

















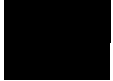



# Eye and Dunsden Neighbourhood Plan: Responses to the publicity period

Response number	Date	Name	Organisation	Link to response	Public hearing	Made plan notification
1	05/12/25	Leigh Rawlins		<a href="#">Full response available on page 5</a>	No, I do not request a public hearing	
2	15/12/25		Ministry of Defence	<a href="#">Full response available on page 6 to 7</a>	Not answered	
3	29/12/25		Office of Nuclear Regulation	<a href="#">Full response available on page 8</a>	Not answered	
4	30/12/25		National Highways	<a href="#">Full response available on page 9 to 10</a>	Not answered	
5	05/01/25	Julie Terney		<a href="#">Full response available on page 11</a>	I don't know	

6	05/01/26	[REDACTED]	Chilterns Conservation Board	<u>Full response available on page 12 to 21</u>	Not answered	[REDACTED]
7	14/01/26	[REDACTED]	Caversham and District Residents Association (CADRA)	<u>Full response available on page 22 to 23</u>	Not answered	[REDACTED]
8	15/01/26	[REDACTED]	Natural England	<u>Full response available on page 24 to 27</u>	Not answered	[REDACTED]
9	21/01/26	[REDACTED]	Thames Water	<u>Full response available on page 28 to 34</u>	Not answered	[REDACTED]
10	23/01/26	Susan Riches		<u>Full response available on page 35 to 40</u>	Yes, I request a public hearing	[REDACTED]
11	24/01/26	[REDACTED]	Kidmore End Parish Council	<u>Full response available on page 41 to 42</u>	Not answered	[REDACTED]

12	26/01/26	Heather Hiscox		<i>Full response available on page 43 to 46</i>	Yes, I request a public hearing	
13	26/01/26	Martin Hiscox		<i>Full response available on page 47 to 52</i>	Yes, I request a public hearing	
14	27/01/26		Gladman Developments	<i>Full response available on page 53 to 125</i>	Yes, I request a public hearing	
15	27/01/26		Savills on behalf of Mr and Mrs Hiscox	<i>Full response available on page 126 to 130</i>	Not answered	
16	27/01/26		Savills on behalf of Coppid Farming Enterprises LLP	<i>Full response available on page 131 to 134</i>	Not answered	
17	27/01/26		South Oxfordshire District Council	<i>Full response available on page 135 to 152</i>	No, I do not request a public hearing	

18	27/01/26	Leigh Rawlins		<i>Full response available on page 153</i>	Not answered	
19	27/01/26		Oxfordshire County Council	<i>Full response available on page 154 to 164</i>	Not answered	

## **Response 1**

### ***Your comments:***

This is an excellent piece of work rooted in engagement with the local communities.

I am very pleased to see that this is now moving towards examination.

# Response 2



Defence  
Infrastructure  
Organisation

[Redacted]

Ministry of Defence  
Safeguarding Department  
DIO Head Office  
St George's House  
DMS Whittington  
Lichfield  
Staffordshire WS14 9PY

Your reference:  
Eye and Dunsden Neighbourhood Plan  
Our reference:  
DIO 10069500

Mobile: [Redacted]  
E-mail: [DIO-Safeguarding-  
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory@mod.gov.uk)

Planning Policy Team,  
South Oxfordshire District Council  
Via Email

15<sup>th</sup> December 2025

Dear Planning Policy Team

It is understood that South Oxfordshire District Council are undertaking a consultation regarding their Eye and Dunsden Neighbourhood Plan under Regulation 16. This document will guide the future development of the plan authority area.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 102 of the National Planning Policy Framework (December 2024) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

**Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address.**

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

The area covered by the Eye and Dunsden Neighbourhood Plan consultation authority area contains and is washed over by a safeguarding zone that designated to preserve the operation and capability of the Central WAM (Wide Area Multilateration) Network.

Central WAM Network is a new technical asset, which contributes to aviation safety by feeding into the air traffic management system in the Central areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Overton Neighbourhood Plan authority area.

New development may have detrimental impacts depending on site location relative to safeguarded sites and assets

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electromagnetic interference, which may be a particular issue where solar PV systems are developed, or moving surfaces which may be visible to and detectable by radar systems such as the blades of a wind turbine.

The MOD recommend, in order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



DIO Assistant Safeguarding Manager

# Response 3

**From:** [ONR Land Use Planning](#)  
**To:** [Planning Policy S&V](#)  
**Subject:** Land Use Planning Application - Eye and Dunsden Neighbourhood Plan Consultation  
**Date:** 29 December 2025 10:59:29

You don't often get email from onr-land.use-planning@onr.gov.uk. [Learn why this is important](#)

**\*\*EXTERNAL\*\***

Dear Sir/Madam,

Thank you for your email.

Please note that ONR's land use planning processes published at <http://www.onr.org.uk/land-use-planning.htm> **may** apply to some of the developments within the Eye and Dunsden Neighbourhood Plan Consultation.

If you are a Local Authority or neighbourhood with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require:

- confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- that the developments do not pose an external hazard to the site.

Kind regards,

Land Use Planning  
Office for Nuclear Regulation  
[ONR-Land.Use-planning@onr.gov.uk](mailto:ONR-Land.Use-planning@onr.gov.uk)

-----Original Message-----

**From:** South and Vale District Councils <[jointheconversation@southandvale.gov.uk](mailto:jointheconversation@southandvale.gov.uk)>  
**To:** [onr-land.use-planning@onr.gov.uk](mailto:onr-land.use-planning@onr.gov.uk);  
**Cc:**  
**Sent:** 27/11/2025 10:59  
**Subject:** Have your say on the Eye and Dunsden Neighbourhood Plan

[View this email in your browser](#)

# Response 4

**From:** [REDACTED]  
**To:** [Planning Policy S&V](#)  
**Cc:** [Planning SE](#); [REDACTED] [Spatial Planning](#); "[transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)"  
**Subject:** FORMAL RESPONSE@2025 12 30: (NH/25/14005) Eye & Dunsden Neighbourhood Plan Consultation has begun  
**Date:** 30 December 2025 16:35:04

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**\*\*EXTERNAL\*\***

**FAO:** Planning Policy Team, South Oxfordshire District Council

**Our Reference:** NH/25/14005

**Re: Eye & Dunsden Neighbourhood Plan Consultation**

Dear Sir or Madam,

Thank you for your e-mail dated 2 December 2025, inviting National Highways to comment on the above consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M4 motorway.

We have reviewed the above consultation and have 'No comments'.

Please continue to consult us on the issues concerning planning via our team's inbox: [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk)

Regards

[REDACTED]  
South East Region, Operations Directorate  
National Highways | Ground Floor, Building 1000, Cathedral Square, Guildford,  
GU2 7YL.

**Mobile:** [REDACTED]

**Web:** <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

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**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)**

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## **Response 5**

### ***Your comments:***

This development will spoil a lovely hamlet. There are no immediate amenities so residents will have to travel and this will no doubt mean each household has at least one car probably two. There will increased traffic; essential services such as dentists and doctors stretched even further.

# Response 6



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Contact: Planning Team, Chilterns Conservation Board

Email: [planning@chilterns.org.uk](mailto:planning@chilterns.org.uk)

**By portal upload to**

My Ref: F:\Planning\DM\Neighbourhood Plans\Eye and Dunsden

6<sup>th</sup> January 2026

**Eye and Dunsden Neighbourhood Plan Submission Draft 2011-2035  
Comments on the National Landscape policies, including setting  
Chilterns Conservation Board Response, 6<sup>th</sup> January 2026**

Many thanks for consulting the Chilterns Conservation Board (CCB) on the Eye and Dunsden Neighbourhood Plan Submission Draft 2011-2035.

We support this plan.

We have added some additional points and set out their supporting rationale to assist. For ease of reference, we have created a table with both the submission draft and our suggested revisions. These are relatively minor amendments to the text and/or points regarding the evidence currently under review. These latter points deal with the NPPF (2025) consultation draft and the evidence base to the Vale/SODC Joint Plan.

~~Strikeout~~ and underlined text for deletions and additions. *Rationale is in italic text.*

Policy/Topic/Page reference	Submission Draft 2011-2035	CCB's Suggested amendments/comments
Paragraph 2.1.		<p><b>Potential NPPF 2025 Consultations edits</b></p> <p>With the arrival of the NPPF (December 2025) revisions and national decision-making policies, these paragraphs will change. For example, the purpose of the planning system (sustainable development) is now, (subject to consultation), set out in the revised NPPF at paragraph 16 (a), (b), and (c).</p> <p>We appreciate that the Neighbourhood Plan body may wish to revise these points, with the possibility of further clarification or confirmation as the Neighbourhood</p>



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		<p>Plan progresses to the examination stage.</p> <p><b>The NPPF 2025 consultation also deals with NPs at its policy PM5.</b></p> <p>The role and objectives for a Neighbourhood Plan are set out at Plan-Making (PM) policy PM5. We appreciate that the Neighbourhood Planning body will want to consider such new national policies, albeit they are the subject of consultation at the present time.</p>
<p>Paragraph 2.2.2 &amp; Figure 2 &amp; Figure 3.</p> <p>Paragraph 2.2.3 (a)</p> <p>Paragraph 2.2.8</p>	<p>At the lower levels in the settlement hierarchy (of which the parish settlements are designated as being), the focus of development is to allow limited amounts of housing and employment, to enhance and protect the rural character of the open countryside and the <del>Chilterns Area of Natural Outstanding Beauty (AONB)</del>. The Overall Strategy diagram extract from the Local Plan below highlights the approach taken.</p>	<p><b>Edit for new status as the Chilterns National Landscape.</b></p> <p>(now) Chilterns National Landscape</p>
<p>2.4. Joint Local Plan 2041</p>		<p><b>Status of the new Joint Vale and SODC Local Plan.</b></p> <p>As with the NPPF above, the Joint Vale and SODC Local Plan may also require some edits. As above, we know the NP body will be aware of this. Policies on nature recovery, landscape, tranquillity, and valued landscapes are relevant to the protection of National Landscapes (primarily in draft chapter 12).</p>
<p>Paragraph 3.1.4</p>	<p>The terrain is undulating and gains height from the river. Ancient woodland is located in the Chiltern Hills and a part of the Parish is within the designated Chilterns Area of</p>	<p><b>Suggested amendments to the text</b></p> <p>The terrain is undulating and gains height from the river. Ancient woodland is located in the Chiltern Hills and a part of the Parish is within the designated Chilterns <b>Area</b></p>



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	Outstanding Natural Beauty (AONB).	<p><del>of Outstanding Natural Beauty (AONB).</del> <u>National Landscape and an acknowledged special quality within that landscape as set out in the Management Plan for 2025-2030 (as updated).</u></p> <p>For updates, please see</p> <p><a href="https://www.chilterns.org.uk/what-we-do/future-proofing-the-chilterns/management-plan/">https://www.chilterns.org.uk/what-we-do/future-proofing-the-chilterns/management-plan/</a></p>
<b>Section 5. LAND USE POLICIES</b>	<p>A small part of the north-western Parish falls within the <del>Chilterns Area of Outstanding Natural Beauty (AONB)</del>, to the north of Bishopsland Farm. It is also worthy of note that the Parish is actively being considered for an extension to the AONB. At the time of writing, consultants have been commissioned by Natural England to review the boundary of the Chilterns Area of Outstanding Natural Beauty (AONB), as part of Natural England's Landscape Designation Programme. and, Eye &amp; Dunsden Parish Council are part of the Joint Parishes AONB Group (JPAG) who are a collaborative working group of neighbouring parishes making and supporting the case for an extension to the southern boundary of the AONB that would include the whole of the parish of Eye &amp; Dunsden.</p>	<p><b>Updates regarding the DEFRA-led Boundary Extension project, which ceased in 2025.</b></p> <p>As above, about the Chilterns National Landscape replacing the AONB.</p> <p><b>Boundary extension project.</b></p> <p>Natural England ceased all further work on the boundary extension on 9<sup>th</sup> May 2025. The CCB's press release, at that time, noted that <i>'It is encouraging that Natural England has suggested that, if resources become available in the future, it may be able to complete the project, but it has also emphasised that this is by no means guaranteed'</i>.</p> <p><a href="https://www.chilterns.org.uk/news/deep-disappointment-at-cancellation-of-the-chilterns-boundary-review/">https://www.chilterns.org.uk/news/deep-disappointment-at-cancellation-of-the-chilterns-boundary-review/</a></p> <p>The NP team may want to consider Natural England's Q&amp;A section (see the link) and its answer to Q5, which addresses the evidence base. This evidence base may be pertinent to the justification for a valued landscape, with potential implications for the proposed Neighbourhood Plan's policy ED VL1.</p>
<b>5.2.4</b>	<p>Valued Landscapes</p> <p>The Eye &amp; Dunsden Parish Landscape</p>	<p><b>Valued landscape and the evidence base.</b></p> <p>We noted this study, which will form an important part of the evidence base. A similar approach was successfully</p>



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	Character Assessment6 (LCA - Appendix II)	<p>followed by the Kidmore End Neighbourhood Plan and formed an important part of their evidence base (see their evidence base in appendices C1, C2a &amp; C2b, which can be accessed via the SODC's Neighbourhood Planning pages).</p> <p>The Landscape Institute (2021) published updated guidance in the form of their TGN 02-21 Assessing Landscape Value Outside National Designations. We note this at 5.2.10 in the NP and support its inclusion and application to justify this policy.</p>
5.2.6	This report builds on published landscape character studies, most notably the South Oxfordshire Landscape Character Assessment 2017 (in support of the South Oxfordshire Local Plan 2034), the Oxfordshire Historic Landscape Character Assessment 2017, and data sources from South Oxfordshire District Council (SODC).	<p><b>Landscape Character Evidence</b></p> <p>These studies are now supplemented and/or replaced by the new evidence base for the Vale/SODC's Joint Plan, in the <i>Landscape Character Assessment for South Oxfordshire and Vale of White Horse South Oxfordshire District Council and Vale of White Horse District Council Final Report Prepared by LUC September 2024</i>.</p> <p>Subject to the progress of the Joint Plan and the extent to which such policies are challenged during the examination phase, the CCB recommends that the NP team liaise with the SODC Neighbourhood Plan policy team on this content and its status as the Joint Plan progresses.</p>
<b>PLCA3A &amp; 3B : Dunsden Open Dipslopes and Thames Valley Sides.</b>		<p><b>Landscape sub-areas.</b></p> <p>We support the rationale and policy base that reinforces this sub-area.</p> <p>We very much support the assessment that this landscape '<i>makes an important contribution to the landscape and visual setting of the Chilterns AONB</i>'</p>
<b>PLCA4: Dunsden Semi-enclosed Dipslopes, River Cliff and Terraces</b>		<p><b>Landscape sub-areas.</b></p> <p>We support the rationale and policy base that reinforces this sub-area.</p>



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		<p>We very much support the assessment that this landscape <i>'Makes an important contribution to the landscape and visual setting of the Chilterns AONB and provides a link from the AONB across and down to the River Thames'</i></p> <p>We agree that much of this LCA is indistinguishable from the Chilterns AONB landscape.</p> <p>The NP assessment of valued landscapes commissioned a 2020 study and applies the Landscape Institute's TGN 02-21. We support the designation of these valued landscapes, consistent with the approach endorsed by the NP Examiner's report in the Kidmore End Neighbourhood Plan. Please see paragraphs 7.85 to 7.90 of this report, particularly 7.89 (express support for a valued landscape policy).</p> <p>We wholeheartedly support this approach. The recommendations in Table 5 are evidence-based and supported by an appropriate landscape character assessment.</p>
<p><b>ED-VL1 Landscape Character and Valued Landscapes</b></p>	<p>The individual Parish Landscape Character Areas as set out in the Landscape Character Assessment<sup>1</sup> (Appendix II), are identified as valued landscapes as set out below and in Tables 1-4:</p> <p>a) PLCA1: River Thames and Meadows</p> <p>b) PLCA2: River Thames, Meadows and Lakes</p> <p>c) PLCA3A and PLCA3B: Dunsden Open dip slope and Thames River Valley Sides</p>	<p><b>Landscape Character Policies.</b></p> <p>We <b>support</b> this policy.</p> <p>In light of the (December 2025 draft NPPF, especially National Decision-making policy N2 <i>'Improving the natural environment'</i> at (a &amp; d) ) we would recommend revisions to 'preserve and where possible enhance the landscape character of the Parish....<b>TO</b>.....<u>conserve and enhance landscape character and natural beauty of the countryside and identify opportunities for those qualities to be conserved and enhanced, with particular reference to existing natural features of visual, historic or nature conservation value wherever possible;</u> <del>Development proposals should preserve and where possible enhance the landscape character of the Parish,</del> taking into account the recommendations in the Landscape</p>



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	<p>d) PLCA4: Dunsden Semi-enclosed dip slope River Cliff and Terraces</p> <p>Development proposals should preserve and where possible enhance the landscape character of the Parish, taking into account the recommendations in the Landscape Character Assessment (Appendix II), Settlement Character Appraisal and Design Code (Appendix I) as summarised for each Parish Landscape Character Area in Table 5 above.</p> <p>Development proposals should ensure the characteristics which define the landscapes as valuable are reflected in the proposals, including: • the historic pattern of fields, • watercourses* and wetlands (as identified on figure 26), • network of trees, copses, hedgerows and boundaries (hedgerows, trees, walls etc.), • Ancient woodland (including Spanhill Copse, Ash Copse, Round Wood, Comp Wood, Lady's Shaw, and Blackhouse Wood, • identified wildlife and strategic wildlife green corridors (shown in figure 26), • highways and public rights of way; and recreational open space and public spaces, and • the contribution that the landscape makes to the distinctive character and identity of the settlements within the Plan area. Opportunities should be sought where appropriate to minimise the adverse</p>	<p>Character Assessment (Appendix II), Settlement Character Appraisal and Design Code (Appendix I) as summarised for each Parish Landscape Character Area in Table 5 (continues).....</p>
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	<p>impact of any intrusive or intensive land uses and to reintroduce and enhance traditional orchards and deciduous woodland, grassland, watercourses, wetland areas, and allotments.</p>	
<p><b>5.3. Key Views and Vistas</b></p>	<p><b>Figure 21 Important Views identified in PLCA1, PLCA2, PLCA3 and PLCA4</b></p> <p><b>POLICY ED-VL2 Important Views</b></p> <p><b>PLCA3A Key Views 1.</b> View from the AONB across to the west 2. View from within the AONB across to the east 3. View from the edge of the AONB across to the east and west 4. Elevated view across to Caversham woods to the west, Comp Wood to the east 5. View to the east towards Dunsden church, the Grade II* Row Lane Farmhouse and to far horizons</p> <p>Development proposals which would have a <b>significant adverse</b> impact on an identified view will not be supported.....</p>	<p><b>Key views and vista.</b></p> <p>We support this approach and the NP's stance on <i>views in</i> and <i>views out</i> of the Chilterns National Landscape, is consistent with our approach in the CCB's Position Statement on Development within the Setting of the Chilterns (also please see paragraph 14 of this Position Statement).</p> <p>Please see <a href="https://www.chilterns.org.uk/what-we-do/planning-and-development/published-advice-guidance/">https://www.chilterns.org.uk/what-we-do/planning-and-development/published-advice-guidance/</a></p> <p>In reinforcing this point the Landscape Institute's Guidance on '<i>assessing the significance of visual effects</i>' and the sensitivity of a visual receptor (such as experienced by a receptor, such as a walker in the landscape) makes the point that....</p> <p>Guidance for Landscape and Visual Impact Assessments (GLVIA) 3<sup>rd</sup> edition, para 6.33 (page 113)</p> <p><i>'The visual receptors most susceptible to change are generally likely to include:</i></p> <p><i>(second bullet) people, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;</i></p> <p><b>We support</b> the inclusion of these key views and vistas. We would recommend the additional caveat that the finding as stated in the policy as to '<i>significant adverse</i>' would be a matter</p>



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		<p>for determination when applying the methodology contained within the Landscape Institute's GLVIA 3<sup>rd</sup> edition assessment of visual effects. We recommend this to ensure a consistent approach is followed when a planning application is submitted and assessed. A cross-reference to the Landscape Institute's GLVIA 3<sup>rd</sup> edition would suffice.</p>
<b>POLICY ED-DH1 Design Principles &amp; Code</b>		<p>We support this policy and the application of Design Coding.</p> <p>The Design Coding for the 3 individual settlements is comprehensive and supported. In the evidence base, we recommend citing the Chilterns Buildings Design Guide, as there are many overlaps due to shared vernacular and materials. With reference to the latter and the use of red/orange bricks and tiles/tile hanging, we would also recommend the inclusion (in the evidence base) of the Chilterns Buildings Design Guide Supplementary Technical Note on Chilterns Brick, Chilterns Roofing Materials and Chilterns Flint.</p> <p><a href="https://www.chilterns.org.uk/what-we-do/planning-and-development/published-advice-guidance/">https://www.chilterns.org.uk/what-we-do/planning-and-development/published-advice-guidance/</a></p>
<b>POLICY ED-CE2 Rural Buildings and Commercial Development</b>		<p>We support this policy.</p> <p>As above, the AONB will now be replaced by the Chilterns National Landscape.</p>

The CCB also appends our notes on the new duty under s.85 of the Countryside and Rights of Way (CRoW) Act 2000. These are submitted to assist and are of general application when considering policy and development management within the Chilterns National Landscape and when assessing impacts on its setting.



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**Chilterns**  
National  
Landscape

## Our Notes on the new 'duty to further'

The new duty now amends section 85 to read, **s.85 CRoW Act 2000, General duty of public bodies etc.**

*In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.*

(Our emphasis).

The **National Landscapes Association (NLA)** published a briefing note in November 2024. On development management matters, this stated (on page 6) and of relevance,

*For decisions relating to planning applications:*

- *Assess what impact the proposal would have on the purpose of designation. Consider how the natural beauty of the area might be affected, were the proposal to go ahead (remember to consider the holistic concept of natural beauty), and consider how the proposal would align with the AONB Management Plan objectives/principles/policies.*
- *Consider whether this would cause harm to the natural beauty of the area. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes. (see footnote 12 - Natural England (2023) 'Natural England's addendum to our Deadline 9 response in relation to the enhanced duty in relation to Protected Landscapes including the Kent Downs Area of Outstanding Natural Beauty'. Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-006179Natural%20England%20-%20Deadline%209a%20Submission.pdf> (Annex 2, para. 2.1.3).*

This **NLA briefing note** is available at

<https://national-landscapes.org.uk/guidance-for-local-planning-authorities-on-crow-s-85-duty>

On 16<sup>th</sup> December 2024 DEFRA published its own guidance on the new duty. This **DEFRA guidance** is available at

<https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>

A relevant extract is the section entitled '**What a relevant authority should do**'

(Our emphasis is underlined).

The duty is an active duty, not passive, which means:

- a relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes
- as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes
- a relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to

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further the statutory purposes of Protected Landscapes - for example, policies, strategies, operational procedures, estate management plans, investment plans, contracts, works instructions, assessments and reports which should be able to evidence the proper discharge of the duty by the relevant authority

- for ongoing functions, a relevant authority may consider it appropriate to instigate a formal compliance monitoring and reporting system to ensure adherence to the duty
- for development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible
- for the development and management of land, water and estates, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities, where reasonably practical and operationally feasible
- for day-to-day activities, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities where reasonably practical and operationally feasible



Chilterns Conservation Board

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6<sup>th</sup> January 2025



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# Response 7

## EYE & DUNSDEN NEIGHBOURHOOD PLAN 2011-2035 CONSULTATION

### Comments on behalf of the Caversham and District Residents Association (CADRA)

CADRA represents the residents of Caversham, Caversham Park Village and Emmer Green, all of which share an extensive boundary with Eye & Dunsden Parish from north of the Emmer Green water tower south to the Thames, and the Caversham Lakes are entirely within the Parish. The Parish Neighbourhood Plan is therefore of great significance to the residents we represent.

CADRA wishes to endorse the Plan and assure SODC that the current Submission Draft has CADRA's full support.

Thanks to its distinctive, open rural character the Parish serves the urban development of North Reading as a green lung, contributing to its biodiversity and air quality, and as an area for outdoor recreation and for hospitality. This works both ways, as the restaurants and public houses in the Parish benefit greatly from their customers from Caversham, Caversham Park Village and Emmer Green.

### **Focus of development (section 2.2)**

CADRA supports the underlying SODC strategy which is to focus development on a number of large-scale strategic sites, either closer to Oxford or around the larger South Oxfordshire settlements, well away from the Eye & Dunsden Parish. CADRA agrees with the Plan that the focus of development should be to allow only limited amounts of housing and employment and to enhance and protect the rural character of the open countryside and the Chilterns National Landscape. The rural local character is currently at risk as speculative development proposals are being put to SODC and Reading Borough Council which would negatively transform the landscape of the Parish and of its boundary with Caversham and Emmer Green.

### **Policies (section 5)**

**Maintaining local green gaps** (5.5). CADRA supports the Plan's strong case for not expanding housing in the Parish, which would extend the Reading urban area into South Oxfordshire and transform the common boundary. Both the Plan and CADRA are particularly concerned about maintaining the gaps between Playhatch and Caversham Park Village, between Littlestead Green and Caversham Park Village and between Emmer Green and Dunsden Green (Policy ED-VL4).

**Biodiversity** (5.6). The Plan notes the woodland forming a linear feature along the western edge of the Parish, including Blackhouse Wood and areas of woodland adjacent to Caversham Park Road. CADRA agrees strongly that development proposals should maintain and enhance the local biodiversity of the Plan area, including the maintenance and creation of wildlife corridors, designated or proposed local nature sites or reserves and Local Wildlife Sites, some of which are alongside or close to the boundary (Policy ED-BG11). In addition, CADRA supports the Plan's proposals to protect green and blue infrastructure within the Parish, in particular in relation to green gaps and to the Caversham Lakes.

**Caversham Lakes** (5.7). The Plan echoes CADRA's concerns that, as the extraction works are gradually ceasing, the area is now used for both water-based recreation purposes and as quieter areas designated for wildlife but that the wildlife lake has been in unlawful use as a leisure facility and the wildlife areas have been adversely impacted. CADRA supports the Plan's affirmation that any harm to the special ecological interest of the proposed Local

Wildlife Site and the value of the site to protected species should not be considered acceptable (Policy ED-BG13).

**Flooding** (5.9). A considerable part of the Parish lies within Flood Zone 3 (including much of the Caversham Lakes area) and the nature of the Parish's landscape also results in surface water flooding in other areas. CADRA shares the concerns expressed in the Plan, especially in relation to the flooding of the A4155 and B478, key roads for traffic to and from Caversham. CADRA supports Policy ED-FR1 that any new development must take the flood risk into account but believes this should go further and exclude any development which might in any way exacerbate the flood risk to through traffic.

**Housing** (5.15). SODC's Local Plan does not require any further housing to be supplied by the Parish. CADRA understands the Parish's concern that with the pressure that much of the Plan Area experiences from the proximity to Reading the quality of life in the settlements could unacceptably deteriorate from inappropriate additional development. Policy ED-H1 seeks to constrain this and maintain the rural character of the settlements.

**Connectivity improvements** (5.16). CADRA understands the Plan's concern that the area is adversely impacted by its close proximity to Reading and residents using the area as a short cut or to circumvent traffic queues. Caversham and District residents also suffer from the high volume of traffic movement on the B478 from Sonning, where the Sonning Bridge is a major congestion point, and the A4155 Reading to Henley Road. The Plan notes the potential for a new Thames crossing that would cross the Lakes area but is concerned that a solution will have severe adverse impact on Parish residents, and also raises concern at the potential for new Park and Ride sites located within the Parish adjacent to the edge of Reading Borough. While solutions are outside the scope of a Neighbourhood Plan CADRA would be pleased to liaise with the Parish Council on a common understanding of possible ways forward.

**Road safety and junctions** (5.17.1-5.17.5). CADRA agrees strongly with the Plan's concern about the Henley Road/Caversham Lakes junction which is of significant concern on highway safety grounds. CADRA has also raised this issue. No policy is proposed in the Plan which would address this but CADRA would be pleased to liaise with the Parish Council on a possible common approach.

**Transport and highways** (5.17.6). CADRA notes the Plan's concern to promote sustainable forms of transport and ensure that any new development does not exacerbate the current traffic concerns. Given the value of the Parish's rural landscape beyond its boundaries, CADRA agrees that any proposals for development should not cause visual harms or adversely impact narrow lanes or the Rights of Way network (Policy ED-CI1).

**CADRA January 2026**

# Response 8

Date: 15 January 2026  
Our ref: 534795  
Your ref: Eye & Dunsden Neighbourhood Plan



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Neighbourhood Planning Team  
South Oxfordshire District Council

## BY EMAIL ONLY

[planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk)

Dear Sir/Madam

### Eye & Dunsden Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 27 November 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](mailto: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/)<sup>1</sup> 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 \(England\)](#), 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](#) .

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. 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](#)<sup>3</sup>.

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/)<sup>4</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>7</sup> 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.

<sup>1</sup> <http://magic.defra.gov.uk/>

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

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

<sup>4</sup> <http://magic.defra.gov.uk/>

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

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

<sup>7</sup> <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](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. 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](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> 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](#)<sup>12</sup>.

## **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](#)<sup>13</sup>).
- 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).

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

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

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

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

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

<sup>13</sup> <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 9



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21 January 2026

## South Oxfordshire District –Eye and Dunsden 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**

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 December 2025 draft National Planning Policy Framework (NPPF) consultation, published by the UK Government, proposes updates to national planning policy. The draft highlights the importance of resilient water infrastructure, with Policy W4: Water Infrastructure supporting the delivery and upgrade of water supply and treatment facilities. The policy recognises the benefits of improving capacity, reliability, and water quality, stating that proposals for such infrastructure should be given ‘substantial weight’.

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.

### **Policy ED-FR1 Flooding and Drainage - 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 are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

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 10**

### ***Your comments:***

Please see the attachment with supporting evidence.

### ***Public hearing:***

I believe a public hearing would be helpful because my objection raises significant procedural concerns and personal impacts that are not easily conveyed in writing. A hearing would allow me to clarify these issues, answer any questions, and ensure that my representation is fully and accurately considered.

**From:** [REDACTED]  
**To:** [Planning Policy S&V](#)  
**Subject:** Formal Objection - Orchard Cottage, Dunsden Green - Eye and Dunsden Neighbourhood Plan  
**Date:** 23 January 2026 15:12:51  
**Attachments:** [Formal Objection - Orchard Cottage, Dunsden Green - Eye and Dunsden Neighbourhood Plan.pdf](#)

---

**\*\*EXTERNAL\*\***

Dear Sir/Madam

Please find attached my formal representation objecting to the proposed designation of part of my private residential garden at Orchard Cottage, Dunsden Green, as “Important Open Space” within the submitted Eye and Dunsden Neighbourhood Plan 2011–2035 (August 2025).

The representation identifies specific factual inaccuracies, evidential gaps, and procedural issues within the Plan and its supporting documents, with referenced page numbers provided for ease of review.

I wish to formally note that my property was included in the Plan without any prior notification or consultation. This is my home, and being placed in this situation has caused my family and me significant upset and stress. The actions of the Parish Council have been wholly unacceptable, demonstrating a lack of transparency, fairness and good governance, with no genuine attempt to engage or discuss my concerns at any stage. I request that these matters, including the emotional impact, be brought to the attention of the independent inspector.

A copy of this representation has also been submitted via the online portal. I would appreciate confirmation by return email that this objection has been received and successfully downloaded.

Thank you for your attention to this matter.

Yours faithfully

Mrs S Riches

This email originates from outside of the council.  
Keep this in mind before responding, opening attachments or clicking any links, unless you recognise the sender and know the content is safe.  
If in any doubt, the grammar and spelling are poor, or the name doesn't match the email address then please contact the sender via an alternate known method.

*'Orchard Cottage'*  
*Tagg Lane*  
*Dunsden Green*  
*Oxfordshire*  
*RG4 9PR*

17 January 2026

Dear Sir/Madam,

I write to formally object to the proposed designation of part of my private residential garden at Orchard Cottage, Dunsden Green, as an "Important Open Space" within the submitted Eye and Dunsden Neighbourhood Plan, 2011–2035 (August 2025, p.69, Figure 39, Appendix 1, p.25, Figure 18), and to its continued inclusion within Appendix IV: Local Green Space Assessment (V2, 4 July 2025, pp. 6-7,14, DG-5).

Despite raising concerns with both the Parish Council and Steering Committee prior to submission, and in the absence of any direct consultation with me as the landowner, no substantive or reasoned response has been provided to justify the inclusion of my property. The evidence presented below demonstrates that the designation is unsound, unjustified, and procedurally flawed, and relies on multiple factual inaccuracies which remain unresolved and are formally reiterated at this stage.

I therefore respectfully request that my property, which I have occupied continuously for over 25 years, be excluded from the Neighbourhood Plan and removed from all related references, including appendices, maps, and supporting documentation.

### **1. Inconsistent and unjustified designation**

Earlier drafts of the Neighbourhood Plan (NP) proposed the same land for designation as Local Green Space. That proposal was subsequently withdrawn (NP p.53, Figure 30, Dunsden Green-DG) following representations and legal intervention, which identified factual inaccuracies and a failure to meet the NPPF requirements, including the absence of demonstrable community benefit.

