

WOODCOTE NEIGHBOURHOOD PLAN 2013-2035

Consultation Report



NOVEMBER 2021

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Section 1: Introduction

1.1 Background

On the 15th May 2014 the South Oxfordshire District Council (SODC, the Local Planning Authority) formally adopted the Woodcote Neighbourhood Plan 2013-2027 (**WNP1**) following successful examination and the support of more than 90% of the 60% of voters who voted in the Referendum.

In 2016 SODC began work on replacing the then current Local Plan (the Core Strategy 2013-2027) with a new local plan. Following delays, the Local Plan 2013-2033 was withdrawn, amended, resubmitted for examination in 2020 as the South Oxfordshire Local Plan 2013-2035 (**SOLP35**), and adopted on 10th December 2020.

In September 2016 Woodcote Parish Council, the designated body for the Woodcote Neighbourhood Plan, resolved to update WNP1 to reflect the requirements of, and run for the same period as, the emerging updated Local Plan.

On 24th March 2021 Woodcote Parish Council approved the submission of the Woodcote Neighbourhood Plan 2013-2035 (**WNP2**) for formal 'pre-submission' consultation for a minimum of 6 weeks as required by the Localism Act 2011 and the associated Regulations.

In preparing the updated Neighbourhood Plan the Parish Council has tried to go beyond the minimum requirements for community consultation required by law, however, the regulations governing public meetings required greater use of on-line methods.

This Consultation Report:

- summarises the entire consultation history; and
- describes the Regulation 14 (Pre-submission) consultation process, responses, and consequent changes to the Plan.

1.2 Communication and Inclusion

The **pre-submission consultation** supports the requirement that Woodcote Parish Council, the designated body is "inclusive and open" in the preparation of its neighbourhood plan and ensures that the wider community:

- i. is kept fully informed of what is being proposed;
- ii. can make their views known throughout the process;
- iii. has opportunities to be actively involved in shaping the emerging neighbourhood plan; and
- iv. is made aware of how their views have informed the draft neighbourhood plan.

Neighbourhood planning began in Woodcote in September 2011. From the outset the Parish Council was determined that the Plan would reflect the views of those living and working in the Parish and consultation and inclusion formed an early and continuing part of the planning process for the WNP1. This determination to ensure the views of the local community continued to shape the second Neighbourhood Plan was an essential element in the construction of the draft second neighbourhood plan.

The Woodcote Neighbourhood Plan Advisory Group (NPAG)

In 2016 the Parish Council resolved to establish a Neighbourhood Plan Advisory Group. Membership was open to any resident of, or worker within, the Parish. All members had to declare potential conflicts of interest upon joining and were required to exclude themselves from any discussion or decision about which they, or their immediate family, may have any pecuniary or commercial interest.

Inclusion and communication activities included:

i. The Woodcote Correspondent

Announcements, updates and reports on consultation events and outcomes were published in the Woodcote Correspondent a monthly village magazine delivered free to homes in Woodcote and the adjacent hamlets of Exlade Street and Crays Pond. Village surveys indicate that it is read by over 90% of residents¹.

ii. All-village Survey

In January 2017 the community was asked:

- for their views on WNP1 some 32 months after the referendum;
- for information about the housing stock and car ownership;
- to identify any changes to the views expressed during the development for WNP1; and
- to identify new concerns and wishes.

74.5% of the 1044 of household survey forms were completed and returned; and 68.2% of the 2000 individual voter survey forms were completed and returned.

A report on the survey can be found on the Woodcote Parish Council website².

iii. Open Exhibitions and Consultations

- On 13th May 2017 the Advisory Group mounted a public exhibition in Woodcote Village Hall to present the results of the 2017 all-village survey and to further explore the community's views on the housing need and the concerns about climate change, sustainability and biodiversity. Attendees returned 171 questionnaires. A report on the exhibition and consultation is available on the Neighbourhood Plan section of the Woodcote Parish Council website³.
- On 23rd and 24th of February 2018 there was a public exhibition and drop-in consultation at the Village Hall to consult on potential site evaluation criteria, possible development sites, and a proposed housing requirement. Attendees returned over 400 questionnaires which demonstrated strong support⁴ for the recommended sites.
- On 26th October 2019 there was a public exhibition and drop-in consultation at the Village Hall to present and obtain views on a proposed second Woodcote Neighbourhood Plan. Attendees returned 123 questionnaires which demonstrated strong support for the recommended development sites⁵ and new policies to reduce climate change and support biodiversity.

iv. Woodcote Parish Council Website

The Woodcote Parish Council website:

- explains the Parish Council's reasons for updating the current neighbourhood plan;
- describes the organisation of the Neighbourhood Plan Advisory Group and methodology employed;
- contains reports providing the results of community consultations and surveys; and
- has the minutes of the meetings of the NPAG.

The website also contains a form for enquiries or views to be submitted to the NPAG.

v. Meetings

- Members of the NPAG were available to meet with any resident, landowner or agent who wished to discuss any matter applying to the development of the second Woodcote Neighbourhood Plan. Of particular significance was the acceptance of an invitation to all those owning or representing the owners of potential sites to meet with members of the NPAG by 17 owners or their agents.
- In addition, three open on-line (Zoom) surgeries were held in April and May 2021.

¹ Woodcote Village Appraisals 1991 and 2000

² www.woodcoteparishcouncil.org.uk/Village-Survey-2017

³ www.woodcoteparishcouncil.org.uk/May-2017-Consultation

⁴ www.woodcoteparishcouncil.org.uk/February-2018-Consultation

⁵ www.woodcoteparishcouncil.org.uk/October-2019-Consultation

Section 2: Pre-Submission Consultation

2.1 Consultation Approach

The pre-submission consultation began on Saturday 3rd April 2021 and closed at 17:00 on Saturday 15th May 2021.

The consultation proceeded along two main lines:

- i. consulting those within the Parish (the **Local Consultation**); and
- ii. consulting the bodies referred to in paragraph 1 of Schedule 1 of the Neighbourhood Planning (General) Regulations 2012 (the **Statutory Consultees**).

A complete set of responses from both the Village Consultation and the Statutory Consultees is provided in Appendix B.

2.2 Local Consultation

The Pre-submission consultation for the WNP1 was launched with an exhibition in the Village Hall and associated publicity. The pre-submission consultation for WNP2 began on 3rd April 2021 at which time Coronavirus restrictions did not permit indoor public events until, at the earliest, 17th May 2021. As such a public exhibition in the Village Hall was impossible and the Ministry of Housing, Communities and Local Government (MHCLG) issued the guidance⁶ below for public consultations.

2.2.1 Publicity

Public consultation: The Neighbourhood Planning (General) Regulations 2012 require neighbourhood planning groups and local planning authorities to undertake publicity in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area at particular stages of the process. It is not mandatory that engagement is undertaken using face-to-face methods. However, to demonstrate that all groups in the community have been sufficiently engaged, such as with those without internet access, more targeted methods may be needed including by telephone or in writing.

Table 2.1 summarises the key elements of the publicity announcing the consultation. Central to this was a four-page, four-colour leaflet delivered to all premises in the community, a four-page, four-colour summary delivered to all premises in the community, announcements on the Parish Council website and social media and posters displayed in local shops.

2.2.2 Plan Availability

There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require at some stages of the process for neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location. They may be held available online.

To comply with the Coronavirus restrictions and MHCLG guidance Woodcote Parish Council used the internet to make the draft plan available and provide the ability to respond online⁷. Residents without internet access or the ability or wish to respond electronically could request a paper copy of the draft Plan, submit written comments using the questionnaire form on the back of the Correspondent or other preferred format.

⁶ www.gov.uk/guidance/neighbourhood-planning--2#covid-19

⁷ www.smartsurvey.co.uk/s/WNP2CONS

In addition, copies of the draft Sustainability Appraisal, the draft Landscape and Visual Impact Assessment, the Objectively Assessed Housing Need and a paper on Major Development in an Areas of Outstanding Natural Beauty were provided.

Date	Media	Publicity	Notes
28-Mar-21	Parish Council Meeting	Formal adoption of the draft Plan by the Parish Council	
01-Apr-21	Woodcote Correspondent	The announcement of the consultation and a response form delivered to all premises in the parish and to homes outside, but near to the parish.	Appendix A-2 Figures A-2 a) to A-2(d)
01-Apr-21	Woodcote Correspondent	A 4-page Plan summary distributed to all premises in the parish and to homes outside, but near to, the parish.	Appendix A-3 Figures A-3(a) to A-3(d)
01-Apr-21	Woodcote Parish Council website	A copy of the draft Plan, response forms, and other key documents available on the Woodcote Parish Council website.	Appendix A-4 (On-line response form)
01-Apr-21	Local shops and Parish Council notice boards	Posters promoting the consultation and providing the dates and an indication of how to obtain details and submit views.	Appendix A-5
05-Apr-21	Henley Standard article	An announcement in the local newspaper giving details of the consultation and some key elements of the draft Plan.	Appendix A-1
10-Apr-21	15:00	On-line (Zoom) surgery and Q&A	
12-Apr-21	Facebook	Reminder on Parish Council Facebook, shared with village (Wonderful Woodcote) Facebook	
14-Apr-21	19:30	On-line (Zoom) surgery and Q&A	
26-Apr-21	Facebook	Reminder on Parish Council Facebook, shared with village (Wonderful Woodcote) Facebook	Appendix A-6
06-May-21	19:30	On-line (Zoom) surgery and Q&A	

Table 2.1: Key Publicity Events

Courtesy copies were also sent to:

- John Howell Member Parliament for the Henley Constituency
- Jo Robb District Councillor for the Woodcote and Rotherfield Ward
- Lorraine Hillier District Councillor for the Woodcote and Rotherfield Ward

2.3 Statutory Consultees

The organisations listed in Table 2.2 were requested, by e-mail, to comment on the draft WNP2.

Oxfordshire County Council	Ipsden Parish Council
South Oxfordshire District Council	Checkendon Parish Council
Vale of White Horse	Goring Heath Parish Council
Cherwell District Council	Goring Parish Council
Reading Borough Council	South Stoke Parish Council
West Berkshire Council	
West Oxfordshire District Council	
Oxford City Council	
Chilterns Conservation Board	North Wessex Downs AONB
Natural England	Environment Agency
Historic England	Homes England
Network Rail	Highways Agency
MONO Consultants Ltd for Mobile Operators Association (MOA)	EMF Enquiries - Vodafone & O2
British Telecom	BT Openreach (Broadband)
EE	Three
Thames Water	Thames Water - Developer Services
Avison Young (on behalf of National Grid)	National Grid
UK Power Networks	Scottish and Southern Energy Power
Southern Gas Networks	Cadent
The Coal Authority (Planning and Local Authority Liaison Department)	Marine Management Organisation
Oxfordshire Clinical Commissioning Group	NHS England
Woodcote Conservation Group	Woodcote Volunteers
Churches Together in Oxfordshire	

Table 2.2: Statutory Consultees Invited to Comment

Section 3: Overview of Pre-Submission Consultation Responses

The consultation generated:

- 3 responses from Statutory Consultees.
- 70 responses from Woodcote residents; 54 submitted on-line and 16 submitted by completed paper form to the Parish Office;
- responses from 4 individuals not resident in the Parish; and
- 2 responses from organisations (agents).

South Oxfordshire District Council

South Oxfordshire District Council submitted two responses: one in respect of a Local Green Space and a separate, lengthy, submission. Their submission is of such a scale that it is discussed separately in Section 4. Appendix C presents the full list of their comments, together with the response of Woodcote Parish Council.

3.1 Comments from Statutory Consultees excluding South Oxfordshire District Council

Appendix B-1 contains the responses received from Statutory Consultees together with the response of Woodcote Parish Council. Overall, the Parish Council note:

- the lack of response and, therefore, general satisfaction with the proposals;
- the comments from OCC about highways and schools and accept that these are beyond the scope of a neighbourhood plan;
- the support of Natural England for the green space and wildlife measures and the suggestion that WNP2 could go further; and
- the need for correction on the planning status of WNP1 sites. This has been updated.

3.2 Comments from Residents

The consultation asked:

- Have we identified the important aspects, good and bad, of living in Woodcote?**
70 responses were received of which 92% of those who answered said Yes with 8% saying No.
- Overall, do you support the Woodcote Neighbourhood Plan?**
68 responses were received. 83% of those who answered said Yes with 17% saying No.
No common messages emerge from those objecting although several mention traffic congestion on the Reading Road and concern was singly expressed about the negative impact of infill, the loss of less expensive homes as small dwellings are expanded, the lack of services and the impact on the GP service.

Appendix B-2 provides the comments from residents.

3.3 Comments from Individuals not resident in the Parish

- Have we identified the important aspects, good and bad, of living in Woodcote?**
5 responses were received in which all who answered said Yes.
- Overall, do you support the Woodcote Neighbourhood Plan?**
6 responses were received. 75% of those who answered said No.

The common reason here was support for two sites not allocated in WNP2.

Appendix B-3 contains the comments from individuals not resident in the parish.

3.4 Comments from Agents and Organisations other than Statutory Consultees

Two submissions were received from Pro Vision on behalf of two companies with interests in developing sites in the village - the land behind Bridle Path (WNP2 Site WNP2-6) and the land at Wood Lane (WNP2 Site WNP2-4). These submissions were submitted as comments on the WNP2 Response Form with attachments. Comments made on the WNP2 Response form are considered in Appendix B4-1. Comments made in the attachments are included as Appendix B-4.2. The Parish Council's consideration of the content of the attachments, which differ only in the sites they promote, is provided in Appendix B-4.3.

To avoid repetition the Parish Council respond only once to the duplicated points and separately to the site-specific points where this is necessary.

3.5 Summary

A complete list of the pre-submission consultation responses (as presented including grammatical and spelling errors), together with the response of the Parish Council, is provided in Appendix B. Eight main themes emerge:

- **The Plan succeeds in identifying the important aspects of living in Woodcote.**
- **The Plan has substantial overall support.**
- **There is some confusion over the scope of the Plan.**

Concerns were raised about the ability of the two state schools to accommodate the consequent increase in the number of children in the village, the condition of the Primary School, the ability of the health centre to cope with the extra demand, and, above all, the limited action taken to improve traffic congestion and speeding in the village. While the Advisory Group and Parish Council understand these concerns, education, medical services, and highways cannot be addressed directly by a Neighbourhood Plan although the WNP2 does make recommendations for follow-up action in these areas.

- **The Number of New Homes**

A small number of residents objected to the number of new homes being proposed citing the impact on the AONB and medical practice, but this was at a low level.

Those promoting development (SODC, owners of sites not allocated for development and their agents) objected strongly to the allocation not meeting the 15% blanket allocation applied to the larger villages in the district.

Woodcote Parish Council provided, as required by paragraph 4.28 of the SOLP35, a Landscape and Visual Impact Assessment. SODC officers, separately, added new requirements for a Landscape Capacity Assessment and a Landscape Sensitivity Assessment.

- **Countryside and the Environment**

Residents and Natural England strongly supported the WNP2 policies on the Countryside and Environment and suggested that additional steps supporting the environment and wildlife in the Parish be considered.

- **Housing Sites**

There were a small number of comments, mainly from immediate neighbours, against some allocated sites.

Two near-identical submissions from the agent representing the companies with interests in developing land in the village – the land behind Bridle Path (WNP2 Site WNP2-6) and the land at Wood Lane (WNP2 Site WNP2-4) objected strongly to the non-allocation of their sites

The Planning Policy Team at South Oxfordshire District Council and the two responses from the agent also objected to the failure to allocate sufficient land to meet the proposed allocation in the SOLP35.

- **Traffic Policies**

A few comments expressed concern about traffic on the Reading Road, near the schools and at the junction of Wood Lane, Behoes Lane and Beech Lane.

- **Design Policies**

Residents supported the policies to support the reduction of the carbon footprint of new homes but both the Planning Policy Team at South Oxfordshire District Council and the two responses from the agent considered the requirements for two electric vehicle charging points for every new home with three or more bedrooms and solar panels on all new homes to be 'unduly onerous'.

Section 4: The Response from South Oxfordshire District Council

4.1 Background

Appendix C presents the SODC input to the pre-submission consultation together with the response from Woodcote Parish Council. Much of the input from the SODC Planning Policy Team derives from the WNP2 allocation of sites for new homes in the parish that does not meet the number of new homes allocated to Woodcote by the SOLP35. Given the repeated references to this difference the Parish Council decided it would be helpful to address this issue in the main body of this report.

The SODC input also contains significant contradictions and objections on policies, such as those to drive CO₂ reduction which appear to run counter to the District Council's position, so a brief comment on these is also included in this section. Additional detail can be found in Appendix C.

4.2 Additional Sites for New Homes

4.2.1 The NPPF

Woodcote is one of only two of the 'larger' villages in the district wholly enclosed, and washed over, by the Chilterns AONB. As such new development will require greenfield sites in, and intrude into the landscape of, the AONB.

The NPPF (paragraph 175) requires plans to '*distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework*'.

The NPPF (paragraph 176) requires that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.*" and is clear that "*The scale and extent of development within these designated areas should be limited.*"

4.2.2 South Oxfordshire Local Plan 2013-2035 Policy H4

Policy H4 of the SOLP35 makes a blanket allocation of a 15% increase on the number of dwellings in the parish to each of the larger villages in the district. For Woodcote this is in addition to the 7% increase in the South Oxfordshire Core Strategy 2012 which increases the size of the village by some 23% since 2012.

4.2.3 South Oxfordshire Local Plan 2013-2035 Policy ENV1

In recognition of the instruction in NPPF paragraph 176, the South Oxfordshire SOLP35 policy ENV1 requires:

- i. the highest level of protection to be given to the landscape and scenic beauty of the Chilterns Area of Outstanding Natural Beauty;
- ii. development in an AONB or affecting the setting of an AONB will only be permitted where it conserves, and where possible, enhances the character and natural beauty of the AONB;
- iii. development in an AONB will only be permitted where it is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB;
- iv. development proposals that could affect the special qualities of an AONB (including the setting of an AONB) either individually or in combination with other developments, should be accompanied by a proportionate Landscape and Visual Impact Assessment; and
- v. that South Oxfordshire's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of South Oxfordshire's landscapes.

Policy ENV1 further establishes the Chilterns AONB Management Plan as a material consideration in decision making.

4.2.4 The Chilterns Conservation Board.

The Chilterns Conservation Board (Dr Lucy Murfett) in its submission to SODC also draws attention to the lack of a case for a '*mathematically-derived village growth percentage*' and the absence of evidence of exceptional circumstances or public interest. Dr Murfett's submission notes that:

- i. the NPPF is clear that LPAs should allocate land with the least environmental or amenity value (NPPF para 171*) which will mean avoiding land in the AONB or its setting;
- ii. the Council has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty;
- iii. The NPPF paragraph 172* not only instructs that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues*" but also requires that "*The scale and extent of development within these designated areas should be limited*"; and
- iv. the Chilterns Conservation Board considers that the Council should focus development on sites outside, and which do not affect the setting or appreciation of, the AONBs.

*Now paragraphs 175 and 176 in the July 2021 issue of the NPPF.

4.2.5 Neighbourhood Planning: Basic Conditions

To be 'made' a Neighbourhood Plan must demonstrate that the Neighbourhood Plan⁸:

- a) has regard to national policies and advice contained in guidance issued by the Secretary of State;
- b) contributes to the achievement of sustainable development;
- c) is in general conformity with the strategic policies contained in the development plan for the area of the authority; and
- d) does not breach, and is otherwise compatible with, EU obligations.

This demonstration is provided in the Basic Conditions Statement that accompanies this Neighbourhood Plan. However, the response from SODC criticises the failure of the WNP2 to meet the arithmetically derived allocation of SOLP35 Policy H4 as failing to comply with a Strategic Policy and hence the Basic Conditions.

4.2.6 SOLP35 Strategic Policies

The NPPF (paragraph 21) requires that

- i. plans make explicit which policies are strategic policies. Footnote 14 to this paragraph notes that 'Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies';
- ii. strategic policies should be limited to those necessary to address the strategic priorities of the area, to provide a clear starting point for any non-strategic policies that are needed; and
- iii. strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.

Woodcote Parish Council note:

- the identification (SOLP35, Chapter 3) of 16 policies as strategic (STRAT1 to STRAT14 inclusive);
- the further identification (SOLP35, Appendix 14) of 79 of the SOLP35 102 policies as strategic – some 77% of the total;
- that identifying 77% of the policies as strategic seems excessive when compared with the NPPF requirement that '*strategic policies should be limited to those necessary to address the strategic priorities of the area*'; and
- the discrepancy between the policies listed as part of the strategy (STRAT1-14) in the main body of the plan) and the additional identification of further strategic policies in an appendix comparing the old Core Strategy policies with the new Local Plan polices does not seem to meet the NPPF requirement that '*non-strategic policies should be clearly distinguished from the strategic policies*'.

⁸ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (Last updated 25 September 2020)

Included in the 77 policies identified as strategic are policy H4 (Housing in the Larger Villages) and policy ENV1 (Landscape and Countryside).

Policy H4 allocates a 15% increase in housing to all larger villages, whether in an AONB or not. This allocation is in addition to the 7% already allocated in the South Oxfordshire Core Strategy adopted in December 2012 and can only be achieved in Woodcote by allocating housing sites on the periphery of the village that intrude into the AONB. Two of the potential sites have been the subject of multiple planning applications that have been rejected because they were major development in an AONB that could not be justified by exceptional circumstances. Many of the other potential sites are similar in size and location and would also constitute major development – a key consideration for plan making as well as decision taking (NPPF paragraph 11). A planning application for another site was also rejected by SODC because of the impact on the AONB.

This level of housing growth can only be delivered by major development in the AONB, which is specifically prohibited by paragraph 177 of the NPPF unless in exceptional circumstances and where it is in the public interest. In this instance the SOLP35 advances no exceptional circumstances nor evidence that the arithmetically derived allocation is in the public interest. Furthermore, SOLP35 policy ENV1 requires *'the highest level of protection to be given to the landscape and scenic beauty of the Chilterns Area of Outstanding Natural Beauty'* and only allows development in the AONB where *'it conserves, and where possible, enhances the character and natural beauty of the AONB'*.

SOLP35 Policy H4, when applied to a village constrained by an AONB, is in clear conflict with policy ENV1, and the Chilterns AONB Management Plan – a material consideration. The SOLP35 recognises this contradiction stating (paragraph 4.28) that *'Some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones'* and resolves it by further stating that *'Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB, a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable'*.

Woodcote Parish Council note that the Examiner of the SOLP35 accepted the conflict and the role of a proportionate Landscape and Visual Impact Assessment as the means of resolving it.

The requirement for a proportionate Landscape and Visual Impact Assessment is explicit in SOLP35 paragraph 4.28 and was confirmed in a Zoom meeting with Planning Policy Officers on 14-Oct-20. Representatives of the Woodcote Neighbourhood Plan team were specifically told by Ricardo Rios that a Landscape and Visual Impact Assessment was required. To confirm this an e-mail (figure 4.1) was sent to SODC Planning Policy Manager Dr Lucy Murfett. In the absence of a reply, the Woodcote Team proceeded with the LVIA on the assumption that there had been no change to the Rios instruction.

In the SODC response to the pre-submission version of the WNP2 the Planning Policy officers say that a Landscape and Visual Impact Assessment is not appropriate and that a Landscape Capacity Assessment is required. In the same response the SODC Landscape Officer says that a Landscape Sensitivity Assessment is required despite the requirements of paragraph 4.28 of their SOLP35.

Woodcote Parish Council note that the Woodcote Landscape and Visual Impact Assessment uses the exact methodology accepted by South Oxfordshire District Council and the examiner in the Goring NP and has been professionally reviewed by a consultant from LandArb Solutions who is a chartered member of the Landscape Institute, to ensure precise alignment with GLVIA3 and to produce a robust and, as required, proportionate assessment.

4.2.7 General Conformity

Section 4.2.5 identifies the requirement for Neighbourhood plans to be in general strategic conformity with the strategic policies contained in the development plan for the area of the authority.

The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government offers this advice under the heading 'what is meant by 'general conformity?'

When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- i. whether the Neighbourhood Plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with;
- ii. the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy;
- iii. whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy; and
- iv. the rationale for the approach taken in the draft neighbourhood plan or order and the evidence to justify that approach

Woodcote Parish Council have followed this guidance and note the following in respect of the four tests above:

- i. the WNP2 supports both the principle of policy H4 by allocating sites for additional new homes in the parish while supporting the principle of protecting, as required by both the NPPF and SOLP35 (policy ENV1) the landscape of the AONB;
- ii. the SOLP35 plans for some 30,000 new homes in the district. The difference between the neighbourhood plan allocation for Woodcote and the requirement of the SOLP35 constitutes some 0.2% of that total which, given the level of contingency in the SOLP35 (some 4-5,000 homes) is trivial whilst making a significant contribution to policy ENV1 and given Woodcote's unique location in the AONB, does not set a precedent that might be seen as undermining policy H4 or policy ENV1;
- iii. of necessity the Local Plan cannot be supported by the degree of detail that a neighbourhood plan is built upon. The WNP2 adds a detailed LVIA to the data available to SODC which, rather than undermining the SOLP35, supports its policy in respect of allocating development in the AONB whilst protecting the landscape of the AONB and complies with the requirement for a village constrained by an AONB identified in paragraph 4.28 of the SOLP35; and
- iv. the rationale used to identify a proper balance between the requirement for more development (SOLP35 policy H4) and protection of the AONB (SOLP35 policy ENV1) is that identified in paragraph 4.28.

Figure 4.1
Letter sent, by e-mail, to Dr Lucy Murfett following the Zoom meeting on 14-Oct-20 between Ricardo Rios and Dr Murfett (SODC) and Mr Malcolm Smith and Dr Geoffrey Botting (Woodcote Parish Council)

Ms Lucy Murfett
Planning Policy Manager
South Oxfordshire and Vale of White Horse District Councils

Wednesday, 28 October 2020

Dear Lucy,

many thanks for the time you spent with us last week. It's particularly appreciated given that you have rather larger concerns at the moment. That said it's become apparent that there are different recollections of previous meetings with the Planning Policy team, albeit before your appointment, so a note of the key points that we took from the meeting, which we hope accurately reflects your view, seems sensible.

1. Suggested modification of Policy H4.

We raised our concern about a perceived conflict between policy H4 and the supporting text and suggested that the second paragraph of policy H4 should be amended to remove the words "to meet these requirements" and the footnote amended to remove the word "sufficient". Given that some villages are entirely within the AONB it suggests that SODC will approve planning applications for sites in addition to those allocated in the Neighbourhood Plan should the Plan not allocate enough sites to meet the numbers set out in paragraph 1 of policy H4, despite the recognition in paragraph 5.30⁹ that some villages may be constrained by the AONB. We understand that you do not

⁹ Renumbered as 4.28 in the adopted version of the SOLP35

want to make this change but appreciate your assurance that should a NP allocate sites for fewer than the number in paragraph 1 then provided the evidence supported a different number this would be accepted.

2. The Evidence Base.

Given Woodcote's location in the AONB then decisions to allocate, or not, a site for development must be supported by an evidence base that includes a proportionate Landscape and Visual Impact Appraisal. We will provide such an Appraisal.

3. Housing Numbers

At no time have we agreed the number of new homes to be built in the parish with the Planning Policy Team and have always indicated that we expect landscape constraints to limit the number of houses that we can accommodate. Not only do we not have the authority from the Parish Council, as the designated body, to agree numbers but also we had not, at the time of our previous meeting, an Objectively Assessed Need nor a completed set of site assessments.

We hope that the above accurately reflects your recollection of the meeting. If not, then please let us know so that we can move on quickly with our second Plan. The first has been a great success, for both Woodcote and SODC, and it would be nice to repeat that with your new Local Plan being quickly supported by a new Woodcote NP.

Geoff Botting, Secretary
Malcolm Smith, Chairman
Woodcote Neighbourhood Plan Advisory Group

4.2.8 Housing Needs Assessment

SODC challenge the Housing Needs Assessment produced by the Parish Council as valid evidence supporting the allocation in the pre-submission version of the second neighbourhood plan. This Housing Needs Assessment is not, and was not, used to determine the number of new homes to be built in Woodcote. It was produced to develop a greater understanding of the local need and is not part of the alleged 'justification for not delivering the requirement set out in the SOLP35'.

Woodcote Parish Council have examined all possible sites in the parish and, supported by a thorough Landscape and Visual Impact Assessment and considerations of environmental and social sustainability, have concluded that the arithmetically derived allocation, which does not differentiate between villages within the AONB and those without, cannot be delivered whilst complying with requirements of paragraphs 174-177 of the NPPF and policy ENV1 of the SOLP35.

4.3 Carbon Footprint Reduction

4.3.1 Capturing Solar Energy

SODC object to a policy requiring all new development in Woodcote to have solar photovoltaic panels and/or solar water heating panels as 'unduly onerous'.

Woodcote Parish Council:

- i. strongly support South Oxfordshire District Council's recognition that the climate and ecological crises are the greatest challenges facing our society and their declaration in February 2019, of a **climate emergency**;
- ii. strongly support the Council's goal of becoming a carbon neutral district by 2030;
- iii. note that homes are responsible for some 18% of CO₂ emissions; and

- iv. include this CO₂ reduction policy in support of the SOLP35 policies DES9 (Renewable and Low Carbon Energy); and DES10 (Carbon Reduction), and the wishes of residents who are equally concerned about the impacts of climate change and support strong measures to address the threat.

4.3.2 Electric Vehicle Support

SODC regard a policy in the WNP2 requiring each new dwelling of 3 bedrooms or more to provide 2 electric vehicle charging points as 'unduly onerous'.

Woodcote Parish Council are keen to support the district council's goal of reducing CO₂ emissions by removing a domestic obstacle to private vehicle purchasers in the parish buying an all-electric or a hybrid vehicle.

Woodcote's location, lack of services (The South Oxfordshire Settlement Assessment of 2017 ranks it 11th of 13 larger villages, even before the village lost its restaurant and its Post Office), and an inadequate, unreliable bus service make two cars a necessity for most families. This need is reflected in 60% of Woodcote household owning two, or more, cars significantly higher than the rest of the district. The ability to charge two electric vehicles simultaneously is therefore important and the installation of charging points most cheaply installed when the dwelling is under construction.

4.3.3 Climate Change

Woodcote Parish Council note the recent report (9-Aug-21) from the Intergovernmental Panel on Climate Change that notes that levels of CO₂, the primary driver of global heating, were higher in 2019 than at any time in "at least 2 million years" and that the climate goals agreed in Paris in 2015 of 1.5°C and 2°C are slipping 'beyond reach'.

The Parish Council consider requiring all new development to capture solar energy and to have the ability to charge two electric vehicles simultaneously as both essential, albeit small, measures to reduce CO₂ emissions and consistent with national and local government moves to limit the impact of global warming.

Section 5: Plan Changes

The Parish Council has reviewed all comments and, where appropriate, amended the Neighbourhood Plan. Appendix D contains a full list of the amendments to the consultation version of the plan. In summary:

1. there are minor changes to sections 1, 2,3, 4, 7 and 13.
2. there are no changes to sections 5 and 8.
3. in section 6 (Community Well-Being) policies C4 and C5 have been amended to reflect the wording suggested by SODC.
4. In section 9 (Countryside and the Environment):
 - i. Policy E1 was reworded, as recommended by SODC, to refer to major developments and to remove the need for baseline ecological surveys;
 - ii. Residents and Natural England strongly supported the WNP2 Countryside and Environment policies and suggested that additional steps supporting the environment and wildlife in the Parish be considered, thus:
 - policy E3 was amended to include the requirement for a baseline ecological survey and, as suggested by Natural England, measures for wildlife corridors and green infrastructure added; and
 - policy E4 was extended to include redevelopment.
 - iii. In addition:
 - Table 9.i was amended to split the Local Green Space 8 to reflect the separate ownership;
 - reference to the source of the ecological significance of Woodcote was added; and
 - references to the evidence papers supporting the recommendations for the Settlement Boundary, the designation of Local Green Spaces and Important Views were added.
5. In section 10 (Housing Policies):
 - i. additional information was included to describe the approach taken to identify the number of new homes that could be delivered whilst complying with the NPPF and SOLP35 requirements with respect to conserving and enhancing Areas of Outstanding Natural Beauty;
 - ii. a reference to the Landscape and Visual Impact Assessment (specified in paragraph 4.28 of the SOLP35) as part of the evidence supporting the identification of sites in AONBs) was added; and
 - iii. minor changes to the wording of policies H1, H2, H9 were made in response to SODC comments and a definition of backland development was included in policy H10.
6. In section 11 (Design Policies) residents supported the policies to support the reduction of the carbon footprint of new homes but both SODC officers and the agent for the potential developers objected, as 'unduly onerous', to the policies requiring two electric vehicle charging points on new homes with three or more bedrooms and solar panels. Additional evidence was provided to support the requirement for two charging points and a reference to Oxfordshire County Council cycle parking standards added (policy D6).
7. In section 12 (Development Site Policies):
 - i. the status of sites allocated in WNP1 was updated to reflect the recent grants of planning permissions and commencement of development;
 - ii. the wording identifying the planning status of these sites allocated in policies HS2, HS3 and HS4 is moved to the supporting text;
 - iii. a description of the completed development of site WNP-18 (the former Bus Depot, Long Toll) is added;
 - iv. an explanation for the number of flats allocated in Policy HS8 is added;
 - v. Policy HS10, which allocated development to Goats Gambol, is deleted following the withdrawal of the site for development by the new owner.
8. In Section 13 (Our Village – Our Future) a recommendation that the brief for a working group to be established to 'carry out a baseline wildlife survey and identify measures to protect/enhance wildlife' is extended to include the green infrastructure in the village.
9. Appendices D, E and F were updated to reflect changes in the Neighbourhood Plan.

These changes were reviewed and approved by the Woodcote Parish Council at the meeting held on 17-Nov-21. The agenda for this meeting was, as is required, publicised 3 working days before the meeting and members of the public were invited to attend.

APPENDIX

Appendix A: Pre-submission Consultation Publicity and Response Items

Appendix A-1: Henley Standard Announcement

Henley Standard

‘Villagers should be given first choice of new homes’

05 April 2021

RESIDENTS of Woodcote should be given first choice of new housing in the village, says the parish council.

This is because there aren't enough smaller units, particularly for young people who grew up in the village and would like to remain in order to start a family.

The council will begin public consultation on a draft of its revised neighbourhood plan tomorrow (Saturday). The document earmarks land for 57 more new homes to be built by the year 2035. It calls for more smaller units and says properties should be available to residents only in the first three months of going on the market. The plan also sets policies on other aspects of community life, including traffic and transport, education, employment and protecting the village's rural surroundings. It will be put to a referendum next year.

Woodcote's first neighbourhood plan, which was adopted in 2014, earmarked land for 76 new homes to be built across five sites by 2027. Most of these developments are now either built or planning permission has been granted. However, the village's quota must increase to reflect rising demand.

South Oxfordshire District Council, the planning authority, said Woodcote should take 115 more homes when it published its local plan in December. But the parish council says this is too many and would have a "significant" impact on the Chilterns Area of Outstanding Natural Beauty. It says the district council's figure proved highly unpopular among residents during consultation and that its own research showed no more than 60 units were needed anyway. The village doesn't have to accept the higher target if it can prove there are valid planning grounds for a lower figure.

The draft plan suggests building on five sites as follows:

- A 1.46-hectare field to the east of Church Farmhouse, off Reading Road. This is the largest of the five and could take 30 homes, including 12 "affordable" ones. The site would be accessed by a new entrance and would include a footpath along the frontage. It would also have a public car park with enough spaces to alleviate a long-standing parking problem on the main street. The parish council says it would ask Oxfordshire County Council to install a zebra crossing as the area would become much busier.
- The office complex at Beechwood Court, off Long Toll. This could be converted into 14 flats each with either one or two bedrooms. It would mean losing employment space but the building has been mostly empty for some time and there has been little interest from potential tenants. Additionally, the plan allocates commercial land elsewhere to make up for this loss.
- Two plots behind Yew Tree Farmhouse, off Behoes Lane, which measure a total of 0.82 hectares and could accommodate five and four homes respectively. An existing access track would be widened, and the site would be screened off by trees as it is at the edge of the village in a rural location.

- Half a hectare of land at Goats Gambol, a private house off Beech Lane, which could take four new homes. Access would be through land owned by a neighbour who has given permission.

The plan also allocates two sites for employment, one measuring less than a third of an acre at Church Farm, off Reading Road, and the other at Wards Farm, off Greenmoor, of about 0.14 hectares. The latter would have some parking as the street has congestion problems.

The parish council drew up the list after surveying the entire village and holding consultations three years running from 2017. It heard from dozens of landowners who wanted to build on or sell land but said most of the sites were unacceptable due to the impact on the countryside.

The council says priority should be given to three-bedroom family homes to buy as well as “affordable” housing for rent and shared ownership and smaller one- or two-bedroom properties to help people to downsize. It accepts some larger properties will have to be built but this should be minimised as 38 per cent of Woodcote’s existing homes have four or more bedrooms, twice the national average, and this imbalance must be addressed. The document says: “Residents have consistently expressed an overwhelming desire that affordable housing should meet the needs of local people... the sustainability and balance of the community is threatened because young people are forced to move away.”

The council says the village primary school in Reading Road is in poor condition and undersubscribed, which is a source of “great concern” among villagers, while Langtree School, the secondary next door, is oversubscribed. In principle, it supports building a new primary school as this would attract more pupils and allow Langtree to expand. Otherwise, the primary needs “urgent” improvements. It says there are congestion problems in Reading Road, at the war memorial crossroads and outside the Co-op shop in Bridle Path so any development must not make these worse.

The plan also commits the council to forming a climate change working group to address the global emergency and an ecological working group to protect wildlife habitats.

Councillor Malcolm Smith, chairman of the plan group, urged residents to give feedback. He said: “A neighbourhood plan gives us more control over development in the village. The first one has been very successful but is no longer up to date and it has got to remain current in order to have any power. “It has helped us to ensure that any development is appropriate and I would very much hope that the community accepts what we’re proposing as we consulted extensively when putting it together. “There has been growing support for measures to address climate change since the first plan was published and our new policies reflect that, which should be welcomed.”

The revised plan must be approved by an independent examiner before the referendum can take place. It can be viewed at www.woodcoteparishcouncil.org.uk and comments are being accepted until 5pm on May 15.

There will also be three online question-and-answer sessions at 3pm on April 10, 7.30pm on April 14 and 7.30pm on May 6. To reserve a place, email malcolm.smith@woodcoteparishcouncil.org.uk

Appendix A-2: Woodcote Correspondent Announcement

Figure A-2(a)
Front Cover

April 2021

Woodcote CORRESPONDENT

Woodcote Neighbourhood Plan Update

Woodcote Neighbourhood Plan

**WOODCOTE
NEIGHBOURHOOD PLAN
2013 - 2027**

Woodcote, the Future

May 2014

→

WOODCOTE NEIGHBOURHOOD PLAN
2013-2035

CONSULTATION VERSION APRIL 2021

Your Views
Matter!

Consultation: 3rd April to 15th May

On-line or by post

Figure A-2 (b)
Inside Front
Cover

The Woodcote Neighbourhood Plan

Our current Neighbourhood Plan was adopted in 2014 and has governed development in our village since then. Widely admired and copied, it has enabled the derelict old bus depot to become new homes, mostly affordable, it has preserved the adjacent snowdrop wood as a parish owned area, and it initiated the successful project to get a zebra crossing at the War Memorial crossroads.

Our Neighbourhood Plan has not only ensured that inappropriate and unpopular development has been prevented but also enabled new development of the kind wanted by residents. In addition to the new homes on Long Toll planning permission has been granted for three other sites in our Plan and we expect building work on two of these to start soon.

To be effective our Neighbourhood Plan must be the latest to cover our parish. The recent adoption of South Oxfordshire's unpopular new Local Plan, which promotes substantial development across the District, makes it essential that we make a new Neighbourhood Plan.

*Robin Peirce
Chair, Woodcote Parish Council*

The Updated Neighbourhood Plan

The new South Oxfordshire Local plan allocated 115 new homes to the village. Our consultations showed this to be extremely unpopular with residents, more than is wanted and more than the parish can take without significant impact on our natural surroundings.

After widely consulting with the village, and carrying out an assessment of our housing need, we believe that no more than 60 new homes are needed and have identified suitable sites for these.

Perhaps the most significant additions to the new Neighbourhood Plan are policies to reduce our contribution to climate change – another requirement that emerged strongly from the consultations.

