however, it is understood that the site already has planning approval and is half completed. Thames Water were not consulted on either the Outline nor Reserved Matters so no comment was made. However an assessment has been carried out which shows no detriment to the sewer network from this development.

Clean Water is covered by an Inset agreement and the water provide is Icosa Water Services Ltd. Thames Water are the waste providers.

Chalgrove Sewage Treatment Works is currently in the planning phase for an upgrade in AMP 8 (2025-2030).

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link:
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,

[REDACTED]
Thames Water Property Town Planner

Response 2

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation
Submitted on 2025-06-12 12:45:45

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Planner

Organisation (if relevant):

Avison Young

Organisation representing (if relevant):

National Gas

Address line 1:

Central Square

Address line 2:

Forth Street

Address line 3:

Postal town:

Newcastle upon Tyne

Post code:

NE1 3PJ

Telephone number:

[REDACTED]

Email:

nationalgas.uk@avisonyoung.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Gas.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgas.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards

[REDACTED]

[REDACTED]

Planner

Mobile

[REDACTED]

[REDACTED]@avisonyoung.com | avisonyoung.com

You can upload supporting evidence here:

06-06 National Gas.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]:



Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/ 15B901605

06 June 2025

South Oxfordshire District Council
planning.policy@southandvale.gov.uk
via email only

Dear Sir / Madam

Chalgrove Neighbourhood Plan Review

April – June 2025

Representations on behalf of National Gas Transmission

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

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

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:





[REDACTED] Director

nationalgas.uk@avisonyoung.com

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

[REDACTED], Asset Protection Lead

[\[REDACTED\]@nationalgas.com](mailto:[REDACTED]@nationalgas.com)

National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[REDACTED]

[REDACTED]

Director

0191 269 0094

[REDACTED]@avisonyoung.com

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Response 3

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation
Submitted on 2025-06-12 13:04:41

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Officer

Organisation (if relevant):

Natural England

Organisation representing (if relevant):

Natural England

Address line 1:

County Hall

Address line 2:

Spetchley Road

Address line 3:

Postal town:

Worcester

Post code:

WR5 2NP

Telephone number:

03000603900

Email:

consultations@naturalengland.org.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please find Natural England's response in relation to the above mentioned consultation attached.

Kind regards,

[REDACTED]

Officer

Natural England

County Hall

Spetchley Road

Worcester

WR5 2NP

Tel 0300 0603900

mail to: consultations@naturalengland.org.uk
www.gov.uk/natural-england

You can upload supporting evidence here:
510907 NE Response.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:
No file uploaded

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[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Date: 10 June 2025
Our ref: 510907
Your ref: Chalgrove Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Neighbourhood Planning Team
South Oxfordshire District Council

BY EMAIL ONLY

planning.policy@southandvale.gov.uk

Dear Sir/Madam

Chalgrove Neighbourhood Plan Review - Pre-submission Regulation 14 Consultation

Thank you for your consultation on the above dated 28 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully


Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

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

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Response 4

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation
Submitted on 2025-06-12 12:55:53

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Senior Planner

Organisation (if relevant):

Walsingham Planning

Organisation representing (if relevant):

Nicholas King Homes

Address line 1:

Bourne House

Address line 2:

Cores End Road

Address line 3:

Postal town:

Bourne End

Post code:

SL8 5AR

Telephone number:

[REDACTED]

Email:

[REDACTED]@walsingplan.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Good morning,

Please find attached representations to the Chalgrove Neighbourhood Plan Review Consultation on behalf of my client Nicholas King Homes.

Please can you confirm receipt of the attached.

Many thanks,

[REDACTED]

[REDACTED]

Senior Planner

Bourne House, Cores End Road, Bourne End, Bucks, SL8 5AR

T: 01628 532244 M: [REDACTED]

www.walsinghamplanning.co.uk

You can upload supporting evidence here:

4 Nicholas King Homes.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

Our Ref: MW/B0127/23

10 June 2025

Planning Policy
South Oxfordshire District Council
Abbey House
Abbey Close
Abingdon
OX14 3JE

via email

Dear Sir/Madam,

RE: Chalgrove Neighbourhood Development Plan Review Consultation

I am writing on behalf of my client, Nicholas King Homes, in response to the Chalgrove Neighbourhood Plan (CNDP) Review Consultation. This letter provides comments on the consultation Neighbourhood Plan Review and associated documents. My client controls land within and adjoining Chalgrove, which is suitable and available now to deliver proportionate growth to the village.

The Chalgrove Neighbourhood Development Plan was adopted in December 2018. The Modification Statement published with this consultation (dated December 2023) sets out the modifications to the CNDP that are sought as part of this review. It concludes that the main changes relate to the inclusion of the Chalgrove Design Guidance and Codes, and minor changes to the text of the CNDP to reflect the status of the Neighbourhood Plan and the Adopted South Oxfordshire Local Plan 2035. The modification statement states that only the wording of Policy C2 (Design and Character) has been updated to make reference to the new Design Guidance and Codes Document and requires all development to comply with this. The Statement then states that no changes are proposed to the wording of other policies within the Plan, nor any other core documents, supporting documents or appendices. This is incorrect. The CNDP review does include changes to the wording of other policies within the Plan, which is expanded on below.

Policy H1- Housing Site Allocation

Firstly, the consultation document includes the removal of Policy H1 B in its entirety, which comprises an allocation at Land to the East of Chalgrove, for 120 dwellings within the made Neighbourhood Plan. It is assumed that this has been removed because this development is complete and is therefore no longer an allocation or future commitment. The Plan does not explicitly state why Policy H1 B has



been removed but it is the correct approach as this site has full planning permission, and it is our understanding that this has been constructed in full.

We also consider this to be the case for the site allocated in Policy H1 A, Land West of Marley Lane, which is proposed to be retained. Policy H1 (Housing Site Allocation) of the Plan still allocates Land West of Marley Lane for 200 dwellings. Planning permission has already been granted for this development, with the reserved matters planning permission being granted in May 2021 (P20/S1262/RM), and construction work is well underway on the development. South Oxfordshire District Council's 5 Year Housing Land Supply Position Statement (dated January 2025) sets out that, as of 31st March 2021, 87 homes had been completed on site, with 54 predicted for completion in 2024/25, 54 predicted for completion in 2025/26 and the final 5 for completion in 2026/27. As such, it is expected that the development will be completed in its entirety within the next 2 years.

Policy H1A allocates Land West of Marley Road and sets out a number of site-specific requirements, some of which are new and have been added through this review process and differ from the made Neighbourhood Plan. Given the site is under construction and planning permission has been granted, we do not understand the reasoning behind these additional requirements. Furthermore, the status of this policy has not been updated and still refers to the site as an allocation. This is not the case. This site is no longer an allocation, but a commitment that has planning permission, has been implemented and is clearly going to be completed. This should therefore no longer form part of the development plan and should be removed as part of this review.

A similar issue has also recently been raised by interested parties as part of the Wallingford Neighbourhood Plan Review process, where Judicial Review proceedings have been instigated challenging the lawfulness of that Neighbourhood Plan Review. The claim, which has been accepted by the Courts and will be going to full hearing, challenges the lawfulness on a number of grounds, one of which includes its handling of historic housing allocations, specifically the inclusion of sites which benefit from planning permission, and are being built out, as allocations within the Neighbourhood Plan review for the purposes of national planning policy protections.

We therefore strongly suggest that Policy H1 is removed in its entirety, as both sites referred to in the existing plan are now commitments, not allocations.

Policy C1 – Development within the built-up area

We also disagree with the wording of Policy C1 (Development within the built-up area). It should be noted that the review does propose some minor changes to the wording of this policy relating to appropriate development outside the built-up area (again these are incorrectly omitted from the modification statement). The review proposes to remove the following as appropriate development: 'Reuse of existing buildings in the countryside; Diversification of agricultural and other land-based rural businesses and operational development necessary for existing businesses so long as the development does not encroach on open countryside'. Proposals for residential development outside the built-up area of Chalgrove, will only be supported if it is necessary or suitable for a countryside location and is consistent with development plan policies'. Therefore, this is no longer consistent with the Local Plan



2035 or the National Planning Policy Framework (NPPF) which sets out appropriate development outside of built-up settlements, as this wording is proposed to be removed.

