

## Goring Parish Council: GNP6 Planning Application Assessment

Assessed by	Name: Goring Parish Council Date: December 2020
Planning reference number	P20/S24488/FUL
Summary of application	GNP6 Revised Full Planning Application

**This form assesses the revised planning application for GNP6 against the policies of the Neighbourhood Plan. It provides a comprehensive assessment to assist SODC identify the areas of compliance and non-compliance and where additional information is required. It includes GPC's previous consultation comments and new additional comments.**

### Summary of assessment:

The Parish Council requests that the new comments (shown in the right-hand column) in the attached assessment should be considered along with its previous comments.

GNP6 is the most visually sensitive of the four sites allocated in the Goring NP and the height of the development is a key issue. As discussed in the previous consultation submission, the original site was allocated for approximately 46 new houses. The boundary of this planning application is significantly different to the site evaluated by the NP and excludes two areas (the triangle and manège/traditional orchard) that were suitable for 8 of these houses. Therefore, this application should be for 38 houses whereas it is now for 49. **The consequence of this much higher number is that the development overflows the acceptable development area/height identified in the NP and is inappropriate for this location at the edge of the village and harmful to the setting of the AONBs and the surrounding landscape. It is still non-conformant to a number of the NP policies including several site-specific requirements which were carefully crafted to enable an area of the site to be allocated for limited development despite its sensitive location at the edge of Goring and in the AONB.**

GPC welcomes the improvements to the design including the sinking of the access road, the removal of 2 of the new houses in the south-east corner, demolition of No. 43 Springhill Rd and the use of this area for improving the pedestrian and cycle link to the site, the nett gain in biodiversity, the strengthening of the vegetation boundary along the gardens of the Springhill Rd properties and the low level and directional lighting plan for the site. The development will provide much needed affordable houses and smaller properties as required by the NP. However, the balance of this proposal is still far too heavily weighted in favour of large-scale development rather than conserving the environment and AONB's.

As previously confirmed, the Parish Council supports the development of GNP6 in line with the NP proposals, but **OBJECTS** to this planning application in its present form because it is still non-compliant with the NP and still constitutes over-development of the site.

**A further re-design should now take place with approximately 38 houses, more sensitive to the setting of the AONBs and compliant with the policies of the NP.**

**Table 1 – Detailed assessment for conformance to NP Policies**

The following symbols signify the level of compliance of the planning application to each NP Policy:

**Y** = the application is compliant with the NP policy or sub-policy

**N** = the application is not compliant with the NP policy or sub-policy

? = more information is required to confirm the level of compliance

n/a = the policy or sub-policy is not applicable to this application

<u>NP Policy Number</u>	<u>Compliance</u>	<u>GPC Comment – Original Application</u>	<u>Revised Compliance</u>	<u>GPC Comment – Revised Application</u>
<b>Policy.01 Number of dwellings to be allocated</b> <i>New development in Goring will focus on the four proposed development sites which will deliver approximately 94 houses.</i>	N	See extensive comments throughout this detailed assessment. Goring Parish Council OBJECTS to this planning application in its current form and it should be refused.	N	See previous comments opposite and additional comments below. Goring Parish Council OBJECTS to this planning application in its current form and it should be refused.
1) Is the development on one of the four sites allocated for housing development or the reserve site (GNP2, GNP3, GNP6, GNP10 or GNP8) houses.		GPC supports the development of GNP6 in accordance with the policies of the NP but does not support this planning application in its current form for the reasons stated below against the various policies.		The site boundary to the north of the site has been extended from that proposed by the developer to the neighbourhood plan. This original site was fully assessed and allocated in the plan. This extension divides into two distinct and separate areas: <ul style="list-style-type: none"> <li>• east of the site access road, where GPC accepts that material planning considerations may apply, allowing creation of a safer road junction with Wallingford Road and addressing inadequate landscaping and means of enclosure of the access road itself as it approaches the main part of the site, also minimising the road's visual impact;</li> </ul>

	<p>The site proposed excludes two areas (the manège/traditional orchard area and the 'triangle') with capacity for approximately 8 of the 46 houses proposed in the NP. It also includes an additional area at the top of the knoll of the hill and above the ridgeline which is unsuitable for either housing development or screening as confirmed in GNP Policy 08, site-specific requirement (SSR) 5 to protect the open hilltop in distant views from the north and to retain the open rolling characteristics of the landscape.</p> <p>Also, the higher up the slope that development extends, the more unacceptably visible the site becomes in long distance views from Lough Down and Lardon Chase.</p> <p>GNP6 was only allocated for development after agreement of stringent mitigation requirements due to the sensitive nature of its location and the potential for visual impact. These are defined in detail in the NP and an analysis follows below of conformance and non-conformance against each policy.</p>	<ul style="list-style-type: none"> <li>• an area north of the main part of the site where the extension has been used to relocate community facilities (open space and play area) into highly visible, sensitive AONB countryside on the crest of the chalk ridge. This has enabled more houses to be proposed on the site, at a higher level and breaching the number specified in the neighbourhood plan. <b>GPC is not aware of any material planning consideration to justify this extension and Objects to the change.</b></li> </ul> <p><b>Over and above the comments above, GPC would appreciate SODC's views on the validity of these two extensions to the allocated site in the context of the Made Neighbourhood Plan.</b></p>	
2)	<p>Is the proposal one of the sites considered and rejected by the Neighbourhood Plan?</p> <p>3) Does the development reflect the scale and character of the village?</p>	<p>n/a</p> <p>N</p>	<p>n/a</p> <p>N</p>
	<p>The proposed development does not reflect the scale and character of the village.</p> <p>The number of houses and hence the density proposed on the developable area of the site is significantly greater than defined in the NP.</p>	<p>Comments to the left still apply.</p> <p>This application is for 49 houses. <b>To conform to the NP, the capacity of the new site being proposed in this planning application should be approximately 38 houses.</b></p>	

	<p>The site proposed excludes two areas (the manège/heritage orchard area and the 'triangle') which had a combined capacity of approximately 8 of the 46 houses proposed in the NP, leaving 38 on the main site currently being proposed in this planning application. This application is for 52.</p> <p>The density of housing in the area of the site suitable for new houses is approximately 35% higher and is non-compliant with the Plan's Spatial Strategy, GNP Policy.08 and the Examination Report which concluded that the housing density proposed in the NP on the edge of the village and specifically on GNP6 was an appropriate balance between protecting and conserving the AONBs and the need for new houses. This is discussed in more detail below in Policy.08.</p> <p><b>The capacity of the new site being proposed in this Planning Application should be approximately 38 houses, plus a possible replacement for the house at 43 Springhill Rd (see comments below in Policy.08), not the 52 being proposed.</b></p>		
4)	<p>Is the development none of the above and outside the built-up area of Gorring? If so, is it necessary or suitable for a countryside location?</p>	n/a	n/a
<b>Policy.02 Infill</b> <i>Is the proposed site filling a small gap in an otherwise built-up frontage or on other sites within the built-up area of</i>		GPC requests that SODC should make the below comments a condition of any subsequent acceptance of a planning approval for this reduced site.	GPC requests that SODC take account of the comments to the left when considering this and future application

<p><i>Goring where the site is closely surrounded by buildings. If so, all of the following tests must be met:</i></p>	<p>Y (but see comments opposite)</p> <p>The developers Planning Statement, page 5 , lists relevant NP policies but misses this Policy.02 on the basis that the proposed site is not infill. The Sustainability Report does the same. However, the site allocated in the GNP included two areas that are now excluded from the revised site. These could potentially be proposed as future infill sites. The proposed design of the site in the current planning application facilitates the subsequent development of these two areas (e.g housing layout and road design).</p>	<p>Y (but see comments to the left and opposite)</p> <p>In the event of future applications for infill development relating to the manège and/or 'triangle,' GPC requires assurance that, in principle, the mitigation measures proposed in the Plan will apply in full to these areas. In addition, these future planning applications should be required to provide a number of affordable homes to make up the number required as if the site had been developed as a whole as originally proposed to the NP.</p>	<p>- Manège area and traditional orchard: Design and Access Statement 3.1.page 11 identifies the manège for 'potential future development.' Plans show an access road has been left available. This area is open to future development and presented as an infill site of circa 4 dwellings.</p> <p>- Triangle: this area is open for future development and presentation as an infill development with an opportunity to take access from the service road or direct from Wallingford Rd. This would provide up to 4 dwellings.</p> <p>SODC should take this into account when considering this application and should include a planning condition to ensure that <b>all of the site-specific requirements in Policy.08 that mitigate the impact of the overall site</b></p>
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		<b>are met in full, including the overall provision of affordable houses.</b>		
1) Is there any loss of important open public space?	n/a	But see comments in Policy.08	n/a	But see comments in Policy.08
2) Is there any loss or anything of environmental or ecological value?	n/a	But see comments in Policy.08	n/a	But see comments in Policy.08
3) Is there any loss or harm to an important public view? In particular, the views that must be protected are the following:				
a. between Goring and Gatehampton;				
b. between Goring and South Stoke;				
c. east of Goring above Fairfield Road;				
d. north east of Goring between Icknield and Elvendon Roads;				
e. within the river setting;				
4) Does the proposal constitute backland development? if so:	n/a	But see comments in Policy.08 regarding the triangle and manège/orchard area.	n/a	But see comments in Policy.08 regarding the triangle and manège/orchard area.
a. Would it extend the built limits of the village?				
b. Would it create problems of privacy and access?				
5) Is the scale of development appropriate to the neighbouring area and does the development have a neutral or positive impact on its character?	n/a	But see comments in Policy.08	n/a	But see comments in Policy.08