Notwithstanding this, and contrary to the Parish Councils own Local Green Space Assessment Matrix which explicitly recommends that the land should now not be designated (Appendix IV, p.7, DG-5), part of the same site is now being proposed as an Important Open Space in the Neighbourhood Plan (NP p.69, Figure 39, Appendix 1, p.25, Figure 18). This has occurred in the absence of any new evidence, updated assessment, material change in circumstances, consultation, or explanation of how this designation differs from the previously rejected Local Green Space proposal. Without new evidence, the redesignation of land that previously failed to meet national policy tests cannot be justified.

### **2. Failure to meet "Important Open Space" criteria**

The land is a private, enclosed, residential garden forming part of my lawful residential curtilage, as confirmed by my title deeds. It has:

- No public access or recreational use (Appendix IV, p.7, DG-5)
- No demonstrable community use or benefit
- No historical or archaeological significance
- No physical or functional relationship with the Village Green (DG-1) or Community Orchard (DG-2)

The area shown is not a separate site; it forms an integral part of my garden, as consistently confirmed across multiple plan figures and appendices (NP pp.32, 36, 46, 53, 69, 83, 87, 89, 99, Appendix 1 pp.3-4, 7, 22-24, 26, Appendix II pp.35,47, 65-66, 71-72, 81, Appendix III pp.42, 52, 54, 56 and Appendix IV pp.10–11, 13). It is also correctly reflected on the Eye and Dunsden Neighbourhood Plan Facebook page and a recent South Oxfordshire District Council tree preservation map for The Cottage (adjacent), dated 31.07.24

Notably, this is the **only private residential garden** proposed for designation within the entire Neighbourhood Plan area. Combined with the proximity of a Parish Council/Steering Committee member's property being within line of sight, this raises concerns regarding governance, impartiality and potential conflicts of interest. No evidence has been provided to demonstrate that any such matters were formally declared or appropriately managed.

### 3. Inadequate and unrepresentative consultation

The Consultation Statement (V2, October 2025) demonstrates extremely limited engagement and does not substantiate the claim that the proposed designation of my garden reflects community views.

- The Consultation Statement confirms that the Regulation 14 Pre-Submission Consultation was distributed to a total of 849 individuals, including 421 residents, 83 local businesses and organisations, 33 statutory consultees, and additional individuals/households who had requested to be kept informed (NP p.16, 3.2.2; Consultation Statement pp.4, 3.1; p.14, 6.0). Despite this wide distribution, only 15 responses were received across the entire plan area, of which just **3** were from Parish residents (Consultation Statement p.9, 4.2.5)
- The Informal Consultation Event Questionnaire, similarly produced a total of just 29 responses, of which **only 3** were from Dunsden Green residents, including one member of the Steering Committee (Consultation Statement, 30 August 2021, pp.25-51).
- The Consultation Statement (p.10, 4.3) claims that landowners were notified and their comments considered. In fact, I was not contacted at any stage prior to designation or following the conclusion of the Regulation 14 process. I received only a retrospective letter dated 4 April 2025, after key decisions had already been made, demonstrating that proper consultation did not occur.

Given the exceptional nature of this proposal, it is notable that neither the Parish Council nor the wider community sought to engage with me directly at any stage. Consequently, the very low level of participation, the limited representation from Dunsden Green residents, and the absence of direct engagement with myself provide no credible evidence that the designation reflects an informed, representative, or community-wide view.

### 4. Inaccurate assessment of change over time

The Neighbourhood Plan and Character Appraisal state that there has been "little significant change over time" and "no in-depth development found" (NP p.68, 5.13.2, 5.13.4, Appendix 1 p.23). These assertions are incorrect. Recent and cumulative development has materially altered the village setting, including:

- Recent planning consents for 5 new dwellings: one at The Cottage (adjacent) and four at Ivy Cottages to the south-east.
- Extensions to the vast majority of neighbouring properties surrounding the village green.
- Conversions of historic barns and outbuildings to separate dwellings or guest accommodation, notably at Dunsden Farmhouse and the adjacent properties Chapmans Farm and The Cottage.
- The substantial expansion of the former small tap shop brewery into a large public venue, with extensive indoor and outdoor seating for approximately 230 patrons (late 2021), kitchen facilities (2024) and associated car parking (2025). The Character Appraisal itself (Appendix 1 p.23) acknowledges intensified commercial activity and associated congestion.

This clear and ongoing pattern of change has not been properly acknowledged or reflected in the Plan's assessment and undermines the assertion that the character and openness of the settlement have remained largely unchanged.

## 5. Persistent factual inaccuracies within the evidence base

Appendix IV: The Local Green Space Assessment and Matrix (V2, 4 July 2025, pp.6-7, 14, DG-5) continues to contain multiple known factual inaccuracies, which materially undermine its reliability. These inaccuracies were raised repeatedly:

- At both Parish Council and Steering Committee meetings
- In written correspondence to South Oxfordshire District Council, the Parish Council, and local councillors on 6 March 2025 and 8 April 2025, and
- Within the Consultation Statement itself (p.10, 4.3-4.4)

Despite this, the inaccuracies remain uncorrected in the submitted documents.

### 5.1 Incorrect application of NPPF Criterion 1: Proximity to the community

While geographically within the village, the land has no public access or community function and cannot reasonably be regarded as a community serving open space, as it forms part of my private residential garden.

### 5.2 Incorrect application of NPPF Criterion 2: Demonstrably special to the local community

Claims of community significance are unsupported by evidence:

- The land is private and has no historic, recreational, or communal use. The Local Green Space Assessment Matrix (Appendix IV, p.7, DG-5) itself confirms no public access.
- Owner contact is incorrectly recorded as having taken place. No evidence of consultation with, or consent from myself has ever been provided.
- Assertions that the land historically appears part of the village green are incorrect (Appendix IV, p.7, DG-5). This is contradicted by the Plan itself (NP p.68, 5.13.3) which explicitly confirms that the historic village green extended only “up to the public right of way”, adjacent to my property. Title deeds and historic maps also confirm the land has always been physically and functionally separate.
- Claims that retention “reflects the historic open green spaces as shown on a late 19th-century map” are also flawed. Many dwellings historically sat within open land and many continue to retain large private gardens, yet only my garden has been singled out for this designation.

### 5.3 Incorrect application of NPPF Criterion 3: Local in character and not an extensive tract of land

The claim that the “site has defined boundaries” is incorrect.

- The land outlined in red is incorrectly depicted as a separate plot with its own boundary, when in fact it forms part of my residential garden.
- No separate boundary exists either within my title deeds or on the ground, confirming the land forms part of a single, undivided residential garden.
- The red outline has been incorrectly overlaid on the modern map and conflicts with title deeds.

### 5.4 Boundary inconsistencies

The red boundary shown as a Local Green Space in the Assessment (Appendix IV, DG5, p.14) differs in size and extent from the area shown as an ‘Important Open Space’ in the Neighbourhood Plan (shown in green, NP, p. 69, Figure 39). There is no explanation of why this boundary line was altered, how the new boundary was determined, or who made the decision to include only this section of my property.

## 6. Misrepresentation of Planning History

The planning history and characterisation of the property are misleading and inaccurate:

- Refusal reasons did not cite ‘detrimental to the adjacent historic public open space’.
- References to a “recently refused” planning application are incorrect; the application was submitted in 2018-19 and therefore cannot reasonably be regarded as recent.
- Characterisation of the site as a paddock is inaccurate; fencing does not determine land use, and the land has always been used and maintained as a residential garden.
- The photograph of the property used is over 16 years old, is outdated, and materially misrepresents the current layout and appearance of the site.

Historic planning refusals reflect the policy context at the time and do not demonstrate current community value. Any Important Open Space designation should be based on up to date, site specific and verifiable evidence, rather than historic mapping, past planning decisions, or assumed conservation status.

## 7. Strongly Linked to DG-1 and DG-2

Claims of strong links to policies DG-1 (Village Green) and DG-2 (Community Orchard) are unfounded. The land has never formed part of the historic village green, and the community orchard (established circa 2009) has no functional, historical, or physical connection with my property. Furthermore, no evidence has been provided to substantiate claims that the site is valued by the community, ‘as noted by the public.’

## Conclusion

I am firmly opposed to the proposed designation of my garden as an Important Open Space. My property appears to be the only private residential garden within the Neighbourhood Plan area proposed for this designation, and no clear or evidence-based justification has been provided for treating it differently from all other residential gardens. The proposal relies on inaccurate information, unresolved objections, inadequate consultation, and unsupported assertions of community value.

In the absence of meaningful consultation, up-to-date evidence, or a clear policy justification, the designation fails to meet the basic conditions for neighbourhood planning and is inconsistent with national policy.

I therefore reiterate my formal request that my property be removed in its entirety from the Important Open Space designation and from all associated Neighbourhood Plan documentation (site DG-5).


Yours faithfully



Mrs S Riches

# Response 11

## KIDMORE END PARISH COUNCIL

  
Clerk of the Council

0118 947 3130

  
clerk@kepc.info

24 January 2026

Dear Sirs

### **EYE & DUNSDEN NEIGHBOURHOOD PLAN CONSULTATION**

I refer to notices in December 2025 about the consultation on the submitted Eye & Dunsden Neighbourhood Plan. The Plan has been considered by my Council, as this Parish has a common boundary with the Parish of Eye & Dunsden.

In general, the Council supports neighbourhood plans created by neighbouring parishes in South Oxfordshire. The Council's comments on the submitted Pan are set out below.


The Parish of Eye & Dunsden comprises a network of rural fields and hedgerows interspersed with small villages, with the added complication of the River Thames, gravel extraction, a conservation area, traffic congestion caused by commuters using the historical bridge crossing, which only allows single lane crossing, lakes with potential recreational use, and regular flooding.

The Council supports maintaining the rural character of Eye & Dunsden, with policies to improve biodiversity, create and conserve green corridors, ensure separation of settlements, and protect landscape characteristics in the plan area. Aspirations to maintain and improve pedestrian/non-motorised vehicular accessibility between communities should be applauded. Of huge importance would be the implementation of aspirations to improve road safety by redefining roads as quiet lanes and reducing the speed limits in Playhatch, Dunsden Green and Sonning Eye to 20 mph in this rural community.

There is active gravel extraction in the plan area, so policies to actively promote and improve biodiversity in active and former areas of gravel extraction are important. The ecological importance of wetlands for biodiversity is well known. Having policies in place to protect and enhance these habitats is of huge local and national significance. Part of the byproduct of gravel extraction are lakes, so this Council supports policies that balance recreational use of these lakes with nature conservation.

The River Thames, whilst providing amazing landscape characteristics, also poses problems in the plan area, including flooding. This flooding occurs after heavy rain, and

## KIDMORE END PARISH COUNCIL

  
Clerk of the Council

0118 947 3130


  
clerk@kepc.info

this means that there is limited scope for infill in some of the villages because of flooding or the risk of flooding.

The River Thames also means that there are regular (at peak hours) congestion problems in the plan area, due to the presence of an inadequate river crossing in Sonning. Whilst the neighbourhood plan shows routes for an improved river crossing, and states the Local Traffic Objective (f) to remain engaged in working towards a sustainable solution to traffic congestion across the River Thames, including the possibility of a further river crossing, provided it does not have a negative impact on the parish, this Council questions whether a third river crossing would lead to any reduction in local traffic congestion. The Council feels that more modelling and consultations are required, and the submitted neighbourhood plan also supports this. 5.16.5 states that a third crossing could have a fundamental adverse impact on the plan area. There are further congestion problems on other roads in the parish (5.17.3), eg at the junction of the access road (to the lakes) with Henley Road and Caversham Park Road. This junction is at capacity at peak hours, and any increase in use could be detrimental to local people and other road users.

Subject to the above observations, Kidmore End Parish Council supports the submitted Eye & Dunsden Neighbourhood Plan.

Yours faithfully

  
Clerk of the Council

Neighbourhood Planning Team  
South Oxfordshire District Council

By e-mail only

## **Response 12**

### ***Your comments:***

Please see the letter attached.

Please see the attachment with supporting evidence.

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

Please see the attachment with supporting evidence.

### ***Public hearing:***

There have been so many people discussing this plan and the whilst there has been some consultation NO one listens to the contributions.

# HISCOX

# FAMILY

~ Heather ~



26<sup>th</sup> January 2026

Dear Sirs

## EYE AND DUNSDEN NEIGHBOURHOOD DEVELOPMENT PLAN CONSULTATION

### Introduction

We are owners on the land defined in the Eye and Dunsden Neighbourhood Development Plan Regulation 16 Consultation Document as “Sonning Eye SE2 The triangle of land in Sonning Eye alongside the B478 between The Gallery and the Eyot House”.

Please accept this as our formal objection to our land being included as a Local Green Space (LGS) designation under the NPPF. The reasons for this position are defined here in.

Under Regulation 18 or Regulation 19 consultation we submit and demonstrate that the proposed site does not meet the specific criteria outlined in paragraphs 99-103 (2024 version, previously paragraphs 100-101 in the 2021 version) of the Framework and that the designation scoring process is unsound. Key objections are based on NPPF Criteria score mechanism. We submit that the scoring of this parcel of land is incorrect and layout our views below.

We also have asked Savills separately to independently review the designation of our site SE2.

### Local Green Space (LGS) designation Review

We have reviewed in detail the so-called evidence-based assessment of our site and following our critique and using the scoring, the evidence provided and the detailed knowledge of our own land SE2, we respectfully suggest that Bluestone Planning LLP is not correct.

The Bluestone Planning LLP scoring matrix and marking system is detailed in Dunsden Neighbourhood Development Plan. In this SE2 scores are as follows:

- |                            |                |
|----------------------------|----------------|
| 1. Close to proximity      | Score 1        |
| 2. <b>Beauty/Amenity</b>   | <b>Score 4</b> |
| 3. Recreation              | Score 0        |
| 4. Historical              | Score 2        |
| 5. <b>Tranquillity</b>     | <b>Score 3</b> |
| 6. <b>Wildlife</b>         | <b>Score 2</b> |
| 7. Extensive Tract of Land | Score 1        |
| 8. Ownership Aware         | Score -        |
| 9. Site Allocation         | Score 1        |
| 10. Public Access          | Score 0        |

The addition of these scores is 14 or 51%. The report suggests that this scoring a considerably higher than the 50% designation rule. Only 1% difference. Even without our critique one should question if the criteria are morally achieved to be include in LGS.

## Elements of the Local Green Space (LGS) SE2 Matrix we disagree with and why

### Beauty

- **Our score = 2: NPPF Score = 4**
- Bluestone Planning define this as 4. Almost a top score.
- No evidence is provided to justify the NPPF score of 4. The score regime for the two options are as follows:
  - a. Score 4. Very good visual attractiveness, good variety of natural features and of good quality, provides a very good contribution to the setting of the local area
  - b. Score 2. Good visual attractiveness, limited variety of natural features and of good quality, provides a good contribution to the setting of the local area
- We contend that this is **not** score 4 of **Very good visual attractiveness** or provides a good variety of natural features. It is a field of common grass and hedge rows – not even good ones – made up of common Hazel, Hawthorn, Stinging Nettles, weed, and few wild Tree.
- Moreover, SE2 is a common score 2 as Good visual attractiveness, limited variety of natural features. Limited features. There is no evidence of good and good quality variety of natural features.

### Tranquillity

- **Our Score = 1 NPPF Score = 3**
- 
- Our Tranquillity scoring of 1 comes from SE2 being completely surrounded by Roads which creates very high level of disturbance, mainly caused by the B478 road.
- The B478, despite being classified as a B road (mainly due to its history and width) is a very busy highway with circa **13600 annual Average Daily Traffic AADT** flow as defined on the Oxfordshire Gov Portal Table A – Ref CP74. A key road over the river Thames and hence the traffic flow.
- [https://portal.oxfordshire.gov.uk/content/publicnet/council\\_services/roads\\_transport/traffic/traffic\\_monitoring/data-summaries/TableAannualaveragedailytraffic.pdf](https://portal.oxfordshire.gov.uk/content/publicnet/council_services/roads_transport/traffic/traffic_monitoring/data-summaries/TableAannualaveragedailytraffic.pdf)
- 13600 (some reports suggest even 16,000) cars per day is higher in traffic flow than most major A roads in Oxfordshire.
- As such we justify a score of 1 as Frequent Disturbance constantly 24/7 from B478 a very busy road with major main road traffic capacity.
- Constant traffic congestion with car fumes and noise is hardly tranquil.

### Wildlife

- **Our Score = 1 NPPF Score = 3**
- No evidence is provided to justify Score 3.
- We live on site. Walk our Dogs on the site often especially during the flooding season and no evidence to justify the score.
- The very busy B478 scares off or kills almost all wildlife locally.
- Our score of 1 seems justified.

### Scoring Conclusion

1. Close to proximity	Score 1
<b>2. Beauty/Amenity</b>	<b>Score 2</b>
3. Recreation	Score 0
4. Historical	Score 2
<b>5. Tranquillity</b>	<b>Score 1</b>
<b>6. Wildlife</b>	<b>Score 1</b>
7. Extensive Tract of Land	Score 1
8. Ownership Aware	Score -
9. Site Allocation	Score 1
10. Public Access	Score 0

The addition of these scores is 9 or 33% suggesting that this scoring a considerably lower than the 50% designation rule.

We propose that the "NPPF Criteria 2: The design should only be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife" **as defined is not met.**

We submit that:

**SE2 does not meet the criteria to be a Neighbourhood Plan Local Green Space (NPPF), the assessment scoring matrix that in our opinion does not satisfy the NPPF criteria for designation as a Local Green Space. We would ask that the Examiner removes the proposed Local Green Space designation from this proposal.**

**Yours Faithfully**

A large black rectangular redaction box covering the signature area.A smaller black rectangular redaction box covering contact information.

## Response 13

### ***Your comments:***

We are owners on the land defined in the Eye and Dunsden Neighbourhood Development Plan Regulation 16 Consultation Document as "Sonning Eye SE2 The triangle of land in Sonning Eye alongside the B478 between The Gallery and the Eyot House".

We have reviewed in detail the so-called evidence-based assessment of our site and following our critique and using the scoring, the evidence provided and the detailed knowledge of our own land SE2, we respectfully suggest that Bluestone Planning LLP is not correct.

The current scores is 14 or 51%. The report suggests that this scoring a considerably higher than the 50% designation rule. Only 1% difference. Even without our critique one should question if the criteria are morally achieved to be include in LGS.

We propose that the "NPPF Criteria 2: The design should only be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife" as defined is not met.

We submit that:

SE2 does not meet the criteria to be a Neighbourhood Plan Local Green Space (NPPF), the assessment scoring matrix that in our opinion does not satisfy the NPPF criteria for designation as a Local Green Space. We would ask that the Examiner removes the proposed Local Green Space designation from this proposal.

Please see the attachment with supporting evidence.

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

Elements of the Local Green Space (LGS) SE2 Matrix we disagree with and why

Beauty

- Our score = 2: NPPF Score = 4
- Bluestone Planning define this as 4. Almost a top score.
- No evidence is provided to justify the NPPF score of 4. The score regime for the two options are as follows:

- a. Score 4. Very good visual attractiveness, good variety of natural features and of good quality, provides a very good contribution to the setting of the local area
- b. Score 2. Good visual attractiveness, limited variety of natural features and of good quality, provides a good contribution to the setting of the local area
- We contend that this is not score 4 of Very good visual attractiveness or provides a good variety of natural features. It is a field of common grass and hedge rows – not even good ones – made up of common Hazel, Hawthorn, Stinging Nettles, weed, and few wild Tree.
- Moreover, SE2 is a common score 2 as Good visual attractiveness, limited variety of natural features. Limited features. There is no evidence of good and good quality variety of natural features.

### Tranquillity

- Our Score = 1 NPPF Score = 3
- 
- Our Tranquillity scoring of 1 comes from SE2 being completely surrounded by Roads which creates very high level of disturbance, mainly caused by the B478 road.
- The B478, despite being classified as a B road (mainly due to its history and width) is a very busy highway with circa 13600 annual Average Daily Traffic AADT flow as defined on the Oxfordshire Gov Portal Table A – Ref CP74. A key road over the river Thames and hence the traffic flow.
- 
- [https://portal.oxfordshire.gov.uk/content/publicnet/council\\_services/roads\\_transport/traffic/traffic\\_monitoring/data-summaries/TableAannualaveragedailytraffic.pdf](https://portal.oxfordshire.gov.uk/content/publicnet/council_services/roads_transport/traffic/traffic_monitoring/data-summaries/TableAannualaveragedailytraffic.pdf)
- 13600 (some reports suggest even 16,000) cars per day is higher in traffic flow than most major A roads in Oxfordshire.
- As such we justify a score of 1 as Frequent Disturbance constantly 24/7 from B478 a very busy road with major main road traffic capacity.
- Constant traffic congestion with car fumes and noise is hardly tranquil.

### Wildlife

- Our Score = 1 NPPF Score = 3
- No evidence is provided to justify Score 3.
- We live on site. Walk our Dogs on the site often especially during the flooding season and no evidence to justify the score.
- The very busy B478 scares off or kills almost all wildlife locally.
- Our score of 1 seems justified.

Please see the attachment with supporting evidence.

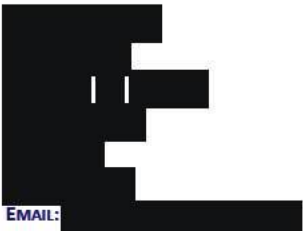
**Public hearing:**

There is so much wrong with this plan.

# HISCOX

# FAMILY

Martin [REDACTED]



26<sup>th</sup> January 2026

Dear Sirs

## EYE AND DUNSDEN NEIGHBOURHOOD DEVELOPMENT PLAN CONSULTATION

### Introduction

We are owners on the land defined in the Eye and Dunsden Neighbourhood Development Plan Regulation 16 Consultation Document as “Sonning Eye SE2 The triangle of land in Sonning Eye alongside the B478 between The Gallery and the Eyot House”.

Please accept this as our formal objection to our land being included as a Local Green Space (LGS) designation under the NPPF. The reasons for this position are defined here in.

Under Regulation 18 or Regulation 19 consultation we submit and demonstrate that the proposed site does not meet the specific criteria outlined in paragraphs 99-103 (2024 version, previously paragraphs 100-101 in the 2021 version) of the Framework and that the designation scoring process is unsound. Key objections are based on NPPF Criteria score mechanism. We submit that the scoring of this parcel of land is incorrect and layout our views below.

We also have asked Savills separately to independently review the designation of our site SE2.

### Local Green Space (LGS) designation Review

We have reviewed in detail the so-called evidence-based assessment of our site and following our critique and using the scoring, the evidence provided and the detailed knowledge of our own land SE2, we respectfully suggest that Bluestone Planning LLP is not correct.

The Bluestone Planning LLP scoring matrix and marking system is detailed in Dunsden Neighbourhood Development Plan. In this SE2 scores are as follows:

- |                            |                |
|----------------------------|----------------|
| 1. Close to proximity      | Score 1        |
| 2. <b>Beauty/Amenity</b>   | <b>Score 4</b> |
| 3. Recreation              | Score 0        |
| 4. Historical              | Score 2        |
| 5. <b>Tranquillity</b>     | <b>Score 3</b> |
| 6. <b>Wildlife</b>         | <b>Score 2</b> |
| 7. Extensive Tract of Land | Score 1        |
| 8. Ownership Aware         | Score -        |
| 9. Site Allocation         | Score 1        |
| 10. Public Access          | Score 0        |

The addition of these scores is 14 or 51%. The report suggests that this scoring a considerably higher than the 50% designation rule. Only 1% difference. Even without our critique one should question if the criteria are morally achieved to be include in LGS.

## Elements of the Local Green Space (LGS) SE2 Matrix we disagree with and why

### Beauty

- **Our score = 2: NPPF Score = 4**
- Bluestone Planning define this as 4. Almost a top score.
- No evidence is provided to justify the NPPF score of 4. The score regime for the two options are as follows:
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- We contend that this is **not** score 4 of **Very good visual attractiveness** or provides a good variety of natural features. It is a field of common grass and hedge rows – not even good ones – made up of common Hazel, Hawthorn, Stinging Nettles, weed, and few wild Tree.
- Moreover, SE2 is a common score 2 as Good visual attractiveness, limited variety of natural features. Limited features. There is no evidence of good and good quality variety of natural features.

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- **Our Score = 1 NPPF Score = 3**
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- Our Tranquillity scoring of 1 comes from SE2 being completely surrounded by Roads which creates very high level of disturbance, mainly caused by the B478 road.
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### Wildlife

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- We live on site. Walk our Dogs on the site often especially during the flooding season and no evidence to justify the score.
- The very busy B478 scares off or kills almost all wildlife locally.
- Our score of 1 seems justified.

### Scoring Conclusion

1. Close to proximity	Score 1
<b>2. Beauty/Amenity</b>	<b>Score 2</b>
3. Recreation	Score 0
4. Historical	Score 2
<b>5. Tranquillity</b>	<b>Score 1</b>
<b>6. Wildlife</b>	<b>Score 1</b>
7. Extensive Tract of Land	Score 1
8. Ownership Aware	Score -
9. Site Allocation	Score 1
10. Public Access	Score 0

The addition of these scores is 9 or 33% suggesting that this scoring a considerably lower than the 50% designation rule.

We propose that the "NPPF Criteria 2: The design should only be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife" **as defined is not met.**

We submit that:

**SE2 does not meet the criteria to be a Neighbourhood Plan Local Green Space (NPPF), the assessment scoring matrix that in our opinion does not satisfy the NPPF criteria for designation as a Local Green Space. We would ask that the Examiner removes the proposed Local Green Space designation from this proposal.**

Yours Faithfully

A large black rectangular redaction box covering the signature area.A smaller black rectangular redaction box covering the name of the signatory.



Eye and Dunsden  
Neighbourhood Development Plan

**Regulation 16 Consultation**

January 2026



[gladman.co.uk](http://gladman.co.uk)



01260 288888

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## **Appendices**

**Appendix 1** – Peer Review of the Eye & Dunsden Parish Landscape Character Assessment and Proposal for a Local Valued Landscape

# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 These representations provide Gladman Developments Ltd (Gladman's) response to the Eye and Dunsden Neighbourhood Plan (E&DNP) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012. It follows our earlier submissions at the Regulation 14 stage of the E&DNP's preparation.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations.
- 1.1.3 Through these representations, Gladman provides an analysis of the E&DNP, and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the E&DNP suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.
- 1.1.4 As the Neighbourhood Plan Steering Group are likely to be aware, Gladman are promoting land on the North East of Reading for development within the neighbourhood plan area.

## 2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

### 2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the E&DNP must meet are as follows:

*“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*

*(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*

*(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*

*(d) The making of the order contributes to the achievement of sustainable development.*

*(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*

*(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

*(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”*

2.1.2 The Town and Country Planning Act 1990 (as amended), states that there is a general rule that neighbourhood plan examinations should be conducted via written

representations, other than where an Examiner considers a hearing would be necessary to allow for adequate examination to allow for a fair chance to put a case.

- 2.1.3 Gladman considers that this Neighbourhood Plan should be examined in public. The strategic location of the plan area has not been taken into account during the plan's preparation. The background documents submitted as part of the plan are not considered to be robust. Throughout this representation a number of outstanding issues have been raised and it is considered that it would be suitable for the E&DNP to be examined in a public hearing, rather than by written representations, to provide a fair and appropriate opportunity for these concerns to be examined and heard.

## 2.2 National Planning Policy Framework

- 2.2.1 On the 12th of December 2024 the new Labour Government adopted its proposed reforms to the National Planning Policy Framework. The revisions include reversing changes introduced by the previous December 2023 iteration and the introduction of new policies.
- 2.2.2 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of Neighbourhood Plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.
- 2.2.3 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet identified housing needs. This requirement is applicable to Neighbourhood Plans.
- 2.2.4 Planning Practice Guidance (PPG) makes clear that Neighbourhood Plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that the Parish Council can assist South Oxfordshire District

Council (the Council) in delivering sustainable development and be in accordance with basic condition (d).

**2.2.5** The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing Neighbourhood Plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

**2.2.6** Paragraph 30 further makes clear that Neighbourhood Plans have the power to shape, direct and help deliver sustainable development. It is also stated that Neighbourhood Plans should not promote less development than what is set out in the strategic policies for the area or undermine those strategic policies.

## **2.3** Planning Practice Guidance

**2.3.1** It is clear from the requirements in the Framework that Neighbourhood Plan policies should be prepared in general conformity with strategic requirements for the wider areas, as confirmed in an adopted development plan. The requirements set out in the Framework adopted in 2023 have been supplemented by the publication of Planning Practice Guidance (PPG).

**2.3.2** The PPG emphasises the importance of supporting strategic policies as stated below;

*“The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies.”*

**2.3.3** Accordingly, the E&DNP will need to ensure that it considers the latest guidance issued by the SoS so that it can be found to meet basic condition (a).

## 3 RELATIONSHIP TO LOCAL PLANS

### 3.1 Adopted Development Plan

3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, Neighbourhood Plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

3.1.2 The adopted Development Plan relevant to the preparation of the E&DNP and the Development Plan which the E&DNP will be tested against is the South Oxfordshire Local Plan 2011-2035. The Plan was adopted in December 2020 and is currently the overarching planning policy document for the Borough and forms the basis for the decision making process in relation to all planning applications looking forward to 2035, or such a time as it, or elements of it are superseded.

### 3.2 Emerging Development Plan

3.2.1 The E&DNP should also have regard to the emerging strategic framework outlined in the South Oxfordshire & Vale of White Horse Joint Local Plan 2041. The current Local Development Scheme (LDS) sets out a timetable for the preparation of the joint plan and signals the intended replacement of the current South Oxfordshire Local Plan 2035 once adopted.

3.2.2 The Joint Local Plan has progressed through several formal stages: public consultation on Issues and Scope (Regulation 18) in May – June 2022, on Preferred Options (Regulation 18) in January – February 2024, and the Pre – Submission Publication (Regulation 19) consultation took place 1<sup>st</sup> October – 12<sup>th</sup> November 2024. Subsequently, the plan was submitted to the Secretary of State for independent examination on the 9<sup>th</sup> December 2024. The adoption of the South Oxfordshire & Vale of White Horse Joint Local Plan 2041 was expected in December 2025 as per the LDS; following the publication of the Inspectors' Interim Findings, however, the schedule has been delayed.

- 
- 3.2.3** At the present time, the outcome of the emerging Local Plan is currently unknown, with the possibility that a different strategy to that currently being promoted by SODC will be required moving forward. There are a vast number of outstanding objections to the plan, with the Inspectors previously recommending the plan to be withdrawn.
- 3.2.4** Matters have recently moved on since the publication of the Inspectors' Interim Findings, linked to the 28<sup>th</sup> November 2025 Written Ministerial Statement (WMS) concerning the application of the Duty to Cooperate in plan-making. However, this does not change the fact regarding the outstanding objections to the emerging Joint Local Plan, and until such time that there is greater clarity over this process, it could be premature to advance Neighbourhood Plans that may have a limited shelf-life or contain policies that are quickly superseded.

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## 4 EYE AND DUNSDEN NEIGHBOURHOOD PLAN

### 4.1 Introduction

4.1.1 This section of the representations has been drafted to respond to the E&DNP consultation document and its supporting evidence base.

### 4.2 Strategic Environmental Assessment (SEA)

4.2.1 The evidence base for the draft plan includes an initial Strategic Environmental Assessment and a Habitats Regulations Assessment Screening Opinion which concluded that The Eye and Dunsden NDP is unlikely to have significant effects on Natura 2000 sites, nor have a significant effect on the environment, therefore, does not require a Strategic Environmental Assessment.

4.2.1 The SEA is a legal requirement involving a systematic process that should be undertaken at each stage of a plan's preparation. It should assess the effects of a neighbourhood plan's proposals and whether they would be likely to have significant environmental effects and whether the plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.

4.2.2 The draft E&DNP does not allocate any sites for development, however given the strategic location of the neighbourhood plan area, we submit that more options for the delivery of development should have been considered, taking account of this contextual position. Gladman considers that it would have been appropriate to undertake an SEA to assess these alternative strategies.

### 4.3 Contents Page

4.3.1 As an initial observation, to aid a reader of the E&DNP, we suggest that it may be helpful to provide an index of policy references/numbers alongside the documents' contents page. This could simply be achieved by adding the policy references to existing contents table rather than creating a standalone table.

## 4.4 Vision and Objectives

4.4.1 The Neighbourhood's Plan's Vision seeks to 'To address the climate emergency and loss of natural environment by maintaining and enhancing the rural character, environment and landscape of the parish; to maintain and improve pedestrian/non-motorised vehicular accessibility between communities and into the surrounding countryside while supporting sustainable development that is of an appropriate scale, character and design to the benefit of the local community.'

4.4.2 Whilst acknowledging these intentions, as will be articulated through the remainder of these representations, we are concerned that the Neighbourhood Plan does not strike an appropriate balance on the delivery of sustainable development.

4.4.3 We are concerned that it is not positively prepared, and whilst seeking to maintain and enhance the landscape character of the parish, we believe it is seeking to introduce policies that are overly restrictive and are not sufficiently evidenced in this regard.