We also feel both the existing adopted policy and proposed policy are overly restrictive in terms of defining the built-up area and believe this policy does not allow for sustainable developments to come forward within the Neighbourhood Area. The justification set out within the plan states that it is important to maintain and/or enhance the form of the village and ensure that new development does not compromise this. It states the aim is to encourage small scale development that does not extend development into the open countryside in a manner or form that will compromise the setting of the village.

Chalgrove is identified as a larger village in the Settlement Hierarchy set out in the South Oxfordshire Local Plan 2035 and therefore it is a sustainable location for proportionate growth. However, with the existing wording of Policy C1, there is very little scope for additional small-scale development to be delivered as it excludes almost all undeveloped land within or adjoining the village, and also some developed land which could be redeveloped. We appreciate that there is a strategic allocation within the Local Plan at Chalgrove Airfield, however this should not restrict or place a cap on further sustainable development coming forward within the area, and as it stands, there is very little opportunity for this given the overly restrictive wording of this policy. There is currently no live planning application in respect of Chalgrove Airfield which even if granted will take a long time to deliver new housing (given the amount of infrastructure required). Developing small sites within Chalgrove would ensure a steady supply of much needed new housing is delivered as well as enhancing the vitality of existing services, etc.

My client controls a parcel of land, that is very well related to the village, on the edge of the built-up area, however at present, the lawful use of this land is a mix of residential and agricultural. The redevelopment of this site for a modest residential development would enhance the character and appearance of this part of the village, would not extend development into the open countryside and would make best use of land (as large parts of the site are redundant), however at present, this would not be supported by Policy C1. This is therefore contrary to the NPPF and Local Plan 2035 which supports sustainable development.

Policy C2 – Design and Character

The review seeks to introduce a new Core Document, the Design Guidance and Codes Document, which sets out design guidance for applicants preparing proposals in the area, and to South Oxfordshire District Council when considering applications. The review seeks to include reference to this within Policy C2, requiring all developments to adhere to this.

The first part of the document comprises a Character Area Study and splits the Neighbourhood Area into 13 different Character Areas. Each Character Area is then assessed/described on its layout, heights, buildings, streets, spaces and water and protected views. Other than a description of these 'protected views', there is no further information on how these have been determined or justified, or



the specifics of these. No detailed character studies have been produced that support these 'protected views'.

For example, CA13: Mill Lane states:

'Views across the fields to the Church Tower are valued, as well as the longer view to the East towards the Chilterns escarpment. The lower part of Berrick Road also shares this long view. Protected views from this area are the views of the St. Mary's Church, Chalgrove Manor, The Mill, and the open fields towards Hare's Leap to the South West.'

It is not clear whether these views are those referred to in the made Neighbourhood Plan at Map 2 as 'Chalgrove Village Views', or if this document is proposing to introduce new views. Other than the description within the Design Guide, there is no map or figure denoting these views, and it is unclear. Either way, it appears the Design Guide seeks to go one step further and designate these as 'protected views' without the justification or evidence of why these should be protected.

The document then goes on to provide guidance and codes to promote good design in Chalgrove, referring directly back to the Character Areas. Elements of this are not objected to, however it does seem to introduce additional restrictions above Local Plan requirements and considerations that should be site-specific. For example, the requirements for new development within certain areas to be raised (relating to flooding) and the requirement for permitted development rights to be removed for garages, to name a few. These matters should be considered on a site-specific basis by the decision maker as they are subject to further assessment on the merits of a planning application. It is not appropriate for aspects of this document to be imposed by a generic design guidance document.

In light of the above, we raise serious concerns regarding policies within the submitted Chalgrove Neighbourhood Plan Review Consultation, specifically policies H1, C1 and C2. We strongly feel that Policy H1 should be removed in its entirety, as the Neighbourhood Plan no longer contains any proposed housing allocations. Land West of Marley Lane is very clearly a committed development, that is well under construction. We believe that new sites for development should be allocated as part of any update to the neighbourhood plan. We also feel the wording of Policy C1 is contrary to the NPPF and Local Plan as well as being overly restrictive in terms of the delivery of new development and not allowing sustainable development sites to come forward. A number of the matters within the Design Guidance and Code Document are too specific and should instead be considered on a site-by-site basis by the decision maker.

We would be happy to discuss the above further with either Chalgrove Parish Council or South Oxfordshire District Council in due course.

Yours faithfully,





Senior Planner

@walsingplan.co.uk



Response 5

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation

Submitted on 2025-06-12 13:08:33

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Associate Director

Organisation (if relevant):

Nexus Planning

Organisation representing (if relevant):

Catesby Estates

Address line 1:

3rd Floor

Address line 2:

Suite 2 Apex Plaza

Address line 3:

3 Forbury Road

Postal town:

Reading

Post code:

RG1 1AX

Telephone number:

[REDACTED]

Email:

[REDACTED]@nexusplanning.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

I attach representations to the Chalgrove Neighbourhood Plan on behalf of Catesby Estates.

We would appreciate if you could please confirm receipt of this email and that the comments will be taken into account.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

Associate Director

M [REDACTED]

E [REDACTED]@nexusplanning.co.uk

You can upload supporting evidence here:

Catesby - Reps. to Chalgrove Neighbourhood Plan Consultation_100625.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Planning Policy
South Oxfordshire District Council
Planning.policy@southoxfordshire.gov.uk [BY EMAIL ONLY]

Reading
3rd Floor, Suite 2
Apex Plaza
3 Forbury Road
Reading RG1 1AX
nexusplanning.co.uk

10 June 2025

Our Ref: 40291a

Dear Sir / Madam

Chalgrove Neighbourhood Plan Review – Regulation 16 Consultation

Nexus Planning has prepared these representations on behalf of Catesby Estates in response to the Chalgrove Neighbourhood Plan Review ('CNPR') Consultation (May – July 2025), undertaken by South Oxfordshire District Council ('SODC') pursuant to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

Scope of Representations

These representations are made in the context of Catesby's ongoing promotion of the Land at West Chalgrove for residential development, over which Catesby holds a specific land interest. These representations address topics within the CNPR consultation, and its supporting evidence base, accordingly.

Our comments relate to the extent to which the proposed CNPR meets the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. Our comments also highlight where opportunities exist that we believe would enhance the clarity of the Plan and facilitate its implementation as an effective development management tool.

Accordingly, these representations address the following matters:

- Regard to National Policy
- Clarity of the Consultation

Regard to National Policy

Overview

Planning Practice Guidance ('PPG') provides that Neighbourhood Plans represent a mechanism that allows local people to plan for the types of development that will meet their community's needs. PPG is also clear that Neighbourhood Plans must align with the strategic needs and priorities of the wider local area (as defined through adopted and emerging Local Plans, and the associated evidence base).

Basic Conditions

Once submitted for independent examination, under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'), it must be demonstrated that the Neighbourhood Plan conforms to the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 ('TCPA'). The Plan must also be legally compliant in every other respect.

Following submission, it is the role of an Independent Examiner to consider whether the draft Neighbourhood Plan meets the basic conditions. In order to meet the basic conditions, the making (adoption) of the Neighbourhood Plan must (in summary):

- be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan; and
- not breach, and must be otherwise compatible, with international obligations.

A Neighbourhood Plan must have regard to the National Planning Policy Framework ('NPPF') (December 2024) and associated guidance. In this respect, NPPF Paragraph 13 states that:

'The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should:

- *Support the delivery of strategic policies contained in local plans or spatial development strategies; and,*
- *Should shape and direct development that is outside of these strategic policies'*

NPPF Paragraph 29 further reiterates the need for Neighbourhood Plans to be aligned with the strategic needs and priorities of the wider local area. It states that: *'...Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies'*. This is supported by NPPF footnote 16 which states: *'Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area'*.

It is clear from the Modifications Statement, which sets out what is proposed for change in the review and accompanies the CNPR as part of the consultation documentation, that account has not been taken of the NPPF. The Modifications Statement pre-dates the NPPF, having been produced in December 2023, and therefore makes no reference to the NPPF only its superseded version.

The NPPF provides for significant changes specifically with regard to the need for and provision of housing – the revised standard method calculation increases local housing need for South Oxfordshire from 579 dwellings per annum to 1,242 dwellings per annum – and this policy intent has not been accounted for, or even acknowledged.