<b>Policy. 03 Housing Mix</b> <i>A mix of dwelling types and sizes to meet the needs of current and future households and all the following tests must be met:</i>	Y	Y	
1) Does it include a significant proportion of 1, 2 or 3-bedroom units, low cost/affordable accommodation and properties suitable for older people?	Y	<p>SSR1 requires 'at least 35 of the (46) new dwellings will be 1, 2 or 3 bedrooms.' The application form states that 41/52 (78%) will have 1, 2 or 3 bedrooms.</p> <p>The proposal for 51 additional dwellings in total includes 20.4 affordable units (40%) on site to rent and buy. 0.4 will be a financial contribution offsite (Planning Statement App3).</p> <p>A range of house types, including bungalows, will be provided to meet a range of needs including older peoples. All units are designed to be accessible and comply with Approved Document M1 (Access to and use of buildings).</p> <p>SODC requires affordable housing to be 'pepper-potted' throughout the development. This is proposed in Proposed Site Plan 19_149-100E. (Note: in proposed site plan 19_149-100E the units shown do not match the key colour coding).</p>	<p>Total number of houses has changed to 49 and housing mix numbers are ratioed accordingly. The number of affordable houses is now 19.2, of which 19 would be onsite and the 0.2 as a charge on the developer.</p> <p>Y</p>
2) Are at least 5% of any affordable housing dwellings on the site designed to the standards of Part M (4) category 3: wheelchair accessible dwellings (or any replacement standards)?	Y	<p>One (5% of 20) dwelling will meet this standard - Unit 8, an affordable rented unit.</p> <p>?</p>	<p>MIGGS commented that the location of this unit was inappropriate at the highest, and least accessible point in the site. GPC believes this could be better located near the pedestrian/cycle access to Springhill Road, which is also conveniently served by bus.</p>

3) Are all affordable housing and 1 and 2 bed market housing dwellings designed to meet the Nationally Described Space Standards?	Y	Nationally Designed Space Standards are required by SODC for all affordable units	Y
4) Does the site contain 11 or more dwellings? If so, apply the following Tests:	Y		Y
a) Are all affordable dwellings on the site designed to the standards of Part M (4) category 2: accessible dwellings (or any replacement standards)?	Y		Y
b) Are at least 15% of market housing dwellings on the site designed to the standards of Part M (4) category 2: accessible dwellings (or any replacement standards)?	Y		Y
<b>Policy. 04: Housing for the elderly</b> <i>If the development is purpose-built housing for people aged 55+ and/or 75+ this policy applies.</i>	n/a	n/a	
<b>Policy. 05: Affordable housing</b> <i>If there is a net gain on the site of 6 or more dwellings this policy applies and all the following tests must be met:</i>	Y	Y	Please also see the comments in Policy 02 regarding affordable houses in the two areas not included in this proposal.

1) Are 40% or more of the dwellings affordable (including a financial contribution for any part dwellings)?	Y	20.4/51 (40%) would be affordable under this proposal	Y	19.2/49 (40%) would be affordable under this proposal.
2) Is the tenure mix of the affordable housing will be 75% social rented and 25% shared ownership by the most up-to-date housing evidence?	Y	This is the tenure mix required by SODC and proposed by the applicant	Y	See comment to the left
3) Does the site contain both market and affordable housing?	Y	Yes. Affordable homes are pepper-potted across the site	Y	See comment to the left
4) Are all affordable dwellings provided on this site?	Y	Yes, although the final fraction will be provided by contribution off-site	Y	See comment to the left
<b>Policy.08 Site-specific requirements GNP6</b>		Policies 6-10 are for the 5 different sites allocated in the NP. Policy.08 is for GNP6.		Comments to the left still apply.  <b>Because of the sensitivity of this development, conformity with all SSRs is essential for the site to be acceptable for development.</b>
<b>Policy.11: Conserving and enhancing Goring's landscape</b> <i>If the proposal affects the setting of the Chilterns AONB or North Wessex Downs AONB, this policy applies and all the following tests must be met:</i>		N	This planning application does not comply with Policy.11 to conserve and enhance Goring's landscape or the AONBs. See also the comments throughout this document and in particular Policy.08 below.	The site boundary to the north has been changed from that proposed to the NP by the developer. As described above, the current proposal relocates community facilities (open space and play area) in sensitive AONB countryside outside the original boundary and at the site's highest point. This has enabled more houses to be built in the

		lower part of the site, breaching the housing numbers and levels specified in the NP.
		<p><b>The balance is still weighted too heavily in favour of housing development rather than the environment. Removal of the row of 7 houses to the north of the site would bring the number closer to that specified in the NP for the equivalent site, minimising the harmful visual impact of the proposed development on the landscapes and settings of two AONBs.</b></p>
1) Does the proposal conserve and enhance the AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation?	N	<p>GNP6 was allocated in the NP for housing development. Because of its location at the periphery of the village and in the AONB the design of the site is subject to strict and extensive mitigation. The NP and supporting evidence clearly describe the planning constraints, requirements and required mitigation for this site. Without this mitigation the whole site is unacceptable for development.</p> <p>The Spatial Strategy in the NP states (page 28)  <i>"A recent planning appeal in Goring ruled that a lower density of development will be required to retain the township and landscape character at the periphery of the village."</i>  <i>"The spatial strategy adopted by the Plan is one of small to medium sites, either brownfield or on the periphery and contiguous with the edge of the village, together with housing densities that are higher in the urban centre and lower on the periphery. This will optimise the efficient use of land, protect against urban sprawl, protect</i></p> <p>In summary:</p> <ul style="list-style-type: none"> <li>- GNP6 is a highly sensitive site set in the Chilterns AONB and overlooked by North Wessex Downs AONB.</li> <li>- Its vulnerability was carefully considered at the NP examination and the conclusion was that it was only suitable for development subject to the highly specific SSRs in the Plan, intended to minimise its visual impact.</li> <li>- Two Landscape and Visual Impact Assessments (Bramhill for Goring Neighbourhood Plan, and Kirkham/Terra Firma for SODC) agreed that the major constraint on this site relates to the upper height at which development is, on balance, acceptable and can be mitigated adequately. The potentially developable area is described in the figure below from the Bramhill Supplementary 2 LVA Report.</li> </ul>

	<p><i>the AONBs and ensure a gradual transition to the open countryside".</i></p> <p><b>In the Report of the Examination of the Goring Neighbourhood Plan, 29th March 2019, Timothy Jones, Barrister, Independent Examiner (in para 41) states that GNP6 is "a site where inappropriate design could be particularly harmful. In the circumstances the carefully framed terms of the policy (GNP Policy.08) are important".</b></p> <p>The planning application has a higher density and housing is developed over a larger and higher area than specified in the NP. <b>The balance is weighted too heavily in favour of dense development rather than the environment.</b></p> <p>Policy.08 below discusses the various elements of this requirement and where the planning application is conformant and non-conformant and makes a number of observations and suggestions. In its current form this planning application is unacceptable.</p>	 <p>The most important views at risk are:</p> <ol style="list-style-type: none"> <li>1. Approaching Goring from the north on the B4009 where it is essential to: <ul style="list-style-type: none"> <li>ensure protection for the characteristic clean skyline of the rolling, chalk landscape in its wider setting.</li> <li>protect the prominent crest of the knoll at 74m which locally hides the village from view.</li> <li>resist the visual threat from the 7 most northerly dwellings located at c 67.75m. The proposal does not give ridge heights but 1.5 storey houses are typically 7.5m high.</li> <li>recognise that the proposal does not address the future threat of features added later by residents eg TV aerials, roof extensions, chimneys, sheds, fences, trees etc which will be visible above the skyline.</li> <li>note that any woodland screening planted at or above the level of the proposed houses will be visible. In the plans, the woodland belt planting is</li> </ul> </li> </ol>
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	<ul style="list-style-type: none"> <li>at 71-72m. The species listed mature at between 4-12m.</li> <li>note that the Public Open Space and LEAP are located at the lowest point on the ridge line leading up to the knoll but planting proposed here includes hornbeam, oak and beech which can exceed 12m at maturity.</li> <li>note that the Chilterns Conservation Board has commented strongly in support of the principle of the clean, rolling skyline.</li> </ul> <p>2. Long-distance, nationally important views across the Goring Gap from Lough Down and Lardon Chase in North Wessex AONB where:</p> <ul style="list-style-type: none"> <li>the upper 7 houses will be fully visible in the view (ref Clews' photographs from Viewpoints C and F).</li> <li>further visual damage will be caused by the excessive (and expensive) cutting into the hillside to achieve level building platforms for these 7 houses. This is noted by SODC's Landscape Officer.</li> <li>houses lower on the site will be partially screened by trees in the long term.</li> </ul> <p>3. Local view from public footpaths and the permissive path on Cow Hill:</p> <ul style="list-style-type: none"> <li>from which the upper part of the development will be fully visible in near views;</li> <li>which forms an important local amenity for walkers, in particular for dog walkers.</li> </ul> <p><b>It is the Council's view that if all of the upper 7 houses were removed, a more reasonable balance of benefit v harm could be achieved.</b></p>
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a) Is the proposal appropriate to the economic, social and environmental wellbeing of Goring or is it desirable for its understanding and enjoyment?	N	See comment above and below re spatial strategy, density, landscape and vegetation and the overall balance of this planning application.	N	Comments to the left still apply.
2) Does the proposal meet the aims of the statutory Chilterns AONB Management Plan?	N	See comment above and below re spatial strategy, density, landscape and vegetation and compliance of these proposals to the Chilterns Design Guide	N	Comments to the left still apply. Please note the comments from the Chilterns Conservation Board
3) Does the proposal avoid adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated?	N	See comment above and below and in addition the comments on Policy.08 regarding planning provisions for any future development on the triangle and manège/orchard areas.	N	Comments to the left still apply.
<b>Policy. 12: Conserve and enhance biodiversity</b>			Y	Suitable Ecology and Biodiversity documents are now included as part of this planning application
1) Does the proposal demonstrate a net gain in biodiversity?	?	The Planning Statement (para 7.40) confirms that a biodiversity calculation will be submitted as evidence that net biodiversity tests must be met.	Y	Suitable Ecology and Biodiversity documents are now included as part of this planning application