## 4.5 Policy ED-VL1 – Landscape Character and Valued Landscapes

4.5.1 Gladman object to the designation of the E&DNP area as a valued landscape in its entirety. We do not believe this designation is appropriate or reflective of the area's landscape value; moreover, we are concerned that it appears to be an attempt to restrict development across the Parish, despite only a small part of the North-Western parcel falling within the National Landscape, formerly known as Chilterns Area of Outstanding Natural Beauty (AONB).

4.5.2 The E&DNP provides a useful summary of how the Parish was afforded an 'Area of Great Landscape Value' - as set out within South Oxfordshire District Council Rural Areas Local Plan 1992. The designation dates to the 1954 County Development Plan, however it no longer exists in the current Local Plan. National policy now does not support policies which are blanket landscape policies which seek to restrict development.

- 4.5.3 In order to be classified as valued landscape, a specific landscape must demonstrate clear physical attributes that highlight its significance and which 'take it out of the ordinary'. Although the E&DNP states "*Whilst this designation (Area of Great Landscape Value) no longer exists in the current Local Plan, it is considered by the community that little has changed in this time in relation to the quality of this landscape*", it should be noted that national planning policy and guidance has changed.
- 4.5.4 Fundamentally, Gladman does not believe that Policy ED-VL1 has been appropriately or correctly evidenced. In this regard, consultants Randall Thorp have been commissioned to undertake an independent peer-review of the Eye & Dunsden 'Landscape Character Assessment and Proposal for a Local Valued Landscape' (PCLA) that has been used to "*inform the emerging policies in the Neighbourhood Plan to identify the value of the landscape and recommend areas which constitute a Local Valued Landscape*"<sup>1</sup>
- 4.5.5 Randall Thorp's review is provided at Appendix 1 to these submissions and identifies a number of important shortcomings in the PCLA's methodology and findings, which are summarised within its Executive Summary. These lead to the Peer Review to conclude that the inclusion of all land within the Eye & Dunsden parish area is not an accurate or robust conclusion, and that the PCLA does not follow/correctly apply current guidance, is not based on a transparent methodology, and demonstrates that the identification of 'valued landscapes' has been overused.
- 4.5.6 As outlined above, to be deemed a 'valued landscape', a landscape must exhibit attributes that would 'take it out of the ordinary'. This is opposed to designating vast swathes of land which may not have any landscape significance and are based solely on community support. In this regard, Policy ED-VL1 would appear to be a blanket policy which is preventing development through the whole Parish, this is not in accordance with the NPPF.

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<sup>1</sup> PCLA paragraph 1.1

4.5.7 Gladman submit that Policy ED-VL1 must be reviewed and would recommend removal of the policy. Randall Thorp's Peer Review has identified a number of significant shortcomings in the approach that has been taken when preparing its proposals and blanket Valued Landscape designations.

4.5.8 Of the designations proposed with Policy ED-VL1, the Peer Review finds that only PLCA1 and PLCA2 would be capable of constituting a Valued Landscape and be befitting of this term. We submit that the remainder of the policy's proposed Valued Landscape designations have not been shown to meet this definition, based on the Peer Review's findings.

## 4.6 Policy ED-VL2 – Important Views

4.6.1 The evidence base underpinning this policy has also been reviewed by Randall Thorp, and we would signpost to their findings in this regard. As a result of Randall Thorp's assessment, Gladman challenge the credibility of the suite of 'Important Views' identified in Figure 21 of E&DNP and which this policy seeks to introduce.

4.6.2 We would also highlight that as presently drafted the policy seems to incorrectly assign the views for PLCA3A and 3B. Figure 21 identifies PLCA3A's Key Views as:

1. *To the south dry valley and far wooded horizons wooded edge to Caversham to west*
2. *To the west Milestone Wood, to the south far wooded horizons*
3. *Partly enclosed with views to the west: Milestone Wood and to the east open arable landscape*
4. *From the A4155 view north up to undeveloped ridgeline*

4.6.3 However, Gladman note that none of said Key Views identified for PLCA3A within Figure 21 align with those identified in Policy wording. Instead, Policy ED-VL2 suggests that the PLCA3A Key Views are:

1. *View from the AONB across to the west*

2. *View from within the AONB across to the east*

3. *View from the edge of the AONB across to the east and west*

4. *Elevated view across to Caversham woods to the west, Comp Wood to the east*

5. *View to the east towards Dunsden church, the Grade II\* Row Lane Farmhouse and to far horizons*

4.5.3 This does seem to be a typographical error and needs to be amended to ensure the policy is correct. This is notwithstanding that we do not believe the policy's suite of Important Views, including a number of the viewpoints identified for PCLA3A and 3B, have been adequately evidence and fulfil this role.

4.6.4 Based on Randall Thorp's assessment, the viewpoints need to be considered and reviewed for whether they are important views. This policy again seems to restrict development, across the whole of the parish. Important views should be restricted to those which have importance. Views to the National Landscape, heritage assets and along public rights of way should be considered.

## 4.7 Policy ED-VL4 – Separation of Settlements

4.7.1 Gladman do not believe that it appropriate introduce the concept of separation areas between settlements, as proposed by Policy ED-VL4. Whilst we support the general principle of requiring development proposals to "*...preserve or enhance the features which positively define the character of the Parish*", we believe this can be achieved by alternative means/could in principle function as a standalone policy requirement without requiring the use of a separation-style designation to support it.

4.7.2 The identified green gaps/separation areas seeks to restrict in many directions, notably growth of any form between:

- Playhatch and Caversham Park Village
- Littlestead Green and Caversham Park Village

- Emmer Green and Dunsden Green

4.7.3 The proposed green gaps/separation areas appear to add to the Neighbourhood Plan's suite of restrictive policies. We are also concerned that the requirements of this policy again fail to recognise the urban area of Reading, and the strategic importance Reading plays within the area, and the needs of Reading. Reading Borough Council has acknowledged that it may have un-met housing needs in the future.

4.7.4 Gladman believe that the E&DNP should be supportive of sensitive development across the NP area given its strategic location and should consider how careful design can benefit local places, as defined in Paragraphs 131-141 of the NPPF. However, it is important to note that carefully designed development proposals and other design tools can readily ensure the settlement identities can be maintained in tandem with development proposals where this is necessary.

#### 4.8 Policy ED-BG1 – Biodiversity

4.8.1 Gladman are supportive of overarching principle of requiring development proposals to be in accordance with biodiversity protection as noted within paragraphs 192-195 of the NPPF.

4.8.2 However, as currently drafted, Gladman do not support the provision of 20% biodiversity net gain to be provided on-site or within the Parish, as this policy would require. The Environment Act 2021 requires developments to provide 10% biodiversity net gain and provides a clear, national, standardised approach to this subject.

4.8.3 The evidence base documents which support the E&DNP do not provide any justification as to why a higher percentage should be required. The Biodiversity Reports (Appendix VI of the E&DNP), do not provide any justification or comment on the biodiversity net gain aspect of this policy. Consideration should be given to the viability impact this would have on developments, alongside the potential to provide biodiversity net gain with the Parish. There is no acknowledgement of potential sites

that would be able to provide the biodiversity net gain credits in the Parish. This policy needs to be reviewed and the legal requirement of 10% should remain.

**4.8.4** We further note that the first part of Policy ED-BG11 refers to 'the maintenance and creation of wildlife corridors', with paragraph 3/bullet 3 of the policy also stating that as part of any proposals, consideration should be given to the green corridors identified in the TVERC Green Corridor Study (provided at Appendix V to the E&DNP), both existing and proposed.

**4.8.5** In this respect, we note that the 'Green Corridors Final Map' within the above Study identifies a series of sizeable existing/proposed green corridor annotations. Whilst having no objection to the requirement to respect green corridors, we would object to a prescriptive requirement for this to be guided by the footprint of the above annotations.

**4.8.6** The provision of green corridors/habitat connectivity can be achieved in a number of different ways; in this regard, we submit that the annotations should be used as guide for decision-making, to highlight that consideration should be given to habitat connectivity in these areas, and that this should be made clear within the policy.

**4.8.7** Finally, we would highlight that any proposals submitted to the Council in respect of Gladman's land interests at North East Reading would ensure that the Blackhouse Wood Local Wildlife Site (LWS) and the area of Ancient Woodland directly south would have a sufficient buffer in line with local policy. This could be implemented in the form of a green corridor to ensure little to no disturbance of its associated root zones and soil composition.

## **4.9** Policy ED-BG2 – Trees and Hedgerows

**4.9.1** Gladman note that the provisions for the protection of Trees and Hedgerows within this policy align with the same general principles as those commented on in Policy ED-BG1 – Biodiversity. Again, we would highlight that any development proposals for the North East Reading site would provide suitable treatment of any relevant arboricultural features.

## 4.10 Policy ED-FR1 – Flooding and Drainage

- 4.10.1** With reference to Figure 32 of the Neighbourhood Plan, Gladman would critique the areas shown as being subject to 'High Risk of Surface Water Flooding' to the South of Playhatch and North of Henley Road. When looking at the most recent Flood Maps for Planning produced by the Government, these areas would be predominantly subject to surface water flooding with an annual likelihood of 1 in 1,000, with only limited isolated pockets of medium to high surface water flooding. Gladman would therefore consider this area to be a low-risk flood zone on this basis.
- 4.10.2** When considering flood risk, it should be assessed that an annual likelihood of 1 in 30 is of higher risk than that of 1 in 1,000 is low risk, and when assessing from this perspective, it is clear that the risk of surface water flooding in the area significantly decreases when compared to that currently depicted/referenced within the Neighbourhood Plan.
- 4.10.3** Within the background paper, Flooding Reports (Appending VIII of the E&DNP), this shows mapping that is not the most up to date EA mapping data. This should be considered to be updated to ensure the most up to date flood modelling data is used.
- 4.10.4** In respect of other elements of this policy, Gladman support that developments must adhere to LLFA Standards (subject to these being in accordance with national/industry standards on the use of Sustainable Urban Drainage System (SuDS) features). Again, we would highlight that the use of Sustainable Drainage Systems could be implemented to mitigate any surface water flooding associated with the development of the North East Reading site.

## 4.11 Policy ED-DH1 – General Design Principles & Code

- 4.11.1** While the principle of applying general design principles and codes is agreed with, we would submit that these should not be overly prescriptive/should be applied as a broad guide and must allow for flexibility such that development proposals can respond to site specific considerations.

4.11.2 We are also concerned that some of the proposed design provisions are not consistent with the expectations of national policy, such as the requirement to deliver new development at a density of between 6 – 12 dwellings per hectare (dph) and provide gaps of 10m between properties, which may not make for the efficient use of land.

4.11.3 In this regard, we are also concerned that the E&DNP's design requirements do not sufficiently take account of the wider context beyond the Parish and its relationship to the settlement boundary of Reading and the suburb of Caversham, with the character of these areas appearing to be overlooked within this policy and background evidence.

## 4.12 Policy ED-DH2 – Heritage

4.12.1 Gladman are generally supportive of this policy's intentions in respect of designated and non-designated heritage assets and listed buildings, as shown in Figures 40-42.

4.12.2 However, it is important that the policy also allows for the delivery of carefully designed development proposals. In this respect, it may be appropriate for the first element of the policy in respect of designated heritage assets to also reference the requirements of the NPPF in relation to the treatment of harm and how this should be approached in decision-making.

## 4.13 Policy ED-H1 – Housing Development

4.13.1 In terms of housing development, Gladman consider that it is vital that Eye and Dunsden play a role in contributing to the housing need of the wider South Oxfordshire area. At current the Council claim a 4.46-year housing land supply (December 2025) and claim a shortfall of 696 dwellings against meeting their housing need figure in full.

4.13.2 The Parish is located on the urban edge of Reading, which is an important regional service centre, also fulfilling this role in the context of South Oxfordshire. The edge of Caversham would be a logical extension in which to deliver further residential

development that would both serve Reading and contribute to South Oxfordshire's needs, whilst also allowing for the delivery of Reading BC's highway aspirations of Park and Ride schemes. This noting that Reading BC are likely to have unmet housing needs in the future.

- 4.13.3 Gladman consider that the E&DNP should allow for future housing growth on the edge of Reading. By failing to do so, the Neighbourhood Plan could act as a barrier to the delivery of sustainable development. The growth of Reading could be seen as a strategic matter, and therefore mechanisms for this to happen should be considered in the E&DNP.

#### 4.14 Policy ED-CI1 – Transport and Highways

- 4.14.1 Policy ED-CI1 states that delivery of sustainable modes of transport will be supported. Reading Borough Council have identified through their emerging Local Plan, the aspiration for Park and Ride mobility hubs, of which one would be based on Henley Road on the northern approach to Reading.
- 4.14.2 The E&DNP should acknowledge these aspirations, as a park and ride mobility hub would support the aspiration of the policy.

#### 4.15 Policy ED-CI2 – Quiet Lanes

- 4.15.1 Gladman question whether the requirements of this policy are appropriate. As identified in detail throughout Policy-CI1, the Neighbourhood Plan Steering Group are concerned with traffic issues within the E&DNP area. Implementing a policy that could restrict the use of certain routes could, in principle, serve to exacerbate this situation.
- 4.15.2 Moreover, we believe again that the Neighbourhood Plan must not disregard it's geographic and strategic location adjacent to a significant economic and employment hub, and this should be recognised/factored into the drafting of the Neighbourhood Plan's policies, including Policy ED-CI2.

## 4.16 Policy ED-CI3 – Public Rights of Way

- 4.16.1** Gladman support the existing Public Rights of Way defined in Figures 27 and 46. Furthermore, we note that any development within the Neighbourhood Plan Area could support any existing Public Right of Way networks with a view to improving and creating a better-connected network of walking routes for local communities

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## 5 CONCLUSIONS

### 5.1 Summary

5.1.1 Gladman welcomes the opportunity to comment on the Eye and Dunsden Neighbourhood Plan Submission Draft. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2024) and the associated updates that were made to Planning Practice Guidance.

5.1.2 As drafted, Gladman have provided comments on several issues connected to the Neighbourhood Plan's policies, their requirements and supporting evidence base. In particular, we are concerned that the application of Policy ED-VL2 could result in a blanket restriction on development within the plan area without adequate justification. We request that the matters raised through our submissions are carefully considered by the Neighbourhood Plan Steering Group, the Council and via the Neighbourhood Plan Examination process.

5.1.3 Gladman consider it important that the Eye and Dunsden Neighbourhood Plan allows for strategic development to come forward given the Parish's strategic location on the edge of Reading's urban area.

5.1.4 Furthermore, we respectfully ask that the Examination is undertaken through a public hearing, Gladman believes that the background evidence is not robust and would require a thorough examination on the points raised within this representation.

5.1.5 We hope you have found these representations informative and useful towards the preparation of the Plan and Gladman welcome any future engagement with the Council to discuss the considerations within the submitted documents.

**Appendix 1:** Peer Review of the Eye & Dunsden Parish Landscape Assessment and Proposal for a Local Valued Landscape



# Peer Review

Of

Eye & Dunsden Parish  
Landscape Character Assessment  
And Proposal for a  
Local Valued Landscape

For



January 2026





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**Figure 4:** Proposed Local Landscape Character Areas (LLCA)

## Appendices

<b>Appendix A</b>	Photographs of Key views identified in the Eye & Dunsden Parish Landscape Character Assessment
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# 1. Introduction

- 1.1. This Peer Review has been prepared by Dick Longdin (FLI) of Randall Thorp on behalf of Gladman Developments. Its purpose is to consider the methodology and conclusions of the '**Eye & Dunsden Parish Landscape Character Assessment and Proposal for a Local Valued Landscape**' (Draft x 12: 26<sup>th</sup> April 2022) (PLCA) and consider its appropriateness and robustness as a piece of work to '*inform the emerging policies in the Neighbourhood Plan to identify the value of the landscape and recommend areas which constitute a Local Valued Landscape*' (PLCA para 1.1).
- 1.2. A Review was originally prepared in January 2024 to inform representations to the 2023 pre-submission draft **Eye and Dunsden Neighbourhood plan**. It has since been reviewed and updated in January 2026 to inform representations as part of the regulation 16 consultation, as now presented in this document.
- 1.3. The PLCA is the key evidence base for the **Eye and Dunsden Neighbourhood Plan** -Submission draft (Aug 2025) policy ED-VL1 (Landscape Character and Valued Landscapes) and ED-VL2 (Important Views). The purpose of ED-VL1 is to identify landscapes that have the designation of 'Valued landscapes' in terms of NPPF (Dec 2024) para 187a.
- 1.4. This Review concentrates on those areas of the PLCA that consider landscape value and could be seen to suggest that a 'Local Valued Landscape' may equate to 'Valued Landscape' in terms of NPPF para 187a.
- 1.5. Site visits were carried out in July 2022 as part of earlier work. A site visit specific to the assessments provided in this Review was carried out by the author on 5<sup>th</sup> January 2024. Although the ground was wet, weather conditions on the day were dry with clear skies and good views.
- 1.6. This Review includes its own assessment of landscape value within the Parish, based on published guidance.
- 1.7. The Chilterns National Landscape is within the study area. It was formally known as The Chilterns AONB. Throughout this Review it is referred to as the Chilterns AONB (or AONB) to keep its naming consistent with that in other documents referred to, and so avoid confusion.

## Structure of the Review

- 1.8. In order to properly review the PLCA, it is necessary to understand what is meant by Landscape Character Assessment, landscape value and 'Valued Landscapes' and what guidance is available to assess and make judgements about these. It is then possible to review the PLCA to assess if it follows published guidance and hence determine whether its findings are robust.
- 1.9. The PLCA pre-dates the '**Local Landscape Designation Review of South Oxfordshire and Vale of White Horse**' (Final report Prepared by LUC September 2024) (LLDR'24). The PLCA states in para 1.4 that it builds on the **South Oxfordshire Landscape Character Assessment 2017 (SOLCA'17)** (amongst others). In para 4.2 it states that SOLCA'17 reflects much of ... the 2003 study (**South Oxfordshire Landscape Character Assessment 2003**

[SOLCA'03]). This review also comments on the findings of these two earlier assessments that the PLCA 'builds on' and references the later LLDR'24.

1.10. This review is structured as follows:

- Published guidance on (and the meaning of) Local Landscape Areas for designation, Landscape Character Assessment, Landscape value and 'Valued Landscapes'
- Review of SOLCA'03 and SOLCA'17.
- Review of the PLCA.
- Assessment of landscape value within the Parish, based on published guidance.
- Conclusions

## Background documents

1.11. The following documents have been studied as part of this review:

- **National Planning Policy Framework** (Dec 2024) (NPPF)
- **Eye & Dunsden Parish Landscape Character Assessment and Proposal for a Local Valued Landscape** (Draft x 12: 26<sup>th</sup> April 2022) (PLCA).
- **Eye & Dunsden Neighbourhood Plan** (Submission draft August 2025) (EDNP)
- **Local Landscape Designation Review of South Oxfordshire and Vale of White Horse'** (Final report Prepared by LUC September 2024) (LLDR'24)
- **LI TGN 02-21 Assessing Landscape Value outside National Designations: 2021** (TGN'21) The Landscape Institute
- **Guidance on Designating Local Landscape Areas 2020** (GDLLA'20) Historic Environment Scotland and NatureScot.
- **An approach to Landscape Sensitivity Assessment – to inform spatial planning and land management: 2019** (LSA'19) Natural England.
- **Chilterns Area of Outstanding Natural Beauty Management Plan 2019-2024** (CAONBMP)
- **South Oxfordshire Landscape Character Assessment 2017** (SOLCA'17)
- **South Oxfordshire Landscape Character Assessment 2003** (SOLCA'03)
- **An Approach to Landscape Character Assessment: 2014, (2nd edition 2018)** (ALCA'14) Natural England
- **Guidelines for Landscape and Visual Impact Assessment' (GLVIA)**, Third Edition, 2013; Landscape Institute and the Institute of Environmental Management and Assessment
- **Landscape Character Assessment: Guidance for England and Scotland: 2002**, The Countryside Commission and Scottish Natural Heritage (LCAss'02).
- **The Countryside Agency Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity 2002; (TP6).**

1.12. The following planning appeal and High Court judgements are referred to within this review:

- **North of Ashford House, Ashton Road, Lancaster**, June 2024. Planning Appeal ref: APP/A2335/W/23/3335117.
- **Stroud District Council v SoSCLG** 2015. EWHC 488.
- **Land north of Crown Road, Marnhull**, April 2022. Planning Appeal ref: APP/D1265/W/21/3289314.
- **West Street, Coggeshall**, July 2017. Planning Appeal ref: APP/Z1510/W/16/3160474.

## 2. Executive summary

- 2.1. This review assesses the findings of the Eye & Dunsden Parish Landscape Character Assessment against latest guidance on preparing Landscape Character Assessments and assessing landscape value.
- 2.2. This review considers the meaning of landscape value and 'Valued Landscapes' in terms of para 187 of the NPPF. It summarises the findings of key planning appeals and other judgements and guidance to consider what is and what is not considered to be criteria for 'Valued Landscape'.
- 2.3. This review highlights the following issues with the Eye & Dunsden Parish Landscape Character Assessment:
1. The PLCA has not followed guidance in ALCA'14 or GDLLA'20. It combines LCAss descriptions with judgements regarding value. I do not consider the distinction between these two separate aspects is clearly set out in the PLCA.
  2. The PLCA has not followed guidance in GDLLA'20. No ranking is given nor is the relative value of each landscape unit presented in a systematic, criteria-based manner, and given values such as 'high', 'medium' or 'low'
  3. The PLCA has not followed guidance from GDLLA'20. Rather than carry out a more detailed LCAss, the PLCA combines LCA into larger parcels for assessment, and concludes by assessing the whole Parish as one landscape unit.
  4. It is the factors in TGN'21, Table 1 that should be considered when assessing landscape value to ensure the assessment follows the most up-to-date guidance. This has not been used in the PLCA.
  5. The PLCA does NOT include a methodology or reference to a methodology. It does NOT provide a clear and transparent evidence base.
  6. the PLCA is wrong to state that GLVIA3 paras 5.26 to 5.31 identify criteria for 'Valued Landscapes' in the terms of NPPF. The PLCA does NOT follow the latest guidance on assessing landscape value from TGN'21.
  7. The broad description of landscape setting includes some errors and emphasis that could inflate the value of the landscape in later sections. It fails to point out that the high point is part of an east west ridge, creating two distinctively different areas of slope/aspect/view within the Parish, as shown on figure 5 of the PLCA and figure 20 of the EDNP.
  8. The PLCA does not differentiate between the relative condition / values of the different LCT nor does it agree with the SOLCA'03 judgement that the 'Open dipslopes' were judged to be 'not 'special' or distinctive to quite the same degree as the other LCTs.
  9. There are a number of inconsistencies between the PLCA description of landscape character context and the SOLCA'17 description of landscape character context.
  10. The PCA does NOT provide an objective comparison of all special qualities of the AONB and the degree to which the Parish landscape shares those qualities.
  11. The PLCA is incorrect to state that there is a high level of 'interconnectivity between the edge of the Chilterns AONB and the Parish'.
  12. The PLCA is incorrect to suggest that the Parish (as a whole, or most of) is visible from the AONB.
  13. The PLCA is incorrect to state that most of the Parish falls within the setting of the AONB.
  14. I consider that the PLCA overplays the degree to which the AONB affects the value of landscape within the Parish.

15. The PLCA provides no clear methodology to explain how the 4 LCA and their boundaries have been defined.
  16. I do NOT consider that the Parish Landscape Character Areas are appropriate. There should be at least 6 PLCA rather than the 4 assessed.
  17. I consider that the PLCA wrongly identifies a number of key views.
  18. I consider that the PLCA wrongly identifies a number of landmarks.
  19. The factors used to justify why the landscape is above ordinary are NOT taken from current guidance.
  20. The PLCA fails to include an assessment of negative factors.
  21. The PLCA fails to make judgements of relative value so it is NOT possible to see how each LLCA is elevated above 'ordinary countryside.'
  22. The PLCA should NOT include local landscape designations as a factor in determining landscape value.
  23. The PLCA should NOT assume that factors of individual value necessarily lead to an area being judged to be Valued Landscape.
  24. The PLCA does NOT judge the overall 'weight of evidence' in coming to an overall judgement on landscape value for any landscape unit
  25. The conclusion of the PLCA that ALL land within the Parish should be 'Valued Landscape' is NOT an accurate or robust conclusion. It has NOT been applied proportionately, and it demonstrates that the identification of 'Valued Landscape' has been overused, contrary to the guidance given in TGN'21. It is NOT based on any clear, transparent methodology, it does not follow current guidance and it fails to recognise what does and what does not constitute 'Valued Landscape' in terms of TGN'21 and the NPPF.
- 2.4. The conclusion of the PLCA that ALL land within the Parish should be 'Valued Landscape' is NOT an accurate or robust conclusion. It does NOT follow current guidance. It has NOT been applied proportionately, and it demonstrates that the identification of 'valued landscape' has been overused, contrary to the guidance given in TGN'21. It is NOT based on any clear, transparent methodology, it and it fails to recognise what does and what does not constitute 'Valued Landscape' in terms of TGN'21 and the NPPF.
- 2.5. Of the landscapes within the Parish, I consider that only the Local Landscape Character Types 'LLCA 1: River Thames and Meadows'; and 'LLCA2: River Thames, Meadows and Lakes' should be considered to meet the criteria of 'Valued Landscape' in terms of para 187 of the NPPF, following the guidance in TGN'21.

### 3. Published guidance on (and the meaning of) Landscape Character Assessment, Local Landscape Areas for designation, Landscape value and 'Valued Landscapes'

#### Landscape Character Assessment (LCAss)

- 3.1. The most up-to-date guidance on Landscape Character Assessment is '**An Approach to Landscape Character Assessment: 2014**', (ALCA'14). This follows the earlier guidance published in '**Landscape Character Assessment: Guidance for England and Scotland**' (2002) (LCAss'02).
- 3.2. ALCA'14 Page 8 paragraph 1 defines landscape character as:  
*'a distinct and recognisable pattern of elements, or characteristics, in the landscape that make one landscape different from another, rather than better or worse.'*
- 3.3. It goes on to define Landscape Character Assessment (LCAss) as:  
*'the process of identifying and describing variation in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive.'*
- 3.4. Page 14 describes the product of a LCAss:  
*'The end product of the Landscape Character Assessment process will be an assessment consisting of a classification and map of landscape character areas and / or types, with associated descriptions of their character, and identification of key characteristics.'*
- 3.5. It goes on to make it clear that Landscape Character Assessment is separate to any follow-on work that may make judgments about the landscape:  
*'Fig. 3 Landscape Character Assessment and making judgements indicates the necessary separation between completion of the assessment proper and the use of the assessment to inform judgements and decisions.'*
- 3.6. Page 17, 1.7 makes it clear that Landscape character assessment is a neutral baseline. Any additional work such as a landscape sensitivity study (or judgements regarding landscape value) is separate from the former and may be dealt with in a separate document or combined into a single document.
- 3.7. The PLCA does not follow the guidance in ALCA'14. It combines LCAss descriptions with judgements regarding value. I do not consider the distinction between these two separate aspects is clearly set out in the PLCA.

#### LANDSCAPE CHARACTER CLASSIFICATION, TYPES AND AREAS

- 3.8. Page 44 of ALCA'14 describes the LCAss final classification and description of landscape character types and areas:  
*'Landscape classification:*  
  1. ... divides landscapes into areas of distinct, recognisable, and consistent character, and groups areas of similar character together;

2. *can be carried out at any scale, and can thus provide information on the extent and distribution of different landscape character types and areas from national to local scale;*
3. *provides the spatially referenced framework on which landscape character descriptions, and follow on judgements ... may be based;*
7. *requires a consistent, rigorous, transparent and auditable approach that will be made available to the client and other users.*

3.9. Page 45 goes on to explain the difference between Landscape Character Types and Areas.

*'Important to the process of Landscape Character Assessment, ... is the distinction between landscape character types and landscape character areas. These terms need to be used correctly and the differentiation between types and areas, identified at different levels in the hierarchy from national to local, needs to be understood.*

*Landscape Character Types (LCT):*

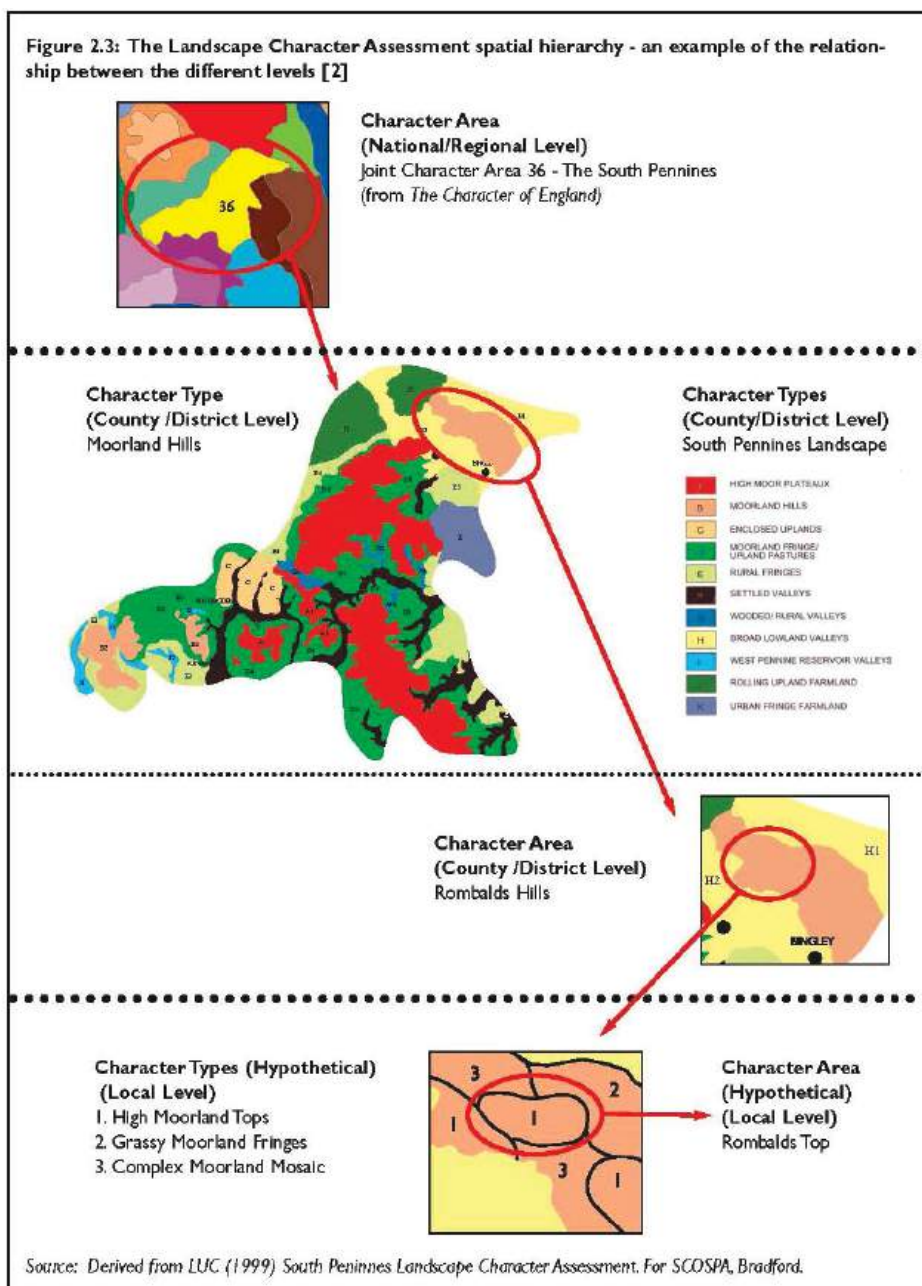
- *are distinct types of landscape that are relatively homogeneous in character;*
- *are generic in nature – they may occur in different areas ... and will share broadly similar combinations of geology, topography, drainage patterns, vegetation, historic land use and settlement pattern (this does not mean that every area within a particular type will be identical, but rather, that there is a common pattern which can be discerned in maps and in the fields survey records);*
- *may occur repeatedly in a study area, or occur in just one place;*
- *can be identified at each level in the hierarchy of assessment;*
- *can provide a good spatially referenced framework for analysing change (many influences and pressures affect areas with similar character in similar ways);*
- *when analysed, can provide a foundation upon which to develop planning and / or landscape management strategies.*

*Landscape Character Areas (LCA):*

- *are the unique individual geographical areas in which landscape types occur;*
- *share generic characteristics with other areas of the same type, but have their own particular identity;*
- *can often be more readily recognised and identified by non-specialists – sense of place is often important to local people and visitors for example;*
- *may often be more prevalent than landscape character types, because some types will occur in more than one area;*
- *can be identified at each level in the hierarchy of assessment;*
- *can provide a good spatially referenced framework from where patterns of local distinctiveness, and factors influencing sense of place, can be drawn;*
- *can be used to develop tailored policies and strategies, that reflect the characteristics that make a given landscape different or special.'*

3.10. The difference between LCA and LCT can be confusing as the terms are repeated at differing levels of hierarchy in assessments, from national/regional level, through district level to local level. **'Landscape Character Assessment: Guidance for England and Scotland'** (2002) (LCAs'02) provided further guidance on Landscape Character Types and Areas and their spatial hierarchy. Fig 2.3 (page 12) shows:

- **Landscape Character Area** at a National/Regional level in the hierarchy.
- **Landscape Character Types** at County/District Level. The Regional Landscape Character Area is sub divided into smaller units or Types. Landscape Character Type ‘Moorland Hills’ is a generic type, that occurs in 3 different areas.
- **Landscape Character Areas** at a County/District level. The Area ‘Rombolds Hills’ is one of the 3 unique individual geographical areas that occur as part of the ‘Moorlands Hills’ Landscape Character Type.
- **Landscape Character Types** at a local level. The ‘Rombolds Hills’ could be further sub-divided into smaller landscape units.