In addition, Neighbourhood Plans are also required to provide sufficient clarity to enable their policies to fulfil their intended development management role. Moreover, such policies must relate specifically to the unique circumstances of the neighbourhood area. This means that Neighbourhood Plan policies should not duplicate general Local Plan policies. This is set out in PPG, wherein:

'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It

should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared’.¹

Specifically in relation to policies that are relevant to housing supply, the PPG is clear that:

‘Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need’²

The NPPF plans for a significant uplift in the delivery of housing in order to meet needs, and the local housing needs within South Oxfordshire and across Oxfordshire as a whole are particularly acute, as highlighted by the revised local housing needs calculations from December 2024. However, rather than stay silent on the need for and provision of housing and let the Strategic Plans address needs, which is what the CNPR chooses to do with regard to the economic development needs – the adopted Local Plan provides for new employment land at Monument Business Park, Chalgrove which has been carried forward in to the Submission Joint Local Plan – the CNPR instead seeks to stifle the potential for further housing development in Chalgrove for a further 5 year period, by seeking to meet the requirements of Paragraph 14 b) of the NPPF, that *“the neighbourhood plan contains policies and allocations to meet its identified housing requirement”*.

In reality, the CNPR has not taken account of the latest evidence of housing need. The Consultation Statement that accompanies the CNPR confirms that in 2021 there was an “Identification of Needs” exercise. It is not clear what this entailed, but from the work streams that followed, the outcome appears to have related purely to the need for a Design Code.

Instead, the CNPR simply carries forward and retains its previous policy and allocation in an attempt to show that the policies and allocations with regard to housing need have been provided for. The CNPR, whilst omitting one housing allocation, retains the other. The reality is that both sites that were allocated in the Chalgrove Neighbourhood Plan are complete, in the case of Land east of Chalgrove (Policy H1B) – this site has actually been omitted – or are at the advanced stage of construction in the case of Land to the West of Marley Lane (Policy H1A).

The need for the inclusion of Site H1A was previously questioned in the Examination Report to the made CNP. The Report states on page 15 that the Examiner had *“had previously questioned, now that planning permission had been granted for the Land West of Marley Lane, whether the neighbourhood plan still needed to be allocating it for development. Both the Parish Council and the District Council saw that there was a value in maintaining the allocation in the plan, notwithstanding it had now become a commitment. Not only does having an allocation cover the unlikely situation whereby the permission was not to be implemented, but it could also be relevant for the consideration of reserved matters.”*

If at that time the need for the allocation was being questioned when the site was committed via an outline planning approval and only retained to cover non-implementation or reserved matters details, the fact that the site is substantially constructed and confirmed by the developer, Ridgepoint Homes, as being fully sold, the policy serves no purpose, is ambiguous as to the provision of housing (contrary to Para. 041 of the PPG), and is unjustified.

¹ Planning Practice Guidance. Paragraph: 041; Reference ID: 41-041-20140306

² Planning Practice Guidance. Paragraph 040 Reference ID: 41-040-20160211.

Policy H1 and Policy H1A serve no purpose in the CNPR, therefore, other than to potentially reengage the provisions of Paragraph 14 of the NPPF for an extended period, which would be detrimental to the achievement of sustainable development in South Oxfordshire, namely the delivery of otherwise sustainable housing schemes to meet up to date assessments of housing need.

As such, the policies should be removed from the CNPR as they fail to comply with national policies and guidance.

Clarity of Consultation Practice

South Oxfordshire District Council ('SODC') is undertaking a consultation on a Neighbourhood Plan modification proposal. However, the CNPR consultation document does not clearly indicate where the proposed modifications are being made, with respect to the currently made Chalgrove Neighbourhood Plan. Whilst a 'Modifications Statement' has been provided, which summarises the areas in which changes have been made, it is considered out of date and inaccurate as to the changes that have actually occurred in the CNPR.

As previously indicated, it was produced in December 2023 (and even quoting that the latest revision to the NPPF was dated 5 September 2023) and therefore pre-dates the NPPF which was published in December 2024, evidence that the CNPR has not considered national policy.

In addition, whilst the Modification Statement states that the main change is in relation to Policy C2 which has been updated to refer to the new Design Guidance and Codes document, it states in the list of policies that no other policies have been changed. This is factually incorrect. Whilst we have not cross-referenced every policy and supporting text within the CNPR with that of the CNP, it is apparent that there have also been changes which have not been set out in the Modification Statement with regard to Policy H1, Policy H1A and Policy H1B, and their supporting text for the provision of housing, as follows:

- Policy H1: Housing Site Allocation – reference to Option B Land to the East of Chalgrove for up to 120 dwellings has been omitted, together with the Map 1a which outlines the site.
- Omission of text in relation to Land East of Chalgrove from the Justification text to Policy H1.
- Policy H1A: Land to the west of Marley Lane – amendments to the wording of the following specific requirements:
 - Insertion of a new a) requirement stating site size and scale of development. All other requirements are then re-labelled according, a) becomes the new b), becomes the new c) and so on.
 - Insertion of more specific and onerous requirement/obligation for f) (was e)) in relation the Scout Hut with the "ownership and maintenance to be agreed with the Scout Group."
 - Insertion of more specific and onerous requirement/obligation for h) (was g)) in relation to the maintenance of all public open spaces and the requirement for *"two people to represent Chalgrove on the Board of the Company, one resident and one member of the Chalgrove Parish Council."*
- Policy H1B: Land to the East of Chalgrove – this policy has been omitted in its entirety together with the supporting plan.

There is no doubt that the omission of reference to Land east of Chalgrove both in Policy H1 and the separate Policy H1B which specifically address the site is as a result of the completion of the development, but it should be made clear in the Modifications Statement that Policy H1 and its supporting justification text, together with Policy H1B have been omitted.

With regard to the insertions in to Policy H1A, the reasoning for this is unclear; it has not been set out anywhere as to the justification for this. This is particularly the case when the development itself has planning permission and is at the advanced stages of construction. As previously indicated, it is considered that this policy should be omitted on the basis that the development is under construction, but at the very least, it should not be seeking to add further requirements and obligations.

This is particularly the case when the Examination Report to the CNP expressly sought, at page 15, for these additional requirements be deleted on the basis that *"It is not appropriate for a planning policy which governs the use and development of land to impose requirements on the constitution of maintenance company as required by criterion h)– it would not be possible to refuse a planning application on the grounds that the relevant level of representation was not provided. That is a matter for negotiation. Equally the policy cannot require that "ownership and maintenance to be agreed with the Scout Group" as that could give the Scout Group an effective veto over the whole development - that would be a matter that would need to be negotiated into the Section 106 agreement with possibly a dispute resolution mechanism introduced in case there were to be a failure to agree."* Legal agreements associated with the development of Land west of Marley Lane will have been completed in order for the development to commence.

Again, the Modifications Statement should be clear and reflective of the changes that have actually been proposed for the CNPR and the reasoning for it.

To rectify this issue, further consultation should be undertaken on the basis of a document which clearly indicates the precise changes that have been made as part of the proposal to modify the Plan.

Summary

Several flaws and conflicts presented within the CNPR, as currently proposed, have been set out in our representations, which individually and together mean that the plan fails to meet the basic conditions as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 . These concerns relate to:

- The fact no account has been taken of the latest version of the NPPF (December 2024) which seeks to significantly boost the delivery of housing.
- It seeks to ambiguously retain the housing allocation H1A: Land west of Marley Lane, which has largely been completed, in order to benefit from the provisions of Paragraph 14 for an extended period.
- The clarity of the consultation practice – the Modifications Statement is considered out of date with the CNPR and is inaccurate as to the changes that have been included in the CNPR.

We trust that our comments are of assistance to the Council and the Independent Examiner undertaking the examination of the Neighbourhood Plan.

Yours faithfully

[Redacted Signature]

[Redacted Name]

Associate Director

E: [Redacted Email]@nexusplanning.co.uk

London

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Reading

Response 6

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation

Submitted on 2025-06-12 13:12:16

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Planning Policy Officer (Neighbourhood)

Organisation (if relevant):

Organisation representing (if relevant):

South Oxfordshire District Council

Address line 1:

Abbey House

Address line 2:

Abbey Close

Address line 3:

Postal town:

Abingdon

Post code:

OX14 3JE

Telephone number:

01235422600

Email:

[REDACTED]@southandvale.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

11.06.25.Chalgrove Review NDP Reg 16 DC Comments.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.