	(but see comments opposite)		
2) Does the proposal include management plans to ensure new and replacement biodiversity features are sustainable over the long term?	N	The Planning Statement (para 7.70) and Appendix 3 state that a financial contribution will be required in relation to the maintenance and management of the Public Open Spaces and Play Areas. However, the Planning Application does not include management plans regarding the sustainability of biodiversity features or the Public Open Spaces.	<p>Y</p> <p>The applicant proposes that the public land, including wooded margins, should be managed by a private management company and that the approval of management plans could be approved through a planning condition of the S106 requirements.</p> <p><b>To ensure compliance with the NP, GPC requests that this should be included as a condition of acceptance of a planning application.</b></p>
3) Does the proposal protect and retain all mature trees and hedgerows wherever possible?	Y	To ensure compliance with the NP, this should be included as a condition of acceptance of a planning application.	<p>Y</p> <p>The Arboricultural Impact Assessment included with the Planning Application states that existing trees will be retained where possible. It is important that existing hedgerows are also retained and enhanced where possible</p>
4) Does the proposal protect and conserve all rare species?	Y	There are no rare plant species identified but the Bat Report included by the developer as supporting information identifies the possible appearance of various species of Bats and makes provision for their protection	<p>Y</p>
<b>Policy. 13: Light Pollution</b> <i>Development proposals must include external lighting schemes which include design features and mitigating measures to minimise light pollution. This policy applies to all new</i>	N	The developers Planning Statement, page 5, lists relevant NP policies but misses this Policy.13. In fact, it is very relevant to this planning application which is for a site on the edge of the village and in the AONB. Limiting light pollution for road access, for neighbouring properties and for long views is an important consideration. Low level lighting	<p>Y</p> <p>The new planning application includes a lighting plan showing low-level LED bollard lighting along the sunken access road which will not be visible above the ridgeline and directional lighting columns within the development with cowls to direct light to the street surface only.</p> <p>The prominent crest of the knoll is at 74m.</p>

	<p><i>development (including infill), and all the following tests must be met:</i></p> <p>has been proposed for the access road but there is little else in this planning application or its attached Sustainability Statement to illustrate the strategy and design to ensure that lighting is appropriate. For example, given the steep slope on the site, limiting light pollution impact on existing houses on Springhill Road, which currently benefit from dark sky to the rear of the properties and preventing the subsequent installation of bright garden or household lighting/spotlights.</p>	<p>Within the development, lighting columns will be 4m tall according to the lighting plan (but 6m tall according to the LVIA). Plans show that along both sides of the northern-most road, columns will be installed at 67-68m. This gives very little clearance below the hill crest and the glow is likely to be visible from the north.</p> <p>Removal of the northern-most 7 houses would mean lighting could be confined to the south side of the road and set back from the crest of the hill. The number of lighting columns would be reduced and therefore the visible glow would be reduced.</p>	
1)	Does the proposal include an external lighting scheme which avoids over-lighting?	See above comment	See above comments
2)	Does the proposal include an external lighting scheme which limits the adverse impact on neighbouring residents?	See above comment	See above comments
3)	Does the proposal include an external lighting scheme which limits the adverse impact on the rural character of the countryside?	See above comment	See above comments
4)	Does the proposal include an external lighting scheme which limits the adverse impact on biodiversity?	See above comment	Y
<b>Policy. 14: Air quality and pollution</b>		The developers Planning Statement, page 5, lists relevant NP policies but misses this Policy.14.	

<b>Policy.15: Water, Sewerage and Drainage capacity</b> <i>All development proposals must demonstrate that there are or will be adequate water supply and water treatment facilities in place to serve the whole development.</i>	?	<p>There is little comment on this requirement in the planning application at this stage</p> <p>Y</p>	<p>Thames Water comments that the water network in this area can support only 49 additional dwellings, beyond which upgrades to the network will be required. It is noted that this proposal is for 49 dwellings and that therefore future water services may be constrained.</p> <p>The developer has submitted details of surface water and foul water drainage and has confirmed that they can be handled appropriately.</p>
<b>Policy. 16: Building design principles</b> <i>All development must respect and maintain the character of the village and the surrounding rural AONB, must meet tests 1 to 7 below and should satisfy test 8:</i>	N	<p><b>The design and density proposed in this planning application is not appropriate in its current form.</b></p>	<p>Comments below and to the left still apply.</p> <p>The developer has confirmed that he would accept planning conditions to ensure the removal of permitted development rights where there is a danger of breaching Policy.08 SSR5, the skyline and 'urbanising' the rural margins of the development, in particular:</p> <ul style="list-style-type: none"> <li>• the ability from September 2020 to extend a property in height eg by adding 1 or 2 additional storeys,</li> <li>• to prohibit garden fencing/trellis &gt;1m high, sheds and tree planting near the northern boundary of gardens adjacent to the permissive path</li> <li>• to prohibit TV aerials, satellite dishes or chimneys on buildings.</li> </ul> <p><b>GPC requests that these planning conditions should be included as part of any approval.</b></p>

1) Does the proposal comply with SODC's Design Guide?	<p>A key design objective of SODC's Design Guide is:</p> <p><i>"respects the local context working with and complementing the scale, height, density, grain, massing, type, details of the surrounding area".</i></p> <p>While the design details of the buildings proposed are generally acceptable (see below), as stated above the high density of this proposed development (52 houses instead of the equivalent 38 allocated in the NP for the land now allocated by the developer), on land on the rural edge of a village, adjacent to AONB countryside, is inappropriate. Further, it is out of keeping with the characteristic density of the surrounding areas. The steeply sloping site and the close proximity of the buildings and many brick retaining walls in the current site design will accentuate the height and mass of the development and create an 'urban' appearance rather than a 'rural' one. On these grounds it does not meet the Design Guide objective above, as it does not respect or enhance local distinctiveness or the rural-edge nature of the site.</p>	<p>N</p> <p>The northern-most 7 dwellings require a very large amount of excavation at a highly visible level and grading to form platforms for building. GPC believes this to be environmentally insensitive for this row of 7 new homes which will be visibly prominent in the AONB. A more sensitive solution would be to remove these houses and grade this part of the site north of the road to align the hillside with the Public Open Space to the east.</p>	<p>Comments to the left still apply.</p>
2) Does the proposal comply with the Chilterns Buildings Design Guide?	<p>N</p> <p>For Chilterns villages, the Chilterns Conservation Board Design Guide points to the need for new housing estates to be small, and discretely located to fit in with the editing fabric of the villages. During GNP consultations Goring residents stated clearly</p>	<p>N</p> <p>Comments to the left still apply.</p>	

	<p>that they preferred small and medium sized sites rather than larger sites.</p> <p>The CCB Guide also notes that new housing estates are often of uncharacteristic layout and design, out of context with their surroundings and unsympathetic to the adjacent village, a statement reflected in the current proposal.</p>		
	<p>While the design detail of the buildings proposed is generally acceptable (Policy.08 below), the high density of this development on the rural edge of the village, adjacent to AONB countryside, is not.</p>	<p>The steeply sloping site, the close proximity of the buildings and the many retaining brick walls will accentuate the height and mass of the development and create an 'urban' appearance rather than a 'rural' one. On these grounds it does not meet the Design Guide objective above, as it does not respect the semi-rural location or enhance local distinctiveness.</p>	<p>Comments to the left still apply.</p> <p>While the reduction of 3 in the number of dwellings proposed is welcome, especially the decision not to redevelop the site of 43 Springhill Road, it does not go far enough.</p>
3)	<p>Does the proposal respond positively to scale, mass, density and design of the immediate area and the village context?</p>	<p>N</p> <p>See comments above. While the building designs and materials are largely appropriate, the number of units, density and design currently proposed is unacceptable to the Parish Council and in clear breach of NP policies.</p>	<p>N</p>
4)	<p>Does the proposal conserve and enhance the characteristics of the Conservation Areas and their settings that make a significant contribution to the area?</p>	<p>n/a</p>	<p>n/a</p>

