

Response 1

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation

Submitted on 2025-05-17 06:52:51

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Lynda Raynor

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

[REDACTED]

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Having reviewed the update Neighbourhood Plan I would like to register my approval of the revised version.

I am impressed by the work carried out on our Village Character and think the Design policy would help to preserve the character of the village and hopefully prevent further erosion of the character through some quite unsuitable extensions.

I applaud all the work carried out on the flooding policy as this is a particularly worrying area with the village streets being affected in recent months even though large developments have for the time being been held back. It will give valuable support to objections to any further attempts to develop around the village.

Green spaces, views and bio diversity are also covered well and it is hoped this plan is adopted as soon as the time restrictions allow

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

[REDACTED]

Response 2

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-20 10:34:59

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Miss

Name:
Grace

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[Redacted]

Address line 2:

[Redacted]

Address line 3:

Postal town:

Post code:

[Redacted]

Telephone number:

Email:
[Redacted]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We support it

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[Redacted]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 3

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-19 14:22:54

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
mrs

Name:
Joanna Carter

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I would like to strongly support the Warborough and Shillingford NDP Review document. It is an extremely thorough, well researched document which has been compiled following extensive analysis and very comprehensive consultation with the local community and stakeholders.

The research behind areas such as the design code show a commitment to the guardianship of the village vernacular and an understanding of the importance of protecting authenticity and integrity of our local achitecture. The village character policies are thorough and well researched with green gaps highlighted as crucial which I thoroughly support.

The flooding report shows a well developed understanding of the threat facing our village from a combination of fluvial, groundwater and surface water flooding problems. All of which must be considered as major considerations for any potential future development in the village. As with other aspects of the new NDP review document i thoroughly support the concerns and recommendations made in the report around managing the threat of flooding.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 4

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-19 15:08:41

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Jo Greenfield

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support the Neighbourhood Plan's policies, I especially feel that local flooding considerations should be mandatory in every planning decision. The design of any housing developments should reflect our local character and have to consider our community's views and local green spaces, enhancing our local biodiversity is something that also needs to be taken into consideration.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 5

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-20 10:26:21

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

mr

Name:

j kosobucki

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support this Neighbourhood Plan revision. We need local planning policies that reflect the local community, eg the Design Code is based on our local vernacular. We want to continue to have beautiful villages, and not have centuries of character erased by bland, ugly houses and developments. I support the local green spaces and green gaps in this review for the same reason.
The local flooding policy is really needed. We need flooding considerations to be taken seriously in our low lying, flat parish, surrounded as we are by water...

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 6

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-19 13:27:16

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Ms

Name:

A Kosobucki

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support this revision of the original Neighbourhood Plan.

In particular, I support the further details in the Village Character policies, for the Design Code, the Green Gaps and other landscape policies, as well as the flooding policy. I'm also pleased to see biodiversity being a priority.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 7

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-20 11:43:25

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Clare Lennon

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Warborough & Shillingford quite obviously sits in a high-risk flood area and with surface water flooding to the North and East, the parish is prone to flood on a regular basis during the wet months. Climate change has exacerbated this and it is plain to see that adding a large number of new dwellings will increase the problem, so the speculative development projects should be rejected on this point alone.

The Design code and green gap and landscape enhancement policies are particularly important, if we are to maintain our village character.

Speeding Traffic continues to be a problem in the village, so further measures are needed to try and mitigate this. In some areas of the village there are no footpaths, so it can be dangerous to walk, which means that cars are used more frequently than they should be. Implementing a 20mph speed limit might help, but other measures would also be advisable.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 8

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-26 11:20:53

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Richard

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support the proposed update to our plan because the NP team have kept us engaged in the proposed changes and adjustments. I am pleased to see a focus on design, to ensure that our local character is enhanced, planning decisions to consider our community views and the need for green gaps and local green spaces. Also the need to ensure that local flooding considerations are a mandatory part of planning decisions and the proposals to enhance local biodiversity.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

I require no changes to the proposals

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 9

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-30 20:54:29

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Robin McClelland

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support the Neighbourhood Plan document.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.



Response 10

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-05-31 19:16:15

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Alison Symonds

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support this plan which has been prepared in a highly professional manner.

I am pleased that the importance of flood risk and biodiversity have been highlighted.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 11

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-03 14:23:58

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Mr

Name:
Malcolm Munro-Faure

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[Redacted]

Address line 2:

[Redacted]

Address line 3:

[Redacted]

Postal town:
[Redacted]

Post code:
[Redacted]

Telephone number:
[Redacted]

Email:
[Redacted]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The proposed neighbourhood plan is very thorough and is the result of a significant amount of work. It is very comprehensive. Warborough is a small village in a very attractive part of the Thames Valley. It has retained a significant amount of character, and has a lot of open spaces which are important as it is so close to Oxford, Wallingford and Benson - all significant urban areas. The village has absorbed a moderate housing development over the past few years. The neighbourhood plan provides a basis for controlled development within the village, and protects the environment and local area from over-development - and the risk of becoming part of a 'suburban sprawl'. The village and local environment are important spaces which locals and visitors can enjoy. I hope that the proposed neighbourhood plan will be adopted.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 12

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-05 12:31:49

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Ms

Name:
M Lewicki

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[Redacted]

Address line 2:

[Redacted]

Address line 3:

[Redacted]

Postal town:
[Redacted]

Post code:
[Redacted]

Telephone number:
[Redacted]

Email:
[Redacted]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support the Warborough and Shillingford Neighbourhood Plan Review

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[Redacted]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 13

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-05 12:41:49

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Dr

Name:
Graham Barker

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[Redacted]

Address line 2:

Address line 3:

Postal town:

[Redacted]

Post code:
[Redacted]

Telephone number:
[Redacted]

Email:
[Redacted]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

This neighbourhood plan clearly sets out a sustainable way of protecting the environment we all call home, with scope for sympathetic development factoring local geography. In particular the due attention to any proposed amendments or additions that may alter flooding risks in the area feel more pertinent given the progressive change in local weather patterns. Any developments must factor in changes to flow of surface water before they are considered given the propensity for flooding recently observed on Court Drive, where residents have been flooded out of their properties. Any developments that do not increase the sewer capacity (such as new erections in existing dwellings gardens) pose a specific risk of placing further strains on sewer systems that are already frequently overwhelmed. New developments must have independent dedicated services rather than placing yet more strain on systems already bursting (operationally & physically). Protecting green spaces allows our biodiversity to be maintained within the area and must be maintained given the unique environment the area provides. This must be factored in when considering developments to any areas such as new developments or erections in existing dwellings gardens. The infill development sections (H2) provide a robust framework around new developments to ensure green spaces, light pollution, biodiversity and property character are protected. This will help ensure the safety of the current environment and preserve this as any development progresses in a sustainable and sympathetic manner.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