Policy and Programmes

HEAD OF SERVICE: TIM ORUYE



Listening Learning Leading

Contact officer: [REDACTED]

[REDACTED]@southandvale.gov.uk

Tel: 01235 422600

05 June 2025

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

South Oxfordshire District Council has worked to support Chalgrove Parish Council in the preparation of their Neighbourhood Plan and compliments them on a thoughtful, comprehensive and well-produced plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the Chalgrove Neighbourhood Development Plan (NDP) Review during the pre-submission consultation.

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

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

Yours faithfully

[REDACTED]

[REDACTED]

Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1	Neighbourhood Plan Comments	Where changes to the policy or supporting text are recommended new text is shown in bold and deleted text is shown as strikethrough .
2	General comment	<p>On Wednesday 22nd November 2023 all designated Areas of Outstanding Natural Beauty (AONBs) in England and Wales became National Landscapes. The new name reflects their national importance; the vital contribution they make to protect the nation from the threats of climate change, nature depletion and the wellbeing crisis, whilst also creating greater understanding and awareness for the work that they do. We recommend that the references to AONBs throughout the plan and supporting document are amended to National Landscapes to reflect the change.</p> <p>This recommendation will apply to the following sections:</p> <p>Page 17- Policy C2- Design and Character bullet point j 'AONB' amend to 'National Landscape'</p> <p>Page 19 – 'Chilterns AONB' amend to Chilterns National Landscape</p>
3	General comment	<p>The Plan refers to previous SODC Core Strategy document which has been replaced by the Adopted South Oxfordshire Local Plan.</p> <p>This recommendation will apply to the following pages: 5,19,22,28, 31.</p> <p>The plan also references to the previous South Oxfordshire Design Guide on page 19 which has now been replaced with the Joint Design Guide 2022 and therefore should also be amended.</p>
4	Page 17- Policy C2- Design and Character	<p>Bullet point a) currently requires the following:</p> <p>'a) The form and scale of the buildings should reflect the neighbouring properties. Buildings should be a maximum of 2 storeys in height (based on a residential storey of 3 metres). The size of the roof should be proportional to the rest of the building and should not be designed disproportionately large in order to accommodate large amounts of additional living space.'</p> <p>Whilst the emerging Joint Local Plan is currently at examination and does not include the Chalgrove</p>

		<p>strategic allocation, the adopted South Oxfordshire Local Plan remains the relevant plan for the examination of the Chalgrove Neighbourhood Plan Review. The adopted Local Plan includes Policy STRAT7, which provides detailed guidance for development at Chalgrove Airfield. The height restrictions set out in Policy C2 (bullet point a) of the Neighbourhood Plan conflict with STRAT7, which seeks to deliver development at an appropriate density for the site and does not include specific height restrictions. We therefore recommend that the height requirement in Policy C2 should not apply to the Chalgrove Airfield site.</p> <p>We note that the Design Code includes an assessment of the character of Chalgrove Airfield, as detailed in CA18. However, this assessment does not take into account the strategic allocation at Chalgrove Airfield.</p> <p>We therefore recommend that the Design Code be amended to specify that it does not apply to the strategic allocation. This would align with the approach taken by the Examiner of the Wheatley Neighbourhood Plan, who concluded that, since the design code was not prepared with the strategic allocation in mind, nor in collaboration with its promoters, it should not apply to that allocation. The Wheatley Neighbourhood Plan Examiner's Report can be found here.</p>
5	Page 17- Policy C2- Design and Character	<p>Policy C2 Design and Character criteria h, we recommend adding 'and cycles' to the bullet point as follows:</p> <p>'Adequate storage space should be provided for bins and cycles and the design of the storage should not detract from the street scene.'</p>

6	Page 17- Policy C2- Design and Character	<p>The NPPF (Para 139a) states that development proposals should reflect ‘local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.’</p> <p>Bullet point J of Policy C2 identifies the following:</p> <p><i>‘j) All planning proposals should adhere to the Chalgrove Design Guidance and Codes document to ensure coherence with, and enhancement of, the character of the area’</i></p> <p>In order for the policy to be aligned with the NPPF it should require development to take ‘account’ of the design code produced whereas point j requires development to ‘adhere’ to the Chalgrove Design Guidance and Code’. We also recommend the policy makes reference to the district council’s Joint Design Guide. We therefore recommend the following changes:</p> <p>‘j) All planning proposals should adhere take account of the district council’s Joint Design Guide and adhere to the Chalgrove Design Guidance and Codes document to ensure coherence with, and enhancement of, the character of the area’</p>
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Ref.	Section/Policy	Comment/Recommendation
7	Page 26 paragraph 3	<p>Our Affordable Housing team provided the following comments at the pre submission consultation:</p> <p>Page 26, paragraph 3 suggests " The need for affordable smaller homes for local people. Enabling people to stay in the village either as first-time buyers or to downsize, a housing needs survey in 2012 assumed there is an affordable housing need from 37 respondents. All stated they have a local connection to Chalgrove and would be unable to afford to rent or buy on the open market or would have significant financial difficulties in doing so."</p> <p>It is noted that this data holds information from 2012, which may not give accurate reflection of the current needs and demands of affordable housing, as the overall picture has significantly changed since then. From looking at statistics, it is noted that 46 people have chosen Chalgrove as their area of 1st choice to live in. We recommend the references to the 2012 study are removed as this does not give an accurate picture of the current needs and demands of affordable housing, as the overall picture has significantly changed since 2012.</p>
8	Page 29- Policy H1A – Land to the west of Marley Lane	<p>The following text has been added to Policy H1A:</p> <p><i>a)The site consists of 19.7 hectares, of which approx 8.6 hectares of developable land in flood zone 1 is proposed for 200 dwellings (Map 4a overleaf).</i></p> <p>As written the bullet point reads more as supporting text. We would therefore recommend that the bullet point is removed from the policy wording and is reinserted within the supporting text with details of where the following information is located and can be found.</p> <p>Our Development Management Team identified at the Pre submission consultation that the site currently has a Section 106 agreement in place that includes all the detail of the transfer of the community building and the management company. The Section 106 agreement requires that the community building is handed over to the Parish</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>Council, and therefore it is up to the Parish Council to pass it on to the Scouts if that's what is needed. In addition, it may not be appropriate for the policy to define ownership and management arrangements. We therefore recommend bullet point f is amended as follows:</p> <p>f) Provide a community building to be used allocated as a Scout Hut and ownership and maintenance to be agreed with the Scout Group to include parking which can also be used by the allotment owners.</p> <p>The requirement for two people to represent Chalgrove on the Board of the Company, one resident and one member of the Chalgrove Parish Council, is outside of the scope of a neighbourhood plan and should not be included within the policy wording. Additionally, our Development Management Team highlighted that there is no mention of the Parish Council being on the board of the management company within the Section 106 agreement.</p> <p>We therefore recommend criterion h is deleted.</p>
Equalities Team comments:		
9	Page 13 Section 4.2 Objectives	<p>I am glad to see that there is the consideration of Disabilities and accessibility under the Street grid and layout section of the design proposal checklist, and that there has been engagement with groups that fall under protected characteristics, I would encourage that they are included in the main objectives of the plan under 4.2 of the plan, perhaps as a subset of the section Community Assets, Services and Facilities.</p> <p>We therefore recommend the inclusion of the following objective to address this:</p> <p>'11. To ensure community facilities are accessible and inclusive for all.'</p> <p>I would also encourage that consideration for play areas and Wayfinding are considered. It is recommended the following wording be added to Policy C2:</p>