**Fig 1:** Landscape Character Assessment: Guidance for England and Scotland’ (2002) page 12, figure 2.3

## OUTPUT OF A LANDSCAPE CHARACTER ASSESSMENT

- 3.11. ALCA'14, Page 17, 1.7 describes the outputs of a LCAss and how it may inform judgements:
- 'A Landscape Character Assessment concludes after characterisation of the landscape – the map(s) and accompanying descriptions of the character types and / or areas are the final product. This can then exist as a neutral baseline of the current character of the landscape. All Landscape Character Assessments should ... make a clear distinction between the outputs of the characterisation process, and any additional ... and related follow-on decisions/recommendations associated with making judgements to inform specific actions. The latter exercise is separate from the former'.*

## SUMMARY OF LANDSCAPE CHARACTER ASSESSMENT

- 3.12. A Landscape Character Assessment:
1. Identifies and describes characteristics that make different landscapes distinctive.
  2. Maps and describes these different landscapes as Landscape Character Areas and/or Landscape Character Types.
  3. Can be carried out at National/Regional, County/District or Local level.
  4. Provides the spatially referenced framework on which follow on judgements may be based.
  5. Is a neutral baseline. Any judgement regarding the value of characteristics or the value of Areas or Types should be part of a separate section or document.
- 3.13. The PLCA has not followed guidance in ALCA'14. It combines LCAss descriptions with judgements regarding value. I do not consider the distinction between these two separate aspects is clearly set out in the PLCA.

## Local Landscape Areas (LLA) for designation

- 3.14. The PLCA (para 2.2) states its objective is to provide evidence for the Parish to be included as a Local Valued Landscape, ie a LLA for designation.
- 3.15. The Local Landscape Designation Review of South Oxfordshire and Vale of White Horse (Final report Prepared by LUC September 2024) (LLDR'24) postdates the PLCA. The LLDR'24 refers to both Assessing Landscape Value outside National Designations: 2021 (TGN'21) (para 2.4) and Guidance on Designating Local Landscape Areas 2020 (GDLLA'20) (para 2.5). Para 2.7 explains that the methodology draws on both publications.
- 3.16. GDLLA'20, page 14, Fig 2 sets out the key steps in local landscape area designation. Step 4 states:
- Existing landscape studies inform selection of candidate LLAs.*  
*New studies may extend understanding of landscapes and place.*
- 3.17. GDLLA'20, Para 2.2.5 discusses how national designations (such as the AONB/National Landscape) affect LLA designations in an authority:
- 'Local authorities with a high proportion of their area designated nationally ... should consider the purpose and extent of their LLAs carefully. Equally, all local authorities should explore the relationship between LLAs and other national and local designations.'*
- 3.18. GDLLA'20, Para 2.2.6 discusses the relationship between LLAs and other landscape policies:

*'if a significant number of these policies are essentially protective in nature, a large number of LLA designations may not be required. An important factor to consider is the range and extent of other designations and approaches which may be as or more effective than designation in delivering the desired objectives.'*

- 3.19. GDLLA'20, Paras 2.4.7 – 2.4.10 set out the methodology for selecting landscapes for designation. Key points include:

*2.4.7: 'The assessment methodology must identify a way of evaluating the criteria to allow justifiable conclusions on which landscapes are suitable for designation. The appropriate method must identify and describe the special characteristics relevant to the study area...*

*2.4.9: Ranking should be applied based on a qualitative description. This is where the relative value of each landscape unit is assessed in a systematic, criteria-based manner, and can be given values such as 'high', 'medium' or 'low'. Such an evaluation can help comparison between landscape units and identifies those ranked highly which are then considered as candidates for designation...*

*2.4.10: It is important to clearly describe the factors considered, to relate them to each of the assessment criteria, and to set out the judgements used to identify and select landscapes for designation.*

- 3.20. The PLCA has not followed guidance in GDLLA'20. No ranking is given nor is the relative value of each landscape unit presented in a systematic, criteria-based manner, and given values such as 'high', 'medium' or 'low'

- 3.21. GDLLA'20, Paras 2.5.2 – 2.5.6 discuss the relationship between Landscape Character Assessments and LLAs. Key points include:

*2.5.2: Landscape Character Assessment (LCAss) identifies, describes, classifies and maps what is distinctive about our landscapes. ...*

*2.5.3: Landscape Character Assessment ... can be used as a basis to inform judgements on the particular merits of landscapes being considered for designation.*

*2.5.4: The Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be necessary ... to carry out a more detailed LCAss ...*

*2.5.6: many landscapes selected for designation are in places where different landscape character types meet. This arises because visual diversity and contrast are important in forming scenic quality. Landscape Character Assessments are a useful tool for analysis, but should not be used in isolation to identify landscapes for designation.'*

- 3.22. GDLLA'20, Table 2, page 26 sets out the differences between landscape characterisation and landscape designation. Key differences are that the designation process identifies more discrete areas of landscape (than those identified in a LCAss) and that these more discrete areas are considered to be of higher merit than the larger areas identified in the LCAss.

- 3.23. The PLCA has not follow the above guidance above from GDLLA'20. Rather than carry out a more detailed LCAss, the PLCA combines LCA into larger parcels for assessment, and concludes by assessing the whole Parish as one

landscape unit.

3.24. GDLLA'20, Para 2.7.10 discusses naming of LLAs and states:

*'We strongly encourage the use of the term Local Landscape Area [Name of place], or [Name of place] Local Landscape Area.'*

3.25. GDLLA'20, Para 2.7.11 and table 3 on page 34 recommends good practice in writing a Statement of Importance for each identified LLA. The Statement of Importance should include (amongst other things):

*'The reasons for designation and the criteria it met.*

*A clear description of the landscape and why it is designated.*

*What is valued and why.*

*The boundary; outline why it takes this form.*

*A broad justification for the designated area is needed.'*

3.26. GDLLA'20, Section 3 discusses Development plan policy. Para 3.4 states:

*'The level of protection accorded to LLAs is a matter for each authority to set out through its Development Plan policy. The level of protection should not be as high as that given to international or national designations.'*

## SUMMARY OF LOCAL LANDSCAPE AREAS (LLA) DESIGNATION

1. The latest relevant guidance is TGN'21 and GDLLA'20.
2. Existing landscape studies should guide the selection of candidate LLAs, and new studies can enhance understanding of local landscapes.
3. Local authorities with nationally designated areas need to carefully consider their LLA designations, exploring how LLAs relate to national and local policies.
4. A robust assessment methodology is crucial for evaluating landscapes suitable for designation. This includes systematic ranking based on qualitative descriptions, identifying special characteristics, and providing justifiable conclusions.
5. The Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be necessary to carry out a more detailed LCAss.
6. The relative value of each landscape unit should be assessed in a systematic, criteria-based manner, and be given values such as 'high', 'medium' or 'low'. Such an evaluation can identify areas ranked highly as candidates for designation
7. The designation process identifies more specific, higher merit landscape areas compared to broader classifications in LCAss.
8. GDLLA'20 encourages naming LLAs in a standardized format and provides guidelines for writing a Statement of Importance for each area. This statement should detail the reasons for designation, landscape description, values, boundaries, and justifications.
9. The protection level granted to LLAs is determined by each authority's Development Plan policy, which should be less stringent than that for national or international designations.
10. Overall, there should be a systematic, informed approach to LLA designation, integrating local studies and policies while ensuring clear communication of each area's significance.
11. The PLCA has not followed guidance in GDLLA'20. No ranking is given nor is the relative value of each landscape unit presented in a systematic, criteria-based manner, and given values such as 'high',

'medium' or 'low'

12. The PLCA has not followed guidance from GDLLA'20. Rather than carry out a more detailed LCAss, the PLCA combines LCA into larger parcels for assessment, and concludes by assessing the whole Parish as one landscape unit.

## Landscape Value Assessment

- 3.27. **TGN 02-21 Assessing Landscape Value outside National Designations** (TGN'21) is the most up-to-date guidance on assessing landscape value. Appendix 4 of TGN'21 explains where the term 'Valued Landscapes' comes from and its meaning within the Planning System. Key points from Appendix 4 are summarised below:
- 3.28. In 2012, the first version of the NPPF was published. It included a policy (paragraph 109) which stated that:  
*'The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes'. No definition of a 'valued landscape' was given.*
- 3.29. Para A4.1.2 explains that the term valued landscape appears in the title of GLVIA3 Box 5.1 ('Range of factors that can help in the identification of valued landscapes') which was published in 2013. However, the reference in GLVIA is a quote from TP6 and not a response to 'Valued Landscapes' in the NPPF.
- 3.30. TGN'21 para 2.2.2 explains that:  
*'landscape value can be assessed as an evaluation stage of a landscape character assessment or as a follow-on study. In this case landscape qualities will be identified in relation to individual character areas or types. Currently these are commonly described as 'valued landscape characteristics' or 'landscape qualities'*
- 3.31. TGN'21 goes on to state:  
*'It is intended to supplement existing ... guidance on Landscape Character Assessment and Landscape Sensitivity Assessment [LSA]... and Landscape and Visual Impact Assessment. [LVIA]' (Para 1.3.1)*  
  
*'Landscape value can be assessed as an evaluation stage of a landscape character assessment or as a follow-on study. In this case landscape qualities will be identified in relation to individual character areas or types. Currently these are commonly described as 'valued landscape characteristics' or 'landscape qualities.'*  
*(Paragraph 2.2.2)*
- 3.32. The most up-to-date guidance for LSA is LSA'19. The most up-to-date guidance for LVIA is GLVIA3. TP6 also provides guidance on how to judge the relative value of landscapes.
- 3.33. The current version of the NPPF (Dec 2024) has transposed paragraph 109, with modifications, to paragraph 187. This states:  
*Planning policies and decisions should contribute to and enhance the natural and local environment by:*  
  
*protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'.*
- 3.34. The interpretation of the phrase '*in a manner commensurate with their statutory status*' is relatively

straightforward. Where a landscape has a statutory status, such as a National Park or AONB (National Landscape), it is a 'Valued Landscape.'

- 3.35. The interpretation of '*identified quality in the development plan*' is not clear. It may mean non-statutory, locally designated landscapes and/or any landscape where there is evidence to justify the identification of a 'Valued Landscape'. Local designation alone may not be sufficient evidence (see TGN'21 para A4.2.11). It is assumed that the word 'quality' means degree of excellence.

## DEFINING LANDSCAPE PARCELS/UNITS FOR VALUE ASSESSMENT

- 3.36. Landscape Character Assessments (such as PLCA) can provide a basis to identify landscape units to be considered for designation. They should however be a neutral baseline requiring further assessment on the value of the landscapes being considered for designation. As explained above Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be necessary to carry out a more detailed LCAss. I do not consider that the PLCA has done this.
- 3.37. TGN'21 recognises that:  
*'Value is best appreciated at the scale at which a landscape is perceived – rarely is this on a field-by-field basis.'*
- 3.38. The '*scale at which landscape is perceived*' is not defined. When assessing landscape value, it is important to look at the role that the site or parcel plays in the wider landscape and not limit the assessment to a single site or entire LCA/LCT.
- 3.39. Boundaries of landscape areas do not follow administrative boundaries. It follows that assessment of landscape areas should not limit their boundaries to administrative areas. Factors that enhance or detract from the value of a landscape area may be outside the administrative area, but still within the landscape parcel's boundary or affect the landscape from outside the parcel such as a long attractive view or unsightly view out of the parcel.
- 3.40. Page 44 of ALCA'14 explains that Landscape Character Areas are unique individual geographical areas that have their own particular identity and can often be readily recognised and identified by non-specialists. I consider that this is a reasonable description of how much and how an area of landscape is perceived.
- 3.41. Page 45 of ALCA'14 explains that Landscape Character Types are distinct types of landscape that occur within the unique individual geographical areas of Landscape Character Areas.
- 3.42. Page 45 of ALCA'14 goes on to state that Landscape Character Types:  
*'can provide a foundation upon which to develop planning and / or landscape management strategies.'*
- 3.43. Page 9 of LSA'19 explains that for Sensitivity Assessment, the 'reporting unit' '*may be Landscape Character Areas or Landscape Character Types, or subdivisions of either, depending upon the scale and purpose of the landscape sensitivity assessment. Some practitioners have referred to these as land parcels,*'
- 3.44. GDLLA'20, para 2.5.4 and 2.5.6 state:  
*'Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be*

*necessary ... to carry out a more detailed LCAs'. ... Landscape Character Assessments are a useful tool for analysis, but should not be used in isolation to identify landscapes for designation.'*

- 3.45. The Inspector for APP/Z1510/W/16/3160474 (West Street, Coggeshall, July 2017) concluded at Paragraph 30 of her decision as follows:

*'a site might be important because of its position in the landscape as part of it rather than being important in its own right, rather like the pieces of a jigsaw puzzle. Further, as my colleague in the Nanpanton Road appeal sets out, the interactions between people and place are important in the perceptions of landscape and people will perceive the site in a wider context.'*

- 3.46. I consider this analogy to jigsaw puzzles applies equally to considering the merits of dividing a large LCT or LCA into smaller landscape parcels that might individually have a different value than the larger LCT/LCA.

- 3.47. The Inspector for Appeal Ref: APP/A2335/W/23/3335117; North of Ashford House, Ashton Road, Lancaster, had to address the extent of the landscape to be considered as being perceived as a single landscape unit. He considered it included the:

*'extent of the landscape experienced by those on the canal towpath which the proposal would potentially have an effect.'*

- 3.48. This was a far smaller parcel than the district wide LCT or LCA within which the site was located but was judged by the Inspector to be the appropriate geographic area to be assessed for value.

- 3.49. I consider that Local Level Landscape Character Areas, or their sub-divisions, are recognisably perceived landscape parcels, at an appropriate scale for an assessment of landscape value within a Neighbourhood Plan.

- 3.50. I consider that GDLLA'20 and recent appeal decisions support the assessment of landscape value at District level should be a scale/grain smaller / finer than that of district wide LCTs or LCAs. This is not the approach taken by the PLCA, instead of assessing value at a scale/grain smaller / finer than that of district wide LCTs or LCAs, it has combined these and concluded by assessing the whole Parish as one large landscape unit.

## ASSESSING VALUE

- 3.51. All landscapes have value to some degree. Para 5.26 of GLVIA3 notes the fact that a lack of a formal landscape designation does not mean a landscape does not have value. The European Landscape Convention recognises that 'ordinary landscapes also have their value.'

*'the landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas.'*

- 3.52. Taking into account that all landscapes have value and that LCAs is concerned with describing and mapping the baseline characteristics of landscape parcels, I consider that the evaluation of key sensitivities or values as part of the LCAs is not an indication that the landscape is 'valued' in the sense of NPPF.

- 3.53. Para 5.31 of GLVIA3 states:

*'Assessment of value attached to the landscape should be carried out within a clearly recorded and*

*transparent framework*.

- 3.54. Box 5.1 of GLVIA3 (page 84) provides some guidance on factors that can be considered when judging landscape value of undesignated landscapes. Since GLVIA3 was published in 2013, appeal decisions, high court judgements and practitioners' experience have provided further information about the factors which can be considered in assessing landscape value outside nationally designated landscapes. These have been incorporated into Table 1 of TGN'21.
- 3.55. It is the factors in TGN'21, Table 1 that should be considered when assessing landscape value to ensure the assessment follows the most up-to-date guidance. This has not been used in the PLCA.
- 3.56. TGN'21 Table 1 gives clear definitions, examples of indicators of landscape value and examples of evidence. This broadly presents the same factors as Box 5.1 from GLVIA3 but has been further refined and clearer guidance provided.
- 3.57. It is recognised in various guidance, including GDLLA'20, that the relative value of each landscape parcel is assessed in a systematic, criteria-based manner, and should be given qualitative values such as 'high', 'medium' or 'low'.
- 3.58. The Planning Inspector for Planning Appeal ref: APP/A2335/W/23/3335117: North of Ashford House, Ashton Road, Lancaster, (June 2024) agreed that it was appropriate to assess landscape value with reference to Table 1 of TGN'21 and agreed with each parties approach of using a qualitative five point scale of: Low; Low-medium; Medium; Medium-high; High for each factor within Table 1.
- 3.59. Para 2.4.5 of TGN'21 makes key points on the practical application of the factors in Table 1, including the following:
- *The factors to be considered are not fixed as they need to be appropriate to the particular project and location.*
  - *The indicators of value should be reviewed on a case-by-case basis, taking into account what they contribute (positively or negatively) to a specific landscape. The relative importance to be attached to each indicator is likely to vary across different landscapes. Once evidence for each factor has been collated and assessed, it is important to step back and judge the overall 'weight of evidence' in coming to an overall judgement on landscape value.*
  - *There are likely to be overlaps between the factors, as well as overlaps with other specialist studies for example in relation to natural and cultural factors. These overlaps should be acknowledged and considered when presenting conclusions on the overall value of the landscape.*
  - *Landscape value, and the way in which landscapes are valued by people, is a dynamic process, and can change over time.*

## CRITERIA FOR 'VALUED LANDSCAPE'

What is Valued Landscape?

- 3.60. The NPPF does not define 'Valued Landscapes' nor does the PPG. it has been left to Planning Appeals and case law

to describe its essential features.

- 3.61. Stroud District Council v SoSCLG 2015. EWHC 488 established that Valued Landscapes:
- Are those that are *'out of the ordinary'*.
  - must be more than simply popular.
  - Have demonstrable attributes which would take the area beyond mere countryside.
- 3.62. TGN'21 Appendix 4 sets out the Landscape Institute's guidance on how landscape professionals should identify 'Valued Landscapes'.
- 3.63. Where a landscape has a statutory status, such as a National Park or National Landscape (AONB), it is self-evident that it is a 'Valued Landscape'.
- 3.64. For areas with no statutory status and where there is little published evidence to support existing local landscape designations, the Landscape Institute supports an evidence-based approach to judge value, as some local designations do not have an underlying evidence-base to support them (TGN'21 para A4.2.7 – 8).
- 3.65. Evidence that has been used in reaching judgements about whether an undesignated landscape should be considered to be a valued landscape includes:
- factors that are generally agreed to influence landscape value as set out in GLVIA3 Box 5.1 or more recently TGN'21 Table 1;
  - the presence of qualities in the landscape that are identified in the development plan (which includes neighbourhood plans) as requiring protection.
- 3.66. When making judgements regarding 'Valued Landscapes' TGN'21 notes the following key points:
- *'It is not possible to set a definitive threshold above which a landscape is considered to be a 'valued landscape'. It is a judgment that must be made on a case-by-case basis, based on the evidence. There should be a weight of evidence that supports the recognition of a landscape as valued above more everyday landscapes.'*
  - *'The character and quality of landscapes are variable and what may be defined as reaching the 'valued landscape' threshold/criteria in one part of the Country may be considered to be an 'everyday landscape' in another.'*
  - *'It would be expected that a 'valued landscape' would demonstrate the presence of a number of indicators of landscape value, as set out in Table 1, although it is possible for one indicator to be of such importance (e.g. rarity, association or perceptual aspects) that the landscape is judged to be a 'valued landscape' even if other indicators are not present.'*
  - *'The identification of landscape value needs to be applied proportionately ensuring that identification of 'valued landscape' is not overused.'*
- 3.67. TGN'21 (page 42, highlighted text) defines 'Valued Landscape' as:
- 'an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes.'*
- 3.68. The Planning Inspector for Planning Appeal ref: APP/A2335/W/23/3335117: North of Ashford House, Ashton Road, Lancaster, (June 2024) agreed with the above definition from TGN'21 (PIR para 24).

What it is not

- 3.69. In *Stroud District Council v SoSCLG* 2015. EWHC 488, it was established that having some characteristics that may have high value, does not necessarily mean the site (or parcel) should be considered 'Valued Landscape' on the whole. The Stroud Site was 150m from the Cotswold AONB and crisscrossed by well used public footpaths from which the AONB was visible. The Inspector did not regard these as attributes that took the site out of the ordinary and beyond mere countryside.
- 3.70. The judgement went further regarding the AONB, concluding that land from which the AONB could be seen does not have the same level of protection as views in conjunction with the AONB, from within the AONB.
- 3.71. The Inspector in the Crown Road case considered that site's value with regard to its contribution to nearby Conservation Areas, visual amenity, recreation and landscape character. The Inspector concluded:
- "(The site) does not contribute to the significance of ... the ... Conservation Areas. Its value to local residents is undisputed but stems mainly from visual amenity including views and recreational considerations because of its location adjacent to existing housing. Its demonstrable physical attributes are not very different to many other fields and slopes around the village and in the locality generally including others crossed by public rights of way. It does not contribute to the wider landscape character any less or more than other similar fields around the settlement. Having regard to the advice in (TGN'21), ... the site does not deserve any higher level of protection that might be claimed under paragraph 174(a) [now 187a] of the NPPF."*

## SUMMARY OF LANDSCAPE VALUE ASSESSMENT

1. All landscapes have some value.
2. Landscape may be valued by different stakeholders for a variety of reasons.
3. Value can apply to areas of landscape as a whole, or to the individual elements, features and aesthetic or perceptual dimensions which contribute to the character of the landscape.
4. Value is best appreciated at the scale at which a landscape is perceived.
5. I consider that Local Level Landscape Character Areas (or their sub-division) are the appropriate landscape parcels for an assessment of landscape value within a Neighbourhood Plan.
6. For areas with no statutory status, and/or areas with historic local landscape designations, an evidence-based approach should be used to judge value.
7. Evidence in reaching judgements includes:
  - o factors set out in TGN'21 Table 1;
  - o the presence of qualities in the landscape that are identified in the development as requiring protection.
8. There is no definitive threshold above which a landscape is considered to be a 'Valued Landscape'.
9. It is the factors in TGN'21 Table 1 that should be considered when assessing landscape value to ensure the assessment follows the most up-to-date guidance.
10. 'Valued Landscape' is defined in TGN'21 as:
 

*"an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes."*
11. 'Valued Landscape':
  - o is that which is "out of the ordinary".
  - o must be more than simply popular.

- Have demonstrable attributes which would take the area beyond mere countryside.
12. The presence of high value attributes does not necessarily lead to an area being judged to be 'Valued Landscape'. Such attributes include:
    - Proximity to an AONB.
    - Views of an AONB.
    - Presence of well used PRoW.
    - Contribution to Conservation Areas.
    - Contribution to visual amenity.
    - Use for recreation.
  13. The judgement on landscape value should be presented using a verbal scale such as: High; High/Medium; Medium; Medium/Low; Low.
  14. It is important to judge the overall 'weight of evidence' in coming to an overall judgement on landscape value.
  15. Overlaps between the factors, as well as overlaps with other specialist studies should be acknowledged and considered when presenting conclusions on the overall value of the landscape.
  16. What may be defined as reaching the 'Valued Landscape' criteria in one part of the Country may be considered to be an 'everyday landscape' in another.
  17. A 'Valued Landscape' should demonstrate the presence of a number of indicators of landscape value, although it is possible for one indicator to be of such importance that the landscape is judged to be a 'valued landscape' even if other indicators are not present.
  18. The identification of landscape value needs to be applied proportionately ensuring that identification of 'Valued Landscape' is not over-used.

## 4. Review of South Oxfordshire Landscape Character Assessments 2003 and 2017.

### The South Oxfordshire Landscape Character Assessments 2003 (SOLCA'03)

- 4.1. The PLCA states in para 1.4 that it builds on the **South Oxfordshire Landscape Character Assessment 2017** (SOLCA'17). In para 4.2 it states that SOLCA'17 reflects much of the 2003 study (**South Oxfordshire Landscape Character Assessment 2003** [SOLCA'03]).
- 4.2. SOLCA'03 was undertaken in 1998, published in 2003. It pre-dated the guidance in **Landscape Character Assessment: Guidance for England and Scotland: 2002** (LCA'02) or subsequent guidance. Page 2 explains that guidance within **Countryside Commission (1993) Landscape assessment guidance** formed the basis of the study.
- 4.3. It is useful to this review as it includes an assessment and judgement of landscape quality and condition. SOLCA'17 does not include this separate assessment of quality and condition. SOLCA'03 therefore provides the most recent, third party assessment of quality and condition.
- 4.4. It classifies the landscape into 11 Character Areas (LCA) that equate to Character Areas (Regional Level) in LCA'02 (see para 3.10 above). Within these larger Areas it identifies 23 Landscape Character Types (LCT). These Types equate to Character Types (County/District Level) in LCA'02. It describes the baseline landscape characteristics of the LCA and LCT.
- 4.5. It describes the Landscape Character Types within each landscape Character Area and lists 'key characteristics' of each type.
- 4.6. It does not identify and number/name each landscape parcel that make up the LCT (as recommended in LCA'02, fig 2.3).
- 4.7. It goes on to make judgements about landscape quality and condition for each LCT. Page 3 explains that the second part of the assessment goes on to identify variations in landscape quality and condition across the District. These variations are based on judgements and go beyond Landscape Assessment. They consider a number of attributes based on Countryside Commission guidelines of the time. Each LCT was assigned one of four enhancement strategies as described on page 3:

***Conserve** - where the landscape is of particularly high scenic quality, is unspoilt, retains a strong, intact landscape structure and sense of place, and often contains areas or features of ecological or cultural heritage significance.*

***Repair** - landscapes which have a positive rural character, attractive qualities and where character, landscape structure and sense of place are still comparatively strong but which are not 'special' or distinctive to quite the same degree as those in the above category.*

***Restore** - landscapes which retain a rural and essentially attractive character but where landscape elements*

*and structure are in decline, largely through intensive farming practices.*

**Reconstruct** - areas where the character and quality of the landscape has been substantially modified by poor land management, non-agricultural land uses, or intrusive features, eg. airfields, built development, mineral extraction, roads, power lines etc.

## KEY FINDINGS OF THE SOLCA'03 IN RELATION TO EYE & DUNSDEN PARISH

- 4.8. There are two LCA within the Parish: 'Chilterns Plateau with Valleys' and 'Thames Valley and Fringes'
- 4.9. There are 5 LCT within the Parish: 'Open dipslope', 'Semi-enclosed dipslope', 'Wooded dipslope', 'Flat floodplain pasture', 'Floodplain wet'.
- 4.10. The quality and condition for each of these LCT was judged to be:
- |                               |                 |
|-------------------------------|-----------------|
| 1. 'Open dipslope',           | <b>Repair</b>   |
| 2. 'Semi-enclosed dipslope',  | <b>Conserve</b> |
| 3. 'Wooded dipslope',         | <b>Conserve</b> |
| 4. 'Flat floodplain pasture', | <b>Conserve</b> |
| 5. 'Floodplain wet'.          | <b>Restore</b>  |
- 4.11. At the time of the assessment the 'Open dipslopes' were judged to be '*not 'special' or distinctive to quite the same degree as those in the above (conserve) category*'.
- 4.12. The PLCA does not differentiate between the relative condition / values of the different LCT nor does it agree with the SOLCA'03 judgement that the 'Open dipslopes' were judged to be '*not 'special' or distinctive to quite the same degree as the other LCTs*'.
- ### The South Oxfordshire Landscape Character Assessments 2017 (SOLCA'17)
- 4.13. This Assessment was published in 2017. Para 2.1.1 explains that it is based on GLVIA3; TP6); ALCA'14.
- 4.14. Para 2.5.2 explains that the '*study has concentrated on updating earlier classification and descriptions of Landscape Types and Character Areas*'.
- 4.15. It classifies the landscape into 11 Character Areas (LCA) that equate to Character Areas (Regional Level) in LCA'02 (see para 3.10 above). Within these larger Areas it identifies 24 Landscape Character Types (LCT) (one more than the earlier SOLCA'03). These Types equate to Character Types (County/District Level) in LCA'02. It describes the baseline landscape characteristics of the LCA and LCT.
- 4.16. For each **Character Area** it describes broad characteristics of:
- Location and boundaries
  - Natural factors: Geology and landform, Hydrology, Biodiversity
  - Cultural and social factors: Land-use, Public rights of way, Settlements,
  - Perceptual and aesthetic factors

- 4.17. It describes the **Character Types** within each Character Area by listing 'key characteristics' of each type.
- 4.18. It does not identify and number/name each landscape parcel that make up the LCT (as shown in LCA'02, fig 2.3). I consider this a failing of SOLCA'17 as it would assist in more detailed, later assessments.
- 4.19. It avoids making judgements regarding the value of landscapes, landscape features, or their quality/condition.

#### FINDINGS OF THE SOLCA'17 IN RELATION TO EYE & DUNSDEN PARISH

- 4.20. As with SOLCA'03 there are two LCA within the Parish: 'LCA 10 Chilterns Plateau with Valleys' and 'LCA 11 Thames Valley and Fringes'
- 4.21. As with SOLCA'03 there are 5 LCT within the Parish: 'Open dip slope', 'Semi-enclosed dip slope', 'Wooded dip slope', 'Flat floodplain pasture', 'Floodplain wetland'.
- 4.22. Unlike SOLCA'03 there is no assessment of the general quality or condition of landscape within these LCT.

## 5. Review of Eye & Dunsden Parish Landscape Character Assessment (PLCA)

- 5.1. The version of the PLCA available on-line is dated 26<sup>th</sup> April 2022 (draft x 12). It pre-dates **the Landscape Character Assessment for South Oxfordshire and Vale of White Horse District Councils Sep 2024** (LCA'24). Para 1.4 states that it *'builds on published landscape character studies most notably the South Oxfordshire Landscape Character Assessment 2017.'* In para 4.2 it states that SOLCA'17 reflects much of the 2003 study (SOLCA'03).

### Introduction and objectives of the study

- 5.2. Para 1.1 states its purpose is:  
*'to inform the emerging policies in the Neighbourhood Plan to identify the value of the landscape and recommend areas which constitute a Local Valued Landscape.'*
- 5.3. Para 2.2 states the report will meet the following objective of the Eye & Dunsden Neighborhood Development Plan: (amongst others):  
*'To provide evidence for the parish to be included as a Local Valued Landscape.'*
- 5.4. This does not follow guidance in ALCA'14 that a LCA *'is a neutral baseline'*.
- 5.5. Nor do I consider that it sets out to objectively assess and rank the value of land parcels within the Parish and report on their relative value and go on to provide an objective consideration as to whether parcels meet the criteria for 'Valued Landscape'. Para 2.2 suggests that the report started out with the intention to provide evidence to support a judgement that all land within the Parish should be designated as 'Valued Landscape'.
- 5.6. Para 2.5 states:  
*'In the light of NPPF para 174 a) and b), [now para 187 a) and b)] the Study assists the NDP in its identification of Valued Landscapes within the parish outside of the Chilterns AONB. The Study identifies landscape and visual features of value in each area which collectively form the physical attributes which define Valued Landscapes within the Neighbourhood Plan Area. The Study does not start with the premise that all landscapes are valued (i.e. as falling within NPPF para 174 (a)) but through careful examination of those features shared with the AONB or identified as worthy of conservation and enhancement as set out within the SODC Landscape Character Assessment 2017 (in accordance with the Landscape Institute's GLVIA 3 paras 5.26 to 5.31), identifies those areas that meet the criteria for Valued Landscapes.'*
- 5.7. The PLCA is wrong to NOT acknowledge that all landscapes are valued. The European Landscape Convention recognises that everyday areas as well as areas of outstanding beauty have value. A landscape having value does not mean it falls within NPPF para 187. What is important is to make a professional judgement within a *'clearly recorded and transparent framework'*, about the relative value so that those areas of higher value can be identified.
- 5.8. Appendix 1 of the PLCA lists documents consulted as part of the assessment. TGN'21 is not included despite it being the most up-to-date guidance on assessing landscape value at the time the PLCA was published (April 2022).

- 5.9. As explained in TGN'21 para A4.1.2, the PLCA is wrong to state that GLVIA3 paras 5.26 to 5.31 identify criteria for 'Valued Landscapes' in the terms of NPPF.
- 5.10. The PLCA does NOT use recognised, up-to-date the criteria for 'Valued Landscapes'.
- 5.11. The PLCA does not include a methodology or reference to a methodology. Without this, it can NOT be considered to provide a clear and transparent evidence base.

