

WOODCOTE NEIGHBOURHOOD PLAN 2013-2027

EXAMINATION VERSION

A Report to the South Oxfordshire District Council
of the Examination into the
Woodcote Neighbourhood Plan

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1. Introduction

The Neighbourhood Plan

This Report provides the findings of the Examination into the Woodcote Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”

(Paragraph 183, National Planning Policy Framework)

Woodcote Parish Council is the *qualifying body*¹ for leading a neighbourhood plan, in line with the aims of neighbourhood planning, set out in the Localism Act (2011) and recognised in the National Planning Policy Framework (2012).

The Neighbourhood Plan was led by an Advisory Group, made up of 23 local residents, formed further to an extraordinary Parish meeting attended by over 200 residents. The Neighbourhood Plan is a “Front Runner” and as such, is one of the first tranche of neighbourhood plans to come forward in the country.

This Examiner’s Report provides a recommendation as to whether or not the Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by South Oxfordshire District Council. The Plan would then be used to determine planning applications and guide planning decisions in the Woodcote Neighbourhood Area.

Role of the Independent Examiner

I was appointed by South Oxfordshire District Council, with the consent of Woodcote Parish Council, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Plan and I possess appropriate qualifications and experience. I am a chartered town planner and have significant land, planning and development experience, gained across the public, private, partnership and community sectors.

¹The qualifying body is responsible for the production of the Plan.

As Independent Examiner, I must make one of the following recommendations:

- a) that the Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Plan, as modified, should proceed to Referendum;
- c) that the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Woodcote Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Neighbourhood Plan clearly states that it covers the period 2013 to 2027. Consequently, I confirm that the Neighbourhood Plan satisfies this requirement.

Section 1.5 of the Neighbourhood Plan states that the plan will run concurrently with the South Oxfordshire Core Strategy 2027. Further to this, I note that this section also states that Woodcote Parish Council will be responsible for maintaining and periodically revisiting the Neighbourhood Plan, to ensure relevance and to monitor delivery.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to South Oxfordshire District Council that I was satisfied that the Woodcote Neighbourhood Plan could be examined without the need for a Public Hearing.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “Basic Conditions.” These were *set out in law*² following the Localism Act 2011. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan (see Development Plan Status below) for the area.

I have examined the Neighbourhood Plan against the Basic Conditions above.

European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Neighbourhood Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

The Basic Conditions Statement submitted with the Neighbourhood Plan states that there are no sites within the Neighbourhood Area to which European Habitat Regulations apply. South Oxfordshire District Council is satisfied that the Neighbourhood Plan is in general conformity and there are no objections to it in this regard.

The Neighbourhood Plan allocates land for new housing within an Area of Outstanding Natural Beauty. For this reason, a Strategic Environmental Assessment (SEA) was carried out in accordance with the SEA Directive (Directive 2001/42/EC).

A Sustainability Appraisal Scoping Report was produced in August 2012 and a Sustainability Appraisal carried out. This appraised three strategic options for development and evaluated possible sites for allocation in the Neighbourhood Plan. An Additional Policy Appraisal was also undertaken.

² Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

The Scoping Report for the Neighbourhood Plan was submitted for consultation to English Heritage, Natural England and the Department of the Environment. Comments received were generally supportive. However, I note that English Heritage raised concerns that the Neighbourhood Plan afforded a low priority to the conservation and enhancement of the “District’s” historic environment.

In this regard, I am mindful that South Oxfordshire District Council is satisfied that the Neighbourhood Plan meets the Basic Conditions. Together, the South Oxfordshire Core Strategy and the Framework provide policies that recognise the importance of heritage assets to the nation. As such, a suite of policies already provides for the conservation and where appropriate, enhancement of heritage assets within the Neighbourhood Area. Whilst the Neighbourhood Plan does not place an emphasis on the Neighbourhood Area’s heritage assets, there is nothing before me to suggest that its policies would lead to the failure to conserve them, or would prevent their enhancement.

I acknowledge the issues raised by English Heritage and recognise that neighbourhood plans can look to emphasise, or even focus on local heritage. However, for the reasons above, the absence of such a focus in this case does not lead me to conclude that the Neighbourhood Plan does not meet the Basic Conditions.

South Oxfordshire District Council is satisfied that the Sustainability Appraisal meets the requirements of the SEA Directive and there is no substantive evidence before me to demonstrate that this is not the case.

In the absence of any evidence to the contrary, I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998.

Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations and that it does not breach, nor is in any way incompatible with the ECHR.

South Oxfordshire District Council

South Oxfordshire District Council has confirmed that it is satisfied that the Neighbourhood Plan is in general conformity with the policies of the South Oxfordshire Core Strategy, which was adopted in December 2012.

3. Background Documents and Woodcote Neighbourhood Area

Background Documents

In undertaking this examination, I have considered each of the following documents in addition to the Examination Version of the Woodcote Neighbourhood Plan:

- National Planning Policy Framework (The Framework) (2012)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- South Oxfordshire Core Strategy (Adopted 2012)
- Basic Conditions Statement
- Consultation Report
- Basic Conditions Statement Attachment A: Sustainability Assessment
- Equality Assessment

Also:

- Representations received during the publicity period

Further to the above, I spent an unaccompanied day visiting the Woodcote area.

Equality Assessment

I note above that an Equality Assessment has been provided. This document considers participation and inclusion and sets out to nurture a more proactive approach to the promotion of equality and fairness at the heart of public policy. As such, I commend its inclusion as a supporting document.

In seeking to promote fairness and equality of opportunity, I find that the Woodcote Equality Assessment sets a new standard in equality assessment. It provides an excellent example for other plan-makers.

Woodcote Neighbourhood Area

The Woodcote Neighbourhood Area coincides with the Parish of Woodcote. There is a plan showing the Parish Boundary/Neighbourhood Area on page 9 of the Neighbourhood Plan.