To ensure that the plan reflects the majority view we need your comments on it now before it is submitted for examination. The current COVID pandemic means that this has to be done on-line or by post. To help with this you can read a copy of our new Plan and respond individually to the consultation online at www.woodcoteparishcouncil.org.uk/NP-Group/NeighbourhoodPlan or fill in the form on the back of this cover and send it to the Parish Office.

Comments must be received by 5:00pm on Saturday 15th May 2021.

*Malcolm Smith
Chair, Woodcote Neighbourhood Plan Advisory Group*

We will be holding a number of online Q&A sessions on:

- Sunday 10th April at 3:00 pm
- Wednesday 14th April at 7:30 pm
- Thursday 6th May at 7:30 pm

To reserve a place please email malcolm.smith@woodcoteparishcouncil.org.uk.

Figure A-2(c)
Inside
Back
Cover



Reference No	Date	For office use only
--------------	------	---------------------

Draft Plan: Public Consultation Response Form

Please:

- Use this form to comment on the draft Plan.
- Return the form to Woodcote Parish Council by:
 - hand or post to The Woodcote Parish Office, Village Hall, Reading Road, Woodcote R8B 0QY; or
 - email, as an attachment, to clerk@woodcoteparishcouncil.org.uk
- Complete, fully, the Personal Details section. Any forms that do not have the Personal Details section fully completed will be logged but not considered.
- Note that all forms will be available for public inspection.

Thank you.

All comments must be returned by 5pm on Saturday 15th May 2021

Personal details	
Name	
Address	
Are you a Resident, agent, or organisation?	
Telephone number	
Email address (not mandatory)	
If responding as an agent, name of client	

The Parish Council will hold your details for the purposes of processing the consultation responses only. The Parish Council's Privacy Policy can be viewed here: www.woodcoteparishcouncil.org.uk/lib/page-content/Privacy.Policy.pdf

Have we identified the important aspects, both good and bad, of living in Woodcote? <i>Please add any comments you wish to make at the end of this consultation response form.</i>	Yes	No
---	-----	----

Overall, do you support the Woodcote Neighbourhood Plan?	Yes	No
--	-----	----

Continued overleaf

Figure A-2 (d)
Back
Cover



If you would like to comment on a particular policy or section then please state the policy number or section, indicate whether you agree or disagree, and add your comments and/or suggested changes.

Policy number or section	Do you agree or disagree?	If you disagree, what changes would you suggest we make?

Additional comments:

Appendix A-3: Woodcote Correspondent Plan Summary

Figure A-3(a)
Front Page

DRAFT

Woodcote Neighbourhood Plan 2
www.woodcoteparishcouncil.org.uk/NP-Group

WOODCOTE NEIGHBOURHOOD PLAN 2013 - 2035

Our Neighbourhood Plan has been very successful - why do we need to update it now?

Because the latest plan carries the most weight when determining planning applications.

South Oxfordshire District Council's new Local Plan, which allocates more housing to Woodcote, is now the latest plan.

A draft updated Neighbourhood Plan has been produced by Woodcote residents and, before submitting to South Oxfordshire DC, the Parish Council want to hear the views of the village.

This summary sets out only the key points of the draft plan. The full version can be viewed on the Parish Council website at www.woodcoteparishcouncil.org.uk/NP-Group/NeighbourhoodPlan

You can submit your comments on the draft which must be received before 5.00pm on 15th May.

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Published by Woodcote Parish Council, The Village Hall, Reading Road, Woodcote, RG8 0QY

Figure A-3(b)
Back Page

DRAFT

WNP1-nn - sites allocated in the first Neighbourhood Plan
WNP2-nn - new sites allocated in the updated plan
Green – housing sites
Purple – employment sites

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Published by Woodcote Parish Council, The Village Hall, Reading Road, Woodcote, RG8 0QY

Figure A-3(c)
Inner Left
Hand Page

DRAFT

NEW HOUSES AND SITES

WNP1 allocated sites for 76 houses:

- ❖ the former Bus Depot on Long Toll 14 homes (completed)
- ❖ the former Reservoir site on Greenmoor 20 homes (planning permission granted)
- ❖ Woodcote Garden Centre, Reading Road 9 homes (planning permission granted)
- ❖ part of the land at Chiltern Rise Cottage 24 homes (planning permission granted)
- ❖ the Smallholding, at the end of Wood Lane 9 homes

and

- ❖ included the old coal yard, Greenmoor for employment use.

WNP2 allocates five sites for 57 houses:

- ❖ land behind Yew Tree Farmhouse 1 5 homes
- ❖ land behind Yew Tree Farmhouse 2 4 homes
- ❖ land to the east of Church Farmhouse* 30 homes
- ❖ land at Goats Gambol 4 homes
- ❖ Beechwood Court (conversion of offices to flats) 14 homes

*This site incorporates a public car park to reduce congestion on Reading Road.

WNP2 also allocates two sites for employment:

- ❖ land at Church Farm, Reading Road
- ❖ land adjacent to Wards Farm, Greenmoor (including extra car parking spaces to accommodate vehicles currently parked on Greenmoor)

location of all these sites is shown on the map on the back page of this summary.

Specific planning conditions will apply to each site to regulate such matters as the type of housing, access, environmental and landscape protection and the look and feel of the developments. The policies specifying these conditions can be seen in the full version of the proposed plan.

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Figure A-3(d)
Inner Right
Hand Page

DRAFT

- ❖ Our current Neighbourhood Plan (WNP1), which runs to 2027, allocates sites for 76 houses on 5 sites;
- ❖ SODC's new Local Plan allocates an additional 115 houses to the village in the period to 2035;
- ❖ An assessment of our local need identifies a need for no more than 60 additional houses in Woodcote to 2035;
- ❖ Surveys prove that the great majority of residents want to conserve the AONB, reduce the village's carbon footprint, and maintain the rural look and feel of the village;
- ❖ A Landscape and Visual Impact Assessment identified that most of the sites considered would have a harmful impact on the AONB;
- ❖ The updated Neighbourhood Plan responds to these wishes by identifying five sites for new housing, new car parks to reduce traffic congestion, and a series of environmental measures to help reduce our contribution to climate change.

The WNP will:

- ❖ conserve the Area of Outstanding Natural Beauty (AONB) and rural nature of Woodcote;
- ❖ use brownfield sites, where possible, to limit the loss of greenfield sites;
- ❖ protect green spaces and control light pollution;
- ❖ address climate change and biodiversity issues;
- ❖ restrict opportunities for infilling;
- ❖ give local people the first opportunity to buy or rent;
- ❖ increase the availability of 2- and 3-bedroom housing to encourage young families with children to move to the village;
- ❖ give access to Community Infrastructure Levy funding to improve local facilities.

To deliver this and ensure action the WNP sets out 49 policies covering:

❖ Community well-being	❖ Housing
❖ Traffic and transport	❖ Design
❖ Employment and skills	❖ Housing Sites
❖ Countryside and environment	❖ Employment Sites

- * Most of the policies are retained from WNP1.
- * Policies on off-street residential parking spaces, affordable housing, scale of development, housing mix and infill development have been updated.
- * Policies to preserve local green spaces and important views, support biodiversity and wildlife, and promote renewable energy, sustainable homes and transport have been introduced.

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Appendix A-4: On-Line Response Form

Figure A-4(a)
Response
Form Screen 1

NP Consultation



0%

Draft revised Plan: Public consultation response form.
Please:

1. Use this form to comment on the draft Plan.
2. Complete fully the Personal Details section. Any forms that do not have the Personal Details section completed will be logged but not considered.
3. The Parish Council will hold your details for the purposes of processing the consultation responses only. The Parish Council's Privacy Policy can be viewed [here](#).
4. Please note that all forms must be available for public inspection.

Thank you.

1. Name *

2. Address *

3. Telephone Number

4. Email address (not mandatory)

5. Are you a Resident, Agent or Organisation? *

Resident Agent Organisation

Next Page

Powered by SmartSurvey

Figure A-4(b)
Response
Form Screen 2

NP Consultation

Woodcote Neighbourhood Plan 2

60%

6. Have we identified the important aspects, both good and bad, of living in Woodcote?
Please add any comments you wish to make at the end of this consultation response form.

Yes No

7. Overall, do you support the Woodcote Neighbourhood Plan?

Yes No

[Previous Page](#) [Next Page](#)

Powered by **SmartSurvey**

Figure A-4(c)
Response
Form Screen 3

NP Consultation

Woodcote Neighbourhood Plan 2 

90%

8. If you would like to comment on a particular policy then please state the policy number, indicate whether you agree or disagree and add your comments and/or suggested changes.

	Policy/Section Number	Do you agree or disagree?	Comments/If you disagree, what changes would you suggest we make?
1	<input type="text"/>	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>	<input type="text"/>
6	<input type="text"/>	<input type="text"/>	<input type="text"/>
7	<input type="text"/>	<input type="text"/>	<input type="text"/>
8	<input type="text"/>	<input type="text"/>	<input type="text"/>

9. Don't forget to click on "Finish Survey", after answering this last question, to save your response and ensure it is included in the consultation.

Additional comments

[Previous Page](#) [Finish Survey](#)

Powered by 

Figure A-5
Promotional
Poster

Woodcote Neighbourhood Plan Update

Woodcote Neighbourhood Plan

WOODCOTE NEIGHBOURHOOD PLAN
2013 - 2027

Woodcote, the Future

May 2014

WOODCOTE NEIGHBOURHOOD PLAN
2013-2035

CONSULTATION VERSION APRIL 2021

**Your Views
Matter!**

Consultation: 3rd April to 15th May

On-line at www.woodcoteparishcouncil.org.uk
or by post (see the Correspondent)

Appendix A-6: Social Media Promotion

Figure A-6
Example Social
Media Post



Woodcote Parish Council

Published by Helen Booker · 26 April at 11:53 · 🌐

⋮

As highlighted in the March/April issue of the Woodcote Correspondent, Woodcote Neighbourhood Plan is being updated.

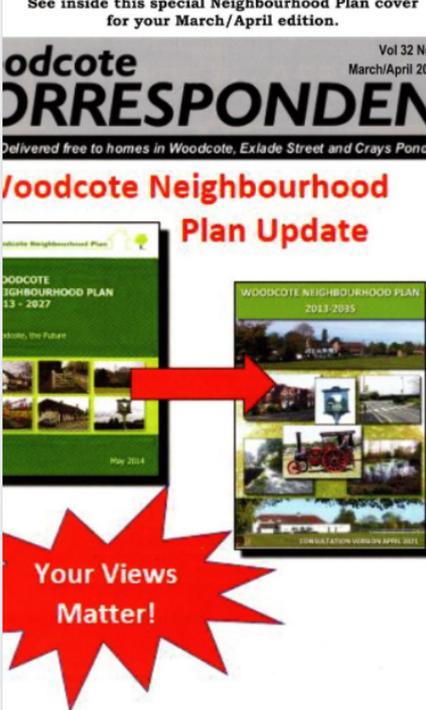
It is equally important to give feedback whether you agree with the proposals, disagree with any or have other comments to add.

This is YOUR opportunity to comment on the proposed Neighbourhood Plan 2 before it is submitted to South Oxfordshire District Council for examination.

Please do complete your form included in the Woodcote Correspondent or submit an online questionnaire by 15th May 2021.

More information is available from:
<https://www.woodcoteparishcouncil.org.uk/NeighbourhoodPlan>

See inside this special Neighbourhood Plan cover for your March/April edition.



Consultation: 3rd April to 15th May

On-line 📧 or by post 📧

Woodcote Neighbourhood Plan

Woodcote Neighbourhood Plan was adopted in 2014 and has enabled development in our village since then. Widely admired and it has enabled the derelict old bus depot to become new mostly affordable, it has preserved the adjacent snowdrop s a parish owned area, and it initiated the successful project to bra crossing at the War Memorial crossroads.

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Comments must be received by 5:00pm on Saturday 15th M

Malcolm Smith
Chair, Woodcote Neighbourhood Plan Advisory Group

We will be holding a number of online Q&A sessions on:

- Sunday 10th April at 3:00 pm
- Wednesday 14th April at 7:30 pm
- Thursday 6th May at 7:30 pm

o reserve a place please email malcolm.smith@woodcoteparishcouncil.org.uk

445
People reached

21
Engagements

Boost post

Appendix B: Pre-Submission Public Consultation Response

Appendix B-1 Statutory Consultees

This Appendix presents the comments from the Statutory Consultees together with the response of Woodcote Parish Council. In making their response the Parish Council use the following codes:

- **NCR** No Change Required because, for example, the comment is supportive of a policy, statement or other part of the Plan;
- **NCR/OPS** No Change Required because the comment is on matters that fall outside the scope of a Neighbourhood Plan;
- **NCR/PAC** No Change Required because the comments apply to matters dealt with when a planning application is being considered by the Local Planning Authority;
- **CR** Change Required

Where helpful or necessary the decision is explained with added commentary. Note that the consultees' comments often refer to paragraphs in the 2019 issue of the NPPF, the plan responses refer to the equivalent paragraphs in the 2021 issue of the NPPF.

B-1.1 Comments on Section 2: Process Summary

No Comments

B-1.2 Comments on Section 3: Goals and Objectives

No Comments

B-1.3 Comments on Section 4: Woodcote – Our Village

Responder	Reference /Policy	Comment	Plan Response
OCC Planning	4.1 Figure 4.ii	This map, <i>Figure 4.ii Parish Boundary</i> , taken from page 9 of the Draft WNP2 shows the parish and neighbourhood area with an orange line. This parish boundary is not clear at this scale. We would recommend a clearer version of this map is included in the Submission version of the Woodcote Neighbourhood Plan which should also show the Chilterns Area of Outstanding Beauty (AONB) which covers the whole parish. Areas within an AONB are afforded additional protection from development as a result of national policy.	CR The Parish boundary is shown on an improved map.

B-1.4 Comments on Section 5: Neighbourhood Plan Policies

No Comments

B-1.5 Comments on Section 6: Community Well-Being Policies

Responder	Reference /Policy	Comment	Plan Response
OCC Education	C5	Also note that Policy C5 (Schools) states that “Proposals to relocate the Primary School, if necessary, to allow expansion of Langtree Academy without loss of playing fields, will be supported, provided that the new location does not lead to traffic congestion or disturbance to neighbours.” For the avoidance of confusion, the county council notes there are no current proposals to relocate the school.	NCR/OPS Woodcote Parish Council understand that education is a matter for the County Council and beyond the scope of a Neighbourhood Plan.

B-1.6 Comments on Section 7: Traffic and Transport Policies

No Comments

B-1.7 Comments on Section 8: Employment and Skills Policies

No Comments

B-1.8 Comments on Section 9: Countryside and Environment Policies

Responder	Reference /Policy	Comment	Plan Response
Natural England	Section 9	We welcome the comments referring to green spaces, biodiversity and wildlife support in Section 9 (Countryside and Environment Policies)	NCR
Natural England	Section 9	We are supportive of the policies highlighting the need biodiversity net gain using an approved metric for any new development. Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain.”	CR Woodcote Parish Council support this request and has amended all relevant policies accordingly.

Natural England	Section 9	<p>Policies around Connectivity in the parish. Proposals for development should provide wildlife corridors that allow wildlife to move from one area of habitat to another. Where ecologically relevant, fences and walls are encouraged to incorporate features that allow dispersal of wildlife through areas of green space and gardens. We recommend keeping green space within villages and across developments in order to maintain connectivity of wider ecological networks.</p> <p>Green spaces in built-up areas also help the health and wellbeing of residents. For further reference please see paragraphs 170, 171 and 174 of the NPPF.</p>	CR Woodcote Parish Council support this request and has reviewed the emerging Neighbourhood Plan to encourage features that support wildlife.
Natural England	Section 9	<p>We feel there is scope to mention green infrastructure within the village further. While Green Infrastructure is mentioned in terms of open green space and wild green space, other areas such as allotments, green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. By encouraging greater green infrastructure, there is the opportunity to provide multiple benefits for people including recreation, health and wellbeing, access to nature, opportunities for food growing, and resilience to climate change. Annex 1 provides examples of Green Infrastructure.</p>	CR Woodcote Parish Council support this request and has reviewed the emerging Neighbourhood Plan to encourage features that support the local green infrastructure.
OCC Arch'ology	E2	<p>The Woodcote Neighbourhood plan contains policy E2 that sets out how the plan will ensure the protection of the Historic Environment. We agree that this policy is appropriate and therefore have no objection to the plan.</p>	NCR

B-1.9 Comments on Section 10: Housing Policies

No Comments

B-1.10 Comments on Section 11: Design Policies

Responder	Reference /Policy	Comment	Plan Response
OCC Transport	D6	<p>Oxfordshire County Council cycle parking standards are set out in the '<i>Oxfordshire Cycling Design Standards – A Guide for Developers, Planners and Engineers</i>' (2017) document, which states that for new residential developments in Woodcote, a minimum of 1 cycle parking space should be provided for each 1-bedroom dwelling, while a minimum of 2 cycle parking spaces should be provided for each dwelling with 2+ bedrooms, in addition to 1 stand being provided per 2 dwellings (where more than 4 dwellings) for use by visitors. The document also states that all cycle parking facilities should be secure and under cover and located in convenient positions for both residents and cyclists to use.</p>	CR Woodcote Parish Council has amended the policy as suggested.

		We suggest that the wording of Policy D6 is amended to the following: “All new development should provide...(c) secure bicycle storage facilities, in accordance with Oxfordshire County Council cycle parking standards”.	
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B-1.11 Comments on Section 12: Development Site Policies

Responder	Reference /Policy	Comment	Plan Response
OCC Transport	ES1	The proposal for the site would have to demonstrate car parking would be provided in accordance with Oxfordshire County Council standards, which is recognised in Policy ES1.	NCR
Thames Water Utilities	ES1	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	NCR
Thames Water Utilities	ES1	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	NCR
OCC Transport	ES2	The proposal for the site would have to demonstrate car parking would be provided in accordance with Oxfordshire County Council standards, which is recognised in Policy ES2.	NCR
Thames Water Utilities	ES2	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	NCR
Thames Water Utilities	ES2	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	NCR
OCC Transport	ES3	The proposal for the site would have to demonstrate car parking for the new employment units would be provided in accordance with Oxfordshire County Council standards, which is recognised in Policy ES3.	NCR/PAC

		We have no objection in principle to additional parking spaces being provided within the brown area at the site for use by employees and customers of existing businesses of Wards Farm. While dedicated car parking can often encourage people to drive to their destination rather than using alternative modes of transport, the removal of parked cars from along Greenmore would be beneficial in the interests of highway safety. A new pedestrian access from this car park to the existing businesses of Wards Farm would remove the need for people to walk along Greenmore.	
Thames Water Utilities	ES3	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	NCR
Thames Water Utilities	ES3	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	NCR
OCC Planning	Section 12	Recent planning applications for allocations in the 'made' Woodcote Neighbourhood Plan have been received by South Oxfordshire District Council: Table 12.i Sites allocated for new homes (page 39 of the draft Neighbourhood Plan) in the Allocation Status column notes 'planning permission expected soon' against three allocations in the 'made' Neighbourhood Plan. This is perhaps not the most appropriate phrase. A factual correct alternative would be 'planning application submitted' in the Allocation Status column for these sites.	CR Woodcote Parish Council have amended the planning status of two of these sites to 'planning permission granted and construction started'. The status of the third site, that has a lapsed permission, has been amended to 'to planning application submitted and under consideration by South Oxfordshire District Council'.

B-1.12 Comments on Section 13: Our Village – Our Future

Responder	Reference /Policy	Comment	Plan Response
OCC Transport Strategy	13.2	OCC comment: We note that a number of zebra crossings have been identified. It could be that other forms of crossings may need to be considered, depending on the specific location and the groups of users.	NCR/OPS Woodcote Parish Council would welcome advice from OCC Highways department on the crossing possibilities.

OCC Planning	13.4	Woodcote Primary School Page 54, section 13.4 of the draft Neighbourhood Plan states: 'The consultations for this Neighbourhood Plan revealed great concern about the poor state of the buildings of Woodcote Primary School. It is recommended that the Parish Council lend its weight to that of the governors of the school to effect urgent improvements or build a new school.' The condition of school buildings is a delegated item and therefore the responsibility of the Governing Body.	NCR/OPS Woodcote Parish Council accept this comment but note the dangerous condition and possibility of injury to a child of the school buildings.
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B-1.13 General Comments

Responder	Reference /Policy	Comment	Plan Response
OCC Planning		There is a spelling mistake in the first sentence of the supporting text for Policy HS10: Goats Gambol. Also, Greenmore the road name, is incorrectly spelt as Greenmoor throughout the draft Neighbourhood Plan	CR Policy HS10 has been removed, as the site has been withdrawn by the new owners. The spelling of Greenmore has been corrected although the Parish Council note that Greenmoor is used by the Ordnance Survey
OCC Transport Strategy		We have assumed that all reference to 'Greenmoor' in the document is the road named 'Greenmore' in Woodcote.	CR The spelling has been corrected
OCC Minerals and Waste		There are no safeguarded mineral and waste sites within the boundary of the neighbourhood plan and therefore we have no objection.	NCR
SGN		The SGN gas infrastructure in Woodcote is located throughout Woodcote and I would expect any new developments to have a gas main in close proximity. Therefore, connection to the gas network should not be a problem. Gas demand was estimated based on the future housing requirement for Woodcote, plus a bit extra demand to account for any small additional commercial sites. From the review I found that the Intermediate Pressure (IP) and Medium Pressure (MP) tiers of the network are relatively robust in this area and at this time the additional housing did not pose a risk to the operation of the system or the capacity on these pressure tiers. Please note: <ul style="list-style-type: none"> Reinforcement of the existing Low Pressure (LP) network may be necessary to support development on this scale, dependant on the site demand and the final point of connection to SGN's network. This will usually only be known when a connections enquiry/request is made. 	NCR/PAC Woodcote Parish Council accept that a more detailed response can only be produced in response to a request for a new connection, or connections, which is most likely to relate to a new planning application.

	<ul style="list-style-type: none"> • SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a ‘first come, first served basis’. • The UK Governments plan to stop all domestic connections to the gas network post 2025 was not taken into consideration at this time, however it is worth being aware of this possible new regulation. <p>Where required, SGN will look to manage the provision of any off-site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks and will only become clear once a developer’s request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN’s existing mains system but may also include the installation of above ground apparatus involving land purchase.</p> <p>As this is a high-level assessment and response, the information provided is indicative only and should be use as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the development of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:-</p> <p>Section 9 (1) and (2) which provides that:</p> <p>9. General powers and duties</p> <p>(1) It shall be the duty of a gas transporter as respects each authorised area of his:-</p> <p>(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and</p> <p>(b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him -</p> <p>(i.) to connect to that system, and convey gas by means of that system to, any premises; or</p> <p>(ii.) to connect to that system a pipe-line system operated by an authorised transporter.</p> <p>(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.</p> <p>(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -</p> <p>(a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.</p> <p>SGN would not, therefore, develop firm extension or reinforcement proposals until we are in</p>	
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	<p>receipt of confirmed developer requests.</p> <p>As SGN is the owner and operator of significant gas infrastructure within the area and due to the nature of our licence holder obligations;</p> <ul style="list-style-type: none">• Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.• Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process. SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted. <p>Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.</p>	
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Appendix B-2 Residents

This appendix contains a full list of the responses received from residents of the parish. In the list:

- i. respondents are identified by a unique number¹⁰. Each comment can thus be mapped back to the original submission using the comment number.
- ii. comments are mapped to the appropriate section of WNP2 for easier analysis.

In reviewing the comments, the Parish Council use the following codes:

- **NCR** No Change Required because, for example, the comment is supportive of a policy, statement or other part of the Plan;
- **NCR/OPS** No Change Required because the comment is on matters that fall outside the scope of a Neighbourhood Plan;
- **NCR/PAC** No Change Required because the comments apply to matters dealt with when a planning application is being considered by the Local Planning Authority;
- **CR** Change Required

Where helpful or necessary the decision is explained with added commentary. Note that the consultees' comments often refer to paragraphs in the 2019 issue of the NPPF, the plan responses refer to the equivalent paragraphs in the 2021 issue of the NPPF.

B-2.1 Comments on Section 2: Process Summary

No Comments

B-2.2 Comments on Section 3: Goals and Objectives

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
81	Section 3.3		While all the goals are laudable, it is apparent that the new plan has most successfully developed its housing goals in detail. At just first sight the other goals receive less emphasis but a careful study of the plan shows that all are developed within the choices of new sites and the caveats placed on them.	NCR

B-2.3 Comments on Section 4: Woodcote – Our Village

No Comments

B-2.4 Comments on Section 5: Neighbourhood Plan Policies

¹⁰ A full list of respondents is available.

No Comments

B-2.5 Comments on Section 6: Community Well-Being Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
44	C	Agree	Also make sure that whichever organisation digs up the roads to lay extra cables/pipes is responsible for making sure the repairs do not result in potholes and other dangerous and unsightly road surfaces, and that it is their responsibility for a period of 3-5 years	NCR/OPS
45	C2	Disagree	Policy should be amended to exclude any further development resulting in loss of car parking provision at Langtree or Woodcote Primary School. Otherwise you pose the risk of driving more school staff to have to park on the Reading Road – an existing issue that is attempting to be solved within this plan.	NCR/OPS
26	C3	Agree	Broadband needs improved speed in parts of village	NCR/OPS
26	C4	Agree we must improve	Coop will fail with more housing bad enough now, pubs need a complete makeover we need more shops in general if the village gets bigger	NCR/OPS
15	C5 Schools	Disagree	I think that the grounds of Langtree School are underused at present so there is no need for expansion. Whilst the Primary School needs major refurbishment, I think it should remain in situ.	NCR/OPS Woodcote Parish Council note that education is the responsibility of OCC.
26	6.2	Agree	The healthcare centre needs expanding and other services must be provided if the population increases	NCR/OPS

B-2.6 Comments on Section 7: Traffic and Transport Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
26	T	Disagree	Coop should be relocated in my view wrong place currently a serious accident waiting to happen	NCR/OPS
44	T	Agree	Parking is a major issue in the village and is only going to get worse with increased development. Another consideration is the Governments planned policy of stopping pavement parking. Due to the high prices of property, one bedroomed properties are likely to be bought by a couple - so 2 parking spaces should be required. There is an increasing trend for people to bring their work vehicles home and these are 'cluttering' up the streets. Wide roads like The Close, Whitehouse	NCR Woodcote Parish Council are concerned about traffic congestion, road safety and parking in the village – hence

			Road, Greenmore, etc are becoming increasingly difficult to navigate. Added to the mix is the increasing number of delivery vehicles dropping off parcels throughout the day and evenings How is this going to be catered for with new developments? 21 Whitehouse Road was given permission to be extended to a 3 bedroomed property and at the same time it has been allowed to reduce parking to one space.	the proposal for two new car parks and the requirements on new dwellings.
34	T1	Agree - needs elaboration	A more sophisticated traffic study is needed as the policy is very rudimentary	NCR/OPS
39	T1	Disagree	You still ignore the greatest risk to life in the village, that being the Checkendon junction with the A4074	NCR/OPS
25	T4		Just a typo, only 1 bus stop now	CR Plan has been amended
39	T4	Agree		NCR
27	T7	Agree.	A lot of developers are trying to get around this by not labelling rooms as a bedroom i.e. dressing room/office/ snug/extra lounge. Would like to see the policy amended to include any room on 2nd or 3rd floor that is capable of being a bedroom, as having to be included as a possible bedroom and therefore requiring a parking space.	NCR/PAC Woodcote Parish Council support this comment, but it is a matter for South Oxfordshire District Council when determining the application
39	T7	Disagree	This is not working in practice, there is no point in having a policy if it is ignored in the planning process	NCR Woodcote Parish Council do not accept this assertion.
49	T7	Agree	This is essential to avoid on street parking in congested areas of the village.	NCR
86	WNP1	Agree		NCR
86	WNP2	Agree		NCR
81	7	Agree	Travel and parking continue to be a problem in Woodcote as in most successful villages. The new attempts to move parking off the streets is to be applauded. A reduction in speeding is a much more challenging problem.	NCR/OPS

B-2.7 Comments on Section 8: Employment and Skills Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
44	EM	Agree		NCR

B-2.8 Comments on Section 9: Countryside and Environment Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
26	E	Agree		NCR
44	E	Agree		NCR
34	E1	Agree	Needs elaboration. Development densities must allow for trees (Boris tree lined streets policy)	NCR The updated Neighbourhood Plan proposes a density of 30 dph, less than that required by the SOLP35, to provide development that is appropriate to AONB and allows adequate greenspace.
30	E3	Strongly agree	There is a visible population of hedgehogs in Woodcote and are likely to be feeding and nesting in or around any site in the village which is developed. As they are a BAP (Biodiversity Action Plan) priority species and partially legally protected, I would like to suggest that developers take certain steps to mitigate for these animals in their development work: · Ensure adequate ecological surveys are undertaken to survey for hedgehogs in the area · Mitigation should always seek to avoid direct mortality to the animals and disturbance of hibernating or breeding animals. · Works taking place during October to March should be carefully undertaken to avoid injuring hibernating animals by undertaking works in suitable habitat slowly, being particular careful when using machinery within a foot of ground level or when removing brash/log piles. · Additionally, mitigation should seek to reduce any potential fragmentation of habitats through the introduction of physical barriers that prevent hedgehog dispersing – examples include hardstanding, fences and artificial lighting. Modern fencing systems that extend to ground level, particularly those with concrete gravel boards, are impermeable to hedgehogs. Where feasible, fencing should be created without the use of concrete gravel boards. A 13 x 13cm gap in gravel	NCR/PAC Woodcote Parish Council strongly support these comments, as sub-para (c) of this policy demonstrates. However, much of what is asked in this comment is a matter for the determination of planning applications.

			boards or at the bottom of the fence allows hedgehogs to pass through. Hedges or hedgerows are preferable to fences to define property boundaries. · Please avoid using fence netting unless 13cm off of the ground as this may cause entanglement and painful death for the hedgehog · Piles of dead wood and brush piles can be provided to mitigate for the removal of suitable nesting sites. Scrub patches (particularly brambles) that provide suitable hibernation nesting habitat are thought to be a limited resource for hedgehogs and small patches of this habitat may be used by many animals. Therefore, where an area of scrub is lost, efforts should be made to replant areas with scrubby native hedgerow species such as bramble and hawthorn. · Management and maintenance practices should take into account the presence/potential presence of hedgehogs and leave leaf litter in place or in piles as well as leaving log or brush piles. Where possible, in any development the total area of hard standing should be minimised in favour of grassland or permeable 'living driveways'. Hedgehogs travel around one mile every night through parks and gardens in their quest to find enough food, nest sites and a mate. I suggest that for any new housing developments, Hedgehog 'highways' are cut in the garden fences of new homes to improve connectivity throughout the development and help protect this endangered species. Examples of this have been seen in the media across numerous UK developers, including Barratt Homes/David Wilson Homes, Russell Armer Homes, Redrow Homes and Morris Homes to name a few. For more information on incorporating simple solutions like 'Hedgehog Highways' into developments please contact hedgehog@ptes.org and they will work with the developer to bring these animals back from the brink.	
30	E3	Strongly agree	I would like to see another point added to the list of measures developers will be encouraged to implement. Water is a life sustaining resource and where there is water, wildlife will come. If new developments have communal areas, I would like to see developers encouraged to build a pond (with shallow sides for access by wildlife) to provide water supply and insect food sources (for birds and small mammals including hedgehogs) as well as breeding habitat for amphibians (newts, frogs, toads).	NCR/PAC This will be part of the landscape strategy submitted with the planning application
34	E3	Agree	Needs elaboration. No specific provisions for freshwater /amphibian wildlife prolific in village and strongly valued	NCR/OPS Section 13 makes recommendations for the establishment of an ecology group to pursue environmental improvement.
43	E3	Agree strongly		NCR
45	E3	Disagree	10% requirement is potentially too restrictive. Support the suggestion of ways in which mitigation can be implemented, however suggest Local Plan Policy ENV3 on biodiversity provides	NCR

			sufficient protection. This requires that “All development should provide a net gain in biodiversity where possible. As a minimum, there should be no net loss of biodiversity.”	Woodcote Parish Council strongly support his view and believe that policy E3 delivers the shared objective of improving and protecting biodiversity.
30	E4	Strongly agree		NCR
30	E5	Strongly agree	New development should not be permitted on land designated as Local Green Spaces, without exception.	NCR Land designated as local green space cannot be built.
34	E6	Agree -	Needs elaboration. View from Entrance to Greenmoor Hill Farm on Green Lane is conspicuous omission - one of the finest views in the village looking east	CR Two views from this location have been added.
43	E7	Agree strongly		NCR
81	9	Agree	It is good that the countryside and environment policies are now developed in more detail. Identifying local green spaces (E5) and important views (E6) should provide long term protection for important assets of the village.	NCR

B-2.9 Comments on Section 10: Housing Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
81	Section 10	Agree	The new emphasis on smaller properties and on the local needs, as distinct from the national need, are most welcome. It is vital that the position of Woodcote in the Chilterns AONB, and the likely construction of some new homes on sites not designated by either plan, are kept in the forefront of implementation.	NCR
26	H policies	Disagree with locations	No more development should be allowed along any part of reading road at all and parking should be restricted on green more, reading road it is ridiculous	NCR The updated Neighbourhood Plan acknowledges the problems of traffic congestion on the Reading Road caused by parking related to the two

				schools and proposes the development of a new public car park opposite the schools to reduce these problems. Equally, the Plan recognises the problems of parking on Greenmore and allocates land for a new public carpark to relieve the congestion there.
44	H	Disagree	Are the developers of these sites being made to be responsible for increasing and improving vital infrastructures eg sewers, water supplies, etc in the village or are they allowed to make huge profits and not be responsible for negative outcomes for inadequate capacities and deterioration?	NCR/PAC
44	H		Make sure there is sufficient parking.	NCR Policy T7 addresses off-street residential parking and two of the sites incorporate additional public car parking.
44	H		Clearly define what 'Affordable housing' is and to which demographics they are affordable	NCR The WNP2 Glossary provides a definition of affordable housing.
44	H1		133 new homes are being planned for, but what size increase in the local population is this allowing for and why and what additional services are being put in place to cater for this increase? .	NCR The increase in population addresses the recent reduction in population and to attract younger families.
30	Policy H1: Number of New Homes	Strongly agree		NCR
27	Policy H2 Tenancy Mix	Disagree	50% of affordable housing should be shared ownership to increase opportunities for people to get onto the housing ladder.	NCR This is determined by SODC housing policies

40	Policy H2:	Disagree	Would like shared ownership to be 50%	NCR This is determined by SODC housing policies
41	Policy H2	Disagree	Would like shared ownership to be 50%	NCR This is determined by SODC housing policies
42	Policy H2	Disagree	Would like shared ownership to be 50%	NCR This is determined by SODC housing policies
45	Policy H2	Disagree	50% of affordable housing should be Shared Ownership	NCR This is determined by SODC housing policies
27	Policy H3 Affordable Housing	Disagree	All sites with a net gain of 1 house should have to make a contribution towards affordable housing in an effort to bring down the number of people on the waiting list in the District.	NCR Woodcote Parish Council support the construction of more affordable homes, where appropriate, but note that development must be financially viable and that both national planning policy and the SOLP35 set the limit.
40	Policy H3	Disagree	Should be net gain of 1 house to help prevent overdevelopment of infill plots and also to help contribute to the need for affordable housing in the district.	NCR Woodcote Parish Council support the construction of more affordable homes, where appropriate, but note that development must be financially viable and that both national planning policy and the SOLP35 set the limit.
41	Policy H3	Disagree	Should be net gain of 1 house to help prevent overdevelopment of infill plots and also to help contribute to the need for affordable housing in the district.	NCR/PAC See response to the similar comment above (40).
42	Policy H3	Disagree	Should be net gain of 1 house to help prevent overdevelopment of infill plots and also to help contribute to the need for affordable housing in the district.	NCR/PAC See response to the similar comment above (40).

45	Policy H	Disagree	Should be net gain of 2 house to help prevent overdevelopment of infill plots and also to help contribute to the need for affordable housing in the district.	NCR/PAC See response to the similar comment above (40).
26	Policies H3-7	Agree	Agree with mix of housing - 133 is too many in my view	NCR Woodcote Parish Council have a duty to provide new housing under the provisions of the SOLP35. The NPPF requires that all plans for areas in AONBs must conserve and enhance the AONB hence Woodcote Parish Council has scrutinised every site offered to ensure that development complies with the SOLP35 whilst meeting the NPPF requirement with respect to the landscape of the AONB.
45	Policy H6 Type of Homes	Disagree	Housing mix should be a guide, but mix should be dictated by the need at the time of the application. Variations should be accepted if evidence to justify can be provided.	NCR/PAC
43	Policy H7 Size of Homes	Agree strongly,	Agree strongly, particularly to support downsizing	NCR
26	Policy H8	Disagree	Developments should be restricted to 20 houses max 30 too many	NCR Woodcote Parish Council acknowledge the strong preference in the community for new developments to be less than 25 new homes, but viability and efficient use of land require that in some circumstances a higher density is supported.
44	H9		Infill housing is there a limit on the number? Do these contribute to the 133 new homes - if not why not?	NCR WNP2 cannot place a limit on infill but it has been taken into

				account in the Housing Needs Assessment.
25	H10		(page 64) under Appendix C Summary of Policies re Backland dev, could we add definition as per Page 35 to make sure it is taken into account by the Appeal Inspector re future proposed developments (ref. The Hollies)?	CR The definition has been clarified.
43	Section 10.3	Agree strongly	Agree strongly with fewer house numbers proposed as long as it will not increase the likelihood of developers getting planning approval for more houses than on plan due to SODC wanting to hit its recommended target for the area	NCR
43	Section 10.7.	Agree strongly	Retirement Housing Provision Agree strongly, particularly sheltered accommodation	NCR

B-2.10 Comments on Section 11: Design Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
44	D	Agree	As part of it's environmental strategy the Government plans for all new build properties constructed from 2025 to 'zero carbon ready'. So all new builds must be made to adhere to higher environmentally sound construction methods.	NCR
34	Policy D1: Good Design	Agree	needs elaboration This policy is not working and needs review. "Wickets" and other developments are typically ugly Lower Earley style boxes.	NCR/PAC This policy supports the South Oxfordshire Design Guide and strengthens South Oxfordshire District Council's ability to ensure good design.
39	Policy D1	Agree		NCR
30	Policy D2: Light Pollution	Strongly agree	Light pollution deprives humans of dark skies and can prevent good sleep. It also causes behavioural disturbance to wildlife, disrupting their sleep (eg birds singing at night instead of resting), insects attracted to light instead of moving throughout the night to feed/breed, bright lights creating a barrier to the passage of nocturnal animals.	NCR
43	Policy D2: Light	Agree strongly		NCR
43	Policy D4:	Agree strongly		NCR

30	Policy D5: Sustain'ble Homes & Policy D6	Strongly agree	This at a minimum - new homes should ideally be "passive"	NCR
81	Section 11	Agree	It is good to see that design features are looking forward to features like electric charging points for households as well as small but important points like storage for waste bins and bicycles. As would be expected from the history of the village, building materials and designs will have to be appropriate for a Chilterns village.	NCR

B-2.11 Comments on Section 12: Development Site Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
44	HS	Agree	Ensure that property densities on each site are commensurate within an AONB. Also make sure that they follow the principles of existing developments ie green spaces eg Wayside Green, wide roads and pavements eg The Close, Bridle Path.	NCR Woodcote Parish Council support this view and believe that the updated Neighbourhood Plan responds to this.
15	Policy HS1 Site Allocations	Disagree	Too many houses proposed which could lead to traffic congestion.	NCR Woodcote Parish Council have studied all offered sites in order to meet the allocation of new homes in the SOLP35. In so doing the impact of traffic has been a significant consideration.
34	Policy HS1	Agree	Needs elaboration. I think all sites are "sensitive" and should be considered similarly with regards to landscaping, mitigation and sensitive built form	NCR
16	Policy HS2 WNP1-01	Disagree	Valued rural approach to village destroyed. Development is too large	NCR This site is an allocated site in the current, made, Woodcote

				Neighbourhood Plan and has planning permission.
14	Policy HS4 WPN 1-16	Disagree	Use of this site has already been abused by storing heavy earth moving machinery. At one point a park home development was refused. Both these acts put in question what care would be taken to protect the delicate aquifer and our ancient ponds. I think this site is unsuitable for housing and other community use should be made of it. Something for teenagers perhaps.	NCR This site is an allocated site in the current, made, Woodcote Neighbourhood Plan and is awaiting planning permission.
16	Policy HS4	Disagree	Proximity to historically significant ponds needs to be considered seriously who will take responsibility for monitoring this.	NCR This site is an allocated site in the current, made, Woodcote Neighbourhood Plan and is awaiting planning permission.
39	Policy HS5 WNP1-19	Disagree	By allowing building on these 2 sites (HS5 & HS10), you make it inevitable that the land between them and already the subject of building proposals will go ahead on appeal. The views along this valley must be retained. But by allowing these 2 areas to be developed you have sealed its fate!	NCR HS5 is an allocated site in the current, made, Woodcote Neighbourhood Plan. The land between HS5 and HS10 is not assessed as meeting the conditions allowing development in an AONB, an assessment supported by the refusal of planning permission for this site in 2017, and is unlikely, therefore, to be developed. In addition, WNP2-33 (HS10) has subsequently been withdrawn by the new owners.
47	Policy HS5	-	Smallholding – this should remain so as yet again we are slowly losing village status and becoming more of a large housing estate – A village needs animals, grazing, paddocks to keep its identity and to help keep its residents minds and bodies healthy.	NCR This site is an allocated site in the current, made, Woodcote Neighbourhood Plan.
48	Policy HS5	-	Smallholding – this should remain so as yet again we are slowly losing village status and becoming more of a large housing estate – A village needs animals, grazing, paddocks to keep its identity and to help keep its residents minds and bodies healthy.	NCR This site is an allocated site in the current, made, Woodcote Neighbourhood Plan.