		<p>‘All proposals should ensure that Accessibility and Inclusion are considered and government guidelines on accessible design are followed’</p> <p>The following resources could also be listed within the supporting text.</p> <p>Inclusive mobility guide</p> <p>Sports England - Accessible Play</p> <p>Make Space for Girls</p>
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Ecology Officer comments:		
10	General comment:	<p>The Design Code and NDP are limited on content related to ecology or biodiversity. The importance of the Chalgrove Brook is identified, though no specific policies appear to provide the watercourse any greater protection than the provisions of the adopted local plan. SF.03 makes mention of the brook and guide how SuDS should be designed and incorporated. Protection and enhancement of the Chalgrove Brook could be its own policy in the plan, requiring development to safeguard its ecological function and direct new habitat creation to support the watercourse. GF.01 and GF.02 of the Design Code is more specific and can be read as requiring developments to incorporate species enhancement features. This wording could be strengthened to specify a ratio of delivery, e.g. one enhancement feature per two new structures.</p>
Heritage Officer comments:		
11	General comment	<p>No particular heritage comments or concerns with the updated plan and new Design Code.</p> <p>The character area descriptions within the Design Code will be a useful tool to ensure quality and local distinctiveness of proposed development. It is recommended that policy wording and supporting text within the main plan makes clear references to the Design Code to ensure it is rooted within the plan evidence base.</p> <p>Following the advice from the heritage officer we</p>

		<p>recommend updating the section 'How the Chalgrove Neighbourhood Plan fits into the Planning System' on page 5 of the NDP. We have already recommended the inclusion of both the Joint Design Guide and the Chalgrove Design Code within policy wording as a separate comment.</p> <p>'The CNDP must be in general conformity with the strategic policies contained in the development plan for the area. South Oxfordshire District Council adopted the new current Local Plan 2035, on the 20th December 2020</p> <p>The development plan in South Oxfordshire includes:</p> <ul style="list-style-type: none"> • South Oxfordshire Core Strategy (2012) • South Oxfordshire Local Plan 2035 • Adopted neighbourhood plans
Landscape Officer comments:		
12	Page 10-Design Code-section 1.2.3	<p>The reference to the 2017 South Oxfordshire Landscape Character Assessment (also p13) is out of date, this has been replaced by the 2024 South Oxfordshire and Vale of White Horse Landscape Character Assessment. We therefore recommend updating the references to the most up to date landscape assessment on pages 10 and 13 with:</p> <p>'NHL04 Landscape Character Assessment for South Oxfordshire and Vale of White Horse September 2024.'</p> <p>On Page 13 we also recommend including a paragraph below the updated document reference as follows:</p> <p>2017—Landscape Character Assessment</p> <p>South Oxfordshire District Council</p> <p>This report comprises the Landscape Character Assessment for South Oxfordshire. It is a revision of the previous landscape assessment for South Oxfordshire (1998).</p> <p>NHL04 Landscape Character Assessment for</p>

		<p>South Oxfordshire and Vale of White Horse September 2024</p> <p>This report comprises the Landscape Character Assessment for South Oxfordshire and Vale of White Horse. It is a revision of the previous landscape assessment for South Oxfordshire (2017).</p> <p>The landscape officer also highlighted the following:</p> <p>The majority of Chalgrove parish, outside the current built up area, lies in landscape character type LCT12: Middle Vale and landscape character area LCA12C: Eastern Middle Vale. A small area at the eastern side lies within landscape character type LCT9: Vale Edge Slopes and landscape character area LCA9F: Eastern Vale Edge Slopes. There is also a 2024 Local Landscape Designation Review of the Districts, which identifies areas of valued landscape as candidate Local Landscape Designations (LLD). The Chilterns Chalk Escarpment Foothills LLD includes a small area at the eastern side of the parish. We therefore recommend the following paragraph is taken into account by the examiner.</p>
13	Page 14- Design Code	<p>The Developers Contributions Supplementary Planning Document date that is referenced should be amended to:</p> <p>'2022 2023 - Developers Contributions Supplementary Planning Document'</p>
14	Page 72- Design Code RD 01 Development principles:	<p>Wooden fencing is stated to be encouraged on front boundaries, this could result in unsightly close board fencing which would not be appropriate, I recommend the reference to wooden fences is removed</p>
Urban Design Officer comments:		
15	General Comment	<p>I welcome the signpost section provided at the top of the document between the different national policy documents and the neighbourhood plan.</p>
16	Page 50 -Design Code	<p>The Joint Design Code has a whole section on the design of streets and streets as spaces (under the movement and connectivity section). We therefore recommend the following changes:</p> <p>iii) Streets should be designed for the needs of</p>

		<p>pedestrians and cyclists as well as motor vehicles in accordance with Oxfordshire County Council's Street Design Guide and also take account of the district council's Joint Design Guide and the Chalgrove Design Code.</p> <p>- Cul-de-sacs should be discouraged as much as possible as they do not result in a permeable layout.</p>
17	Page 52 -Design Code	(iii) Large blank facades without openings should be avoided except when they have noise cancelling benefits such as when facing a road with fast moving vehicular traffic, for example, adjacent to the B480 bypass. If Chalgrove Airfield come forward, the character of the B480 could substantially change. The Code does not seem to take account of the currently allocated strategic development at Chalgrove Airfield.
18	Page 56 -Design Code	It is recommended a link to the built environment focusing on extensions that is referenced in the Joint Design Guide https://data.southoxon.gov.uk/SAV/Built-form_3.html#gsc.tab=0
19	Page 57 -Design Code	<p>ii, clarify metres is it 3 or 5 metres?</p> <p>- Refer to the parking strategy section within the Joint Design Guide under space and layout (in GF 03 Parking, page 65).</p>
20	Page 66 -Design Code	xiii you should make references to the importance of landscaping being incorporated as part of driveways moving away from hardstanding alone designs.
21	Page 67 -Design Code	We recommend adding the following to the text below Figure 116 on Page 67: 'On lane parking may be considered and complemented with street trees. '
22	Page 67- Design Code Figure 117	Rear parking courts could be acceptable when small in size, well overlooked and well landscaped.
23	Page 71-Design Code Figure 122	<p>It is welcomed to see that there is mention of green roofs and rain gardens in the sustainability section. I recommend adding green walls and review Figure 122 with its legend.</p> <p>Currently rain gardens and green roofs don't look right (looks more like solar panels/ rain garden not in the right location).</p>
24	Page 72- Design Code Figure 123	The figure refers to wooden fencing at the front. This is not an acceptable nor durable boundary treatment for the front, negatively affecting the quality of the street

		scene.
25	General Comment	There is nothing specific on proposed street trees throughout the code.
26	General Comment	Checklist section at the end of the code is very much welcomed as it aids to think about design from the outset and what design features result in a high quality design scheme.
27	General Comment	Refer to standards for back to back, side to back, front to front and back to boundary as well as private amenity standards specified within the Joint Design Guide.
*Environmental Health Officer Comment:		
28	Page 29- Policy H1A – Land to the west of Marley Lane	Our Environmental Health Officer also identified that Site H1A should have careful consideration to road traffic noise from the adjacent B480 despite its ‘B’ designation.

*The South Oxfordshire District Council response was updated 25 June 2025 due to an administrative error that resulted in this comment from being omitted from the report.

Response 7

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation
Submitted on 2025-06-12 13:21:40

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Assistant Strategic Planner

Organisation (if relevant):

Oxfordshire County Council

Organisation representing (if relevant):

Address line 1:

County Hall

Address line 2:

New Road

Address line 3:

Postal town:

Oxford

Post code:

OX1 1ND

Telephone number:

[REDACTED]

Email:

[REDACTED]@oxfordshire.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Planning Policy,

Please see attached Oxfordshire County Council's comments on the Chalgrove Neighbourhood Plan.

Many thanks,

[REDACTED]

Assistant Strategic Planner

Strategic Planning

Place Shaping Services

Email: [REDACTED]@oxfordshire.gov.uk

Mob: [REDACTED]

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You can upload supporting evidence here:

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4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING
CONSULTATION:**

District: South Oxfordshire

Consultation: Chalgrove Neighbourhood Plan Review Regulation 15
(submission) Consultation

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council welcomes the opportunity to comment on the Chalgrove Neighbourhood Plan Review. The existing Chalgrove Neighbourhood Plan was made in 2018, and the majority of the policies have been carried forward into the Neighbourhood Plan Review.

Officer's Name: [REDACTED]

Officer's Title: Assistant Strategic Planner

Date: 06 June 2025

ANNEX 1
OFFICER ADVICE

Team: Strategic Planning
Officer's Name: [REDACTED]
Officer's Title: Assistant Strategic Planner
Date: 06/06/25

Strategic Planning Comments

Oxfordshire County Council Strategic Planning Team welcomes the opportunity to comment on the Chalgrove Neighbourhood Plan Review Regulation 15 Version. We note that not much has changed from the previous version of the plan.