Further to an application made by the Parish Council and a consultation period, from 9 December 2011 to 27 January 2012, South Oxfordshire District Council approved the designation of Woodcote Parish as a Neighbourhood Area on 12 April 2012.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

Effective public consultation provides the foundations for a successful neighbourhood plan. A comprehensive and robust approach to public consultation is the best way to ensure that a neighbourhood plan reflects the needs, views and priorities of the local community. It is especially important to neighbourhood planning, as successful consultation creates a sense of public ownership, helps achieve consensus and provides the foundations for a successful 'Yes' vote at Referendum.

As land use plans, the policies of neighbourhood plans will become the basis for planning and development control decisions. Consequently, legislation requires the production of neighbourhood plans to be supported by public consultation. Building effective community engagement into the neighbourhood plan-making process encourages public participation and raises awareness and understanding of the plan's scope and limitations.

Woodcote Neighbourhood Plan Consultation

Woodcote Parish Council has submitted a Consultation Report, in keeping with neighbourhood planning *regulations*³, to South Oxfordshire District Council. This sets out who was consulted and how, together with the outcome of the consultation.

Further to consideration of the Consultation Report, I am satisfied that the requirements for community consultation were comfortably exceeded during the production of the Neighbourhood Plan.

The extraordinary Parish meeting in September 2011, referred to in the Introduction, marked the start of public engagement in the production of the Neighbourhood Plan, with the Advisory Group meeting for the first time at the end of that month. This was followed by various consultation stages, culminating in the formal, publicity stage, six week consultation period which ended on 8 November 2013.

³Neighbourhood Planning (General) Regulations 2012.

It was the stated intention of the Advisory Group to ensure that communication and consultation “played a major role in formulating the Plan.” A communication programme was established to promote awareness, encourage contributions to the Plan and to provide regular updates. I note that the Woodcote Correspondent, read by nearly all residents, carried monthly articles on the Neighbourhood Plan; and that a dedicated website (woodcotendp.org.uk), which allowed for comments, was set up and maintained.

Prior to producing the Pre-Submission version of the Neighbourhood Plan, two all-village surveys were undertaken – one on housing (June 2012) and one on all aspects of life in the village (January 2013); three major public meetings were held (one in March 2012 and two in February 2013); there were two open workshops (July 2012); and there were various meetings with local groups, organisations, landowners, developers and estate agents.

All of the above was also supported by the distribution of an electronic newsletter, with over 200 subscribers, frequent reports from the Advisory Group to the Parish Council, and the significant advertising of all events.

The Pre-Submission Consultation itself was comprehensive. The lead-up to this consultation period included numerous announcements; a presentation; the hand-delivery of a document denoting procedures, followed by the hand-delivery of a 4-page summary Plan and response form, to all households; and copies of the Pre-Submission version being made widely available. Furthermore, around 46 statutory consultees were consulted.

Of particular note is that members of the Advisory Group made themselves available to answer questions, in Woodcote Library, on six separate occasions during the consultation period. I find this to comprise an excellent and highly commendable example of open and transparent community consultation.

This consultation stage resulted in 214 separate responses, with over 500 distinct comments made. These were analysed and the Consultation Report sets out how comments were taken into account. Changes were made to the Neighbourhood Plan, further to an extraordinary meeting of the Parish Council, held in public.

More than 80% of respondents confirmed their satisfaction that the important aspects of living in Woodcote had been identified and around 80% of respondents expressed support for the Pre-Submission version of the Neighbourhood Plan.

The Consultation Report demonstrates that representations made were taken seriously and where it was considered appropriate, the Neighbourhood Plan was amended. I note that, compared to 214 responses at Pre-Submission stage, only 21 responses were received at the final Submission stage. Whilst not conclusive, this suggests to me that consultees, both statutory and non-statutory, were largely satisfied by the consideration given to representations.

Taking all of the above into account, I find that the public consultation undertaken was transparent and widely promoted, with plentiful opportunities for comment. There is plenty of evidence to demonstrate that the policies of the Neighbourhood Plan largely reflect the views of local people and taken together, the consultation undertaken reflects the significant efforts made by all involved to go well beyond the legislative requirements for public consultation.

In considering representations made at the Submission stage, I am conscious that there was no criticism of the consultation undertaken. On the contrary, I noted that the Neighbourhood Plan was praised for:

“an exceptional amount of care and engagement with the whole community.”

It has been demonstrated that consultation was carried out in an open and comprehensive manner from start to finish, with ongoing opportunities for engagement, involvement and feedback. I am satisfied that the consultation process was significant and robust.

5. The Neighbourhood Plan – Introductory Sections

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

- **NB - the Contents Page should be altered to reflect modifications**

The policies of the Neighbourhood Plan is considered against the Basic Conditions in Chapter 6 of this Examiner’s Report. However, I have also considered the introductory sections of the Neighbourhood Plan and make recommendations below which are aimed at making it a clearer and more user-friendly document.

Sections 1 and 2: Background and Process

Section 1 provides a useful and helpful summary of key factors relating to the Neighbourhood Plan and how it fits into the planning system. It also recognises the dynamic nature of planning and establishes responsibility for ensuring the maintenance and relevance of the Neighbourhood Plan.

This Section is clear and no modifications are proposed.

Section 2 sets out the process by which issues that could be addressed by the Neighbourhood Plan were identified and considered. This provides relevant and interesting background information and leads into a summary of the consultation process, highlighting its importance to the Neighbourhood Plan. A brief paragraph then provides further detail on information sources.

As with Section 1, this part of the Neighbourhood Plan is clear and helpful. No modifications are proposed.

Section 3: Goals and Objectives

Section 3 sets out 6 clear Goals to be addressed by the Neighbourhood Plan and supports each of these with a list of Objectives. Whilst these are based on community aspirations further to consultation, I find that the absence of a

supporting or concluding commentary means that this Section appears somewhat in isolation. The Goals and Objectives are integral to the Neighbourhood Plan and this should be fully reflected in how they are presented.