89	Policy HS5	Disagree	Poor visibility when leaving Beech Lane, potential accident area. Drainage is poor in Wood Lane.	NCR This site is an allocated site in the current, made, Woodcote Neighbourhood Plan.
24	Policy HS6 WNP2-02	Disagree	Access to and from this site is inadequate for the anticipated increase in traffic volumes	NCR The location of the entrance/exit to the site provides clear visibility in both directions. Woodcote Parish Council also note that OCC Highways, in their review of WNP2 raised no objection.
45	Policy HS6	Disagree	Object to the inclusion of this site with the access on this tight corner of Behoes Lane. Object to the fact that this site will not be contributing towards affordable housing need in the District.	NCR The location of the entrance/exit to the site provides clear visibility in both directions. Woodcote Parish Council also note that OCC Highways, in their review of WNP2 raised no objection. Woodcote Parish Council do not wish to make small sites that can be developed without harm to the AONB unviable.
47	Policy HS6		The land at yew tree farm house, beech lane/behoes is on the same line as area 8, 9, 10 on map figure 9.iii so should be also included as a piece of land with valued local views in an aonb. WNP2.02 – the amount of land remaining is referred to as being left as a paddock – this is not large enough to be considered suitable as a paddock – horses/ponies are pack animals and should live as such to keep their mental health from deteriorating.	NCR The owner of this land has decided on the amount available for new homes and the amount to remain as a paddock. Views into the site were considered as part of the site assessment and, in the absence, of public viewpoints no

				significant loss of views identified.
48	Policy HS6		The land at yew tree farm house, beech lane/behoes is on the same line as area 8, 9, 10 on map figure 9.iii so should be also included as a piece of land with valued local views in an aonb. WNP2.02 – the amount of land remaining is referred to as being left as a paddock – this is not large enough to be considered suitable as a paddock – horses/ponies are pack animals and should live as such to keep their mental health from deteriorating.	NCR The owner of this land has decided on the amount available for new homes and the amount to remain as a paddock. Views into the site were considered as part of the site assessment and, in the absence, of public viewpoints no significant loss of views identified.
84	Policy HS6	Agree	Limited access but no visual impact.	NCR
89	Policies HS6 & HS7 WNP2-02 & WNP2-03	Agree		NCR
22	Policies HS6 & HS7	Disagree	less housing = less congestion road too narrow	NCR The capacity of the road (Behoes Lane) was considered during the assessment of these sites and considered adequate. OCC Highways have reviewed WNP2 and raised no objection to these sites.
24	Policies HS6 & HS7	Disagree	Access to and from this site is inadequate for the anticipated increase in traffic volumes	NCR The capacity of the road (Behoes Lane) was considered during the assessment of these sites and considered adequate. OCC Highways have reviewed WNP2 and raised no objection to these sites.

89	Policies HS6 & HS7	Agree		NCR
45	Policies HS6 & HS7	Disagree	Object to the inclusion of this site with the access on this tight corner of Behoes Lane. Object to the fact that this site will not be contributing towards affordable housing need in the District.	NCR The capacity of the road (Behoes Lane) was considered during the assessment of these sites and considered adequate. OCC Highways have reviewed WNP2 and raised no objection to these sites. Woodcote Parish Council do not wish to make small sites that can be developed without harm to the AONB unviable.
47	Policy HS7 WNP2-03		WNP2.03 – g. the existing paddock and smallholding area is only just large enough at its present size for three horses. The proposed development on over half the paddock area would not be suitable for horses as they are pack animals and suffer mental health problems/depression when living on their own. WNP2.02 is not owned by the same people so the undeveloped part of land cannot be classed as paddock attached to WNP2.02 without a formal agreement being put in place.	NCR The owner of this land has decided on the amount available for new homes and the amount to remain as a paddock. Views into the site were considered as part of the site assessment and, in the absence, of public viewpoints no significant loss of views identified. Woodcote Parish Council is aware that the sites are owned by different people but have received assurances that this will not impede development.
48	Policy HS7		WNP2.03 – g. the existing paddock and smallholding area is only just large enough at its present size for three horses. The proposed development on over half the paddock area would not be suitable for horses as they are pack animals and suffer mental health problems/depression when living on their own. WNP2.02 is not owned by the same people so the undeveloped part of land	NCR The owner of this land has decided on the amount available for new homes and

			cannot be classed as paddock attached to WNP2.02 without a formal agreement being put in place.	the amount to remain as a paddock. Views into the site were considered as part of the site assessment and, in the absence, of public viewpoints no significant loss of views identified. Woodcote Parish Council is aware that the sites are owned by different people but have received assurances that this will not impede development.
81	Policy HS7	Agree	Very glad to see the green spaces built into the plan for the part of the site behind the six houses on Beech Lane. Without it the scheme would be most intrusive on those people. It is essential that it is maintained when detailed planning permission is sought.	NCR
84	Policy HS7	Agree	Limited access but no visual impact.	NCR
27	Policy HS8 WNP2-09	Disagree	Conversion of these offices to residential, which is one of the furthest points outside of the village facilities will only result in more car use into the village. It will also take away employment use and office space from the village.	NCR There is no demand for these offices and an application for prior approval for the proposed change of use from Class B1(a) (offices) to Class C3 (residential) (2 flats) was submitted in July 2021.
84	Policy HS8	Agree	The proposed conversion of offices to flats would appear to be sensible if there is not any case for their present usage. The building structure is already in place and is tucked away.	NCR
89	Policy HS8	Agree		NCR
95	Policy HS8	Disagree	Keep the offices. I object to this proposal for the following reasons: This development was always part of the long-term plan by the developers. They are manipulating the neighbourhood plan for their own profit turning a brown site into residential. The offices are for local businesses as agreed on the original plan to encourage employment within Woodcote and local villages. The owners have deliberately made these offices unsuccessful to support the conversion. The owners have no respect for planning permission or the neighbourhood plan. They currently have tenants living in at least one of the units and have done for over a year!! This has been reported	NCR There is no demand for these offices and an application for prior approval for the proposed change of use from Class B1(a) (offices) to Class C3 (residential)

			to SODC which has currently not changed the situation. Flats in this location would harm the character of the perimeter of the village affecting neighbours privacy and quality of life. The noise from day to day occupation would become a nuisance. Car parking at the site would be inadequate for the number of flats proposed. The road cannot handle on road parking creating a blind spot at a dangerous junction posing a road safety hazard. Pavements and street lighting are inadequate for increased residents. Beechwood Court is within a designated area of outstanding natural beauty which is being polluted with an unproportionate influx of development and should be reviewed with the additional 20 homes on the former reservoir site on Greenmoor. Enough is enough!!	(2 flats) was submitted in July 2021.
16	Policy HS9 WNP2-30	Disagree	Development too large and a car park goes against sustainability goals. Need to encourage people to walk to school.	NCR This number of dwellings allocated to this site derive from the need to make efficient use of land whilst providing adequate green space within the site with a density appropriate to the edge of a village in the AONB. The car park is to remove the parked vehicles from the roadside by the schools. These vehicles are largely those of school staff and create both congestion and hazard to road users and pedestrians.
22	Policy HS9	Disagree	too congested suggest less housing	NCR This number of dwellings allocated to this site derive from the need to make efficient use of land whilst providing adequate green space within the site with a density appropriate to the edge of a village in the AONB. users and pedestrians.

24	Policy HS9	Disagree	Access to and from this site is onto what is one of the busiest roads into and out of the village	<p>NCR</p> <p>The car park is to remove the parked vehicles from the roadside by the schools. These vehicles are largely those of school staff. Removing the parked vehicles will reduce both congestion and possible problems of traffic entering or exiting this site.</p> <p>Woodcote Parish Council note that OCC Highways raised no objections when reviewing the proposed allocation.</p>
28	Policy HS9	Disagree	<p>We feel that 30 houses on this site is far too many. Given the congestion already identified on Reading Road, this proposed development may well worsen the situation, albeit with a car park.. Our concern is that the car park will be of insufficient size, and it's mere existence does not mean it will be used, particularly for dropping of and picking up pupils, meaning increased hazards. Reading Road is, by far, the most used route into and out of the village and at the morning peak hour, we are of the opinion that exiting onto the A4074 is likely to mean long tailbacks.</p> <p>We would like consideration be given to identifying an alternative site for this number of units away from Reading Road, to a location that does not have such a major impact on access road(s) to the site.</p>	<p>NCR</p> <p>The car park is to remove the parked vehicles from the roadside by the schools. These vehicles are largely those of school staff. Removing the parked vehicles will reduce both congestion and associated hazard to road users and pedestrians.</p> <p>Woodcote Parish Council note that OCC Highways raised no objections when reviewing the proposed allocation.</p> <p>All potential sites have been assessed and there is no other alternative site that could accommodate this number of houses without a significant impact on the AONB.</p>
40	Policy HS9	Agree		NCR

41	Policy HS9	Agree		NCR
42	Policy HS9	Agree		NCR
84	Policy HS9	Disagree	Church Farm, Reading Road. Reading Road has always been identified as a "hot spot" for traffic congestion. We will soon be experiencing further traffic congestion from developments of WNP1-01 and WNP1-02. The proposed developments at Church Farm can only compound congestion with movement of at least 60 cars plus other vehicle movements to these two properties. The idea of a public car park at location WNP2 being built will not help the situation. We know from human behaviour that parents dropping off or collecting their children will still continue to park along Reading Road out of convenience. As an alternative for a car park why hasn't land belonging to Langtree School, with access from Greenmoor been considered? There is adequate space there without encroaching on the playing fields. The visual aspects of the proposed sites would have a detrimental and harmful impact on the area which lies within an AONB. As we understand it, the plan sets out to protect the village's rural surroundings, to preserve local green spaces and wild life and maintain rural feel of the village. These two sites would contradict this.	NCR The car park is to remove the parked vehicles from the roadside by the schools. These vehicles are largely those of school staff. Removing the parked vehicles will reduce both congestion and associated hazard to road users and pedestrians. Woodcote Parish Council note that OCC Highways raised no objections when reviewing the proposed allocation.
87	Policy HS9	Disagree	Yellow lines alongside Greenmore Road to prevent parking	NCR Currently there is no alternative to parking on the Reading Road and Greenmore. Once the car park is operating the Parish Council will approach OCC with the aim of installing parking controls on these roads.
89	Policy HS9	Agree		NCR
90	Policy HS9	Disagree	The Reading Road is already problematic esp. at school collection time, and I am not convinced a public car park will alleviate this added strain enough.	NCR The car park provides some 40 spaces to remove the parked vehicles from the roadside by the schools. Current checks indicate that this is far more than the number of vehicles parked on the road during the school day.

92	Policy HS9	Disagree	The current situation along Reading Road, with car parking, buses to Reading & Oxford, buses to Langtree School, access to Village Hall, Garden Centre and Londis is an accident and/or fatality waiting to happen. A further 30 houses with cars will make the situation far far worse, even with the proposed additional possibility of car parking spaces. This is the busiest and most congested part of the village. A development such as this makes no sense at all. The alternative would be Bouchier Fencing, previously identified. While they may not wish to develop immediately there is considerable time for this to take place , ie into the 2030s	NCR The Plan acknowledges the current problems of congestion and proposes this car park as alternative parking for the vehicles, largely owned by school staff, currently parking at the roadside. Buses and the additional vehicles using the development alongside will then benefit from uncongested roads at this point. The Bouchier site has been withdrawn by the owner.
45	Policy HS10	Disagree	4 homes is over development of the site given Beech Lane is single track with no pavement. Already significant infill on this road. Object to the fact that this site will not be contributing towards affordable housing need in the District. Site should not be included in allocations.	NCR/PAC Woodcote Parish Council note that South Oxfordshire District Council raised no objection to this allocation when reviewing the proposed allocation. In addition, WNP2-33 (HS10) has subsequently been withdrawn by the new owners.
89	Policy HS10	Agree		NCR WNP2-33 (HS10) has subsequently been withdrawn by the new owners.
27	Policy HS10	Disagree	4 houses would be over development of the site, on a road where there is not a single foot path. There is not even space for 2 cars to pass and limited passing spaces due to stones, posts and bits of wood put on verges by residents to prevent parking.	NCR/PAC Woodcote Parish Council note that South Oxfordshire District Council raised no objection to this allocation when reviewing the proposed allocation.

				In addition, WNP2-33 (HS10) has subsequently been withdrawn by the new owners.
44	ES	Agree		NCR
89	Policy ES1 WNP2-43A	Agree		NCR
37	Policy ES2 WNP2-25	Disagree	I think the development would be better on the North side of the existing units, as this would have far less visual impact at this key part of the village.	NCR The land to the north side has not been made available by the landowner.
39	Policy ES2	Disagree	To allow this to be built up will see very high barn like buildings being erected here. The views will be gone forever. Land should be used at the rear of the Church Farm site. This "employment" use land will be quickly converted into residential use as we have seen elsewhere.	NCR The land to the north side has not been made available by the landowner.
40	Policy ES2	Agree		NCR
41	Policy ES2	Agree		NCR
42	Policy ES2	Agree		NCR
84	Policy ES2	Disagree	Church Farm, Reading Road. Reading Road has always been identified as a "hot spot" for traffic congestion. We will soon be experiencing further traffic congestion from developments of WNP1-01 and WNP1-02. The proposed developments at Church Farm can only compound congestion with movement of at least 60 cars plus other vehicle movements to these two properties. The idea of a public car park at location WNP2 being built will not help the situation. We know from human behaviour that parents dropping off or collecting their children will still continue to park along Reading Road out of convenience. As an alternative for a car park why hasn't land belonging to Langtree School, with access from Greenmoor been considered? There is adequate space there without encroaching on the playing fields. The visual aspects of the proposed sites would have a detrimental and harmful impact on the area which lies within an AONB. As we understand it, the plan sets out to protect the village's rural surroundings, to preserve local green spaces and wildlife and maintain rural feel of the village. These two sites would contradict this.	NCR The car park is to remove the parked vehicles from the roadside by the schools. These vehicles are largely those of school staff. Removing the parked vehicles will reduce both congestion and associated hazard to road users and pedestrians. In addition, Woodcote Parish Council note: i. the very low level of traffic movements into and out of the industrial units; and ii. that OCC Highways raised no objections when reviewing the proposed allocation.

92	Policy ES2	Disagree	The current situation along Reading Road, with car parking, buses to Reading & Oxford, buses to Langtree School, access to Village Hall, Garden Centre and Londis is an accident and/or fatality waiting to happen. A further 30 houses with cars will make the situation far far worse, even with the proposed additional possibility of car parking spaces. This is the busiest and most congested part of the village. A development such as this makes no sense at all. No alternative.	NCR The car park is to remove the parked vehicles, largely those of school staff, from the road and thus remove the source of the current congestion. In addition, Woodcote Parish Council note: i. the very low level of traffic movements into and out of the industrial units; and ii. that OCC Highways raised no objections when reviewing the proposed allocation.
27	Policy ES3 WNP2-98	Agrees	With Provisions. Only agree with this if it removes all the parking off Greenmore.	NCR
39	Policy ES3	Agree	But the new area needs to have its correct usage enforced	NCR
84	Policy ES3	Agree	If it is only a car park.	NCR This policy provides new local employment space together with a car park sufficiently large to contain the cars, largely owned by those working on the industrial site, currently parked on the roadside and those of customers and suppliers to the existing and proposed units.
87	Policy ES3	Disagree	Yellow lines alongside Greenmore Road to prevent parking	NCR/OPS
89	Policy ES3	Agree		NCR
13	Section 12	Disagree	I would like to raise the point, for public review and discussion, for an alternative to the proposed plan that can offer Woodcote a very different and hopefully preferable long-term decision for the village. As it stands, the plan is offered as a fait accompli. The target 133 houses have been distributed to the 'allocated' sites, and the proposal is take it or leave it - there are no real alternative plans on offer. I disagree with this part of the process as I think that alternative	NCR Woodcote Parish Council are grateful for this submission and note the comments.

		<p>strategies should be given more consideration, then allow residents to weigh up the best strategic option for the future. The proposed plan as it stands, stuffs houses in amongst the fabric of the village wherever there is an available plot of land. This policy delivers houses - but at the cost of local crowding, and removing some of the essence of what Woodcote is - ie a semi-rural traditional 'village' with the feeling of close proximity to the countryside. Plenty of people I have spoken to say they do not like it when houses are stuffed in wherever they can be as this detracts from the open feel and traditional nature of the village - the very reason they moved here. This is an important point and should be given much more consideration in the planning process. One alternative would be to drop the policy to embed new houses into the existing village, but develop them in a larger plot, adjacent to the village, in a similar manner to the developments in Wallingford. For example, the land around WNP1-01/02 and between Tidmore Lane and the A4074 could receive a significant number of houses, and be developed in a cohesive single plan with the future in mind. This allows a proper strategic expansion of the village. Compared to the current plan, such an alternative proposal could offer: Better access (car and public transport) to the A4074 + Reduced traffic impact to the existing village + Eliminate overdevelopment in the existing village + Allow a 'model village' design to be implemented, with better allowances for present, and future requirements. + Allows the Reading road area to be developed in a better way, with enough off street parking to deliver a clearway, and opportunities for further retail/commercial developments to strengthen the 'village centre' + Enables commercial developments close to, or along the A4074 + Much less impact to the existing village and its residents. This village has an opportunity to develop a much better legacy planning decision than simply achieving the numbers and I urge the Parish Council to at least table such an alternative plan.</p>	<p>The update to the Woodcote Neighbourhood Plan is now too advanced to consider a revision on the scale approached even if some of the suggestions were possible given the policy requirements of the NPPF and SOLP35.</p> <p>Work on a new Local Plan is expected to begin soon and thus work on a new Neighbourhood Plan (WNP3). Woodcote Parish Council suggest that early participation in the production of WNP3 will enable the suggested approach to be considered.</p> <p>The site suggested for a larger scale development was included in all consultations and received no support from residents.</p>
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B-2.12 Comments on Section 13: Our Village – Our Future

Responder	Section / Policy	Agree/ Disagree	Comment	Plan Response
81	Section 13.1	Agree	I recommend that Parish Council accept i) to vi). It is good to see a widening approach to village needs, but it is concerning that the new working groups will need to work fast so that their recommendations can be implemented with the plan.	NCR

B-2.13 General Comments

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
1	General		Despite the issues regarding the GP practice, an increase in the number of houses in Woodcote would be beneficial as it would help to lower house prices which would surely be a positive move. It's hard not to see your response as a classic case of 'we need more housing but not here please'.	NCR
3	General		<p>I'm very impressed with the amount of work which has been carried out and documented, many thanks.</p> <p>I cannot claim to have read everything, but have hopefully dipped and found most relevant parts as far as I'm concerned.</p> <p>It is unfortunate, but probably ineluctable, that the sites suggested should essentially be on the periphery of the village, but this does mean that the non-use of motor vehicles is unlikely to be favoured by new residents when moving within the village or when potentially considering taking public transport.</p> <p>I am in favour of the bands/strips of green space to screen/hide new developments, however what legal protection will the vegetation thereof have and, furthermore, where will the ownership of these bands/strips of green space lie?</p> <p>I'm somewhat concerned about the 3 proposed sites proposed which, either immediately or eventually, debauch onto Beech Lane, Insofar as the most-obvious route for most motor vehicles will definitely/probably lead through the Beech/Behoes Lanes junction, which is not a happy thought if the relatively-low numbers of properties being considered should be exceeded in any way.</p>	<p>NCR</p> <p>Woodcote Parish Council agree that the location of sites on the edge of the village, with the consequent incursion into, and loss of greenfield sites in, the AONB, is unfortunate but given the lack of undeveloped land within the developed area this is a direct consequence of working to support the allocation of new homes to the village by South Oxfordshire District Council.</p> <p>These mitigating features will be conditions applied to the development when planning permission is granted. At that time the legal agreement will identify the ownership of the features.</p> <p>The location of the entrance/exit to the site provides clear visibility in both directions.</p>

				Woodcote Parish Council also note that OCC Highways, in their review ofWNP2 raised no objection.
4	General		I am worried that the sites are a long way from the bus and the shops. ia m worried that there will be too many more houses on the Behoes/Beech Lane sites for the junction.	NCR All sites have been assessed against reasonable walking distances to shops, bus stops and other village services against nationally accepted standards The location of the entrance/exit to the site provides clear visibility in both directions. Woodcote Parish Council also note that OCC Highways, in their review ofWNP2 raised no objection.
8	General		We both agree with all aspects of the Woodcote Neighbourhood Plan.	NCR
12	General		I am impressed with the opportunity for residents to comment and the quality of the data supporting the plan.	NCR
15	General		Whilst I'm happy that measures have been taken to reduce the parking issues on Greenmore and Reading Road, will there be sufficient traffic calming measures put in place to reduce potential speeding incidents in these places after the parking issues are resolved?	NCR/OPS
16	General		I think the overall aims of the plan are very good. However this is contradicted by the proposed developments within the village and the lack of certainty that local residents will be offered a chance to become homeowners of the said housing developments. More information is required regarding this and the information needs to be made freely available. This is more important than a glossy leaflet outlining the next stage of the plan. Local residents need a chance to buy/rent these properties.	NCR
18	General		All seems good. As the village population expands, I wonder if our facilities such as the Heath Centre and Village Hall will need to update. Existing car parking is a growing problem and is positively dangerous at the junction of Greenmore and Reading Road at School time, additional	NCR/OPS

			parking as planned can't come soon enough. Thanks to all those involved with the update.	
21	General		I think the choices made are the most appropriate ones and ensure development will make minimal impact to what makes our village special	NCR
22	General		All the rest, ok as long as we receive the extra transport facilities - buses - bus stops {nearer A4074 } & regularly maintained footpaths & roads without potholes. More police presence will be required @ all times not just passing through police traffic.	NCR/OPS
24	General		Generally, we are in favour of the plan and understand the underlying need for us to have this in place, but as discussed in the Zoom meeting we joined in with, we are very concerned that the roads within Woodcote will become choked with more traffic, leading to more frustrated drivers, thus faster traffic and more risks being taken. If all goes ahead as currently planned there are several well-known road junctions that will require adjustment in order to allow traffic to flow safely, not an easy problem to address without major investment from OCC Highways, perhaps some more of the developers levy could be diverted back into a project like this? We feel that we as a community are being forced into a major building programme with, it appears, little help from OCC to address the obvious knock-on effect of more congestion on our under-developed lanes.	NCR/OPS
25	General		Very comprehensive and all the work that goes into the WNP is much appreciated.	NCR
26	General		Infill needs restrictions too many awful properties in back gardens not big enough for them The site by the ponds is an absolute eyesore why don't you move coop there rather than build 20 houses there's? If not returning it to nature is far best option. I hate all the new houses they are ugly and too expensive	NCR/PAC Woodcote Parish Council are sympathetic to this concern about over-development of infill sites but note that over-development will be refused by South Oxfordshire District Council when the planning application is considered. The Coop cannot be moved to the site suggested because: i. the Coop will not agree to this; and ii. the landowner will not agree to this. In addition, it will relocate the Coop to a less central position

				creating difficulties for those with mobility problems from the opposite side of the village.
27	General		<p>Pity we have lost the post office in the village but understand that is not something that can be controlled.</p> <p>There are on occasions problems with anti-social behaviour in the village – particularly in the village hall car park but I know you are going the best you can to address it. The addition of the car park lights and reduction of hedge height to make the area more visible and feel safer was a great step in helping to combat.</p> <p>There is frequent moaning from certain quarters about there being 'nothing' for the youth to do and that somehow is supposed to excuse bad behaviour. However, I'm of the opinion that there are some facilities for the youth of the village, including the recent addition of a 2nd basketball / football goal. While consultation on future facilities would be a good thing, so would said people that complain offering to take part in some fundraising to contribute.</p> <p>Sad to see developments where one house is demolished and more literally crammed in. It makes for poor housing in terms of amenity and parking provision. Whatever happened to the Chiltern Design Guide, as some of the recent developments certainly don't fit in in terms of appearance. Would like to see Reading Road lined with double yellow lines.</p>	NCR/OPS
28	General		<p>It is very unfortunate that in recent years bungalows in the village have been developed into houses, reducing the stock of such accommodation. Developments, therefore, should prioritise, not only suitable and affordable properties for our younger residents, but also, a significant number of single storey ones for those increasing older members of the community, where demand is almost certainly going to increase between now and 2035.</p>	<p>NCR</p> <p>Woodcote Parish Council agree with these comments and policies in the update to the Woodcote Neighbourhood Plan include:</p> <ul style="list-style-type: none"> i. A housing mix tailored to smaller homes more suited to young people; and ii. the conversion of unused, unwanted office space at Beechwood Court into homes suitable for downsizing into.
30	General		<p>I would like to congratulate the team of people who have worked on the Neighbourhood Plan for their public engagement and hard work which has resulted in the production of such a thorough document. Thank you.</p>	NCR

31	General		Overall I'm ok with the plan if we must build houses in Woodcote. However I think it is very short sighted to be building on green fields in an AONB. It is detrimental to the rural feel of the village and detrimental to wildlife. Traffic will increase too. This really must be the last lot of house building in Woodcote ever. The only people who benefit are greedy landowners and developers	NCR
32	General		Woodcote is part of - and not simply surrounded by - the Chilterns AONB. It is also unique among the local villages in its situation at the top of the Chiltern escarpment and, at the same time, overlooking the Thames Valley. We should therefore be especially aware of the unique environmental impacts (both in the form of structures and of light pollution) that any further development would have. Such impacts would affect not simply the village itself or its immediate vicinity, but also the panoramic view of the face of the Chilterns from the Wessex Downs AONB and the Thames Valley below us.	NCR
33	General		Tverc biodiversity information is by no means comprehensive - which they acknowledge. Absence of data does not mean absence of species. Local naturalists have much more detailed and up-to-date information.	NCR TVERC data has been supplemented by an ecology report for allocated sites has been produced by Ecology by Design, a company of chartered landscape specialists.
34	General		Overall many thanks to the core team putting this together - a great plan that enables sustainable development in the right places but acknowledges that we are custodians of a very precious AONB landscape that needs to be preserved for future generations, in spite of the pressure applied by land owners and developers to cash in.	NCR
37	General		The plan is an excellent document and clearly very well thought out. I would like to see a really bold green energy initiative involving a local levy by the Parish Council and / or national and private involvement. This could include, solar, wind and geothermal energy initiatives and incentives to convert gas boilers to deep ground sourced heating. The improvement of wildlife corridors and biodiversity generally requires an overview including the whole parish, e.g. to reduce excessive mortality on our roads. Finally, I don't think any of the proposed parking improvements will be enough, but more especially at the reservoir site.	NCR/OPS
39	General		You have shown a map of the Developed/Settlement area of Woodcote - but this is not a true representation of the current Developed/Settlement area, but is instead shows the proposed greenfield fields as part of the Developed/Settlement area. At the very least this is mis-leading.	NCR The boundary must include the planned development sites to avoid the plan immediately becoming out of date and rendering the policy ineffective.

			Overall this is a good plan and shows a lot of hard work has gone into it. But I cannot agree with the increased concentration of sites in the Beech Land and Wood Lane areas when other areas of the village have come out of it without any land to be developed e.g. South Stoke Road	The sites proposed for development are the result of detailed studies that gave the required 'great weight' to the conservation and enhancement of the AONB. The sites mentioned are among those assessed, primarily, as meeting both national and district planning policies and local needs such as the impact on the roads and proximity to essential services.
44	General		The over-riding factor must be that the integrity of the AONB is not further compromised than it already has been. Nationally the 'fall-out' from Brexit and COVID is not yet clear and will not be for years to come so all planning made prior to these events is going to have to be re-visited. Are there going to be systems in place to follow up on infringements or to make sure the principles in these policies are maintained?	NCR/OPS
45	General		Policy D4: Renewable Energy – Disagree – Not all properties, locations are suitable for panels – such as listed buildings, different roof types, shaded areas. Requirement for all new development to include solar photovoltaic panels and/or solar water heating panels is excessive. Plus, not all houses may be aligned appropriately due to site restrictions. Suggest Local Plan Policy DES10: Carbon Reduction provides sufficient requirement for provision for renewable energy in new developments. Policy D5: Sustainable Homes – Disagree. Not all houses may be aligned appropriately due to site restrictions.	NCR Woodcote Parish Council strongly support South Oxfordshire's recognition that the climate and ecological crises are the greatest challenges facing our society and their consequent: <ul style="list-style-type: none"> • declaration in February 2019, of a climate emergency; and • goal of becoming a carbon neutral district by 2030

				<p>Homes are responsible for some 18% of CO₂ emissions¹¹. This policy:</p> <ul style="list-style-type: none"> i. responds to the strongly expressed wish of residents of Woodcote to reduce the community's carbon footprint. ii. relates strongly to the District Council's priority theme 3 (Action on climate emergency); iii. supports the SOLP35 which notes that 'The design and construction of new developments and refurbishments to existing buildings can have a significant role in helping to reduce carbon emissions'; iv. supports policy DES9 Renewable and Low Carbon energy; and v. supports policy DES10 Carbon Reduction
46	General		<p>I represent myself Gerald and my wife Christine. We have lived in Woodcote for many years and have been very happy. We feel that many issues that have come to light over the years have been dealt with sympathetically and generally to the benefit of most of the residents. We were pleased with the results of the first Woodcote Neighbourhood Plan and certainly endorse all the proposals put forward by the committee for the Woodcote Neighbourhood Plan 2 (WNP2).</p>	NCR
47	General		<p>Wnp2.02 AND wnp2.03 are both undeveloped pieces of land used for stabling and paddocks and on an upward gradient from Beech Lane towards 'the view'. Any development would need to take this into account so the new properties on WNP2.02 and WNP2.03 are not over imposing. Woodcote is a village with good, new, equestrian facilities and requires paddocks/stabling for</p>	<p>NCR Woodcote Parish Council have subjected all offered sites to detailed scrutiny and are</p>

¹¹ Carbon Footprint: Exploring the UK's contribution to climate change WWF March 2020

			horses/ponies to remain local in order to minimise the environmental impact of transporting horses by road to competitions/practice sessions and horse owners in Woodcote having to travel at least twice a day to care for their animals.	content that these sites meet both national (NPPF) and district planning requirements. The Parish Council is pleased to see the new equestrian facilities but cannot dictate to the owners of sites WNP2.02 and WNP2.03 how they use their land.
48	General		Wnp2.02 AND WNP2.03 are both undeveloped pieces of land used for stabling and paddocks and on an upward gradient from Beech Lane towards 'the view'. Any development would need to take this into account so the new properties on WNP2.02 and WNP2.03 are not over imposing. Woodcote is a village with good, new, equestrian facilities and requires paddocks/stabling for horses/ponies to remain local in order to minimise the environmental impact of transporting horses by road to competitions/practice sessions and horse owners in Woodcote having to travel at least twice a day to care for their animals.	NCR Woodcote Parish Council have subjected all offered sites to detailed scrutiny and are content that these sites meet both national (NPPF) and district planning requirements. The Parish Council is pleased to see the new equestrian facilities but cannot dictate to the owners of sites WNP2.02 and WNP2.03 how they use their land.
49	General		The NP is well thought out and should provide a useful tool to manage development in the village in future years.	NCR
81	General		Thorough research, careful analysis and farsighted planning have led to a neighbourhood plan of which Woodcote should be proud. The advising group have laid out a future for the village both sustainable and enhancing its assets. We, as residents, are most grateful. It is most important that the number of new homes is kept down to a level that will not damage the village but will provide for the needs of the village population in the future.	NCR
90	General		I think most of the sites have been well thought out and will have relatively little impact on the visual aspect of the village. But of course, that many more inhabitants will certainly impact the village infrastructure. How will the schools cope, and the heath centre?	NCR/OPS

Appendix B-3 Individuals not resident in the Parish

This appendix contains a full list of the responses received from individuals not resident in the parish. In the list:

- i. respondents are identified by a unique number¹². Each comment can thus be mapped back to the original submission using the comment number.
- ii. comments are mapped to the appropriate section of WNP2 for easier analysis.

In reviewing the comments, the Parish Council use the following codes:

- **NCR** No Change Required because, for example, the comment is supportive of a policy, statement or other part of the Plan;
- **NCR/OPS** No Change Required because the comment is on matters that fall outside the scope of a Neighbourhood Plan;
- **NCR/PAC** No Change Required because the comments apply to matters dealt with when a planning application is being considered by the Local Planning Authority;
- **CR** Change Required

Where helpful or necessary the decision is explained with added commentary. Note that the consultees' comments often refer to paragraphs in the 2019 issue of the NPPF, the plan responses refer to the equivalent paragraphs in the 2021 issue of the NPPF.

Where a reference is made to an accompanying representation the comments and Parish Council response can be found in Appendix B-4.

B-3.1 Comments on Section 2: Process Summary

No Comments

B-3.2 Comments on Section 3: Goals and Objectives

No Comments

B-3.3 Comments on Section 4: Woodcote – Our Village

No Comments

B-3.4 Comments on Section 5: Neighbourhood Plan Policies

No Comments

B-3.5 Comments on Section 6: Community Well-Being Policies

No Comments

¹² A full list of respondents is available.

B-3.6 Comments on Section 7: Traffic and Transport Policies

No Comments

B-3.7 Comments on Section 8: Employment and Skills Policies

No Comments

B-3.8 Comments on Section 9: Countryside and Environment Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
35	E6	Disagree	Views 1 and 2 are compromised by rundown buildings and tree lines obscuring the views from the higher ground, there are more important views over the Wessex Downs and Goring. All of Woodcote is in the AONB so this is not a valid reason for exclusion and should be removed.	NCR Woodcote Parish Council agree that there are important views towards the Wessex Downs, but this does not mean that other valued views should be ignored.
97	E6	Disagree	Views 1 and 2 are not attractive AONB views, they are run-down equestrian facilities (those at 16 Bridle Path are owned by my family). It should be noted that all of Woodcote is in the AONB, so to exclude this site from the plan because of this means that there should be no further building in the village at all!	NCR Woodcote Parish Council disagree. Allocations in this updated Neighbourhood Plan demonstrate that there are locations where development will not damage the AONB. The Parish Council notes that repeated applications to develop this site have been refused by South Oxfordshire District Council for reasons that include an unacceptable impact on the AONB.

B-3.9 Comments on Section 10: Housing Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
29 Landowner	Policy H1	Disagree	<p>The level of development proposed is inadequate and does not address the need identified by the Adopted SODC Local Plan. The policy wording should be amended to increase the level of development to 225 dwellings. In line with National Guidance, the WNP2 should allocate the minimum housing requirement as set by Policy H4 of the SODC Local Plan.</p> <p>Please see accompanying representation for further detail.</p>	<p>NCR Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB.</p>
35 Landowner	H1	Disagree	<p>The SODC Local Plan (LP) has 225 house allocated to Woodcote. The allocations in the WNP2 are very short of this number and do not meet the LP's needs. Also the National Planning Policy Framework states that "Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies". The WNP2 is in breach of this guideline and is not following the rules that it should.</p>	<p>NCR Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB.</p> <p>Woodcote Parish Council is aware of paragraph 29 of the NPPF but notes that (paragraph 11) when plan making, strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses unless (sub-paragraph (b i) the application of policies in this Framework that protect areas of particular importance provides a strong reason for restricting the overall scale,</p>

				type or distribution of development in the plan area: AONBs are specifically identified as an area of particular importance.
97 Landowner	H1	Disagree	Insufficient justification has been provided for deviating from the number of houses allocated to Woodcote in the SODC LP. This was 225, and the allocations in WNP2 fall a long way short of this., In addition, the National Planning Policy Framework states that "neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies"	NCR Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes allocated is the number that can be provided without causing unacceptable damage to the AONB.
29 Landowner	Policy H8	Disagree	This policy proposed an artificial limit on housing numbers on any one site. This will greatly affect and limit the level of affordable housing that can be provided within the village. Limiting the scale of development on each site also results in more sites required for allocation and less for infrastructure provided to meet the needs of the development and the community. Please see accompanying representation for further detail.	NCR Woodcote Parish Council acknowledge the strong preference in the community for new developments to be less than 25 new homes, but viability and efficient use of land require that in some circumstances a higher density is supported.
35 Landowner	Policy H8	Disagree	This means more smaller sites are required to meet planning numbers, and therefore less affordable houses can be provided (an H4 requirement) and less money is generated for the local area infrastructure which could be generated by bigger development sites (section 6.6)	NCR The updated WNP2 must balance the conflicting requirements of national planning policy which both require plans to conserve and

				enhance the AONB and require evidence of an exceptional need to justify major development in an AONB with the short-term financial benefit to a community who, repeatedly, in surveys express very strong preferences for sites of 25 new homes or fewer.
97 Landowner	Policy H8	Disagree	This means that more sites are required to meet the housing numbers, less affordable housing can be provided (a requirement in H4), and less money available to improve infrastructure (section 6.6).	NCR The updated WNP2 must balance the conflicting requirements of national planning policy which both require plans to conserve and enhance the AONB and require evidence of an exceptional need to justify major development in an AONB with the short-term financial benefit to a community who, repeatedly, in surveys express very strong preferences for sites of 25 new homes or fewer.