5) Is the development in an-edge-of-village location? If so: a) Does it acknowledge the Plan's spatial strategy? b) Is it sensitive to the transition from urban to rural character?	N	See comments above and below. This is a key issue and the current density and site design is unacceptable to the Parish Council and non-compliant with the NP.	N	Comments to the left still apply.
6) Does the proposal sympathetically introduce high quality, modern design in appropriate locations?	N	See comments above and in Policy.08	N	Comments to the left still apply.
7) Does the proposal respect and protect the AONB?		See comments above and in Policy.08  For dwellings towards the higher parts of the site, (at or above 65m AOD), SODC is requested to impose a planning condition removing permitted development rights, in particular: a) the ability from September 2020 to extend a property upwards by 1 or 2 additional storeys, and b) to prohibit garden fencing/trellis >1m high along the northern boundary of gardens adjacent to any permissive path.		
			N	Adding stores, TV aerials or satellite dishes to buildings in this situation, and erecting high fences (or planting trees) in the highest part of the site risks breaching the skyline, and breaching Policy.08 SSR5, in addition to 'urbanising' the rural margins of the development.

<b>Policy.17: The Historic Environment</b>	<p><i>The parish's designated historic heritage assets and their settings, both above and below ground including archaeological sites, listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.</i></p>	<p>Y</p> <p>?</p>	<p>Goring village centre is a conservation area with a narrow road and pavements and a sharp and narrow junction at the bridge onto Wallingford Rd. Congestion along Streteley high street into Goring is a major problem. There is also a 7.5 tonne weight restriction in through the village.</p> <p>Lorries delivering site machinery (e.g. cranes, diggers) and materials and carrying away excavated material, will cause chaos and major safety issues as well as potentially causing damage to the narrow verges and highways if they are permitted to travel through the village centre.</p> <p>?</p> <p>Y</p>
			<p>Additional archaeology work has been undertaken at the site in the form of a geophysical survey and trial trenching. Whilst these reports are yet to be finalised it has been confirmed that neither exercise found any significant archaeological deposits at the site.</p>
		<p>1) Does the proposal include any of the parish's designated historic heritage assets and their settings, both above and below ground including archaeological sites, listed buildings, scheduled monuments and conservation areas?</p> <p>If so:</p>	<p>n/a</p> <p>An archaeological desk-based assessment has been submitted as the proposal has potential for archaeological and historical implications. This is in line with NPPF and SODC requirements. Although no known heritage assets are recorded within the site</p>
		<p>2) Does the development affect any non-designated historic assets in the Parish?</p> <p>If so:</p>	<p>Y (but see comments opposite)</p>

	<p>itself, the local area is known to be archaeology-rich. As any development has potential to damage or destroy any archaeological objects, SODC is requested to apply a planning condition to ensure monitoring and recording of the site and protection/mitigation for any future finds.</p> <p>A palaeontological desk-based report has been submitted to address the discovery of Ichthyosaur bones in the vicinity. This concluded that the local geology meant it was highly unlikely that they were found locally in situ, and no further action is required.</p>	
<b>Policy.18: Open space, sport and recreation in new residential development</b> <i>New residential development will be required to provide or contribute towards accessible sport and recreation facilities, including playing pitches, in line with SODC's most up-to-date Leisure Strategy, and Sport England guidance.</i>	<p>?</p> <p>Y</p>	<p>The developer has confirmed that should a request be received it will be considered alongside the package of other S106 requests.</p>
<p>1) Does the proposal provide or contribute towards accessible sport and recreation facilities, including playing pitches, in line with SODC's most up-to-date Leisure Strategy, and Sport England guidance?</p> <p>2) Are any open spaces, sport, or play facilities, or playing pitches delivered on site?</p>	<p>?</p> <p>Y (but see comment opposite)</p>	<p>The Draft Heads of Terms regarding any S106 agreement do not mention this aspect of Policy.18. SODC should ensure that the planning application satisfies its latest strategy and guidance in this area.</p> <p>A new children's play area (LEAP) is included in the design, but LVA 5.19 says it will be unfenced.</p> <p>Note that Policy.08 SSR7 requires a secure play area.</p>
		<p>See comment to the left. The developer states "<i>the play area will be enclosed by more natural forms of enclosure given the sensitive nature of this part of the site</i>".</p> <p><b>GPC considers that a young children's play area such as that required on this site should be physically enclosed</b></p>

		<p>with fencing and a gate for the safety and security of the children. The developer's comments above reflect their planned location of the playground on the crest of the hill on the perimeter of the development. If it was lower down the slope and nearer the centre of the development then this would not be an issue.</p> <p>GPC would like the safe and secure enclosure of the playground to be a planning condition.</p>	
3)	Is there provision for the future long-term maintenance and management of the open space and facilities within the planning application?	N	<p>Provision for the long-term maintenance and management of the open space and facilities must be confirmed prior to acceptance of this planning application.</p> <p>Y</p>
<b>Policy.19: Adequate parking within new developments</b>		<p><i>Proposals for new residential development, including extensions, should provide adequate parking provision.</i></p>	
1)	Does the development, including extensions provide adequate parking provision at least in line with Local Plan guidelines?	Y	<p>The planning application confirms that on site and community parking facilities have been provided in line with national requirements. See details in Policy 08 SSR14 below.</p> <p>Y</p>
2)	Is the parking provided on-plot?	Y	<p>See details in Policy 08 SSR14 below.</p> <p>Y</p>

a) If not, has the reasoning for this design been set out in the Design and Access Statement and an alternative formally designed into the proposed Scheme?	n/a	n/a	
b) Does the design discourage informal, inconsiderate parking?	Y	There are a number of unallocated parking places provided for visitors in the design of the site	Y
<b>Policy. 20: Walking and cycling</b> <i>Proposals for new residential development should ensure that the site and routes from the site to the village centre are accessible and safe for all users, including pedestrians, cyclists, people with disabilities and deliveries.</i>	N	The Planning Statement, page 5, lists relevant NP policies but misses this Policy.20. In fact, it does apply to this planning application and GPC has a number of comments and concerns as shown below.	N
		Comments opposite still apply.  GPC recognises that the footpath/cycle path from GNP6 to Springhill Rd from the main site has been improved and widened in the amended proposal. Also, that the road access and associated footpath along the access road within the site has been improved. However, OCC should give full consideration to provision of safety railings at the end of the pedestrian/cycle path on the northern side of Springhill Road and a suitable yellow line and built-out pavement strategy for the south side of the road. Safety at this critical junction is paramount.	In addition, additional traffic calming and a controlled pedestrian crossing may be required on Wallingford Rd given the recorded average speeds reported by the applicant well in excess of the 30mph limit. The Highway Authority should be requested to reconsider its position on this.
			GPC fully supports the consultation input by MIGGS and requests that their comments are considered fully before this planning application is approved.
			It is important that the safety and integrity of the pedestrian, cycle and road access to and from this site

	<p>along Wallingford Rd to Springhill Rd and in Springhill Rd itself around the pedestrian and cycle access, are examined professionally as part of this planning application. Detailed design improvements to the highway and pavement network are needed in both areas.</p> <p><b>GPC notes OCC's comments re S278 requirements. GPC requests that the appropriate Highways enhancements should be defined in detail for both Wallingford Rd and Springhill Rd and committed to as part of this planning application, before approval is granted by SODC.</b></p>	
1) Does the development provide safe pedestrian access which links up with existing or proposed pathways and cycle routes, ensuring that residents, including those with disabilities, can walk or cycle safely to village amenities?	<p>N</p> <p>The Travel Plan statement (3.2.2) states, incorrectly, that there is a footway on the north side of Springhill Road. In fact, the footway is on the south side of the road. Pedestrians and cyclists leaving or entering the site on the north side of the road will be protected by a barrier but this alone is inadequate to enable safe crossing.</p>	<p>N</p> <p>Comments to the left still apply. Also see above comment (for Policy 20)</p> <p>There is local concern that, because there is no pavement on the north side of Springhill Road and there are frequently parked cars on the south side of the road, that cycle and pedestrian access onto Springhill Road is unsafe. Visibility up and down Springhill Road will be limited; there are no splay or pedestrian pavements shown in the plans. This pedestrian and cycle route will be used by children going to / from school and the playgrounds (GNP6 LEAP and Bourdillon).</p> <p>It also needs to be accessible for wheelchair and other mobility aids.</p>