While we welcome reference to the policies of the South Oxfordshire District Council Local Plan 2035, we note that the Neighbourhood Plan refers to this as the 'emerging plan' it is however currently the adopted local plan for South Oxfordshire District Council. We also note that there is no reference to the emerging South Oxfordshire and Vale of White Horse Joint Local Plan 2041. In order for the Neighbourhood Plan to be in accordance with the Basic Conditions, it has to be in accordance with any Local Plan policies, therefore it is notable that no reference has been made to the emerging Joint Local Plan. We would recommend the Neighbourhood Planning Committee, reviews the plan and updates any references to the adopted SODC Local Plan 2035, and includes reference to the emerging SODC and VOWDC Joint Local Plan 2041.

In addition to updated references to the emerging local plan, the Neighbourhood Plan should also include reference to several Countywide Policies such as the Oxfordshire County Council Parking Standards¹ and the Local Transport and Connectivity Plan².

We would also expect to see reference to the County Council's Tree Policy³, as well as to the South and Vale Joint Design Guide⁴, and the emerging Local Nature Recovery Strategy⁵.

Since the previous Chalgrove Neighbourhood Plan was 'made' there have been several updates to the National Planning Policy Framework, most recently in December 2024. Neighbourhood Plans must have regard to national planning policies, and as such we would expect to see references to the NPPF within the Neighbourhood Plan updated to reflect the most recent version.

Finally, in regard to developments in the area. In the adopted SODC Local Plan, STRAT7: Land at Chalgrove Airfield, is allocated to provide approximately 3,000 new homes. Pre-application discussion between the developer and both District and County officers is progressing, and an addendum to the Environmental Impact

¹ [Parking standards for new developments](#)

² [Local Transport and Connectivity Plan](#)

³ [Tree policy for Oxfordshire | Oxfordshire County Council](#)

⁴ [Joint Design Guide - South Oxfordshire District Council](#)

⁵ [Oxfordshire's Local Nature Recovery Strategy \(LNRS\) | Oxfordshire County Council](#)

Assessment Scoping Report was published in 2025. The Neighbourhood Development plan should make more reference to this allocation as it is a strategic allocation in an adopted local plan, and the policies and Design Code in this Neighbourhood Plan, will be applicable to this planning application.

We would expect the Neighbourhood Plan to make reference to other, unallocated development which has come forward within the Neighbourhood Plan area since the plan was made in 2017. For instance, P23/S0008/O Land Off Monument Road- application for 150 dwellings and P23/S3349/O- application for up to 160 dwellings on the east of the village. As well as various other developments that may come forward around the peripheries of Chalgrove village.

We would also expect to see an update on the site allocated in this Neighbourhood plan review at H1, as this allocated site has been granted planning permission, and some reserved matters have been submitted to the District Council.

Summary of Officer Comments:

Transport and Place Planning:

Policy wording should be amended to include reference to Oxfordshire County Council Parking Standards. Policy H5 should include reference to OCC's Local Transport and Connectivity Plan and other relevant policies and strategies.

Public Health

Policy wordings should refer to "National Landscape" as opposed to "AONB", and references to scientific studies should use the most up to date research where possible. New developments should not only maintain active travel routes but seek to improve existing and provide new infrastructure.

Archaeology:

We welcome the inclusion of an objective ensuring that heritage assets are protected and enhanced. However, it is notable that there are no policies within the plan to support this objective, and that none of the policies make reference to this objective.

Waste and Circular Economy:

Waste reduction and recycling haven't been fully considered within the plan. Housing policies should ensure that there is sufficient storage for bins both inside and outside properties. Any bin store provision should also be safe and easy for residents to use.

Lead Local Flood Authority:

The documentation referred to is out of date, the most recent Environment Agency update for fluvial and surface water flooding was published in March 2025. The plan should have considered the most up to date information with regards to flooding.

Pupil Place Planning:

School capacity is discussed on page 25 of the Neighbourhood Plan, and contains some factual inaccuracies, we have provided alternative wording in the officer comments below.

More detailed officer comments are below.

District: South Oxfordshire

Consultation: Chalgrove Neighbourhood Plan Review

Team: Transport DM, Place Planning & Transport Policy

Officer's Name & Title: [REDACTED] – Assistant Transport DM Officer, [REDACTED]
– Transport Planner, [REDACTED] – Transport Planner, [REDACTED] –
Assistant Transport Planner and [REDACTED] - Assistant Transport Planner

Date: 04/06/2025

Transport and Place Planning Comments

Chalgrove NP 2025

Page 29: Policy H1A Land to the west of Marley Lane

The policy states:

“Minimum of two off road parking places excluding garage to be provided for 1 to 3 bedroom homes, a minimum of 3 spaces including garage to be available for 4 bedroom houses unless viability or other material considerations show a robust justification for a different mix”

Shall be amended to:

“Provision of cycle and vehicle parking in line with Oxfordshire County Council”

The parking requirements suggested do not align with Oxfordshire County Council standards – adopted in 2022. The Highway Authority will not accept parking provision which is not in accordance with standards. It is recommended that there is a link to the OCC Parking Standards within the text of the policy.

Page 33: Policy H3 Home Working

The policy states:

“Proposals that provide space for a home office or facilitate home working by providing infrastructure and additional visitor parking will be supported”

Shall be amended to

*“Proposals that provide space for a home office or facilitate home working by providing infrastructure and additional visitor **vehicle/cycle** parking **in line with Oxfordshire County Council standards** will be supported”*

Page 34 Policy H4 Residential Parking

The policy states:

‘Proposals for new residential development should provide adequate parking provision in line with the parking standards set out in the Local Plan.’

Should be amended to

*‘Proposals for new residential development should provide adequate parking provision in line with the **Oxfordshire County Council Parking Standards**.’*

The wording of the policy should also be amended to include provisions for cycle parking and encourage the use of sustainable transport.

Page 37: Policy H5 Walking and Cycling

We would encourage reference to OCC’s [Local Transport and Connectivity Plan](#) (LTCP) transport user hierarchy (**Policy 1**) which outlines the order in which we will develop, assess and prioritise transport schemes, development proposals and guidance for new development (**Policy 12**).

It is also worth noting that the council are working towards delivering Part 2 of the LTCP, updating the existing local transport schemes noted in LTP4. We would therefore recommend adding a reference to this.

This policy has scope to include the County Council’s commitment to Vision Zero and adopted [Vision Zero Strategy and Action Plan](#) along with Oxfordshire [Walking](#) and [Cycle Design Standard](#), [Strategic Active Travel Network](#) (SATN) and the council’s Active Travel Network.

Chalgrove Design Guidance and Codes 2025

Page 14: Signpost to other documents

The [Oxfordshire Street Design Guide Part 2](#), adopted in 2024 should be included within this page.

Page 65: GF 03. Parking

Second paragraph states:

“New developments must currently comply with the Oxfordshire County Council Parking Standards, which specify the size and amount of parking required based on property size”

Shall be amended to:

*“New developments must ~~currently~~ comply with the Oxfordshire County Council Parking Standards.” which specify the size and amount of parking required based on ~~property~~ **development** size **and use**”*

Page 66: GF 03. Parking

Code states:

“On plot garages must be at least 6m into a plot to allow for a full car space whilst being able to open a garage door. Garages and car ports must have minimum internal dimensions of 6m in length and 3m in width. These dimensions are clear dimensions measured between any internal structures, such as piers. There should be space to store cycles, trailers and cargo.”

Shall be amended to:

*“On plot garages must be at least 6m into a plot to allow for a full car space whilst being able to open a garage door. Garages and car ports **for a singular vehicle** must have minimum internal dimensions of 6m in length and 3m in width. These dimensions are clear dimensions measured between any internal structures, such as piers. There should be space to store cycles, trailers and cargo.”*

Code states:

“Ensure manoeuvring areas for car parking do not dominate the street frontage, allowing for a generous front garden. Provide adequate visitor parking at new residential developments for people arriving by car and by cycle”

Shall be amended to:

*“Ensure manoeuvring areas for car parking do not dominate the street frontage, allowing for a generous front garden. Provide adequate visitor parking at new residential **and commercial** developments for people arriving by car and by cycle”*

Code states:

“High standard cycle storage facilities should be provided on plot. This provision may vary subject to dwelling number, size and type.”