B-3.10 Comments on Section 11: Design Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
29 Landowner	Policy D4 Renewable Energy	Disagree	It is acknowledged that there is a need to address and mitigate against the effects of climate change, however such a specific requirement as the policy is currently worded is not justified. The policy should be amended so that it reflects the more flexible approach in policies DES7, DES8 and DES9 of the South Oxfordshire Local Plan.	NCR Woodcote Parish Council strongly support South Oxfordshire's recognition that the climate and ecological

			<p>Please see accompanying representation for further detail.</p>	<p>crises are the greatest challenges facing our society and their consequent:</p> <ul style="list-style-type: none"> • declaration in February 2019, of a climate emergency; and • goal of becoming a carbon neutral district by 2030 <p>Homes are responsible for some 18% of CO₂ emissions¹³. This policy:</p> <ul style="list-style-type: none"> vi. responds to the strongly expressed wish of residents of Woodcote to reduce the community's carbon footprint. vii. relates strongly to the District Council's priority theme 3 (Action on climate emergency); viii. supports the SOLP35 which notes that 'The design and construction of new developments and refurbishments to existing buildings can have a significant role in helping to reduce carbon emissions'; ix. supports policy DES9 Renewable and Low Carbon energy; and x. supports policy DES10 Carbon Reduction
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¹³ Carbon Footprint: Exploring the UK's contribution to climate change WWF March 2020

29 Landowner	Policy D6 Sustainable Transport	Disagree	<p>This policy requirement is not justified and should be amended to align with policy TRANS5 of the South Oxfordshire Local Plan.</p> <p>Please see accompanying representation for further detail.</p>	<p>NCR Woodcote Parish Council note the government announcement in November 2020 of ‘a commitment to end the sale of new petrol and diesel petrol and diesel vehicles by 2030, and that all new cars and vans will be required to be fully zero emission at the tailpipe by 2035’. This commitment is within the plan period which, together with the need to support South Oxfordshire District Councils actions to reduce CO₂ emissions render any lessening of this policy irresponsible.</p>
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B-3.11 Comments on Section 12: Development Site Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
29 Landowner	Policy HS1	Disagree	<p>The policy should be amended accordingly so that a minimum of 225 dwellings are accommodated for, including by allocating land at the Bridle Path.</p> <p>Please see accompanying representation for further detail.</p>	<p>NCR Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes allocated is the number that</p>

				<p>can be provided without causing unacceptable damage to the AONB.</p> <p>The Parish Council also note that this land at Bridle Path has been repeatedly refused planning permission by South Oxfordshire District Council because of the adverse impact on the AONB.</p>
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B-3.12 Comments on Section 13: Our Village – Our Future

No Comments

B-3.13 General Comments

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
20	General		The compilers of this draft plan are to be commended. Although I currently reside and work in the USA, I maintain strong links with Woodcote and my brother and I still own a property there. I hope, perhaps, one day to retire to Woodcote. I visit as often as I possibly can. I miss the place! I still regularly read *The Woodcote Correspondent* and the Wonderful Woodcote Facebook page.	NCR
35 Landowner	General		I believe that the site at 16 Bridle Path meets all the criteria set out in this document, sustainable housing, affordable housing, rural feel, consideration of the environment and helping WNP2 meet its housing allocation obligations. It will provide substantial capacity for rejuvenation in the village in the years to come.	NCR Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes

				<p>allocated is the number that can be provided without causing unacceptable damage to the AONB.</p> <p>The Parish Council also note that the land at Bridle Path has been repeatedly refused planning permission by South Oxfordshire District Council because of the adverse impact on the AONB.</p>
97 Landowner	General		<p>Further to the response lodged this week by Pro Vision, representing T A Fisher & Sons Ltd, I would urge that WNP2 includes the site at 16 Bridle Path. It ticks all the policy requirements produced in the Consultation Document, and the Agents and Developers are keen to work together with the NDPAG and Parish Council to provide the best solution for the village - in terms of affordable housing, improved infrastructure, maintaining the rural feel but also satisfying the housing requirements.</p>	<p>NCR</p> <p>Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes allocated is the number that can be provided without causing unacceptable damage to the AONB.</p> <p>The Parish Council also note that the land at Bridle Path has been repeatedly refused planning permission by South Oxfordshire District Council because of the adverse impact on the AONB.</p>

Appendix B-4 Agents and Organisations not resident in the Parish

This appendix contains the detailed submissions from agents representing landowners or developers. In the list:

- i. respondents are identified by a unique number¹⁴. Each comment can thus be mapped back to the original submission using the comment number.
- ii. comments are mapped to the appropriate section of WNP2 for easier analysis.

In reviewing the comments, the Parish Council use the following codes:

- **NCR** No Change Required because, for example, the comment is supportive of a policy, statement or other part of the Plan;
- **NCR/OPS** No Change Required because the comment is on matters that fall outside the scope of a Neighbourhood Plan;
- **NCR/PAC** No Change Required because the comments apply to matters dealt with when a planning application is being considered by the Local Planning Authority;
- **CR** Change Required

Where helpful or necessary the decision is explained with added commentary. Note that the consultees' comments often refer to paragraphs in the 2019 issue of the NPPF, the plan responses refer to the equivalent paragraphs in the 2021 issue of the NPPF.

B-4.1 Comments received on the Consultation Form

B-4.1.1 Comments on Section 2: Process Summary

No Comments

B-4.1.2 Comments on Section 3: Goals and Objectives

No Comments

B-4.1.3 Comments on Section 4: Woodcote – Our Village

No Comments

B-4.1.4 Comments on Section 5: Neighbourhood Plan Policies

No Comments

¹⁴ A full list of respondents is available.

B-4.1.5 Comments on Section 6: Community Well-Being Policies

No Comments

B-4.1.6 Comments on Section 7: Traffic and Transport Policies

No Comments

B-4.1.7 Comments on Section 8: Employment and Skills Policies

No Comments

B-4.1.8 Comments on Section 9: Countryside and Environment Policies

No Comments

B-4.1.9 Comments on Section 10: Housing Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
98 Agent	H1	Disagree	<p>The level of development proposed is inadequate and does not address the need identified by the Adopted SODC Local Plan. The policy wording should be amended to increase the level of development to 225 dwellings. In line with Nationals Guidance, the WNP2 should allocate the minimum housing requirements as set out in Policy H4 of the SODC Local Plan.</p> <p>Please see accompanying representation for further detail.</p>	<p>NCR Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes allocated is the number that can be provided without causing unacceptable damage to the AONB.</p>
99 Agent	H1	Disagree	<p>The level of development proposed is inadequate and does not address the need identified by the Adopted SODC Local Plan. The policy wording should be amended to increase the level of</p>	<p>NCR Woodcote Parish Council have scrutinised every offered site to</p>

			<p>development to 225 dwellings. In line with Nationals Guidance, the WNP2 should allocate the minimum housing requirements as set out in Policy H4 of the SODC Local Plan.</p> <p>Please see accompanying representation for further detail.</p>	<p>ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes allocated is the number that can be provided without causing unacceptable damage to the AONB.</p>
98 Agent	Policy H8	Disagree	<p>This policy proposes an artificial limit on housing numbers on any one site. This will greatly affect and limit the level of affordable housing that can be provided within the village. Limiting the scale of development on each site also results in more sites required for allocation and less infrastructure provided to meet the needs of the development and the community.</p> <p>Please see accompanying representation for more detail.</p>	<p>NCR The limit is not artificial. It is derived from detailed consideration of the national planning policies governing development in AONBs. The updated neighbourhood plan must 'conserve and enhance' the AONB and no exceptional circumstances have been put forward to justify, as is required by the NPPF, major development in the AONB. In addition, WNP2 can only be made with the support of the community, who repeatedly strongly object to developments of more than 25 new homes on a single site.</p>
99 Agent	Policy H8	Disagree	<p>This policy proposes an artificial limit on housing numbers on any one site. This will greatly affect and limit the level of affordable housing that can be provided within the village. Limiting the scale of development on each site also results in more sites required for allocation and less infrastructure provided to meet the needs of the development and the community.</p> <p>Please see accompanying representation for more detail.</p>	<p>NCR As above (comment 98 on policy H8) the limit is not artificial. It is derived from detailed consideration of the national planning policies</p>

				governing development in AONBs. WNP2 must 'conserve and enhance' the AONB and no exceptional circumstances have been put forward to justify, as is required by the NPPF, major development in the AONB. In addition, WNP2 can only be made with the support of the community, who repeatedly strongly object to developments of more than 25 new homes on a single site.
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B-4.1.10 Comments on Section 11: Design Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
98 Agent	Policy D4	Disagree	It is acknowledged that there is a need to address and mitigate against the effects of climate change, however such a specific requirement as the policy is currently worded is not justified. The policy should be amended so that it reflects the more flexible approach in policies DES7, DES8 and DES9 of the South Oxfordshire Local Plan. Please see accompanying representation for further detail.	NCR See the response to 29 (Landowner) to policy D4, above
99 Agent	Policy D4	Disagree	It is acknowledged that there is a need to address and mitigate against the effects of climate change, however such a specific requirement as the policy is currently worded is not justified. The policy should be amended so that it reflects the more flexible approach in policies DES7, DES8 and DES9 of the South Oxfordshire Local Plan. Please see accompanying representation for further detail.	NCR See the response to 29 (Landowner) to policy D4, above
98 Agent	Policy D6	Disagree	This policy requirement is not justified and should be amended to align with policy TRANS5 of the South Oxfordshire Local Plan. Please see accompanying representation for more detail.	NCR See response to 29 (Landowner) comment above
99 Agent	Policy D6	Disagree	This policy requirement is not justified and should be amended to align with policy TRANS5 of the South Oxfordshire Local Plan. Please see accompanying representation for more detail.	NCR See response to 29 (Landowner) comment above

B-4.1.11 Comments on Section 12: Development Site Policies

Responder	Section/ Policy	Agree/ Disagree	Comment	Plan Response
98 Agent	Policy HS1	Disagree	<p>The policy should be amended accordingly so that a minimum of 225 dwellings are accommodated for, including by allocating land at 16 Bridle Path.</p> <p>Please see accompanying representation for further detail.</p>	<p>NCR</p> <p>Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The number of new homes allocated is the number that can be provided without causing unacceptable damage to the AONB.</p> <p>The Parish Council also note that the land at Bridle Path has been repeatedly refused planning permission by South Oxfordshire District Council because of the adverse impact on the AONB.</p>
98 Agent	Policy HS1	Disagree	<p>The policy should be amended accordingly so that a minimum of 225 dwellings are accommodated for, including by allocating the land at Wood Lane.</p> <p>Please see accompanying representation for further detail.</p>	<p>NCR</p> <p>Woodcote Parish Council have scrutinised every offered site to ensure that development complies with both national (NPPF) and Local Plan policies, especially in connection with the requirement to conserve and enhance the AONB. The</p>

				<p>number of new homes allocated is the number that can be provided without causing unacceptable damage to the AONB.</p> <p>The site in Wood Lane was scrutinised and the results discussed with the owner/developers of the land. The site was assessed as unsuitable because development of this greenfield dry valley edge, typical of the Chilterns AONB, would not, as required by the NPPF, 'conserve and enhance' the AONB. The development would extend the built-up limits of the settlement and would detract from the character and appearance of the site and this part of the Chilterns Area of Outstanding Natural Beauty.</p> <p>Woodcote Parish Council also note the refusal of planning permission for this site in 2017 because of the damage to the AONB.</p>
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B-4.1.12 **Comments on Section 13: Our Village – Our Future**

No Comments

B-4.13 **General Comments**

No Comments

B-4.2 Pro Vision Submissions

B-4.2.1 Land at Wood Lane, Woodcote – Submission Prepared by Pro Vision on behalf of Woodcote Properties Ltd

LAND AT WOOD LANE, WOODCOTE

WOODCOTE NEIGHBOURHOOD PLAN CONSULTATION (APRIL 2021)

PROJECT NO. 2117

PREPARED BY:

LAURA BLACK MRTPI
PLANNER

CHECKED BY:

KATHERINE MILES MRTPI
DIRECTOR

DATE:

MAY 2021

PRO VISION

THE LODGE
HIGHCROFT ROAD
WINCHESTER
HAMPSHIRE
SO22 5GU



CONTENTS

- 1.0 Introduction
- 2.0 Housing Strategy and Housing Need Assessment
- 3.0 WNDP2 Evidence Base and Proposed Site Allocations
- 4.0 Other WNDP2 Proposed Policies
- 5.0 Conclusion

1.0 Introduction

- 1.1 This representation is made on behalf of our clients, Woodcote Properties Ltd, regarding the draft WNP2 Consultation Version April 2021 (WNDP2).
- 1.2 Specifically, this representation relates to the land at Wood Lane (Site ref. 6), Woodcote.
- 1.3 The site has been promoted for allocation for residential development in the WNDP2 throughout the Plan review and preparation process, including the submission of a site promotion document (November 2016) prepared by Broadway Malyan and Savills.
- 1.4 The site has not been included in the draft WNDP2, however this is considered to be a missed opportunity and given the shortfall of proposed sites for allocation against the housing requirement, the site should be looked upon favourably for allocation to assist in meeting the housing requirement of Woodcote as defined by Policy H4 of the South Oxfordshire Local Plan.
- 1.5 This representation assesses the WNDP2 housing strategy and its approach to the proposed site allocations, as well as commenting on the proposed draft policies of the WNDP2.

2.0 Housing Strategy and Housing Need Assessment

- 2.1 The South Oxfordshire District Council Local Plan (SODC LP) was adopted on 10 December 2020, covering the period 2011 - 2035. Policy H4, relates to 'Housing in the Larger Villages'. Woodcote remains a 'Larger Village' and therefore this policy has key significance to the preparation of the WNDP2.
- 2.2 Policy H4 has established a requirement for WNDP2 of 115 dwellings. This is in addition to the existing committed development of 110 homes through the current adopted Woodcote Neighbourhood Development Plan 2014 (WNDP1) giving a total requirement for the plan period of 225 new homes. However, the WNDP2 only proposes to allocate land for 57 new dwellings, as set out in table 10.i of the WNDP2. The WNDP2 therefore clearly falls significantly short in allocating a sufficient number of new dwellings, as required by Policy H4 of the SODC LP.
- 2.3 Under the Town and Country Planning Act 1990 (as amended)¹⁵, a draft Neighbourhood Plan must meet each of the seven basic conditions before it can be put to referendum and made. One of the basic conditions is to be "*in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)*". WNDP2 fails to meet this basic condition as it does not allocate sufficient land for housing in line with Policy H4 of the SODC LP.
- 2.4 The Neighbourhood Development Plan Advisory Group (NDPAG) carried out a Housing Need Assessment, which was published in March 2020. Within this, it states "*in the absence of an evidence based local housing allocation or reasons for ignoring the requirements for development in the AONB from the Local Planning Authority, and recognising that there will be an additional local need, Woodcote Parish Council have produced their own local objectively assessed housing need*".
- 2.5 However, the National Planning Policy Framework (NPPF) 2019 states that "*strategic policymaking authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbourhood areas) can be met over the plan*".

¹⁵ Paragraph 8(2), Schedule 4B

period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. **Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement**¹⁶. In addition, the NPPF states **“neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”**¹⁷.

- 2.6 This is further supported by the Planning Practice Guidance which states: **“Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan”**¹⁸.
- 2.7 The recently adopted SODC LP has therefore already established the housing need for the District, including an approved distribution strategy for meeting this need. The SODC LP relies upon the delivery of strategic housing allocations, and the allocation of smaller housing sites through Neighbourhood Planning. This includes the provision of additional housing in the larger villages such as Woodcote to maintain the Districts five year housing land supply. There has not been any significant change in circumstances that affects the requirement established for Woodcote (225 dwellings) in the five months since the adoption of the SODC LP. Therefore, there is no justification for such a deviation from the requirements of Policy H4. This also indicates a further failure of the WNDP2 to meet another of the basic conditions which is **“having regard to national policies and advice contained in guidance issued by the Secretary of State...”**.
- 2.8 The supporting text to Policy H4 makes clear that **“this level of growth will support local services and facilities in a sustainable and balanced distribution of development. Where Larger Villages are in the process of preparing a Neighbourhood Development Plan, the delivery of the houses allocated to these villages should be provided for by the Neighbourhood Development Plan. This enables communities to have their say on **where** development in their area will go”**¹⁹. This is clear that the question of **how much** development should be provided has been determined through the SODC LP Examination process, and therefore the WNDP2 should limit itself to allocating sufficient sites to meet the established need, and to setting local policies to guide such development.
- 2.9 The Inspector’s report on the Examination of the SODC LP¹⁹ discusses at length the Plan’s housing requirement, spatial strategy and its approach towards development in the towns, villages and countryside and whether having regard to the needs of the District and the constraints such as Green Belt and AONB, the plan was sound. The Inspector’s findings are summarised below:
- **“The 2018 household projections for the District show lower household growth than the projections referred to in the SHMA. This has led to suggestions that the housing need figure for South Oxfordshire should be revised downwards. However, household projections are not predictions; nor are they assessments of housing need. The 2014 SHMA remains the most recent full assessment of need. It is a very detailed study and was produced cooperatively by, and agreed between, the Oxfordshire authorities. All the other Oxfordshire authorities consider the SHMA still to be the most relevant assessment of housing need, and its assessment underpins their local plan housing requirements.”**²⁰;
 - **“There is no reason why meeting the housing requirement should adversely affect the District’s two AONBs...there is no evidence that growth at the scale envisaged would harm the AONBs. In any case, additional development anywhere within the plan area would still need to comply with Policy ENV1 which protects the AONBs, the landscape and the countryside”**²¹;

¹⁶ Paragraph 65

¹⁷ Paragraph 29

¹⁸ Paragraph: 104 Reference ID: 41-104-0190509 ⁵ Paragraph 4.19

¹⁹ Dated 27 November 2020

²⁰ Paragraph 37

²¹ Paragraph 49

- *“In evolving the spatial strategy, the Council has considered all the options...The strategy that was been finally selected has innate logic and integrity. It seeks to fulfil important public objectives in delivering development to meet identified needs in a sustainable manner”²²;*
 - *“The plan justifiably classifies the villages into larger, smaller and other villages and takes a proportionate approach towards growth in them”²³;*
 - *“For the larger villages, the Plan proposes 15% growth calculated in the same way as that for the market towns. This is a proportionate approach which takes into account the existing size of the villages”²⁴;*
 - *“It is not therefore necessary to modify Policy H4 to provide greater flexibility to deliver homes”²⁵; and*
 - *“Subject to the main modifications...the Plan’s strategic allocations, and its approach towards development in the towns, villages and the countryside, is sound”²⁶.*
- 2.10 It is therefore clear that the housing requirement for Woodcote has been established by the Council through the strategic plan and its evidence base. That plan has been tested independently at Examination and found to be sound. There is therefore no reasonable justification to depart from the housing requirement set by Policy H4 of the SODC LP. The WNDP2 should therefore be prepared in line with Paragraphs 29 and 65 of the Framework and Policy H4 of the SODC LP in order to satisfy the basic conditions set out within legislation.
- 2.11 It should also be noted that the High Court has for the second time rejected a bid by an environmental campaign group for judicial review of the SODC LP. This was due to concerns around the extent of housing proposed over the Plan period. The reason for the rejection was that the claim was unarguable and the campaign group were ordered to pay costs.
- 2.12 We have also reviewed the Housing Needs Assessment prepared by the Woodcote NDP Group. We note that this document formed part of the Parish Council’s objections to the Local Plan and therefore this was considered by the Independent Local Plan Inspector. Clearly, and notwithstanding the Parish Council’s representations, the Inspector concluded that the requirement for Woodcote of 115 (225 total) was sound.
- 2.13 Turning specifically to the Housing Needs Assessment itself, the WNDP2 housing requirement of 50-60 houses appears to be justified solely on the basis that *“Increasing the number of houses above 60 could result in the primary school not having enough capacity and raise the total population to a level which could attract a pharmacy, jeopardising the viability of the health centre”*. These conclusions are however not definitive i.e., “could” not ‘would’– this statement does not therefore conclude definitively what infrastructure is required to support an additional 115 dwellings, nor does it assess whether such infrastructure could be delivered and / or how such infrastructure could be funded.
- 2.14 The Infrastructure Delivery Plan prepared by SODC in April 2020 (and we note produced after the Parish Council’s Housing Needs Assessment) considers the District-Wide Infrastructure requirements arising from the housing requirement. It states at Section 7 that *“it is important to note that the South Oxfordshire Local Plan only includes targets for certain Neighbourhood Plan areas, and **the infrastructure associated with these plans should be reviewed as part of the development or review process to reflect the proposed sites, and in line with national guidance**”*.
- 2.15 The Parish Council has not produced as part of its evidence base any assessment of the infrastructure requirements to support the proposed development, nor conversely has it produced any evidence to state why the infrastructure required to support 115 homes could not be provided.
- 2.16 The Parish Council’s Housing Need Assessment is therefore not an assessment of need i.e. it does not actually conclude what level of homes are needed within the Parish. It is only an assessment of what level of development the Parish Council considers could be provided and served by the existing infrastructure provision. Therefore the

²² Paragraph 61

²³ Paragraph 78

²⁴ Paragraph 190

²⁵ Paragraph 191

²⁶ Paragraph 197

Parish Council's assessment is itself constraining the growth of the village rather than boosting the supply of new homes and promoting the vitality of the community as required by the National Planning Policy Framework.

- 2.17 In conclusion, the Housing Needs Assessment is itself flawed, and in any event was not necessary given the housing requirement for Woodcote has very recently been established and set through the strategic policies of the SODC LP.

3.0 WNDP2 Evidence Base and Proposed Site Allocations

- 3.1 It is noted that the supporting text to Policy H4 of the SODC LP explains that some villages are constrained by factors such as Areas of Outstanding Natural Beauty (AONB) and that a 15% growth may not be fully achievable. However, it goes on to explain that the detailed evidence base will need to be provided to support a NDP and its assessment of capacity, including whether this is to support a higher or lower number than that provided in Policy H4²⁷.
- 3.2 The WNDP2 evidence base, in addition to the Housing Need Assessment, comprises of a Major Development in the AONB note, Sustainability Assessment, Landscape and Visual Impact Assessment (LVIA), and a Biodiversity Report. Having reviewed these documents, we do not consider that these provide the "detailed evidence base" or sufficient justification for proposing a lower housing allocation in Woodcote, particularly given that the SODC LP and its evidence base has very recently been examined and considered sound.
- 3.3 The Major Development in the AONB note simply reiterates national planning policy and guidance in terms of what constitutes major development in an AONB. Case law has held that whether an individual proposal is major development is a matter for the decision maker and that there are various factors to be considered in determining this. Each site should be assessed individually in terms of its impacts on the AONB landscape. The note itself does not provide a detailed evidence base to support why Woodcote, as a larger village, cannot meet its housing requirement in line with the SODC LP.
- 3.4 It is apparent that the WNDP2 is relying on Woodcote's location within the AONB as the sole reason to propose less housing than has been established and is required by Policy H4 of the SODC LP. It is clearly possible to accommodate the housing requirement in Woodcote, whilst having regard to the AONB and the character of the village, as noted in the Inspector's report on the examination of the SODC LP at Paragraph 49 where it was held that there was "**no evidence that growth at the scale envisaged would harm the AONBs**". Individual proposals will need to demonstrate good design, and accord with other adopted policies including Policy ENV1 of the SODC LP which seeks to protect the landscape including AONBs.
- 3.5 The site promotion document previously submitted for land at Wood Lane demonstrates that the site is suitable for development and can be developed sensitively to assist the community in meeting its unmet housing needs. This is discussed further below.
- 3.6 The SODC LP evidence base includes a Sustainability Appraisal, which was submitted as part of the LP Examination. Within this, it explains:
- *"the Council's spatial strategy has been appraised...It will help to deliver housing to meet local need (SA objective 1), support the vitality and viability of the market towns and larger villages, with positive effects in relation to services and improving health...and overall it would take into account the Greenbelt and the AONB"*²⁸; and
 - *"the implementation of the proposed Local Plan policies contained in the Draft Local Plan is anticipated to have positive effects across all of the SA objectives. These effects are expected to be particularly significant in respect of housing (SA objective 1) ...It also reflects the strong framework provided by the plan policies that will help to conserve the district's natural and built environment and resources"*²⁹
- 3.7 The WNDP2 evidence base also includes a Sustainability Assessment. This explains that the impact of the proposed housing sites is determined by the magnitude of the effect on the Parish and the AONB and whether development improves or degrades sustainability. This has been assessed by carrying out a LVIA. However, the production

²⁷ Paragraph 4.28

²⁸ Page 29

²⁹ Page 259

of both of these reports is not considered to have been necessary, given SODC carried out both a Sustainability Appraisal and Landscape Capacity Assessment (LCA) as part of the production of the SODC LP, both of which were examined by the Inspector very recently.

- 3.8 The LCA which underpins the SODC LP states “34 sites should not be included as potential housing sites on landscape and visual grounds. Of the remaining 99 sites the landscape capacity varies considerably with a number of sites amended to show a ‘reduced area’ where development might be acceptable...”³⁰. None of those 34 excluded sites are within Woodcote. 14 sites are specifically identified for Woodcote, with the majority assessed as having a ‘medium’ landscape capacity.
- 3.9 Conversely, in the WNDP2 LVIA, of the 18 sites identified, 11 are deemed unsuitable for development, one of which is land at Wood Lane, with the reason being “major adverse landscape and visual effects which cannot satisfactorily be mitigated”. Land at Wood Lane was not available at the time of the LCA publication and is therefore not included for assessment, however it is immediately adjacent to site WNP1-19 which is allocated for 9 dwellings under WNDP1.
- 3.10 The LCA was prepared for SODC by a qualified and chartered landscape practice. The LCA underpins the Council’s decisions on site allocations and has been tested at the Examination. The WNDP2 LVIA on the other hand has been prepared by three Parish Councillors without any apparent landscape qualifications or professional landscape experience and does not appear to be independent or impartial. The LVIA was also prepared after decisions had been made by the Parish Council on both the housing requirement and the proposed allocations – in other words, it appears that the LVIA has been retrofitted to support the conclusions drawn by the Parish Council, rather than as a truly independent document used to guide and inform decision making. This is particularly evidenced by the fact that consultation on the proposed sites was held in 2019, whereas the LVIA was prepared in March 2021. Further, we note that “reviewed by” has been left blank. It therefore appears that this draft document has yet to be reviewed by an independent person or landscape professional. We therefore question the validity of this report and its role within the evidence base of the WNDP2.
- 3.11 In terms of the residential sites proposed for allocation in the WNDP2, there are some sites which would have a greater impact on the landscape than land at Wood Lane. The Major Development in the AONB note states: “the location of the development relative to the built up area is critical in assessing whether an application is major. If the site is enclosed within the built area it is unlikely to have a significant impact on the AONB”³¹. Therefore, it is not clear why the WNDP2 has proposed WNP2-09 (Beechwood Court) for allocation, given this is much more disconnected from the ‘built area’ than land at Wood Lane.
- 3.12 Proposed sites WNP2-02 and 03 (Land behind Yew Tree Farmhouse) have no road frontage and would need to be accessed via a narrow track off Behoes Lane and there is limited, if any, scope for widening. The LCA refers to these sites as ‘WOO6’ and it is noted that “the loss of key mosaic characteristics” is identified to result in potential impact on the AONB.
- 3.13 Land at Wood Lane is well related to the existing (and proposed, when taking into account land at Wood Lane’s relationship with WNP1-19) pattern of development. In terms of sustainability, land at Wood Lane is within close proximity (less than 200m) of services and facilities, including a bus stop and a Co-op food shop located on Bridle Path, whereas WNP2-02 and 03 are approximately 400m from these services and facilities and WNP2-09 over 700m from Co-op.
- 3.14 Land at Wood Lane is inherently more suitable for development than WNP2-02, 03 and 09 and will provide a more valuable contribution towards meeting Woodcote’s housing requirement, including their ability to offer greater affordable housing. This site is required if Woodcote is to meet its housing requirement of 115 additional dwellings as set by SODC LP Policy H4.
- 3.15 In summary, the evidence base is lacking and does not reflect the conclusions of the evidence base available and already tested as part of the SODC LP Examination.

4.0 Other WNDP2 Proposed Policies

- 4.1 The WNDP2 proposes numerous new policies that appear to be either not justified or they do not accord with the SODC LP.

³⁰ Paragraph 10.1, page 828

³¹ Page 4

- 4.2 WNDP2 Policy H1 – Number of New Homes states that *“planning permission will be granted for 133 new homes to be built in Woodcote in the period to 31st March 2035 on the sites specifically allocated in the Woodcote Neighbourhood Plan”*. This policy is unnecessarily restrictive and indicates that any housing over and above the 133 figure or on sites not specifically allocated will not be entertained. The policy wording should be revised so that not only does it allow some flexibility in the number of homes that could be permitted over the Plan period, i.e. to reflect sites coming forward as windfall sites, but that at the very least the policy allows for the housing requirement of 115 additional dwellings as set by SODC LP Policy H4, in addition to the 76 houses allocated in the WNDP1 and other commitments, totalling a minimum of 225 houses. In summary, Policy H1 should be amended as follows:
Planning permission will be granted for a minimum of 225 new homes to be built in Woodcote in the period to 31st March 2035.
- 4.3 Throughout the WNDP2 it expresses there is a strong need and overwhelming desire by local residents for affordable housing. Policy H3 – Affordable Housing requires that *“proposals for development that result in a net gain of five or more dwellings or where the site has an area of 0.5 hectares or more will be expected to provide a minimum of 40% affordable housing on the site which will be fully integrated into the development unless a Financial Viability Assessment demonstrates a robust justification for a different percentage.”* This aligns with Policy H9 of the SODC LP.
- 4.4 However, given this evident strong need for affordable housing both at the local and district wide level, we see no justification for WNDP2 Policy H8 – Scale of New Development, which states *“proposals will be supported for a maximum of 30 new homes on any allocated site”*. By limiting housing numbers at any one site, the WNDP2 will itself greatly affect and limit the level of affordable housing that can be provided.
- 4.5 We note also that several sites selected for allocation will be too small to deliver any affordable housing. Other sites may be subject to viability constraints (this may particularly be the case for sites where there is an existing building or use and where the cost of the land / existing use value is high) and therefore fail to deliver affordable housing.
- 4.6 We note also that within the Housing Needs Assessment itself, there is no specific assessment of the affordable housing need within the village. Ultimately we consider that additional housing sites are needed in order to make a meaningful contribution to providing affordable homes within the village.
- 4.7 WNDP2 Policy D4 relates to renewable energy and states *“all new development should contain solar photovoltaic panels and/or solar water heating panels and new dwellings and buildings be aligned to maximise energy generation”*. It is acknowledged that there is a need to address and mitigate against the effects of climate change, however such a specific requirement is not justified.
- 4.8 The SODC LP Policy DES7 – Efficient Use of Resources allows for flexibility by stating that *“new development is required to make provision for the effective use and protection of natural resources where applicable”* and suggests various measures that can be incorporated into development proposals.
- 4.9 Similarly, SODC LP Policy DES8 – Promoting Sustainable Design states *“all new development...should seek to minimise the carbon and energy impacts of their design and construction”* and *“all new development should be designed to improve resilience to the anticipated effects of climate change”*.
- 4.10 In addition, SODC LP Policy DES9 – Renewable and Low Carbon Energy states *“the council encourages schemes for renewable and low carbon energy generation and associated infrastructure at all scales including domestic schemes. It also encourages the incorporation of renewable and low carbon energy applications within all development”*. A similarly flexible approach should be taken and therefore the wording of WNDP2 Policy D4 should be amended accordingly.
- 4.11 WNDP2 Policy D6 – Sustainable Transport requires all new development to provide *“a. one electric vehicle charging point for houses with up to two bedrooms; b. two electric vehicle charging points for houses within three bedrooms or more; and c. secure bicycle storage facilities”*. However, the comparative Policy TRANS5 – Consideration of Development Proposals in the SODC LP states that *“proposals for all types of development will, where appropriate...be designed to enable charging of plug-in and other low-emission vehicles in safe, accessible and convenient locations”*. It is considered that WNDP2 Policy D6 is again not justified and should be amended to better align with the flexibility of SODC LP Policy TRANS5.
- 4.12 WNDP2 Policy HS1 – Site Allocations sets out the proposed residential allocations. This includes the five new sites proposed, totalling 57 dwellings. This falls short in allocating a sufficient number of new dwellings, as required by Policy H4 of the SODC LP. The Policy should be amended accordingly so that a minimum of 115 dwellings are accommodated for, including land at Wood lane, for the reasons as discussed above.

5.0 Conclusion

- 5.1 In summary, the WNDP2 falls short in allocating a sufficient number of dwellings over the Plan period, as required by Policy H4 of the SODC LP. The WNDP2 therefore fails to meet the basic condition tests, including being in general conformity with the strategic policies in the Development Plan for the area and having regard to national policies and advice.
- 5.2 The WNDP2 and its evidence base appears to be relying on Woodcote's location within the AONB as the reason to propose less housing than is required. However, the Council's evidence base demonstrates that there are suitable sites available, including the Land at Wood Lane, which can be developed without adverse impact on the AONB. The Council's evidence base therefore confirms that it is possible to accommodate the housing requirement in Woodcote, whilst having regard to the AONB and the character of the village. This was noted by the Inspector for the SODC LP examination and is confirmed by the LCA.
- 5.3 The site promotion document previously submitted for land at Wood Lane demonstrates that the site is well related to the existing pattern of development and is physically and visually contained by a substantial landscape framework, including opportunities for further landscape enhancement. Carefully designed new development at the site would represent a logical rounding off opportunity of the built-up area without adversely impacting on the AONB landscape.
- 5.4 Woodcote Properties Ltd are keen to work collaboratively with the Parish Council, the NDPAG and the local community to bring forward the development site. Such development would provide a valuable contribution towards meeting Woodcote's housing requirement whilst achieving a sustainable and sensitive form of residential development which has regard to the AONB landscape and supports the vitality and viability of Woodcote.
- 5.5 The draft WNDP2 does not meet the basic conditions and therefore should not proceed to Independent Examination.

LAND AT BRIDLE PATH, WOODCOTE

WOODCOTE NEIGHBOURHOOD PLAN CONSULTATION (APRIL 2021)

PROJECT NO. 2117

PREPARED BY:

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PLANNER

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DIRECTOR

DATE:

MAY 2021

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- 5.0 Conclusion

1.0 Introduction

- 1.1 This representation is made on behalf of our clients, T A Fisher, regarding the draft WNP2 Consultation Version April 2021 (WNDP2).
- 1.2 Specifically, this representation relates to the land at Bridle Path (Site ref. 4), Woodcote.
- 1.3 The site has been promoted for allocation for residential development in the WNDP2 throughout the Plan review and preparation process, including the submission of a detailed site promotion document (November 2018) prepared by Pro Vision.
- 1.4 The site has not been included in the draft WNDP2, however this is considered to be a missed opportunity and given the shortfall of proposed sites for allocation against the housing requirement, the site should be looked upon favourably for allocation to assist in meeting the housing requirement of Woodcote as defined by Policy H4 of the South Oxfordshire Local Plan.
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³³ Paragraph 65

³⁴ Paragraph 29

³⁵ Paragraph: 104 Reference ID: 41-104-20190509 ⁵ Paragraph 4.19

³⁶ Dated 27 November 2020

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 - *“It is not therefore necessary to modify Policy H4 to provide greater flexibility to deliver homes”⁴²; and*
 - *“Subject to the main modifications...the Plan’s strategic allocations, and its approach towards development in the towns, villages and the countryside, is sound”⁴³.*
- 2.10 It is therefore clear that the housing requirement for Woodcote has been established by the Council through the strategic plan and its evidence base. That plan has been tested independently at Examination and found to be sound. There is therefore no reasonable justification to depart from the housing requirement set by Policy H4 of the SODC LP. The WNDP2 should therefore be prepared in line with Paragraphs 29 and 65 of the Framework and Policy H4 of the SODC LP in order to satisfy the basic conditions set out within legislation.
- 2.11 It should also be noted that the High Court has for the second time rejected a bid by an environmental campaign group for judicial review of the SODC LP. This was due to concerns around the extent of housing proposed over the Plan period. The reason for the rejection was that the claim was unarguable and the campaign group were ordered to pay costs.
- 2.12 We have also reviewed the Housing Needs Assessment prepared by the Woodcote NDP Group. We note that this document formed part of the Parish Council’s objections to the Local Plan and therefore this was considered by the Independent Local Plan Inspector. Clearly, and notwithstanding the Parish Council’s representations, the Inspector concluded that the requirement for Woodcote of 115 (225 total) was sound.
- 2.13 Turning specifically to the Housing Needs Assessment itself, the WNDP2 housing requirement of 50-60 houses appears to be justified solely on the basis that *“Increasing the number of houses above 60 could result in the primary school not having enough capacity and raise the total population to a level which could attract a pharmacy, jeopardising the viability of the health centre”*. These conclusions are however not definitive i.e., “could” not ‘would’– this statement does not therefore conclude definitively what infrastructure is required to support an additional 115 dwellings, nor does it assess whether such infrastructure could be delivered and / or how such infrastructure could be funded.
- 2.14 The Infrastructure Delivery Plan prepared by SODC in April 2020 (and we note produced after the Parish Council’s Housing Needs Assessment) considers the District-Wide Infrastructure requirements arising from the housing requirement. It states at Section 7 that *“it is important to note that the South Oxfordshire Local Plan only includes targets for certain Neighbourhood Plan areas, and **the infrastructure associated with these plans should be reviewed as part of the development or review process to reflect the proposed sites, and in line with national guidance**”*.
- 2.15 The Parish Council has not produced as part of its evidence base any assessment of the infrastructure requirements to support the proposed development, nor conversely has it produced any evidence to state why the infrastructure required to support 115 homes could not be provided.

³⁹ Paragraph 61

⁴⁰ Paragraph 78

⁴¹ Paragraph 190

⁴² Paragraph 191

⁴³ Paragraph 197

- 2.16 The Parish Council's Housing Need Assessment is therefore not an assessment of need i.e. it does not actually conclude what level of homes are needed within the Parish. It is only an assessment of what level of development the Parish Council considers could be provided and served by the existing infrastructure provision. Therefore the Parish Council's assessment is itself constraining the growth of the village rather than boosting the supply of new homes and promoting the vitality of the community as required by the National Planning Policy Framework.
- 2.17 In conclusion, the Housing Needs Assessment is itself flawed, and in any event was not necessary given the housing requirement for Woodcote has very recently been established and set through the strategic policies of the SODC LP.

3.0 WNDP2 Evidence Base and Proposed Site Allocations

- 3.1 It is noted that the supporting text to Policy H4 of the SODC LP explains that some villages are constrained by factors such as Areas of Outstanding Natural Beauty (AONB) and that a 15% growth may not be fully achievable. However, it goes on to explain that the detailed evidence base will need to be provided to support a NDP and its assessment of capacity, including whether this is to support a higher or lower number than that provided in Policy H4⁴⁴.
- 3.2 The WNDP2 evidence base, in addition to the Housing Need Assessment, comprises of a Major Development in the AONB note, Sustainability Assessment, Landscape and Visual Impact Assessment (LVIA), and a Biodiversity Report. Having reviewed these documents, we do not consider that these provide the "detailed evidence base" or sufficient justification for proposing a lower housing allocation in Woodcote, particularly given that the SODC LP and its evidence base has very recently been examined and considered sound.
- 3.3 The Major Development in the AONB note simply reiterates national planning policy and guidance in terms of what constitutes major development in an AONB. Case law has held that whether an individual proposal is major development is a matter for the decision maker and that there are various factors to be considered in determining this. Each site should be assessed individually in terms of its impacts on the AONB landscape. The note itself does not provide a detailed evidence base to support why Woodcote, as a larger village, cannot meet its housing requirement in line with the SODC LP.
- 3.4 It is apparent that the WNDP2 is relying on Woodcote's location within the AONB as the sole reason to propose less housing than has been established and is required by Policy H4 of the SODC LP. It is clearly possible to accommodate the housing requirement in Woodcote, whilst having regard to the AONB and the character of the village, as noted in the Inspector's report on the examination of the SODC LP at Paragraph 49 where it was held that there was "**no evidence that growth at the scale envisaged would harm the AONBs**". Individual proposals will need to demonstrate good design, and accord with other adopted policies including Policy ENV1 of the SODC LP which seeks to protect the landscape including AONBs.
- 3.5 The site promotion document previously submitted for land at Bridle Path demonstrates that the site is suitable for development and can be developed sensitively to assist the community in meeting its unmet housing needs. This is discussed further below.
- 3.6 The SODC LP evidence base includes a Sustainability Appraisal, which was submitted as part of the LP Examination. Within this, it explains:
- *"the Council's spatial strategy has been appraised...It will help to deliver housing to meet local need (SA objective 1), support the vitality and viability of the market towns and larger villages, with positive effects in relation to services and improving health...and overall it would take into account the Greenbelt and the AONB"*⁴⁵; and

⁴⁴ Paragraph 4.28

⁴⁵ Page 29

- *“the implementation of the proposed Local Plan policies contained in the Draft Local Plan is anticipated to have positive effects across all of the SA objectives. These effects are expected to be particularly significant in respect of housing (SA objective 1) ...It also reflects the strong framework provided by the plan policies that will help to conserve the district’s natural and built environment and resources”*⁴⁶
- 3.7 The WNDP2 evidence base also includes a Sustainability Assessment. This explains that the impact of the proposed housing sites is determined by the magnitude of the effect on the Parish and the AONB and whether development improves or degrades sustainability. This has been assessed by carrying out a LVIA. However, the production of both of these reports is not considered to have been necessary, given SODC carried out both a Sustainability Appraisal and Landscape Capacity Assessment (LCA) as part of the production of the SODC LP, both of which were examined by the Inspector very recently.
- 3.8 The LCA which underpins the SODC LP states *“34 sites should not be included as potential housing sites on landscape and visual grounds. Of the remaining 99 sites the landscape capacity varies considerably with a number of sites amended to show a ‘reduced area’ where development might be acceptable...”*⁴⁷. None of those 34 excluded sites are within Woodcote. 14 sites are specifically identified for Woodcote (including land at Bridle Path, referred to as WOO12), with the majority assessed as having a ‘medium’ landscape capacity.
- 3.9 Conversely, in the WNDP2 LVIA, of the 18 sites identified, 11 are deemed unsuitable for development, one of which is land at Bridle Path, with the reason being “major adverse landscape and visual effects which cannot satisfactorily be mitigated”. However, in the LCA, for land at Bridle Path, it states that development at the site is **unlikely to affect the AONB** and acknowledges that locally valued views across the paddocks from the PRoW to the east can be retained. It concludes that **38 dwellings might be accommodated at the site without harm to the AONB**, with a reduced developable area to the northern half.
- 3.10 In addition, an LVIA was prepared by Terra Firma in November 2017 to support an outline planning application for the erection of up to 45 homes, access, parking, landscaping, open space, play area and associated infrastructure, including removal of existing paddock structures (ref. P18/S0004/O). This concluded that: *“the proposals will remove some detracting features, qualities, experiences and visual components that are associated with the existing paddock land-use, with declining outbuildings, other ancillary structures and equestrian paraphernalia. These would be replaced with new features, qualities, experiences and visual components as a consequence of a well-considered design process which would ensure that the proposed housing development would be an aesthetically pleasant, functional and integrates environment. This would also provide an opportunity to create a stronger settlement edge, inclusive of extensive areas of public open space with naturalistic landscape treatment, and would be more effective as a transition in the countryside than the existing relationship between the settlement edge and the paddocks. This specifically responds to one of the planning and development issues outlines by the South Oxfordshire Landscape Assessment. The existing positive baseline landscape and visual components would be retained wherever possible, such as the landscape structure defined by the established hedgerows and tree cover, particularly those around the site edges”*.
- 3.11 The LCA was prepared for SODC by a qualified and chartered landscape practice. The LCA underpins the Council’s decisions on site allocations and has been tested at the Examination. The WNDP2 LVIA on the other hand has been prepared by three Parish Councillors without any apparent landscape qualifications or professional landscape experience and does not appear to be independent or impartial. The LVIA was also prepared after decisions had been made by the Parish Council on both the housing requirement and the proposed allocations – in other words, it appears that the LVIA has been retrofitted to support the conclusions drawn by the Parish Council, rather than as a truly independent document used to guide and inform decision making. This is particularly evidenced by the fact that consultation on the proposed sites was held in 2019, whereas the LVIA was prepared in March 2021. Further, we note that “reviewed by” has been left blank. It therefore appears that this draft document has yet to be reviewed by an independent person or landscape professional. We therefore question the validity of this report and its role within the evidence base of the WNDP2.