	<b>SODC should ensure that a safe and suitable pathway, entrance, exit and road crossing is provided before approving this application.</b>		
2) Does the development improve and extend the existing footpath and cycle path network, allowing better access to the local amenities and services, to green spaces, to any new housing and to the open countryside?	Y	But see comments above regarding the absence of a safe road crossing for Springhill Rd.	Y Comments to the left still apply.
3) Does the development proposal demonstrate optimisation of connection to the village centre and other amenities (including access to the countryside)?	Y	But see comments above regarding the absence of a safe road crossing for Springhill Rd.	Y Comments to the left still apply. Also see comments above (for Policy 20).
4) Does the development adjoin a public footpath or bridleway?	Y	The development includes access to a permissive footpath which is relocated.	Y Comments to the left still apply.
a) If so, does the proposal maintain the rural character of the footpath or bridleway?	N	The proposed development will be adjacent to the permissive footpath to the north. Boundary treatments using brick retaining walls and native species are specified in the LVA but the close proximity of the northern-most houses and garden vegetation to this permissive footpath will significantly change its rural character. The highest properties will lie below the permissive path and privacy might be an issue. However, erection of closeboard fencing/trellis here would be damaging to the rural character and SODC is requested to remove permitted development rights for properties bordering the field.	N <b>Removal of the 7 units towards the top of the site would potentially resolve this issue. The northern-most houses would then be on the south side of the road, facing open countryside. Back gardens would retain their privacy and the permissive path would retain a more rural character.</b>

5) Does the proposal avoid or minimise the loss of mature trees and hedgerows?	Y	This intention is stated in the Arboricultural Impact Assessment attached to the planning application.	Y	
6) Does the proposal use materials that are consistent with a rural location when creating new pedestrian and cycle links from adjoining development schemes to a public footpath or bridleway?	Y <small>(but see comment opposite)</small>	Surfaces for roads and paths appear to be sympathetic to a rural location but black estate railings would be more appropriate than white.	Y <small>(but see comments to the left and opposite)</small>	GPC requests a planning condition that materials should be submitted to SODC for approval before use.

**Table 2 – Site-specific requirements for GNP6**

NP Policy Number	Compliance	GPC Comment – Original Application	Revised Compliance Comments to the left still apply.  <b>N</b>  Allocated site GNP6 - The site between Wallingford Road and Springhill Road of approximately 3.8ha is allocated for approximately 46 new homes.  A Masterplan (as part of the planning application) will be supported provided that the proposed development complies with the following site-specific requirements:  The comments below are a top-level summary and the back cloth to the analysis of the planning application and why it needs to be redesigned.  As explained in the comments against Policy.01, the site proposed in this planning application has a significantly different boundary. It excludes two areas of land that had capacity for approximately 8 of the 46 houses proposed in the NP. These two areas of land were part of the site evaluated by the NP and were originally proposed by the developer but are owned by a different land owner.  The site now being proposed also includes an additional area of farmland at the top of the knoll of the hill and above the ridge line that is not suitable for housing development or uncharacteristic vegetation as confirmed in the NP, its supporting LVIA and specifically in Policy.08, site-specific requirement (SSR) 5 (see below).  As mentioned in Policy.11, the Spatial Strategy in the NP states (page 28) “A recent planning appeal in Goring ruled that a lower	GPC Comment – Revised Application
<b>Policy.08 – Site-specific requirements for GNP6</b>				

	<p><i>density of development will be required to retain the township and landscape character at the periphery of the village</i>". It further states "The spatial strategy adopted by the Plan is one of small to medium sites, either brownfield or on the periphery and contiguous with the edge of the village, together with housing densities that are higher in the urban centre and lower on the periphery. This will optimise the efficient use of land, protect against urban sprawl, protect the AONBs and ensure a gradual transition to the open countryside".</p> <p>In the Report of the Examination of the Goring Neighbourhood Plan (para 36), 29th March 2019, Timothy Jones, Barrister, Independent Examiner, states <i>large-scale development would have a major adverse impact on both the landscape and visual amenity in the areas immediately around the site</i>".</p> <p>...and further (in para 41) states that GNP6 is "<i>a site where inappropriate design could be particularly harmful. In the circumstances the carefully framed terms of the policy (GNP Policy.08) are important</i>".</p>	<p>that, if developed, would require stringent mitigation. These factors were taken into account when estimating the number of dwellings that could be realistically accommodated on this site.</p> <p>The NP states clearly that amount of development should be informed by balancing:</p> <ul style="list-style-type: none"> <li>• the capacity of the site and the need to use land efficiently;</li> <li>• the need to achieve high quality design that respects local character; and</li> <li>• local circumstances and site constraints, including the required housing mix, and the need to protect the local environment, in this case two Areas of Outstanding Natural Beauty, both landscapes of national importance.</li> </ul> <p>The method of reasoning and numbers were discussed and agreed with SODC.</p> <p>The total was approximately 46 overall. Approximately 8 units were assessed for the manège and 'triangle' and approximately 38 for the main site.</p> <p><b>It is also significant that the number of new houses on this site was confirmed in the independent examination of the NP and subsequently supported by the community before the NP was formally Made by the District Council.</b></p> <p>The planning application in its present form should be refused. The proposed number of houses and the design on this site at the edge of the village and in the AONB is non-compliant with the NP.</p>
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	<p><i>This zone is identified in blue.... it would not be possible to fit 46 separate dwellings into this portion of the site”.</i></p> <p>A factual representation (Bramhill page GNP6-5) is that this area, quote, “<i>has capacity to accommodate some development with stringent planning conditions as to design, landscape and planting. Without mitigation it would not be suitable for development</i>”.</p>	
	<p>The diagram in Section 3.1 of the Design and Access Statement also includes a large brown area reaching towards the top of the site which is described as “<i>less suitable for development unless strict recommendations regarding visibility and other conditions are met</i>”. In fact, this area (excluding the triangle) was specified in the main Bramhill Report as not suitable for development with or without mitigation. The subsequent Supplementary Report, Jan 2017 (para 80) stats “whilst development above the 65m contour may not be visible, development up to the 70m contour certainly will be visible. <b>Many</b> houses, retaining walls, trees and vegetation are included in this area in the planning application. In this proposal, 7 units are located above the 70m contour and 20 in total are above the 65m contour.</p>	<p>The planning application proposes a housing density in the area of the site suitable for housing development which is approximately 35% higher than that</p>

	<p><b>proposed in the NP. It is inappropriate for this site and non-conformant with the NP.</b></p> <p>Regarding protection for the clean line of the crest of the hill and the characteristic rolling chalk countryside, the NP states (Section 6.3.3) “<i>the site rises from the village built area to the top of a small knoll on the edge of open rolling landscape.....The ridge immediately north of the site forms a sharp crest in southbound views from the Wallingford Road and is typical of the surrounding open, rolling landscape. Development on the site should ensure that the characteristic landform of this part of the AONB is retained and not broken by the rooftops of any new dwellings or by uncharacteristic vegetation</i>”.</p> <p>The SODC Planning Officer in the pre-app consultation report (p2, para 3) clearly accepts and agrees with this requirement for protection of a ‘clean’ hillcrest. Detailed cross sections along a series of sight lines were requested to ensure the hillcrest remains clear of buildings and vegetation from a range of positions on the B4009 between Goring and South Stoke. Only one has been included in the LVIAs.</p> <p>The requirement to keep the characteristics of the crest of the hill is defined below in Policy 08 SSRS5 (GNP p59) as “<b>Rooftops and screening for houses</b> on the site should not be visible above the ridge line in views from Wallingford Rd, particularly from between Spring Farm Barns/Cottages and 91</p>
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	<p><i>Wallingford Rd but also from the road to the north of the Spring Farm hamlet. Detailed cross-sections should be taken along a series of sightlines including those shown on plan below to make sure that this condition is met.”</i></p>	
	<p>All of this is summarised inaccurately in the planning application Planning Statement 7.9 p19 as: ‘<i>Rooftops should not be visible above the ridge line; the application should include cross sections.</i>’ From this stem the presumption throughout the application that tree planting to screen rooftops is acceptable on the skyline. It is not. <b>The line of uncharacteristic new vegetation and trees on the ridge line proposed in the planning application is in breach of GNP Policy.08 SSR5.</b></p> <p>The Planning Application states that rooftops will not be visible above the ridge line but fails to provide the detailed cross-sections from a series of sightlines as defined in this Policy.08 and confirmed as a requirement in the SODC Full Pre-Application Response.</p> <p>The comments of the Urban Design Officer in the SODC Pre-application Report regarding gardens facing the open countryside are very apposite to the proposed design. An outward-facing design for the front of relevant properties would enable provision of a more enclosed rear garden space than in this layout.</p>	

