

**Q1** *Has the plan-making process had regard to paragraphs 183 and 184 of the NPPF? In particular has the qualifying body been inclusive and open in the preparation of the submitted neighbourhood plan? Has it ensured that the wider community is kept fully informed of what is being proposed and is able to make their views known throughout the process?*

1. The Warborough Parish Council (WPC), qualifying body for the NP, gave every parishioner the opportunity to offer themselves as members of the Steering Committee to guide the NP; no offer of assistance was refused. In particular, steps were taken to ensure that it was both inclusive and representative, and followed best practise, throughout<sup>1</sup>.
2. Engagement with the community is detailed in the WSNP Consultation Statement (CS). The WSNP has striven to ensure that every member of the village has been kept informed and has been able to provide their views<sup>2</sup>, by exceeding statutory requirements and what would reasonably be expected to be proportional. Advisors have commented *'we are impressed with the attention to detail and openness in the consultation process, the multiple opportunities for public consultation across the period of the NP, and the objectivity with which the steering committee recorded and responded to a level of comment and response which far outstripped anything we have experienced (then and now) with other NP groups we have supported. The iterative back and fore process, regularly seeking opinion, ensured that emerging ideas were refined in response to community comment.'*<sup>3</sup>
3. Challenges around communication, transparency and WPC governance have been carefully considered and informed process<sup>4</sup>.
4. Positive responses from both consultations indicate that the majority of parishioners are fully informed of what is being proposed and satisfied that the process has been carried out fairly and with the result<sup>5</sup>. Some responses refute those within NP documentation. We stand by all statements within our documentation. We would be delighted to respond to any questions that the examiner might have in relation to any specific concerns.
5. The WSNP accept that not everyone will agree with all aspects of the plan. We respect the position of those who disagree. We have taken very difficult decisions for the benefit of the whole community, who ultimately have an opportunity to express their opinion at referendum.
6. The WSNP reflects policies in the last version of the local plan and plans positively to support them (NPPF 184). Importantly, development proposed is deliverable and robustly meets the minimum 5% proposed target, with 7% delivered via a site which has planning permission. In addition to infill (now at 2%)<sup>6</sup>, this demonstrates the Parish's ability to meet the development challenge and should, despite the uncertainty in the Local Plan, remain resilient against any challenges.

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<sup>1</sup> WSNP Consultation Statement Q1 *Steering Committee representation of the village* pp108-109

<sup>2</sup> WSNP Consultation Statement *Consultation & Engagement* pp4-16

<sup>3</sup> Tom McCulloch, Community First Oxfordshire (CFO)

<sup>4</sup> Eg Warborough Parish Council Minutes and WSNP Communication Statement Q3 pp 110-111

<sup>5</sup> WSNP Consultation Statement *Pre-submission consultation* pp 17-19 and p 24

<sup>6</sup> WS NP pp 18-30 and WS SAR 6.4 *Selection of Preferred Growth Alternative* pp 44-47

**Q2 Has the qualifying body provided opportunities for the community to be actively involved in shaping the emerging neighbourhood plan and has it made the community aware of how their views have informed the neighbourhood plan (paragraph 47 of Planning Practice Guidance (ID: 41-047-20140306))?**

7. The WSNP has been developed through extensive consultation with the community; extensive guidance on community involvement has been sought throughout, from specialist advisors<sup>7</sup> and SODC to ensure that the consultation process was fully compliant with paragraph 47 of Planning Practice Guidance. An independent examiner health check observed: “... *The Consultation Statement provides evidence of open, transparent and pro-active public engagement, with plentiful opportunities for comment. The Consultation Report makes it clear that comments received were duly considered, whether agreed with or not.*”
8. The emerging NP was shaped iteratively. At each stage residents had the opportunity to participate and/or present their views, which were used to inform the NP<sup>8</sup>. Hundreds of residents were able to attend the eight village events<sup>9</sup>. Over 200 community and land owner engagements were undertaken<sup>10</sup> including for example: over a dozen communications delivered to every household, use of a website for information and minutes of steering group meetings, Facebook and the village email to reach a wide audience<sup>11</sup> and responses to requests from residents adjacent to the allocated site<sup>12</sup>. Notices for meetings and statutory consultations were placed on local notice boards. Feedback has been actively sought and accepted via a variety of media including handwritten or electronic submissions.
9. The WSNP drew on experts within the community to provide local evidence eg a school parent survey, a hedge survey and a school parking survey (on the Parish [website](#)).
10. Statutory pre-submission consultation included the NP and Sustainability Appraisal Review and ran for 8 weeks in the summer of 2017. The approach used to analyse, consider and respond to the 775 pages of residents’ responses, agreed with SODC and CFO as rigorous and proportionate, was to organise them by themes<sup>13</sup>. These themes were summarised, along with actions and the community have been made aware of how their views have informed the emerging NP<sup>14</sup>. Submission consultation ran for 6 weeks from the end of January 2018. Hard copies for both were provided locally in addition to online access.
11. Submission consultation feedback shows 80% of responding residents support the plan, which is consistent with pre-submission indicators<sup>15</sup>.