⁴⁶ Page 259

⁴⁷ Paragraph 10.1, page 828

- 3.12 In terms of the residential sites proposed for allocation in the WNDP2, there are some sites which would have a greater impact on the landscape than land at Bridle Path. The Major Development in the AONB note states: *“the location of the development relative to the built up area is critical in assessing whether an application is major. If the site is enclosed within the built area it is unlikely to have a significant impact on the AONB”*⁴⁸. Therefore, it is not clear why the WNDP2 has proposed WNP2-09 (Beechwood Court) for allocation, given this is much more disconnected from the ‘built area’ than land at Bridle Path.
- 3.13 Proposed sites WNP2-02 and 03 (Land behind Yew Tree Farmhouse) have no road frontage and would need to be accessed via a narrow track off Behoes Lane and there is limited, if any, scope for widening. The LCA refers to these sites as ‘WOO6’ and it is noted that *“the loss of key mosaic characteristics”* is identified to result in potential impact on the AONB.
- 3.14 Land at Bridle Path is well related to the existing pattern of development. In terms of sustainability, land at Bridle Path is within close proximity (less than 200m) of services and facilities, including a bus stop and a Co-op food shop located on Bridle Path, whereas WNP202 and 03 are approximately 400m from these services and facilities and WNP2-09 over 700m from Co-op.
- 3.15 Land at Bridle Path is inherently more suitable for development than WNP2-02, 03 and 09 and will provide a more valuable contribution towards meeting Woodcote’s housing requirement, including their ability to offer greater affordable housing. In the case of land at Bridle Path, this site is also well placed to meet other local needs including the provision of older persons housing and new open space. This site is required if Woodcote is to meet its housing requirement of 115 additional dwellings as set by SODC LP Policy H4.
- 3.16 In summary, the evidence base is lacking and does not reflect the conclusions of the evidence base available and already tested as part of the SODC LP Examination.

4.0 Other WNDP2 Proposed Policies

- 4.1 The WNDP2 proposes numerous new policies that appear to be either not justified or they do not accord with the SODC LP.
- 4.2 WNDP2 Policy H1 – Number of New Homes states that *“planning permission will be granted for 133 new homes to be built in Woodcote in the period to 31st March 2035 on the sites specifically allocated in the Woodcote Neighbourhood Plan”*. This policy is unnecessarily restrictive and indicates that any housing over and above the 133 figure or on sites not specifically allocated will not be entertained. The policy wording should be revised so that not only does it allow some flexibility in the number of homes that could be permitted over the Plan period, i.e. to reflect sites coming forward as windfall sites, but that at the very least the policy allows for the housing requirement of 115 additional dwellings as set by SODC LP Policy H4, in addition to the 76 houses allocated in the WNDP1 and other commitments, totalling a minimum of 225 houses. In summary, Policy H1 should be amended as follows:
Planning permission will be granted for a minimum of 225 new homes to be built in Woodcote in the period to 31st March 2035.
- 4.3 Throughout the WNDP2 it expresses there is a strong need and overwhelming desire by local residents for affordable housing. Policy H3 – Affordable Housing requires that *“proposals for development that result in a net gain of five or more dwellings or where the site has an area of 0.5 hectares or more will be expected to provide a minimum of 40% affordable housing on the site which will be fully integrated into the development unless a Financial Viability Assessment demonstrates a robust justification for a different percentage.”* This aligns with Policy H9 of the SODC LP.
- 4.4 However, given this evident strong need for affordable housing both at the local and district wide level, we see no justification for WNDP2 Policy H8 – Scale of New Development, which states *“proposals will be supported for a maximum of 30 new homes on any allocated site”*. By limiting housing numbers at any one site, the WNDP2 will itself greatly affect and limit the level of affordable housing that can be provided.

⁴⁸ Page 4

- 4.5 We note also that several sites selected for allocation will be too small to deliver any affordable housing. Other sites may be subject to viability constraints (this may particularly be the case for sites where there is an existing building or use and where the cost of the land / existing use value is high) and therefore fail to deliver affordable housing.
- 4.6 We note also that within the Housing Needs Assessment itself, there is no specific assessment of the affordable housing need within the village. Ultimately we consider that additional housing sites are needed in order to make a meaningful contribution to providing affordable homes within the village.
- 4.7 WNDP2 Policy D4 relates to renewable energy and states *“all new development should contain solar photovoltaic panels and/or solar water heating panels and new dwellings and buildings be aligned to maximise energy generation”*. It is acknowledged that there is a need to address and mitigate against the effects of climate change, however such a specific requirement is not justified.
- 4.8 The SODC LP Policy DES7 – Efficient Use of Resources allows for flexibility by stating that *“new development is required to make provision for the effective use and protection of natural resources where applicable”* and suggests various measures that can be incorporated into development proposals.
- 4.9 Similarly, SODC LP Policy DES8 – Promoting Sustainable Design states *“all new development...should seek to minimise the carbon and energy impacts of their design and construction”* and *“all new development should be designed to improve resilience to the anticipated effects of climate change”*.
- 4.10 In addition, SODC LP Policy DES9 – Renewable and Low Carbon Energy states *“the council encourages schemes for renewable and low carbon energy generation and associated infrastructure at all scales including domestic schemes. It also encourages the incorporation of renewable and low carbon energy applications within all development”*. A similarly flexible approach should be taken and therefore the wording of WNDP2 Policy D4 should be amended accordingly.
- 4.11 WNDP2 Policy D6 – Sustainable Transport requires all new development to provide *“a. one electric vehicle charging point for houses with up to two bedrooms; b. two electric vehicle charging points for houses within three bedrooms or more; and c. secure bicycle storage facilities”*. However, the comparative Policy TRANS5 – Consideration of Development Proposals in the SODC LP states that *“proposals for all types of development will, where appropriate...be designed to enable charging of plug-in and other low-emission vehicles in safe, accessible and convenient locations”*. It is considered that WNDP2 Policy D6 is again not justified and should be amended to better align with the flexibility of SODC LP Policy TRANS5.
- 4.12 WNDP2 Policy HS1 – Site Allocations sets out the proposed residential allocations. This includes the five new sites proposed, totalling 57 dwellings. This falls short in allocating a sufficient number of new dwellings, as required by Policy H4 of the SODC LP. The Policy should be amended accordingly so that a minimum of 115 dwellings are accommodated for, including land at Bridle Path, for the reasons as discussed above.

5.0 Conclusion

- 5.1 In summary, the WNDP2 falls short in allocating a sufficient number of dwellings over the Plan period, as required by Policy H4 of the SODC LP. The WNDP2 therefore fails to meet the basic condition tests, including being in general conformity with the strategic policies in the Development Plan for the area and having regard to national policies and advice.
- 5.2 The WNDP2 and its evidence base appears to be relying on Woodcote’s location within the AONB as the reason to propose less housing than is required. However, the Council’s evidence base demonstrates that there are suitable sites available, including the Land at Bridle, which can be developed without adverse impact on the AONB. The Council’s evidence base therefore confirms that it is possible to accommodate the housing requirement in Woodcote, whilst having regard to the AONB and the character of the village. This was noted by the Inspector for the SODC LP examination and is confirmed by the LCA.
- 5.3 The site promotion document previously submitted for land at Bridle Path demonstrates that the site is well related to the existing pattern of development and is physically and visually contained by a substantial landscape framework, including opportunities for further landscape enhancement. Carefully designed new development at the site would represent a logical rounding off opportunity of the built-up area without adversely impacting on the AONB landscape.

- 5.4 T A Fisher are keen to work collaboratively with the Parish Council, the NDPAG and the local community to bring forward the development site. Such development would provide a valuable contribution towards meeting Woodcote’s housing requirement whilst achieving a sustainable and sensitive form of residential development which has regard to the AONB landscape and supports the vitality and viability of Woodcote.
- 5.5 The draft WNDP2 does not meet the basic conditions and therefore should not proceed to Independent Examination.

B-4.3 Comments on the accompanying Representations

The submission above (Appendix B-4.2) from Pro Vision on behalf of the owner of the land behind Bridle Path (WNP2 Site WNP2-6) and a company with an interest in developing the land at Wood Lane (WNP2 Site WNP2-4) are almost identical. 80% of the paragraphs in the two submissions are the same and make the same points. All but one of the remaining 20% serve merely to identify the site being promoted. To avoid repetition the Parish Council respond only once to the duplicated points and separately to the site-specific points where this is necessary.

In these comments the Section refers to the Section of the Pro Vision submission.

B-4.3.1 Section 1 Introduction

This section:

- i. identifies the document as a submission on behalf of their client (Woodcote Properties Ltd, or T A Fisher) regarding the draft WNP2 Consultation Version April 2021 (WNDP2).
- ii. identifies the land the submission relates to Wood Lane (WNP2-6) or Bridle Path (WNP2-4).
- iii. notes that the sites have been promoted for allocation for residential development; and that neither site has been allocated in the consultation version of WNP2.

B-4.3.2 Section 2 Housing Strategy and Housing Need Assessment

Section or Paragraph	Comment	Parish Council Response
Paras. 2.1 to 2.11	In paragraphs Pro Vision argue that WNP2 fails to comply with policy H4 of the SOLP as the allocations in the new neighbourhood plan do not meet the allocation to Woodcote in policy H4 of the new SOLP and assert that an allocation less than that assigned to Woodcote in Policy H4 represents a ‘failure to meet the basic conditions’ because: <ol style="list-style-type: none"> i. the NPPF states “neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies”; 	NCR The Pro Vision response refers to SOLP35 Policy H4 as a strategic policy and thus asserts, on the basis of NPPF paragraph 29, that the allocation of fewer homes in the second Woodcote Neighbourhood Plan directly conflicts with a strategic policy (H4) and thus the NPPF. Woodcote Parish Council accept the requirement that neighbourhood plans should not promote less development than set out in the strategic policies of the Local Plan (SOLP35) and note that: <ol style="list-style-type: none"> i. Paragraph 21 of the NPPF states that <u>plans should make explicit which policies are strategic policies</u> and that these should be limited to those necessary to address the strategic priorities of the area to provide a clear starting point for any non-strategic

	<p>ii. the Inspector’s report notes that there is no reason why meeting the housing requirement should adversely affect the district’s two AONBs and it is not necessary to modify Policy H4 to provide greater flexibility to deliver homes because additional development anywhere within the plan area must comply with Policy ENV1 which protects the AONB; and</p> <p>iii. there is therefore no reasonable justification to depart from the housing requirement set by Policy H4 of the SODC LP.</p>	<p>policies that are needed and that strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.</p> <p>ii. Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates a further 79 policies (of the 102 in total) as strategic. Two of these strategic policies, H4 and ENV1 contradict themselves with respect to development in AONBs. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment.</p> <p>Woodcote is one of only two of the larger villages in the district wholly enclosed, and washed over, by the Chilterns AONB. As such new development will require greenfield sites in, and intrude into the landscape of, the AONB thus the allocations in WNP2 are supported by an LVIA.</p> <p>Woodcote Parish Council also note the submission of the Chilterns Conservation Board to the consultation on the SOLP35 which also draws attention to the lack of a case for a <i>‘mathematically-derived village growth percentage’</i> and the absence of evidence of exceptional circumstances or public interest. The Conservation Board also notes that:</p> <p>v. the NPPF is clear that LPAs should allocate land with the least environmental or amenity value (para 171) which will mean avoiding land in the AONB or its setting;</p> <p>vi. the Council has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty;</p> <p>vii. The NPPF paragraph 176 not only instructs that <i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues’</i> but also requires that <i>“The scale and extent of development within these designated areas should be limited”</i>.</p> <p>See section 4.2 of this document for further details</p>
<p>Paras. 2.12 to 2.17</p>	<p>Pro Vision contend that the Housing Needs Assessment is used to justify the allocation of 50-60 houses.</p>	<p>NCR Woodcote Parish Council do not understand this comment because the Housing</p>

		<p>Needs Analysis is not, and was not, used to justify the housing number. The number of new homes proposed derives directly from the need to find sites within the AONB that do not, as required by the NPPF and SOLP35 policy ENV1, damage the landscape of the AONB.</p> <p>Woodcote Parish Council have examined all possible sites in the parish and supported by a thorough Landscape and Visual Impact Assessment and considerations of environmental and social sustainability have concluded that the arithmetically derived allocation cannot be delivered whilst complying with requirements of paragraphs 174-177 of the NPPF and policy ENV1 of the SOLP35.</p> <p>Section 4 of this document contains further details.</p>
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B-4.3.3 Section 3 WNDP2 Evidence Base and Proposed Site Allocations

Section or Paragraph	Comment	Parish Council Response
Para 3.1	<p>Pro Vision:</p> <p>i. note that the supporting text to Policy H4 of the SODC LP explains that some villages are constrained by factors such as Areas of Outstanding Natural Beauty (AONB) and that a 15% growth may not be fully achievable and the requirement for evidence to support a higher or lower number than that provided in Policy H4.</p> <p>ii. assert that the WNP evidence base, which they list as a:</p> <ul style="list-style-type: none"> ▪ Housing Need Assessment; ▪ Major Development in the AONB note; ▪ Sustainability Assessment; ▪ Landscape and Visual Impact Assessment (LVIA); and ▪ a Biodiversity Report. <p>does not provide sufficient justification for proposing a lower housing allocation in Woodcote;</p>	<p>NCR</p> <p>Woodcote Parish Council believe the evidence presented to be robust, sufficient and proportionate.</p>

Para 3.3	Pro Vision say that the Major Development in the AONB 'note' simply reiterates national planning policy and guidance in terms of what constitutes major development in an AONB' and that each site should be assessed individually in terms of its impacts on the AONB landscape.	NCR Woodcote Parish Council understand that decisions on Major Development are influenced by the local context which is why each proposed site was assessed individually in terms of its effect on the landscape of the AONB. In so doing the Parish Council produced the 'note' as a guide to national planning policy and to avoid allocating sites that were likely to fall foul of this policy and, therefore not be deliverable.
Para 3.4	Pro Vision challenge the housing allocation in WNDP2 and state that 'It is clearly possible to accommodate the housing requirement in Woodcote, whilst having regard to the AONB and the character of the village, as noted in the Inspector's report on the examination of the SODC LP at Paragraph 49 where it was held that there was "no evidence that growth at the scale envisaged would harm the AONBs". Individual proposals will need to demonstrate good design and accord with other adopted policies including Policy ENV1 of the SODC LP which seeks to protect the landscape including AONBs.	NCR Woodcote Parish Council note that during the examination the Inspector found Policy H4 sound <u>subject to requirement that a Landscape and Visual Impact Assessment be produced for sites in the AONB (paragraph 4.28)</u> which, as explained is section 4.2 of this report is necessary to resolve a potential conflict between SOLP35 strategic policies H4 and ENV1.
Para 3.6 and 7	Pro Vision consider that an LVIA and SA is not necessary as SODC had already carried out both a Sustainability Appraisal and Landscape Capacity Assessment (LCA).	NCR Woodcote Parish Council note that the SODC Landscape Capacity Assessment did not assess all the potential sites in Woodcote and that for those sites that were assessed the assessment noted the need for LVIA's to confirm the suitability of the site and that these have not been produced. The Parish Council also notes the text accompanying SOLP35 policy H4 identifies the need for an LVIA where constraints such as the location within an AONB may limit development. Woodcote Parish Council further note the Sustainability Appraisal supporting the SOLP35 did not consider the sustainability impact of the potential development of greenfield sites extending the developed area of the parish into the AONB nor the other factors that contribute to sustainability locally.
Para 3.8	Both of the Pro Vision documents promoting their clients' land at Wood Lane and behind Bridle path note that the LCA produced to support the South Oxfordshire Local Plan 2035 did not exclude any of the 14 sites assessed in Woodcote; and that of those sites assessed <i>'the landscape capacity varies considerably with a number of sites</i>	NCR Woodcote Parish Council studied the South Oxfordshire LCA and note the following classifications and caveats in that assessment: i. all sites in Woodcote have a Landscape Strategy classification (using the enhancement strategy in the South Oxfordshire Landscape Character Assessment SPG) of Conserve ;

	<p><i>amended to show a 'reduced area' where development might be acceptable'</i></p>	<ul style="list-style-type: none"> ii. Conserve is a strategy applied where the landscape 'is of particularly high scenic quality, is unspoilt, retains a strong, intact landscape structure and sense of place, and often contains areas or features of ecological or cultural heritage significance. In these landscapes, conservation is an overwhelming priority in order to maintain landscape character and quality'; iii. sites WOO 5-8, 10, 11, the west part of 12 and 305 (using the site identifiers in the LCA) are located in LCA 8 (Chiltern Escarpment) and described as an 'Enclosed escarpment with High scenic quality, a Strong sense of place and in which Intrusive elements are uncommon. Sites WOO 4, 187 on the semi-enclosed dip slope are also described as having High scenic quality, a Strong sense of place with Occasional intrusive elements; iv. in all cases 'reduced' or very reduced' development is recommended subject to 'a full detailed landscape and visual impact assessment will be required to inform the final capacity of the site'; v. the assessors emphasise that 'it is important to note that this Study does NOT recommend the development of all the potential sites around each settlement. The object of the Study is to identify those sites which have the potential to be more suitable for housing from which South Oxfordshire District Council can select those sites it wishes to include to meet demand within the Local Plan period up to 2031'; and vi. The study analyses the capacity of sites in landscape terms (on the assumption that additional housing was acceptable) and set out recommendations for potential developable areas and the mitigation required should development go forward within the sites. <p>Woodcote Parish Council also note that:</p> <ul style="list-style-type: none"> i. previous applications to develop the land behind Bridle Path have been refused by SODC for reasons that include an unacceptable impact on the landscape of the AONB and an unjustified major development in the AONB; and ii. a recent application for development of the land at Wood Lane was refused because (i) the land lies beyond the edge of the village of Woodcote and (ii) 'the proposal would not constitute infill development and the principle of the development is therefore unacceptable'. The refusal also establishes that the development would extend the built-up limits of the settlement and would detract from the character and appearance of the site and this part of the Chilterns Area of Outstanding Natural Beauty contrary to NPPF and Local Plan policies.
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<p>Paras 3.8 to 3.11</p>	<p>Pro Vision note that:</p> <ul style="list-style-type: none"> i. the LCA was prepared for SODC by a qualified and chartered landscape practice. The WNDP2 LVIA on the other hand has been prepared by three Parish Councillors without any apparent landscape qualifications or professional landscape experience; and ii. “reviewed by” has been left blank. It therefore appears that this draft document has yet to be reviewed by an independent person or landscape professional. 	<p>NCR</p> <p>The Woodcote Landscape and Visual Impact Assessment uses the exact methodology accepted by South Oxfordshire District Council and the examiner in the Goring NP and has been professionally reviewed and updated by a chartered member of the landscape institute from LandArb Solutions Ltd, to ensure precise alignment with GLVIA3 and to produce a robust and, as required, proportionate assessment.</p>
<p>Par 3.11</p>	<p>Pro Vision:</p> <ul style="list-style-type: none"> i. accuse the Parish Council of a lack of impartiality ii. accuse the Parish Council of retrofitting the LVIA ‘to support the conclusions drawn by the Parish Council’ 	<p>NCR</p> <p>Woodcote Parish Council refute this allegation of essentially dishonest appraisal and are acutely aware that all assessment and evidence is subject to scrutiny by residents, agents promoting the sites of their clients, the Local Planning Authority and, ultimately, the examiner. The LVIA has been subjected to professional audit and, with some amendments, endorsed by a chartered member of the Landscape Institute.</p> <p>Woodcote Parish Council accept that the production of WNDP2 was severely disrupted and extended by the recent COVID pandemic and associated regulations but do not accept that the disrupted work programme in anyway changed the impact of development on the potential sites.</p>
<p>Para 3.12</p>	<p>Pro Vision assert that ‘in terms of the residential sites proposed for allocation in the WNDP2, there are some sites which would have a greater impact on the landscape than land at Wood Lane. Therefore, it is not clear why the WNDP2 has proposed WNP2-09 (Beechwood Court) for allocation, given this is much more disconnected from the ‘built area’ than land at Wood Lane or Bridle Path.</p>	<p>NCR</p> <p>The site referred to is an unused low-level, existing, block of offices with the capacity to be converted into flats. It is not an allocation of new land.</p>
<p>Para 3.13</p>	<p>Proposed sites WNP2-02 and 03 (Land behind Yew Tree Farmhouse) have no road frontage and would need to be accessed via a narrow track off Behoes Lane and there is limited, if any, scope for widening.</p>	<p>NCR</p> <p>Access has been discussed with the site owners and the track will be widened.</p>
<p>3.15 and 3.15</p>	<p>Pro Vision assert that:</p> <ul style="list-style-type: none"> i. the site promotion documents previously submitted for land at Wood Lane and Bridle Path demonstrate that the sites are suitable for development and can be developed 	<p>NCR</p> <p>Woodcote Parish Council note that recent planning applications for both these pieces of land have been refused, primarily on landscape grounds. Thus:</p>

	<p>sensitively to assist the community in meeting its unmet housing needs.</p> <p>ii. the land at Wood Lane is well related to the existing (and proposed, when taking into account land at Wood Lane’s relationship with WNP1-19) pattern of development. In terms of sustainability, land at Wood Lane is within close proximity (less than 200m) of services and facilities, including a bus stop and a Co-op food shop located on Bridle Path, whereas WNP2-02 and 03 are approximately 400m from these services and facilities and WNP2-09 over 700m from Co-op.</p> <p>iii. the land at Bridle Path is well related to the existing pattern of development. In terms of sustainability, land at Bridle Path is within close proximity (less than 200m) of services and facilities, including a bus stop and a Co-op food shop located on Bridle Path, whereas WNP202 and 03 are approximately 400m from these services and facilities and WNP2-09 over 700m from Co-op.</p>	<p>i. An application (P17/S3701/O) for 19 dwellings on the land at Wood Lane was refused because:</p> <ul style="list-style-type: none"> ▪ housing development would result in harm to, and loss of a greenfield site in, the AONB; ▪ the change in the site’s character, from open undeveloped land to a housing development and development of the dry valley would result in the loss of pasture, the loss of views of the open valley sides from parts of the footpath; ▪ that the consequent harm to the character and appearance of this part of the AONB would not conserve or enhance the landscape character of this part of the AONB as required by the NPPF, which places great weight on conserving and enhancing landscape and scenic beauty in AONBs. <p>ii. Two recent applications (P16/S3306/O and P18/S0004/O) to erect new homes on the land at Bridle Path were refused, among other reasons, because:</p> <ul style="list-style-type: none"> ▪ the land lies outside the existing settlement boundary, within a rural and largely unspoilt part of the Chilterns AONB; ▪ the existing settlement of Woodcote has little urban influence on the site, particularly in summer; ▪ there is a strong landscape objection to this development which is judged as harming the character of this part of the AONB, detract from the setting of the village and have an urbanising effect on a currently rural and unspoilt landscape; ▪ development on this particular site would result in the total loss of AONB landscape and have a materially harmful impact on the local landscape with no realistic prospect of that harm being fully moderated and represents sufficient harm to outweigh the acknowledged benefits this scheme would provide in terms of contributing towards housing need; ▪ development fails to comply with the NPPF and the SOLP35 policies that seek to protect the character of the countryside and preserve and enhance the special qualities of the AONB. <p>The District Council’s refusal of these applications also notes that even if the Council cannot demonstrate a 5-year land supply the NPPF requires that development should be refused when the adverse effects of development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or specific policies in the Framework indicate development should be restricted. There are specific policies in the Framework related to AONBs. Accordingly, the balance in favour of allowing development does not automatically apply. Given that the land is</p>
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		located within an AONB, the presumption in favour of sustainable development within the NPPF is not engaged. Furthermore, because large parts of the district are not within an AONB there is clear scope for providing new homes outside the AONB within South Oxfordshire and for such developments to contribute to any shortfall in the allocation noted by Pro Vision.
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B-4.3.4 Section 4 Other WNDP2 Proposed Policies

Section or Paragraph	Comment	Parish Council Response
Para 4.2	Pro Vision criticise this policy as ‘unnecessarily restrictive and indicates that any housing over and above the 133 figure or on sites not specifically allocated will not be entertained’ and suggest that the policy wording should be amended to read ‘ <i>Planning permission will be granted for a minimum of 225 new homes to be built in Woodcote in the period to 31st March 2035</i> ’.	CR Woodcote Parish Council accept that the wording of WNDP2 Policy H1 should be amended to read ‘ <i>planning permission will be granted for a minimum of 129 new homes to be built in Woodcote in the period to 31st March 2035 on the sites specifically allocated in the Woodcote Neighbourhood Plan</i> ’. The reasons for this are provided in Appendix B-3.2.
Paras 4.3 and 4.4	Pro Vision note that WNDP2 policy H3 (Affordable Housing) aligns with Policy H9 of the SODC LP but then suggest that, because of the expressed desire for more affordable homes in the parish and at district level, there is ‘no justification for WNDP2 Policy H8 – Scale of New Development, which states “ <i>proposals will be supported for a maximum of 30 new homes on any allocated site</i> ”. By limiting housing numbers at any one site, the WNDP2 will itself greatly affect and limit the level of affordable housing that can be provided’.	NCR Woodcote Parish Council accept the need across the district for affordable housing but note that: i. ‘more affordable’ housing does not mean more than will be delivered by development in the parish complying with the affordable housing requirement of SOLP35; ii. more affordable housing includes the goal of less expensive open market housing; iii. the affordability of new homes is a matter of the size of new homes as well as the nature of the ownership or tenancy and policies in the plan support the provision of more affordable homes locally by seeking to provide smaller (2- and 3-bed) homes; iv. the plan must conserve and enhance landscape in the AONB which means limiting the size of sites to avoid major intrusions into the landscape and to make effective mitigation possible; and v. the strong preference in the community for sites of less than 25 new homes. In drafting this plan the Parish Council has determined that sites of up to 30 new homes, a 3% increase in the size of the village, both meets viability and ‘low cost’ or affordable homes whilst complying with both the NPPF with respect to

		development in AONBs and the strongly expressed view of the community whose support is necessary at referendum.
Para 4.5	Pro Vision comment that several sites selected for allocation will be too small to deliver any affordable housing and that other sites may be subject to viability constraints and therefore fail to deliver affordable housing.	NCR Woodcote Parish Council cannot force landowners to release more land than they wish to make available but will take advantage of any suitable land that comes available for housing, however limited, that complies with the policies and guidance governing development in AONBs.
Paras 4.7 to 4.10	In paragraphs 4.7 of their submissions Pro Vision 'acknowledge the need to address and mitigate against the effects of climate change' but believe that the 'specific requirement' of WNDP2 policy D4 are not justified because SODC LP Policy DES7 – Efficient Use of Resources allows for flexibility by stating that <i>“new development is required to make provision for the effective use and protection of natural resources where applicable”</i> and suggests various measures that can be incorporated into development proposals and. Similarly, SODC LP Policy DES8 – Promoting Sustainable Design states, <i>“all new development...should seek to minimise the carbon and energy impacts of their design and construction”</i> and <i>“all new development should be designed to improve resilience to the anticipated effects of climate change”</i> .	NCR Woodcote Parish Council note: i. the recent (August 2021) Climate and Environment report from the International Panel on Climate Change that states 'The evidence is irrefutable: greenhouse gas emissions are choking our planet & placing billions of people in danger'; ii. the statement by the UN Secretary, António Guterres 'that we must act decisively now to avert a climate catastrophe', the alarm bells are deafening, and the evidence is irrefutable'; iii. South Oxfordshire District Council's recognition that the climate and ecological crises are the greatest challenges facing our society and their consequent: ▪ declaration in February 2019, of a climate emergency ; and ▪ goal of becoming a carbon neutral district by 2030 iv. the 6 priorities, listed below in the recent (October 2020) South Oxfordshire District Corporate Plan: 1. Protect and restore our Natural World 2. Openness and accountability 3. Action on the climate emergency 4. Improved economic and community well-being 5. Homes and infrastructure that meet local needs 6. Investment that rebuilds our financial viability v. That homes are responsible for some 18% of CO ₂ emissions; vi. the UK Government's commitment to reducing CO ₂ emissions; and vii. the wishes of the residents of Woodcote. This policy responds to the above. The measures are modest, relate strongly to the District Council's priority theme 3, and support SOLP35 policies DES9 Renewable and Low Carbon energy and DES10 Carbon Reduction
Para 4.11	Pro Vision also object to policy WNDP2 Policy D6 – Sustainable Transport which requires all new development	Woodcote Parish Council, as noted in paragraph B-4.4.4, support the SOLP35 and national government goal of reducing CO ₂ emissions. This WNDP2 policy contributes to

	<p>to provide “a. one electric vehicle charging point for houses with up to two bedrooms; b. two electric vehicle charging points for houses within three bedrooms or more; and c. secure bicycle storage facilities”. Pro Vision note that the comparative Policy TRANS5 – Consideration of Development Proposals in the SODC LP states that “proposals for all types of development will, where appropriate...be designed to enable charging of plug-in and other low-emission vehicles in safe, accessible and convenient locations”. It is considered that WNDP2 Policy D6 is again not justified and should be amended to better align with the flexibility of SODC LP Policy TRANS5.</p>	<p>that by removing a domestic obstacle to private vehicle purchasers in the parish buying an all-electric or a plug-in hybrid vehicle.</p> <p>Woodcote’s location, lack of services (The South Oxfordshire Settlement Assessment of 2017 ranks it 11th of 13 larger villages, even before the village lost its restaurant and its Post Office). The parish has no train station, no optician, and no dentist and an infrequent, unreliable bus service that make Wallingford, the nearest town all but inaccessible to older bus users, disabled bus users and mothers with young children in push chairs. The immediate outcome of this lack of services and public transport is a parish in which 60% of Woodcote household own two, or more, cars significantly higher than the rest of the district. The ability to charge two electric vehicles simultaneously is therefore important and the installation of charging points most cheaply installed when the dwelling is under construction.</p>
<p>Para 4.12</p>	<p>This paragraph in both submissions from Pro Vision repeat their objection to WNDP2 policy HS1 allocating fewer new homes than the allocation in the SOLP35.</p>	<p>NCR The reason for the difference is given in section 4.2 of this document.</p>

Appendix C South Oxfordshire District Council District Council

This appendix contains:

- i. a single response submitted online in respect of policy E5 – the designation of Local Green Spaces; and
- ii. a separately submitted response of some 43 pages containing over 80 criticisms and suggestions from the SODC Planning Policy Team.
In this larger response Woodcote Parish Council’s response can be mapped back to the original submission using the Reference number.

In responding to the submission, the Parish Council use the following codes:

- **NCR** No Change Required because, for example, the comment is supportive of a policy, statement or other part of the Plan;
- **NCR/OPS** No Change Required because the comment is on matters that fall outside the scope of a Neighbourhood Plan;
- **NCR/PAC** No Change Required because the comments apply to matters dealt with when a planning application is being considered by the Local Planning Authority;
- **CR** Change Required

Where helpful or necessary the decision is explained with added commentary. Note that the consultees’ comments often refer to paragraphs in the 2019 issue of the NPPF, the plan responses refer to the equivalent paragraphs in the 2021 issue of the NPPF.

C-1 On-Line Submission

Responder	Reference /Policy	Comment	Plan Response
38	E5	<p>Further consultation required in respect of designation of proposed LGS Location 4</p> <p>South Oxfordshire District Council is the freehold owner of a central piece of land bounded by Wittenham Close, Croft Way, Grimmer Way and Hagbourne Close (identified as Map Location 4 on Figure 9.ii Page 27), which the Neighbourhood Plan seeks to designate as a Local Green Space. As landowner, we are unaware of there being a restriction on the freehold title to this land which restricts its use to open space/green space and there has been no evidence produced in the consultation to support the requirement that the site is demonstrably special to the local community. The Council would like to reserve the right to object to such designation as it would likely impede any future plans for the property, such as bringing it forward for development.</p>	<p>Woodcote Parish Council have published the evidence with respect to this proposed designation⁴⁹ and is happy to discuss this with the appropriate SODC Officer.</p>

⁴⁹ Woodcote Neighbourhood Plan 2013-2035: Local Green Space Assessment

C-2 SODC Planning Policy Team Submission

C-2.1 Comments on Section 1: Introduction and Background

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
1	Foreword	Amend the bulleted point text <i>“give the village the potential to access Community Infrastructure Levy funding to improve village facilities”</i> to read <i>“give the Parish access to a higher proportion of Community Infrastructure Levy funding to improve Parish facilities;</i>	CR The Foreword has been reworded as advised
2.	Page 1- Neighbourhood Development Plan Context, point d	Add <i>‘as incorporated into UK law’</i> to the end of the sentence.	CR The Foreword has been reworded as advised
3.	Page 1- Plan Period, Monitoring and Review	It may be helpful to add more detail on how the Plan will be reviewed. For example, when the plan might be reviewed, either due to changes in national or local policy or periodically at set time periods. It may also be helpful to add more detail on how you envisage the plan will be monitored	CR The text has been reworded to include a review: i. should the needs and aspirations of the community require it; or ii. following significant changes to the South Oxfordshire Local Plan; or iii. after five years should neither of the previous conditions apply.

C-2.2 Comments on Section 2: Process Summary

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
4	Page 3 – Housing Need	This section sets out how a local housing need was established. However, no reference has been made to the South Oxfordshire Local Plan 2035 which sets out a housing requirement of 115 homes at Woodcote	NCR Woodcote Parish Council accept that the South Oxfordshire Local Plan 2035 set out a housing requirement of 115 at Woodcote.
		NPPF paragraph 65 requires the district council to develop	Woodcote Parish Council accept that paragraph 66

		<p>strategic policies setting out a housing requirement for each designated neighbourhood area. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.</p>	<p>(replacing para 65 in the 2021 version) of the NPPF require the district council to set a housing requirement, but note that:</p> <p>iii. Paragraph 21 of the NPPF states that <u>plans should make explicit which policies are strategic policies</u> and that these should be limited to those necessary to address the strategic priorities of the area to provide a clear starting point for any non-strategic policies that are needed and that strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.</p> <p>iv. Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates a further 79 policies (of the 102 in total) as strategic. Two of these strategic policies, H4 and ENV1 contradict themselves with respect to development in AONBs. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p>
		<p>As the district council has fulfilled its paragraph 65 requirements by providing a housing requirement figure in Policy H4 of the Local Plan, there is no reason or requirement for the Housing Needs Assessment (HNA) to undertake an alternative calculation unless you wish to gather evidence of additional local need to justify exceeding the requirement set in the Local Plan. This does not appear to be the case here.</p>	<p>NCR</p> <p>The district council did not demonstrate a need for the housing in Woodcote, a village entirely within and washed over by the Chilterns AONB but merely allocated the same arbitrary 15% growth as all large villages, most of which are not in or otherwise constrained by, an AONB.</p>

			<p>The Parish Council did not prepare a Housing Needs Assessment to challenge the allocation in the SOLP35 but to develop a greater understanding of the local need as a useful check on the allocation emerging from the evaluation of potential sites. Section 4 of this document contains further details.</p>
		<p>If your intention was to challenge the Housing Requirement Figure set in the Local Plan, this should have been done by means of representations through the Local Plan process, and not through the HNA. The HNA is a technical, impartial document that presents and analyses existing data (including any Housing Requirement Figure) rather than challenging it.</p>	<p>The intent is not to challenge the arithmetically derived requirement used in SOLP35. However, recognising that Woodcote’s location within the AONB requires special care when considering development and recognising that no evidence of special local need had been advanced in support of this proposed development in the AONB, the Parish Council conducted extra studies to ensure compliance with the NPPF in respect of development in AONBs.</p> <p>The Parish Council briefed contact members of the Planning Policy Team in meetings throughout the preparation of the Local Plan, in a meeting with the leader of the Council, and made representations to the consultation on the Local Plan and subsequently at the Local Plan hearings. Paragraph 4.28 was added as a result of these representations. Paragraph 4.28 acknowledges that <i>‘Some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones. Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB, a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable’</i> .</p> <p>Woodcote is one of only two villages in the district wholly enclosed by and swept over by the Chilterns</p>

			AONB. Section 4 of this document contains further details.
		<p>It is important to note that Neighbourhood plans should support the delivery of strategic policies contain in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (NPPF Paragraph 13).</p> <p>Policy H4 in the Local Plan is a strategic policy, setting out the requirement for Woodcote and the Woodcote Neighbourhood Plan Review should support this. The South Oxfordshire Local Plan 2035 was recently adopted in December 2020. Planning Practice guidance states that:</p> <p><i>'neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it.'</i></p>	<p>NCR</p> <p>Section 4.2 of this document identifies the conflict between the strategic policies H4 and ENV1 and explains how the allocation was derived using, as required, an LVIA to resolve the contradiction.</p>
		<p>It is also important to note that: <i>'Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.'</i> (NPPF paragraph 29)</p> <p>As currently drafted, the WNP2 does not have regard to the NPPF paragraphs set out above, and directly conflicts with policy H4 of the Local Plan, which is a strategic policy.</p>	<p>NCR</p> <p>Section 4.2 of this document identifies the conflict between the strategic policies H4 and ENV1 and explains how the allocation was derived using, as required, an LVIA to resolve the contradiction.</p>
		<p>We also note that in this section the third bullet point states, 'the views of owners and interested developers of potential sites'. However, the views of landowners and developers is not a housing needs issue and should not feed into the establishment of housing need</p>	<p>NCR</p> <p>The Parish Council accept that there is no relationship between the views of landowners and the housing need but note that views of landowners and interested developers determine whether a site is available for development and what type of development the owner/developer wishes to implement, e.g. residential or employment.</p>

C-2.3 Comments on Section 3: Goals and Objectives

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
5	Page 6- Planning Policies	<p>The paragraph <i>"The NPPF and both the Core Strategy and new Local Plan are strongly committed to conserving the nationally designated landscape of the AONB. In particular, the NPPF recognises the need for major development within an AONB to be justified by a local need that cannot be met elsewhere."</i> needs updating to remove thereference to the Core Strategy.</p>	<p>CR The words 'Core Strategy' have been removed.</p>
		<p>Paragraph 172 of the NPPF states that major development will only be appropriate in exceptional circumstances and where it can be demonstrated it is in the public interest. This paragraph should be amended accordingly to more accurately reflect paragraph 172.</p> <p>The NPPF includes a list setting out what the relevant considerations for planning applications for major development. Point a) states that national considerations should also be taken into account, and therefore it is not wholly accurate to state that development must be justified by a local need that cannot be met elsewhere.</p>	<p>Woodcote Parish Council accepts the NPPF requirement that the scale and development in designated areas such as the Chilterns AONB should be limited and that major development in AONBs will only be appropriate in exceptional circumstances and where it can be demonstrated that the development is in the public interest.</p> <p>Woodcote Parish Council note that South Oxfordshire District Council have not demonstrated that development in Woodcote is in the public interest and that the district council have not, as required by the NPPF, produced any evidence:</p> <ul style="list-style-type: none"> a) of the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) of the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way (noting the substantial excess of housing allocations over need in the Local Plan 2035; and c) that the effect (loss of greenfield and intrusions into a nationally designated landscape) would not be detrimental on the environment, the

			landscape and recreational opportunities, or made any attempt to suggest effective modification.
6.	Page 8 – Table 3.ii Housing	<p>The first bullet should be revised to state that affordable housing should meet the district-wide need not just Woodcote.</p> <p>The aim to limit new individual development to no more than 30 homes is overly restrictive and inappropriate in circumstances where the neighbourhood plan is not meeting the identified housing requirement.</p>	<p>CR The bulleted entry has been amended.</p> <p>NCR The Parish Council note this point but note that:</p> <ul style="list-style-type: none"> i. residents of Woodcote in consultations over the last decade have consistently expressed a very strong preference for sites of less than 10 houses. Recognising that such sites may not always be viable, the first NDP set a limit of 25 houses – this has been extended to 30 for the second NDP; and ii. the NDP is subject to a referendum and any attempt to introduce larger sites would inevitably meet with strong resistance and probably rejection at the referendum.
		<p>The aim to give preferential access to people with a strong local connection is not something which planning policies can control. It relates to the administration of a process, and it relates to the role of South Oxfordshire as the housing authority rather than its role as the planning authority.</p>	<p>NCR` Woodcote Parish Council note:</p> <ul style="list-style-type: none"> i. that South Oxfordshire District Council, and the Examiner, accepted this aim in the first NDP and, ii. local preferential access doesn't just apply to affordable housing it also applies to giving local people prior access to purchase houses – something that has been the subject of agreements between the Parish Council and the developers.