	<p>Evidence must be provided which clearly demonstrates that all properties, but in particular properties 6, 7, 17, 18 and 19 in the proposed design, are not visible from multiple viewpoints as defined in Policy.08 SSR 5.</p> <p>There are several other factors below which further support why a redesign of aspects of the site and a reduction in the number of houses is required before this planning application can be accepted.</p> <p>Removal of dwellings that are proposed towards the higher parts of the site, (above the 65m AOD) and redesign of the site with less houses would facilitate conformance with the requirements specified in the NP.</p> <p><b>The planning application in its present form should be refused. The proposed density and design on this site at the edge of the village and in the AONB is not compliant with the NP.</b></p>	
	<p>1. At least 35 of the new dwellings will be 1, 2 or 3 bedrooms.</p> <p>2. If there is to be development on the triangle of land adjacent to Wallingford Road, it shall be no more than a line of 4 houses, set back from the Wallingford Road along an extrapolation of the existing building line on that side of the road, and of similar design to the existing adjacent houses and the houses opposite.</p>	<p>Y</p> <p>Comments to the left still apply.</p> <p>?</p> <p>This triangle of land has been excluded from this planning application. In the NP, it was deemed suitable for up to 4 houses. The planning provisions and mitigation requirements in this NP policy should still apply even if this parcel of land is made available for development at a later date.</p> <p>The comments below apply to SSR 15 and 16 below, as well as the triangle.</p>
	<p>Confirmed in the planning application.</p>	<p>Y</p> <p>?</p> <p>The applicant has stated that they cannot be expected to have management responsibility over land outside their ownership. This statement misses the point of GPC's objection. The whole of the original site was a single entity assessed by the NP and included in the Made plan. There are significant interdependencies between the various parts of the site. If the missing two parts (triangle and manege area) of the original site are proposed in the future for Infill</p>

Roof lines should be kept as low as practicable and no higher than the height of the adjacent house such that they appear to drop down with the topography.	<p>By excluding two areas of the originally allocated GNP6 site from this proposal (the manège and the 'triangle') whilst still benefiting from the overall GNP6 site allocation, the planning application needs to make provision to ensure that all the mitigation requirements and planning obligations for the original whole site will be delivered in the future. These include:</p> <ol style="list-style-type: none"> <li>1. The commitment to 40% affordable housing across the whole site. SODC Core Strategy Policy CSH3 Affordable Housing requires 40% affordable on sites of 3+ dwellings, subject to viability,</li> <li>2. The obligation to protect and conserve the heritage orchard, removal of buildings and incorporating the space into the orchard, planting a native species hedgerow around the boundary and creating a community orchard in line with SSR16.</li> </ol>	<p>then it is important that the policies of the NP regarding the overall site (eg percentage of affordable housing) should also apply to these two specific parts of the original site. There will be costs associated with this that need to be provisioned as part of this larger consideration to ensure that they are shared equitably.</p> <p><b>GPC requests that SODC take the comments on the left into account when considering this application.</b></p>
		<p>By excluding the heritage orchard from the planning application, the developer has assumed that he does not have an obligation to protect and conserve it and to create a community orchard, although Policy.08, SSR16 required this commitment as mitigation for development of the whole site.</p> <p>SODC must take this into account when considering this application and should</p>

	<p>include a planning condition to ensure that the site-specific requirements in Policy.08 in respect to these areas are met in full and that a funding mechanism is available, such as the application of an S106 levy, to ensure that the burden of financing any necessary works falls fairly and equitably between the owners of these two areas and the developer for the proposed application. Otherwise the proposer of this application will financially benefit from building a large number of dwellings without contributing to the cost of complying with the site-specific requirements. The obligation to comply and burden of complying falls collectively on anyone and all who develop the allocated site.</p>	
	<p>Any planning permission should include the aspects of this requirement that can still be achieved on the proposed site. As the proposed development site shares a boundary to the west with the traditional orchard, the developer can enhance this immediately by planting a native species hedgerow along this boundary as required by SSR14.</p>	<p>In relation to SSR3a the Travel Plan document (3.2.2) states, incorrectly, that there is a footway on the north side of Springhill Road. In fact, the footway is on the south side of the road. Pedestrians and cyclists leaving or entering the site on the north side of the road will be protected by a barrier but this alone is inadequate to enable safe crossing.</p>
3. Public access across the site will be enhanced with pedestrian and cycle access to Springhill Road and Wallingford Road, connected by safe pedestrian routes and cycleways, which run through the site. This will include:	N	<p>Comments to the left still apply.</p> <p><b>GPC requests that the detailed comments from MIGGS should be taken into account.</b></p> <p>GPC notes that the design of the path connection to Springhill Rd has been widened and improved but that it does not include any levelling off or rest points. Only</p>

<p>a. provision of a safe new public footpath (suitable for self-propelled wheelchair access) and cycle access connecting the south east of the site to Springhill Road, with suitable mitigation to protect the privacy of existing properties bordering the pathway and to ensure a safe entrance and egress for cyclists and for pedestrians to cross to and from the pavement on the southern side of Springhill Road;</p> <p>b. retention of the existing permissive footpath to the north of the site linking Wallingford Road and Icknield Road;</p> <p>c. provision of a safe public footpath and cycle path connecting</p> <p>d. a) and b) above with the access junction at Wallingford Road.</p>	<p>There is local concern that, because there is no pavement on the north side of Springhill Road and there are frequently parked cars on the south side of the road, that cycle and pedestrian access onto Springhill Road is unsafe. Visibility up and down Springhill Road will be limited; there are no splays or pedestrian pavements shown in the plans.</p> <p>This pedestrian and cycle route will be used by children going to / from school and the playgrounds (GNP6 LEAP and Bourdillon). It also needs to be wheelchair accessible.</p>	<p>limited plans have been presented to ensure safety of the junction at Springhill Rd for pedestrian and cyclists and</p> <p><b>As discussed elsewhere, GPC requests that SODC ensures that sufficient consideration is given to:</b></p> <ul style="list-style-type: none"> <li>- ensuring that a safe and suitable cycle path, pedestrian pathway, entrance, exit and road crossing to Springhill Rd is committed to before approving this application. Note that visibility along Springhill Rd from the junction of this pathway will be severely limited by parked cars. It will be used as the main through-way from the site to the nearby school, convenience store, railway station and village centre. Springhill Rd is also a route for fire engines from the nearby fire station and by buses. OCC should give full consideration to provision of safety railings at the end of the pedestrian/cycle path on the northern side of the road and a suitable yellow line and built-out pavement strategy for the south side of the road. Safety at this critical junction is paramount.</li> <li>- a safe and suitable cycle path, pedestrian pathway, entrance, exit and road crossing to Wallingford Rd and between Wallingford Rd and Springhill Rd is committed to before approving this application. Additional traffic calming and a controlled pedestrian crossing may be required on Wallingford Rd given the recorded average speeds reported by the applicant well in excess of the 30mph limit. The Highway Authority should be requested to reconsider its position on this.</li> </ul>
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		<p>- Ensuring the ongoing privacy and security of Nos. 42 and 45 Springhill Rd, either side of the new path.</p> <p>GPC also supports the consultation comments from Going Forward Buses which is a local (not for profit bus) service. It is not clear from this application what provision is being made concerning the bus stop on Wallingford Road close to where the new access road junction will be. Similarly, safe access to the bus service in Springhill Road should be considered. In addition, car parking restrictions should apply so that the bus can stop safely.</p>	
4.	The access road onto Wallingford Road must be sensitively designed to mitigate any unavoidable landscape and visual damage in a manner that reflects the existing character of the road and landscape, whilst complying with road safety requirements, the details to be agreed with the relevant authorities. This will include:	<p><b>Y</b> (but see comments opposite)</p> <p>The Transport Statement, is based on 2016 traffic counts on Wallingford Rd, and models trip generation from 51 dwellings. It concludes that "the impact of the proposed development on Wallingford Road will be small, with a maximum impact of 18 vehicles travelling northbound during the AM peak hour and 14 travelling southbound during the PM peak hour. This equates to 1 vehicle every 3 minutes and will have very little impact on the local highway network."</p> <p>It also states:</p> <ul style="list-style-type: none"> <li>• The site will be accessed via a new simple priority junction on the B4009 Wallingford Road;</li> <li>• The access is proposed some 300m north of the junction with Springhill Road. The site access road will be 6.0m wide with a 2.0m footway on the southern side.</li> <li>• Visibility splays of 2.4m x 73m to the south and 2.4m x 65m to the north</li> </ul>	<p>Comments to the left still apply.</p> <p>Y (but see comments opposite and above)</p> <p>GPC welcomes the key improvements have been proposed in order to soften the impact of the access road and improve its usability and safety for pedestrians and its impact on the AONB landscape.</p> <ul style="list-style-type: none"> <li>-provision of a new hedge to the rear of the required visibility splays which will grow up to provide screening along the Wallingford Road</li> <li>- sinking of the road it into the landscape</li> <li>- an alternative form of retaining structure comprising an earth bank seeded with wildflowers allowing for a natural looking bank along the boundaries of those parts of the access road where retaining structures were previously proposed</li> <li>-wider pavement access with metal railing to separate the footpath from the roadway</li> <li>-pavement access to the bus stop</li> <li>- low level bollard lighting along the access road</li> </ul> <p>A revised Transport Addendum is included with this planning application which outlines other improvements including wider footpaths throughout the development and</p>