With regards the above, I consider that it would be helpful if Section 3 included reference to how the Goals and Objectives are linked to and/or have influenced the policies in the Neighbourhood Plan. The absence of this explicit reference, connecting Goals and Objectives with policies, does not in itself mean that the Neighbourhood Plan fails to meet the Basic Conditions. However, without it, it is not clear how, or if, the aims of Section 3 fit in with the rest of the Neighbourhood Plan. This is a relatively simple matter to resolve.

- **Section 3 should include a paragraph explaining the link between the Goals and Objectives and the policies of the Neighbourhood Plan.**

Section 4: Woodcote – Our Village

Section 4 provides a user-friendly overview of Woodcote Neighbourhood Area. In this regard, whilst I acknowledge that the Neighbourhood Area reflects the Parish boundary, I consider that, to avoid confusion, it would be helpful if this section either re-iterated this point, or simply referred to the Neighbourhood Area throughout, rather than to the “Parish” and the “Village.”

- **I recommend that references in Section 4 to the “Parish” and “Village” should be changed to the “Neighbourhood Area” or that further clarity is provided as to the Plan’s use of the terms “Parish” and “Neighbourhood Area.”**

Whilst this Section is generally useful, there are a number of points which detract from it. The second paragraph of Section 4 does not make much sense. It adds nothing to the Neighbourhood Plan and for this reason, I recommend its deletion.

- **Delete Section 4 paragraph two, commencing “All the evidence shows...”**
- **Under the heading Location, the phrase “very rural parish area” should be altered to read “Woodcote is a village situated in a rural area.”**
- **The words “The Parish is essentially rural” in the following paragraph comprise repetition and should be deleted. As worded, this paragraph apparently goes on to describe land outside the Neighbourhood Area (‘The Parish...is surrounded by’). Consequently, this paragraph is confusing, it should be amended to add to the description of the Neighbourhood Area, or be clear in describing the setting of the Neighbourhood Area, or be deleted.**

Under the heading Heritage, the second paragraph sets out the views of the Woodcote Conservation Group. This is not a description which fits in with the rest of the beginning of this Section. It reads as a policy but I note that it is not a policy requirement. The paragraph is incongruous in the context of Section 4 and should be deleted.

- **Delete second paragraph under Heritage commencing “The Woodcote Conservation Group speaks for many...”**

Further to the descriptive part of Section 4, the Neighbourhood Plan then leaps straight into policies and then steps back into describing the Neighbourhood Area again. I find this to be an unsatisfactory and confusing approach.

There is no logical reason as to why some of the policies of the Neighbourhood Plan should sit within Section 4 and then others within Section 5. It would make for a more clearly set out and user-friendly document if each group of policies simply sat within its own Section. It is the policies of the Neighbourhood Plan which will shape the future of the Neighbourhood Area and I find that the existing approach fails to appropriately distinguish policies from introductory and background information.

- **Section 4 should focus on relevant background information, including what is currently paragraph 4.3 (Living in the Neighbourhood Area), but excluding paragraph 4.2 Woodcote NDP Policies.**
- **Paragraph 4.2 should form the beginning of a new Section (5) “Neighbourhood Plan Policies.” The explanatory paragraph to this Section also provides an opportunity to strengthen the link with identified Goals and Objectives, as noted above. Effectively, this small table and supporting paragraph would form a Section in its own right. This will provide a very clear break between the introductory sections and the policies of the Neighbourhood Plan and in so doing, will add significantly to clarity.**

The Plan Policy Coding does not relate to the headings for the policies. I find that this introduces unnecessary confusion and significantly reduces the user-friendliness of the document. It would be much clearer if the Policy Coding was simply used to set out each Section of policies. Thus, Section 6 could comprise Community and Well-Being; Section 7 Traffic and Transport, and so on.

The Plan Policy Coding table itself is confusing. Aside from minor editing points - the inconsistent use of capitals and the word “and” – the order of the Coding does not reflect the order of the policies as set out in the Neighbourhood Plan.

- **Edit the Policy Coding table and set out in order of the groups of policies which follow.**

The policy section is the most important part of the Neighbourhood Plan. It provides for the future shape of the Neighbourhood Area. Taking this into account, its

purpose is not to provide “an overview of life in Woodcote today” or to “introduce challenges,” but to provide policies and relevant supporting information.

- **Delete sentence at top of page 11 commencing “This section provides an overview...”**

Taking all of the above into account, the policies of the Neighbourhood Plan would commence with the Community and Well-Being Policies.

I have proposed a number of changes above. These are aimed at being helpful and are intended to make the Neighbourhood Plan a clearer and more user-friendly document.

Notwithstanding the recommendations above, I would like to acknowledge that the Neighbourhood Plan has been written in plain English and is easy to understand. Its overall design and presentation is very clear and well set-out. If the opportunity arises, more photographs and visual interest throughout the document would enhance it further, but this is not an essential requirement. I note that considerable time has clearly been spent in proof-reading the document ahead of its submission and there is a general absence of typographical errors, spelling mistakes or similar.

The following section of this Examiner’s Report considers the policies of the Neighbourhood Plan in detail.

6. The Plan – Neighbourhood Plan Policies

Subject to the recommendations above, the general structure of the policy section of the Neighbourhood Plan is distinctive and it provides an interesting way in which to set out policies and the reasoning behind them.

As a general point, I note that the background to a number of the policies (rather than the policies themselves) contains negative wording, suggesting “dangers” and “threats.” I find this to be an approach which conflicts with the Framework, which itself, is founded on planning for sustainable growth. Consequently, I address this issue whenever it arises and propose appropriate modifications to enable the Neighbourhood Plan to meet the Basic Conditions.