No changes proposed other than recognition of historical covenants current properties have, which have helped to maintain the character of the neighbourhood.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

To ensure all points can be heard and cross examined by residents within the neighbourhood and challenged appropriately before embarking on any developments

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

Response 14

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-05 18:38:45

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Mr

Name:
Michael Christopher Felstead

Job title (if relevant):
Retired

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:
[Redacted]

Address line 2:
[Redacted]

Address line 3:

Postal town:
[Redacted]

Post code:
[Redacted]

Telephone number:
[Redacted]

Email:
[Redacted]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We are very pleased with the NP revision for Warborough and Shillingford. It represents a huge piece of work and we are very grateful to those who have undertaken this task. We are fully supportive of the underlying analysis and recommendations of the Plan, in particular, the central argument, fully evidenced, that the Parish of Warborough and Shillingford is small, rural and should remain so.

Michael [Redacted] Felstead
[Redacted]
5 June 2025

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

N/A

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[Redacted]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[Redacted]

[Redacted]

Response 15

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-07 11:44:08

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

David Seymour

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The Neighbourhood Plan for Warborough Parish has, in my opinion, been produced sympathetically to meets the needs of our community.

It allows growth to occur but outlines a framework that gives a structure for any development.

Important additions have been explored to cover the growing pressures of biodiversity, our natural views and how any development would complement our historic village and hamlet.

I trust it will be endorsed and become our framework for our village development.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 16

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-07 14:43:33

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Sarah Allan

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support all the aims of the proposed Neighbourhood Plan. I believe it will protect the village from speculative development and continue to provide an environment in which to live a rural life.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 17

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-08 20:42:23

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Jane Winter

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

This revised plan has been carefully developed to address key issues such as climate change and biodiversity, while also incorporating major updates related to housing development as outlined in the Joint Local Plan and the National Planning Policy Framework. The plan aims to strike a balance between meeting evolving national and local needs and preserving the unique character and identity of our community.

As a resident of nearly 30 years, I strongly believe in protecting the rural setting and character of our village. Maintaining the green spaces and gaps between the village and surrounding hamlets is essential to preserving our distinctive landscape, open views, and the sense of space that defines our area. These qualities are deeply valued by the community and contribute to a strong, shared sense of place.

The Neighbourhood Plan Committee has engaged actively along the way with residents through a series of well-attended consultation events, ensuring that the updated plan and its new policies reflect broad local input and support.

I completely support this revised plan

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

[REDACTED]

Response 18

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-08 20:46:23

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

M

Name:

Joy Traube

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support the revised plan

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 19

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-08 21:42:12

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Meintje Newton

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I support the policies above

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 20

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-08 22:03:22

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Colin Newton

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support the policies as submitted in the neighbourhood plan

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 21

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-09 21:19:28

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Mr

Name:
Stephen Taylor

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:
[Redacted]

Address line 2:
[Redacted]

Address line 3:

Postal town:
[Redacted]

Post code:
[Redacted]

Telephone number:

Email:
[Redacted]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support the revised Neighbourhood Plan.
It has been thro' a thorough village consultation
I agree with the objectives and policies.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[Redacted]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 22

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-09 21:26:19

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Margaret Taylor

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

[REDACTED]

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support the revised Neighbourhood Plan

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 23

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-10 09:23:50

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Mrs

Name:
Clare Dewell

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I wholeheartedly support the Warborough & Shillingford Neighbourhood Plan Review.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 24

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-10 10:56:45

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Mrs

Name:
Gemma Barker

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support the attached neighbourhood plan to allow sympathetic expansion of the area whilst ensuring the area we live in is protected for future generations along with current residents. I think the explicit detail around flooding ensures this information is detailed and accurate - this MUST be factored in with any development to the surrounding area given the flood risks already exposed to local residents - [REDACTED]. Class sizes in school and over subscription of public services including doctors, schools and other amenities must be assessed when considering any future expansion of domestic accommodation in the area. Preservation of our green spaces is an essential investment the current generation must deliver, for future generations to come - we are all beneficiaries of the current area we live in, this should be passed on to those who follow us. The council must scrutinise reviews of permitted development & planning activity within the area to ensure people are not infringing rules for long term gain by stealth introduction of adjustments to properties and recognise the responsibility and trust the local residents place in their hands for oversight of the areas.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

I

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

To ensure all aspects of the argument can be heard in a public forum and discussion had around the best possible solution, rather than a closed door solution being presented as a fait accompli. The decision makers should be prepared to explain the working behind their decision making and confident enough that the discussion should be of suitable clarity and definition they feel prepared to stand up and discuss/explain their decision making

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

Response 25

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-10 17:41:02

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:
Mr

Name:
Richard Wicks

Job title (if relevant):
[REDACTED]

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:
[REDACTED]

Address line 2:
[REDACTED]

Address line 3:

Postal town:
[REDACTED]

Post code:
[REDACTED]

Telephone number:
[REDACTED]

Email:
[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The Warborough and Shillingford NDP Review has my complete support and I would like to thank all those contributors who have made this possible.

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?
[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

☐

Response 26

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation

Submitted on 2025-06-11 20:17:19

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

[REDACTED]

Name:

[REDACTED]

Job title (if relevant):

[REDACTED]

Organisation (if relevant):

Rectory Homes Ltd

Organisation representing (if relevant):

Rectory Homes Ltd

Address line 1:

Rectory House,

Address line 2:

Thame Road,

Address line 3:

Postal town:

Haddenham

Post code:

HP18 0AY

Telephone number:

[REDACTED]

Email:

[REDACTED]@rectory.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

Warborough and Shillingford Neighbourhood Plan Comments.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

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☐

1. Introduction

- 1.1 These representations are made by Rectory Homes Ltd a family-owned house builder based in Buckinghamshire. Rectory Homes Ltd work locally within South Oxfordshire and The Vale of White Horse, as well as surrounding districts of the Western Home Counties delivering small to medium sized developments, up to approximately 90 units, with our typical developments in the region of 10-50 units.
- 1.2 As a local SME house builder, Rectory have an interest in a potential development site within the Neighbourhood Plan area located at the northern end of Warborough.
- 1.3 This document will respond to the Regulation 16 Draft Neighbourhood Plan Review document, by way of the potential implications of the Neighbourhood Plan to Rectory Homes Ltd as an organisation as well as the specific policies that might impact the proposed site located within the Plan Area.