Shall be amended to:

*“High standard cycle storage facilities should be provided on plot. This provision may vary subject to **development scale** ~~dwelling number~~, size and ~~type~~ **use**.”*

Code states:

“Driveways should be constructed with porous finishes such as cobble, gravel or other materials to minimise surface water run off.”

Shall be amended to:

“Driveways should be constructed with porous finishes such as cobble, ~~gravel~~ or other materials to minimise surface water run off.”

The Highway Authority do not support loose material such as gravel on driveways.

Page 74: General design guidelines for new development

Checklist states:

“Integrate with existing paths, streets, circulation networks and patterns of activity.”

Recommend adding some text about encourage sustainable travel and providing suitable crossing points both within the site and around the village to enhance the safety and attractiveness of walking

Page 76: Street grid and layout

Checklist states:

“Do the new points of access and street layout have regard for the safety of all users of the development; in particular pedestrians, cyclists and those with disabilities?”

Recommend including some text around the importance of crossing facilities both within the new development site and around the village, e.g., over the B480 to enhance the connectivity of the village for residents.

Page 78: Steet grid and layout

Checklist states:

“If covered car ports or cycle storage is included, can it incorporate roof mounted photovoltaic panels or a biodiverse roof in its design?”

Recommend dropping the “car” in this section as there are points within this regarding cycle parking – it’s not just car parking that is being considered. Also, as per OCC’s parking standards, all cycle parking should be covered and so this should not be a question of “if” covered cycle parking is provided (section 4.11 in the parking design standards: *“Cycle parking is to be provided in a convenient location close to building entrances and bus stop locations. Such provisions are to be covered, lit (where appropriate) and in the style of Sheffield stand.”* Recommend rewording this to reflect that.

Team: Public Health
Officer's Name: [REDACTED]
Officer's Title: Health Improvement Practitioner
Date: 28/05/2025

Public Health Comments

The Public Health team welcomes the opportunity to comment on the Chalgrove Neighbourhood Plan Review. Our comments focus on the Plan's potential impact on human health.

Policy C2 - Design and Character: this policy wording includes reference to 'AONB' which has recently been changed to 'National Landscape' so this will need to be amended. This is also the case in the village views section on page 19. In the Design Guidance and Codes document dated February 2025, we support the inclusion of active travel and the need for physical infrastructure such as cycle parking. We would also expect the document to include reference to the impact of active travel on human health, similar to how this is referenced in [QOLF's Design Codes for Health and Wellbeing](#).

Policy H3 – Home Working: this policy is now more pertinent than ever, and as such would benefit from being updated, including the justification section which references a 2016 statistic on home working. Since the Covid Pandemic, hybrid and remote working is now considerably higher and this. The policy could benefit from incorporating a central community space for workers looking for space outside of their home. We question the need for 'additional visitor parking' in this policy, and while we acknowledge the lack of public transport servicing the village, the number of remote workers taking business visitors is negligible.

We acknowledge Policy H5 – Walking and Cycling which focuses on the integration of new housing with existing footways and cycleways. However, it would also be important for the Plan to ensure that new developments provide new and improved infrastructure, such as active travel routes within the boundaries of a development, as well as potentially providing enhancements to the existing network. This could include wayfinding signage or barrier removal and should be secured through planning conditions from the relevant teams. It is noted that the community endorsement section acknowledges the importance of cycle paths within the layout of a new development, therefore this should be included within the policy wording too.

The supporting statement for flooding on page 47 should also state that all new developments should actively mitigate flood risk. This can be achieved in a multitude of ways, including the use of SUDs as well as softer measures such as tree, hedgerow and vegetation planting, which in turn will also benefit biodiversity and provide aesthetic benefits.

Team: OCC Property

Date: 05/06/2025

OCC Property Comments

Oxfordshire County Council (OCC) Property and Estates Team has reviewed the Chalgrove Neighbourhood Development Plan 2018 to 2033 Review, including the Chalgrove Design Guidance and Codes February 2025.

The OCC land ownership in the neighbourhood plan area consists of grass verges, highway, the Chalgrove CP School and School Playing field. No changes are proposed to the policies concerning the recreation grounds or school grounds as such OCC property has no comments to make.

Team: Archaeology
Officer's Name: [REDACTED]
Officer's Title: Team Leader
Date: 04/06/25

Archaeology Comments

The NPPF states that

203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. (NPPF 2024, para 203)

Neighbourhood plans therefore should include a positive strategy for the conservation of the historic environment, including archaeological sites.

This plan does contain an objective (10) to ensure that heritage assets are protected and enhanced which we strongly support.

This is not however supported by the policies within the plan, which make no reference to this objective. This objective will need to be carried over into the policies within this plan to ensure that it can be met.

The Plan does make reference to the archaeological heritage assets within the town, but this is limited to the excavated site of Barentin's Manor only. Chalgrove has a considerable number of archaeological heritage assets within the plan area including a second moated manor site to the NE end of the settlement as well as archaeological evidence of Bronze Age through to Roman settlement from a number of sites on the edge of Chalgrove.

Details of the archaeological background of Chalgrove can be found on [Heritage Gateway](#).

In order to meet the requirements of objective 10, we would therefore recommend that the Neighbourhoods Plan contains a policy for the identification, protection and enhancement of heritage assets, including archaeological sites as suggested below.

Policy - Historic Environment

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets, including archaeological remains, will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning

Policy Framework (NPPF 2021) including heritage statements, informed by archaeological desk-based assessments and fieldwork where appropriate, setting out how heritage assets will be enhanced and protected.

This policy and Objective 10 should also inform other policies which may impact on heritage assets and their enhancement.

Policy H1A - Housing Site Allocation for example is located in an area of considerable archaeological interest and a programme of archaeological work ahead of the development recorded archaeological evidence dating from the Bronze Age, Late Iron Age or Early Roman and a possible area of shrunken medieval settlement. This development did not include the area of the proposed country parkland and the woodland planting and other ground disturbances may impact on further surviving archaeological deposits related to these sites. This policy should also therefore include provision for further archaeological investigations to identify such deposits and require appropriate protection and enhancement of any surviving heritage assets in line with Objective 10.

Team: Waste Strategy and Circular Economy

Officer's Name: [REDACTED]

Officer's Title: Team Leader

Date: 23rd May

Waste and Circular Economy Comments

Waste reuse, reduction and recycling appear to have not been considered fully within the neighbourhood plan.

Oxfordshire councils have ambitious targets to reduce the amount of waste generated and increase the amount recycled as demonstrated in our Joint Municipal Waste Management Strategy 2018-2027.

Enabling the residents of new dwellings to fully participate in district council waste and recycling collections, for example through providing sufficient and convenient storage space for bins both inside properties and externally, will allow Oxfordshire's high recycling rates to be maintained and minimise an increase in residual waste.

Bin store provision which can accommodate the correct number of mixed recycling, refuse and food recycling bins, are safe and easy to use for both residents and waste collection crews and meets the requirements of the waste collection authority are required.

The Neighbourhood Plan may also wish to consider how their community spaces can be used to help reduce waste and build community cohesion through assets such as community fridges, space for the sharing economy (library of things), refill stations, space for local food growing etc.

Team: Lead Local Flood Authority

Officer's Name: [REDACTED]

Officer's Title: Operational Manager- Flood Risk Management

Date: 23/05/25

Lead Local Flood Authority Comments

General Flood Risk comments

The documentation refers to and uses the following:

- The Strategic Flood Risk Assessment commissioned by CNDP October 2014
- The Edenvale Young Flood Risk Modelling and Mapping Report 17th November 2016

These documents appear to be potentially somewhat out of date in relation to showing the areas at risk from flooding from all sources. The EA update their mapping for fluvial and surface water flooding and published these in March 2025. South Oxfordshire DC also updated their own SFRA in September 2024 and therefore it is not clear whether the plan has considered this most up to date information.