## Landscape setting

- 5.12. Section 3 of the PLCA describes the broad landscape of the Parish.
- 5.13. Para 3.4 describes topography. It states that from a high point on the south side of Comp Wood, the landform falls south-eastwards. It fails to point out that the high point is part of an east west ridge creating two distinctively different areas of slope/aspect/view within the Parish, as shown on figure 5 of the PLCA and figure 20 of the EDNP.
- 5.14. Para 3.5 states that the Thames River valley side creates a local skyline feature as can be viewed from the A4155. I disagree with this statement. Para 3.18 describes the A4155 as being well enclosed by vegetation and only visible from the wider landscape at Hampstead Hill. There is no explanation of how there can be identified views from the A4155, whilst the A4155 is screened from views towards it. The site visit confirmed that roadside vegetation along the A4155 screens views of the Dipslopes to the north of the road for most of the route through the Parish. The only view of the Dipslopes creating a skyline feature is along the section of the A4155 east of Playhatch when traveling eastward where Hampstead Hill can be seen.
- 5.15. Para 3.9 describes woodlands as a feature of the Parish but clarifies this by explaining that woodlands are '*towards the northern parish boundary, where they then become more concentrated beyond the parish boundary*'. This suggests that woodland is a relatively minor feature of the southern and central parts of the Parish.
- 5.16. Para 3.18 describes detracting features within the Parish:  
*'The overhead pylons which align in a north-south direction on the western side of the parish. The two major roads: A4155 and the B478 although busy are well enclosed by roadside vegetation and with regard to the A4155 is only visible from the wider landscape at Hampstead Hill'*.
- 5.17. Later sections of the PLCA fail to highlight these detracting features appropriately or include them in an assessment of value.
- 5.18. I consider that the broad description of landscape setting includes some errors and emphasis that could inflate the value of the landscape in later sections.

## Landscape Character Context

- 5.19. Section 4 considers the landscape character of the Parish with reference to SOLCA'17. It describes the Landscape character areas and types found in the Parish.

- 5.20. Para 4.5 describes the Key characteristics of the 'Chilterns Plateau with Valleys Landscape Character Area LCA10' of relevance to the parish, as set out in sections 15.3-15.6 of SOLCA'17 study. I consider that it is implied that the following bullet points are taken from SOLCA'17. However, there are a number of inconsistencies between the PLCA bullets and the SOLCA'17 bullets
- 5.21. Para 4.5, bullet point 5 of the PLCA states:
- *'No major roads cross through this area'*
- 5.22. Para 15.3, bullet 5 of the SOLCA'17 more accurately states:
- *'The A407 and A4130 roads cross through the area'.*
- 5.23. Para 4.5, Bullet point 6 of the PLCA states that the hamlet of Dunsden Green is the largest settlement. It may be the largest settlement in the Parish part of LCA10, but bullet 5 of the SOLCA'17 states that Sonning Common is the largest settlement in LCA10.
- 5.24. Para 4.5, bullet 10 of the PLCA refers to an area of good quality semi-improved grassland north of Round Wood in the Parish. This is not mentioned in the SOLCA'17.

## Relationship of the AONB to the Parish

- 5.25. Para 4.11 – 4.16 discuss the relationship of the Parish land to the Chilterns AONB. Para 4.11 states that:
- 'The special qualities of the AONB landscape are set out in the Chilterns Management Plan 2019-2024 and are reflected in the SODC Landscape Character Assessments.'*
- 5.26. The SOLCA'17 does NOT explicitly reference the special qualities of the AONB. It describes the AONB in para 1.4.1. It also makes reference to the AONB where Character Areas or Types are within, or contain, areas of the AONB.
- 5.27. Para 4.12 of the PLCA attempts to highlight special qualities of the AONB that are also present in the Parish. It is not an exhaustive list of the AONB special qualities and does not objectively note qualities that are NOT in the Parish, or the degree to which qualities occur in the Parish, eg none, low-high.
- 5.28. The special qualities of the AONB are described in Section 2.0 of the **Chilterns Management Plan 2019-2024** (CMP). Table 1 (below) of this Review lists the special qualities of the AONB from pages 10 and 11 of the CMP and the degree to which they are, or are not, present in the Parish on a scale of: None; Low; Moderate-low; Moderate; Moderate-high; High.
- 5.29. I do NOT consider that para 4.12 of the PLCA is an objective comparison of all special qualities of the AONB and the degree to which the Parish landscape shares those qualities. Overall, I consider that the special qualities of the AONB that are also present in the Parish are only moderate to low, as shown in Table 1 below.

**Table 1: Degree to which AONB characteristics are present in the Parish.**

Characteristics	Presence	Notes
<i>PANORAMIC VIEWS from and across the escarpment interwoven with intimate dipslope valleys and rolling fields.</i>	None	The landscape around the fringes of the Parish are not part of the chalk escarpment, there are therefore no views 'from and across the escarpment'.
<i>Significant ancient hedgerows, hedgerow and field trees, orchards and parkland weaving across farmland.</i>	Moderate-low	There are some ancient tracks and hedges within the Parish. Historic maps show that arable farming within the Parish has led to hedgerow loss. There is no parkland within the Parish, parkland at Caversham Park is separated from the farmland by modern housing estates.
<i>Relative TRANQUILLITY and peace on the doorstep of TEN MILLION PEOPLE, one of the most accessible protected landscapes in Europe; relatively dark skies, of great value to human and wildlife health; unspoilt countryside, secret corners and a surprising sense of remoteness.</i>	Moderate-low	The urban edge, main roads (A4155), pylons, telecommunication masts and overhead power lines mean that much of the Parish is not tranquil and dark skies are limited. Amalgamation of fields, hedgerow removal and quarry works means there has been a degradation of countryside within the Parish.
<i>Nationally important concentrations of CHALK GRASSLAND, extremely DIVERSE IN FLORA AND FAUNA, and home to some SCARCE AND THREATENED SPECIES. Once extensive, the chalk grassland now only covers 1% of the AONB mostly in small fragments.</i>	Low	There are no sites with national wildlife designations (such as SSSI) within the Parish. PLCA3A, 3B and 4 (north) are intensively farmed, limiting the diversity of habitats.
<i>One of the most WOODED LANDSCAPES IN ENGLAND, with 23% WOODLAND COVER concentrated in the central and southern areas; 56% OF THE WOODLAND is Ancient, a particularly rich, distinctive and prominent feature, including the Chilterns Beech Wood Special Area of Conservation; significant box, juniper and beech yew woods; many veteran trees, relict wood pasture.</i>	Low	Some large areas of woodland to the east and west of the Parish, but relatively little woodland within the Parish compared to the AONB. The landscape comprises a mix of open farmland and some smaller woodlands. The Chilterns Beech Wood Special Area of Conservation is not present in the Parish.
<i>NINE PRECIOUS CHALK STREAMS, a globally scarce habitat and home to some of the UK's most endangered species; numerous chalk springs occur along the base of the escarpment.</i>	Low	Chalk streams are not a feature of the Parish. Some springs within the dipslopes.
<i>An extensive and diverse ARCHAEOLOGICAL LANDSCAPE, including ancient parish boundaries, medieval field patterns and IRON AGE HILLFORTS; extensive remnants of woodland heritage including sawpits, charcoal hearths and wood banks.</i>	Low	There are few noted archaeology features or remnants of woodland heritage and no scheduled monuments. A mix of medieval enclosure and amalgamated fields.
<i>A DRAMATIC CHALK ESCARPMENT, a globally rare landscape type which gives rise to rare ecology and distinctive cultural heritage.</i>	None	Not a feature of the Parish.
<i>OVER 2000ha OF COMMON LAND, heaths and greens, RICH IN WILDLIFE and cultural heritage; 3700ha OF OPEN ACCESS LAND.</i>	Moderate-low	A village green at Playhatch but no commons, heaths or open access land.
<i>A dense network of 2000km of rights of way; two NATIONAL TRAILS, the Ridgeway and Thames Path; notable regional routes such as the CHILTERN WAY and the CHILTERN CYCLEWAY.</i>	Moderate-low	A number of 'other routes with public access' and some public rights of way, but routes are markedly less abundant than within the boundary of the AONB.
<i>An INDUSTRIAL HERITAGE around wood-working, furniture making, chalk quarrying, brick making, and food production with windmills and watercress beds.</i>	Moderate-low	Chalk pits and the modern Playhatch quarry but limited evidence of industrial heritage.
<i>DISTINCTIVE BUILDINGS made from local brick, flint and clay tiles; many ATTRACTIVE VILLAGES, popular places to live in and visit; many notable individual buildings and follies including STATELY HOMES, MONUMENTS and MAUSOLEUMS; a wealth of MEDIEVAL CHURCHES, many built from flint.</i>	Moderate-high	Attractive villages and hamlets. Some listed buildings of heritage value mixed with some small modern housing areas.
<i>Numerous ANCIENT ROUTEWAYS and SUNKEN LANES</i>	Moderate	Some ancient routeways and sunken lanes, including Foxhill Lane.

- 5.30. Para 4.13 states there is a high level of *'interconnectivity between the edge of the Chilterns AONB and the Parish with Public Rights of Way extending into the parish from the AONB, aligning along the AONB boundary while also permitting views across the parish.'*
- 5.31. I consider this is NOT correct. Figure 4 of the PLCA shows there is limited interconnectivity. In the north of the parish 2 PROW link the AONB to PLCA3B (FP205 19/10 – FP421 2/10 and FP205 2/10 – FP421 4/20). One footpath aligns along the boundary of the AONB (FP422 22/10). Views from these footpaths and others within the AONB across the Parish are restricted by woodlands and the ridge line, meaning that there are no views of PLCA4, PLCA3A, PLCA1, PLCA2 and only parts of PLCA3B and parts of PLCA4 (north of the ridge) may be visible.
- 5.32. Para 4.14 states that the previous paragraphs *'shows that the rest of the Parish falls within the setting of the AONB'*. This is NOT an objective conclusion. The CMP page 76 states:  
*'The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary. ... We consider that the setting of the Chilterns AONB is the area within which development and land management proposals (by virtue of their nature, size, scale, siting, materials or design) may have an impact, either positive or negative, on the natural beauty and special qualities of the area.'*
- 5.33. I consider it too simplistic to state that the rest of the Parish falls within the setting of the AONB. Much of the Parish can not be seen from within the AONB, and is not visible in views of the AONB.
- 5.34. The AONB was designated in 1965 and extended in 1990 *'in recognition of its fine landscape and unique features'*. Notably the extension did not include all the land in the Parish either in the original designation or the 1990 review. A detailed review of the AONB boundary is currently underway. It is premature for the PLCA to suggest that parts of the Parish are worthy of inclusion within the AONB extension.
- 5.35. I consider that the PLCA overplays the degree to which the AONB affects the value of landscape within the Parish.

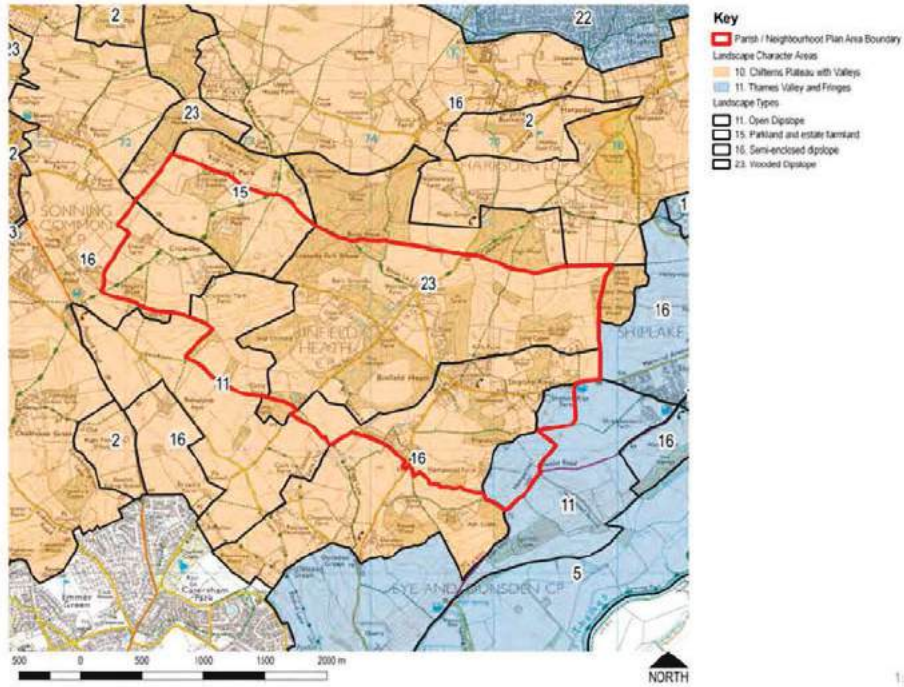
## Parish Character Area Reports

### PARISH LANDSCAPE CHARACTER AREAS

- 5.36. Para 5.1 states that:  
*'The parish has been subdivided into 4 individual Landscape Character Areas based on desk top study and visits to the area. Each of these has been assessed, ... adding a new level of detail appropriate to the unique setting within the parish.'*
- 5.37. There is no clear methodology to explain how the 4 LCA and their boundaries have been defined.
- 5.38. I would expect a Parish Landscape Character Assessment to base Parish (Local) Landscape Character Areas (LLCA) on the (District level) Landscape Character Types identified in the SOLCA'17. Each separate LLCA parcel should be assessed separately. It may also be appropriate to add an additional level of detail with some further sub-division as explained in page 9 of LSA'19 and shown in Fig 2.3 of LCA'02 (This is the outcome of the PLCA for the adjacent parish of Binsfield Heath prepared by Terra Firma in 2022 which divides the 4 LCTs into 7 Parish LCAs, as shown

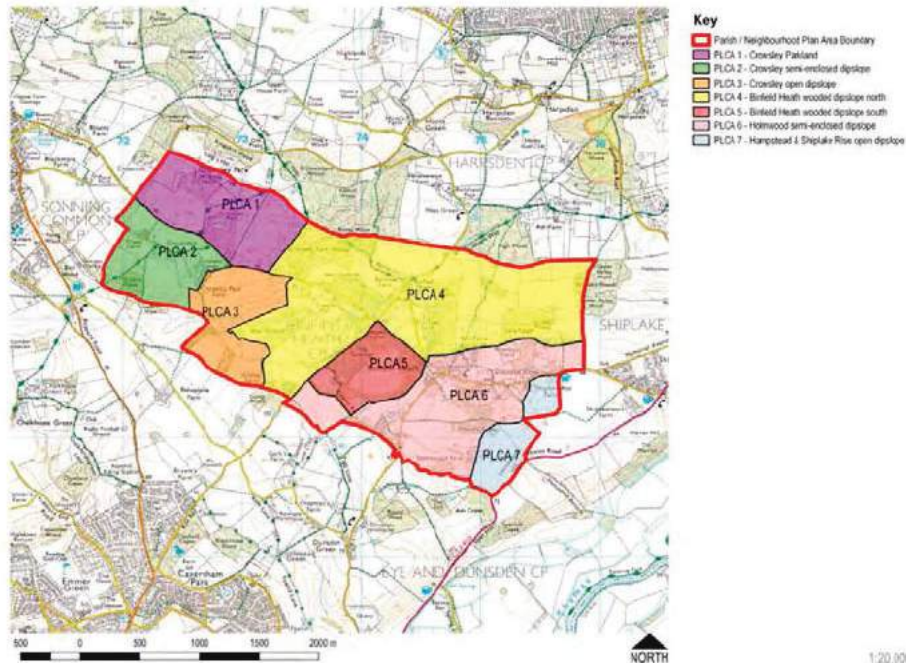
below.

Figure 2: Figures 10 and 11 from Binsfield Heath PLCA



1:20

Figure 10: SODC Landscape Character Areas and Landscape Types



1:20,000 (B)

Figure 11: Parish landscape character areas (PLCA)

5.39. Rather than adding an additional level of detail, the PLCA merges individual landscape character type parcels together for assessment that I consider would be perceived as separate parcels of landscape.

- 5.40. Parcels PLCA3A and PLCA3B should NOT be assessed as one unit. There is a physical separation between the two. They are on different sides of the central ridge with different topography and views. They are in different Regional level Landscape Character Areas in SOLCA'17. The EDNP (page 63) identifies the 'Dunsden' character area as clearly separating PLCA3A and PLCA3B. They are NOT perceived as a single area of landscape.
- 5.41. PLCA4 combines two LCT parcels from SOLCA'17 and provides a physical link where no such link is shown in SOLCA'17. Again, the EDNP (page 63) identifies the 'Dunsden' character area as clearly separating PLCA4 into two distinct parcels. PLCA4 should NOT be assessed as one LLC parcel. These are two distinct areas, one on each side of the ridge. No explanation is provided as to why they are joined. The northern and southern parts are on different sides of the central ridge with different topography and views. They are NOT perceived as a single area of landscape.
- 5.42. I do NOT consider that the Parish Landscape Character Areas are appropriate. They combine and merge LCTs from the SOLCA'17 rather than refining them to a finer level detail for assessment.

#### PARISH (LOCAL) LANDSCAPE CHARACTER AREA (LLCA) DESCRIPTIONS

- 5.43. The PLCA goes on to cover each LLCA. It provides a description of the landscape, it notes if different SOLCA'17 LCT cover each LLCA and describes what historic landscape character types each LLCA contains. Despite this level of description it does not suggest further subdivision to take account of these differences within each LLCA.
- 5.44. The PLCA then introduces a list of 'Key Valued Landscape Characteristics' and 'Key Valued Visual Characteristics' specific to each LLC. There is no explanation of why the term 'Valued' is being used. These terms do not comply with LCA guidance (ALCA'14, LCA'02). These terms are not included in the Glossary.
- 5.45. There is no value applied to these There is no clear transparent methodology to explain why these characteristics are 'Valued'. There is no judgement provided as to the relative value of these characteristics.
- 5.46. The PLCA then includes guidance regarding land management and development for each LLPCA, taken from SOLCA'17.
- 5.47. Each LLPCA section concludes by stating why it believes that area of the Parish '*is (should be) regarded as Valued Landscape*' with no objective evidence or justification using current guidance on Valued Landscape (TGN'21).

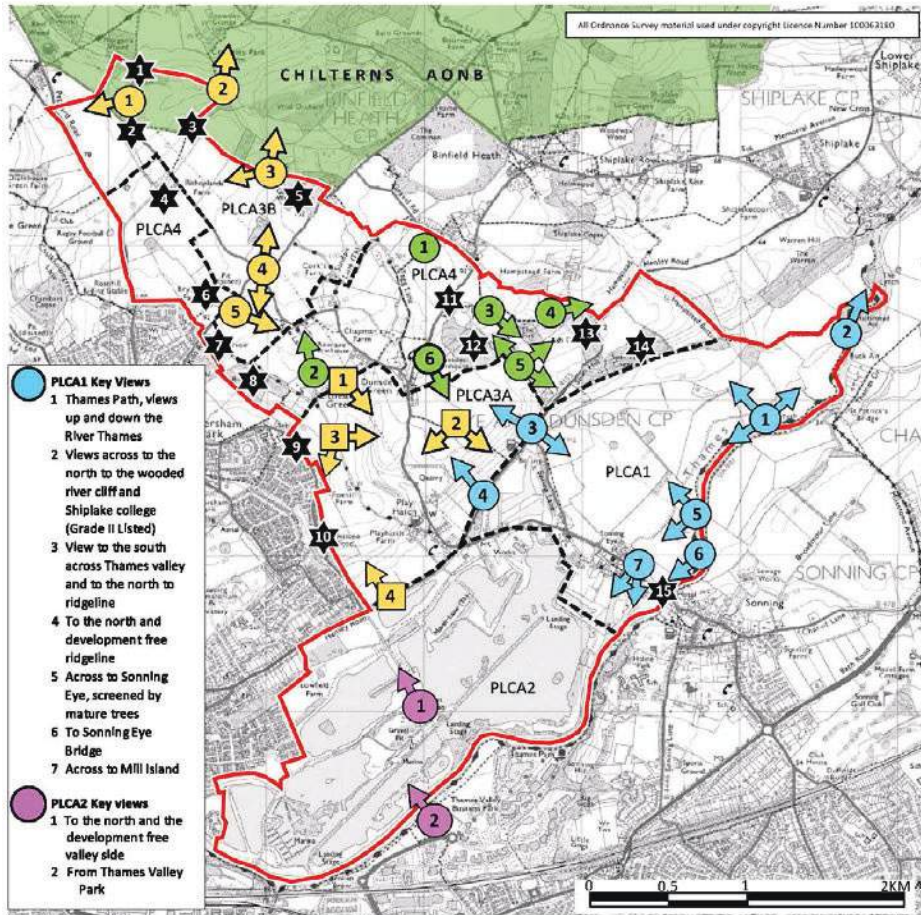
#### Key Views and landmarks

- 5.48. Key views are discussed for each LLPCA and are identified in Figure 7: Key Visual Attributes (reproduced in fig 3 below), as well as landmarks.
- 5.49. The terms 'Key View' and 'Landmark' are not explained and do not appear in the Glossary.
- 5.50. GLVIA3 gives guidance on the assessment of views. Para 6.13 explains that it is the people that will be affected by any change in view that area the 'visual receptor'. Para 6.14 explains that people have different responses to change in views depending on the context. Para 6.15 explains that the type of viewers who will be affected should

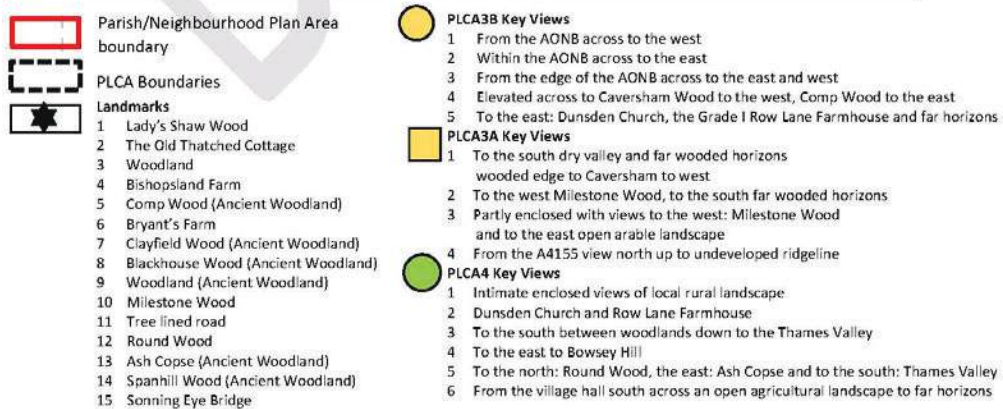
be identified.

**Figure 3: PLCA Figure 7: Key Visual Attributes**

DRAFT x 12 26<sup>th</sup> April 2022 EYE & DUNSDEN LANDSCAPE CHARACTER ASSESSMENT AND PROPOSAL FOR A LOCAL VALUED LANDSCAPE



**FIGURE 7: Key Visual Attributes**



5.51. Para 6.33 explains that the people most susceptible to visual change are likely to include people engaged in outdoor recreation whose attention is likely to be focused on the landscape and on particular views. Travellers on

roads generally have a moderate susceptibility to changes in views, whilst people at their place of work are amongst the least susceptible.

5.52. I consider that 'key views' should be those experienced by people engaged in outdoor recreation where the view is the focus of their attention and is more noticeable, memorable or dramatic than a regular view. A key view may also be experienced from roads where it is a clear forward view (or slightly oblique) and also memorable or dramatic. I do NOT consider that being able to see one area of landscape from a particular location means that it is a key view.

5.53. The locations of identified 'Key views' were visited during the site visit on 5-1-24. Due to time constraints, it was not possible to visit all locations in the Semi-enclosed Dipslope area. Photographs were taken from those locations visited and are presented in Appendix A together with a commentary on whether I consider they should be identified as 'key views'. From my site visit and assessment of the identified 'Key views', I consider the following are important considerations relating to the PLCA's description of the views:

5.54. PLCA1 Key Views:

3: I do NOT consider this a key view. This is a view from a minor road junction. Looking north, the view is of a mature hedge on top of an embankment directly in front of the viewer. This screens any view of the landscape behind it even in winter when leaves have fallen. It should be noted that visual receptors (users of this route) should have their vision focused on other road users rather than the surrounding landscape. I do not consider it a key view for anyone involved in outdoor recreation or a key view for a road user.

4: Road users traveling north along this route do experience a dramatic reveal of the open hillside at this point, but it is in a more northerly direction than the arrow shows.

3 & 4: The EDNP (page 93) identifies these as a section of road with where traffic incidents have occurred. It should be noted that visual receptors (users of this route) should have their vision focused on other road users rather than the surrounding landscape.

5.55. PLCA2 Key Views:

1: I do NOT consider this a key view. People using this lane are likely to be travelling to/from to their place of work or to a water-based recreation activity. Their attention is less likely to be focused on distant views of a valley side. There is only a narrow, sliver of a distant view of the western most edge of the open dipslope. I do not consider that this view of the valley side is dramatic, memorable or particularly noticeable.

2: The key view is of the landscape of the valley bottom. Mature trees and the landform screen any views of the open valley sides.

5.56. PLCA3A Key Views:

2: This viewpoint was not visited.

3: These are NOT key views. Foxhill Lane is a sunken lane with tall mature trees on both sides. There are no significant views to the west or east, as described in the PLCA.

4: This is NOT a key view. There is a tall mature hedge along the northern side of the road which screens and

filters views of the hillside behind it for both pedestrians on the northern footpath and road users. The hill does not form the skyline view above the hedge. The forward view for travellers in both directions along the road does not include the hillside. The EDNP (page 93) identifies this as a section of road with a constrained junction where traffic incidents have occurred. It should be noted that visual receptors (users of this route) should have their vision focused on other road users rather than the surrounding landscape.

5.57. PLCA3B Key Views:

3: I do NOT consider these key views. There is NO key view north from this section of PROW as suggested by the arrow. Views north are screened by a mature hedge directly in front of the viewer. Views west are restricted by landform and vegetation so only the field immediately west and south of the viewer is visible. Beyond that, roadside and field hedges and trees, screen and filter longer views. The roof tops of houses and the water tower at Emmer Green are visible in the mid to distant views. I do not consider that this is anything more than a regular view.

4: I do NOT consider these key views. This is not a dramatically elevated viewpoint. There are views of the woodland to the east and west, but I do not consider these to be particularly dramatic or memorable.

5.58. PLCA4: Key views:

1: This viewpoint was not visited.

2: Mature vegetation means that Dunsden Church is not visible from any location along this lane, even in winter when leaves have fallen. The farmhouse is adjacent to the lane and whilst it is an attractive building, I do NOT consider it to be any more of a 'key view' than the view of any other attractive building.

3 – 6: These view points were not visited.

5.59. I do NOT consider that these are all 'Key views'. In some instances, these are no more than regular views of the landscape, or the view described was not visible or was partly or wholly screened. In other instances, the viewer (visual receptor) would not be considered a high sensitivity receptor or their view would not be focused on the view described.

5.60. Figure 7 also identifies 'Landmarks'. Oxford Languages defines a 'landmark' as:

*'an object or feature of a landscape or town that is easily seen and recognized from a distance, especially one that enables someone to establish their location.'*

5.61. Collins Dictionary defines 'landmark' as:

*'A landmark is a building or feature which is easily noticed and can be used to judge your position or the position of other buildings or features.'*

5.62. Simply being a landscape feature, does not mean that it is a landmark. Woodland and farmsteads are identified as being common characteristics of the area. To stand out as an easily recognised feature, from a distance, there would have to be something markedly unusual about a woodland or farmstead. Of the 15 landmarks identified, the only ones I consider meet the above definitions are:

- The Old Thatched Cottage

- Sonning Eye Bridge.

5.63. I do NOT consider the majority of the features listed to be landmarks, as commonly understood and defined.

#### Local Valued Landscape

5.64. For each LLCA it concludes with a sub-section headed 'Local landscape Value'. This term is not explained and is not included in the Glossary.

5.65. Each conclusion has a table that purports to justify why the landscape is well above 'ordinary countryside' and should be considered as a 'Valued Landscape'. The 'Factors' included in the tables are taken from GLVIA3 rather than the more up-to-date TGN'21.

5.66. The 'Evidence' only considers positive factors and gives no indication of the level of importance within the LLLCA, ranking each from Low – High, as recommended in current guidance. TGN'21 is clear that both positive and negative factors should be considered. There is no judgement of relative value so it is NOT possible to see how each LLCA is elevated above 'ordinary countryside.'

5.67. The 'Evidence' includes reference to the former local landscape designation despite there being no evidence as to why the area was included within this designation and despite the LI recommending that inclusion in former local landscape designations should NOT be a factor in determining landscape value (TGN'21 A4.2.7-8).

5.68. The 'Evidence' also includes factors that the Stroud Case demonstrated do not necessarily lead to an area being judged to be Valued Landscape. Such factors include:

1. Proximity to an AONB.
2. Views of an AONB.
3. Presence of well used PRow.
4. Contribution to Conservation Areas.
5. Contribution to visual amenity.
6. Use for recreation.

5.69. TGN'21 is clear that having judged each Factor, it is important to judge the overall 'weight of evidence' in coming to an overall judgement on landscape value for any landscape unit. No such overall judgement is provided.

5.70. The tables, including the factors and description of evidence within them do NOT follow current guidance. They do NOT present clear transparent evidence of value and present no judgement of relative value. As such, they have no merit in identifying 'Valued Landscape'.

### Recommended Local Valued Landscape

5.71. Section 6 of the PLCA recommends that ALL the land within the Parish meets the criteria of 'Local Valued Landscape'. In order to make this judgement the PLCA has combined positive attributes of all the LLCA and combined them to cover the whole of the Parish. This does not follow recognised guidance in TGN'21, LCA'14 and recent Inspector's decisions that suggests the opposite: that LLCA may be subdivided to a finer grain of landscape parcels when judging value, rather than combined into a Parish wide area. The Parish as a whole is NOT perceived

as a single landscape unit and should not be assessed as such. This is NOT recommended methodology for assessing landscape value or making judgements regarding 'Valued Landscapes'.

- 5.72. The attributes used are based on the criteria of box 5.1 of GLVIA3. This does not follow recognised guidance in TGN'21. This is NOT recommended methodology for assessing landscape value or making judgements regarding 'Valued Landscapes'.
- 5.73. It is a fact that some areas of landscape within the Parish will be of lesser value than others. One of the purposes of a landscape value assessment should be to judge relative value as: High; High/Medium; Medium; Medium/Low; Low (LSA'19).
- 5.74. TGN'21 (A4.2.12) recognises that what may be defined as reaching the 'Valued Landscape' threshold/criteria in one part of the Country may be considered to be an 'everyday landscape' in another and there should be a weight of evidence that supports the recognition of a landscape as valued above more everyday landscapes. It is clear that the identification of landscape value needs to be applied proportionately ensuring that identification of 'Valued Landscape' is not overused.
- 5.75. I consider that some areas of the Parish must be considered as everyday landscapes for this part of the Country. Identifying the WHOLE of the Parish as 'Valued Landscape' and therefore all of it as being elevated above everyday landscapes, devalues the point of identifying areas of highest landscape value. I consider that the identification of landscape value has NOT been applied proportionately, and that the identification of 'Valued Landscape' has been overused, contrary to the guidance given in TGN'21 (A4.2.12).
- 5.76. The conclusion in para 6.30 of the PLCA states that:  
*'the parish which includes PLCA1, PLCA2, PLCA3A, PLCA3B and PLCA4 should be included collectively as a Local Valued Landscape and would therefore fall under national guidance NPPF (2021) paragraph 174 (a)'*  
 [now para 187].
- 5.77. I do NOT consider this is a robust or accurate conclusion. It is NOT based on any clear, transparent methodology, it does NOT follow current guidance and it fails to recognise what does and what does NOT constitute 'Valued Landscape' in terms of TGN'21.

## Summary of the Eye & Dunsden Parish Landscape Character Assessment

1. The PLCA has not followed guidance in ALCA'14 or GDLLA'20. It combines LCAss descriptions with judgements regarding value. I do not consider the distinction between these two separate aspects is clearly set out in the PLCA.
2. The PLCA has not followed guidance in GDLLA'20. No ranking is given nor is the relative value of each landscape unit presented in a systematic, criteria-based manner, and given values such as 'high', 'medium' or 'low'
3. The PLCA has not followed guidance from GDLLA'20. Rather than carry out a more detailed LCAss, the PLCA combines LCA into larger parcels for assessment, and concludes by assessing the whole Parish as one landscape unit.
4. It is the factors in TGN'21, Table 1 that should be considered when assessing landscape value to ensure

the assessment follows the most up-to-date guidance. This has not been used in the PLCA.