2. Who are Rectory Homes

- 2.1 Rectory Homes Ltd are a local SME House Builder. Founded in 1991 the company is located in Haddenham, Buckinghamshire, Rectory pride themselves on building out design led out developments in the local area to exacting standards.
- 2.2 As a Local SME house builder our track record of delivering sites is exemplary, with unparalleled turnaround from receiving planning consent to delivering homes and welcoming new residents on site often within two years.
- 2.3 Over the last 10 years, market conditions have been complex, however Rectory have maintained a great record of delivery, despite, as an SME being less protected by the market fluctuations than larger house builders.
- 2.4 Table 1 shows Rectory's track record of completions over the last 9 years. Only one site took over two years from receiving outline planning permission to the first home being completed.

Table 1 – Rectory Homes' Delivery Track Record							
Site	No of Units	OUT approval	RM/Full Application submitted	RM/Full Application Approval	Construction Start	First Home Completion	Total Time (outline first completion)
Wainwrights, Long Crendon	19	21.12.2016	21.04.2017	24.11.2017	2.07.2018	03.10.19	1 years 11 months
Leighton Road, Wingrave	29		24.11.2017	29.11.2019	30.09.2020	22.10.21	1 years 11 months
Fairfields Farm, Haddenham	14		08.05.2017	08.03.2018	20.06.2018	28.06.19	1 year 3 months
Stanbridge Road, Haddenham	40	15.12.2016	20.12.2016	4.04.2017	24.04.2017	13.04.18	1 year
Aylesbury Road, Aston Clinton	50	19.01.2015	02.09.2015	4.02.2016	8.12.2017	26.10.18	2 years 9 months
Reading Road, Woodcote	34		01.07.2020	15.07.2021	10.08.2021	19.08.22	1 year 1 month
Thame Road, Warborough	29		20.01.2017	31.07.2019	3.10.2019	15.02.21	1 year 6 months
Turnfields, Ickford	30		24.02.2021	28.06.2022	10.07.2022	20.11.23	1 year 5 months
AVERAGE							1 year 7 months

- 2.5 Rectory truly believe that SME house builders are vital for the delivery of new housing in this country, and that as per paragraph 73 of the NPPF, support should be offered to

organisations such as Rectory Homes Ltd to ensure a widespread vernacular of housing is delivered. Paragraph 73 of the 2024 NPPF states:

‘73. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing;

c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;

d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

2.6 Research shows that there is an ever-increasing reliance on the large house builders, with a 2021 paper published on major housebuilders in the UK stating that in 2015 **47%** of houses completed were constructed by the top 10 house builders ¹. Since that point, there is no doubt that the market has suffered further changes, and specifically the sustained loss of small to medium house builders.

¹ Archer, T., Cole, I. The financialisation of housing production: exploring capital flows and value extraction among major housebuilders in the UK. *J Hous and the Built Environ* **36**, 1367–1387 (2021). <https://doi.org/10.1007/s10901-021-09822-3> (p. 1371).

3. Policy

3.1 Overview

- 3.1.1 This representation is submitted in response to the Warborough and Shillingford Neighbourhood Plan, and it raises a fundamental concern regarding the premature timing and strategic basis of the Plan. The Neighbourhood Plan is being brought forward amongst recent changes to national planning policy, particularly in relation to how housing need is assessed and distributed. As such, the Plan appears to rely on outdated housing requirement figures and methodologies that are no longer reflective of current planning policy or the direction of housing growth in South Oxfordshire.
- 3.1.2 The 2024 update to the NPPF reinforces and aligns with the new Labour Government's commitment to significantly boosting the supply of homes. It introduces a new standard method for calculating housing need, now based on a minimum of 0.8% of existing housing stock annually, with adjustments made for affordability. This method has resulted in a considerable increase in the housing requirement across South Oxfordshire—from 579 to 1,179 dwellings per annum—highlighting a clear expectation for local plans and neighbourhood plans alike to make a positive and proportionate contribution toward meeting this need.
- 3.1.3 Despite this national and district-level policy context, the Neighbourhood Plan does not allocate any specific site for new housing delivery. This omission is not consistent with the expectations of the NPPF, which encourages neighbourhood plans to allocate sites to help deliver the development required in their area. Furthermore, in light of South Oxfordshire's identified shortfall in five-year housing land supply (currently 4.5 years), there is a heightened imperative for neighbourhood plans to play an active role in addressing local housing needs and helping to maintain a continuous supply of deliverable sites.
- 3.1.4 In summary, the Warborough and Shillingford Neighbourhood Plan is being advanced using an outdated housing context that no longer reflects national or district-level policy. Without recalibration to align with the revised housing supply calculations and without the allocation of sites to meet local need, the Warborough and Shillingford Neighbourhood Plan risks being considered out of conformity with strategic planning policies and failing to deliver sustainable growth for the community.

3.2 Policy H1: Housing

- 3.2.1 In Policy H1: Housing, the draft neighbourhood plan states that the housing needs of the village are for more small housing units and independent elderly homes. The evidence submitted with the draft plan supports this; however, the neighbourhood plan does not seek to allocate any sites for housing. By not allocating any housing sites the opportunity for development to be brought forward in the villages are limited to only infill or subdivision, which will not result in the bringing forward of the development identified as needed in the supporting documents.
- 3.2.2 Overall, the neighbourhood plan appears to be overly anti-development and the concept that no new housing is expected to be delivered up to 2041 other than small infill development does not offer a solution to the housing needs outlined in the supporting documents. The neighbourhood plan does not allow for any growth within the village, or to allow for the village to retain key members of the community through the provision of new housing to meet the needs of the community.
- 3.2.3 The absence of site allocation policies within the 2025 Neighbourhood Plan review document is an attempt to prevent further construction of housing developments within Warborough and is not in line with Paragraph 30 of the 2024 NPPF, which states that:
- *‘30. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies’ (NPPF, 2024, p.11).*

3.3 Policy C3: Local Green Spaces

- 3.3.1 The revised draft neighbourhood plan seeks to retain the existing green spaces and to allocate further new local green spaces. In the previous neighbourhood plan 4 green spaces were allocated. The new neighbourhood plan seeks to further increase the number of green spaces.
- 3.3.2 Whilst the value placed on green spaces is understood, it is also recognised that the designation of these spaces should not be used to prevent development within an area. The NPPF paragraph 107(c) states that for local green space to be allocated it must be local in character and not extensive in size:
- *‘107. The Local Green Space designation should only be used where the green space is: ... c) local in character and is not an extensive tract of land’ (NPPF, 2024, p. 30).*

- 3.3.3 The proposed site is not listed as part of the green spaces policy (C3) list, as the site is further north of the extent of the local green spaces map provided. The site is in the northern part of Warborough, meaning that there is no risk of the site being responsible for closing the proposed 'green gap' (Site 1 - Plough Field) between Warborough and Shillingford.
- 3.3.4 The overall size of the proposed local green spaces being sought to be designated does cumulatively result in an extensive tract of land. Furthermore, there is not clear evidence that the proposed green spaces will meet the requirements to become designated.