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<sup>7</sup> Community First Oxfordshire (project oversight), Nigel McGurk (health check), David Potter (site assessment)

<sup>8</sup> WSNP Consultation Statement *Consultation & Engagement* pp4-16

<sup>9</sup> WSNP Consultation Statement highlighted green in the table starting on p 29

<sup>10</sup> WSNP Consultation Statement pp29-39

<sup>11</sup> WSNP Consultation Statement pp 48 – 60.

<sup>12</sup> WSNP Consultation Statement row 2 p 36

<sup>13</sup> WSNP Consultation Statement pp 17-18

<sup>14</sup> WSNP Consultation Statement pp 25-27

<sup>15</sup> WSNP Consultation Statement p 24 *III Resident submissions*

**Q3 Has the site selection process been robust and evidence-based?**

12. During the initial stages, it was logical and reasonable to undertake an assessment of potential development sites to further inform the split opinion in the community survey regarding 'where would you like to see housing provision in the Parish?'<sup>16</sup> By assessing these sites, the NP steering committee (SC) was also undertaking due diligence, considering that pressures on the SODC Local Plan and the need to plan for deliverable development.
13. The SC was very aware that a site assessment process would come under close scrutiny. External advisors have commented positively on the group's sense of responsibility in this regard and the lengths it went to in: 1- taking advice from multiple sources, including SODC and external advisors regarding site assessment criteria and process; 2- ensuring deliberations were clearly recorded and subject to ongoing discussion and testing (using advanced data analysis) both within the committee and via community consultation and; 3- being informed by minuted, ongoing discussion with landowners.
14. The SC produced a sustainability assessment scoping report which set out a framework for testing the plan's objectives, policies and reasonable alternatives. This was consulted upon following SODC guidance in January 2017 and informed the final version and subsequent Sustainability Appraisal Report (SAR)<sup>17</sup>. The SAR was developed and further refined in response to comment from SODC, AECOM and a planning consultant, and then included in the pre-submission consultation and response process<sup>18</sup>. Two spatial planning alternatives were considered<sup>19</sup> and tested against sustainability criteria<sup>20</sup>: (a) infill only and (b) infill plus site allocation:
- **Infill:** At the time of pre-submission consultation, the net gain over 20 years from infill was 1.5% with multiple failed applications (some on potential infill sites submitted); this has now risen to 2%. However, future yield remains uncertain<sup>21</sup>. This gives weight to considering option (b)<sup>22</sup>.
  - **Sites:** All available development sites<sup>23</sup> were subject to a Sustainability Assessment, including a rigorous Technical Site Assessment<sup>24</sup>, informed through careful consideration of all evidence submitted<sup>25</sup>. Where potential concerns were identified, the SC were consistent in requesting landowners to supply additional information and to identify mitigation strategies backed by independent reports where appropriate. The level of engagement of landowners in providing this information varied greatly, and this is reflected in the levels of detail in some assessments, and levels of uncertainty remaining in others<sup>26</sup>.

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<sup>16</sup> WS NP *Development Context* p 8 and Consultation Statement Q2 pp 110 para 1&2

<sup>17</sup> WSNP Consultation Statement 5.8.1 *SASR Comments and responses* pp 62-93

<sup>18</sup> WSNP Consultation Statement p 22-23

<sup>19</sup> WSNP SAR *Summary of Assessment Findings* p 5-7 and 6.2 *Identification of Alternative Policies* p34-36

<sup>20</sup> WSNP SAR 6.3 *Testing of Growth Alternatives* p 37 and NPPF paras 6-10

<sup>21</sup> WSNP NP pp 18-20 and WSNP SAR 6.4 *Selection of Preferred Growth Alternative* pp 44-47