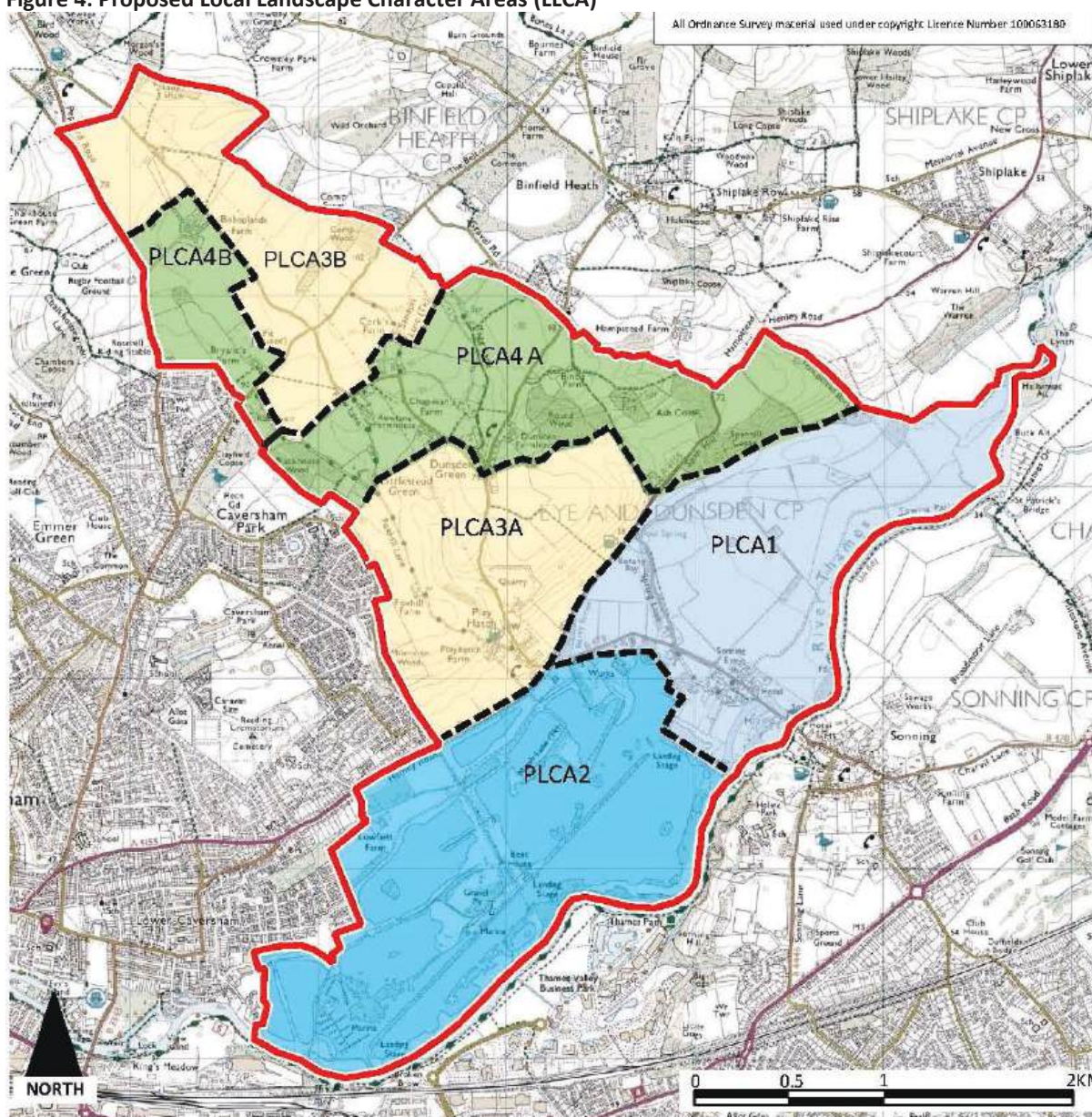
5. The PLCA does NOT include a methodology or reference to a methodology. It does NOT provide a clear and transparent evidence base.
6. the PLCA is wrong to state that GLVIA3 paras 5.26 to 5.31 identify criteria for 'Valued Landscapes' in the terms of NPPF. The PLCA does NOT follow the latest guidance on assessing landscape value from TGN'21.
7. The broad description of landscape setting includes some errors and emphasis that could inflate the value of the landscape in later sections. It fails to point out that the high point is part of an east west ridge, creating two distinctively different areas of slope/aspect/view within the Parish, as shown on figure 5 of the PLCA and figure 20 of the EDNP.
8. The PLCA does not differentiate between the relative condition / values of the different LCT nor does it agree with the SOLCA'03 judgement that the 'Open dipslopes' were judged to be 'not 'special' or distinctive to quite the same degree as the other LCTs.
9. There are a number of inconsistencies between the PLCA description of landscape character context and the SOLCA'17 description of landscape character context.
10. The PCA does NOT provide an objective comparison of all special qualities of the AONB and the degree to which the Parish landscape shares those qualities.
11. The PLCA is incorrect to state that there is a high level of 'interconnectivity between the edge of the Chilterns AONB and the Parish'.
12. The PLCA is incorrect to suggest that the Parish (as a whole, or most of) is visible from the AONB.
13. The PLCA is incorrect to state that most of the Parish falls within the setting of the AONB.
14. I consider that the PLCA overplays the degree to which the AONB affects the value of landscape within the Parish.
15. The PLCA provides no clear methodology to explain how the 4 LCA and their boundaries have been defined.
16. I do NOT consider that the Parish Landscape Character Areas are appropriate. There should be at least 6 PLCA rather than the 4 assessed.
17. I consider that the PLCA wrongly identifies a number of key views.
18. I consider that the PLCA wrongly identifies a number of landmarks.
19. The factors used to justify why the landscape is above ordinary are NOT taken from current guidance.
20. The PLCA fails to include an assessment of negative factors.
21. The PLCA fails to make judgements of relative value so it is NOT possible to see how each LLCA is elevated above 'ordinary countryside.'
22. The PLCA should NOT include local landscape designations as a factor in determining landscape value.
23. The PLCA should NOT assume that factors of individual value necessarily lead to an area being judged to be Valued Landscape.
24. The PLCA does NOT judge the overall 'weight of evidence' in coming to an overall judgement on landscape value for any landscape unit
25. The conclusion of the PLCA that ALL land within the Parish should be 'Valued Landscape' is NOT an accurate or robust conclusion. It has NOT been applied proportionately, and it demonstrates that the identification of 'Valued Landscape' has been overused, contrary to the guidance given in TGN'21. It is NOT based on any clear, transparent methodology, it does not follow current guidance and it fails to recognise what does and what does not constitute 'Valued Landscape' in terms of TGN'21 and the NPPF.

## 6. Value Assessment of the Parish Landscape Character Areas

### Refined Parish Landscape Character Areas

6.1. This section of the Review provides an alternative table for 6 LLCA (see fig 4 below). The areas are based on the Parish Landscape Character Areas identified in the PLCA, but PLCA3 and PLCA4 are each divided into two separate areas as suggested in para 5.13, 5.40 - 41 (above). The range of factors is based on those given in TGN'21 and provides a judgement and ranking ranging from High to Low regarding their relative value. An overall judgement of value is then given for each LLCA and a comment on whether or not it is considered to be *“an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes.”*

Figure 4: Proposed Local Landscape Character Areas (LLCA)



6.2. The proposed Local Landscape Character Areas are:

- LLCA1 as PLCA1 (River Thames and Meadows)
- LLCA2 as PLCA1 (River Thames, Meadows and Lakes)
- LLCA3A as PLCA3A (Dunsden Open Dipslopes south)
- LLCA3B as PLCA3B (Dunsden Open Dipslopes north)
- LLCA4A as PLCA4 (south of the ridge) (Dunsden Semi-enclosed dip-slopes south)
- LLCA4B as PLCA4 (north of the ridge) (Dunsden Semi-enclosed dip-slopes north)

6.3. The following tables assesses landscape value of each of the six LLCAs based on the range of factors recommended in TGN'21 table 1.

**Table 2:** Landscape value of LLCA1: River Thames and Meadows

Criteria for establishing value	Observations/comments	Value
<b>National designations attached to the landscape</b>	None	<b>None</b>
<b>Natural heritage</b>	High ecological interest. Semi-natural habitat that is characteristic of the landscape type. Distinctive valley bottom/river feature. Valued natural capital asset – distinctive ecological communities. Key area of green/blue infrastructure	<b>High</b>
<b>Cultural heritage</b>	Sonning Eye Conservation Area 15 listed buildings/structures Setting for Sonning Eye bridge. Thames river has association with many past activities	<b>High</b>
<b>Landscape condition</b>	Strong landscape structure. Good physical condition and intactness. Few incongruous features.	<b>High</b>
<b>Associations</b>	Extensive associations for the River Thames	<b>High</b>
<b>Distinctiveness</b>	Strong sense of place. Distinctive features of the river and flood plain/ meadows. High contribution to identity of settlement. Settlement gateway.	<b>High</b>
<b>Recreational</b>	Thames path national trail. River based activities.	<b>High</b>
<b>Perceptual (Scenic)</b>	Strong aesthetic qualities of river and meadow landscape. Harmonious combinations of land cover. Distinctive landscape features. Visual diversity.	<b>High</b>
<b>Perceptual (Wildness and tranquillity)</b>	High perception of tranquillity. Relative perception of wildness from high degree of naturalistic landscape	<b>Medium high</b>
<b>Functional</b>	Important function for water management and control, hydrological system and floodplain. Important part of multi-functional green infrastructure	<b>High</b>
<b>Overall Judgement of landscape value:</b>		<b>HIGH</b>
The overall 'weight of evidence' does suggest that it is 'out of the ordinary' for this part of the Country. It SHOULD be considered as 'Valued Landscape' for the purposes of the NPPF.		

**Table 3:** Landscape value of LLCA2: River Thames and Meadows and Lakes

Criteria for establishing value	Observations/comments	Value
<b>National designations attached to the landscape</b>	None	<b>None</b>
<b>Natural heritage</b>	High ecological interest. Semi-natural, restored habitat that is characteristic of the landscape type. Distinctive valley bottom/wetland/river feature. Valued natural capital asset – distinctive ecological communities. Key area of green/blue infrastructure	<b>High</b>
<b>Cultural heritage</b>	Thames river has association with many past activities	<b>Medium</b>
<b>Landscape condition</b>	Restored gravel pits Strong landscape structure. Good physical condition. Presence of Pylons and overhead power lines Presence of boat yards and parking areas with obtrusive palisade fencing.	<b>Medium</b>
<b>Associations</b>	Extensive associations for the River Thames	<b>Medium-high</b>
<b>Distinctiveness</b>	Strong sense of place. Distinctive features of the river and flooded gravel pits.	<b>Medium-high</b>
<b>Recreational</b>	Thames path national trail. Many River based activities.	<b>High</b>
<b>Perceptual (Scenic)</b>	Strong aesthetic qualities of river and lakes. Harmonious combinations of land cover. Distinctive landscape features. Visual diversity. Detracting features of pylons and overhead power lines, boat yards and parking areas with obtrusive palisade fencing.	<b>Medium-high</b>
<b>Perceptual (Wildness and tranquillity)</b>	Low tranquillity and wildness due to abundance of water based activities and facilities.	<b>Low</b>
<b>Functional</b>	Important function for water management and control, hydrological system and floodplain. Regional recreation area Important part of multi-functional green infrastructure	<b>High</b>
<b>Overall Judgement of landscape value:</b>		<b>HIGH</b>
Whilst the LLCA does have many Medium value contributing factors, its high value for recreation and functionality means that the overall 'weight of evidence' does suggest that it is 'out of the ordinary' for this part of the Country. It SHOULD be considered as 'Valued Landscape' for the purposes of the NPPF.		

**Table 4:** Landscape value of LLCA3A: Dunsden Open Dipslopes South

Criteria for establishing value	Observations/comments	Value
<b>National designations attached to the landscape</b>	None. The area can not be seen from the AONB and has no PROW linking it directly to the AONB	<b>None</b>
<b>Natural heritage</b>	There are no significant areas of woodland or semi-natural habitat except for the sinuous woodland in the field east of Foxhill Lane. There are mature roadside hedges and some hedges creating boundaries between fields. The steep dipslope is a distinctive geological feature as are the semi-dry valleys that run down the area. The small quarry harms the natural heritage and geology of part of the area.	<b>Medium-low</b>
<b>Cultural heritage</b>	There are no historic landmark structures or designated landscape elements. Foxhill lane is a historic sunken lane. There are 5 listed buildings within the rural hamlet of Playhatch.	<b>Medium-high</b>
<b>Landscape condition</b>	Historic mapping shows that the area suffers from hedgerow removal and field amalgamation. There are some detracting features including pylons, overhead power lines and the Quarry.	<b>Low</b>
<b>Associations</b>	There is no evidence of any association with artists, writers or historical events.	<b>Low</b>
<b>Distinctiveness</b>	The topography of the dipslopes and dry-valleys creates a strong sense of identity and contributes to the sense of place of Playhatch	<b>Medium-high</b>
<b>Recreational</b>	There are 2 PROW within the area. There are no areas of open access land, village greens, play areas or sports areas. There is a small area of allotments within Playhatch. There is limited visibility of the area from landscapes of recreational activity, other than the PROW and sunken lane identified above.	<b>Medium-low</b>
<b>Perceptual (Scenic)</b>	The landform of the area is distinctive and dramatic. Whilst this can be appreciated from lanes and PROW within the area the sunken nature of lanes and mature hedges limit views of the landform. The hamlet of Playhatch has many attractive buildings and combinations of buildings. There is little visual diversity due to large amalgamated fields. The presence of masts and overhead power lines detract from the scenic value Vegetation and landform limit views of the area from outside the area.	<b>Medium</b>
<b>Perceptual (Wildness and tranquillity)</b>	No wild land. A rural landscape but presence of the A4155, masts and overhead power lines limits of remoteness and tranquillity	<b>Medium-Low</b>
<b>Functional</b>	The rural land within the study area functions primarily as agricultural land. The farmland has limited ecological value/natural function.	<b>Medium</b>
<b>Overall Judgement of landscape value:</b>		<b>MEDIUM</b>
Whilst the LLCA does have some Medium-high value contributing factors, the overall 'weight of evidence' does not suggest that it is 'out of the ordinary' for this part of the Country. It should NOT be considered as 'Valued Landscape' for the purposes of the NPPF.		

**Table 5:** Landscape value of LLCA3B: Dunsden Open Dipslopes North

Criteria for establishing value	Observations/comments	Value
<b>National designations attached to the landscape</b>	The northern part is within the AONB, but the majority of the area has been excluded from the AONB. Northern parts of the area can be seen from the edges of the AONB. 2. PROW link it directly to the AONB	<b>Medium-high</b>
<b>Natural heritage</b>	There are some areas of woodland, mainly along the northern edges of the area, one of which is ancient. There are mature roadside hedges and some hedges creating boundaries between fields. The gently undulating topography is not particularly distinctive or unusual.	<b>Medium</b>
<b>Cultural heritage</b>	There are no historic landmark structures or designated landscape elements. 'Old Thatched Cottage' is a listed building. There are listed buildings adjacent to the area within LLCA4A and LLCA4B.	<b>Medium</b>
<b>Landscape condition</b>	Historic mapping shows that the area suffers from hedgerow removal and field amalgamation, although some historic fields remain. There are some detracting features including pylons and overhead power lines.	<b>Medium-low</b>
<b>Associations</b>	'Old Thatched Cottage' has associations with Wilfrid Owen	<b>Medium-high</b>
<b>Distinctiveness</b>	There is little to distinguish much of this area with the adjacent LLCA4B with no obvious boundary on the ground.	<b>Low</b>
<b>Recreational</b>	There are 4 PROW routes within the area, 3 of which provide direct access to the AONB. Parts of the area are visible from the AONB There are no areas of open access land, village greens, allotments, play areas or sports areas.	<b>Medium</b>
<b>Perceptual (Scenic)</b>	There are few positive, distinctive features. Parts of the area can be seen from the edges of the AONB. There is little visual diversity due to large amalgamated fields. The presence of masts and overhead power lines detract from the scenic value.	<b>Medium</b>
<b>Perceptual (Wildness and tranquillity)</b>	No wild land. A rural landscape but presence of roads, masts and overhead power lines limits of remoteness and tranquillity	<b>Medium-Low</b>
<b>Functional</b>	The rural land within the study area functions primarily as agricultural land. The farmland has limited ecological value/natural function.	<b>Medium</b>
<b>Overall Judgement of landscape value:</b>		<b>Medium</b>
<b>Whilst the LLCA does have some Medium-high value contributing factors, the overall 'weight of evidence' does not suggest that it is 'out of the ordinary' for this part of the Country. It should NOT be considered as 'Valued Landscape' for the purposes of the NPPF (apart from the area within the AONB).</b>		

**Table 6:** Landscape value of LLCA4A (Dunsden Semi-enclosed dip-slopes south)

Criteria for establishing value	Observations/comments	Value
<b>National designations attached to the landscape</b>	None. The area can not be seen from the AONB and has no PROW linking it directly to the AONB	<b>Low</b>
<b>Natural heritage</b>	There are many small areas of woodland throughout the area 2 of which are ancient. There are mature roadside hedges and hedges creating boundaries between fields. The area forms a gentle ridge within the wider landscape.	<b>Medium-high</b>
<b>Cultural heritage</b>	There are no historic landmark structures or designated landscape elements. There is a war memorial on the village green at Dunsden. There are 7 listed buildings within the area.	<b>Medium-high</b>
<b>Landscape condition</b>	Historic field pattern is largely intact throughout the area. There are some detracting features including pylons and overhead power lines but these are restricted to a relatively small part of the area.	<b>Medium-high</b>
<b>Associations</b>	Associations with Wilfrid Owen	<b>Medium</b>
<b>Distinctiveness</b>	There is a strong sense of place due to the intimate nature of spaces and enclosure provided by hedges and woodlands. The small hamlets and farmsteads are distinctive features as is the Church. Although distinctive, this is not an unusual landscape for the wider area.	<b>Medium-high</b>
<b>Recreational</b>	There are 5 or 6 PROW routes within the area, none of which provide direct access to the AONB. There is a village green and community orchard at Dunsden There are no areas of open access land, allotments, play areas or sports areas.	<b>Medium-high</b>
<b>Perceptual (Scenic)</b>	The combination of woodlands, hedgerows, PROW and attractive hamlets and farmsteads create a landscape with strong aesthetic qualities. The presence of masts and overhead power lines slightly detract from the scenic value.	<b>Medium-high</b>
<b>Perceptual (Wildness and tranquillity)</b>	No wild land. A rural landscape but presence of roads, hamlets, farmsteads masts and overhead power lines limits of remoteness and tranquillity	<b>Medium-Low</b>
<b>Functional</b>	The rural land within the study area functions primarily as agricultural land. The farmland has limited ecological value/natural function.	<b>Medium</b>
<b>Overall Judgement of landscape value:</b>		<b>Medium-high</b>
<p><b>Whilst the LLCA is considered Medium-high value, the overall 'weight of evidence' does not suggest that it is 'out of the ordinary' for this part of the Country (when areas within this part of the Country [AONB/NL] are of national value). It should NOT be considered as 'Valued Landscape' for the purposes of the NPPF.</b></p>		

**Table 7:** Landscape value of LLCA4B (Dunsden Semi-enclosed dip-slopes north)

Criteria for establishing value	Observations/comments	Value
<b>Designations attached to the landscape</b>	None. The area can be seen from the AONB but such views include adjacent houses in Emmer Green.	<b>Low</b>
<b>Natural heritage</b>	There are no significant areas of woodland. There are 2 field ponds with associated mature trees and shrubs in what are believed to be small, historic quarry pits . There are mature roadside hedges and some hedges creating boundaries between fields. The gently undulating topography is not particularly distinctive or unusual.	<b>Medium</b>
<b>Cultural heritage</b>	There are no historic landmark structures or designated landscape elements. There are 5 listed buildings at Bishoplands Farm.	<b>Medium</b>
<b>Landscape condition</b>	Historic mapping shows that the area suffers from hedgerow removal and field amalgamation, although some historic fields remain. There are some detracting features including roads and adjacent 20C housing.	<b>Medium-low</b>
<b>Associations</b>	There is no evidence of any association with artists, writers or historical events.	<b>Low</b>
<b>Distinctiveness</b>	There is little to distinguish much of this area with the adjacent LLCA3B with no obvious boundary on the ground.	<b>Low</b>
<b>Recreational</b>	There is 1 PROW routes within the area which does not provide access to the AONB. There are no areas of open access land, village green, allotments, play areas or sports areas.	<b>Medium-low</b>
<b>Perceptual (Scenic)</b>	There are few positive, distinctive features. Parts of the area can be seen from the edges of the AONB but these views include adjacent houses. There is little visual diversity due to large amalgamated fields. The roads and adjacent housing detract from the scenic value.	<b>Low</b>
<b>Perceptual (Wildness and tranquillity)</b>	No wild land. A rural landscape but presence of roads, and adjacent housing limits of remoteness and tranquillity	<b>Low</b>
<b>Functional</b>	The rural land within the study area functions primarily as agricultural land. The farmland has limited ecological value/natural function.	<b>Medium</b>
<b>Overall Judgement of landscape value:</b>		<b>Medium-low</b>
The overall 'weight of evidence' does not suggest that it is 'out of the ordinary' for this part of the Country. It should NOT be considered as 'Valued Landscape' for the purposes of the NPPF.		

## Summary of findings

6.4. Assessment of value for each of the Local Character Areas can be summarised as:

- LLCA1: River Thames and Meadows **High Value – 'Valued Landscape'**
- LLCA2: River Thames, Meadows and Lakes **High Value – 'Valued Landscape'**
- LLCA3A: Dunsden Open Dipslopes south **Medium value** (not out of the ordinary)
- LLCA3B: Dunsden Open Dipslopes north **Medium value** (not out of the ordinary)
- LLCA4A: Dunsden Semi-enclosed dip-slopes south **Medium-high value** (not out of the ordinary)
- LLCA4B: Dunsden Semi-enclosed dip-slopes north **Medium-low value** (not out of the ordinary).

## 7. Summary and Conclusions

### Landscape Character Assessments:

- 7.1. A Landscape Character Assessment:
1. Identifies and describes characteristics that make different landscapes distinctive.
  2. Maps and describes these different landscapes as Landscape Character Areas and/or Landscape Character Types.
  3. Can be carried out at National/Regional, County/District or Local level.
  4. Provides the spatially referenced framework on which follow on judgements may be based.
  5. Is a neutral baseline. Any judgement regarding the value of characteristics or the value of Areas or Types should be part of a separate section or document.
- 7.2. The PLCA has not followed guidance in ALCA'14. It combines LCAss descriptions with judgements regarding value. I do not consider the distinction between these two separate aspects is clearly set out in the PLCA.

### Local Landscape Area (LLA) Designations

- 7.3. Important aspects of LLA are:
1. The latest relevant guidance is TGN'21 and GDLLA'20.
  2. Existing landscape studies should guide the selection of candidate LLAs, and new studies can enhance understanding of local landscapes.
  3. Local authorities with nationally designated areas need to carefully consider their LLA designations, exploring how LLAs relate to national and local policies.
  4. A robust assessment methodology is crucial for evaluating landscapes suitable for designation. This includes systematic ranking based on qualitative descriptions, identifying special characteristics, and providing justifiable conclusions.
  5. The Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be necessary to carry out a more detailed LCAss.
  6. The relative value of each landscape unit should be assessed in a systematic, criteria-based manner, and be given values such as 'high', 'medium' or 'low'. Such an evaluation can identify areas ranked highly as candidates for designation
  7. The designation process identifies more specific, higher merit landscape areas compared to broader classifications in LCAss.
  8. GDLLA'20 encourages naming LLAs in a standardized format and provides guidelines for writing a Statement of Importance for each area. This statement should detail the reasons for designation, landscape description, values, boundaries, and justifications.
  9. The protection level granted to LLAs is determined by each authority's Development Plan policy, which should be less stringent than that for national or international designations.
  10. Overall, there should be a systematic, informed approach to LLA designation, integrating local studies and policies while ensuring clear communication of each area's significance.
  11. The PLCA has not followed guidance in GDLLA'20. No ranking is given nor is the relative value of each landscape unit presented in a systematic, criteria-based manner, and given values such as 'high', 'medium' or 'low'

12. The PLCA has not followed guidance from GDLLA'20. Rather than carry out a more detailed LCAss, the PLCA combines LCA into larger parcels for assessment, and concludes by assessing the whole Parish as one landscape unit.

## Landscape Value Assessment

### 7.4. Important aspects of Landscape Value Assessment are:

1. All landscapes have some value.
2. Landscape may be valued by different stakeholders for a variety of reasons.
3. Value can apply to areas of landscape as a whole, or to the individual elements, features and aesthetic or perceptual dimensions which contribute to the character of the landscape.
4. Value is best appreciated at the scale at which a landscape is perceived.
5. I consider that Local Level Landscape Character Areas (or their sub-division) are the appropriate landscape parcels for an assessment of landscape value within a Neighbourhood Plan.
6. For areas with no statutory status, and/or areas with historic local landscape designations, an evidence-based approach should be used to judge value.
7. Evidence in reaching judgements includes:
  - o factors set out in TGN'21 Table 1;
  - o the presence of qualities in the landscape that are identified in the development as requiring protection.
8. There is no definitive threshold above which a landscape is considered to be a 'Valued Landscape'.
9. It is the factors in TGN'21 Table 1 that should be considered when assessing landscape value to ensure the assessment follows the most up-to-date guidance.
10. 'Valued Landscape' is defined in TGN'21 as:
 

*"an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes."*
11. 'Valued Landscape':
  - o is that which is "out of the ordinary".
  - o must be more than simply popular.
  - o Have demonstrable attributes which would take the area beyond mere countryside.
12. The presence of high value attributes does not necessarily lead to an area being judged to be 'Valued Landscape'. Such attributes include:
  - o Proximity to an AONB.
  - o Views of an AONB.
  - o Presence of well used PRow.
  - o Contribution to Conservation Areas.
  - o Contribution to visual amenity.
  - o Use for recreation.
13. The judgement on landscape value should be presented using a verbal scale such as: High; High/Medium; Medium; Medium/Low; Low.
14. It is important to judge the overall 'weight of evidence' in coming to an overall judgement on landscape value.
15. Overlaps between the factors, as well as overlaps with other specialist studies should be acknowledged and considered when presenting conclusions on the overall value of the landscape.

16. What may be defined as reaching the 'Valued Landscape' criteria in one part of the Country may be considered to be an 'everyday landscape' in another.
17. A 'Valued Landscape' should demonstrate the presence of a number of indicators of landscape value, although it is possible for one indicator to be of such importance that the landscape is judged to be a 'valued landscape' even if other indicators are not present.
18. The identification of landscape value needs to be applied proportionately ensuring that identification of 'Valued Landscape' is not over-used.

## Review of South Oxfordshire Landscape Character Assessments 2003 and 2017

7.5. Important aspects of these assessments are:

1. SOLCA'17 and '03 identify two LCA within the Parish: 'LCA 10 Chilterns Plateau with Valleys' and 'LCA 11 Thames Valley and Fringes'
2. SOLCA'17 and '03 identify 5 LCT within the Parish: 'Open dipslope', 'Semi-enclosed dipslope', 'Wooded dipslope', 'Flat floodplain pasture', 'Floodplain wetland'.
3. SOLCA'03 judged the The quality and condition for each of these to be:

'Open dipslope',	<b>Repair</b>
'Semi-enclosed dipslope',	<b>Conserve</b>
'Wooded dipslope',	<b>Conserve</b>
'Flat floodplain pasture',	<b>Conserve</b>
'Floodplain wet'.	<b>Restore</b>
4. At the time of the assessment the 'Open dipslopes' were judged to be 'not 'special' or distinctive to quite the same degree as those in the above (conserve) category'.
5. The PLCA does not differentiate between the relative condition / values of the different LCT nor does it agree with the SOLCA'03 judgement that the 'Open dipslopes' were judged to be 'not 'special' or distinctive to quite the same degree as the other LCTs.
6. SOLCA'17 made no assessment of the general quality or condition of landscape within the LCT.

## Summary of the Eye & Dunsden Parish Landscape Character Assessment

7.6. Important aspects of the PLCA are:

1. The PLCA has not followed guidance in ALCA'14 or GDLLA'20. It combines LCAss descriptions with judgements regarding value. I do not consider the distinction between these two separate aspects is clearly set out in the PLCA.
2. The PLCA has not followed guidance in GDLLA'20. No ranking is given nor is the relative value of each landscape unit presented in a systematic, criteria-based manner, and given values such as 'high', 'medium' or 'low'
3. The PLCA has not followed guidance from GDLLA'20. Rather than carry out a more detailed LCAss, the PLCA combines LCA into larger parcels for assessment, and concludes by assessing the whole Parish as one landscape unit.
4. It is the factors in TGN'21, Table 1 that should be considered when assessing landscape value to ensure the assessment follows the most up-to-date guidance. This has not been used in the PLCA.
5. The PLCA does NOT include a methodology or reference to a methodology. It does NOT provide a clear

and transparent evidence base.

6. the PLCA is wrong to state that GLVIA3 paras 5.26 to 5.31 identify criteria for 'Valued Landscapes' in the terms of NPPF. The PLCA does NOT follow the latest guidance on assessing landscape value from TGN'21.
7. The broad description of landscape setting includes some errors and emphasis that could inflate the value of the landscape in later sections. It fails to point out that the high point is part of an east west ridge, creating two distinctively different areas of slope/aspect/view within the Parish, as shown on figure 5 of the PLCA and figure 20 of the EDNP.
8. The PLCA does not differentiate between the relative condition / values of the different LCT nor does it agree with the SOLCA'03 judgement that the 'Open dipslopes' were judged to be 'not 'special' or distinctive to quite the same degree as the other LCTs.
9. There are a number of inconsistencies between the PLCA description of landscape character context and the SOLCA'17 description of landscape character context.
10. The PCA does NOT provide an objective comparison of all special qualities of the AONB and the degree to which the Parish landscape shares those qualities.
11. The PLCA is incorrect to state that there is a high level of 'interconnectivity between the edge of the Chilterns AONB and the Parish'.
12. The PLCA is incorrect to suggest that the Parish (as a whole, or most of) is visible from the AONB.
13. The PLCA is incorrect to state that most of the Parish falls within the setting of the AONB.
14. I consider that the PLCA overplays the degree to which the AONB affects the value of landscape within the Parish.
15. The PLCA provides no clear methodology to explain how the 4 LCA and their boundaries have been defined.
16. I do NOT consider that the Parish Landscape Character Areas are appropriate. There should be at least 6 PLCA rather than the 4 assessed.
17. I consider that the PLCA wrongly identifies a number of key views.
18. I consider that the PLCA wrongly identifies a number of landmarks.
19. The factors used to justify why the landscape is above ordinary are NOT taken from current guidance.
20. The PLCA fails to include an assessment of negative factors.
21. The PLCA fails to make judgements of relative value so it is NOT possible to see how each LLCA is elevated above 'ordinary countryside.'
22. The PLCA should NOT include local landscape designations as a factor in determining landscape value.
23. The PLCA should NOT assume that factors of individual value necessarily lead to an area being judged to be Valued Landscape.
24. The PLCA does NOT judge the overall 'weight of evidence' in coming to an overall judgement on landscape value for any landscape unit
25. The conclusion of the PLCA that ALL land within the Parish should be 'Valued Landscape' is NOT an accurate or robust conclusion. It has NOT been applied proportionately, and it demonstrates that the identification of 'Valued Landscape' has been overused, contrary to the guidance given in TGN'21. It is NOT based on any clear, transparent methodology, it does not follow current guidance and it fails to recognise what does and what does not constitute 'Valued Landscape' in terms of TGN'21 and the NPPF.

## Alternative Assessment of value for each of the Local Character Areas

7.7. My own assessment of value for landscape parcels within the Parish identifies and values the following parcels:

- |  |  |
|--|--|
| • LLCA1: River Thames and Meadows                | <b>High Value – ‘Valued Landscape’</b>             |
| • LLCA2: River Thames, Meadows and Lakes         | <b>High Value – ‘Valued Landscape’</b>             |
| • LLCA3A: Dunsden Open Dipslopes south           | <b>Medium value</b> (not out of the ordinary)      |
| • LLCA3B: Dunsden Open Dipslopes north           | <b>Medium value</b> (not out of the ordinary)      |
| • LLCA4A: Dunsden Semi-enclosed dip-slopes south | <b>Medium-high value</b> (not out of the ordinary) |
| • LLCA4B: Dunsden Semi-enclosed dip-slopes north | <b>Medium-low value</b> (not out of the ordinary). |

## Conclusion

7.8. The PLCA does NOT provide a robust, accurate evidence base for the identification of landscapes within the Parish that meet the criteria of ‘Valued Landscape’ in terms of para 187 of the NPPF.

7.9. Of the landscapes within the Parish, only the Local Landscape Character Types LLCA 1: River Thames and Meadows; and LLCA2: River Thames, Meadows and Lakes should be considered to meet the criteria of ‘Valued Landscape’ in terms of para 187 of the NPPF.



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To Whom It May Concern

## EYE AND DUNSDEN NEIGHBOURHOOD DEVELOPMENT PLAN REGULATION 16 CONSULTATION

### 1. Introduction

These representations are being made on behalf of Mr and Mrs Hiscox. Mr and Mrs Hiscox are objecting to the designation of their paddock (site SE2) as a Local Green Space (LGS) in the Eye and Dunsden Neighbourhood Plan.

### 2. Legal Requirements

Before a Neighbourhood Plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 46 of the Town & Country Planning Act 1990. The basic conditions include that the Eye and Dunsden Neighbourhood Plan must have regard to national policies and advice contained in guidance issued by the Secretary of State.

### 3. Local Green Spaces

The Eye and Dunsden Neighbourhood Plan acknowledges that the NPPF sets out these specific criteria which must be met before a potentially identified site can be designated as a Local Green Space. It was noted that whilst many open spaces are considered important to residents this is not sufficient for being designated and the NPPF tests needed to be applied and there may be sufficient protection by other designations. During earlier consultations some proposed sites have now been removed but despite previous representations made by the landowner, the SE2 site remains as a proposed designated LGS

### 4. Site SE2

This is a small triangular shaped island of land that was formed following an improvement to the local road network circa 1992 when the previous landowner gifted the land to Oxford Country Council to construct a new road and roundabout. The site is bounded by public roads on all sides including the Playhatch Road B478 to the north which is a busy road leading to the Sonning Bridge Thames Crossing.