Taken as a whole, I find that the supporting text to the policies generally provides interesting and relevant information. In particular, it helps to demonstrate the community benefits of the policies and provides a direct link to the consultation process. In this way, the approach serves to emphasise the importance the Neighbourhood Plan places on the input of the community during the plan-making process.

I note that the policies themselves simply use the policy coding, eg, “C1” rather than “Policy C1.” This is a matter of preference, although whilst I don’t suggest a modification in this regard, I do consider that adding the word “Policy” may add some clarity and help to denote the status of the policies.

In the light of the above, I do consider it essential that each Section does incorporate the word “Policies” into its heading. Without this, there is little to state that the Neighbourhood Plan contains policies and it is left to the reader to make an assumption.

Head each policy Section “...Policies.” Eg, Community and Well-Being Policies.

Community and Well-Being Policies

This section opens with a policy relating to Green Space and Landscaping. I consider that this policy (C1) is in the wrong section and would be more appropriately placed alongside the Historic Environment policy, in a Section entitled Environment. On the basis of the modification below, I consider that policy under the heading Environment, below.

- **Move policy C1 Green Space and Landscaping to Environment Section**

This Section would thus commence with the sub-title, “Community and Recreational Facilities.” The first bullet point is negatively worded. Furthermore, there is no detailed policy in the Neighbourhood Plan relating to the protection of defined open spaces.

- **Combine the first two bullet points, creating one sentence stating: “*There is strong community support for the safeguarding of important village assets.*”**

Policy C2

Policy C2 seeks to protect Assets of Community Value.

- **Policy C2 should become Policy C1 and the numbering of other policies in this Section should follow on, as appropriate.**
- **For clarity, the wording of the first part of this policy should be altered to state “...or in significant harm to the community value of an *Asset of Community Value* will be strongly resisted.”**

This would ensure that Policy C2 would have regard to the Framework, which requires policies to be clear. The remainder of the wording, as set out, does not form a land use policy, but is a statement of intent and an explanation of what would happen, were the suggested buildings to become Assets of Community Value. Consequently, it should not form part of Policy C2, but provides background information.

- **The second paragraph of Policy C2 should be removed from the policy itself and provide supporting text.**

Policy C3

Policy C3 seeks to promote additional sports facilities at local schools. As set out, the policy would seek to expand sports facilities but prevent the use of artificial surfaces such as AstroTurf. No reason is provided to justify such an approach and there is nothing in the Framework, or in the strategic policies of the development plan which would support such an approach. Furthermore, the approach would appear to conflict with the intent of the policy which seeks additional facilities for the use of the schools and the wider community – something which all-weather surfaces may help to achieve.

It is possible that the intent of the policy is not to prevent the use of AstroTurf, but that the intent of the policy has been fundamentally altered by the use of grammar in its drafting. However, even if this is the case, there is no relevant justification provided to include reference to AstroTurf in the policy itself.

In addition to the above, Policy C3 states that additional sports facilities should only arise without the loss of areas of open space. However, there is no clear indication that additional facilities could be provided by utilising anything other than existing open space. Taking this and the above into account, I find that Policy C3 is so confusingly worded as to fail to provide the clarity required to meet the Basic Conditions. However, on the basis that I understand the aim of Policy C3, I suggest the modification set out below.

- **Re-word Policy C3: *“Proposals which provide for additional sports facilities, open in character and over and above those which already exist, on the Langtree Academy and Woodcote Primary School sites, and which meet the requirements of the school and the wider community, will be encouraged.”***

Policy C4

Policy C4 relates to the existing Dispensing Pharmacy at Woodcote Surgery. I acknowledge that the dispensary is recognised as contributing to the medical practice and village. However, this comprises information, rather than a land use policy and should not form part of the policy itself.

The second sentence in Policy C4 states that any proposal requiring planning permission that would lead, directly or indirectly, to the loss of the dispensary will be resisted. The supporting text implies that the policy is intended to prevent permission being granted for a separate chemist with a dispensary. However, the policy itself does not state this. Even if it did, it may well be that a separate chemist

with a dispensary could comprise sustainable development, which itself should not be prevented.

Policy C4 is negatively worded and no parameters are set out to define how *any proposal requiring planning permission* would be assessed to determine whether it would lead directly, or indirectly to the possible future “loss” (or replacement elsewhere) of the dispensary.

Consequently, whilst I can understand and empathise with the intent of the policy – to safeguard a valued service - I am not satisfied that this is a policy that could be satisfactorily implemented and there is no substantive evidence before me to lead me to any other conclusion. I find that Policy C4 would fail to contribute to the achievement of sustainable development. In this way, it does not meet the Basic Conditions.

- **Delete Policy C4**

Policy C5

Whilst entitled “Broadband – fibre to the premises” Policy C5 relates to the provision of Broadband alongside wider communications issues and in particular, telecommunications infrastructure. South Oxfordshire Core Strategy Policy CSEM1 supports the development of the digital economy and the roll-out of high speed broadband across the District.

- **Change the title of Policy C5 to “*Communications Infrastructure*”**

The policy states that proposals for an additional mast will be strongly resisted and that the existing mast at Greenmore should be utilised, keeping other installations to a minimum. The policy goes on to state that the expansion of networks, broadband and improved connectivity will be supported so long as it does not harm the character and appearance of the AONB.

I find that, as well as being negatively worded, Policy C5 fails to have regard to that part of the Framework which prevents the imposition of a ban on new telecommunications equipment. National policy is very clear in pointing out that advanced, high quality communications infrastructure is essential for sustainable economic growth and enhancing local community facilities and services. There is a requirement for operators to keep the numbers of telecommunications masts to a minimum, consistent with the efficient operation of the network.

Taking the above into account, I find that, as worded, Policy C5 would not meet the Basic Conditions. Furthermore, whilst I acknowledge the intent of Policy C5 with respect to seeking to protect the AONB, there may be some circumstances whereby limited harm is outweighed by other factors.