<sup>22</sup> WSNP Consultation Statement p 114 Q9

<sup>23</sup> WSNP SAR Appendix 2 *TSA Site Inventory* p 3

<sup>24</sup> WSNP SAR Appendix 2 *TSA Process and Timeline* p 4-8

<sup>25</sup> WSNP SAR Appendix 2 *TSA* p 5-9 and WSNP Consultation Statement pp 8-16, Q4 *Site Assessment Process* pp 111/112, Q6 *Sustainability Appraisal Report* p 113

<sup>26</sup> WSNP Consultation Statement Q5 *Site Assessment Conclusion* p 113

**Q4 Will the development of the site contribute towards the achievement of sustainable development in the neighbourhood area?**

15. The information gathered by the SC and submitted by landowners was subject to consistent analysis. This revealed that the Six Acres site performed better than all other sites, comparatively, in sustainability testing (encompassing and balancing economic, social and environmental dimensions), in technical assessment and its capacity to deliver, in conjunction with infill, the housing numbers envisaged in the last version of the Local Plan. This is documented in the WSNP SAR and the SC stand by this judgement today<sup>27</sup>. Given the current delays in the Local Plan, this robust approach to development is even more imperative.

**Q5 Has the proposed allocation of the site properly taken account of heritage assets?**

16. The SC acknowledge they are not heritage experts and were aware of sensitivities and therefore sought to harness generations of local knowledge and skills of experts in this area as well as consulting extensively.

17. Additionally, as advised, the SC used the 12-month parallel planning application on the 6 Acres site, including a wealth of knowledge gleaned from independent reports and statutory consultees<sup>28</sup>, to further inform the treatment of heritage assets within the Neighbourhood Plan and SAR<sup>29</sup>.

18. The Consultation Statement responds to issues raised in relation to heritage during the pre-submission consultation<sup>30</sup> and it remains relevant now<sup>31</sup>.

19. The SAR acknowledged impact to heritage assets<sup>32</sup>, (and added detail in response to consultation and expert opinions<sup>33</sup>), identified appropriate mitigation strategies<sup>34</sup> with significant reference to this in Policy H2<sup>35</sup>.

20. Historic England' response to the amended plan on Six Acres concluded that levels of harm would be low and should be justified by weight of public benefit and this was reflected in the 20/12/17 report from the District's Conservation Officer<sup>36</sup>.

21. In conclusion, the planning application for Six Acres, which aligns to Policy H2, was approved on March 28, 2018. All evidence considered by the NP was also considered by the planning process<sup>37</sup>. The application was considered primarily on its planning merits; only limited weight was given to the NP. It was recommended for approval by the District, the Parish, the County, and unanimously approved by the Planning Committee. 67 residents wrote against the application; 325 residents wrote in support<sup>38</sup>. This is further evidence that this site and scheme is a viable proposal supported by the majority of residents and will achieve sustainable growth.

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<sup>27</sup> WSNP SAR 6.4 *Selection of the Preferred Growth Alternative* pp 44-47 and *Consultation Response 136 Appendix 9*

<sup>28</sup> SODC Planning portal for 6 Acres: [P17/S0241/FUL](#)

<sup>29</sup> WSNP SAR Appendix 2 TSA 6.5.3 *Heritage Statement and Visual Impact* p 91, 6.5.4 *Heritage Assets' Impact Assessment* p 91-92 and *Nexus Report* August 2017

<sup>30</sup> WSNP Consultation Statement Q16 p117

<sup>31</sup> Worledge associates report - March 2017 and [eg Plough Field Conservation Officer report P17/S4437/O](#)

<sup>32</sup> WSNP SAR Appendix 2 TSA *Six Acres Adjacent to heritage Assets* p 46

<sup>33</sup> Eg WSNP Consultation Statement *Sustainability Appraisal Report* Q6 p 113

<sup>34</sup> WSNP SAR *Significant effects and mitigation of WSNP sites – Heritage* p 41-42

<sup>35</sup> WS NP *Policy H2 Allocation of Six Acres* p 25, Policy box, para 1

<sup>36</sup> WSNP SAR Appendix 2 TSA 6.5.2 *Historic England* p 90, and SODC CO report [P17/S0241/FUL](#)

<sup>37</sup> SODC Planning Committee [Planning Officer's report](#), Detail Matters: Historic Impact 6.23-6.40 pp 35-39

<sup>38</sup> SODC Consultation responses 148 and 114