Prior to 1992 site SE2 formed part of a larger agricultural field which provided an important grazing area for the “new” dairy at Frizers Farm. When the new road severed this site from the farm, its agricultural value was reduced. It was then used for horse grazing. The site was purchased by the current landowner in December 2019 and has been used as amenity paddock land and the growing of apples trees.

They have undertaken works to improve the trees and hedgerows.

#### 5. Local Green Space Assessment - Evidence based document V2.4 July 2025.

The Neighbourhood Plan Steering Group instructed Bluestone Planning LLP to undertake an evidence based assessment to assess potential sites to see if they would qualify for designation as an LGS in accordance with the NPPF.

##### 5.1 Paragraph 107 NPPF states that

“The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land”.

##### 5.2 Bluestone Planning LLP have applied what they say is an established matrix methodology and applied a scoring system. A copy of the scoring system is attached in Appendix A.



The scoring of SE2 is as follows:

Eye and Dunsden Neighbourhood Plan Local Green Spaces Assessment

Name of site (as popularly known)	NPPF 1 - Close proximity to community (yes/no)	NPPF 2 - Demonstrably special to a local community				NPPF 3 - Extensive Tract of land?	Ownership Owner aware?	Is this site allocated for any other use (yes/no)?	Public access	Score	%	Recommendation	Comments on Reason for Designation or Not (particularly where sites may be borderline)
		Beauty/ Amenity value (yes/no)	Recreation (yes/no)	Historical (yes/no)	Tranquillity (yes/no)								
SE-2 The triangle of land forming the junction of the B478 between The Saltery and The Eyit House	Y 1	4	0	2	3	2	N 1	Y -	N 1	14	51%	DESIGNATE	Highlighted as being an important open space in the Conservation Area. Recent planning application for barn refused - makes a positive contribution to the setting of the Conservation Area and landscape setting of the village. Residents perceive this space as integral to village identity.

The assessment provides a summary of the NPPF criteria and then concludes “the land scored 51% in the matrix, which is considerably above the threshold of 50% and therefore is proposed to be designated as an LGS due to its considerable benefit to the community.

We disagree with their conclusion that the 51% score is “considerably above the threshold of 50%” and that the criteria they have assessed has been over-scored.

5.3 We do accept that SE2 does satisfy part of the NPPF criteria at paragraph 107:

- (a) In reasonably close proximity to the community to serves.
- (b) Local in character and is not an extensive tract of land.

5.4 We do not accept that SE2 satisfies the criteria below:

- (a) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.

5.5 We have reviewed the scoring matrix applied to SE2 and comment as follows:

Close proximity to community - Agreed.

Beauty / Amenity

The NP Assessment have given it a score of 4 out of 5.

We consider that it should only receive a score of 2. It is a small area of grassland, and as described in the assessment has a mature boundary, trees and hedgerows. We consider that this is only a limited number of natural features.

Historical

We agree with the scoring of 2.

Tranquillity

The assessment has given this land a score of 3 out of 5. We consider that it should only receive a score of 2. The site is completely surrounded by roads on all sides including what the Neighbourhood Plan describes as the “busy B478 road”. There are frequent queues of traffic



arising from the traffic lights at the Sonning Bridge. It is impossible for this site to demonstrably provide tranquillity to the local community as there is no public access.

Wildlife

The assessment has given the land a score of 2 out of 3. To achieve this score there is a requirement that good evidence has been submitted in relation to wildlife on the site. There are a number of ecological reports in the NP appendices but none of these provide any submitted evidence in relation to SE2. We therefore consider this should only receive a score of 1.

5.6 Total Score

Taking into account our assessment above we give a score of 10 which is 37% compared to the NP Assessment of the score of 14 which is 51%.

The scoring assessment score states that at 50%+ a further assessment should be carried out. At less than 40% the site would be substantially below threshold and no further assessment required and no designation.

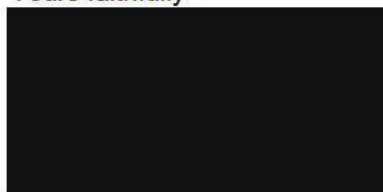
6. Conclusion

We comment on the Eye and Dunsden Neighbourhood Plan submission draft. This representation has been drafted with reference to the revised National Planning Policy Framework.

It is very clear to us that based on the Neighbourhood Plan Local Green Space assessment scoring matrix that site SE2 does not satisfy the NPPF criteria for designation as a Local Green Space.

We request that as part of the Neighbourhood Plan Examination process, this site is removed from the proposed LGS designation.

Yours faithfully



Rural Surveyor, Director

Appendix A – Bluestone Planning Scoring Matrix Extract

Score	Criteria	Description
5	BEAUTY	Excellent visual attractiveness, excellent variety of natural features and of good quality, provides an excellent contribution to the setting of the local area
4	BEAUTY	Very good visual attractiveness, good variety of natural features and of good quality, provides a very good contribution to the setting of the local area
3	BEAUTY	Good visual attractiveness, variety of natural features and of good quality, provides a good contribution to the setting of the local area
2	BEAUTY	Limited visual attractiveness, limited variety of natural features and of good quality, provides a limited contribution to the setting of the local area
1	BEAUTY	Very poor visual attractiveness, very limited variety of natural features and of good quality, provides a very limited contribution to the setting of the local area
0	BEAUTY	No visual attractiveness, no variety of natural features and of good quality, provides no contribution to the setting of the local area
5	RECREATION	Public access, evidence of a good range of informal and formal uses, excellent facilities (good/ excellent conditions and range) and information on/ evidence of frequent use.
4	RECREATION	Public access, evidence of good range of informal uses, good facilities for condition and range and/or information on/ evidence of frequent use.
3	RECREATION	Public access, evidence of good range of informal uses, some informal facilities and/or information provided on/ evidence of frequent use.
2	RECREATION	Public access but no evidence submitted of informal or formal use. No suitable recreation facilities, and no information provided/ evidence of frequent use.
1	RECREATION	Site is accessible to the public, but no evidence submitted of informal or formal use. No suitable recreation facilities, and no information provided/ evidence of frequent use.
0	RECREATION	Site has no public access and is therefore considered to have no/ very limited recreational value.
Additional weight to be added if no other spaces are within 800m (10 mins) of the space being assessed to ensure that spaces which are more isolated but provide recreational value are recognised for their importance.		
5	TRANQUILITY	No visible sources of disturbance. No visual or audible intrusion. High degree of self-containment and screening. Limited self-containment and screening. Scale of site may mean there are unshielded parts.
4	TRANQUILITY	Some disturbance. The site is located on a major and/or minor road with some neighbouring uses causing disturbance. Limited self-containment and screening. Scale of site may mean there are unshielded parts.
3	TRANQUILITY	Frequent disturbance. The site has some disturbance by a main and/or multiple roads and/or by neighbouring uses with regular disturbance. Limited self-containment and screening.
2	TRANQUILITY	Major and constant disturbance. This site is heavily affected by a main road/ or by neighbouring uses with regular disturbance. Total lack of self-containment and screening.
1	TRANQUILITY	Very high disturbance. The site is heavily affected by a main road/ or by neighbouring uses with regular disturbance. Total lack of self-containment and screening.
0	TRANQUILITY	Very high disturbance. The site is heavily affected by a main road/ or by neighbouring uses with regular disturbance. Total lack of self-containment and screening.
5	HISTORY	The site meets all of the sub-criteria
4	HISTORY	The site meets four of the sub-criteria
3	HISTORY	The site meets three of the sub-criteria
2	HISTORY	The site meets two of the sub-criteria
1	HISTORY	The site meets one of the sub-criteria
0	HISTORY	The site meets none of the sub-criteria
Sub-criteria Site is located within an area of high archaeological potential Site makes a positive contribution to the setting of a locally listed building Site makes a positive contribution to the setting of a nationally listed building Site makes a positive contribution to the setting of a scheduled ancient monument Site makes a positive contribution to the setting of a conservation area Site of local historical importance		
3	WILDLIFE	Good level of evidence submitted in relation to wildlife on site, and open space is located in close proximity to, or is designated as, an area of local ecological importance or local Nature Reserve.
2	WILDLIFE	Good evidence submitted in relation to wildlife observed on site but open space is not in or close proximity to any designated area of ecological significance.
1	WILDLIFE	None or limited evidence submitted in relation to wildlife observed on the site, and the open space is not in, or in close proximity to any designated area of ecological significance. There is however an assumed level of wildlife value to the site (heath or peat).
70%+	SCORE	Designate
60%+	SCORE	Designate unless any preventative reason
50%+	SCORE	Above threshold - complete further assessment
40%+	SCORE	Below threshold - no further assessment required - no designation
-40%	SCORE	Substantially below threshold - no further assessment required - no designation

The scoring system is the number of accumulated points in the NPPF 2 section, plus 1 point for each relevant yes/ no questions in NPPF1 and NPPF3, plus whether it is allocated for any other use and whether it has public access. The only question that does not receive points is whether the owner is aware. Therefore a site can gain an additional 4 points further to the scoring given in the NPPF2 questions.

In designating an area as Local Green Space it is proposed that if an area achieves over 50% of the points available, then it would be considered for designation. This is because it would need to score highly against at least three criteria. Alternatively, if an area scores maximum points (5) against two criteria, but does not score at least 13 points overall, it will also be considered for designation due to scoring so highly against those criteria if an area scores below 13 points and does not score 5 against two criteria then it will not be considered for designation as the area is not considered to be meeting the requirements of the criteria sufficiently to warrant designation.

# Response 16



23<sup>rd</sup> January 2026

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Dear Sirs

## **RE: Eye and Dunsden Neighbourhood Plan Regulation 16 Consultation**

These Neighbourhood Plan Representations have been prepared by Savills (UK) Ltd, on behalf of our client, Coppid Farming Enterprises LLP (The Estate) referred to in the Neighbourhood Plan as land and property owned by the Phillimore Estate.

We estimate that The Estate are one of the majority land owners of the land within the Neighbourhood Plan area and estimate they own circa 70%.

### **Policy ED-BG14 - Local Green Spaces and Appendix IV**

Policy BG14 seeks to allocate areas of the Parish as Local Green Space (LGS). When designating Local Green Spaces, regard must be had to Paragraph 107 of the NPPF which states the following:

“107. The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.”

The use of the wording ‘should only’ makes clear the LGS designation should not be used extensively.

The Neighbourhood Plan Steering Group instructed Bluestone Planning LLP to undertake an evidence based assessment to assess the potential sites to see if they would qualify for designation as an LGS in accordance with the NPPF. Bluestone Planning LLP have applied what they say is an established matrix methodology and applied a scoring system.

Our comments on the Local Green Space designations owned by the Coppid Farming Estate are as follows:

#### **1. Local Green Space – DG3 The fields below Dunsden Village Hall**

Further to our representation in January 2024, we had put forward our objections that the land directly behind Ivy Cottages should be removed from the designation of a Local Green Space. The reason behind this is that

in isolation, the removed section of land would score 0 for recreation, 0 for historic and would not be demonstrably special to the local community.

We can see a comment has been made in the revised Local Green Space Assessment that 'only the land outside of the adjacent Ivy Cottage site should be included'.

## Conclusion

We therefore conclude that the plan for DG3 should be amended as per the plan below and make it clear that the land directly behind Ivy Cottages is not included in the designation of the Local Green Space.

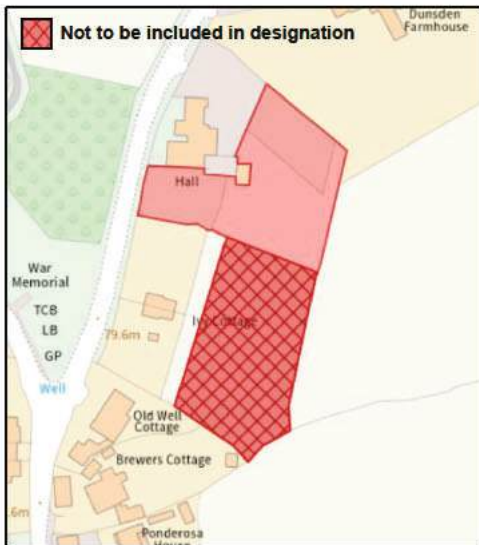


Figure 1 showing DG-3 Local Green Space designation

## 2. Local Green Space DG4 – Land between Orchard Cottage and Dunsden green Farmhouse

With regards to DG4 we do agree that it is in accordance with the NPPF LGS designation with regards to being reasonably close to the community it serves.

However we disagree it in accordance with points b and c stated above.

DG4 is part of a large arable field, which previously included site DG2 which was transferred by the Estate to the Parish Council to enable them to create a community orchard.

We consider that the site has been over scored. In particular the fact that there is a public path along the northern boundary, this does not constitute public access to the site .

We have provided an alternative score as follows:

	NP / Bluestone	Savills
Beauty	3	2
Recreation	2	0
Historical	1	1
Tranquillity	3	3
Wildlife	1	1

The Bluestone score of 51% suggests that further assessment is required and there should be no designation. The Savills score of 40% indicates that the site is below threshold and no site designation.

### **Conclusion**

We propose this site is not designated as local green space. It conflicts with the NPPF as is a large tract of land with no evidence to suggest it has local significance to the community and by the Neighbourhood Plans Assessment cannot be designated without further assessment.

### **3. Local Green Space DG6 – Land at the junction of Dunsden Green Farm/ Loddon Brewery**

With regards to DG6 we do agree that it is in accordance with the NPPF LGS designation with regards to being reasonable close to the community it serves. However we again disagree it in accordance with points b and c.

There has been no evidence provided to suggest the site has good ecological importance with richness of wildlife as the NP suggests. We would however support the inclusion of this as a LGS if the woodland area used as informal car parking for a local business is removed.

### **Conclusion**

This site is either to be disregarded or amended as per the plan below.



Figure 2 showing DG-6 Local Green Space designation

### **4. Local Green Space SE7 – Poplar Wood**

This site should not be designated as a Local Green Space as conflicts with the NPPF. It is not in reasonably close proximity to the community it serves, it is an extensive tract of land and is largely private woodland with no public access save for the Thames Path at the south of the proposed site.

By the Neighbourhood steering groups own matrix, the site should be disregarded as states that a score of 40%-49% is below threshold – no further assessment required – no designation. The score for SE7 is 48%.

### **Conclusion**

The site is to be disregarded as a potential Local Green Space as conflicts with the NPPF and with the NP Steering Groups matrix.

**5. Local Green Space PH-3 Land surrounding the spring adjacent to the junction with A4155 and Spring Lane.**

This site should not be designated as a Local Green Space as conflicts with the NPPF. It is not in reasonably close proximity to the community it serves, it has no public access and we see no further evidence that it is demonstrably special to the community.

By the Neighbourhood steering groups own matrix, the site should be disregarded as states that a score of 40%-49% *is below threshold – no further assessment required – no designation*. The score for PH3 is 48%. We also disagree that the site should score a 1 for recreation when there is no public access and therefore should score a 0. In addition, no evidence has been submitted in relation to wildlife. The correct score for this site would then be 40% and should not be designated.

**Conclusion**

The site is to be disregarded as a potential Local Green Space as conflicts with the NPPF and with the matrix commissioned by the steering committee as scores below 50%.

In summary, we request that Local Green Spaces DG-4, SE-7 and PH-3 are deleted as a LGS and DG-3 and DG – 6 are either amended as shown above or removed. As explained above, there is significant concern that these Local Green Spaces do not meet the requirements of Paragraph 10 of the NPPF nor on several occasions the NP Steering groups own matrix. We cannot understand why the NP steering group are consistently ignoring the results of their own matrix scoring.

Yours sincerely



  
Director

# Response 17

Policy and Programmes

**HEAD OF SERVICE: TIM ORUYE**



Listening Learning Leading

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27 January 2026

**Eye and Dunsden Neighbourhood Development Plan – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)**

South Oxfordshire District Council has worked to support Eye and Dunsden Parish Council in the preparation of their neighbourhood plan and compliments them on a very 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 emerging Eye and Dunsden Neighbourhood Development Plan (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to 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.

[REDACTED]  
**Planning Policy Officer (Neighbourhood)**

Please note that new text is shown in **bold** and deleted text as ~~**bold and struck through**~~.

#	Section	Comment/Recommendation
1	General Comment	The NPPF was last revised on 12 December 2024. Annex 1 of the NPPF 2024 sets out that the policies in this Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025. As the Eye and Dunsden Neighbourhood Plan was submitted after the 12 March 2025 (October 2025), we recommend that the references within the Neighbourhood Plan and the appendices should be updated, if appropriate, to reflect the updated NPPF 2024.
2	General Comment	We note that the page numbers in the table of contents do not align with the numbers found throughout the document. We recommend that the table of contents is updated to ensure that it accurately reflects the page numbers within the rest of the Plan and brings the clarity required by the NPPF.
3	General Comment	We recommend updating references to Areas of Natural Outstanding Beauty (AONBs) to 'National Landscapes' throughout this document, in line with national guidance.
4	4.1 Detailed Objectives – Page 19	<p>A Neighbourhood Plan needs to meet the requirements of <a href="#">Section 38B of the Planning and Compulsory Purchase Act 2004</a>, which include the requirement that a neighbourhood development plan: 'may not include provision about development that is excluded development.'</p> <p>Excluded development includes any development that consists of a county matter, including: 'the winning and working of minerals in, on or under land' and 'the carrying out of operations in, on, over or under land, or a use of land, where the land is or forms part of a site used or formerly used for the winning and working of minerals and where the operations or use would conflict with or prejudice compliance with a restoration condition or an aftercare condition.'</p> <p><a href="#">(paragraph 1(1)(a) to (h) of Schedule 1 of the Town and Country Planning Act 1990)</a></p> <p>The draft Neighbourhood Plan does acknowledge that it cannot deal with matters relating to excluded development, and modifications have been made to the Plan post-Regulation 14 to address some cases where excluded development was addressed; however, there are still a number of occurrences where the Plan strays into addressing excluded development. We have recommended that these occurrences are modified or deleted accordingly.</p>

#	Section	Comment/Recommendation
		<p>Subsection d of the objective on the Environment, Flooding &amp; Sustainability makes reference to “all new development including material extraction/restoration schemes...”</p> <p>This reference to material extraction and restorations schemes should be removed as this is a county matter and falls under excluded development. We therefore recommend the following modification to the wording:</p> <p><i>“Ensure all new development <b>including material extraction/restoration schemes, where appropriate, maximises the enhancement of the capacity of the flood plain in the parish</b>”</i></p> <p>Likewise, subsection d of the objective on Landscape Character states: “Ensure mineral extraction restoration schemes provide for new public realm and that the terms of historic restoration agreements are honoured.”</p> <p>As with the above, this addresses a matter relating to excluded development and this subsection should be deleted:</p> <p><i>“<del>Ensure mineral extraction restoration schemes provide for new public realm and that the terms of historic restoration agreements are honoured</del>”</i></p>
5	Paragraphs 5.2.1 and 5.2.2	<p>The Chiltern boundary review has been cancelled due to lack of funding. We recommend that references to this within this paragraph are deleted to ensure the Plan is accurate and that it brings the clarity required by the NPPF.</p> <p>Parts of the parish are included in the candidate Chilterns Dipslope Local Landscape Designation and the Henley-on-Thames to Sonning Eye Thames Floodplain Local Landscape Designation, as identified in the 2024 South Oxfordshire and Vale of White Horse Local Landscape Designation Review, which is part of the JLP evidence base. We recommend that reference is made to these.</p> <p>We recommend the following wording for the new paragraph 5.2.1 and 5.2.2 based on the above recommendations:</p> <p><i>“5.5.1 A small part of the north-western Parish falls within the Chilterns <b>National Landscape Area of Outstanding Natural Beauty (AONB)</b>, to the north of Bishopsland Farm. <b>It is also worthy of note that the Parish is actively being considered for an extension to the AONB. At the time of writing, consultants have been commissioned by Natural England to review the boundary of the Chilterns Area of Outstanding Natural Beauty (AONB), as part of Natural</b></i></p>

#	Section	Comment/Recommendation
		<p><del><b>England's Landscape Designation Programme. and, Eye &amp; Dunsden Parish Council are part of the Joint Parishes AONB Group (JPAG) who are a collaborative working group of neighbouring parishes making and supporting the case for an extension to the southern boundary of the AONB that would include the whole of the parish of Eye &amp; Dunsden.</b></del> Although the remainder of the Parish is currently afforded no formal landscape designation, parts of the parish are included in the candidate Chilterns Dipslope Local Landscape Designation and the Henley-on-Thames to Sonning Eye Thames Floodplain Local Landscape Designation, as identified in the 2024 South Oxfordshire and Vale of White Horse Local Landscape Designation Review.</p> <p>5.2.2 Historically <del>however in</del> previous iterations of the Local Plan (South Oxfordshire District Council Rural Areas Local Plan, Adopted July 1992), the area outside the AONB (apart from the area around the lakes in the south-west) was afforded an Area of Great Landscape Value designation. The Council at the time sought to "...conserve and enhance the quality of the landscape and to protect it from development which is likely to have an adverse effect on its character and appearance." This also included "control in relation to the design and siting of buildings and the use of land generally."</p>
6	Paragraph 5.2.7	<p>This paragraph references the South Oxfordshire Landscape Character Assessment 2017. This should be updated to refer to the latest landscape character assessment which is the South Oxfordshire and Vale of White Horse Landscape Character Assessment 2024:</p> <p><i>"This report builds on published landscape character studies most notably the <del>South Oxfordshire Landscape Character Assessment 2017</del> South Oxfordshire and Vale of White Horse Landscape Character Assessment 2024 (in support of the <del>South Oxfordshire Local Plan 2034</del> Joint Local Plan 2041), the Oxfordshire Historic Landscape Character Assessment 2017, and data sources from South Oxfordshire District Council (SODC)."</i></p>
7	5.3 Key Views and Vistas – Pages 32 – 34	<p>The view arrows for important views PLCA3a 2 and 3 appear to extend over land outside of the designated neighbourhood area boundary. Additionally, the origin point for important view PLCA2 2 also appears to fall outside of the boundary.</p> <p>As Neighbourhood Plan policies can only apply within the designated neighbourhood area, development proposals outside the neighbourhood area will not be subject to the policies contained within the Plan. As such, these views which look outside or begin outside the neighbourhood area</p>

#	Section	Comment/Recommendation
		<p>boundary should either be modified so that they are contained within the neighbourhood area or deleted.</p> <p>We also recommend that the views are renamed to provide each with a unique identifier reflective of the Landscape Character Area they are related to, for example:</p> <ul style="list-style-type: none"> <li>• <b>PLCA1 – 1</b></li> <li>• <b>PLCA1 – 2</b></li> <li>• <b>PLCA1 – 3</b></li> <li>• ...</li> <li>• <b>PLCA4 – 4</b></li> <li>• <b>PLCA4 – 5</b></li> </ul> <p>This will ensure the policy is clear and unambiguous and drafted with sufficient clarity that a decision maker can apply them consistently and with confidence as required by the NPPF.</p>
8	ED-VL2 Important Views – Page 34	<p>Important view 7 for Sonning Common includes a direct reference back to Appendix I and Figure 21. It is not clear why this has been included. View 7 on Figure 21 is simply titled “Across to Mill Island” We recommend the following modification to ensure the Plan brings the clarity required by the NPPF:</p> <p><b><del>“7. These views within Sonning Eye as set out in the SCADC (Appendix I) and highlighted in figure 21 across Across to Mill Island.”</del></b></p> <p>The penultimate paragraph of the policy appears to both duplicate and conflict with the opening paragraph. Both paragraphs deal with how development proposals should respond to the identified important views; however, the opening paragraph states that the views should be preserved whilst the penultimate paragraph states that development that has a significant adverse impact will not be supported.</p> <p>We recommend that this paragraph is reframed to express that development proposals which have an ‘unacceptable’ impact on the important views will not be supported. This reflects advice provided by the <a href="#">Examiner for the Tiddington with Albury Neighbourhood Plan</a>.</p> <p>Our recommended rewording of this penultimate paragraph is as follows:</p>

#	Section	Comment/Recommendation
		<p><i>“Development proposals which would have an <b>unacceptable significant adverse</b> impact on an identified view will not be supported.”</i></p> <p>This final paragraph is better suited as supporting text as it provides context for the policy rather than specific policy direction/guidance. We recommend that this paragraph is moved to the supporting text to ensure that the policy is clear, unambiguous, and easy to implement.</p>
9	ED-VL3 Former Mineral Extraction Areas – Page 37	<p>Whilst we note that the parish council have addressed a number of our concerns relating to this policy, we recommend a modification to the final paragraph to ensure that it is clear that the Plan is not attempting to influence material extraction/restoration schemes which are county matters and fall under excluded development so cannot be covered by policy in a neighbourhood plan. Our recommended modification intends to ensure it is clear and explicit that this policy is only intending to influence development on the sites following the completion of material extraction and restoration activities:</p> <p><i>“Where practical and appropriate, any future development proposals on the site concerned following the restoration and agreed aftercare period should maximise the current floodplain capacity by allowing free drainage from one area to another and, <del>in the future, and maintaining</del> retain any former mineral extraction sites <del>excavation remaining as open water</del>”</i></p>
10	ED-BGI2 Trees and Hedgerows	<p>Our landscape team recommends against including coniferous trees within this policy as it is unusual to include conifer tree species in native planting mixes, with native evergreen species more common.</p>
11	ED-BGI3 Use of the Lakes	<p>It appears that there is a missing link in the fourth subsection of the first paragraph. We recommend that the appropriate link is provided, or, if this does not exist, this reference is modified as following for clarity:</p> <p><i>“provides appropriate general landscaping and/or screening, <del>in accordance with xx (list of appropriate planting)</del>”</i></p> <p>We recommend that the final bullet point is modified for clarity:</p> <p><i>“not have an unacceptable negative noise impact on neighbouring residents and properties.”</i></p>
12	ED-BGI4 Local Green Spaces	<p>We have concerns that the proposed Local Green Space PH3 appears to fall within the Sonning Quarry (Caversham Phase C) Mineral Extraction Area (Latest application:</p>

#	Section	Comment/Recommendation
		<p>P25/S0482/CM). Oxfordshire County Council (OCC) have confirmed that this land is required to support the restoration and long-term management of the former mineral extraction and is awaiting the completion of agreed aftercare. This is likely to have implications on the ability of the proposed LGS to endure beyond the end of the plan period. On this basis, we recommend that this proposed Local Green Space is removed.</p>
13	Policy ED-FR1 Flooding and Drainage	<p>The first, second and fourth paragraphs in this policy would be more suited the supporting text as they deal more with the evidence base for the policy instead of providing policy direction/guidance. We recommend that these are removed from the policy and repositioned into the supporting text above. We recommend that a clearer link is provided in the policy text to link to the areas identified as being particularly vulnerable to flooding.</p> <p>We recommend a modification to the first half of the third paragraph to more clearly set out what the requirements for development proposals are, and to better integrate the fifth, sixth, seventh, and ninth paragraphs of the policy.</p> <p>We note that paragraph six requires adherence to LLFA Standards. Oxfordshire County Council sets out that the LLFA Standards are intended to be guidance and are therefore a material consideration to be taken into account when determining an application. It is not appropriate for the Neighbourhood Plan to require adherence to a guidance document. We therefore recommend a modification setting out that proposals should have regard to this document, rather than to adhere to it.</p> <p>We recommend the inclusion of a clear requirement that development proposals must accord with Policy EP4 of South Oxfordshire District Council's Local Plan in relation to the management of surface water and flood risk. This will ensure that this policy acknowledges the specific requirements set out in this policy and ensures that developments occurring within Eye and Dunsden comply with it.</p> <p>We also recommend more clearly setting out that proposals should incorporate sustainable urban drainage systems (SuDS) as the preferred approach to surface water management and demonstrate that the drainage strategy has been prepared in accordance with the national drainage hierarchy. We also recommend setting out that development proposals should have regard to a number of key documents related to the design of surface water drainage to ensure that</p>

#	Section	Comment/Recommendation
		<p>the policy can be implemented effectively and to ensure that the plan brings the clarity required by the NPPF.</p> <p>The second half of the third paragraph sets out when a detailed flood risk assessment should be provided. The conditions provided are less detailed than those set out in Policy EP4 of the South Oxfordshire Local Plan 2035. It is unclear why fewer conditions have been provided regarding flood risk assessments within the Neighbourhood Plan than within the Local Plan 2035. We recommend a modification to this element of the policy to ensure that the Plan is consistent with the guidance.</p> <p>We recommend that the eighth paragraph should be restructured to ensure it is clear and unambiguous, as required by the NPPF, and to positively reframe this section.</p> <p>As a result of the above recommendations, we recommend that the policy is modified as follows:</p> <p><b><i>“As appropriate to their scale, nature and location, development proposals will be supported where they:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>it is demonstrated that surface water drainage will not add to the existing site runoff or cause any adverse impact to neighbouring properties and surrounding environment, especially those areas identified as being particularly vulnerable to flooding.</i></b></li> <li>• <b><i>demonstrate that flood risk is not increased on-site or elsewhere, and where appropriate measures are incorporated to reduce overall flood risk.</i></b></li> <li>• <b><i>are accompanied by This should be demonstrated through a detailed Flood Risk Assessment (FRA) where required by Policy EP4 of the South Oxfordshire Local Plan 2035. in respect of sites that fall within Flood Zones 2 and 3, sites at risk of surface water flooding, and sites of 1 hectare or larger as shown in Figures 32 and 33.,</i></b></li> <li>• <b><i>demonstrate that surface water drainage is consistent with South Oxfordshire Local Plan Policy EP4 and the National Planning Policy Framework.</i></b></li> <li>• <b><i>demonstrate that the loss of floodplain storage capacity and extensive areas of impermeable hardstanding, unless clearly justified and appropriately mitigated, has been avoided. adverse impact on floodplain capacity should not occur, to this end impermeable hardstanding areas should be avoided.,</i></b></li> </ul>

#	Section	Comment/Recommendation
		<ul style="list-style-type: none"> <li>• <del>All development applications must adhere have regard to LLFA Standards and Local Plan EP4 in order to provide adequate protection for the community and infrastructure at large,;</del></li> <li>• <del>incorporate Sustainable Drainage Systems (SuDS) should be incorporated into all major development schemes and, where feasible, minor development schemes, be designed to contribute towards landscaping and biodiversity on-site. Provision should be made for their future maintenance, where possible,;</del></li> <li>• <del>demonstrate that development has been located and designed to minimise exposure to flood risk, applying the sequential approach as set out in NPPF. in view of the significant risk within the Plan Area of fluvial and surface water flooding, the location of any development must be carefully selected, and</del></li> <li>• <del>developments will be required to incorporate appropriate flood resilience measures.”</del></li> </ul> <p><b>Development proposals must demonstrate that surface water drainage:</b></p> <ul style="list-style-type: none"> <li>• <b>Will not increase existing site runoff</b></li> <li>• <b>Will not cause adverse impacts to neighbouring properties or the wider environment</b></li> <li>• <b>Will prioritise infiltration and natural drainage solutions where ground conditions allow</b></li> </ul> <p><b>SuDS proposals should:</b></p> <ul style="list-style-type: none"> <li>• <b>Be designed having regard to the relevant Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire;</b></li> <li>• <b>Have regard to the CIRIA SuDS Manual (C753), the National Standards for Sustainable Drainage Systems, and the Non-Statutory Technical Standards for SuDS</b></li> <li>• <b>Contribute to on-site landscape character and biodiversity</b></li> <li>• <b>Include arrangements for long-term maintenance and management</b></li> </ul> <p><b>Development proposals must demonstrate that adequate capacity exists within the foul sewer network. Any schemes which can be identified which would reduce surface water run-off should be encouraged and supported; however, Where capacity is insufficient,</b></p>

#	Section	Comment/Recommendation
		<p><b><i>development will only be supported if additional capacity is provided prior to occupation. <del>proposals to surcharge the existing foul sewer network will not be supported.</del></i></b></p> <p><b><i>Where development is proposed in areas of identified flood risk, appropriate flood resilience and resistance measures must be incorporated into the building design, having regard to the Improving the Flood Performance of New Buildings guidance.</i></b></p> <p><b><i>Development proposals that can demonstrate a reduction to existing surface water runoff or contribute to wider flood risk reduction within the Neighbourhood Plan Area will be encouraged and supported.</i></b></p> <p>Relocate the following to the supporting text:</p> <p><i>“Large parts of the Plan Area are located in Flood Zones 2 and 3 (as shown in figure 32 and figure 33). The risk of fluvial flooding covers the entirety of the village of Sonning Eye.</i></p> <p><i>There is also a high risk of surface water flooding within the Plan area (as also shown in detail on figures 32 and 33). In particular there is a high risk of surface water flooding within southern Playhatch, Playhatch Road and the B478 in Sonning Eye, to the east of Dunsden Green Farm, Church Lane, Row Lane, Dunsden Green.</i></p> <p><i>The following areas have been identified as being particularly vulnerable to flooding:</i></p> <ul style="list-style-type: none"> <li>• <i>The village of Sonning Eye</i></li> <li>• <i>The areas to the south of Playhatch</i></li> <li>• <i>The B478 in Sonning Eye</i></li> <li>• <i>The areas surrounding Playhatch Road</i></li> <li>• <i>The areas to the east of Dunsden Green Farm, Church Lane, Row Lane and Dunsden Green”</i></li> </ul> <p>We also recommend that a footnote is provided as to where information on the relevant documents can be located  <a href="https://www.oxfordshirefloodtoolkit.com/planning/developers/Improving%20the%20Flood%20Performance%20of%20New%20Buildings">https://www.oxfordshirefloodtoolkit.com/planning/developers/Improving the Flood Performance of New Buildings</a>  <a href="#">National standards for sustainable drainage systems (SuDS) - GOV.UK</a>  <a href="#">The SuDS Manual C753F</a>  <a href="#">Roles and responsibilities relating to SuDS   Local Government Association</a></p>