It should also be noted that it is important to understand the extent of flooding from surface water, which is now included within the EAs flood map for planning available here [Get flood risk information for planning in England - Flood map for planning - GOV.UK](#), however these do not show a significant extent in relation to surface water in Chalgrove they should be reviewed as part of the plan preparation.

Team: Pupil Place Planning
Officer's Name: [REDACTED]
Officer's Title: Service Manager
Date: 05/06/25

Pupil Place Planning Comments

On Page 25 the Chalgrove Neighbourhood Plan states:

School Capacity - A meeting was held with the Primary School Head and OCC Place Planning Manager in September 2016. The head advised that the school is full in Nursery with some gaps in years 5 and 6. There is total capacity for 240 pupils including Nursery, and 210 without. They currently have 206 pupils (source OCC); recent growth has been mainly due to parents in the catchment area choosing to go to the school following successful OFSTED reports.

Oxfordshire County Council (OCC) advise that the expected numbers of pupils in a development of 200 homes would produce 55 Primary school children, 37 secondary school pupils and 11 children qualifying for free nursery education. If there is insufficient space to accommodate the additional pupils in the village school the pupils will be asked to attend another school in the catchment area with capacity and transport would be provided if needed. A desktop study of the accommodation requirements will be done to give us an initial opinion as to whether additional classrooms would be required; extending the school was previously covered by section 106, a CIL claim now needs to be put in to the District Council by the County Council.

The first underlined text is incorrect and should be amended as follows:

If there is insufficient space to accommodate the additional pupils in the village school, the available school places would be allocated according to the admissions criteria for the school, and pupils unsuccessful in securing a place would need to attend another school. Pupils would qualify for free school transport if they attended their nearest available school and that was not within a 2-mile (for under 8s) or 3-mile (for older children) safe walking route.

The second underlined sentence is also incorrect. If expansion of the school were to be identified as necessary and feasible to meet the needs of a housing development, OCC would still expect to seek section 106 funding from the developer. CIL funding may also be applied for this purpose.

Additionally, the pupil capacity numbers are out of data, the number of primary pupils (excluding nursery) is now 190 (as of January 2025). Assessment of the potential to expand Chalgrove Primary School, has now been undertaken and identified that the

layout and nature of the school's current site would not facilitate expansion of the school, without additional land area being made available.

Response 8

Submitted to Chalgrove Neighbourhood Plan Review: Regulation 16 Consultation

Submitted on 2025-06-12 13:25:55

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Associate

Organisation (if relevant):

Quod

Organisation representing (if relevant):

Homes England

Address line 1:

21 Soho Square

Address line 2:

Address line 3:

Postal town:

London

Post code:

W1D 3QP

Telephone number:

[REDACTED]

Email:

[REDACTED]@quod.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Planning Policy Team,

On behalf of Homes England, please find attached the representations to the current Chalgrove Neighbourhood Development Plan Consultation.

I would be grateful if you could confirm receipt of this email, please.

Many thanks

[REDACTED]

You can upload supporting evidence here:

Homes England Representations to the CNDP 2025.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Chalgrove Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Our ref: Q200088
Email: [REDACTED]@quod.com
Date: 11 June 2025



South and Vale Planning Policy
Abbey House
Abingdon
OX14 3JE

Dear Planning Policy

Chalgrove Neighbourhood Plan Review

I write on behalf of the Homes and Communities Agency ('Homes England') to submit representations to the consultation being held by Chalgrove Parish Council ('CPC') on the document *Chalgrove Neighbourhood Development Plan 2018-2033* ('CNDP').

1 Background

The CNDP review seeks to include a new Core Document (*Chalgrove Design Guidance and Codes*) along with additional minor textual changes to the adopted Chalgrove Neighbourhood Development Plan.

A key purpose of the review is to respond to national and local planning policy changes that have taken place since the adoption of the existing CNDP in 2019. Homes England support the principle of this update, but have concerns that the update does not achieve its intentions.

2 Regulatory requirements

It is important to first review the regulatory requirements applicable to a Neighbourhood Plan. Neighbourhood Plans must meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. The four basic conditions are summarised as follows:

- The Plan must have regard to national policy;
- The Plan must contribute to the achievement of sustainable development;
- The Plan must be in general conformity with the strategic policies in the development plan for the local area; and
- The Plan must be compatible with EU obligations.

These basic conditions are also channelled through the NPPF.



General Conformity with the Local Development Plan

As drafted, the CNDP is not in general conformity with strategic policies in the South Oxfordshire District Council ('SODC') adopted Local Plan 2035. Within the SODC adopted Local Plan, Chalgrove Airfield is allocated for development under policy STRAT7. At the time of writing these representations, and indeed at the time of the CNDP being drafted, the SODC Local Plan 2035 remains the current and adopted development plan for the area. The CNDP should therefore be in conformity with it. Certainly, it should refer to it as the *adopted* Local Plan, and not the emerging one, as currently drafted on pages 21, 22, 24, 28 and 31.

Homes England fully acknowledge that only 'general' conformity is required, but the disregard of a strategic policy means that this general conformity cannot be achieved.

Neighbourhood Plans must also have regard to national policy. For the reasons set out in the next section, Homes England do not consider that this basic condition is met either.

Regard to National Policy

The current overarching national policy is the National Planning Policy Framework 2024. Planning policy guidance sits alongside this to supplement the NPPF and provide greater clarity. Both documents set out clearly the how a neighbourhood plan should be prepared and what it should contain. A Neighbourhood Plan must not constrain the objectives of National Policy and must have regard to its content.

Paragraph 16 of the NPPF 2024 sets out clearly how plans should be conceived, as follows:

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

The NPPF states at paragraph 30 that "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".

The CNDP fails to meet the provisions of Paragraph 16. Fundamentally the CNDP has not been prepared positively and does not seek to support the strategic development needs of the Plan area.



The CNDP contains less than positive wording in respect of SODC adopted local plan site allocation STRAT7. It is not the place of a Neighbourhood Plan to comment on whether it supports a site allocation or otherwise.

The CNDP retains the statement “*The Parish Council and many residents object to this strategic allocation [Chalgrove Airfield STRAT7] on sustainability and highway grounds*”.

This is not reflective of a neighbourhood plan which has been positively prepared. This serves to undermine strategic policies in the adopted development plan and therefore does not have regard to paragraph 30 of the NPPF. This results in the CNDP not being able to meet the basic conditions.

3 Neighbourhood Plan Updates

Recognition of policy revisions

Homes England welcome the intent of the modifications to the CNDP to bring it in line with recent national and local policy updates. However, this has not been undertaken in a robust manner.

The CNDP review should utilise the opportunity to ensure that the document reflects the accurate policy position. It should refer to the adopted SODC Local Plan 2035 and the policies and allocations within.

However, pages 21, 22, 24, 28 and 31 of the CNDP still refer to the “*emerging SODC Local Plan*” This is incorrect. The SODC Local Plan 2035 has been adopted (over four years ago) and stands as the current Local Plan for the district.

4 Design Code and Guidance

Homes England commend the introduction of a Design Code document for the village, and appreciate the work involved in the preparation of such a document. However, the Design Code and Guidance document does not offer any guidance for the development of Chalgrove Airfield. Homes England contend that it must do so, such that it is compliant with the SODC Local Plan 2035, within which Chalgrove Airfield is allocated as a strategic development site. As drafted, there is no guidance from the CNDP on the design for Chalgrove Airfield and is not in accordance with the conditions set down by the Town and Country Planning Act 1990 and Planning and Compulsory Purchase Act 2004.

From a technical perspective, Homes England would recommend that the encouragement of UPVC cladding and UPVC casement windows should not feature as part of the ‘material character’ of a historic village and would suggest that this reference is removed.

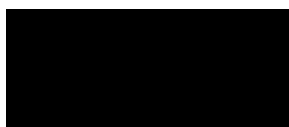
5 Summary

The CNDP has not been positively prepared. It negatively references the allocations within the adopted Local Plan 2035 and makes no provision to aid with the delivery of the objectives of said adopted Local Plan. It has not been suitably updated to reflect the current policy position of Chalgrove



nor the wider SODC area. This is further echoed by the omission of the strategic allocation at Chalgrove Airfield by the Design Code, which should be updated to it as to ensure it is in conformity with the adopted Local Plan.

Yours sincerely



Associate

cc. Homes England