<p>proposed access and maintain the character of the rural streetscape;</p> <p>c. design of the access road, to minimise the impact on residents opposite, particularly in terms of light pollution at night and safety in and around the junction;</p> <p>d. a safety review to ensure that the impact of road access onto Wallingford Road is fully considered in terms of traffic passing, entering and leaving the junction, cycle access and pedestrian access including pedestrians with mobility issues and pedestrians walking to and from the site along Wallingford Road.</p>	<ul style="list-style-type: none"> <li>• are demonstrated in accordance with 85%ile speeds recorded on Wallingford Road.</li> <li>• The required visibility is achievable within land owned by the client and highway land.</li> <li>• <b>NOTE:</b> The access appears to be positioned a few meters further north than that proposed in the Origin Traffic Study submitted to the Plan during consultation and the land ‘take’ extends further north along the road, following the new site boundary, to achieve the correct splay and the grading. This might be because the ‘triangle’ land is not included in this proposal.</li> <li>• The B4009 Wallingford Road is a single carriageway road subject to 30mph in the vicinity of the site. However, the 2016 survey showed an average weekday 85%ile speed of 43mph in a northbound direction and 40mph southbound.</li> </ul>	<p>improved parking facilities. The report includes comprehensive traffic modelling and concludes that the development will have only minor impact on traffic capacity of the Wallingford Rd. However, it has not responded to GPC's additional highway loading concerns regarding recent wider developments in this area.</p> <p><b>Detailed comments regarding Springhill Rd and Wallingford Rd have been made above and in Policy 20.</b></p> <p><b>In the case of any planning consent for this site, GPC wishes to ensure the safety and amenity of Springhill Rd residents by requiring that the Wallingford Rd access and service road must be constructed first and used to service all construction traffic.</b></p>
		<p>GPC requests that OCC Highways consider the adequacy of this junction a) to check the engineering requirements and b) to assess the need for traffic calming to slow on the edge of the village.</p> <p>Agreement of detailed technical delivery for the junction will lie with SODC and OCC</p>

	<p>Highways, who must be aware of the requirements for the mitigation of visual impact in line with points SSR4 a-c to the left.</p> <p><b>Note: In the case of any planning consent for this site, GPC wishes to protect the safety and amenity of Springhill Rd residents by requiring the Wallingford Rd access and service road to be constructed first and used to service all construction traffic.</b></p>		<p>Comments to the left still apply.</p> <p>The required series of cross-sections required by the NP and by SODC in the Pre-App report have still not been provided.</p> <p>Policy 08. SSR5 in the Plan states: "Detailed cross sections should be taken along a series of sightlines including but not limited to those shown on the plan (below) to ensure this condition is met."</p>
5. rooftops and screening for houses on the site should not be visible above the ridge line in views from Wallingford Road, particularly from between Spring Farm Barns/Cottages and 91 Wallingford Road but also from the road to the north of the Spring Farm hamlet.	N	<p>Only one cross section showing the crest of the hill has been provided in the Design and Access Statement 3.8. The profile shows how close the roof lines of the highest buildings are to the crest and how vulnerable this sight line is to any future changes eg TV aerials, satellite dishes, fences, trees etc</p> <p>The SSR requires a series of cross-sections from different positions to be provided (see left). This requirement was reiterated by SODC in the Pre-app report required</p> <p>Detailed cross-sections should be taken along a series of sightlines including but not limited to those shown on the plan below to ensure that this condition is met.</p>	

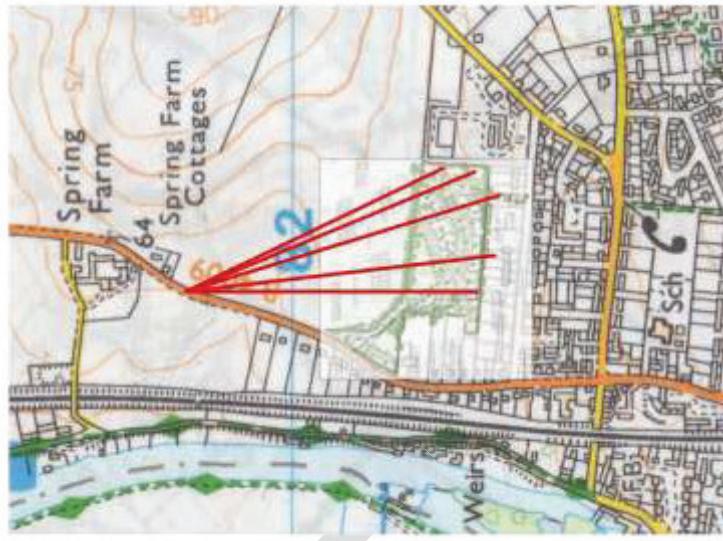


Diagram of detailed sightlines for GNP6

***Views are dynamic and change with position so several cross sections are required as the Bramhill LVA Supplementary Report 1 para 85 comments:***

***"Development proposals should therefore:***

- Be modified to ensure that settlement ridge lines, roofs, chimneys, etc., are not visible above the ridge line in views from Wallingford Road, particularly from between Spring Farm Barns / Cottages and 91 Wallingford Road but also from the road to the north of the Spring Farm***

	<p><i>Hamlet (ie Spring Lane). At this detailed layout stage, localised variations in landform and site layout become critical and the precise boundary of acceptable development may not, therefore, lie along a 5m-interval contour, but may vary dependent on localised topography.</i></p> <p>Achieving this may mean making some adjustment to the housing footprints shown on the current proposals plan but might also be achieved by lowering roof lines of buildings along the northern edge of the proposed development, for example, by some single storey (accessible housing?) and / or by use of dormers for the second storey.</p> <ul style="list-style-type: none"> <li>• Be presented with a series of cross sections to confirm that this can be achieved. These need to be explored at the 'worst case' as well as the 'best case' locations, including section lines from the more elevated sections of the Wallingford Road immediately to the south of Spring Farm Cottages, as well as from the lowest sections of Wallingford Road selected for the current cross sections provided by the developer. Sections should encompass development along the northern boundary and particularly the north-east part of the site where the crest is lower.</li> <li>• The eventual appearance of trees planted along the northern boundary of the site also needs to be considered..... If the curving crest of the ridge could be maintained clear of vegetation, this would maintain the characteristic open land against the horizon, framed with vegetation to the east and west.”</li> </ul>	<p>This current revised planning proposal for GNP6 states again that houses will not be visible above the ridgeline. To quote: “Comments have been made regarding the omission of plot numbers 1-7 due to concerns regarding the potential visibility of these plots. As part of the original submission visibility of the development was shown from the one key vantage point and it is demonstrated that the properties are</p>

	<p><i>not visible. The Design development ensures that plots 1-7 will sit at the same finished floor level and ridge height as the properties on the opposite side of the access road (plots 8-16) and so will be no more visible than those properties.</i></p> <p><i>Furthermore, the viewpoint identified within the GNP sits at approximately 45 metres AOD which is significantly lower than the highest point of the ridge which sits at approximately 74 metres AOD. As such, public views from this viewpoint towards the ridge are in an upwards direction. The dwellings on the application site sit beyond the ridge at a much lower land level (approximately 67m AOD) ensuring there are no views of the dwellings from this viewpoint. “</i></p>	<p>In fact, viewpoints identified by the GNP on Wallingford Rd and Spring Lane sit between 60 and 65m AOD, <u>not 45m AOD</u>, and the north east part of the site mentioned by Bramhill lies at 65-69m AOD <u>not at 74m AOD</u>, the height of the knoll. These viewpoints lie where the skyline is at its most sensitive and where even slight topographical variation of a few metres is critical.</p> <p>The single cross-section provided shows that roof lines of the highest buildings are only a hairsbreadth below the crest. This sightline is very vulnerable to any future changes eg TV aerials, satellite dishes, fences, trees etc. Visibility of any of these would break the ridgeline and be in breach of this Site-specific Requirement.</p> <p><b>GPC does not support a woodland screen to the north of the site, as requested by SODC's Countryside Officer. The woodland boundary proposed would be planted at 71-72m behind the gardens of the northern-most houses. It includes species that mature at between 4m and 12m and would comfortably break the skyline. Within the</b></p>

		<p>development, Pyrus and Whitebeam mature at over 12m. Whitebeam are proposed for the back gardens of the northernmost 7 houses, to be planted at 70m.</p>
		<p>Comments to the left still apply.</p> <p>GPC welcomes the reduction of 2 houses in the south east corner and the removal of the redevelopment of 48 Springhill Rd. These changes around units 39-47 resolve the awkward congestion and un-neighbourliness for residents of Springhill Rd referred to opposite and facilitate an improved footpath and cycle path.</p>
6. The design of new buildings should conform with the provisions of SODC's Design Guide and also the Chilterns Buildings Design Guide to ensure that dwellings will be sympathetically designed and fit in with the local area.	?	<p>The building styles proposed are based on a survey of typical properties from around Goring, illustrated and summarised in the Design and Access Statement. Reflecting the local variety, 14 different house types are proposed for the site giving a mix of roof heights and styles that have potential to be varied and interesting. However, the 1.5 storey design is more in scale and character than the 2-storey design with the village environment and the rural fringe.</p> <p>In the Design and Access Statement, proposed house designs are traditional, relate to local character and will use red brick, steep gables with hanging clay tiles and plain red clay roof tiles. While red brick buildings are traditional in Goring, they commonly have a soft, weathered tone rather than bright red. Bright red modern bricks have a major visual impact, especially in long distance views; for example, Iceni Close's bricks and roofs are starkly 'red' and highly visible from Lough Down. A softer toned multi-stock brick in red/brown/grey/blue shades (eg Ibstock) would be more discrete and would tone in with the landscape more subtly. Use of two or three different brick tones for different units</p>