#	Section	Comment/Recommendation
14	Paragraph 5.10.3	The Chilterns AONB Management Plan 2019-2024 has now been superseded by a new Management Plan for the Chilterns National Landscape 2025-2030. We recommend that this reference is updated.
15	Paragraph 5.10.4	<p>We recommend that references to the previous South Oxfordshire Design Guide are removed to avoid confusion and to ensure the Plan brings the clarity required by the NPPF:</p> <p><i>“The <del>South Oxfordshire Design Guide SPD (originally adopted in 2016)</del> has recently been superseded by a <del>Joint</del> Vale of White Horse and South Oxfordshire Design Guide <del>(was-adopted in June 2022)</del>. The Design Guidance website provides detailed advice on the Council's expectations for high quality development and how the design policies should be interpreted. It identifies how designs can respond and complement the existing local character and identity of the District.”</i></p>
16	ED-DH1 Design Principles & Code	<p>We recommend that the first paragraph is reworded to ensure it is not overly restrictive and unduly onerous. 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>This policy also sets out that the Design Code is located on pages 69-76 in the first paragraph, the fourth bullet point and the fifth bullet point. This appears to be an incorrect reference, and the correct pages are 71-79. We recommend that these are updated, and a link is provided through to Appendix I, to better link these documents and to ensure the plan brings the clarity required by the NPPF. We also recommend a direct reference to the Joint Design Guide in the first paragraph, to ensure it is clear that development proposals are expected to take account of this document as well as the local Design Code.</p> <p>We therefore recommend that the first paragraph of this policy is reworded so that it is more consistent with the wording found in the NPPF and to bring the clarity required by the NPPF:</p> <p><i>“Appropriate development should respect, maintain and enhance the character of the Plan Area, and support will be given to proposals which <del>comply with</del> take account of the Design Code (as set out on pages <del>69-76</del> 71-79 and within Appendix I) and the Joint Design Guide.”</i></p>

#	Section	Comment/Recommendation
		<p>Likewise, we also recommend the following modification to the fourth and fifth bullet points to ensure the policy brings the clarity required by the NPPF:</p> <p><i>“utilise locally distinctive features and materials as set out in the Character Appraisal and in the Design Code (<b>as set out on pages <del>69-76</del> 71-79 and within Appendix I).</b>”</i></p> <p><i>“include appropriate hard and soft landscaping to reduce the impact of development, incorporating locally native species where possible, as described in the Design Code ((<b>as set out on pages <del>69-76</del> 71-79 and within Appendix I).</b>”</i></p> <p>We also recommend that subsequent references to the Design Code throughout the plan should utilise this same language when referring to the use of the Design Code.</p> <p>We note also that several of the bullet points overlap with other policies within the draft NDP. We recommend the following modifications to avoid duplication and ensure that the requirements are consistent throughout the plan.</p> <p>We recommend the following modification to avoid duplication with Policy ED-VL2:</p> <p>“</p> <ul style="list-style-type: none"> <li>• <i>respond positively to the identified <b>key settlement views</b>, features and open spaces (as shown on figures 36, 37 and 39), scale, mass, density, plot ratios, landscaping and design of the immediate area and the settlement context as set out in the Design Code and in the Settlement Character Appraisal (Appendix I),”</i></li> </ul> <p>We recommend the following modification to avoid duplication with Policy ED-DH2:</p> <p>“</p> <ul style="list-style-type: none"> <li>• <i>ensure development does not dominate adjacent buildings, <b>the setting of heritage assets</b>, public spaces, and private amenity spaces, and preserves the amenity of nearby properties,”</i></li> </ul> <p>We recommend the following modification to avoid duplication with Policy ED-BGI2:</p> <p>“</p>

#	Section	Comment/Recommendation
		<p><del>• <b>retain and enhance existing natural features, such as mature trees, hedgerows, streams and watercourses,</b></del></p> <p>We recommend the following modification to avoid duplication with Policy ED-FR1:</p> <p>“</p> <ul style="list-style-type: none"> <li><del>• <b>preserve and enhance where possible the floodplain capacity through natural landscaping, reduction of non-permeable surfacing throughout the Plan Area and improved drainage features, and create accessible buildings and opportunities for a well-integrated development with accessible links to surrounding green and blue infrastructure.</b></del></li> </ul> <p>Our Tree Officer has highlighted that due to our changing climate, it is not always appropriate to plant native species. Instead, they recommend requiring appropriate species for the site’s growing conditions. Therefore, we recommend the following amendment to ensure the policy is drafted with sufficient clarity that a decision maker can apply it consistently:</p> <p>“</p> <ul style="list-style-type: none"> <li><i>include appropriate hard and soft landscaping to reduce the impact of development, incorporating <b>locally native appropriate species for the site’s growing conditions</b> where possible, as described in the Design Code (on pages 69-76),”</i></li> </ul> <p>Please see the specific Design Code comments below.</p>
17	Figure 36, 37 and 39	<p>These figures contain a number of “views” which do not appear to match the designated “Important Views” set out in Policy ED-VL2. We recommend that these views are either modified to match those shown on Figure 21 or removed to ensure consistency, and to bring the clarity required by the NPPF.</p>
18	Policy 5.12.6	<p>We recommend that references to the previous South Oxfordshire Design Guide are removed to avoid confusion and to ensure the Plan brings the clarity required by the NPPF:</p> <p><i>“There has been recent development in the settlement which has not been consistent with good design principles set out in the <b>Joint Design Guide previous version of the South Oxfordshire Design Guide.</b>”</i></p>

#	Section	Comment/Recommendation
19	Policy ED-DH2: Heritage	It does not appear that Bint's Farmhouse, which is listed in Appendix III as a Non-Designated Heritage Asset (NDHA) is shown on Figure 42. We recommend that this is added to this Figure for consistency, to avoid ambiguity, and to bring the clarity required by the NPPF. We also recommend that the list of NDHAs provided on Page 3 of Appendix III is included within the Plan alongside the three relevant figures to reduce ambiguity and increase clarity.
20	Paragraph 5.15.3	<p>We recommend that the Plan includes a reference to the emerging Joint Local Plan 2041 and the housing requirement for Eye and Dunsden (zero) which is set out in this document.</p> <p><b><i>"5.15.4. A new Joint Local Plan (JLP) is being prepared for South Oxfordshire and the Vale of White Horse which is currently at examination. The JLP identifies a zero housing requirement for settlement within the Eye and Dunsden neighbourhood area. This plan is aware of this latest available housing requirement for the plan area, which relies on and responds to the latest evidence of housing need, to ensure it is met in full."</i></b></p>
21	Policy ED-H1: Housing Development	<p>Whilst we recognise that the group have made modifications to the settlement boundaries following the Regulation 14 consultation, we still consider that in some areas the boundaries appear to have been drawn very broadly and include large areas of undeveloped land. It is important to be aware of the consequences of including/not including certain land uses and buildings within the settlement boundary you draw.</p> <p>The <a href="#">Spatial Strategy in SODC's Local Plan 2035</a> makes a clear distinction in how development is treated differently in the countryside and built-up areas of the district by ensuring that development outside of the towns and villages "relates to very specific needs such as those of the agricultural industry or enhancement of the environment." At present, we do not consider that the Neighbourhood Plan recognises these distinctions. The council would be happy to work with the parish council should the examiner consider it is necessary to refine the proposed boundaries to ensure that they contain only that land which can be considered part of the built-up area of the settlement, and exclude land which is undeveloped or whose use is more closely related to the countryside.</p> <p>As mentioned above in our comment on Policy ED-DH1, 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</p>

#	Section	Comment/Recommendation
		<p>and codes.’ We therefore recommend that the second paragraph of this policy is reworded so that it is more consistent with the wording found in the NPPF:</p> <p><i>“The individual settlements, using the SODC Local Plan to determine settlement classification, have been analysed in detail within the Parish Settlement Character Appraisal (Appendix I) and development proposals should <b>take account of <del>comply with</del></b> the Design Code for each settlement”</i></p>
22	Policy ED-CI2 Quiet Lanes	<p>We recommend that the policy is reworded to ensure the policy deals with such matters in an appropriate and proportionate manner:</p> <p><b><i>“As appropriate to their scale, nature and location, <del>D</del>development proposals should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>preserve, and where practicable, enhance the rural nature and character of the lanes as identified in Figure 50 and as set out below (insofar as they fall within the Plan Area).</i></li> <li>• <b><i>Development proposals should</i></b> include a local transport assessment and must not result in the rural quiet nature of the road links between settlements being diminished.”</li> </ul> <p>We also recommend that the relevant community aspiration and map for this policy, which is currently located on pages 98 and 99, is brought up to sit alongside this Policy.</p>
23	Policy ED-CE1 Community Facilities and Service	<p>It appears that a there is a parenthesis has been included in error in the following paragraph, we recommend that this is rectified for clarity:</p> <p><i>“Proposals for the extension, adaptation or redevelopment of community facilities (as identified in {the above table}), will be supported, only if the new facilities improve the level of provision are appropriately designed and would not unacceptably harm neighbouring amenity or otherwise adversely impact other facilities or conflict with other Plan objectives such as habitat preservation or the minimising of flood risk.”</i></p> <p>We note that there is some disparity between documents in regards to the number of identified Community Facilities. Appendix XIII lists 23 Community Facilities whilst the draft plan document itself includes just 18.</p> <p>For clarity, accuracy, and to avoid ambiguity, this apparent disparity should be resolved, and all documents should</p>

#	Section	Comment/Recommendation
		<p>contain the same identified Community Facilities. We also recommend that a map identifying the location of the community facilities is provided within the plan. This will ensure that the plan is clear and can be applied consistently.</p> <p>It would also be beneficial if these Community Facilities could be identified on a map contained with the Plan and/or Appendix XIII. This would provide additional clarity and reduce ambiguity about their location. The District Council would be happy to support the Parish Council with this.</p>
24	Policy ED-CE2 Rural Buildings and Commercial Development	<p>We recommend that the third bullet point of the policy is reworded to ensure the policy addresses these matters in an appropriate and proportionate manner:</p> <p>“</p> <ul style="list-style-type: none"> <li>• <b><i>as appropriate to their scale, nature and location, be accompanied by for all planning applications a transport statement and a should be prepared for review and approval. A traffic impact assessment will be also required for all major developments</i></b>”</li> </ul>

Settlement Character Assessment and Design Code		
#	Section	Comment/Recommendation
25	General Comment	We recommend updating references to Areas of Natural Outstanding Beauty (AONBs) to 'National Landscapes' throughout this document, in line with national guidance.
26	Page 1	Our heritage team comment that the photograph chosen for the contents photograph is perhaps not the best example to use for this document as it demonstrates bulky uPVC 'stormproof' windows which are out of character with the building and would not generally be encouraged on historic assets. We recommend that an alternative photo is used which demonstrates more appropriate and sympathetic development.
27	Figure 17	As mentioned previously (comments on Policy ED-DH2: Heritage), it does not appear that Bint's Farmhouse is shown on Figure 47 of this appendix. We recommend that this is added to this Figure for consistency, to avoid ambiguity, and to bring the clarity required by the NPPF.
28	Figure 12, 15, 18.	These figures contain a number of identified views which do not align with the key views identified on Figure 21 within the Plan. For clarity and consistency, we recommend that the views identified on these figures are either updated to reflect those shown on Figure 21, or removed.

#	Section	Comment/Recommendation
Landscape Character Assessment		
#	Section	Comment/Recommendation
29	General Comment	<p>This document appears to still be in draft form and contains a number of unfinished parts. We recommend the following modifications:</p> <ol style="list-style-type: none"> <li>1. Replace: “<del>DRAFT x 12 26th April 2022</del>” from header with “<b>Final Version: 2026</b>”</li> <li>2. Replace: “<del>DRAFT x 12: 26th April 2022</del>” on the front page with “<b>Final Version: 2026</b>”</li> <li>3. Remove: “<del>DRAFT</del>” watermark from every page</li> <li>4. Remove highlighting from text.</li> <li>5. Page 23 – “<del>Sonning Eye: Potential Local Green Spaces Ref – need to add name of doc Appendix IV: Local Green Space Assessment</del>”</li> <li>6. Page 43 – “<del>Playhatch: Potential Local Green Spaces Ref – need to add name of doc Appendix IV: Local Green Space Assessment</del>”</li> <li>7. Page 54 – “<del>Dunsden Green: Potential Local Green Spaces Ref – need to add name of doc Appendix IV: Local Green Space Assessment</del>”</li> <li>8. Page 61 – “As part of the development of the Neighbourhood Development Plan, the parish <b>has identified and designated a number of is-in-the process-of-allocating</b> important open spaces within the three settlements as Local Green Spaces. <b>This submission is presently in a draft form, but at this stage it should be recognised that each settlement has a high number of potential Local Green Spaces. More information on these can be found in Appendix IV: Local Green Space Assessment.</b>”</li> </ol>
30	General Comment	<p>This character assessment was prepared in relation to the South Oxfordshire Landscape Character Assessment 2017. This document has now been superseded by the South Oxfordshire and Vale of White Horse Landscape Character Assessment 2024.</p> <p>We recommend that the examiner invites detailed representations from both the Parish Council and District Council to provide comments on any modifications needed in order to address the differences between these two documents throughout the examination process.</p>
31	General Comment	<p>The figures in this appendix should be updated in line with the modifications recommended to the Plan above, as well as any changes which have been made to the Figures in the Plan in response to comments made during the Regulation 14 consultation.</p>

#	Section	Comment/Recommendation
32	General Comment	We recommend updating references to Areas of Natural Outstanding Beauty (AONBs) to 'National Landscapes' throughout this document, in line with national guidance.

Heritage Assets Evidence Base Document		
#	Section	Comment/Recommendation
33	Non-Designated Heritage Assets in the Parish – Page 3	As mentioned previously (comments on Policy ED-DH2: Heritage), it does not appear that Bint's Farmhouse which is shown in this Appendix is shown on Figure 42 of the Plan. We recommend that this is add to this Figure for consistency, to avoid ambiguity, and to bring the clarity required by the NPPF.

Typographical Corrections		
#	Section	Comment/Recommendation
34	General Comment	We recommend a series of typographical corrections, as set out below, to ensure the Plan brings the clarity required by the NPPF.
35	Paragraph 5.6.10	Insert a space between "corridor." and "The":  <i>"Dimensions of the corridors are given for guidance in the assessment of potential development impact on the viability of the corridor._ The policy below highlights the main features as set out above and on the adjacent plan and to deliver a biodiversity net gain."</i>
36	Policy ED-BG1	Delete letter "a":  <i>"As-a appropriate to their scale, nature and location development"</i>
37	Policy ED-BG14	Delete line break between "old" and "cartwash":  <i>"DG6 - Land at the junction of Dunsden Green Farm (the old cartwash)"</i>
38	Policy ED-DH1	Add space between "and" and "create":  <i>" preserve and enhance where possible the floodplain capacity through natural landscaping, reduction of non-permeable surfacing throughout the Plan Area and improved drainage features, and_create accessible buildings and opportunities for a well-integrated development with accessible links to surrounding green and blue infrastructure."</i>
39	Policy ED-H1 – Housing Development	Delete the extra comma: <i>"Outside of settlement boundaries, land will be treated as open countryside."</i>

# Response 18

**From:** [Cllr Leigh Rawlins](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Eye and Dunsden Neighbourhood Plan Submission (Regulation 16) Consultation  
**Date:** 27 January 2026 16:08:51

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Thank you for this.

Whilst I understand the points regarding minerals I must emphasise that the risks of flooding to Playhatch and Sonning Eye are large and come from surface water run-off, underground flows and river surges.

Any new quarries must provide extra water repository capacity such that they absorb water in storm conditions, moving water through the different detention (ex) quarries away from Sonning Eye and then pump or otherwise release such water steadily into the Thames when the storm has passed and the river level has fallen. Any new permissions will need to respect the important of human safety as regards flooding.

On a related point Berry Brook is a key waterway taking volumes of water out to the Thames. Currently the EA are very defensive about removing scrub, saplings and roots that spring up to impede its drainage and are anxious to protect habitats and fauna. That is valid so long as there is a proper rolling maintenance programme over say a 5 year period of steady quarterly works. Such an approach will enable wildlife to hop on to an adjacent area of the brook and for the vital drainage role to be maintained. It is important that human well-being is factored in in a proper way!

I would be grateful if you can reflect this balance in your observations and responses.

Thanks

Leigh

**Leigh RAWLINS**

Oxfordshire County Councillor (Liberal Democrat)

For **Sonning Common & Henley South** division

Comprising

Binfield Heath, Eye & Dunsden, Harpsden, Henley (Newtown), Shiplake and Sonning Common

# Response 19



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

**District:** South Oxfordshire  
**Consultation:**

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**Annexes to the report contain officer advice.**

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### **Overall View of Oxfordshire County Council**

Oxfordshire County Council welcomes the opportunity to comments on the Eye and Dunsden Neighbourhood Plan Regulation 16 Consultation. We have previously commented on the Regulation 14 Consultation of this plan, and where changes have not been made it can be assumed that our previous comments still stand.

**Officer's Name:**  
**Officer's Title:**  
**Date: 21 January 2026**

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**ANNEX 1**  
**OFFICER ADVICE**

**District:** South Oxfordshire District Council

**Consultation:** Eye and Dunsden Neighbourhood Plan 2011-2035

**Team:** Strategic Planning

**Officer's Title:** Strategic Planner

**Date:** 20/01/26

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The Parish of Eye and Dunsden is not expected to contribute to South Oxfordshire's housing numbers over the plan period to 2035.

It is noted that Section 2.4 of the plan, which covers the South and Vale Joint Local Plan 2041 (JLP 2041), will require updating, as at the time of writing, the Inspectors have agreed to hold a preliminary meeting to discuss the potential for hearings to restart. On this basis, it is recommended the Neighbourhood Plan makes reference to relevant policies in the JLP 2041.

### Local Green Spaces

Oxfordshire County Council would like to reiterate their concern about the allocated Local Green Spaces that fall within Highway Land as it could fetter the Council's ability to carry out their duties as the Highway Authority.

### New Thames Crossing

Oxfordshire County Council would like to reiterate the motion approved on 10th September 2019 which remains our position on a third Thames crossing:

- Should a new bridge be built, it should be restricted to public transport, cyclists and pedestrians.
- The bridge and necessary mitigation measures must not be considered as two separate projects, but as one project.

**District:** South Oxfordshire District Council

**Consultation:** Eye and Dunsden Neighbourhood Plan 2011-2035

**Team:** Place Planning and Coordination and Place Shaping

**Officer's Title:** Transport Planner

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We have reviewed the submitted Eye and Dunsden Neighbourhood Plan and supporting evidence, insofar as they relate to transport, movement, and highways matters. The Eye and Dunsden Neighbourhood Plan contains a clear ambition to improve walking and other non-motorised accessibility between settlements, reduce the impacts of traffic, and preserve and enhance public transport services.

As the Local Transport Authority and Highway Authority, the County Council is seeking consistent alignment between neighbourhood planning policy and the strategic direction set by the Local Transport and Connectivity Plan (LTCP) and its supporting Movement and Place (MAP) Plans and other supporting strategies (such as the Active Travel Strategy, Mobility Hub Strategy etc.). As part of the emerging MAP Plans being produced by the County Council, one for Henley-on-Thames and the surrounding area will be produced. In the emerging Henley-on-Thames and the surrounding area MAP Plan, the intention will be to deliver an inclusive transport system that makes streets safer and better for walking, cycling and public transport, improving access to key destinations and supporting sustainable and inclusive growth. The Henley-on-Thames and the surrounding area MAP Plan documentation will also include a series of objectives and actions ordered in accordance with the transport user hierarchy. The MAP approach places greater emphasis on place shaping alongside movement. In parallel, the Strategic Active Travel Network (SATN) is intended to connect local walking and cycling networks and enable longer distance walking and cycling across the county, moving from a straight desire line network to deliverable on the ground alignments.

The Neighbourhood Plan already provides a helpful platform for that alignment. Policy ED CI1 explicitly supports delivery of sustainable modes through secure cycle facilities, improved connectivity, and expansion of bridleways, footpaths and cycle network, and it references Local Transport Note 1/20 and OCC's Parking Standards. The Plan also recognises the current constraints and opportunities, including the lack of dedicated cycleways, the limitations of the informal path alongside Henley Road, and the importance of creating better connected routes. Policy ED CI3 supports new pedestrian and cycle routes associated with the Green and Blue Infrastructure Network, subject to maintaining or enhancing visual characteristics and biodiversity.

To strengthen the Plan's contribution to sustainable transport outcomes and to improve alignment with the emerging Henley-on-Thames and the surrounding area MAP Plan approach and the countywide SATN, the County Council recommends that the Neighbourhood Plan is amended in four principal ways.

First, the Plan should make the transport user hierarchy explicit within the transport and design policy framework, so that decision makers can see, in policy terms, that development proposals are expected to prioritise walking, wheeling, cycling and

public transport access before private car movement and parking. This would mirror the organising principle used in the emerging Henley-on-Thames and the surrounding area MAP Plan documentation and reduce the risk that the transport chapter is read primarily as a highway capacity and parking management set of tests.

Second, Policy ED C11 would benefit from a more outcome focused “mode shift” test. At present, it appropriately seeks to avoid severe highway impacts at constrained junctions and on narrow lanes, and it requires consideration of pedestrian and cycle safety and adequate cycle facilities. However, given the Plan’s own evidence on car dependency and the absence of suitable dedicated cycling provision, the policy should more clearly require that development proposals deliver material improvements to walking and cycling networks, including directness, continuity, personal safety, inclusive access, and connections to key destinations beyond the immediate development site. In practical terms, this can be achieved by requiring a proportionate transport statement to demonstrate how the proposal connects to and strengthens identified desire lines between the settlements and towards nearby service centres, public transport nodes, and existing rights of way, with the intention of aligning local priority routes with the SATN approach of defining desire lines and then securing deliverable alignments.

Third, the relationship between Quiet Lanes, Public Rights of Way, and active travel connectivity should be made more operational. Policy ED C12 currently requires that development preserves and, where practicable, enhances the rural nature and character of identified lanes and that proposals include a local transport assessment which demonstrates that the quiet rural nature of links between settlements is not diminished. The County Council supports the intent, but recommends that the policy is refined so it is not limited to character protection alone and instead makes clear that Quiet Lanes are also an active travel and road safety intervention. This could include policy wording that expects design and mitigation to reduce speeds and improve conditions for walking, wheeling, cycling and equestrian users, consistent with the Highway Code description referenced in the Plan, and to avoid introducing traffic patterns that would undermine the Quiet Lane function.

Fourth, the Plan should integrate its green corridor evidence more directly with its sustainable transport narrative, while maintaining appropriate safeguards for biodiversity. The TVERC green corridors work is explicit that corridors facilitate movement of both wildlife and people, and that proposed corridors require public access alongside habitat creation or enhancement to function as green corridors. The County Council recommends that this dual function is carried through into the transport policies, so that Policy ED C13 does more than “support” new pedestrian and cycle routes and instead identifies the corridors and rights of way links that are intended to act as the parish’s core active travel spine and connectors, with clear expectations on connectivity, maintenance, and all weather usability where appropriate. This would also reinforce the Plan’s stated intention that CIL and developer contributions may be used to maintain and improve the footpath and path network, and that contributions will be sought in appropriate cases.

In addition to those four principal changes, the County Council recommends targeted strengthening in two specific areas that are currently expressed as aspirations or general support.

The first is public transport enablement. The Plan's objective to preserve and enhance public transport services, and the aspiration to support the bus route serving Dunsden Green, are noted. To translate this into deliverable outcomes, the Neighbourhood Plan could add a criterion within Policy ED C11 (and, where relevant, Policy ED CE1 for community infrastructure) requiring that development proposals protect and enhance bus accessibility through safe, step free walking routes to stops, appropriate waiting environments, and provision for operational needs where development affects the highway network used by services.

The second is implementation and prioritisation. The SATN is explicitly a staged programme moving from demand led desire lines to deliverable alignments and investment decisions. The Neighbourhood Plan would be more effective if it set out, in a plan specific and map based way, the priority links the community wishes to see delivered, particularly those that address the Plan's own evidence on severance and constrained conditions on the A4155 and B478 and the absence of dedicated cycleways. This could be achieved through an identified "active travel network for the parish" diagram or policy figure, supported by a short delivery narrative explaining how priorities will be progressed through developer contributions, CIL, and partnership working with the Highway Authority, reflecting the MAP Plan practice of linking objectives to an investable delivery plan.

Finally, in relation to Paragraph 5.16.4 :

*'Whilst both South Oxfordshire District Council and Oxfordshire County Council are opposed to a new bridge, it has (at the time of writing) not been ruled out, although a new business case is required due to the passage of time. Should such a proposal fall within the time period for this Neighbourhood Plan, it is likely that this would trigger a review, such that the implications could be fully explored and considered.'*

We would like to reiterate that the motion approved by Oxfordshire County Council on 10th September 2019 remains our position on a third Thames crossing:

- Should a new bridge be built it should be restricted to public transport, cyclists and pedestrians.
- The bridge and necessary mitigation measures must not be considered as two separate projects, but as one project.

Subject to the above points being addressed, Oxfordshire County Council considers that the Neighbourhood Plan is directionally supportive of sustainable transport and provides a sound basis to embed MAP Plan principles and SATN compatible network planning at the local level, particularly through Policy ED C11 and Policy ED C13 and the Plan's stated objectives for non motorised accessibility and public transport.

**District:** South Oxfordshire District Council  
**Consultation:** Eye and Dunsden Neighbourhood Plan 2011-2035  
**Team:** Minerals and Waste Policy and Strategy  
**Officer's Name:** [REDACTED]  
**Officer's Title:** Principal Minerals and Waste Policy Planner  
**Date:** 15/01/2026

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We welcome the appropriate reference to the Minerals and Waste Local Plan Core Strategy – Part 1 (2017) and identification of the relevant policies.

We request additional amendments as per the below.

5.4.1: 'Minerals and Waste policy and planning is controlled by Oxfordshire County Council (as shown on figure 23 below) and cannot be considered in this Neighbourhood Plan until the land is no longer required or has been fully restored in accordance with any planning permission and completed the required period of aftercare.'

5.4.2: Whilst we note the community aspiration, text should be clarified here to note that as a County Matter, Minerals and Waste are excluded matters for Neighbourhood Plans, and community aspirations are non-binding and are not formal policies. See further comments below.

5.4.3 – 5.4.6: Note, there is currently an application under consideration for an extension to Sonning Quarry (MW.0036/24).

5.4.7 'Whilst the restoration conditions relating to the planning permission cover 5 years post completion, the legal obligation for the conservation area runs for a period of 20 years.'

Policy ED-VL3: 'Following the restoration and ~~agreed~~ approved aftercare of the site concerned...'

Community Aspiration: 'the Parish Council believe it is key to ~~ensure~~encourage all new development, (including mineral extraction/restoration schemes) maximises the enhancement of the capacity of the floodplain in the Parish....

5.4.10 'Whilst this NP ~~does not seek to~~cannot alter the established mineral sites, or their legal agreements ~~during the above timeframe, or anything that is considered a County Matter~~ ..... ~~Any new sites not currently considered or in operation, should also be considered in the same regard.~~

5.4.12: '~~In particular the restored lakes area which are confirmed as having changed to water-based recreation following a series of consents from Oxfordshire County Council (OCC) are covered by the above policy.~~

5.4.13 'Therefore, the policy can only applyies to those areas already restored areas and when the agreed aftercare has been completed, and at a point where they are

no longer considered a County Matter, acknowledging that minerals and waste matters fall outside the scope of this Plan.

5.7.3: 'The former mineral extraction sites in the Plan area which are considered to have formally completed their agreed aftercare requirements and are no longer considered a County Matter allocated within the Oxfordshire Minerals and Waste Local Plan can be covered within the Eye and Dunsden Neighbourhood Plan.

Policy ED-BG13 Use of the Lakes: 'One land which has completed its agreed aftercare period following mineral extraction....

Local Green Space PH3 – Land at the junction of the A4155 and Spring Lane is within the planning application area for application ref MW.0020/20 for Mineral Extraction at Caversham Quarry which is awaiting determination. This land is required to support the restoration and long term management of the former mineral extraction and is awaiting the completion of agreed aftercare. Therefore we request that Local Green Space PH3 is **deleted** from the Plan until such a time as the agreed aftercare has been completed.

**District:** South Oxfordshire District Council

**Consultation:** Eye and Dunsden Neighbourhood Plan 2011-2035

**Team:** Landscape & Nature Recovery Team

**Officer's Title:** Senior Biodiversity Officer

**Date:** 04/12/2025

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The detailed objective 'Environment, Flooding & Sustainability' is welcomed. A key consideration for this policy is Oxfordshire's Local Nature Recovery Strategy ([Local Nature Recovery Strategy \(LNRS\) | Oxfordshire County Council](#)) which is recommended to be used to identify priority measures for enhancing and creating habitats. Oxfordshire's Local Nature Recovery Strategy also includes priority measures regarding particular species and this should be carefully considered when designing this detailed objective.

The detailed objective 'Environment, Flooding & Sustainability' includes the requirement for all new developments to enhance biodiversity. This approach is welcomed, however to bring this wording in line with the NPPF and local planning policy this wording could be amended to 'all developments are required to demonstrate a measurable net gain in biodiversity'.

Oxfordshire's Local Nature Recovery Strategy is also a key consideration for the biodiversity related policies included within this neighbourhood plan. For example, the LNRS takes into account predecessors such as the TVERC Green Corridor Study mentioned regarding policy ED-BGI1. Oxfordshire's Local Nature Recovery Strategy also includes priority measures regarding particular habitats and species which should be carefully considered when designing this policy.

It is noted that policy ED-BGI1 includes encouragement of delivery of at least 20% biodiversity net gain (BNG) which is welcomed. This policy then subsequently provides guidance on how the BNG spatial hierarchy should be applied, first on site and if not possible within the Parish. Consideration should be given to delivery of BNG within the LNRS within Oxfordshire and the prioritisation of this should be carefully considered alongside delivery of BNG outside of the LNRS but within the Parish.

Consideration should be made of OCC's verge management policy ([CA FEB2123R10 Annex 1 - DRAFT Verge and vegetation policy.pdf](#)) which provides an opportunity for parish councils to enhance the biodiversity of their highway network through submissions using OCC's online form ([Taking action for the environment | Oxfordshire County Council](#)).

**District:** South Oxfordshire District Council

**Consultation:** Eye and Dunsden Neighbourhood Plan 2011-2035

**Team:** Public Health

**Officer's Title:** Health Improvement Practitioner

**Date:** 06/01/2026

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The following comments relate to the potential health and wellbeing implications of the draft Eye and Dunsden Neighbourhood Plan.

The main omission in the NP is a lack of policies with a specific link to human health and wellbeing. In fact, the only mentions of health in the document are in relation to trees and food growing. Oxfordshire's [Neighbourhood Planning Guide](#) contains advice on how to integrate Healthy Place Shaping into strategies and policies. The NP should consider existing and projected community health and wellbeing needs and any assets that can be enhanced to promote health. This includes creating more opportunities for people to be physically active, to make healthier food choices, interact socially and foster good mental health and wellbeing by enabling people to maintain their independence for longer and reducing isolation and loneliness.

Policy ED- BGI4 Local Green Spaces is noted, although this policy would be strengthened further by emphasising the importance of green spaces generally on the health and wellbeing of communities, together with any specific benefits derived from the individual green spaces earmarked for protection.

The NP contains vision and objectives relating to sustainable travel and encouraging the use of pedestrian and non-motorised vehicular modes, but this is not reflected in any specific policy. Oxfordshire's NP Planning Guidance also contains information related to transport in NPs, including advice on [school travel plans](#) which promote healthier and more sustainable travel patterns for parents and children.

Other factors to consider which would create a more health-promoting NP:

- The use of existing community hubs for social interaction and physical fitness.
- How walking routes, nature trails and areas of valued biodiversity could be used to promote health and wellbeing through educational visits, for example.
- The use of wayfinding and signage which fits with the character of the area but also helps to promote the use of active travel routes which help to reduce the reliance on motorised vehicles.

**District:** South Oxfordshire District Council

**Consultation:** Eye and Dunsden Neighbourhood Plan 2011-2035

**Team:** Waste Management

**Officer's Title:** Waste Strategy and Circular Economy Team Leader

**Date:** 2/12/25

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Waste reuse, reduction and recycling appear to have not been considered 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.