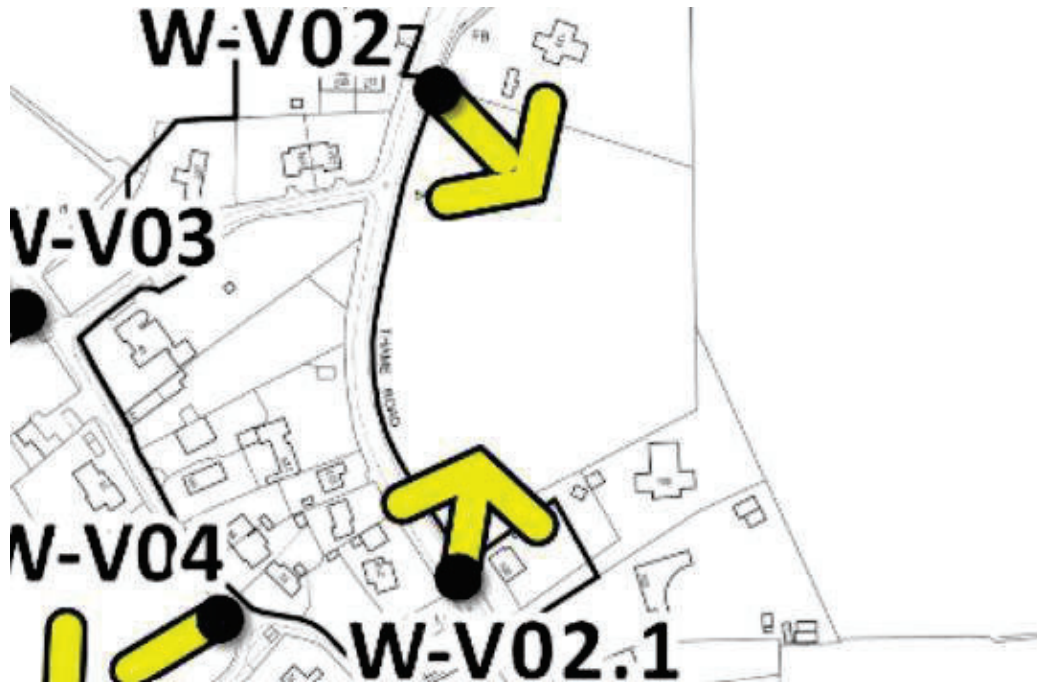
3.4 Policy VC2: Landscape and Green Gaps

- 3.4.1 Policy VC2 highlights three areas of green space to be retained as a Green Gaps including the proposed development site on Thame Road. The site is designated as Site 2 and is located within Grade 3 agricultural land, with the site being selected as a gateway site for accessing the nearby conservation area.
- 3.4.2 Whilst it is understood that the neighbourhood plan plays a pivotal role in preserving the character and identity of the villages, it is felt that by seeking to protect the key potential development sites within the area, it is preventing any potential development opportunities within the village.
- 3.4.3 The character of the village is frontage development with housing following a linear pattern throughout the village. Should further development be required to come forward during the lifetime of the neighbourhood plan to meet the currently unmet housing needs, the areas proposed to be protected would be the most logical to ensure it retains the existing landscape and development character of the village.

3.5 Policy VC3: Important Views

- 3.5.1 The protection of important local views is a vital part of a neighbourhood plan and supports the protection of the character and appearance of the village, ensuring it remains largely similar over time. However, there are concerns that the draft neighbourhood plan seeks to add a further 9 protected local views, in addition to the existing 8 protected views. The proposed site is directly impacted by two of these Important Landscape Views W-V02 and W-V02.1 classed as having a high sensitivity. Whilst views of the open countryside should be protected, it should not be the case that this legislation be used to prevent development within the area.
- 3.5.2 The addition of W-V02.1 as a draft important local view, is considered to not be sound or reasonable. The proposal to add a further protected view to cover the same area appears overly restrictive. Furthermore, the view proposed to be protected does not

allow for views into the paddock, or of Wittenham Clumps due to the direction of the proposed protected view.



Screenshot from Figure 20. Important Views – Warborough

4. Potential Development Site

4.1 Proposal for development at Cuckoo Penn, Warborough

- 4.1.1 There have been several concept plans and proposals considered for this development site, and feedback received previously by WSPC and the LPA have been considered in the revised plans. The below concept plan is the latest idea for a development site that would allow for a modest scheme within the settlement boundary. It is reduced in mass and scale and reflects the linear development pattern seen throughout the village. Further discussions with the Parish Council would be welcomed to discuss the way in which this development site could be bought forward.

4.2 Indicative Site Plan



5. Conclusion

- 5.1 The Warborough and Shillingford Regulation 16 Neighbourhood Plan Review, as currently drafted, is premised on outdated housing need assessments and does not adequately respond to the updated national planning framework set out in the NPPF 2024. The Plan's failure to allocate any new housing sites and address the role of SME house builders fundamentally limits the village's ability to meet identified housing needs, particularly for smaller units and independent elderly homes, as evidenced in its own supporting documents.
- 5.2 Furthermore, the Plan's approach to land designations, especially in relation to the extensive expansion of Local Green Spaces and the protection of multiple Important Views, appears to restrict opportunities for sustainable growth and effectively prevents development in locations most appropriate for housing delivery. While it is crucial to preserve the character and environment of Warborough and Shillingford, this must be balanced with the imperative to provide homes that support the community's long-term vitality.
- 5.3 In its current form, the Plan is not in line with paragraph 30 of the NPPF, which requires neighbourhood plans to support, rather than undermine, strategic policies and to contribute positively to meeting local housing needs. To align with national and district-level policy, it is essential that the Warborough and Shillingford Neighbourhood Plan is revised to reflect the new housing requirement methodology, allocate appropriate sites for development, and ensure a balanced approach to protecting green spaces and views without unnecessarily constraining growth.
- 5.4 In addition, while the decision not to allocate housing sites may remain technically permissible under the current legal framework, it is increasingly inconsistent with the evolving direction of national housing policy. The recent change in government has brought a renewed and urgent focus on significantly increasing housing delivery across England, with the new administration committing to building 1.5 million homes over the next parliament. Local authorities—particularly in high-demand areas such as South Oxfordshire—are expected to come under growing pressure to accommodate much higher levels of growth. Against this backdrop, the decision to advance a neighbourhood plan that deliberately avoids allocating any housing land is strategically short-sighted. It risks leaving the parish poorly positioned to respond to future policy changes, undermining both the sustainability and the long-term resilience of the

settlement. Now
meaningfully to

is not the appropriate time to adopt a Plan that fails to contribute
housing delivery or prepare the village for future needs.