In order for it to meet the Basic Conditions, I propose the following modifications to the first paragraph of Policy C5:

- ***“...will be supported where the applicant has fully explored the opportunities to erect apparatus on existing buildings, masts, or other structures; where the numbers of radio and telecommunications masts are kept to a minimum consistent with the efficient operation of the network; and where the development has been sited and designed to minimise impacts on the character and appearance of the AONB...”***

The second paragraph of Policy C5 states that applications for development must contain a Connectivity Statement and provide for suitable ducting for a fibre connection. There is no definition of what a Connectivity Statement should comprise and as worded, it would be required for minor and irrelevant applications. I find that, in this regard and in line with the existing supporting information, the Policy should be reworded to state that:

- ***“Applications for residential development...”***

and that the supporting text should state:

- ***“A Connectivity Statement should demonstrate how the proposal takes communications connectivity into account.”***

The above approach would not be unduly onerous, but would ensure that connectivity is considered by relevant proposals.

Policy C6

Policy C6 supports the development of additional services and facilities in the village, subject to consideration of highway safety and neighbour amenity matters. South Oxfordshire Core Strategy Policy SCT1 supports proposals that would safeguard and enhance the role and function of larger village centres. Policy C6 is in general conformity with this and has regard to the Framework, which promotes the development of local services and community facilities in villages. It will contribute to the achievement of sustainable development and meets the Basic Conditions.

The final part of the Community and Well-Being Section of the Neighbourhood Plan goes on to consider education. This Section does not contain any policies. As the local education authority, Oxfordshire County Council has noted a factual inaccuracy in the wording of this part of the Neighbourhood Plan and I suggest that the following modification is made:

- ***Paragraph 4.3.6 to be amended to read “Woodcote Primary School has a current enrolment of around 180 and an overall capacity of 210 pupils.”***

Should any expansion be required and/or possible, then new development would be expected to contribute to new school places.”

The Neighbourhood Plan then goes on to consider Traffic and Transport.

- **As noted above, this should form a new Section, entitled Traffic and Transport Policies.**

Traffic and Transport Policies

This Section recognises local concerns with traffic congestion in Woodcote, where car ownership is 50% higher than the national average. The Neighbourhood Plan introduces a series of policies largely aimed at addressing these concerns.

Traffic congestion, especially where car ownership levels are higher than average, is not an unusual problem for plan-makers to take into account. Whilst the Framework is clear in promoting sustainable forms of transport and in seeking the reduction of harmful emissions, it also recognises that car journeys are often necessary, particularly in rural areas.

South Oxfordshire Core Strategy Policies CSM1 and CSM2 support traffic management and other measures which would increase highway safety and require proposals for new development which have transport implications to provide a transport assessment.

In the light of the above, the Neighbourhood Plan Advisory Group issued a statement, within the Consultation Report, to explain the approach with regards Reading Road – a main route through Woodcote, along which schools, community facilities and local employers are located. This provides some helpful background. In particular, it recognises that whilst it can seek to introduce policies that recognise and try to avoid a worsening of the situation, the Neighbourhood Plan itself cannot deliver highways solutions.

This has had a particular bearing on the allocation of land for housing. I note that five potential housing sites along Reading Road were considered during consultation. Of these, only two were ultimately allocated, the others being considered to have too great a negative impact on Reading Road. The Advisory Group points out – and there is no evidence to suggest otherwise – that the decision not to allocate three of the five sites was reflective of villager’s views.

It is evident that much consideration was given to housing along Reading Road and I note that, given the strong support for the two allocations in this location, that the approach reflects the overall view of the community. I am also mindful, in this regard, that one of the allocations is in a use which gives rise to significant vehicles

movements and it is anticipated that these will reduce following redevelopment to housing.

There are a number of objections to the Neighbourhood Plan with regards the non-allocation of land to the east of Church Farm, north of Reading Road. Whilst objectors consider that this site has potential to address some of the congestion-related issues affecting Reading Road, I note that, further to public consultation, the site was considered to be too close to a congestion hot spot and that there was “overwhelming support” for its rejection. The Framework provides communities with the power to establish their own policies to shape development and there is evidence to demonstrate that the proposal does not meet the requirements of the community.

Policy T1

Policy T1 reflects the aim to address the impacts of local traffic congestion with particular regard to the avoidance of conflict and resultant harm to highway safety. Policy T1 has regard to the Framework and contributes to the achievement of sustainable development. It meets the Basic Conditions.

Policy T2

Policy T2 states that applications for development on Reading Road should demonstrate that they will reduce the number of vehicles taking direct access from that road between its two busiest points.

There are a number of objections to Policy T2 on the basis that it would stifle growth. As pointed out above, the Framework supports the retention and development of new services and facilities in rural villages and I find that there is conflict between the Framework and Policy T2 in this regard. Furthermore, there is little substantive evidence to demonstrate how, or if, Policy T2 could work in practice and I find that this adds to my conclusion that the policy does not have regard to national policy.

It is also unclear as to how Policy T2 will contribute to the achievement of sustainable development. In the absence of any evidence, I am not convinced that simple adherence to Policy T2 would promote sustainable development – it is not unreasonable to consider that a slight increase in vehicles “taking direct access from Reading Road” in this location could be directly linked to a sustainable development which may bring other benefits that would outweigh the impacts of such an increase.

Taking all of the above into account, there is nothing before me to demonstrate that Policy T2 meets the Basic Conditions.

- **Delete Policy T2**

Policies T3, T4 and T5

Together, these policies support proposals which would provide for off-street parking spaces, provide a convenient bus lay-by and improve pedestrian safety. They provide for enhanced highway safety and meet the Basic Conditions.

Policies T6, T7 and T8

Together, these policies promote highway safety and meet the Basic Conditions.