	<p>would add interest and variety to the development.</p> <p>The exact materials to be used are not specified in the application and, while the Design and Access Statement illustrates some materials on p25, the figures are not titled or explained. <b>A planning condition relating to on-site inspection and approval of materials before work starts would be appropriate for this large and important site.</b></p>	<p>Roofs are of varying ridge height but all have steep pitches; they also have deep eaves and many have traditional dormer windows. Use of high-pitched roofs gables rather than hips for 1 and 2 storey buildings lower down the site could encourage future loft conversions to three storeys with potential for addition of roof dormers and the risk of unneighbourliness to Springhill Rd residents due to the steepness of the site.</p>	<p>Green screening, evergreen where possible, will be important here and must be established early in the development.</p>	<p>Ridge heights are not given and plans are not to scale so it is not possible to assess whether individual units will be safely hidden below the hill crest.</p> <p>Staggering the front alignment of the units where possible could add more interest to the street layout.</p>
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	Gardens of all the properties are very small in comparison to the surrounding area, due to the large number of houses proposed for this restricted site. This is particularly noticeable at the southern edge of the site for units 39-47 where units are awkwardly congested and unneighbourly to each other as well as existing Springhill Rd properties.	
	<p><b>43 Springhill Rd:</b> replacement dwelling is too large for its site. Its exact location and design is unneighbourly in relation to its neighbour and its appearance ungainly; it is out of scale, at right angles to existing properties and out of keeping with other properties in the road. Alteration of the existing property to provide a new drive to its front and access to the rear via the space to the west of the property would allow the current driveway to the east of the property to be re-purposed as a pedestrian and cycleway without demolition. This would eliminate any loss of embodied carbon in the property. If the developer wished to replace the building, a bungalow would be more appropriate. <b>Further consideration must be given by SODC to this specific aspect of the planning application before it is approved.</b></p> <p><i>See also comments on Policy 16 above.</i></p>	<p>?</p> <p>(but see comment opposite)</p> <p>?</p> <p>(but see comments to the left and opposite)</p>
7. The site design must include provision of a secure children's play area, including equipment suitable for 6 – 12-year olds.	A new children's play area (LEAP) is included in the design, but LVA 5.19 says it will be unfenced. SSR7 requires a secure play area.	See comment to the left. The developer states "the play area will be enclosed by more natural forms of enclosure given the sensitive nature of this part of the site".

Provision is to be made for the ongoing maintenance of the space and equipment, for which a management strategy must be provided.	GPC requires that this should be a physically enclosed playground (see comments under Policy 18 point 2) above) and recommends that SODC should make this a planning condition for the acceptance of this or any future application on this site. Also, that servicing and maintenance of this play area is included in the proposed ongoing responsibility of the private management company proposed by the developer (see SSR 12 below).	It is important that this play area must be available for the ongoing use of all residents of Goring, not just the residents of this site.	
8. A Grampian-style condition is imposed, stating that Development will not commence until details are approved of how the developer will ensure the public water supply source is not detrimentally affected by the proposed development, both during and after its construction.	?	There is little comment on this requirement in the planning application at this stage	?
9. A palaeontological assessment must be provided making specific reference	Y	Survey and report submitted	Y

to the discovery of Ichthyosaur bones in the vicinity.			
10. The Oxfordshire Historic Environmental records should be reviewed for any records of archaeological remains.	Y	Survey and report submitted	Y
11. There must be a net gain in biodiversity through the retention of existing features where possible and through appropriate mitigation planting.	Y	Notwithstanding the comments above regarding the crest of the hill, there is evidence in the planning application that this SSR has been considered and the developer has confirmed his commitment to producing evidence that net biodiversity will increase.	Y
Mitigation planting is to consist of native species that are appropriate to the area and reflect local landscape character.  New habitat corridors, in the form of hedgerows and/or tree belts are to be introduced at the site boundaries and throughout the site.			
12. The visual amenity of Springhill Road residents must be protected by providing an appropriate landscape buffer on the southern boundary. This should include, at an early stage of the development, enhanced screening with new trees and hedges to continue and enhance the existing line of vegetation particularly along the south-western edge of the site.	N	The NP requires the gardens of new houses to the south of the site to back onto the gardens of the properties in Springhill Road. This condition is not satisfied by the proposal. The planning application includes 3 houses that are sideways on to the gardens in Springhill Road and in very close proximity. In addition, a road is proposed along the garden boundary of a further six Springhill Road properties instead of back to back gardens.	?
This area should be the subject of a legal agreement to ensure that residents of neighbouring properties		A road and verge are proposed along the screening behind the garden boundary of six Springhill Road properties instead of back to back gardens as specified in this SSR 12. However, GPC recognises that the proposed enhanced screening assists the privacy of these properties and that they are not overlooked.	

<p>are not able to remove, reduce or materially modify the screening. Neighbouring gardens rather than the new houses themselves must lead to the garden edges of Springhill Road properties.</p>	<p>In addition, there is a large copse of trees shown at the back of the garden of the proposed redeveloped house at No.43 Springhill Road which will impact on the garden amenity of No.41.</p> <p><b>As commented elsewhere, non-compliance with this and other NP policies is a direct consequence of the developer trying to cram in too many houses. The application should be rejected and a new design produced that respects the Plan's allocation of 38 dwellings to this part of the original site. This would resolve issues of density, and enable a commitment to SSR12 to protect the amenity and privacy of Springhill Road residents.</b></p>	<p>The removal of two of the planned houses in the south east corner enables larger gardens in the remaining new houses and complies to this SSR.</p> <p>The applicant proposes that the land should be managed by a private management company and that the approval of management plans could be approved through a planning condition of the S106 requirements. <b>To ensure compliance with the NP, GPC requests that this should be included as a condition of acceptance of a planning application.</b></p> <p>This planning condition must also include the ongoing service responsibility for the children's playground facility, street lighting throughout the site, all pavements and road surfaces, hedges and other vegetation, public grass areas (including regular mowing), seats in the link to Springhill Rd and fencing/railings along the access road. It should also include the ongoing maintenance of the open space mentioned in SSR 13 below and all other areas of open space throughout the site.</p>	<p>To ensure compliance with the NP, GPC requests that this should be included as a condition of acceptance of a planning application. In addition, it is important that this area and all other green space through the development must be available for the ongoing use of all residents of Gorring, not just the residents of this site.</p>
<p>13. A new area of at least 0.25ha of Open Green Space must be created to the north of the site.</p> <p>Provision is to be made for the ongoing maintenance of the space, for which a management strategy must be provided.</p>	<p>The planning application exceeds this requirement and commits to a management plan for the ongoing maintenance.</p>	<p><b>Y</b></p>	<p>118 car parking spaces are proposed across the development of these:</p> <ul style="list-style-type: none"> <li>● 96 are allocated to the residential properties adjacent to each dwelling on private driveways and garages.</li> <li>● 22 unallocated spaces will be provided, distributed across the</li> </ul>
<p>14. The developed site must include sufficient parking spaces for the occupants of the dwellings and their visitors so that there is no impact upon the surrounding residential streets, having regard to Local Authority adopted standards.</p>	<p><b>Y</b> (But see comments opposite)</p>	<p><b>Y</b> (But see comments to the left)</p>	

	<ul style="list-style-type: none"> <li>development for casual and visitor parking.</li> <li>Each property will have one EV charging point in line with Policy TRANS5 of the South Oxfordshire Emerging Local Plan.</li> <li>This is in line with Local Plan guidelines but with the required redesign to provide a lower density of houses, there would be more space for additional overflow parking spaces.</li> </ul>	
15. The levels and landform within the manège area (shown in grey in the diagram) must be reprofiled such that they relate to the original and surrounding landform and any housing in this area designed to 'sit down' in the landscape and so as to relate well to the original and surrounding landform.	N	<p>The manège area, with a capacity for 3-4 houses has been excluded from this planning application. The planning provisions and mitigation requirements in this NP policy must still apply even if this parcel of land is proposed for development at a later date. This is discussed in more detail above under Policy.02 and Policy.08 SSR 2.</p>
16. The boundary of the traditional orchard area is shown by the green line in the figure below. No development will be permitted on the site within the area of traditional orchard identified by the red line boundary in the figure.	N	<p>The area in the south west corner of the allocated site, including the orchard area, has been excluded from this planning application. The planning provisions and mitigation requirements in this NP policy should still apply even if this parcel of land is proposed for development at a later date. This is discussed in more detail above under Policy.02 and Policy.08 SSR 2.</p> <p>The proposed development site shares a boundary to the west with the traditional orchard. The developer can still enhance this by planting a native species hedgerow along</p>

	<p>this boundary immediately. This should be a condition relating to any planning consent.</p>
	<p>All surviving viable and veteran orchard trees in this area must be protected and conserved.</p> <p>Plans must be included for the regeneration of the traditional orchard as a community orchard including provision for the ongoing maintenance of the space, for which a management strategy must be provided.</p> <p>The traditional orchard area must be enhanced by planting a native species hedgerow around the boundary.</p>
	<p><i>Figure 39 Diagram of the manège area and traditional orchard for SSR 16</i></p>

The barn and other outbuildings must be removed and this area incorporated into the orchard.