Response 27

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation

Submitted on 2025-06-12 16:13:47

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

John C

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Post code:

Not provided

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I am fully in support of the Plan

John C

[REDACTED]

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

Response 28

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:15:10

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Property Town Planner

Organisation (if relevant):

Thames Water

Organisation representing (if relevant):

Thames Water

Address line 1:

1st Floor West

Address line 2:

Clearwater Court

Address line 3:

Vastern Road

Postal town:

Reading

Post code:

RG1 8DB

Telephone number:

[REDACTED]

Email:

[REDACTED]@thameswater.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

[REDACTED]

[REDACTED]

Property Town Planner

[REDACTED]

[REDACTED]@thameswater.co.uk

1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

You can upload supporting evidence here:

25.06.04 Shillingford NP Reg 16 issued (1).pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]



E: [REDACTED]@thamewater.co.uk
M: [REDACTED]

Issued via email:
planning.policy@southandvale.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

04 June 2025

South Oxfordshire District – Warborough & Shillingford Revised Neighbourhood Plan Submission Draft - Regulation 16 Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the South Oxfordshire District and hence are a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Policy Omission - Water Supply and Wastewater/Sewerage Infrastructure

As set out in relation to Regulation 14 consultation, we support the reference to water supply and sewage disposal in Policy ENV2- Mitigating Flood Risk Part (b) to (d), but consider it is such an important issue that ideally there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2024, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Paragraph 5.5.36 Water Efficiency

We support the references to water consumption, but consider that this needs to be strengthened.

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

In light of the above, we consider that the Neighbourhood Plan should include the following policy:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Policy ENV2 - Comments in relation to Flood Risk and SUDS

As set out in relation to Regulation 14 consultation, we support the reference to water supply and sewage disposal in Policy ENV2- Mitigating Flood Risk Part (b) to (d), but consider it is such an important issue that ideally there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.

In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

Development Sites

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

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,

[REDACTED]

Thames Water Property Town Planner

Response 29

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:18:44

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Business Officer

Organisation (if relevant):

Historic England

Organisation representing (if relevant):

Historic England

Address line 1:

4th floor

Address line 2:

Cannon Bridge House

Address line 3:

25 Dowgate Hill

Postal town:

London

Post code:

EC4R 2YA

Telephone number:

0207 973 3036

Email:

[REDACTED]@historicengland.org.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear [REDACTED]

Thank you for writing and clarifying that post-submission responses should be sent to you at the District Council, which I note for future reference.

My apologies for making the error in directing our response to the Parish Council, and I am very glad to learn that they kindly forwarded it to you.

With best regards,

[REDACTED]

[REDACTED]

Business Officer, London and South East Region (Oxfordshire)

Historic England, 4th floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

T: 0207 973 3036

NB: Usual working days are Monday-Thursday.

You can upload supporting evidence here:
Historic England.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]



Historic England

The Parish Clerk,
Warborough Parish Council,
The Great Hall,
Thame Road,
Warborough,
Oxfordshire,
OX10 7DH

Our ref: PL00797444

[REDACTED]
by email only

27 May 2025

Dear Sir / Madam,

Ref: Warborough and Shillingford Neighbourhood Plan Review Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on e-seast@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[REDACTED]
Historic Places Advisor
E-mail: [REDACTED] [@historicengland.org.uk](mailto:[REDACTED]@historicengland.org.uk)



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Response 30

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:22:04

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):
Planner

Organisation (if relevant):
National Gas

Organisation representing (if relevant):
National Gas

Address line 1:
Central Square

Address line 2:
Forth Street

Address line 3:

Postal town:
Newcastle upon Tyne

Post code:
NE1 3PJ

Telephone number:
[REDACTED]

Email:
nationalgas.uk@avisonyoung.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Gas.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgas.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards
[REDACTED]

[REDACTED]
Planner
Mobile [REDACTED]
[REDACTED]@avisonyoung.com | avisonyoung.com

You can upload supporting evidence here:

06-06 National Gas (1).pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]



Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/ 15B901605

06 June 2025

South Oxfordshire District Council
planning.policy@southandvale.gov.uk
via email only



Dear Sir / Madam

**Warborough and Shillingford Neighbourhood Plan - Regulation 16 Consultation
April – July 2025
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



[REDACTED] Director

nationalgas.uk@avisonyoung.com

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

[REDACTED] Asset Protection Lead

[\[REDACTED\]@nationalgas.com](mailto:[REDACTED]@nationalgas.com)

National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[REDACTED]

Director

0191 269 0094

[REDACTED]@avisonyoung.com

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Response 31

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:27:08

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Partner

Organisation (if relevant):

Carter Jonas

Organisation representing (if relevant):

Wellbeck Strategic Land

Address line 1:

Mayfield House

Address line 2:

256 Banbury Road

Address line 3:

Summertown

Postal town:

Oxford

Post code:

OX2 7DE

Telephone number:

Email:

@carterjonas.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam,

Revised Warborough & Shillingford Neighbourhood Development Plan (W&SNDP) – Submission Consultation.

Please find attached herewith, comments duly made in reference to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Localism Act 2011, on behalf of Welbeck Strategic Land, in response to the above listed Neighbourhood Plan consultation.

Thank you, and kind regards

Classification L2 - Business Data

Partner

Carter Jonas

T: 01865 819637

|
M: [REDACTED]

|
carterjonas.co.uk

Mayfield House, 256 Banbury Road, Summertown
,
Oxford
,
OX2 7DE

You can upload supporting evidence here:
Warborough Shillingfrod NDP_Reg. 16_Welbeck Strategic (1).pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Mayfield House
256 Banbury Road
Oxford
OX2 7DE

T: 01865 511444

F: 01865 310653

Your ref:

Our ref: PC/W&SNDP/R16

Planning Policy

Abbey House,
Abbey Close,
Abingdon
OX14 3JE

By email only: planning.policy@southandvale.gov.uk

9th June 2025

Dear Sir/Madam,

Revised Warborough & Shillingford Neighbourhood Development Plan (W&SNDP) – Submission Consultation.

Comments duly made in reference to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Localism Act 2011.