Policy T9

This policy requires new homes to provide for at least one off-street parking space for each bedroom. I acknowledge that the purpose of Policy T9 is to prevent excessive on-street parking resulting from new development and that, in a rural village like Woodcote, where car ownership levels are high, there is a need to provide for sufficient off-street parking spaces.

However, as worded, the proposal would conflict with strategic policy requirements as set out in Oxfordshire County Council's residential parking standards. It would, for example, require four bedroomed houses to provide for **no less than** four parking spaces. In determining car parking standards, the Framework requires the type and mix of housing to be taken into account, along with accessibility, local car ownership levels and the overall need to reduce the use of high-emission vehicles.

To allow for Policy T9 to meet the Basic Conditions, I propose the following modification:

- **Policy T9 should read: *"Proposals for all new homes to be built in Woodcote should provide for one off-street parking space for each bedroom, unless otherwise justified having regard to site-specific circumstances and Oxfordshire County Council parking standards."***

Policy T10

Policy T10 requires the "provision for providing" bus lay-bys in association with proposals for development at Chiltern Rise Cottage. In addition to the unwieldy wording of Policy T10, I note concerns raised by Oxfordshire County Council with regards both the cost of bus lay-bys and their effectiveness in addressing congestion, or improving traffic flow.

There is no evidence to demonstrate that, as worded, Policy T10 would result in the delivery of bus lay-bys, or that such lay-bys would contribute towards the achievement of sustainable development. Consequently, Policy T10, as worded, would fail to meet the Basic Conditions.

- **Re-word Policy T10: “...Cottage must include *appropriate road layout changes to ensure that bus stopping areas are provided which do not impede general traffic flow.*”**

Employment and Local Economy Policies

Two small changes to the background information are proposed.

- **The first bullet point is not addressed by this Section of the Neighbourhood Plan and should be deleted. In the opening paragraph, Woodcote residents are not “more qualified than those of England as a whole” but, proportionately, have “more qualifications.”**

Policy EM1

Policy EM1 supports the re-use of a former coal yard for non-residential development. This is a positive policy that supports economic growth. It is in general conformity with South Oxfordshire Core Strategy Policy CSEM2 and it meets the Basic Conditions.

Policy EM2

Policy EM2 requires proposals for industrial, or distribution and storage use, to provide a Transport Statement to demonstrate that there will be no unacceptable impact in the village resulting from HGV traffic. Policy EM2 ensures the early consideration of impacts on the local highway network, with specific consideration to local concerns. It meets the Basic Conditions.

Environment Policies

Policy C1

- **Policy C1 to become Policy E1**

This policy is more appropriately located in the Environment Section. The negative bullet point and introductory text to the policy should be shortened to simply read:

- **The openness of the village and its location in the Chilterns AONB are greatly valued by all who live in Woodcote and residents wish to preserve the rural look and feel of the village.**

Policy C1 requires a landscape strategy to be submitted “when appropriate” with **all** new development proposals. This is both vague and onerous and fails to comply with national and strategy requirements for policies to be clear and implementable and for supporting material to be proportionate. The detailed requirements of the policy clearly relate to larger development proposals. Consequently, the following modification is proposed:

- ***“For the allocations in this Plan, and for other proposals of a similar size, or any major applications as defined by District-wide policies, a landscape strategy shall be submitted which will incorporate...”***

Subject to the above, Policy C1 will ensure that landscaping is integrated into larger developments and will contribute towards the achievement of sustainable development. South Oxfordshire Core Strategy Policy CSEN1 seeks to protect the District’s distinct landscape character and affords high priority to conservation and enhancement of the Chilterns AONB. In this regard, Policy C1 is in general conformity with Policy CSEN1. It meets the Basic Conditions.

Policy HE1

- **Policy HE1 to become Policy E2**

Policy HE1 has regard to national policy and to South Oxfordshire Core Strategy Policy CSEN3, which states that designated historic assets will be conserved and enhanced. It is supported and welcomed by English Heritage. I agree with English Heritage's comment that a list of non-designated historic assets may be helpful, but it is not an essential requirement.

Heritage assets are recognised for their importance. Whilst there is no requirement to repeat existing policies in neighbourhood plans, I recognise that this policy serves to emphasise the crucial role of heritage assets. Policy E2 meets the Basic Conditions.

I find that paragraphs 4.3.12 and 4.3.13 appear largely as a list of random thoughts and views. As such, useful information is lost in the presentation.

- **Either delete paragraphs 4.3.12 and 4.3.13, or re-word, positively, as part of an informative introduction to (and within) the Housing Section.**

Housing Policies

Policy H1

Policy H1 states that a minimum of 73 and a maximum of 76 new homes will be built in Woodcote during the Neighbourhood Plan period.

I note that there was collaborative working between the Neighbourhood Plan Advisory Group and South Oxfordshire District Council in order to consider the housing requirement for the Neighbourhood Area. Effective joint working benefits plan-making and is to be welcomed.

With regards the housing numbers proposed in the Neighbourhood Plan, South Oxfordshire District Council states that

“the Woodcote Neighbourhood Plan correctly identifies their figure based on a proportional split of the number (for larger villages, such as Woodcote).”

South Oxfordshire District Council is satisfied that the approach to housing numbers is in general conformity with the South Oxfordshire Core Strategy. I acknowledge this factor.

However, the Framework, in establishing a presumption in favour of sustainable development, states that plans should meet objectively identified needs, with sufficient flexibility to adapt to rapid change. It recognises that sustainable development is about *positive growth*. As worded, Policy H1 would not allow for any residential development, no matter how sustainable, above the maximum figure. As such, it seeks to impose an inflexible and in the light of national policy, an inappropriate approach to sustainable development.