C-2.4 Comments on Section 4: Woodcote – Our Village

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
7	Page 9 – Figure 4.11 Parish Boundary	The map quality makes it hard to see the orange line on the map, we suggest you replace this map with a better-quality map. Please contact us if you need assistance	CR The map has been replaced with a better-quality version.
8	Page 10 – 4.2 Landscape	<p>Within this section reference is made to the South Oxfordshire Landscape Assessment and a direct quote taken from this document. However, this is not the most up to date information and evidence. Paragraph 7.8 of the Local Plan sets out:</p> <p><i>'The Council will use its evidence base on the district's landscape which currently includes the Landscape Character Assessment, Landscape Capacity Assessment and the Oxfordshire Historic Characterisation Project, to assess and determinedevelopment proposals.'</i></p> <p>These documents are available here, in the Council's Local Plan evidence base.</p> <p>The preparation of the neighbourhood plan should take these documents into account as well as any additional landscape capacity studies considering potential development sites in Woodcote.</p>	<p>NCR</p> <p>The Parish Council are aware that WNP2 should take the documents mentioned into account and does so, when appropriate. This section is providing a general introduction to the character of the landscape around Woodcote. A more detailed description can be found in the Landscape & Visual Impact Assessment produced by Woodcote Parish Council at the request of the Planning Policy team at South Oxfordshire District Council.</p> <p>The Parish Council also note the many faults in the landscape capacity assessment provided by South Oxfordshire District Council.</p>
9	Page 12- 4.5 Housing, Population	Is the 2019 population figure an estimation? If so, the paragraph should recognise this.	CR The text has been amended to change 'about 2600' to 'estimated to be 2600' number derived from detailed modelling using ONS and Electoral Roll data in the absence of a better estimate from the Planning Policy Team. Should such an improved estimate exist the Parish Council would immediately update this section to incorporate it.
10	Page 12- 4.5 Housing, Population- Footnote 14	Check this reference, there was no census in 2002 or 2017 so it would be good to check the data you are using. If these are population estimates what year was the release of the data you are you using?	NCR The data is taken from the 2011 census which shows a population of 2604. Updated estimates are produced annually by the ONS.

11	Page 12- 4.5 Housing,Housing	Reference required for the 2011 household figure, 2019 household figure and average number of people per household figure.	NCR Woodcote Parish Council do not understand this comment: i. Footnote 15 on page 12 clearly identified the source of the 2011 household number as the 2011 census. ii. The 2019 figure is simply derived from the 2011 figure plus the windfalls (taken from the South Oxfordshire District Planning Approvals register and the 76 new homes allocated in the Woodcote Neighbourhood Plan 2013 – 2027 iii. The average number of residents per household is then simply derived by dividing the number of residents by the number of homes.
12	Page 12- 4.5 Housing, Housing, affordable housing ratio	There are more up to date figures than the 2010 figure, available here , is there a reason for using this figure?	CR The ratio has been updated to reflect the latest ONS assessment.
13	Page 12- 4.5 Housing, Housing, Paragraphs 3 and 4	These paragraphs do not state the date that the data being presented represents, whereas the first two paragraphs do. It would be helpful and consistent to add the dates.	CR The paragraph references four sources. Three are dated, the fourth has had the date added.

C-2.5 Comments on Section 5: Neighbourhood Plan Policies

No Comments

C-2.6 Comments on Section 6: Community Well-Being Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
14	Page 15- Policy C1: Assets of Community Value	Policy C1 should be amended to ensure it is in accordance with Policy CF1 of the Local Plan. In particular, caveats should be added to state the loss of an Asset of Community Value will not be permitted unless; i. it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally	NCR Woodcote Parish Council note that: paragraph 16 of the NPPF requires that ' <i>plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area</i> ' and interpret this as a

		<p>convenient to the local community it serves and with equivalent or improved facilities;</p> <p>ii. it has been determined that the community facility is no longer needed; or</p> <p>iii. in the case of commercial services, it is not economically viable.</p> <p>As the policy only relates to Assets of Community Value the scope of the policy is limited. All community facilities, whether or not they are a registered Asset of Community Value, are considered the same by planning policy. We recommend you consider widening the scope of the policy and making it more locally specific by linking the policy to identified facilities that can be set out in the supporting text.</p>	<p>requirement that Neighbourhood Plans should not duplicate Local Plan policies and do not, therefore, believe it necessary to include the suggested text from the Local Plan into WNP2.</p> <p>NCR</p> <p>The only community facilities in Woodcote not designated as assets of community value are the green spaces, which have been designated as Local Community Green Spaces or the playground which is owned by the Parish Council.</p>
15	Page 16- Policy C3	<p>We note that the first part of the policy is very similar to policy NP18 of the made Benson Neighbourhood Plan. Please note that as this policy largely repeats the requirements in paragraph 113 of the NPPF there is a risk it could be deleted by an examiner in line with paragraph 16 of the NPPF which sets out that unnecessary duplication of policies should be avoided. You should also be careful to ensure your requirements are either aligned with the requirements in the NPPF or you have the necessary evidence to justify any departure.</p> <p>As currently drafted the neighbourhood plan policy appears to be going slightly further than the NPPF's encouragement of the use of existing masts, buildings and other structures for new electronic communications.</p>	<p>NCR</p> <p>Woodcote Parish Council accept that '<i>plans should avoid unnecessary duplication of policies that apply to a particular area</i>' but, as the South Oxfordshire commentator states '<i>the neighbourhood plan policy appears to be going slightly further than the NPPF's encouragement of existing masts</i>' and thus cannot be considered as duplicating the NPPF requirement. The Parish Council strongly support the provision of high-quality communications consistent with conserving and enhancing the landscape of the AONB (NPPF paragraph 176). In addition, the Parish Council notes that this is a retained policy from the current, made, Woodcote Neighbourhood plan which satisfied both South Oxfordshire District Council and the Examiner of the made Plan.</p>
		<p>The second paragraph of the policy is dealing with an administrative requirement. The examiner of the Benson Neighbourhood Plan commented on a similar policy: "<i>This policy imposes a requirement as to what documents must be</i></p>	<p>CR</p> <p>The policy has been amended as suggested.</p>

		<p><i>submitted with a planning application. That is not something that a neighbourhood plan policy can do. The documents which must accompany planning application will be set out in the District Council's Local Validation Checklist."</i></p> <p>For information, the South Oxfordshire validation checklist is available here.</p> <p>We recommend instead modifying the policy to state: <i>New residential development should provide for suitable ducting to enable more than one service provider to provide a fibre connection to individual properties from connection chambers located on the public highway, or some alternative connection point available to different service providers.</i></p>	
16	Page 17- Policy C4	<p>Point b of this policy requires amending in order to have regard to the NPPF. Paragraph 109 of the NPPF states that: <i>'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'</i></p> <p>Point b should not go beyond this, we suggest it is amended to: <i>'the particular proposal does not have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would not be severe'.</i></p>	<p>CR The policy wording has been amended as suggested.</p>
17	Page 18- Policy C5	<p>Paragraph 109 of the NPPF states that: <i>'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'</i></p> <p>The policy wording should therefore be amended to reflect this, as additional traffic congestion is not sufficient reason for a development proposal to be refused.</p>	<p>CR The wording of policy C5 has been amended.</p>
18	Page 18- Community Facilities	<p>Policy C5 previously marked as 'Developer Contribution' in Woodcote NP 2014 has been removed and/or replaced with 'Schools'. With the introduction of CIL in April 2016 it is unlikely</p>	<p>NCR/OPS Woodcote Parish Council are familiar with the move from Section 106 to Community</p>

		<p>that new S106 funding will be generated from developments as this is now only relevant to strategic sites. It is recommended that Woodcote parish council consider providing more content about the use of developer contributions and Community Infrastructure Levy (CIL) under 6.6 Community Facilities and include a CIL guidance section.</p> <p>It is also recommended that the parish council consider creating a list of infrastructure spending priorities. This could be contained within the Neighbourhood Plan or be a standalone document. This could consider how the parish council's CIL funding can be used, including identifying potential opportunities to work collaboratively with the district and county council, to deliver the infrastructure identified as required to address the demands of development (we understand that this list might change over time for which the necessary flexibility is provided within CIL Regulation). This could also help the parish council audit existing facilities and capture opinion of needs and wants of the residents to achieve the best use of funding sources for the benefit of the community.</p> <p>Woodcote parish council will continue to receive 25% of CIL revenue to spend on local projects in line with CIL regulations as they have an adopted Neighbourhood Plan in place.</p>	<p>Infrastructure funding and have assembled a list of potential uses of CIL monies in the parish pursuant to the production of a list of spending priorities. Woodcote Parish Council see this as an exercise distinct from the Neighbourhood Plan and requiring additional consultation albeit that many of the items on the list derive from community consultations over the past decade.</p> <p>The Parish Council note, however, that a S106 agreement was part of the planning permission issued for the Chiltern Rise/Garden Centre site (sites WNP-1-01 and WNP1-02), neither of which is a strategic site.</p> <p>Woodcote Parish Council is fully aware of the CIL arrangements and the amount of CIL that we receive!</p>
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C-2.7 Comments on Section 7: Traffic and Transport Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
19.	Page 21- Policy T1	Paragraph 111 of the NPPF sets out that developments that generate significant amounts of movement should be required to provide a travel plan. The second sentence of the policy should be amended to reflect this, as currently it states that any development proposal that involves an increase in traffic generation, no matter the scale, would be required to produce a	NCR Woodcote Parish Council are aware of the statement in paragraphs 111 and 113 of the NPPF (replacing paras 109 & 111 in the 2021 issue) but note that 'significant' is not defined presumably because local circumstances are a key factor in

		<p>travel plan and transport statement. This is not proportionate.</p> <p>In addition, paragraph 109 of the NPPF is relevant here as well. Where the policy states “that they do not further inhibit the free flow of traffic or exacerbate conditions of parking stress, including conflict with larger vehicles, particularly in the following areas” this will need to be amended in accordance with paragraph 109 which states:</p> <p><i>‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’</i></p>	<p>determining what is, or is not, significant. Policy T1 identifies three areas where current traffic volumes and congestion both inhibit free flow and create a hazard to road users and pedestrians, including school children. Woodcote Parish Council:</p> <ol style="list-style-type: none"> i. note that this policy is a retained policy that was accepted by both South Oxfordshire District Council and the Examiner in the current made Neighbourhood Plan; ii. suggest that proportionality is a matter for the planning officer, who can determine the local significance of additional traffic, when determining planning applications in Woodcote.
20.	Page 20 – Policy T5: Traffic Calming along Goring Road	<p>To ensure that the policy is able to respond to different scales and types of development, we recommend, <i>‘Where necessary and appropriate’</i>, is inserted at the start of the policy.</p>	<p>NCR</p> <p>Woodcote Parish Council note that this policy is retained from the current made neighbourhood Plan and has, therefore, been deemed acceptable by both South Oxfordshire District Council and the Examiner.</p>
21.	Page 21 – Policy T7: Residential Car Parking Spaces	<p>Whilst we appreciate part of this policy is carried over from the adopted WNP1, we have concerns over the implementation of the policy. Development management have noted difficulties with Policy T8 in the past, as providing one parking space per bedroom means that there is a lot of hardstanding and less space on site for landscaping, creating a harsh urban environment.</p> <p>Other neighbourhood plans since WNP1 have tried to introduce parking standards, for example, most recently in Wallingford (the examiner’s report is available here). The examiner was not satisfied that the Plan’s approach was underpinned with compelling evidence. The examiner also set out how the responsibility of new development is to accommodate its own parking requirements rather than to</p>	<p>NCR</p> <p>Woodcote Parish Council understands the challenges faced by Development Management and are pleased with the greatly improved, cooperative working resulting from the making of the current Neighbourhood Plan.</p> <p>The Parish Council understands that other Neighbourhood Plans have not succeeded in establishing such a policy but note that a small, congested village entirely surrounded and washed over by the AONB faces different challenges to that of a town substantially larger than Woodcote and that the key part of the policy is retained from the original policy in WNP1 which was accepted by</p>

		<p>resolve pre-existing issues.</p> <p>We have concerns that both elements of the policy lack the evidence to support such a restrictive approach to parking.</p>	<p>both South Oxfordshire and the Examiner for inclusion in the current made Neighbourhood Plan.</p> <p>This policy is not an attempt to ameliorate the impact of pre-existing conditions. The policy is designed to avoid new development sites suffering the dangerous, congested, situation of, say, Wayside Green which will not be relieved by requiring off-street parking for houses on the Reading Road.</p> <p>Poor public transport has contributed to car ownership being higher than elsewhere in South Oxfordshire and that past developments have not anticipated this level of car ownership such that a significant number of households do not have sufficient off street parking spaces and leave vehicles at the roadside. Adequate off-street parking is an essential contributor to community and local economic well-being, to the safety of road users and pedestrians and the free flow of local traffic. This policy aims to ensure that new developments throughout the village do not repeat past mistakes and exacerbate an already serious problem.</p>
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C-2.8 Comments on Section 8: Employment and Skills Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
22.	Page 22 – Policy EM1:Heavy Goods Traffic (Retained Policy)	Paragraph 111 of the NPPF sets out: <i>'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or</i>	NCR Woodcote Parish Council are fully committed to supporting the growth of local business in the parish and understand that a Neighbourhood Plan

	<p><i>transport assessment so that the likely impacts of the proposal can be assessed.'</i></p> <p>Paragraph 109 of the NPPF sets out: <i>'Development should only be prevented or refused on highways ground if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.'</i></p> <p>As worded this policy is overly restrictive, requiring any proposal for change of use to B2 or B8, or other uses which would generate heavy goods traffic, requiring the submission of a Transport Statement to demonstrate that the proposal will not have an unacceptable traffic impact. As set out above, paragraph 111 of the NPPF is clear when a transport assessment or transport statement is necessary and this applies to all forms of development, not just those listed in Policy EM1. Paragraph 109 is clear that only when there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe, should development be prevented or refused. As worded, Policy EM1 does not have regard to these relevant NPPF paragraphs and therefore we recommend this policy is modified. For example, replace 'must demonstrate with... within the village' with:</p> <p><i>'will be supported where they do not have an unacceptable impact on highway safety, or would not result in a severe residual cumulative impact on the road network. All development proposals generating significant amounts of movement will require Travel Plans.'</i></p>	<p>must comply with the requirements of paragraphs 111 and 113 of the NPPF ((replacing paras 109 & 111 in the 2021 issue).</p> <p>The Parish Council note, however, that paragraph 111 refers to, but does not define, '<i>significant amounts of travel movement</i>'. Woodcote Parish Council believe that this is because the NPPF recognises that local factors will contribute to a determination of what constitutes a significant amount locally. Equally paragraph 113 requires development to be prevented or refused only '<i>if there would be an unacceptable impact on highway safety or the residual cumulative impact on the road network would be severe</i>'. A judgement that can only be made with reference to the specific traffic and highway safety considerations applying around the proposed development</p> <p>The retained policy EM1, previously accepted by South Oxfordshire District Council and the examiner of the current made Woodcote Neighbourhood Plan, is entirely consistent with both paragraphs 111 and 113 and will allow South Oxfordshire's Development Management team to exercise their judgement as to whether the development would generate significant amounts of movement or produce a severe <i>residual cumulative</i> impact on the road network would be severe.</p>
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C-2.9 Comments on Section 9: Countryside and Environment Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
23.	Page 23- Policy E1	<p>The first sentence could be amended to make it clearer. For example, <i>'For the allocations in this plan or any application for major development, a landscape strategy...'</i></p> <p>What constitutes major development in the AONB is for the decision maker to determine, in accordance with footnote 55 of the NPPF, not District-wide policies, so the amendment above covers what you are looking to achieve whilst providing greater clarity to the policy.</p> <p>We would also recommend <i>'where relevant'</i> is inserted after <i>'...following details'</i>. The criteria in this policy relate to an administrative issue and should be used to guide proposals. It cannot be a requirement to address these points, as that would be overly prescriptive and unduly onerous.</p>	<p>CR The policy has been amended as suggested.</p> <p>CR The policy has been amended as suggested.</p>
		Point b. is asking for a baseline ecological survey; however, it is likely that an ecological survey would sit separately to any landscape assessment/strategy. It would be unduly onerous to ask for an ecological survey as part of the landscape strategy, the Plan can have other policies focusing on ecology.	<p>CR This requirement has been moved to policy E3: Biodiversity and Wildlife Support</p>
		Comments from our Landscape Officer: Item d requires clarification, I would suggest this is reworded as <i>'an analysis of both near and distant views from principal public vantage points and the effect of proposed development and any planting mitigation in these views'</i> . This would fall outside the usual scope of a landscape strategy so the introductory wording could be amended to <i>'... a landscape strategy and visual analysis '</i> .	<p>CR The policy sub-paragraph has been amended as suggested.</p>
24.	Page 23 – Policy E2	The adopted South Oxfordshire Local Plan has policies concerned with the historic environment, policies ENV6 – ENV10. The NPPF sets out that plans need to serve a clear purpose and avoid unnecessary duplication of policies. As drafted Policy E2 does not add any locally specific details.	<p>NCR Woodcote Parish Council understand the need to avoid duplication and, as this policy shows, support the historic environment policies in the Local Plan 2035. However, this retained policy was</p>

		<p>Have you considered producing a list of non-designated heritage assets? More information is set out in Historic England’s guidance on local heritage listing, available here.</p>	<p>specifically welcomed by Historic England and has, therefore, been retained.</p> <p>Woodcote Parish Council is supportive of the suggestion to produce a list of non-designated assets and would draw attention to sub-item number iv of Section 13.1 of this Plan which recommends the Parish Council to consider establishing a working group to identify candidates for non-designated heritage status.</p>
25.	Page 23 – 9.3 Countryside and Environment	<p>Our Ecology Officer commented that the supporting text in this section could be strengthened to reflect the 10% net gain referenced in the policy. This is particularly important as the Environment Bill is not yet in force. To help justify the 10% requirement, historic losses of biodiversity from the Parish could be referenced, highlighting the need to leave the biodiversity of the Parish in a measurably better state than it is currently.</p>	<p>CR</p> <p>The ecological importance of Woodcote (as assessed by the Oxfordshire Wildlife and Landscape Study) has been added to demonstrate the high ecological value of 85-90% of the land in the parish. http://owls.oxfordshire.gov.uk</p>
26.	Page 24- Policy E3	<p>Whilst we encourage the inclusion of a policy focusing on biodiversity, we believe it is important to make you aware that as currently drafted, the policy may not succeed at examination. This is because the policy is justified by proposals in the Environmental Bill 2019-21, which could still be amended or fall. Hopefully as your plan progresses, you will get more certainty on this matter. In the meantime, please see the suggestion in the comment above about how to improve the chances of success of your policy.</p> <p>In addition, in the first sentence the use of the term ‘wildlife’ is quite ambiguous, particularly when looking to measure against a recognised biodiversity metric. We would advise you substitute the term ‘wildlife’ for ‘biodiversity’ to be consistent with Policy ENV3 in the Local Plan.</p>	<p>NCR</p> <p>Woodcote Parish Council understand the status of the Environmental Bill but neither mention nor rely on the Bill. This policy stands as a contribution to the NPPF, Local Plan and residents’ desire to support ecological improvement. If the Bill succeeds, then this will strengthen our ability to support and enhance biodiversity – if it doesn’t then we have this policy to support the intent of the NPPF and Local Plan 2035 locally.</p> <p>CR</p> <p>The text has been amended as suggested.</p>

27.	Page 25 – Fig 9.1	<p>The settlement boundary map does not show the whole boundary. The map needs to show the full extent of the settlement boundary in order to be able to provide the necessary clarity.</p>	<p>NCR The settlement boundary is complete, and this comment is not understood. Three small outlying areas with buildings are excluded following application of the methodology provided by the WNP2 paper 'Settlement Boundary'.</p>
		<p>The NPPG sets out that proportionate, robust evidence needs to support choices made and those policies need to be concise, precise and supported by appropriate evidence. The Plan and supporting documents do not contain any evidence to support the settlement boundary, the only narrative provided states:</p> <p>'The boundary has been drawn to reflect the present, observable, developed edge of the village and makes provision for the proposed development schemes set out in policies HS2-HS10, whilst protecting the village from unwanted development on the edge of the village that would cause harm to the AONB.'</p> <p>We recommend that you expand on the methodology used to define the settlement boundary to better support proposed Policy E4. It should also be noted that it is not appropriate for the neighbourhood plan to refer to 'unwanted development', the focus instead should be on the types of development that are appropriate inside and outside the boundary.</p>	<p>CR Woodcote Parish Council is aware of the need to provide an explanation of, and justification for, the methodology employed to identify the settlement boundary. More details of the reasons for the Settlement Boundary have been added together with a reference to the publication describing the methodology used to determine the Settlement Boundary.</p>
		<p>We note that as currently worded, the first part of policy E4 refers to infill development only. We recommend adding reference to redevelopment.</p>	<p>CR The policy text has been amended as suggested.</p>
28.	Page 26- Policy E5	<p>More evidence is required to support the allocation of the Local Green Spaces. When preparing this evidence regard should be had to paragraphs 99 and 100 of the NPPF which sets out the tests a Local Green Space allocation should meet:</p> <p><i>'99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and</i></p>	<p>CR Woodcote Parish Council is aware of the need to provide evidence in support of the allocation of Local Green Spaces and has produced a Local Green Space Assessment which tests the candidates for designation against the criteria identified in the NPPF.</p>

	<p><i>protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.</i></p> <p><i>100. The Local Green Space designation should only be used where the green space is:</i></p> <p><i>(a) in reasonably close proximity to the community it serves;</i></p> <p><i>(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></p> <p><i>(c) local in character and is not an extensive tract of land.'</i></p> <p>The description provides a factual description of the sites, it does not address all the key issues as set out in national policy, which are:</p> <ul style="list-style-type: none"> • The extent to which the proposed Local Green Space is in reasonably close proximity to the community it serves; • Whether the proposed Local Green Space is demonstrably special to the local community and holds particular significance; • Whether the proposed Local Green Space is local in character; • Whether its designation is consistent with sustainable development in the local area; and • Whether the proposed Local Green Space is capable of enduring beyond the end of the Plan period. <p>An easy way to present this information is in a table format, explaining why under each of the headings above, the proposed Local Green Spaces are suitable. An example of the type of evidence can be found by looking at the Local Green Space</p>	<p>A reference to the publication providing the assessment has been inserted into the NP.</p> <p>The Local Green Space Assessment Paper contains, in a series of tables, the evidence supporting each proposed designation.</p>
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		Report of the Cumnor Neighbourhood Plan which was recently examined, available here .	
		<p>In line with national guidance (link here) please ensure that landowners have been contacted about any proposal to designate any part of their land as Local Green Space.</p> <p>For clarity, you may also want to consider producing individual maps for the proposed Local Green Space designations as the scale of Figure 9.ii is quite large</p>	Woodcote Parish Council is aware of the need to obtain the permission of local landowners should land owned by them be submitted for designation and, as is evident in the Local Green Space Assessment, where necessary the landowner has been contacted.
29.	Page 27/28 – Policy E6: Important Views	<p>As set out in national guidance, policies need to be supported by appropriate evidence. It is not clear what evidence is supporting the identified views, the photos provided in Appendix E are not enough. More evidence should be provided as to why the views are valued, either as supporting text or as an appendix.</p> <p>Little Milton or East Hagbourne Neighbourhood Plans are examples you can refer to which have good supporting evidence for their identified views.</p> <p>As worded the policy lacks the clarity required by national policy. Policy ENV1: Landscape and Countryside in the Local Plan sets out: <i>'South Oxfordshire's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of South Oxfordshire's landscape, in particular: viii) important views and visuals sensitive skylines;'</i></p> <p>The focus of the policy should align with Policy ENV1 from the Local Plan, protecting against harm and enhancing features where possible. We recommend the second paragraph is replaced with wording such as: <i>'Development proposals should preserve or enhance the local character of the landscape and through their design, height and</i></p>	<p>CR</p> <p>A reference to the publication Protected Views' which provides the required evidence has been inserted into the NP.</p>

		<p><i>massing and should recognise and respond positively to the various Important Views. Development proposals which would have a significant adverse impact on an identified Important View will not be supported.'</i></p> <p>Comments from our Landscape Officer: There seem to be a high number of important local views of the characteristic AONB landscape. Judging from the photographs included, some views do not seem to represent any particularly special qualities, it might help to review these in relation to the AONB characteristics they display.</p>	
30.	Page 29 – Policy E7:Solar Energy Array	<p>Replace 'subject to compliance' with '<i>having regard to</i>'. Reference is made to 'Chiltern Conservation Board', we assume you are referring to the Chilterns ANOB Management Plan 2019-2034, therefore this document should be referred to. This document does not form part of the development plan and has not been examined, therefore proposals can only be expected to have regard to it.</p>	<p>CR The policy has been amended as suggested</p>

C-2.10 Comments on Section 10: Housing Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
31.	<p>Page 31 – The Number of New Homes</p> <p>'Woodcote Parish Council has reviewed the requirement for new housing in Woodcote between 2011 and 2035 and concluded that an additional 50 to 60 new homes will be needed between 2027 and 2035 to bring the total new housing requirement for 2011 to 2035 to some 133 (see table 10.i for breakdown of the housing numbers). Further details</p>	<p>This ignores the requirement set out in the Local Plan. If you have identified a local need for 50 to 60 new homes, it is important that you clarify if this local need sits within the requirement identified in the Local Plan or whether this is to be delivered in addition to the 115 houses requirement.</p> <p>Please see our comment below on H1 for further comments on the number of new homes.</p>	<p>NCR</p> <p>Table 10.i in the pre-submission version of the draft WNP2 clearly shows the 50 to 60 to be IN ADDITION to the 76 of the made Woodcote Neighbourhood Plan. In addition, the paragraph quoted in the South Oxfordshire comment contains the wording '<u>to bring the total new housing requirement for 2011 to 2035 to some 133</u>'</p> <p>The number is established following, as instructed by SODC at a meeting with officers on 14-Oct-20 and required by paragraph 4.28 of the Local Plan 2013-</p>

<p>of the housing requirement and landscape assessment are in Appendix D.’</p>		<p>2035, a Landscape and Visual Impact Assessment.</p> <p>Woodcote Parish Council is also mindful, given the settlement’s location in the Chilterns AONB, of the concerns of the Chiltern Conservation Board in its submission to the Local Plan consultation (Dr Lucy Murfett 12-Feb-2019) in which the Board point out that the Local Plan ‘correctly explains that <i>The NPPF is clear that Local Planning Authorities should, as a minimum provide for the objectively assessed needs for market and affordable housing in their area</i> but it fails to mention that para 11 of the NPPF goes on to set out an important caveat <i>unless the application of other policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the area.</i></p> <p>The NPPF footnote then lists assets that provide a strong reason for restricting development as: <i>habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority).</i></p> <p>The housing allocation suggested for the parish is derived as a blanket 15% to larger villages. The Local Plan provides no strong reasons for ignoring the location of the Parish in the AONB nor any assessment of the cumulative impact of new development in Woodcote which, in practice, means housing development on AONB green field sites at the edge of the settlement. Whilst wishing to find sites for the number of new homes suggested in the Local Plan 2013-35 Woodcote Parish Council has</p>
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			<p>sought, through a detailed assessment of all potential sites and an LVIA to obtain the maximum number of new homes consistent with enhancing and conserving the AONB.</p> <p>The purpose of estimating the housing need will be clarified in WNP2.</p>
32.	Page 31- Policy H1	<p>Please see our comments relating to your Housing Needs Assessment (HNA) and the comments above relating to housing numbers which also apply here.</p> <p>As explained earlier in this response, paragraph 65 of the NPPF sets out that strategic policies should provide a housing requirement figure for neighbourhood areas, and that once the strategic policies have been adopted they should not need re-testing at a Neighbourhood Plan examination.</p> <p>Policy H4 of the South Oxfordshire Local Plan sets out the requirement for Woodcote, this is also shown in table 4f of the Local Plan. The housing requirement for Woodcote is 115 homes.</p> <p>The Neighbourhood Plan is carrying forward the majority of its allocations from WNP1 and it allocates for a further 57 homes. The reasoning for this is explained as being due to a housing needs assessment undertaken by the NDP group.</p> <p>However, as a housing requirement has been provided to Woodcote through a strategic policy in the Local Plan, in</p>	<p>NCR</p> <p>Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates a further 79 policies (of the 102 in total) as strategic. Two of these strategic policies, H4 and ENV1 contradict themselves with respect to development in villages constrained by AONBs. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p> <p>Section 4.2 of this document identifies the conflict between the policies H4 and ENV1 and explains how the allocation was derived using, as required, an LVIA to resolve the contradiction.</p> <p>The consultation version of the pre-submission version of WNP2 is carrying forward ALL of the allocations from the current made Neighbourhood Plan.</p> <p>The Parish Council did not prepare a Housing Needs Assessment to challenge the allocation in the</p>

	<p>accordance with the NPPF, this figure does not need re-testing. If your intention was to challenge the Housing Requirement Figure set in the Local Plan, this should have been done by means of representations through the Local Plan process, and not through the HNA. The HNA is a technical, impartial document that presents and analyses existing data (including any Housing Requirement Figure) rather than challenging it.</p> <p>Paragraph 4.28 of the Local Plan explains how neighbourhood plans should deal with factors that may potentially constrain the supply of new homes and the capacity of the settlement to deliver the housing requirement. It sets out:</p> <p><i>'Some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones. Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB, a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable. Other villages are unconstrained and can plan for more than 15% growth. The level of growth proposed should be evidenced within the Neighbourhood Development Plan with local communities helping to shape the development of their village. <u>Ultimately the detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of capacity, whether this is to support a higher or lower number than that provided in Table 4f: Provision of homes at Larger Villages.</u> Neighbourhood planning groups will need to cooperate with infrastructure providers and statutory consultees to provide this evidence and develop viable solutions for any infrastructure provision that is needed.</i></p> <p>We have emphasised the relevant sentence highlighting that evidence is needed to support a higher or lower level of growth. The evidence base supporting WNP2 does not demonstrate that</p>	<p>SOLP35 but to develop a greater understanding of the local need a useful check on the allocation emerging from the evaluation of potential sites. Section 4.2 of this document contains further details.</p> <p>Woodcote Parish Council are familiar with paragraph 4.28 of the Local Plan which we note was amended to acknowledge the difficulties of settlements like Woodcote which, totally constrained by the AONB, struggle to find locations for new development that are consistent with the NPPF requirement to 'conserve and enhance the AONB' and SOLP35 strategic policy ENV1.</p> <p>Woodcote Parish Council note that SOLP35 policy ENV1 requires:</p> <ul style="list-style-type: none"> vi. The highest level of protection to be given to the landscape and scenic beauty of the Chilterns Area of Outstanding Natural Beauty; vii. development in an AONB or affecting the setting of an AONB will only be permitted where it conserves, and where possible, enhances the character and natural beauty of the AONB; viii. development in an AONB will only be permitted where it is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB; and ix. development proposals that could affect the special qualities of an AONB (including the setting of an AONB) either individually or in combination with other developments, should
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		<p>Woodcote does not have capacity to accommodate the requirement set out in Policy H4, which has been tested through a Local Plan examination.</p> <p>A housing needs assessment may identify that additional allocations should be made, but it does not address the capacity of the village, nor does provide justification for not delivering the requirement set out in the Local Plan.</p> <p>We therefore advise that further site allocations are necessary to</p>	<p>be accompanied by a proportionate Landscape and Visual Impact Assessment. AONB Management Plans will be a material consideration in decision making.</p> <p>Woodcote Parish Council further note that the Local Plan provides a blanket allocation to all the larger settlements ignoring factors such as their location in an AONB, fails to provide the evidence that development on the scale of the arithmetically derived housing allocation for Woodcote would conserve and enhance the AONB, and fails to demonstrate that the arithmetically derived allocation in any way is appropriate to the economic and environmental wellbeing in this part of the AONB.</p> <p>As noted in Section 4.2 of this document an arithmetically derived allocation for development in the AONB fails to meet the requirements of Local Plan 2013-35 policy ENV1 and, for reasons given above, have determined that further allocations cannot be found without damaging the AONB and, as such, failing to comply with policy ENV1 and the relevant NPPF requirements.</p> <p>The strengthened requirement to enhance the AONB in the NPPF and the inappropriateness of a mathematically derived allocation that takes no account of the AONB was highlighted by Dr Lucy Murfett in her letter to SODC on 21 August 2018.</p> <p>The capacity of the village has been assessed by carrying out a Landscape and Visual Impact Assessment, as required by paragraph 4.28 of the Local Plan and as requested by Planning Policy</p>
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		meet the housing requirement for Woodcote as set out in the Local Plan. This is necessary to help ensure the plan is in general conformity with strategic policies in the development plan and has regard to national policy and guidance.	Officers in a meeting on 14 Oct 2020. The Housing Needs Assessment was carried out as an independent exercise to assess whether the number of houses that can be accommodated in the village at least meets the local needs. The Housing Needs Assessment was not, in any way, used to determine the capacity of the village for development.
		We note that WNP1 contained 2 reserve allocations which have not been carried over into WNP2. These were noted as contingency sites, capable of delivering 20 and 16 homes respectively at the time. It is not clear why these sites are not being taken forward. Given that they were previously reserve allocations, and that the plan is not currently meeting its identified housing requirement, it would be helpful to set out your rationale and changing circumstances relating to the availability, suitability and deliverability of these sites.	The two reserve sites mentioned have not been allocated because: <ul style="list-style-type: none"> i. Reserve Site 1: Land adjacent to Bouchier Fencing The Parish Council received a letter (dated 2nd May 2017) from the owner of the land stating unequivocally that the site was not available for development; and ii. Reserve Site 2: Land to the north of Chiltern Rise Cottage When preparing WNP1 SODC's Landscape officer identified the entire Chiltern Rise site to be of high ecological value and unsuitable for development. The Chiltern Rise reserve site is part of the same field and, therefore, has the same ecological value thus, given the concerns of the landscape officer, it was not deemed suitable for development.
		It is also important to ensure you optimise the density of development in line with policy STRAT5 in the Local Plan.	NCR STRAT5 does not set a density requirement for the larger villages. It does, however, recognise the need to: <ul style="list-style-type: none"> i. sustain an appropriate mix of uses (including green space and other public space); ii. respect local character; iii. protect and enhance the AONB; and iv. minimise the detrimental impacts on amenity of future and/or adjoining neighbours.