1.0 INTRODUCTION

- 1.1 Carter Jonas LLP acts on behalf of Welbeck Strategic Land II LLP (“Welbeck”), which – as you are aware – benefits from a promotion agreement over Land North of New Road, Shillingford (“the Site”). Carter Jonas has been instructed to respond to the Warborough Parish Council’s (“the Council”) Revised Neighbourhood Development Plan, and the above listed (Reg. 16) consultation.
- 1.1 The site is identified in the South Oxfordshire & Vale of White Horse Housing & Economic Land Availability Assessment (HELAA) (January 2024) as site reference SH774. The HELAA suggests that the site is not ‘suitable’ for development.
- 1.2 However, Welbeck suggests that Land North of New Road is a sustainable, and deliverable location for much needed new residential development, including in helping to meet the local need for Affordable Housing (there are currently 32 households on the South Oxfordshire Housing Register seeking accommodation in Warborough & Shillingford).
- 1.3 The HELAA suggests that the site is not ‘suitable’ for development because it is Grade 1 agricultural land. Welbeck has, taken expert advice on the matter of the agricultural land, and the development of 4.9 ha of “Best and Most Versatile” agricultural land falls well below the threshold for automatic consultation with Natural England (20ha) it cannot, in the expert consultant’s opinion, be considered “significant development of agricultural land.” Welbeck also has correspondence from the landowner which explains that the loss of the land from agriculture would not be economically disadvantageous.
- 1.4 The site is also, of course, available for development.
- 1.5 Welbeck’s case for the development of Land North of New Road was presented in planning application reference: [P23/S4082/O](#) and the subsequent planning appeal. The appeal was withdrawn on the basis of changing flood information.

- 1.6 Welbeck is aware that the Environment Agency is still reviewing its flooding information at Warborough and Shillingford, and the Flood Map for Planning is due to be updated again in the near future.
- 1.7 We have reviewed the W&SNDP, and its supporting evidence and hereunder provide comments on the draft plan.
- 1.8 We are primarily concerned with four areas of the draft W&SNDP. These areas are:
- (a) Local sustainability;
 - (b) Landscape and local character;
 - (c) flooding, and
 - (d) transport.

The basic conditions and national policy

- 1.8 For a Neighbourhood Development Plan to be considered acceptable for adoption by a Local Planning Authority – for it to be ‘made’ and become part of the Development Plan – it should conform to the basic conditions.
- 1.9 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are (conditions b & c not referenced as they relate only the neighbourhood development orders):
- a. *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.*
 - d. *the making of the neighbourhood plan contributes to the achievement of sustainable development.*
 - e. *the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
 - f. *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
 - g. *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*

National Planning Policy Framework (NPPF)

- 1.10 When they are being drawn up, Neighbourhood Plans are required to have regard to national planning policies and guidance.
- 1.11 Paragraph 13 of the NPPF is clear that:
- “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”*
- 1.12 More specifically, paragraph 29 of the NPPF states that:
- “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.*

Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”

- 1.13 Paragraph 30 of the NPPF, then states:

“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”

Planning Practice Guidance (PPG)

- 1.14 Supporting the NPPF is a range of guidance, and the two most relevant sections of this guidance in the case of the proposed Local Green Space designation are:

Paragraph: 007 Reference ID: 37-007-20140306: *Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.*

Paragraph: 015 Reference ID: 37-015-20140306: *There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.*

Paragraph: 018 Reference ID: 37-018-20140306: *Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation.*

- 1.15 In the following paragraphs I set out Welbeck’s concerns regarding the W&SNDP, and the Basic Conditions.

2.0 LOCAL SUSTAINABILITY

- 2.1 There are a range of services and facilities in Warborough and Shillingford, and it is on one of the most frequent, and best served bus routes in the district – if not the county – between Reading and Oxford. Warborough and Shillingford is a very sustainable location for future development. Indeed, the recent planning application and appeal received strong support from the bus operator Thames Travel, in a letter it was explained that:

“Thames Travel operates the X40 “River Rapids” service between Reading, Woodcote, Wallingford and Oxford following the A4074 corridor, thus also serving Shillingford. This route has seen substantial patronage growth prior to 2019, and this has now fully recovered from the very serious impacts of COVID-19 and the accompanying public health crisis. Fare-paying passengers now exceed 2019 levels, which more than offsets the lesser use by concessionary pass-holders, eligibility for which has continued to decline over the intervening period as a result of Government policy, among other things. This well

demonstrates the high and rising relevance of the service to residents of all communities on the line of the route.

The service has run three times per hour between Wallingford, Shillingford and Oxford between 2017 and 2020, and currently operates on a half-hourly frequency, as indicated by table 3.3 of the Transport Assessment ("TA") accompanying the application. The route also benefits from an extensive timetable coverage in the evenings, with a half-hourly service to 2100 and last departures from Oxford at just after 2300, with a late night service NX40 running on Friday and Saturday nights. On Sundays an hourly service is offered...

...The new timetable is expected to provide evening services every 30 minutes till after 2000h thereafter hourly until after midnight from both Oxford and Reading, all days of the week except Sunday when the last departure will be after 2300h. Daytime Sunday frequency will increase from hourly to every 30 minutes...

...Thus, from the time this takes effect, Shillingford will enjoy a level of service that exceeds some parts of Oxford City in terms of frequency and hours of operation. Revenue support funding for this intervention is mainly sourced from already-collected developer funding, supplemented by additional BSIP+ funding from central government, allowing a suitable support period to be sustained with the enhanced service expected to be commercially self-sustaining thereafter...

...It is relevant to point out that no other bus route in South Oxfordshire offers this level of service. The implementation of this improvement will present Shillingford residents, including any on the proposed site should it be consented, with a highly relevant and credible public transport choice for journeys to a significant number of destinations outside the village. This is a near-unique locational benefit enjoyed by Shillingford. It would benefit from a higher level of bus service, by a substantial margin, than that enjoyed by any of the "Larger Villages" designated in the Local Plan, apart from the far western end of Benson."

- 2.2 Therefore, it is vexing to read in the W&SNDP that Warborough and Shillingford operate in some kind vacuum from each other. Whilst many of the services for the local community are in Warborough, the primary school is on the border between the two locations, and according to some assessments – which sees 'Green Lane' as the separation between Warborough and Shillingford – the school is in Shillingford. The key point, however, is that the services and facilities of Warborough and Shillingford are shared, many are even named as shared, and to ignore the fact that there is a very sustainable and very well used bus service which the combined community uses is illogical.
- 2.3 Shillingford includes bus stops for a very regular service – including the X40 / X39 between Oxford and Reading – making it one of the best-connected locations in South Oxfordshire (without a railway station).
- 2.4 The proximity to other settlements which may offer different, or a wider variety services and facilities suggests that Warborough and Shillingford should – in operation, and in terms of locational sustainability – be considered as a single location.
- 2.5 The character of the settlements is a separate spatial point, which should not cloud the assessment of available services and facilities, and the potential for future growth.