The imposition of a **maximum** figure for housing creates a significant and fundamental conflict with the Framework and means that Policy H1, as worded, does not meet the Basic Conditions. The wording of Policy H1 is such that the Neighbourhood Plan could not progress to Referendum. I recommend the modification below, whereby any reference to a maximum figure is deleted. Any related reference in the supporting text should also be deleted.

- **Policy H1 to read: “Planning permission will be granted for a minimum of 73 new homes to be built in Woodcote...”**

Adopting this approach does not mean that “any development goes” in Woodcote. The policies of the Neighbourhood Plan and those set out nationally and locally would still control development. Furthermore, it does not mean that additional sites would need to be allocated. South Oxfordshire District Council is satisfied that the Neighbourhood Plan allocations provide for sufficient housing to meet the needs arising from the adopted strategic policies of the development plan, and there is no substantive evidence before me to demonstrate that the Basic Conditions are not met in this regard.

Policy H2

Policy H2 promotes a tenure mix leading to a quarter of affordable homes being for shared ownership. The policy goes on to caveat this by stating “unless viability or other local factors show a robust justification for a different mix.” This presents a flexible and well-worded policy and provides for a distinctive, local community-focused approach which contributes towards the achievement of sustainable development. It meets the Basic Conditions.

Policy H3

Policy H3 states support for local residents to be offered local market housing first, prior to general release. It presents developers with a good opportunity to promote their product to local people.

The supporting text to Policy H3 states that it would not be a condition of granting planning permission. Consequently, developers could choose to ignore it. In this regard, I am mindful that the Framework requires policies to provide a clear indication of how a decision maker should react to a development proposal. As such, Policy H3 is not in general conformity with the Framework.

However, the intent of the approach is to provide some initial priority to local residents and I note that there is some developer support for the approach. I therefore recommend the following modification:

- **Remove the policy status of H3 and highlight it in the supporting text of the Neighbourhood Plan in a similar way to the approach to local schools on page 14. In this way, the Neighbourhood Plan can set out its aspiration and provide developers with a good idea of local sentiment.**

Policy H4

Policy H4 requires a minimum of 40% affordable housing on sites for three or more houses. This is in general conformity with South Oxfordshire Core Strategy Policy CSH3 and has regard to the Framework. It meets the Basic Conditions.

Policy H5

Policy H5 requires 20% of new affordable housing to initially be offered to people with a (defined) local connection to the area. This approach affords some precedence to local people, whilst not preventing others from benefiting from the provision of affordable housing. It is distinctive to the Neighbourhood Area, is locally supported and still provides for those people from outside the Neighbourhood Area with housing needs. It contributes towards the achievement of sustainable development and meets the Basic Conditions.

A representation from Woodcote Parish Council suggests that the percentage in Policy H5 be increased to 100% and that the word “initially” be removed. This would fundamentally change Policy H5. It would offer all affordable housing to those who meet stringent local residency requirements, based on how long they have lived in Woodcote, rather than on their housing need. This would fail to recognise the housing needs of other people – some of whom may live in Woodcote, have local connections and/or have greater housing needs than people who may “qualify” on the basis of the proposal. The proposal would introduce an approach that would fail to be sufficiently flexible to take account of changing market conditions over time and as such, would fail to have regard to the Framework.

I am also mindful that the proposal, unlike the existing policy, has not undergone public consultation, but is a suggestion further to consideration of another policy, in another Neighbourhood Plan, elsewhere in England. The fact that another policy exists elsewhere does not, in itself, provide sufficient reason to warrant the proposed change. In this specific regard, there is nothing before me to demonstrate that the social, economic and environmental circumstances relating to the Lynton and Lynmouth Neighbourhood Area are the same as, or similar to, those in Woodcote.

Policy H6

Policy H6 allows for rural exceptions schemes in line with national and local strategic policy. It meets the Basic Conditions.

Policies H7 and H8

The Framework requires policies to plan for the delivery of a wide choice of homes, reflecting trends, needs and local demand. Whilst I acknowledge that Policies H7 and H8 seek to provide for more smaller homes and reflect local opinion, there is little evidence to demonstrate that the approach, as set out in the policies, reflects trends, needs and demand. I find that, as worded, the policies appear insufficiently flexible and raise issues of viability. They have insufficient regard for the Framework. I am also mindful that South Oxfordshire District Council has expressed concerns regarding the inflexibility of and lack of justification for, Policy H8.

To address the above and enable the policies to meet the Basic Conditions, I suggest the following modifications:

- **Add, at the end of both Policy H7 and H8, “...unless viability or other material considerations show a robust justification for a different mix.”**

Policy H9

Policy H9 seeks to prevent extensions which would lead to the addition of an extra bedroom to properties of three bedrooms or less. This would conflict with the Framework, which supports sustainable development. There is no supporting evidence to demonstrate that any extension to a home of three bedrooms or less would not be sustainable. Policy H9 is inflexible and highly restrictive. There is no substantive evidence to demonstrate that it would contribute towards the achievement of economic, social or environmental sustainability. It does not meet the Basic Conditions.

- **Delete Policy H9**

Policy H10

Policy H10 promotes development which meets Lifetime Home standards. This approach has regard to the Framework, is in general conformity with South Oxfordshire Core Strategy Policy CSH4 and contributes to the achievement of sustainable development. It meets the Basic Conditions.

Policies HS1 and HS2, below, relate to Housing and I recommend that they form part of the Housing Section, rather than create a separate “Development Sites” Section.

Policy HS1

Policy HS1 limits new development on any one site to a maximum of 24 new homes. This approach has been tested through consultation and is strongly supported by the local community. It reflects the community's view that larger development sites would be inappropriate to Woodcote.

I am mindful that, given the proposed modifications to Policy H1, Policy HS1 would not unduly restrict development within the Neighbourhood Area by, for example, leading to an overall limit on the total number of houses that could be developed over the Plan period. It has regard to the Framework. It takes into account the characteristics distinctive to Woodcote, including its location within the Chilterns AONB and supports development which would help to sustain its "rural look and feel."