		<p>Please see comments relating to sites WNP2-02 and WNP2-03 which could be considered together to make a more efficient use of the land. We note that the 'Landscape Capacity Assessment for Sites on the Edge of Larger Villages of South Oxfordshire', considered the sites together and identified a potential capacity of 21, which is more than currently proposed in WNP2. This document is available here. In accordance with the Local Plan, it may be useful to assume a density of 45 dwellings per hectare (dph) for all sites, and caveat this with 'subject to master planning'. This will help to maximise housing delivery whilst recognising that 45dph may not be appropriate for all sites allocated.</p>	<p>Woodcote Parish Council take seriously the requirement to maintain the local character and use land efficiently whilst protecting and enhancing the AONB and believe that a target density at 30 dph allows for adequate provision of green spaces and is appropriate to developments on the edge of a settlement in the AONB.</p> <p>In so doing Woodcote Parish Council takes note of the Chiltern Conservation Board's (Dr Lucy Murfett 14-Feb-2019) response to Q 56 of the consultation on the Local Plan which states that residential densities are too high for AONB villages and that, rather than putting the onus on the developer to show why densities of 45 dph cannot be achieved in larger villages developers should, in AONB villages have to justify densities above 25dph.</p> <p>The 'Landscape Capacity Assessment for Sites on the Edge of Larger Villages of South Oxfordshire' wrongly considered the two sites as a single site and failed to check whether:</p> <ul style="list-style-type: none"> i. the sites were under single ownership; and ii. the wishes of the owners. <p>WHP2-02 and WNP2-03 are under separate ownership and the owners are not prepared to release all the land for development. Both owners wish to retain space for paddocks. In the case of WNP2-03, a green space buffer has been included to protect the amenity of neighbours in Beech Lane.</p> <p>Woodcote Parish Council also note that the Landscape Capacity Assessment referred to indicated for every site that "A full detailed landscape and visual impact assessment will be</p>
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			<p><i>required to inform the final capacity of the site. A lower density may be necessary to avoid visual intrusion from the built form.” Woodcote Parish Council have now carried out a Landscape and Visual Impact Assessment for all the sites.</i></p>
		<p>The location of some of the proposed allocations, leaves gaps between either the existing built form of the village, or existing allocations. For example, to the west of WNP2-30, there would be a reduced gap between the site and the existing built form. Whilst there are nearby listed buildings which might limit development, it is important to consider if there would be capacity for more.</p> <p>Between WNP2-33 and WNP1-19, there would be a linear gap between proposed development, perhaps a more joined-up approach across this whole area would be more appropriate and achieve higher number</p>	<p>The gap to the west of WNP2-30 has been included at the insistence of the owner who has not made the land available for development. It also serves as a buffer between the development and the listed buildings.</p> <p>The gap between WNP2-33 and WNP1-19 is a separate site that has been evaluated in the LVIA as unsuitable for development. In addition, Woodcote Parish Council note the rejection by South Oxfordshire District Council of a planning application for this site because of the negative impact on the landscape and that the new owners have withdrawn WNP2-33.</p>
33.	Page 31- Policy H2	<p>The recently adopted South Oxfordshire Local Plan sets out the expected tenancy mix for affordable units at Policy H9: Affordable housing.</p> <p>Due to this it may be that policy H2 is no longer required, as H9 of the Local Plan sets this out in greater detail.</p> <p>If you intend to retain the policy, then it should be amended reflect the adopted Local Plan and reference the full tenure mix, including 40% affordable rent and 35% social rent. The wording ‘Shared ownership’ should be changed to ‘Low cost home ownership’ (the shared ownership model still falls under this title).</p>	<p>Woodcote Parish Council strongly support the Local Plan 2013-35’s policies for low-cost housing.</p> <p>NCR - A neighbourhood plan is designed to meet local needs. As a small community this mix reflects the particular demographic and economic situation of Woodcote</p> <p>CR The Neighbourhood Plan has been changed to replace references to ‘shared ownership’ with ‘low-cost ownership’</p>

34.	Page 32- “The Plan supports the development of affordable housing in Woodcote for rent, shared ownership and forsale to local people.”	<p>Within the first sentence, ‘shared ownership’ should be changed to ‘low-cost home ownership’ to reflect the new South local plan.</p> <p>The word ‘local’ is highlighted multiple times. Development will be subject to meeting the needs of the district as a whole. The housing allocations policy has a 20% requirement of allocation to people with a strong local connection to the parish. It’s therefore recommended that this section is revised to reflect this and the Housing Allocations policy</p>	<p>CR The term ‘shared ownership’ has been replaced by ‘low-cost home ownership’.</p> <p>Housing is a particular problem in Woodcote and the update Neighbourhood Plan seeks to continue to help local people live in the village. In retaining this policy Woodcote Parish Council note that it was acceptable to SODC and the Examiner for the current made Neighbourhood Plan.</p>
35.	Page 32- Section 10.4	The first sentence here needs to reflect all tenures stated within the new South local plan. It’s suggested that the sentence reads “Affordable homes comprise of social rented, affordable rented and low-cost home ownership for eligible households whose needs are not met by the open market”	<p>CR The updated neighbourhood Plan has been amended to reflect the suggested wording.</p>
36.	Page 32 – Policy H4: Allocation of Affordable Housing	<p>Whilst you had a similar policy in WNP1, since your plan went through examination, we have had a number of plans try to achieve similar policies unsuccessfully. For example, a relatively recent example is Cholsey, the examiner recommended that the sentence, ‘<i>Priority on first letting of 20% of affordable homes in Cholsey will be given to people with astrong local connection to Cholsey</i>’, be deleted.His reasoning was that this related to the administration of a process and it relates to the role of SODC as the housing authority rather than its role as the planning authority. The report can be found here.</p> <p>The Council has a Housing Allocation Policy and this provides the mechanism by which affordable housing is allocated to applicants onthe housing register, available here on our website. We recommend that you consider the Housing Allocation Policy, which is the Council’s most up to date position on this matter.</p>	<p>NCR Woodcote Parish Council note that the Cholsey Neighbourhood Plan had a similar policy struck out but Cholsey is a significantly larger village with considerably better services than Woodcote so, given the importance of this policy to the community, Woodcote Parish Council wish the policy to be tested at examination.</p>
37.	Page 33 – 10.5 Exception Site Affordable Housing ‘The Local Plan 2035 provides for rural exception sites for affordable housing wherethe development meets an	This statement in the supporting text does not accurately represent what the Local Plan 2035 sets out regarding exception sites. Policy H10 sets out the policy considerations for exception sites and entry level housing schemes, this includes more than an identified local need and does not say that Parish Council support	<p>CR The updated Neighbourhood Plan has been amended to refer to policy H10.</p>

	identified local need and is supported or initiated by the Parish Council.'	is needed. We recommend that you refer directly to Policy H10 from the Local Plan 2035 instead.	
38.	Page 33- Policy H7	<p>The NPPG sets out how policies need to be supported by appropriate evidence. As this policy is very detailed in setting out the types of dwellings that should be provided, it needs to be supported by appropriate and robust evidence. It would be helpful to more directly address the evidence base that supports the proposed bed split in this policy and to expand on this in the supporting text.</p> <p>Having reviewed the Housing Needs Assessment produced, it is not clear that this document supports the proposed bed mix.</p> <p>The Woodcote housing survey shows 42% of respondents require a two-bedroom home, therefore the justification for the mix of 25% 2 bedroom and 50% 3 bedroom is not clear. It would be helpful to clarify other how other factors influenced your decisions.</p>	<p>NCR</p> <p>An objective of the updated Neighbourhood Plan is to attract young families to the village to maintain the vitality of the community. The housing needs assessment addresses this issue taking note of the need to attract young families to the village to address issues around the schools, health centre and the age balance in the village. The village currently has an excessive number of 4 & 5 bed houses, including smaller houses that have been extended so the focus is away from larger houses. Two and three bed houses are more attractive for young families.</p>
39.	Page 34 'Consideration will be given to the removal of permitted development rights when a Planning Application is considered in order to protect the stock of smaller and therefore relatively more affordable homes in Woodcote.'	This is outside the scope of a neighbourhood plan.	<p>CR</p> <p>Woodcote Parish Council note the comment but are concerned about the loss of the more affordable, smaller, open market housing by owners extending their homes.</p> <p>The wording has been amended to request the removal of permitted development rights when a planning application is being considered.</p>
40.	Page 34 10.8. Scale of new development Large scale development is not acceptable to the community and if new housing is needed in Woodcote, then the consensus is that it should be delivered through several smaller sites	Neighbourhood plans cannot place blanket restrictions on development. As explained earlier, the NPPF and the Local Plan contain policies guiding the consideration of applications for major development in the AONB.	<p>NCR</p> <p>This is an important issue that has been continually raised in consultations with residents who are concerned about large developments negatively affecting the character of the village and, as they can only be placed in greenfield sites in the AONB, the negative impact on the AONB.</p>

			<p>Woodcote Parish Council is also concerned about the likely failure to comply with Local Plan 2013-35 policy ENV1 and relevant NPPF requirements to enhance and conserve the AONB.</p> <p>Woodcote Parish Council also note that the current, made, Woodcote Neighbourhood Plan contained a similar policy (to 25 houses per site) which was accepted by the examiner.</p>
41.	Page 34- Policy H8	<p>This policy is overly restrictive and negative in its approach to development proposals. This is particularly problematic given that the neighbourhood plan is not meeting the housing requirement identified in the Local Plan. In this context, the proposed policy does not contribute to the achievement of sustainable development.</p> <p>The NPPF provides significant protection for Areas of Outstanding Natural Beauty, placing an arbitrary limit on the number of homes is overly restrictive and does not have regard to paragraph 172 of the NPPF which is clear in how planning proposals should be dealt with.</p> <p>The NPPF also explains that for the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p> <p>The proposed policy would have significant implications on a number of things, including, allocations in the neighbourhood plan, it could mean that a great number of sites are required to come forward in order to meet the housing requirement for the area, rather than a larger site where considerate design may be able to minimise the impact on the AONB setting. Our Landscape Officer also highlighted that a limit like this could restrict open space and play provision.</p>	<p>NCR</p> <p>As noted above Woodcote Parish Council believe that this policy is essential, when all such development can only be in greenfield sites in the AONB, to achieve the ‘conserve and enhance’ requirements of the NPPF and objective 7 and policy ENV1 of the Local Plan 2013-35.</p> <p>In consultations during both the first Neighbourhood Plan and the updated plan preparation, residents consistently expressed a preference for small sites, ideally limited to 10 houses. As such small sites may not be viable the limit was set at 25 houses in WNP1 and extended to 30 in WNP2. Failure to recognise the residents’ strong wishes could result in the Neighbourhood Plan failing at referendum.</p> <p>Paragraph 11 of the NPPF indicates that restrictions on development in AONBs is also a matter for plan making as well as decision taking. Therefore, consideration of whether a development might be assessed to be major development is a matter for consideration in allocating sites for a NP.</p>

		We therefore recommend that this policy is deleted.	
42.	<p>Page 34 – 10.9 Infill</p> <p>‘SODC’s Policy on housing in villages (H16) allows applications for infill development within the settlement boundary of Woodcote, as a larger village, to be considered.’</p>	<p>Please note that Policy H16 of the Local Plan relates to Smaller and Other Villages, not to Larger Villages.</p> <p>Policy H1: Delivering New Homes sets out when residential development on sites not allocated will be permitted, of particular relevance to larger villages it states:</p> <p><i>‘iii) it is development within the existing built up area of towns and larger villages as defined in the settlement hierarchy (shown in Appendix7); provided an important space of public, environmental, historical or ecological value is not lost, nor an important public view harmed’</i></p>	<p>Woodcote Parish Council note that policy H16 of SOLP35 refers specifically to Backland and Infill Development and Redevelopment. While clause 1 refers to small villages, clauses 2 and 3 are general and apply to all cases of backland or infill development. There is no exclusion of large villages.</p> <p>Woodcote Parish Council are familiar with Local Plan 2013-35 policy H1 and support the efficient use of land that infill can produce subject to the scale and impact being appropriate to a highly nucleated village in the AONB where much of the infill is rear gardens abutting greenfield land in the AONB.</p> <p>Woodcote Parish Council also note the acceptability of these policies to SODC in the current made Woodcote Neighbourhood Plan and the successful use of the previous policy (H10) by SODC to refuse planning applications for over development of curtilages.</p>
43.	<p>Page 35- Policy H9</p>	<p>We recommend the word ‘small’ is removed from the opening sentence of the policy. As a Larger Village, Woodcote is not limited to ‘small residential developments’.</p> <p>The criteria set out in this policy are overly restrictive. Woodcote is identified as a Larger Village and therefore, is an appropriate location for residential development to come forward in accordance with Policy H1 of the Local Plan.</p> <p>Policy H1 states:</p> <p><i>‘3. Residential development on sites not allocated in the Development Plan will only be permitted where:</i></p> <p><i>1) it is for affordable housing on a rural exception site or entry</i></p>	<p>CR</p> <p>Woodcote Parish Council understand that SODC have designated Woodcote as a ‘larger village’ and have amended the wording. However, the Parish Council believe that the village’s location entirely within the Chilterns AONB requires additional consideration to ensure compliance with Local Plan Policy 2013-35 ENV1 and the requirements of the NPPF that the landscape of the AONB be ‘enhanced and conserved’. Woodcote Parish Council believe that it may be possible to obtain more housing whilst complying with National and local planning requirements with small developments but that</p>

		<p><i>level housing scheme; or</i></p> <ol style="list-style-type: none"> 2) <i>it is for specialist housing for older people in locations with good access to public transport and local facilities; or</i> 3) <i>it is development within the existing built-up areas of Towns and Larger Villages as defined in the settlement hierarchy (shown in Appendix 7); provided an important open space of public, environmental, historical or ecological value is not lost, nor an important public view harmed; or</i> 4) <i>it is infilling, and brownfield sites within Smaller and Other Villages as defined in the settlement hierarchy; or</i> 5) <i>it is brought forward through a Community Right to Build Order; or</i> 6) <i>there are other specific exceptions/circumstances defined in a Neighbourhood Development Plan</i> 7) <i>and/or Neighbourhood Development Orders; or</i> 8) <i>it would bring redundant or disused buildings into residential use and would enhance its immediate surroundings; or</i> 9) <i>the design is outstanding or innovative and of exceptional quality and would significantly enhance its immediate setting.'</i> <p>Point b, sets out how proposals will not involve the outward extension of the settlement boundary, however as set out in Policy H1 of the Local Plan, there are situations whereby development on the edge or outside of any defined settlement boundary could be appropriate, e.g. exception sites, specialist housing for older people.</p>	<p>large developments are unlikely to meet those requirements.</p> <p>In respect of large development in the AONB, as all development in Woodcote can only be, the Parish Council note the submission of the Chiltern Conservation Board (Dr Lucy Murfett 14-Feb-19) in response to Question 91 which underlines the inappropriateness of applying a blanket growth figure of 15% on top of Core Strategy numbers to the larger villages when there is oversupply in the Local Plan 2013-35.</p> <p>SODC, as the Local Planning Authority, has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.</p> <p>The NPPF para 176 instructs that "<u>Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.</u>" and is clear that "<u>The scale and extent of development within these designated areas should be limited.</u>"</p> <p>Woodcote Parish Council note that no exceptional circumstances have been advanced to justify a substantial, arithmetically derived, 15% growth that treats settlements within the AONB as the same as those not located in a nationally designated area when alternative sites exist</p> <p>The NPPF is clear (paragraph 175) that SODC, as the Local Planning Authority, should allocate land with</p>
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			the least environmental or amenity value which will mean avoiding land in the AONB or its setting. The insertion of the word 'small' in the updated Neighbourhood Plan policy H9 recognises these requirements and contributes to compliance with Local Plan 2103-35 policy ENV1 and the requirements of paragraphs 175 and 176 of the NPPF.
		Point d states “does not reduce the privacy of adjacent properties”. This is too restrictive; the wording should be consistent with what is set out in Policy DES6 in the South Oxfordshire Local Plan. A proposed amendment is below 'does not have a significant adverse impact on the privacy of adjacent properties'	CR The wording of point d has been amended as suggested.
		Criteria g - There are other policies in the WNP2 which are concerned with the housing mix, we would therefore recommend that this criteria is deleted.	NCR Woodcote Parish Council included this criterion as clarification on the original policy (H10) in the current, made, Woodcote Neighbourhood Plan.
44.	Page 35- Policy H10	Point C states “does not result in loss of wildlife habitat in a residential garden”. This is too restrictive. It is very likely any development in a residential garden would result in the loss of some wildlife habitat. Policy E3 in the Neighbourhood Plan Review sets out that developments should deliver a 10% increase in Biodiversity, this should be sufficient to ensure there is no overall loss in biodiversity. Therefore, point C may not be required.	NCR Woodcote Parish Council appreciate this comment but, in support of National and Local planning policy aimed at increasing wildlife habitat, would like to see this policy element retained. Together with criterion g it provides additional clarity on infill and backland development. Woodcote Parish Council note that NPPF paragraph 71 includes the following: “Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

C-2.11 Comments on Section 11: Design Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
45.	Page 36- Policy D1	The development plan should be read as a whole, and policies should be positively prepared, therefore the second sentence is not required as these areas are covered by other policies.	<p>NCR</p> <p>Woodcote Parish Council include this policy to support the Local Plan 2013-34 aim of <i>'securing the highest quality of design in new development of all types and scales in South Oxfordshire'</i>⁵⁰ and the Local Plan's recognition of the particular sensitivity of design in the AONB⁵¹</p> <p>Woodcote Parish Council note the importance attached to good design in Section 12 of the NPPF, for example:</p> <ul style="list-style-type: none"> i. Paragraph 126 which states 'The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve; ii. Paragraph 127 which expects design policies to be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics; iii. Paragraph 127 which recognises that <i>'Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development'</i>; iv. Paragraph 130 which requires that <i>'Planning policies and decisions should ensure that developments are (sub-paragraph (c)) sympathetic to local character and history, including the surrounding built environment and</i>

⁵⁰ South Oxfordshire Local Plan 2013-35 paragraph 8.4

⁵¹ South Oxfordshire Local Plan 2013-35 paragraph 8.5

			<p><i>landscape setting'</i></p> <p>V. Paragraph 134 which says that '<i>Development that is not well designed should be refused especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'</i>.</p> <p>WNP2 policy D1 is a retained policy from the current, made, Woodcote Neighbourhood Plan and, therefore, having been accepted by the examiner it is entirely consistent with and supportive of both NPPF and Local Plan 2013-35 requirements.</p>
	Page 36 – Design and Access Statement	Add ' <i>Where appropriate</i> ' at the start of the first sentence. Depending on the scale and type of development, not all proposals will require the submission of a Design and Access Statement, therefore this text should reflect that.	<p>NCR</p> <p>Woodcote Parish Council regard this as essential given the particular sensitivities attached to development in Areas of Outstanding Natural Beauty.</p>
46.	Page 37 – Policy D2: Light Pollution	We recommend ' <i>Where planning permission is required</i> ', is inserted at the start of the policy. The provision of external lighting in some cases might not require planning permission.	<p>NCR</p> <p>Woodcote Parish Council note the importance attached by South Oxfordshire District Council and the Council's decision to take action to try and minimise light pollution in the district, 'in light of its priority to protect and restore the natural world'. Woodcote Parish Council further note the motion agreed by Councillors at a full meeting of South Oxfordshire District Council on Thursday 25th March that:</p> <p><i>This Council will:</i></p> <ol style="list-style-type: none"> 1. <i>Ensure that limiting light pollution and preserving dark skies are key priorities for planning policies and design guides, including master-planning of sites.</i> 2. <i>Work with Neighbourhood Planning groups to</i>

			<p><i>encourage the implementation of dark sky friendly lighting policies in Neighbourhood Plans.</i></p> <ol style="list-style-type: none"> 3. <i>Encourage the incorporation of dark sky friendly lighting schemes and avoid unnecessary lighting for all new development.</i> 4. <i>Write to MPs and government calling for the APPG’s ten recommendations on dark skies to be implemented through new legislation and reform of the planning system. These recommendations include reform of the NPPF to make extensive and specific reference to control of obtrusive light and to introduce strict regulation of exterior lighting, setting standards for brightness, colour and temperature of all lighting and empowering local authorities to stop nuisance lighting.</i> 5. <i>Work proactively with partners, Oxfordshire County Council as Highway Authority and others, to highlight the importance of dark skies, the need to limit the impact of lighting and to encourage policies to reflect best practice in lighting design.</i> 6. <i>Use our communications channels to increase understanding among residents and businesses of the importance of dark skies and limiting light pollution.</i> <p>Woodcote Parish Council strongly support the reduction of light pollution, especially in Areas of Outstanding Natural Beauty, and have retained this, examined, policy as a local contribution to achieving South Oxfordshire District Council’s objective.</p>
47.	Page 37 – Policy D3:Secured by Design (Retail Policy)	Whilst the encouragement of new development incorporating the principles of ‘Secured by Design’ is good, trying to take this a step furtherby encouraging proposals to achieve SBD accreditation is	NCR Woodcote Parish Council note that this policy was accepted at examination for inclusion in the current,

		<p>outside the scope of neighbourhood plans.</p> <p>Therefore, we recommend 'should' is replaced with '<i>will be encouraged</i>'.</p>	<p>made, Woodcote Neighbourhood Plan and are unaware of any changes in the NPPF or Local Plan 2013-35 requiring the suggested change. Woodcote Parish Council would welcome information on any changes that may make a change to this policy necessary.</p>
48.	Page 27 - Policy D4:Renewable Energy	<p>Requiring all new development to contain solar photovoltaic panels and/or solar water heating panels is unduly onerous. Depending on the scale and type of development, it may not be appropriate or viable to deliver these. Policy DES9 in the Local Plan sets out how the Council encourages schemes for renewable and low carbon energy generation. Therefore, in order to be in conformity and to complement policy DES9, we recommend 'should' is replaced with '<i>will be encouraged to</i>'.</p>	<p>NCR</p> <p>Woodcote Parish Council strongly support South Oxfordshire's recognition that the climate and ecological crises are the greatest challenges facing our society and their consequent:</p> <ul style="list-style-type: none"> • declaration in February 2019, of a climate emergency; and • goal of becoming a carbon neutral district by 2030 <p>Woodcote Parish Council note that the South Oxfordshire District Corporate Plan, adopted in October 2020, contains the six themes that represent the council's priorities for the next few years, these are:</p> <ol style="list-style-type: none"> 1. Protect and restore our Natural World 2. Openness and accountability 3. Action on the climate emergency 4. Improved economic and community well-being 5. Homes and infrastructure that meet local needs 6. Investment that rebuilds our financial viability <p>Homes are responsible for some 18% of CO₂ emissions⁵². This policy:</p> <ol style="list-style-type: none"> i. relates strongly to the District Council's priority theme 3 (Action on climate emergency); ii. supports the Local Plan 2013-35 which notes that 'The design and construction of new

⁵² Carbon Footprint: Exploring the UK's contribution to climate change WWF March 2020

			<p>developments and refurbishments to existing buildings can have a significant role in helping to reduce carbon emissions’;</p> <ul style="list-style-type: none"> iii. supports policy DES9 Renewable and Low Carbon energy; and iv. supports policy DES10 Carbon Reduction v. supports the views of residents who share the District Council’s concern about the impacts of climate change and support strong measures to address the threat.
49.	Page 38 – Policy D6: Sustainable Transport	<p>The NPPG sets out how policies in neighbourhood plans need to be supported by appropriate evidence. Whilst we support the inclusion of a policy on the topic of sustainable transport and specifically electric vehicles, this policy is setting numerical requirements and it is not clear what evidence is available to support this. The recently examined Wallingford Neighbourhood Plan originally included a policy setting out requirements on the provision of electric vehicle charging points. The examiner found that the policy was not supported by appropriate technical evidence and recommended a replacement policy which had a general and supporting nature. We recommend you consider using similar wording to replace the text concerning electric vehicles:</p> <p><i>‘New residential development should be designed to enable charging of plug-in and other ultra-low emission vehicles (including both cars and cycles) in safe, accessible and convenient locations.’</i></p> <p>Please note that Oxfordshire County Council have recently adopted the Oxfordshire EV Infrastructure Strategy. We recommend you seek input from them on this topic, as the evidence supporting their strategy may also help support your policy. More information is set out in Oxfordshire County Council’s Neighbourhood Planning Guide, available here, section 3.2.4 of this document specifically relates to Electric Vehicle Charging.</p>	<p>NCR</p> <p>Woodcote Parish Council note the decision of the examiner with respect to domestic charging points for electric vehicles in the Wallingford Neighbourhood Plan but are keen to support the district council’s goal of reducing CO₂ emissions by removing a domestic obstacle to private vehicle purchasers in the parish opting for an all-electric or a plug-in hybrid vehicle.</p> <p>The Parish Council believe the factors listed below show the difference between vehicle use in Wallingford and Woodcote and, together with the Parish Council’s support of the district council’s goal of reducing CO₂ emission, justify this policy.</p> <p>Woodcote:</p> <ul style="list-style-type: none"> i. is one of the poorest in terms of local facilities. The South Oxfordshire Settlement Assessment of 2017 ranks it 11th of 13. Since then, the settlement has lost a restaurant and its Post Office. ii. has no train station, no optician, and no dentist. iii. has an infrequent, unreliable bus service that make Wallingford, the nearest town all but inaccessible to older bus users, disabled bus

			<p>users and mothers with young children in push chairs.</p> <p>The combination of a lack of essential services and inadequate public transport make two cars a necessity for most families. This need is reflected in 60% of Woodcote households owning two, or more, cars, significantly higher than the rest of the district.</p> <p>The ability to charge two electric vehicles simultaneously is therefore important and the installation of charging points most cheaply installed when the dwelling is under construction.</p> <p>Woodcote Parish Council strongly support the Government's moves to remove the internal combustion engine from private transport. This policy aims to ensure that retrofitting of new developments to support electric vehicles as petrol and diesel engines are phased out is unnecessary.</p> <p>Woodcote Parish Council will review the supporting text to ensure the compelling case is clearly made.</p>
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C-2.12 Comments on Section 12: Development Site Policies

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
50.	Section 12: Development Site Policies	<p>Comments from our Ecology Officer:</p> <p>The existing Woodcote Neighbourhood Plan (WNP1) housing allocations threw up a number of problems which I am keen to ensure are avoided in the WNP2 allocations. Of specific concern is that none of the proposed allocations within WNP1 were subject to any, on the ground, ecological appraisal (survey). As a result, one site at Chiltern Rise Cottage (WNP1- 01) was allocated. This site turned out to contain priority habitat grassland which we would normally seek to protect from development, which caused a lot of problems when the planning application was considered.</p> <p>The WNP2 allocations for both housing and employment again have not been subject to any site surveys to establish the value of the existing habitats. The sustainability appraisal does involve a level of assessment however, this is based on a TVERC report for the parish which merely reflects what is currently known about habitats within the parish. The majority of the land in the parish has never been subject to any ecological surveys and as a result nothing is shown on the maps within this report for the proposed allocations in WNP2. To my knowledge none of the land which is allocated has ever been subject to ecological surveys and it is therefore possible that the allocations could once again contain important priority habitats which would be destroyed by the allocation.</p> <p>This would also make compliance with WNP2 policy E3 extremely difficult as it would not be possible to deliver 10% net gain on sites of high ecological value.</p> <p>It is therefore very important that the proposed allocations, particularly those at WNP2-02, WNP2-03, WNP2-25, WNP2-30 and WNP2-98 are subject to an initial habitat's surveys by a suitably qualified professional ecologist before the allocations are</p>	<p>Woodcote Parish Council are aware of the ecological value of the second Chiltern Rise site which is why it has been assessed as unsuitable for development.</p> <p>All allocated sites have been the subject of a Preliminary Ecological Appraisal (sometimes known as an Extended Phase 1 Habitat Survey) to identify any significant habitats or protected species on the sites.</p> <p>The assessment was conducted by Ecology by Design, a leading independent ecology consultancy based in Chalgrove with an experienced team of ecologists all of whom are members of the Chartered Institute of Ecology and Environmental Management and work to the Institute's Code of Professional Conduct, British Standard BS42020 and best practice guidelines.</p>

		<p>confirmed. If surveys were to identify important habitats on site, then these allocations may need to be re-considered in favour of less damaging options (which may also require ecological surveys).</p> <p>This is an important issue which needs to be addressed before this plan is adopted.</p>	
51.	Page 39 – Policy HS1:Site Allocations	<p>Table 12.i could be split into two separate tables showing the allocations from WNP1 and proposed allocations for WNP2.</p> <p>It is also not clear what is meant by ‘planning permission expected soon’. This wording seems to be presuming the outcome of current planning applications. It would be more appropriate to say that there is a live planning application.</p> <p>It would be useful to add some text to explain why some allocations from WNP1 are being carried over into WNP2. Only one site has not carried over into WNP2, this raises questions over the deliverability of the sites which were previously allocated. Sites need to be deliverable in order to be allocated. The examiner will likely explore this further therefore it would be helpful to add a brief explanation of why those allocations are still deliverable, despite not been delivered yet.</p>	<p>NCR</p> <p>CR</p> <p>Three sites had been labelled as ‘Planning permission expected soon’. These were:</p> <ul style="list-style-type: none"> ▪ WNP1-01 Chiltern Rise Cottage and surrounding land, Reading Road ▪ WNP1-02 Woodcote Garden Centre, Reading Road ▪ WNP1-16 Former Reservoir site, Greenmoor <p>WNP2 has been amended to record that:</p> <ol style="list-style-type: none"> i. planning permission has now been granted for sites WNP1-01 and WNP1-02 and construction commenced; and ii. a planning application has been submitted to South Oxfordshire District Council for site WNP1-16 <p>Woodcote Parish Council do not understand this comment as all of the allocated sites from WNP1 have been carried forward into WNP2.</p> <p>Woodcote Parish Council note that of the five sites allocated in the current Woodcote Neighbourhood Plan 2013-2027:</p> <ol style="list-style-type: none"> i. one site is developed and occupied;

			<p>ii. two sites are under construction;</p> <p>iii. one site has applied for planning permission; and one site, WNP1-19, the Smallholding was not expected to be delivered until at least 2023.</p> <p>In summary:</p> <ul style="list-style-type: none"> ▪ 62% of the allocated sites are either fully developed or under construction; ▪ 26% of the housing is the subject of a current planning application; and ▪ 12% has yet to be the subject of a planning application. <p>Woodcote Parish Council maintain that 88% delivered, in construction or awaiting planning permission provides a strong demonstration of the credibility of the site allocations.</p> <p>Of the two reserve sites included in WNP1, one has been withdrawn by the owner and the second has been assessed as unsuitable for development (see comments from the Ecology Officer about the Chiltern Rise site). Given the progress in developing the allocated sites, it was judged unnecessary to seek alternative reserve sites to replace the original WNP1 reserve sites.</p>
52.	Page 39 – 12.2. Delivery	The figures referred to in this paragraph should be updated as they date from November 2019. We can provide you with more up to date completion and commitment figures.	<p>CR</p> <p>Woodcote Parish Council has updated the delivery to reflect the response to comment 51, above, and the additional windfall housing development.</p>
53.	Page 40- Map 12.i	The map would benefit from a key. For example, what are the yellow areas? The map should also show the whole area, as currently it cut off the western side of the village.	<p>CR</p> <p>Map 12i has been replaced with a new map covering the whole village and with a key.</p>

54.	Page 41 – Policy HS2: Chiltern Rise Cottage and surrounding Land	The text 'Planning permission expected to be granted for this site ref P20/S2110/FUL' should be removed from the policy heading. Information regarding the planning history of the site should be set out in the supporting text, not the policy text.	CR The text has been amended to show that Planning Permission has now been granted for this site and that construction has started.
55.	Page 41 'The Parish Council would wish to see that proposals for housing make provision for local residents to be given the sole opportunity to purchase the open market housing for a period of three months'	Whilst the Parish Council can express a preference for this, please note that the neighbourhood plan cannot control this. The Parish Council would need to discuss this with the relevant developers and is not something which the neighbourhood plan can influence. You should be careful with statements in the plan which may raise unrealistic expectations.	NCR Woodcote Parish Council understand this as it was explored before inclusion in the current made Woodcote Neighbourhood Plan. Discussions were held with developers who, although understanding that it is not part of the policy, agreed to local promotion as an early part of their marketing of the open-market properties and, in the case of the development at the Old Bus Depot (WNP1-18) this they did. Woodcote Parish Council note that this was deemed acceptable by the examiner of the current, made, Woodcote Neighbourhood Plan.
56.	Page 42 – Policy HS3:Woodcote Garden Centre, Reading Road	The text 'Planning permission expected to be granted for this site ref P20/S2110/FUL' should be removed from the policy heading. Information regarding the planning history of the site should be set out in the supporting text, not the policy text.	CR The text has been amended to show that Planning Permission has now been granted for this site and that construction has started.
57.	Page 43 – Policy HS4:Former Reservoir Site,Greenmore	The text 'Planning permission expected to be granted for this site ref P20/S1984/FUL' should be removed from the policy heading. Information regarding the planning history of the site should be set out in the supporting text, not the policy text.	CR WNP2 has been amended to reflect the status of the planning application for this site when the updated plan is submitted for pre-examination consultation. See above
58.	Page 45 & 46 – Policy HS6: Behind Yew Tree Farmhouse 1 and Policy HS7: Behind Yew Tree Farmhouse 2	We have made comments on these proposed allocations earlier in our comments. Have these sites been considered for development together? They are located next to each other, and the proposed approach will lead to the creation of two separate sites, when it might be better to explore a joined-up approach combining the two sites. This could have the benefits of delivering affordable housing, optimising densities on the site, and delivering a better landscape	NCR These sites are in separate ownership, so we cannot force them to be developed as a single site. Each owner has been consulted to establish how much land they are prepared to release, and the allocations reflect this. We have encouraged them to consider a joint approach, but we cannot make landowners release

		scheme,which might minimise any harm caused to the AONB.	land that they wish to keep undeveloped.
59.	Page 47 – Policy HS8:Beechwood Court	It is not clear how the figure of 14 homes was arrived at. It is also not clear why the policy is limiting development on this site to 1 or 2 bed flats. More supporting text explaining this would be helpful.	CR These offices were built with a possible conversion to 14 flats in mind. The updated plan now includes additional explanation.
60.	Page 48 – Policy HS9:Land to the east of Church Farmhouse	Comments from our Landscape Officer: Item f states the existing hedge across the middle of the site is to be relocated to the rear, does this mean translocated i.e., the existing hedge is to be dug up and moved (is it a valuable species rich hedge/ Important hedge),or is it to be replaced by a new hedge?	Woodcote Parish Council are sympathetic to this concern especially given that this site is a greenfield which extends the developed area into the AONB. The owner has stated, however, that they wish to translocate the existing hedge. In so doing, this releases more land and thus allows more dwellings to be constructed on the site.
61.	Page 49- Site WNP2-33	Has the plan taken account of access? Would the Green Space block access to the site?	CR This site has been withdrawn by the new owners.
62.	Page 52- Policy ES3	Point e of the policy states that up to five industrial units will be located on the site, which is not positively worded and may be overly restrictive. We recommend replacing ‘up to’ with ‘approximately’. Point g of the policy states that additional parking should be provided to accommodate staff from the existing businesses. Developments can only be required to mitigate their own impact, therefore this should be removed from the policy, as it seeks to address an existing need.	CR There is an agreement with the landowner for 5 units. However, Woodcote Parish Council has amended the wording to read ‘approximately 5 units’. NCR This policy is included in WNP2 to improve local employment opportunities and add to the economic sustainability of the community. At the same time the policy addresses a long-standing road hazard at this bend of the road created by the parking on-street of the vehicles cars, vans and lorries, of those employed at or supplying the industrial units at Wards Farm. In including this policy Woodcote Parish Council note that the current dangerous situation arose from a failure of South Oxfordshire District Council to enforce a condition of the original planning applications for the businesses on the current

			Wards Farm site which required them to retain parking spaces adjacent to the businesses but are now used to store old vehicles, steel and other business-related material.
63.	Page 52 ‘The additional dedicated parking (the area shaded brown) is required to provide an alternative to the current on-street parking in the vicinity of the site which makes travel along this section of Greenmoor hazardous with the likelihood of meeting oncoming traffic on the wrong side of the road at the corner.’	Please note that development can only be expected to mitigate its own impact, it cannot be required to mitigate existing issues.	<p>NCR Woodcote Parish Council are puzzled by the suggestion that the construction of a carpark to reduce or remove a dangerous road hazard is not permitted in these circumstances and would welcome an explanation from South Oxfordshire District Council.</p> <p>Woodcote Parish Council have discussed this with the landowner, who is also the owner of businesses on the current Wards Farm site and confirmed that the units and carpark will be the subject of an agreement with him.</p> <p>Woodcote Parish Council note that, in the response from Oxfordshire County Council, the Highways Dept commented: <i>“We have no objection in principle to additional parking spaces being provided within the brown area at the site for use by employees and customers of existing businesses of Wards Farm. While dedicated car parking can often encourage people to drive to their destination rather than using alternative modes of transport, the removal of parked cars from along Greenmore would be beneficial in the interests of highway safety. A new pedestrian access from this car park to the existing businesses of Wards Farm would remove the need for people to walk along Greenmore.”</i></p>

C-2.13 Comments on Section 13: Our Village – Our Future

No Comments

C-2.14 Comments on Appendices A and D

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
64.	Page 66 – Appendix D	<p>D.3 AONB Constraints Within this section it states:</p> <p><i>‘A detailed Landscape and Visual Impact Assessment was carried out to determine which sites might be suitable for development. Five sites for housing (accommodating 57 houses) and two sites for employment use were identified as having minimal impact on the AONB with appropriate mitigation. All other sites were found to have a major impact on the AONB and were rejected.’</i></p> <p>As explained in our comments, the WNP2 should be supported by a landscape capacity assessment. A Landscape and Visual Impact Assessment gives no indication as to the capacity of the sites, therefore it is not known if more of less development could be accommodated on site. It should be noted that in relation to housing numbers the starting point should be the 115 homes set out in the Local Plan. The significant reduction to 57 homes is not justified. We provide further information in our detailed comments on the Landscape and Visual Impact Assessment.</p>	<p>Woodcote Parish Council does not understand this new requirement and notes that:</p> <ol style="list-style-type: none"> i. The Local Plan 2013-35 acknowledges that (paragraph 4.28) <i>‘Some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones. Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB, a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable’</i>. Nowhere in the Local Plan 2013-35 is there mention of a Landscape Capacity Assessment; ii. In a Zoom meeting with Planning Policy Officers on 14-Oct-20 representatives of the Woodcote Neighbourhood Plan team were specifically told by Ricardo Rios that a Landscape and Visual Impact Assessment was required. To confirm this an e-mail⁵³ was sent to Dr Lucy Murfett. In the absence of a reply, the Woodcote Team proceeded with the LVIA on the assumption that there had been no change to the Rios instruction. <p>Woodcote Parish Council would welcome an</p>

⁵³ See Figure 4.1 in Section 4.2.7 of this report

			<p>explanation of:</p> <ul style="list-style-type: none"> i. why, and when, the requirement for a Landscape Capacity Assessment was introduced; ii. why the Woodcote Team was wrongly informed; and iii. why, when expenditure was required to produce the LVIA, no correction, if needed, was rapidly provided.
		<p>D.4 Local Housing Need</p> <p>The section is incorrect in setting out the housing requirement for Woodcote. Firstly, the Local Plan sets a housing requirement figure of 115 homes for Woodcote. Policy H4 is clear in stating that this is to be delivered through Neighbourhood Development Plan site allocations.</p> <p>The Local Plan has been examined and found sound, therefore the statement that ‘to date the Local Planning Authority have not provided any evidence to support this allocation nor any evidence of: - a national need for this development; any negative impact of refusing it; nor that the development cannot be delivered outside the designed area’, is incorrect. As part of the examination of the Local Plan, housing in the larger villages was examined, the Local Plan is supported by an extensive evidence base, including a Landscape capacity Assessment for the Larger Villages in the district, available here.</p> <p>The Local Planning Authority, in line with paragraph 65 of the NPPF has provided Woodcote with its housing requirement figure. As we have highlighted elsewhere in our comments, paragraph 65 of NPPF is clear that housing requirement figures should not need re-testing at neighbourhood plan examinations unless there has been a significant change in circumstances. There has been no change in circumstances since the adoption of the Local Plan and no justification as to why a different approach is necessary. Currently the draft WNP2 fails to meet the requirement set out in</p>	<p>NCR</p> <p>Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates policies, H4 and ENV1 as strategic. This pair of policies contradict themselves with respect to development in a village constrained by an AONB. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p> <p>The Parish Council did not retest the housing requirement figure. The allocation proposed in WNP2 is the result of the required assessment of the economic, social and environmental sustainability of each site supported by landscape and visual impact and ecology assessments.</p>

		<p>Policy H4 of the Local Plan. No evidence supports WNP2 which would suggest that its capacity is constraints and therefore it cannot meet the requirement.</p> <p>Therefore, the risk of the Plan as drafted failing to meet the basic conditions is high, as it is not in conformity with strategic policies in the development plan.</p> <p>It is important to note that Policy H4 in the Local Plan has the contingency in part 2 of the policy which states:</p> <p><i>'If a Neighbourhood Development Plan has not adequately progressed with allocating sites* to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in that Larger Village will be supported provided that proposals comply with the remainder of the policies in this Development Plan.'</i></p>	<p>Woodcote is entirely within, and washed over by, the Chilterns AONB and, as echoed by Dr Lucy Murfett in her submission on behalf of the Chilterns Conservation Board</p> <p><i>'The Council has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. The NPPF para 172 instructs that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." It goes on with the new sentence, added in the 2018 update of the NPPF: "The scale and extent of development within these designated areas should be limited."</i></p> <p>Dr Murfett goes on to say <i>'The larger villages policy H4 does not mention the AONB. The 15% allocation could involve major development in the AONB, which is specifically prohibited by paragraph 172 of the NPPF unless in exceptional circumstances and where it is in the public interest. Accommodating a mathematically-derived village growth percentage is unlikely to meet that test; it is not exceptional, there are no national considerations, and alternative sites exist. It is unreasonable to defer to neighbourhood plans the responsibility for carrying out a major development assessment which should be done at the point of split between the larger villages, because neighbourhood plans are the wrong spatial scale to carry out the assessment of whether there are alternative sites not in the AONB (NPPF para 172 major development test second</i></p>
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		<p>Failing to meet the requirement set out in part 1 of the policy through WNP2 within the timeframe specified, will result in the contingency in part 2 of the policy coming into force</p>	<p><i>bullet). Settlements in or in the setting of the AONB should have special consideration. This national landscape designation will clearly constrain the ability to accommodate further development in the AONB and to a lesser extent in the setting of the AONB. The NPPF is clear that LPAs should allocate land with the least environmental or amenity value (para 171), which will mean avoiding land in the AONB or its setting.</i></p> <p><i>(Note paragraphs 171-172 have been replaced by 175-177 in the 2021 issue of the NPPF).</i></p> <p>Woodcote Parish Council have done everything possible to identify sites within the AONB but, as Dr Murfett says, the housing numbers cannot be met without significant intrusion into greenfield sites in the AONB. As such, and following extensive examination of all sites offered, Woodcote Parish Council believe that the District Council has not demonstrated a local need and has not shown that there are not sites elsewhere in the District in order to justify the damage to the AONB despite the District Council's stated objective (7.1) to 'protect and enhance the natural environment, including biodiversity, the landscape, green infrastructure and our waterways, placing particular importance on the value of the Oxford Green Belt, our two Areas of Outstanding Natural Beauty and the River Thames', and priority given to 'Protect and restore our Natural World' as Theme 1 in the Council's recently published Corporate Plan.</p> <p>Woodcote Parish Council were assured in the meeting with Dr Lucy Murfett and Ricardo Rios that the contingency in part 2 of the policy would not be</p>
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			invoked provided that proportionate evidence in the form of an LVIA supporting the allocations was presented ⁵⁴ .
		<p>D.5 Projected Windfall Provision Paragraph 4.5 of the Local Plan supporting text sets out:</p> <p><i>'We expect windfall development to take place in accordance with the Development Plan, which will focus speculative development to infill sites within settlements. Since 2011 we have delivered on average 145 dwellings per annum from windfall sites. We have taken a conservative approach to forecasting this forward and consider that 100 homes per year could be reasonably achieved. As this will be focused on infill sites within settlements, we expect most of these developments to be smaller housing sites.'</i></p> <p>Windfall has been taken into account in the supply at a district-wide level, as set out above in the Local Plan. Table 4c: Expected sources of housing supply, in the Local Plan, identifies a windfall allowance of 1,200 across the plan period. This figure covers the whole district, including Woodcote, as identified in the Local Plan. Therefore, any windfall allowance proposed in the neighbourhood plan, would result in double counting and would not have regard to paragraph 65 of the NPPF. The South Oxfordshire Local Plan 2035 establishes a housing requirement figure for the whole district, it sets out all the expected sources of housing supply - including windfall allowance (table 4c referred above) and sets out a housing requirement for designated neighbourhood areas, including Woodcote.</p>	<p>NCR</p> <p>Woodcote Parish Council notes the likelihood of windfall development in the parish but does not include this in its housing development numbers.</p>
65.	Appendix A: Glossary-Affordable Rented Housing	Affordable Rented Housing' – social rented does not need to be mentioned in this definition as it is a separate tenure. This definition could be revised to read "Rented housing let by registered providers of affordable housing to households who's needs are not met by the market"	CR WNP2 has been amended as suggested.
66.	Appendix A: Glossary-	Refer to Annex 2, part d of the NPPF regarding	CR

⁵⁴ See the meeting note in Figure 4.1 of this report.