3.0 LANDSCAPE AND LOCAL CHARACTER

- 3.1 We wish to raise very serious concerns about the approach taken to landscape and local character in the W&SNDP.
- 3.2 We are not convinced by the evidence which underpins proposed policies VC1 and VC2, and the proposed Local Green Spaces. These elements of the W&SNDP are therefore not robustly justified. Nor has there been any direct consultation or correspondence on the matter of Local Green Space with the landowners.
- 3.3 There are a range of general points made in the W&SNDP and its supporting information which refer to the setting of Areas of Outstanding Natural Beauty (aka National Landscapes) and other landscape character areas, however, the area of greatest concern to our clients is that which covers land referred to in the W&SNDP as “Plough Field.”
- 3.4 Reviewing what is recorded in the evidence for the W&SNDP, it is most clearly summarised as follows:

“Plough Field - this gap is the last remaining gap between the villages of Warborough and Shillingford. The gap extends over a flat area of land, which currently provides a clear visual separation between the two settlements as one approaches from the east.

- When viewed from the edge of Warborough travelling toward Shillingford, there are hedgerows along Thame Road and New Road, which can block views in summer months (when the hedges have not been cut), but at other times of the year there are full and uninterrupted views.*
- There are also a number of key public vantage points which are also open year-round along the field edges.*
- As the last remaining field between the two settlements, it is key that this should not be developed to maintain the separate identities of the settlements, which are distinctly different.”*

- 3.5 Welbeck’s evidence (prepared by FPCR Environment and Design Ltd) for the planning application, and withdrawn appeal, demonstrates that development of the site could be delivered in a sensitive way, so long as an appropriate landscape scheme is included.
- 3.6 With the application for development on the stie, Welbeck submitted a Landscape and Visual Assessment (LVA). The LVA contains an appraisal of landscape value from paragraph 4.26. This examined the role of the site and its immediate context in terms of the range of local factors set out in the Landscape Institute’s Technical Guidance Note 02-21, Assessing Landscape Value outside of National Designations. The LVA concluded that the site and its immediate context was of “Medium” landscape value.
- 3.7 Appended to this letter is a set of photomontages which demonstrate that the effect of development on the site might well be felt in close proximity, but the effects are negligible in longer distance views, especially when looking towards Warborough & Shillingford from the east.
- 3.8 The assessment of landscape Value in the LVA did not reference the use of the site as part of the wider site for the World Ploughing Contest in 1954. Some information on the history of this event is set out in the Parish Character Appraisal, part of the W&S NDP, dated October 2024. The site for the competition extended a considerable distance towards Benson. A commemorative cairn with a plough was installed on the bend along New Road. Whilst the original Plough was stolen, a replacement has been installed. We have reviewed this information and consider that the use of the site for the competition, will be of local interest, and this contributes towards the factor

“associations” when considering landscape value. This does not however change the overall judgement on the landscape value of the site as “Medium”.

Landscape effects

- 3.9 Welbeck can demonstrate that development would have:
- no harm to the special qualities of the North Wessex Downs National Landscape
 - no harm overall on the special qualities of the Chilterns National Landscape
 - no effect on the National Landscape Character area of “Upper Thames Clay Vale”; and
 - Minor Adverse effects at scheme completion, reducing to Negligible - Minor Adverse at year 15, on local Landscape Character ‘Area 4: River Thames Corridor’
- 3.10 Welbeck acknowledges that development will inevitably alter the site itself, however effects will be localised to the site and its immediate context primarily due to boundary vegetation and enclosure provided by structural planting. The development proposals can follow design guidance relevant to the area to minimise potential effects.
- 3.11 Regarding coalescence, Welbeck’s evidence demonstrates that existing development on Thame Road already extends and is visible along the western side of the route between Warborough and Shillingford, with no discernible physical gap between the settlements. There is also intervisibility between residential development to the north and south of the site at Gravel Lane and New Road. As such, it is considered that the site itself makes a very limited contribution to any perceived sense of settlement separation. Warborough and Shillingford are already joined by an area of more mixed development, between the historic cores of the villages, which are both designated Conservation Areas.

Visual, character, effects

- 3.12 Turning to visual effects, and the potential for development on the site to impact on local character. Welbeck accepts that for residents of New Road and Gravel Lane the development will represent an obvious and recognisable change to their aspect. However, mitigation can be provided by proposed Green Infrastructure and the residential configuration can reduce the effects.
- 3.13 Visual effects on residents of Thame Road are likely to be reduced by existing vegetation screening and the distance of new homes from the shared edge, and the potential for landscape planting once it has established and matured.
- 3.14 Residents away from the site to the east are likely to experience minor visual effects once development is completed however, these will decrease to negligible once landscape planting establishes and the site integrates with the landscape and settlement context.
- 3.15 For users of footpaths in the vicinity Welbeck’s evidence demonstrates that effects would be as follows, if development was delivered:
- Warborough 392/6/30: Moderate Adverse on completion but at year 15, effects are likely to reduce to Minor - Moderate Adverse.
 - Warborough 392/17/10, Bridleway Warborough 392/16/10 and Bridleway Benson 125/10/10: Moderate - Minor Adverse on completion, once planting in the eastern green corridor has established and matured effects are likely to reduce to Minor Adverse.
 - Millennium Way Permissive Path: Minor – Moderate Adverse on completion and reduce to Minor Adverse – Negligible at year 15

- Bridleway Warborough 392/15a/10: Minor Adverse – Negligible at completion and reducing to Negligible – Minor Adverse at year 15
 - routes within North Wessex Downs National Landscape: Minor Adverse – Negligible on completion, as the scheme further integrates with the context through the establishment of proposed vegetation effects will reduce to Negligible
 - routes in the Chilterns National Landscape: Negligible at completion and once planting on the eastern edge further establishes views of the site will be further filtered and softened.
- 3.16 Welbeck notes that in its recent refusal of development on the site that the District Council did not allege harm to the Areas of Outstanding Natural Beauty (National Landscapes), only harm to views towards them. Welbeck's opinion is that there would be a negligible effect on the Wessex Downs and the Chilterns, as the development would be barely visible from the designated areas, and if it is seen would be at such a distance to just be read as part of the wider existing settlement, causing no harm overall to the special qualities of either National Landscape.