I note that there have been comments to the effect of "there is no evidence that developments of more than 25 dwellings would not be sustainable." However, the test is whether Policy HS1 meets the Basic Conditions, not whether other approaches might be sustainable or not.

Policy HS1 contributes to the achievement of sustainable development and is in general conformity with the strategic policies of the South Oxfordshire Core Strategy, which recognises Woodcote as a larger village, where development is more constrained than in settlements higher up the hierarchy. It meets the Basic Conditions.

Policy HS2

Policy HS2 supports appropriate infill development. It also provides for a balanced mix of housing on infill sites for more than one dwelling. It meets the Basic Conditions.

Design Section

Together, South Oxfordshire Core Strategy Policies CSQ2 and CSQ3 promote good design which responds positively to, and respects the character of, places; and seek to promote sustainable design and construction.

Policy D1

Policy D1 promotes good design and requires proposals to take local character into account. It meets the Basic Conditions.

Policies D2 and D3

Together, these policies promote appropriate lighting solutions and the incorporation of Secure By Design principles. They meet the Basic Conditions.

Community Facilities

It is not an essential requirement, but it may be appropriate to relocate the Community Facilities part of the Neighbourhood Plan, to either the beginning of the Housing Sites Section, or the end of the Community and Well-Being Part of the Plan.

The introductory paragraph to Policy HS3 is useful and well-worded.

Policy HS3

Whilst the aim of Policy HS3 is clear, the policy itself lacks clarity and to some degree, simply provides a reference to an existing Core Strategy policy. However, by tightening the wording of the Policy, it can become clear, meet the Basic Conditions and contribute to the Neighbourhood Plan.

- **Re-word Policy HS3: “Where the need is identified, new development must provide appropriate new facilities and infrastructure onsite and fund or directly deliver offsite facilities as required by the South Oxfordshire Core Strategy Policy CS11 and those identified by Oxfordshire County Council. Development should be phased in tandem with the timely provision of infrastructure to help support sustainable growth.”**

Housing Sites Section

Whilst not a major issue, I find the above title more relevant to this Section than that provided in the Neighbourhood Plan, which could also relate to previous policies.

Policy HS4

Policy HS4 seeks to limit any residential development to allocated sites and infill sites. This conflicts with other policies in the Neighbourhood Plan, for example rural exceptions housing. Furthermore, it comprises an inflexible approach, which fails to have regard to the Framework’s support for sustainable development. Policy HS4 does not meet the Basic Conditions and should be modified to bring it into line with other (modified) policies in the Neighbourhood Plan.

- **Re-word Policy HS4: “Residential allocations are provided in Table 6.i. The development of, up to and including, the number of houses set out in the Table for each site, will be supported.”**

Under 6.2, the last sentence makes an assumption and should be modified as below.

- **Delete “ensures” and replace with “seeks to ensure.”**

Policy HS5

Policy HS5 provides for reserve sites and meets the Basic Conditions. I note that there have been comments to the effect that the second choice Contingency Site would not meet the requirements of Policy HS1. However, the Neighbourhood Plan clearly separates this site from the adjoining allocated site, both in terms of timing and status. In this regard, I am particularly mindful that that Reserve Site 2 is only a second choice Contingency site and may not be required during the plan period.

Policies HS6 to HS12

Together, Policies HS6 to HS12 respond to the particular characteristics and/or sensitivities of the Allocated and Reserve/Contingency Sites. I note that the policies are the subject of a detailed Memoranda of Understanding signed by the landowners and Parish Council. I find this to be an exemplary approach to collaborative working and neighbourhood plan-making. It provides for clarity and allows landowners and the wider community to work together towards a shared aspiration.

With regards the above, South Oxfordshire District Council has commented that the lower case text should be converted to policy text, to give a strong status to the detailed requirements. Given the supporting Memoranda of Understanding, I consider that this would reflect landowner and community approach thus far. In this regard, I note that HS6 to HS12 are policies and there would otherwise be no wording within the policies, so it may be that this is simply a matter of presentation.

- **It should be made clear that the text within HS6 to HS12 is the policy text.**

Policies HS6 to HS12 contribute to the achievement of sustainable development. The policies meet the Basic Conditions.

7, The Plan: Our Village – Our Future

This final Section of the Neighbourhood Plan does not contain any policies, but notes issues and concerns raised during plan-preparation. It identifies those issues of significant concern which cannot be tackled directly by the Neighbourhood Plan, but which the Parish Council do not wish to lose sight of.

Consequently, Section 7, whilst recognising that the Neighbourhood Plan's policies are limited to land use planning matters, provides a useful marker for important issues and identifies/proposes ways in which they might be addressed.

8. Summary

The Woodcote Neighbourhood Plan is the result of an enormous community effort. It contains some exemplary approaches to neighbourhood planning. I find the following words, taken from one of the representations to the final consultation stage, to provide a fitting tribute to all those involved in the Neighbourhood Plan's production:

"Having attended the open meetings...We commend the thoughtful evaluation carried out by the team, after collecting detailed information and viewpoints. We are most fortunate to have had such a dedicated and clear-sighted team."

I have recommended various modifications to the Plan. Each of these are intended to ensure that the Plan meets the Basic Conditions and/or comprises a user-friendly document.

Subject to the above, the Woodcote Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

In this way, the Woodcote Neighbourhood Plan meets the Basic Conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

I recommend to South Oxfordshire District Council that, subject to the modifications proposed, the **Woodcote Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area - I am required to consider whether the Referendum Area should be extended beyond the Woodcote Neighbourhood Area. The Neighbourhood Area mirrors the Parish boundary. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Woodcote Neighbourhood Area as approved by South Oxfordshire District Council on 12 April 2012.

Nigel McGurk, December 2013
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