	Intermediate Housing	affordable routes to home ownership.	Woodcote Parish Council note the definition in the NPPF and has amended the definition in WNP2 's Glossary.
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C-2.15 Comments on Housing Needs Analysis

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
67.	Overall Comment	<p>We have reviewed the Housing Needs Assessment and we have some concerns over the methodology and its reliability.</p> <p>As we have explained in our other comments relating to your housing requirement figure, Policy H4 in the South Oxfordshire Local Plan sets out the requirement of 115 homes at Woodcote. This figure has recently been examined as part of the Local Plan examination and was adopted by the Council following the successful examination.</p>	<p>NCR</p> <p>Woodcote Parish Council take the housing allocation in the Local Plan 2013-35 very seriously but, as explained previously, the Parish Council must also produce a Neighbourhood Plan that complies with the NPPF and the Local Plan 2013-35.</p> <p>Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates policies, H4 and ENV1 as strategic. This pair of policies contradict themselves with respect to development in a village constrained by an AONB. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p> <p>The Parish Council did not prepare a Housing Needs Assessment to challenge the allocation in the SOLP35 but to develop a greater understanding of the local need as a useful check on the allocation emerging from the evaluation of potential sites.</p>

Section 4 of this document contains further details.

Woodcote Parish Council have examined all possible sites in the parish and supported by a thorough Landscape and Visual Impact Assessment, have concluded that the arithmetically derived allocation, which does not differentiate between villages within the AONB and those without, cannot be delivered whilst complying with requirements of paragraphs 174-177 of the NPPF and policy ENV1 of the Local Plan 2013-35.

Woodcote Parish Council also note the concern expressed by Dr Lucy Murfett in her submission to South Oxfordshire in respect of the, then emerging, Local Plan. In this submission the Chilterns Conservation Board make the following points:

- *The Board does not support applying a proportional growth figure of 15% growth, on top of Core Strategy numbers, to the larger villages;*
- *the numbers could easily be lowered by reducing the over-supply provided for in the plan;*
- *the Council has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty;*
- *very little weight appears to have been given in the distribution decision to the requirements of paragraph 172 of the NPPF. A mathematically derived village growth percentage is unlikely to meet the tests in that paragraph: it is not exceptional, there are no*

			<p><i>national considerations, and alternative sites exist;</i></p> <ul style="list-style-type: none"> ▪ <i>settlements in or in the setting of the AONB should have special consideration. This national landscape designation will clearly constrain the ability to accommodate further development in the AONB and to a lesser extent in the setting of the AONB. The NPPF is clear that LPAs should allocate land with the least environmental or amenity value (para 171), which will mean avoiding land in the AONB or its setting;</i> ▪ <i>the Chilterns Conservation Board considers that the Council should focus development on sites outside, and which do not affect the setting or appreciation of, the AONBs</i> ▪ <i>the cumulative effects on the AONB need consideration, where multiple sites around a settlement are to be developed.</i> <p><i>(Note paragraphs 171-172 have been replaced by 175-177 in the 2021 issue of the NPPF).</i></p> <p>Woodcote Parish Council consider that the sanction in SOLP35 policy H4 of a presumption in favour for planning applications if Neighbourhood Plans have failed to meet these "requirements" established a local presumption in favour of development that is contrary to the NPPF para 11 footnote 7 which clearly establishes that a presumption in favour is not to be applied in AONBs.</p>
		<p>As highlighted earlier in our comments, as paragraph 65 of the NPPF sets out, once strategic policies have been adopted, housing requirement figures should not need re-testing at neighbourhood plan examinations, unless there has been a significant change in</p>	<p>Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates policies, H4 and ENV1 as</p>

		<p>circumstances that affect the requirement. As there have been no significant change in circumstances, the requirement in H4 still stands and it is important for you to clarify if the housing need identified in your assessment would be met within the 115 homes requirement identified in the Local Plan or whether this should be delivered in addition to the Local Plan requirement.</p>	<p>strategic. This pair of policies contradict themselves with respect to development in a village constrained by an AONB. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p>
		<p>Some of our concerns relating to the housing needs assessment include:</p> <p>Clarification as to source data, and availability of data for review The document does not set out the housing need for the area in terms of number or type, rather it appears to produce a population projection based on current trends and policy aims.</p> <p>A Housing Needs Assessment should not start with a target population figure, it should be an objective assessment of housing need in an area.</p> <p>There is not much information provided on affordable housing need and how this may contribute to Woodcote’s overall housing need. It is stated in the document that that the evidence for additional housing need across Oxfordshire was predicated in anticipated level of economic growth.</p> <p>This does not recognise the significant need for affordable housing that has driven housing need, particularly in South Oxfordshire.</p> <p>Locality provide a guide on producing a Housing Needs Assessment, available here, we would recommend this document</p>	<p>Woodcote Parish Council have made it clear that this assessment is not part of the evidence supporting the housing numbers proposed in WNP2. The number of new homes proposed is driven entirely by the availability of suitable land which means land that meets the requirements of the NPPF with respect to development in AONBs and SOLP35 policies H4 and ENV1.</p> <p>The allocations result from a detailed examination of all proposed sites which, as required by Policy 4.28 and advised in a Zoom meeting with Planning Officers at SODC on 14-Oct-20, included a Landscape and Visual Impact Assessment to identify the sites that could be developed without unacceptable damage to the AONB.</p> <p>Although only used to develop a greater understanding of the local need the Locality advice⁵⁵ on sources of data and methodology was followed together with:</p> <ul style="list-style-type: none"> ▪ a detailed housing survey carried out by the

⁵⁵ Housing Needs Assessment at Neighbourhood Plan Level

		is reviewed and housing needs assessment modified accordingly	<p>Oxfordshire Rural Communities Council (now Community First Oxfordshire);</p> <ul style="list-style-type: none"> ▪ local survey input; and ▪ a detailed model using ONS and Electoral roll statistics.
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C-2.16 Comments on The Sustainability Appraisal

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
68.	Overall Comment	<p>We have reviewed the Sustainability Appraisal (SA) as part of the Regulation 14 consultation. We have a number of concerns regarding the SA and do not consider that as currently drafted, the SA would meet the relevant requirements. We therefore advise you to obtain technical support from Locality, more information is set out on their website, link here. We know some neighbourhood planning groups in our district have been able to obtain a technical support package where the appointed consultants/specialists sense checked/helped develop pre-existing work. We think your Sustainability Appraisal would benefit from this.</p> <p>Our following comments provide some examples of areas in the SA that needs improving.</p>	<p>Woodcote Parish Council note that:</p> <ol style="list-style-type: none"> i. the approach mirrors exactly the guidance given by South Oxfordshire Planning officers during the production of the current, made, Neighbourhood Plan; ii. to be made the Sustainability Appraisal was examined and found adequate and proportionate for a small parish. <p>As the Sustainability Appraisal was judged acceptable by the Examiner, Woodcote Parish Council would appreciate, therefore, an explanation of how the requirements have changed since the making of the current Woodcote Neighbourhood Plan.</p>
69.	Page 3 - 1.2 The Woodcote Challenge	<p>No reference is made, or consideration given, to the South Oxfordshire Local Plan requirement of 115 as set out in Policy H4: Housing in the Larger Villages. Paragraph 13 of the NPPF states:</p> <p><i>'Neighbourhood plans should support the delivery of strategic policies contain in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.'</i></p> <p>Policy H4 in the Local Plan is a strategic policy and the Woodcote</p>	<p>NCR</p> <p>Woodcote Parish Council take the housing allocation in the Local Plan 2013-35 very seriously but, as explained previously, the Parish Council must also produce a Neighbourhood Plan that complies with the NPPF and SOLP35 policy ENV1.</p> <p>Section 4.2 of this document notes that Section 3</p>

		<p>Neighbourhood Plan Review should support this. Following on from this, paragraph 29 of the NPPF sets out:</p> <p><i>'Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.'</i></p>	<p>of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates policies, H4 and ENV1 as strategic. This pair of policies contradict themselves with respect to development in a village constrained by an AONB. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p>
		<p>This section of the SA states that the identified need is for 'some 60 additional new homes', this is significantly less than that set out in the South Oxfordshire Local Plan and directly conflicts with the NPPF paragraphs set out above. As set out, this approach in the SA does not appear to grapple with the relevant strategic policy context.</p> <p>We note in the past we have had discussions about the Woodcote Neighbourhood Plan Review providing an interim report whilst the Local Plan 2035 was emerging and due to its slight delay in being adopted with the Holding Direction. However, the strategic framework for the Woodcote Neighbourhood Plan Review has now been set with the adoption of the Local Plan in December 2020.</p> <p>All the facts need to be present in the narrative of the SA. As set out in the RTPI practice advice on Strategic Environment Assessment (available here), the SA tells the story of the plan making process and documents how planning decisions have been made, and how they have been informed by environmental and sustainability concerns. The adopted development plan is the starting point, specifically the housing requirement identified in Policy H4 of the Local Plan.</p>	<p>NCR</p> <p>Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates policies, H4 and ENV1 as strategic. This pair of policies contradict themselves with respect to development in a village constrained by an AONB. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p>

70.	Page 3 – 1.3 Scoping Report	It does not appear that the Scoping Report is available to view. Reference is made to the document throughout the SA and sections within the document, therefore it should be available for the public to view.	The Scoping Report has been reviewed by the Statutory Consultees and approved, with minor modifications that were implemented by the Parish Council. Publication was intended to be with Sustainability Appraisal, as part of the evidence showing that the proposed updated Neighbourhood Plan meets the Basic Conditions. However, the Scoping Report has now been published.
71.	Page 3 – 1.4 Sustainability Appraisal Approach	<p>Within this section it states:</p> <p>‘Allocations and policies retained from WNP1 were appraised for WNP1 and the appraisal of these is not repeated in this Appraisal.’</p> <p>WNP2 will replace WNP1 if adopted, therefore the Plan and supporting documents, including the Sustainability Appraisal need to stand on their own and not rely on previous WNP1 documents, which will be superseded. We recommend information from the WNP1 Sustainability Appraisal is carried over into this Sustainability Appraisal where relevant.</p>	The Sustainability Appraisal will include the relevant appraisals supporting the current, made, Neighbourhood Plan.
72.	Page 5 – Section 2: Strategic Option Sustainability Appraisal	<p>ii.</p> <p>This point is based on paragraph 172 of the NPPF. However, in places, the interpretation of the NPPF is not accurate. The first point, ‘avoiding major development in AONBs’, is not what paragraph 172 sets out. The key text relating to plan making from paragraph 172 is that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs and that the scale and extent of development within these designated areas should be limited. The final sentence makes an assumption, stating: ‘In the absence of exceptional circumstances options requiring the loss of less than 1HA of greenfield land in the AONB will be preferred’.</p> <p>Something which we have also picked up on in other elements of this SA, is the emphasis on the definition of major development and the setting of 1-1.5 hectare thresholds. The neighbourhood plan needs to take a balanced view, supporting the strategic</p>	<p>Woodcote Parish Council agree that paragraph 172 sets out to ensure the conservation and enhancement of landscape and scenic beauty in AONBs and not to avoid development in such designated areas and further note that when plan making this means that the scale and extent of development should be limited.</p> <p>In addition to requiring that ‘the scale and extent of development within AONBs should be limited, NPPF paragraph 177 states that planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. NPPF paragraph 11 also states that restrictions such as paragraph 177 also apply to plan making as well as decision taking.</p>

		<p>priorities set out in the Local Plan and not promoting less development than set out in the local plan, while giving great weight to conserving the landscape and scenic beauty of the AONB in line with paragraph 172 of the NPPF.</p> <p>The rationale for the 1HA threshold is not clear and does not take a balanced approach as highlighted above. Point ii, should be focused on giving great weight to conserving and enhancing landscape and scenic beauty and limiting the scale and extent of development, not setting thresholds which could have significant implications on the outcomes of the assessment.</p>	<p>In the absence of an accepted definition of ‘major development’, and noting the need to consider the context, Woodcote Parish Council have examined case law and planning appeals regarding major development in AONBs to ensure that whilst striving to meet the arithmetic allocation in the South Oxfordshire Local Plan 2013-35 the proposed update to the Woodcote Neighbourhood Plan complied with both the letter and intent of NPPF paragraph 177.</p> <p>The conclusion of the Parish Council, published in a document ‘entitled ‘What is major development in an AONB?’⁵⁶, is that, typically, a development representing 4-5% increase in the number of houses would normally be considered to be major development. As the report points out there are other factors that should be considered, nevertheless, 4-5% growth represents a reasonable guide.</p> <p>4-5% for Woodcote represents about 45 houses. At a density of 30 dwellings/hectare that would be a 1.5HA site, hence the use of this figure in assessing the impact of development.</p> <p>This view is supported by the refusal of a planning application for 45 houses on a site in Woodcote on the basis that it was a major development in an AONB.</p>
73.	Page 5 – 2.1 Requirement	Our comments above relating to section 1.2 apply here also. As set out in the comment above no consideration has been given to the requirement as set out in the South Oxfordshire Local Plan. The Local Plan sets out the requirement for the Neighbourhood Plan in	NCR Woodcote Parish Council note the repeated references to policy H4 being a strategic policy and

⁵⁶ What is major development in an AONB, Woodcote Parish Council 2019

		<p>policy H4 and this is the starting point for the Woodcote Neighbourhood Plan Review. Policy H4 in the Local Plan is a strategic policy, and the Woodcote Neighbourhood Plan Review should support this in line with the NPPF.</p>	<p>that, as such, Neighbourhood Plans must therefore fully comply with this policy.</p> <p>Section 4.2 of this document notes that Section 3 of the Local Plan 2035 explicitly identifies policies STRAT1 to - STRAT14 as strategic and then, in Appendix 14, designates policies, H4 and ENV1 as strategic. This pair of policies contradict themselves with respect to development in a village constrained by an AONB. The examiner acknowledged the conflict, accepted the SOLP35 recognition that the AONB may restrict development (SOLP35 paragraph 4.28) and accepted that, as required by SOLP35 paragraph 4.28, allocations in AONBs must be supported by a Landscape and Visual Impact Assessment. The allocations in WNP2 are supported by an LVIA.</p>
		<p>In this section, it states that density has been capped at a maximum of 25 dwellings per hectare. Setting maximum densities conflicts with Policy STRAT5 in the Local Plan which sets out permission will only be granted where it can be demonstrated that the proposal optimises the use of land and potential of the site.</p> <p>Whilst the AONB is a factor to consider when looking at densities and could potentially result in a lower density, as set out in part 2 of Policy STRAT5 in the Local Plan, this does not apply a cap of 25 dwellings per hectare.</p>	<p>STRAT5 does not set a density requirement for the larger villages. It does, however, recognise the need to:</p> <ul style="list-style-type: none"> v. sustain an appropriate mix of uses (including green space and other public space); vi. respect local character; vii. protect and enhance the AONB; and viii. minimise the detrimental impacts on amenity of future and/or adjoining neighbours; <p>Woodcote Parish Council take seriously the requirement to maintain the local character and use land efficiently whilst protecting and enhancing the AONB and believe that a target density at 30 dph to allow for adequate provision of green spaces appropriate to a location in the AONB. This revision will be made to the draft Sustainability Appraisal.</p> <p>In so doing Woodcote Parish Council takes note of</p>

			<p>the Chiltern Conservation Board's (Dr Lucy Murfett 14-Feb-2019) response to Q 56 of the consultation on the Local Plan which states that residential densities are too high for AONB villages and that, rather than putting the onus on the developer to show why densities of 45 dph cannot be achieved in larger villages developers should, in AONB villages have to justify densities above 25 dph.</p>
74.	<p>Page 8 – SOT-02</p> <p>Would the option result in a single development greater than 1 HA?</p>	<p>In this section of table 2.3, it states:</p> <p><i>'Sites greater than 1-1.5 HA would constitute major development in this part of the AONB.'</i></p> <p>Our comments relating to section 5 also apply here. Whether or not a proposal is major development is a matter for the decision maker, this sustainability type SOT-02 does not allow for this consideration and is setting a threshold which has impacted the way in which the strategic options have been considered. Footnote 55 from paragraph 172 of the NPPF explicitly states:</p> <p><i>'For the purpose of paragraphs 172 and 173, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purpose for which the area has been designated or defined.'</i></p>	<p>Woodcote Parish Council understand that the final decision on what constitutes a major development rests with the decision maker.</p> <p>The Parish Council also note that NPPF paragraph 11 makes it very clear that <i>"the application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the scale of development in the plan area"</i> applies equally to plan making as well as decision making. The footnote to this paragraph identifies AONBs as one of the protected areas.</p> <p>As such, and as noted above, the Parish Council examined case law and planning appeals regarding major development in AONBs to provide an evidence-based estimate and concluded that, as published in the document 'entitled 'What is major development in an AONB?', typically, a development representing 4-5% increase in the number of houses would normally be considered to be major development. As the report points out there are other factors that should be considered, nevertheless, 4-5% growth represents a reasonable guide.</p>

			<p>4-5% for Woodcote represents about 45 houses. At a density of 30 dwellings/hectare that would be a 1.5HA site, hence the use of this figure in assessing the impact of development.</p> <p>This view is supported by the refusal of a planning application for 45 houses on a site in Woodcote on the basis that it was a major development in an AONB.</p>
75.	<p>Page 9 – SOT-04</p> <p>Ecological Impact</p>	<p>li this section of table 2.3, it states:</p> <p><i>'Woodcote is recognised as one of the most important locations for wildlife in the county with the habitat significance of 60% classed as Very High and 25-30% as High.'</i></p> <p>Please provide a source for this information.</p> <p>The assessment of the options undertaken relating to SOT-04 appear to be based on the above. This approach is general and it is unclear what evidence supports this.</p>	<p>The source of this information is Oxfordshire County Council's Wildlife and Landscape Study for South Oxfordshire.</p> <p>Details can be found in the Woodcote Neighbourhood Plan Scoping Report which includes the data found on http://owls.oxfordshire.gov.uk</p>
76.	<p>Page 10 – SOT-05</p> <p>Local Character Impact</p>	<p>The question asked in this section of the table is:</p> <p><i>'Would the option create a new development greater than 5% of current village?'</i></p> <p>The South Oxfordshire Local Plan proposes that the growth in larger villages is 15%. This has been tested through the Local Plan examination and forms the basis for the requirement set out in Policy H4.</p> <p>It is not clear what this element of the assessment is seeking to achieve. What evidence is the 5% based on? The application of 5% appears to be arbitrary and has impacted the assessment of the options, without making clear why this would be appropriate.</p>	<p>Woodcote Parish Council understand that the South Oxfordshire Local Plan 2013-35 allocated 15% growth (subject to the caveat of AONB villages being constrained by the AONB) and have explained in section 4.2 how the number allocated results from the Landscape and Visual Impact Assessment required by SOLP35 paragraph 4.28.</p> <p>This is a misunderstanding on the part of South Oxfordshire District Council. This figure applies to individual developments not the overall growth.</p> <p>This also supports the strongly expressed desire of the residents for smaller developments.</p>

77.	Page 13 – 3.1 Potential Site Identification	<p>In the ‘cleaning’ process, you refer to ‘too small to be anything other than infill opportunities’ – Could you please expand on this in the text. Was is the size threshold?</p> <p>The final criteria ‘withdrawn following a change in ownership’ – change in ownership does not automatically mean a site is unavailable.</p>	<p>Sites capable of supporting less than 3 new dwellings were not included as these would be available as infill sites and the Parish Council was keen to avoid artificially inflating the number of new dwellings.</p> <p>Woodcote Parish Council contacted every owner to ensure that the land identified by South Oxfordshire District Council’s consultants was available for development. In some cases, the owner confirmed that it was not and thus the site was removed from the list. To include it, even if adjudged suitable, would be to undermine deliverability.</p>
78.	Page 16 – Table 3.3	<p>Major development PST-01 - The assessment needs to be concerned with the potential harm caused by development on a site and whether this harm can be mitigated to an acceptable level. As Woodcote is washed over by the AONB, all development is going to be within it. Simply because a site is over 1.5HA does not mean that a site will result in harm that cannot be mitigated, similarly, just because a site is smaller than 1.5HA does not mean that it won’t harm the AONB.</p>	<p>This repeats the point made in comment 74 and as noted there, Woodcote Parish Council understand that the final decision on what constitutes a major development rests with the decision maker.</p> <p>The Parish Council also note that NPPF paragraph 11 makes it very clear that <i>“the application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the scale of development in the plan area”</i> applies equally to plan making as well as decision making. The footnote to this paragraph identifies AONBs as one of the protected areas.</p> <p>As such, and as noted above, the Parish Council examined case law and planning appeals regarding major development in AONBs to provide an evidence-based estimate and concluded that, as published in the document ‘entitled ‘What is major development in an AONB?’, typically, a development representing 4-5% increase in the number of houses would normally be considered to be major development. As the report points out there are</p>

		<p>PST-02 appears to be assessing cumulative impact. Our comments above relating to PST- 01 above apply here also. Whilst cumulative impact is an important consideration, the question asked is, ‘does the site abut another potential or allocated site?’. With the assessment looking at the physical size of the site and combining it with any neighbouring sites and commenting that they could potentially represent an incursion into the AONB. The focus on the assessment should be on the potential harm caused by development of a site/s.</p> <p>Landscape and Visual Impact Is this part of the assessment supported by any expert advice beyond the LVIA? Please see our comments relating to the LVIA.</p> <p>Road Safety and Congestion Have you sought input or advice from Oxfordshire County Council as the highways authority on these matters?</p>	<p>other factors that should be considered, nevertheless, 4-5% growth represents a reasonable guide.</p> <p>4-5% for Woodcote represents about 45 houses. At a density of 30 dwellings/hectare that would be a 1.5HA site, hence the use of this figure in assessing the impact of development</p> <p>Woodcote Parish Council agree. This test, one of many in the assessment, represents only part of the overall assessment and acts as a guide to whether further assessment of the impact on the landscape needs to be taken into consideration.</p> <p>Yes – please see the Landscape and Visual Impact Assessment response to comment 80.</p> <p>No, although Woodcote Parish Council continue to have extensive discussions with OCC Highways about traffic issues in the village and safety at ‘hotspots’ such as the War memorial Junction where a zebra crossing was recently installed.</p>
79.	Page 64 – 5.1 Context	In the second paragraph you quote the Local Planning Authority, could you please add the source of this quote?	The quotation is taken directly from the South Oxfordshire Landscape Assessment (SOLA) produced by Atlantic Consultants. Although produced some 20

		<p>The Requirement Our comments above relating to the requirement set out in the South Oxfordshire Local Plan 2035 apply here also.</p>	<p>years ago and recognising that the District Council has since updated the Assessment, the SOLA, and hence the South Oxfordshire District Council, recognised the location of Woodcote as being on the edge of <i>“the most visually significant and distinctive landform unit within the whole District. It comprises the steep face and top of the Chilterns escarpment, which forms a dramatic backdrop to the low-lying landscape of the vale to the northwest”</i>.</p> <p>Given that the escarpment is still there the Parish Council took the view that it was not unreasonable to conclude that the view of the District Council had not changed.</p> <p>Please see the Parish Council’s response to comment 69 above.</p>
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C-2.17 Comments on Section 3: Landscape and Visual Impact Assessment

Ref.	Section/Policy	SODC Comment/Recommendation	Plan Response
80.	General	<p>We have had detailed comment from a Landscape Officer on the Landscape and Visual Impact Assessment (LVIA) prepared to support the neighbourhood plan. These comments are set out below.</p> <p>The Landscape Officer has raised a number of concerns with the LVIA. In order for WNP2 to rely on landscape evidence, the evidence needs to be robust and be able to withstand scrutiny at the examination. As currently drafted, based on the feedback from the Landscape Officer, we do not consider that this document can</p>	<p>Woodcote Parish Council commissioned LandArb Solutions, to review the draft LVIA reviewed by South Oxfordshire District Council. The review was carried out by one of their staff who is a chartered member of the Landscape Institute.</p> <p>LandArb recommended a number of changes to the methodology to bring it more in line with GLVIA3 and make the assessment more robust.</p>

		<p>be relied upon to support the Plan. This then raises concerns about the integrity of the proposed allocations and site selection process.</p> <p>Based on the extent and nature of our concerns, we recommend that you obtain specialist/expert advice from a suitably qualified landscape consultant to address the issues.</p> <p>Grant funding is available from Locality, link here. This grant funding can be used to commission a landscape consultant.</p>	<p>All the recommendations have been implemented in the production of version 2 of the LVIA document.</p> <p>LandArb conducted a comparative assessment on six of the sites assessed and reached the same conclusions about the suitability of those sites for development.</p> <p>They included the following conclusion to their report (which is attached as an appendix to version 2 of the LVIA):</p> <p><u><i>“Summary and Conclusions</i></u></p> <p><i>Overall, it is considered that the draft document is a reasonably robust document. There are a number of recommendations arising from this review and some are regarded as essential to rectify errors or to strengthen compliance with the report in respect of GLIVA 3 compliance.</i></p> <p><i>The LVIA process is not completely objective and there is an element of subjectivity and judgement. It is possible for two different assessors to reach different conclusions. However, having undertaken a checking appraisal of 6 of the sites assessed as part of the report, there are no substantive matters of disagreement and the findings of the LVIA as reviewed are supported.”</i></p>
81.	General	<p>Comments from the council’s Landscape Officer:</p> <p>Documents reviewed: Landscape and Visual Impact Assessment, Consultation Version March 2021; Neighbourhood Plan 2013-2035, Consultation Version April 2021.</p> <p>Landscape and Visual Impact Assessment</p>	<p>Woodcote Parish Council note the view of the</p>

		<p>General Comments</p> <p>A landscape and visual impact assessment (LVIA) is generally used for a site that is the subject of a planning application, for which the details of the development are known. A comparison of a number of sites around a settlement is more appropriately assessed through a landscape sensitivity assessment (see An Approach to Landscape Sensitivity Assessment, Natural England, 2019, which replaces Topic Paper 6, Techniques and Criteria for Judging Capacity and Sensitivity). This allows a more strategic assessment of landscape sensitivity with regard to the principle of a particular type of change, where information concerning the potential development may be limited.</p>	<p>Landscape Officer that a Landscape Sensitivity Assessment would be more appropriate when the details of a development are not known.</p> <p>This contradicts both:</p> <ol style="list-style-type: none"> i. the requirement (paragraph 4.28) of the South Oxfordshire Local Plan 2013-35) which specifically states that a Landscape and Visual Impact Assessment is the required evidence; and ii. the instruction from SODC staff (Ricardo Rios and Dr Lucy Murfett at the meeting on 14th October 2020 to produce an LVIA in support of our concerns about damage to the AONB.
		<p>Landscape sensitivity assessments should be clear and concise with conclusions which are easily understood. The application of the LVIA method has led to a rather complicated study, in order to be able to compare sites individual findings have been rolled into one magnitude of landscape effect and one visual effect, with no clear mechanism for doing this, as noted in the detailed comments below.</p>	<p>The impact of ill-judged decisions can either:</p> <ul style="list-style-type: none"> ▪ lead to suitable sites not being allocated for new homes; or ▪ unsuitable sites being allocated for development with the consequent damage to the landscape of the AONB, contrary to both national and local policy. <p>A thorough assessment is, therefore, essential and, to be anything other than trivial, complex when the many factors are considered to provide an objective an assessment as possible in an area recognised by landscape professionals as inevitably, in parts, subjective.</p> <p>The LVIA contains a description of the methodology setting out how the different aspects are combined.</p>
		<p>Landscape sensitivity studies are likely to be carried out by landscape professionals, however it is stated that some aspects may be undertaken by non-professional community groups, for example to inform neighbourhood plans. LVIA's are carried out by landscape professionals, the Guidelines for Landscape and Visual</p>	<p>As noted above the LVIA has been reviewed, tested and subjected to the professional scrutiny and, with amendments, approval of a chartered landscape professional.</p>

		Impact Assessment, third edition (GLVIA 3) states at 2.24 <i>'Professional judgements must be based on both training and experience and in general suitably qualified and experienced landscape professionals should carry out Landscape and Visual Impact Assessments.'</i>	
		Detailed comments on the LVIA are set out below in relation to individual chapters. However, I suggest that the information is reformatted into a Landscape Sensitivity Study and that cumulative impact is also considered. The local plan evidence base should be used as a starting point for site assessment, and where assessments differ from this the reasons should be clearly covered. It is important that all the proposed sites are plotted together on one plan to explore the interrelationship between them i.e. would a user of a footpath walk past 4 different sites. I would also recommend considering whether a smaller number of slightly larger sites would have less impact than multiple small sites. Smaller sites have less scope to provide public open space and play facilities, potentially providing less benefits; consideration would need to be given as to how play could be provided to serve multiple small sites	<p>This suggestion is another contradiction to the requirement in paragraph 4.28 of the South Oxfordshire Local Plan 2013-35. This Local Plan specifically requires a Landscape and Visual Impact Assessment, something confirmed by Ricardo Rios and Dr Lucy Murfett, in a Zoom meeting with them on the 14-Oct-20 when they stated that a Landscape and Visual Impact Assessment would be required. However:</p> <ul style="list-style-type: none"> ▪ the comments on the emerging update to the Woodcote Neighbourhood Plan from Ricardo Rios and Robyn Tobutt of South Oxfordshire District Council dismiss the LVIA and require a Landscape Capacity Assessment; ▪ the South Oxfordshire District Council Landscape Officer in their response to WNP2 suggest that and LVIA is not appropriate and a Landscape Sensitivity Study should be produced. <p>Woodcote Parish Council would welcome clarification on exactly what is required and what additional information reformatting the LVIA into a Landscape Sensitivity Assessment would produce.</p>
		<p>Detailed comments</p> <p><u>2 Context</u> Clarify the origin of figures 2.3 to 2.5 (also at page 10 of the Neighbourhood Plan). The landscape types shown in Figure 2.5 are not from the previously referenced 2017 South Oxfordshire</p>	Woodcote Parish Council employed a chartered landscape consultant (LandArb) to review the LVIA who recommended a number of changes similar to those suggested by the Landscape Officer. All the consultant's recommendations have been implemented and incorporated into a revised

		<p>Landscape Assessment.</p> <p><u>5. Methodology</u> GLVIA 3 provides the industry standard guidance on landscape and visual impact assessment for the UK, but is not the legal basis for LVIA as stated in 5.1, 2nd paragraph, this is provided by the environmental impact assessment regulations (for England refer to the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017).</p> <p>Final paragraph, p19 – this states that all development in the AONB will have a major adverse impact on landscape character. This is not necessarily true, there can be instances where new development screens or replaces other intrusive uses, resulting in a benefit to the wider character area, and provides long term benefits as a result of new planting.</p> <p>5.2 – establishing the baseline should also include establishing the value of the landscape (GLVIA 3, 5.19)</p> <p>5.2.2 – GLVIA 3 states that sensitivity is derived by combining judgements on susceptibility to change and the value attached to the landscape identified in the baseline study. Landscape condition is considered along with other factors in determining the value of a landscape (GLVIA 3 Box 5.1). The sensitivity of a landscape receptor is then assessed by combining judgements on susceptibility to the type of change proposed and value (GLVIA 3, 5.39)</p> <p>5.2.2 – The landscape condition table seems to be more a measure of landscape value (see GLVIA 3 Box 5.1) landscape condition should be the measure of the physical state of the landscape, not including scenic quality, sense of place etc; there is overlap with the landscape value table.</p> <p>5.2.6 – It is more straight forward to derive sensitivity from a</p>	<p>version document.</p> <p>In addition, the landscape consultant carried out a comparative assessment of six of the sites and reached the same conclusions about their suitability and, therefore, endorsed the assessment carried out by Woodcote Parish Council. As such, the Parish Council believe that this LVIA provides adequate and proportionate evidence in support of the Parish Council’s aim to provide more housing in an AONB whilst conserving and enhancing the designated landscape.</p>
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	<p>simple table combining values obtained for susceptibility to change and value (eg high, medium, low). For example a low susceptibility to change and a low value may result in a low sensitivity, a high susceptibility to change and a low value may result in a medium sensitivity etc. (Similar to the table at 5.2.8 to calculate overall landscape effect.) This would simplify the process when considering sites in section 6; there is no simple mechanism given for calculating sites sensitivity from the factors listed i.e. condition, value and susceptibility.</p> <p>5.2.8 – The table for calculating the overall landscape effect would normally be termed significance of effect and would be applied to each landscape receptor, combining the magnitude of change with sensitivity. The text states that the overall effect identifies the effect on the landscape resource as a whole, based on the assessment of effect on individual landscape elements and landscape character, combined with sensitivity. However the table only shows how a single magnitude of effect is combined with sensitivity. There is no indication of how the individual effects on landscape elements and character are combined to produce one overall magnitude of effect, it is simply stated that this requires considerable judgement.</p> <p>5.2.10 - This deals with susceptibility of receptors to change rather than sensitivity (GLVIA 3 6.32 and 6.33). Sensitivity should be derived from a combination of susceptibility to change and the value of the view.</p> <p>5.2.12 – The combination of sensitivity and magnitude is usually used to determine the significance of effects on individual receptors. Here an additional table is used to identify the magnitude of an overall visual effect, using a new set of criteria which refer to 'the existing view', although it appears that the table is used to represent all views in one overall visual effect. This is confusing as it overlaps with a previous table which also defines the magnitude of change in views. It does not use results obtained</p>	
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		for individual visual receptors to come to one overall visual effect.	
		Overall the methodology is somewhat over complicated, with overlap between criteria in different tables, and doesn't always lead to a clear outcome. In particular it does not provide a method for calculating the overall landscape effect given for each site and uses a method of calculating an overall visual effect which can't be related back to results for individual visual receptors. This is of concern as these overall effects are taken forward to decide whether a site is suitable for development.	Woodcote Parish Council note that the methodology employed mirrors exactly that used to assess the landscape impact of development of sites for the Goring neighbourhood plan and that the methodology was considered acceptable at examination.
		<p><u>6 Site Appraisal</u></p> <p>I have not assessed all of the individual site appraisals but have set out comments below with respect to the first site, which are generally applicable to the other site assessments, I have also noted a couple of points in relation to other sites which caught my attention.</p> <p>6.3 WNP2-1 Hilltop Field:</p> <p>Built form: this would normally be covered in terms of the effect on settlement pattern; the effect on landscape pattern is also often considered.</p> <p>Vegetation: the assessment of vegetation impact assumes only an adverse effect due to loss of hedge to provide access, but most development proposals would include additional planting as mitigation or would at the very least replace any vegetation lost, therefore in most cases this would be a beneficial effect.</p> <p>Public access: this is given a high adverse effect and medium sensitivity but a neutral overall landscape effect. It may be better not to include the footpath as a landscape element but to cover it in terms of the effect on views, i.e. the change from rural to urban context; it is unlikely that there would be loss of access to the footpath.</p>	<p>As noted above, Woodcote Parish Council employed a chartered landscape consultant (LandArb) to review the LVIA who recommended a number of changes similar to those suggested by the Landscape Officer. All the consultant's recommendations have been implemented and incorporated into a revised version document.</p> <p>In addition, the landscape consultant carried out a comparative assessment of six of the sites and reached the same conclusions about their suitability and, therefore, endorsed the assessment carried out by Woodcote Parish Council. As such, the Parish Council believe that this LVIA provides adequate and proportionate evidence in support of the Parish Council's aim to provide more housing in an AONB whilst conserving and enhancing the designated landscape.</p>

	<p>Landscape character; it is not clear whether this is limited to the effect on the immediate character of the site, or on the wider local landscape character area. It is usual practice to consider the effects on the various levels of character area, National, County and Local, and on the site itself; as a minimum the effect on local character areas as well as the immediate site character should be considered. The current SODC landscape character assessment no longer uses the conserve, restore etc categories.</p> <p>The overall effect is stated to be major, based on a high sensitivity and a high magnitude; however it is not clear how this has been derived, a high magnitude applies only to the effect on landscape character and land use; all other effects on landscape receptors after mitigation are shown to be neutral. Similarly, the calculation of the overall visual effect does not seem to relate to the findings with respect to individual views.</p> <p>For site WNP2-2, individual landscape effects are almost all negligible, neutral and low, but these result in a medium overall effect, and low and negligible effects on views result in a medium adverse overall effect. This does not seem consistent.</p> <p>For WNP2-25 the descriptions of landscape value, landscape condition and capacity for change don't seem to fit the values given.</p>	
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Appendix D Amendments to the Neighbourhood Plan following the Consultation

Section	Paragraph/Policy	Change
Foreword		Updated reference to CIL, updated url for other documentation
All		Replaced Greenmoor with Greenmore when referring to the road
1.4		Added reference to UK law
1.5		Expanded on review arrangements
2.3	Updates	Updated url for other documentation
2.4		Updated url for other documentation
3.1	Planning Policies	Removed reference to Core Strategy
3.3	Table 3.ii	Minor text change
4.1	Neighbourhood Area Boundary	Replaced map 4.ii
4.3		Updated local wildlife sites
4.4	Developed area	Replaced map 4.vi
4.5	Population	Clarified estimated population
4.5	Housing	Updated affordability figures and source references
6.4	Policy C4	Amended wording about traffic impact
6.5	Policy C5	Amended wording about traffic impact
7.1	Para after Policy T4	Only one bus stop now
7.1	Table 7.i	Updated figures, adding figures for England
9.1	Policy E1	Reworded to refer to major developments Added “where relevant” Baseline ecological survey removed Analysis of views reworded
9.3		Additional evidence to support policy E3 added, including reference to Oxfordshire Wildlife and Landscape Study
9.3	Policy E3	Wildlife replaced by Biodiversity Reference to baseline ecological survey added Measures for wildlife corridors and green infrastructure added
9.4		Additional evidence included and reference to separate evidence paper on Settlement Boundaries to support policy E4
9.4	Policy E4	Redevelopment added
9.4		Replaced map 9.i
9.5		Additional evidence included and reference to separate evidence paper on Local Green Spaces to support policy E5
9.5	Table 9.i	Local green space 8 split to reflect separate ownership
9.5		Replaced map 9.ii

9.5		Reference to appendix F added
9.6		Additional evidence included and reference to separate evidence paper on Important Views to support policy E6
9.6		Map 9.iii added to show public rights of way
9.6	Policy E6	Reference to map 9.iv added
9.6	Table 9.ii	Views 20 and 21 added
9.6		Replaced map 9.iv
9.7	Policy E7	Minor changes to wording
10.3	Number of new homes	Added more information about the approach taken
10.3	Table 10.i	Changed number of houses to reflect withdrawal of Goats Gambol
10.3	Policy H1	Minor amendment to wording Changed number of houses to reflect withdrawal of Goats Gambol
10.3	Policy H2	Minor amendment to wording
10.4	Affordable homes	Definition amended
10.5	Exception site affordable housing	Reference to policy H10 added Support from Parish Council removed
10.7	Retirement Housing Provision	Minor change to wording of final paragraph
10.9	Policy H9	Minor change to wording of first paragraph Change to privacy impact clause d.
10.9	Policy H10	Backland definition included in policy
11.5		Additional evidence added to support policy D6
11.5	Policy D6	Added reference to OCC cycle parking standards
12.1	Table 12.i	Allocation status updated Removed withdrawn site Goats Gambol
12.2		Delivery status updated
12.2		Replaced map 12.i
12.3	Policies HS2-HS4	Planning status moved to supporting text
12.3		Details of completed development site WNP-18 added
12.3	Policy HS8	Explanation of number of flats added
12.3	Policy HS10	Removed site specific policy for withdrawn site Goats Gambol
12.3	Policy ES3	Minor change to wording
13.1		Green infrastructure added to recommendations
Appendix A	Glossary	Definitions of affordable housing and affordable rented housing amended Definition of intermediate affordable housing removed
Appendix C		Policies updated to match changes in main text
Appendix D	D.3 AONB constraints	Reference to withdrawal of one site added

Appendix E	Important views	Replaced map Added photographs of views 20 and 21
Appendix F		Appendix added with maps of local green spaces