Local Green Space

- 3.17 The suggested justification – on page 35 of the W&SNDP - for creating a Local Green Space of "Plough Field", appears to rest on an assessment that the site is a "public vantage point," and it is of local cultural value. Welbeck notes that there is no mention of 'coalescence' at this point in the W&SNDP.
- 3.18 First, there is no public access to the site and there are limited public views across the site. Views are constrained by the hedges at the filed boundary, and there is nothing to suggest that development on the site would reduce or restrict views of the National Landscapes beyond the Parish. Indeed, and to the contrary, development of the site would open up views, and make them truly publicly accessible.
- 3.19 Second, the cultural value of the site is reduced by the acknowledgement in the Warborough and Shillingford Parish Character Appraisal – page 15 – that the ploughing championship area (and the areas of actual ploughing) – extended well beyond the site itself. Indeed, the site was an access point and partially a space for exhibition so its direct links to the cultural interest, and the location of the cairn are limited.
- 3.20 Returning to the continued reference that the site is the "*last remaining gap between the villages of Warborough and Shillingford*". Welbeck notes that in national planning policy the notion of coalescence is only mentioned in one place, and that is in reference to the purposes of the *Green Belt* (with our emphasis):

"143. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

- 3.21 Therefore, we are very concerned that the Local Green Spaces in general, and specifically at “Plough Field” are an attempt at creating Green Belt. This is something that is a strategic matter, and only acceptable through Local Plans where there are exceptional circumstances (see NPPF paragraph 144). Welbeck also notes that the parish includes an element of the Oxford Green Belt which could have been extended across the whole parish but it was not when first created, nor has it been strategically suggested at any point since.
- 3.22 The cumulative effect of the **18** proposed Local Green Spaces, has the potential to conflict with Planning Practice Guidance (PPG) which warns against trying to create a local level Green Belt through a neighbourhood development plan. For the Parish Council’s reference, the PPG – which refers to Local Green Space, is as follows:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”

(Paragraph: 015 Reference ID: 37-015-20140306)

4.0 FLOOD RISK

- 4.1 Welbeck is doubtful about the presented extent of flood risk in Warborough & Shillingford and has been advised by the Environment Agency that it has temporarily delayed releasing the Flood Map for Planning, covering the villages of Drayton St Leonard, Newington and Shillingford, as the Agency has encountered issues with their wider flood model. Correspondence from the Environment Agency confirms that this is not linked to Welbeck’s land interests and the application / appeal but is an issue with the wider area as a whole. The updated mapping is expected in Summer 2025, albeit no fixed month has been provided.
- 4.2 Welbeck has reviewed the W&SNDP flooding information together with its consultants Floodline and hereunder makes observations and comments in its regard.
- 4.3 First, it is noted that in the Steering Group Minutes of 04 October 2024, at paragraph 19.13 that:

“Very few examples [of flooding are] caused by river flooding.”

- 4.4 In the Executive Summary it states that:

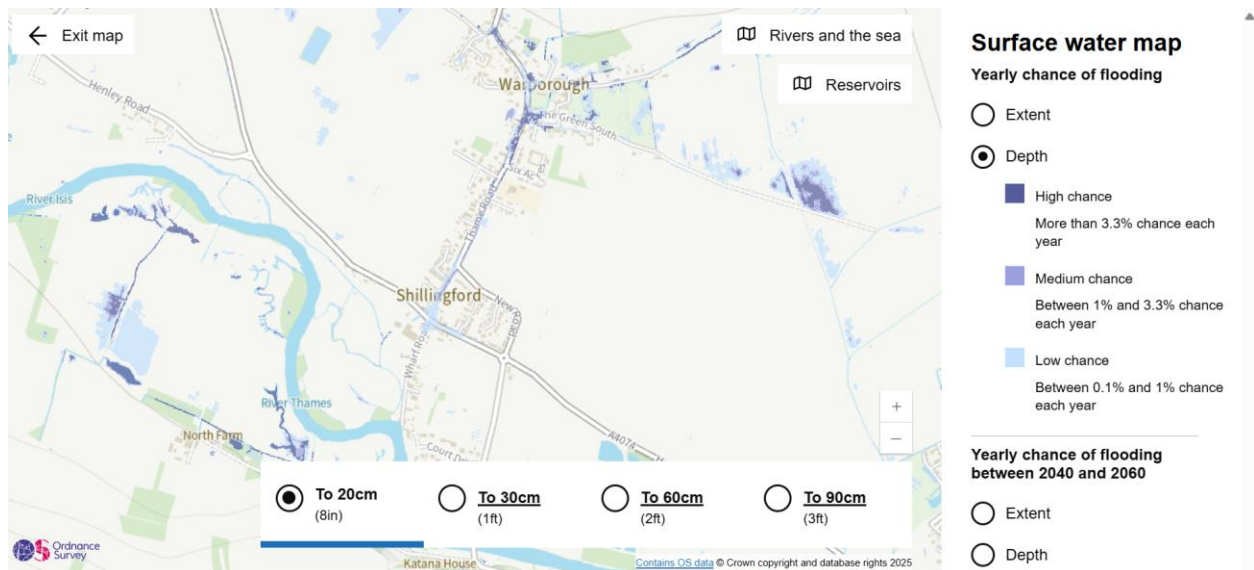
“In some cases, this is more extreme than the EA mapping for Fluvial and Surface Water”

- 4.5 However, Flood risk is assessed against the EA mapping service. These models are regularly updated and importantly calibrated to known flood events as part of the validation checking exercise. This statement therefore is misguided.

- 4.6 At the section: Flooding – Parish Catchment Area, it states:

“The East side of Warborough is a massive flood plain of +100 hectares...”

- 4.7 This is incorrect as the agricultural fields are defined as being in Flood Zone 1 and 2 and not the floodplain (Flood Zone 3). The floodplain is concentrated to the River Thames / Thame and not on the surrounding farmland.
- 4.8 Figure 34. Diagram of Flooding Issues within the Parish and Figure 35. Surface Water Flood Risk overlaid on geology (darker areas at higher risk) are now both inaccurate and are not based on the latest Surface Water Flood Risk mapping, which has been updated (as shown below), and there is also expected change in related Planning Practice Guidance in the near future.



Surface Water Flooding

- 4.9 Regarding surface water, Welbeck notes the following statement in the W&SNDP:

“Surface water flood risk is heightened by the village ditch system...Given the ditch system already floods when a flood event happens any additional water pushed into this ditch system by development of grassland /farm area which currently attenuates flood risk, will cause more severe flooding from the ditch system”

- 4.10 However, any new development under national guidance is required to adhere to national standards to restrict any surface water runoff to greenfield run off rates. This means that surface water is attenuated within any development proposal thus offering relief to the existing drainage system. Precisely the opposite of draft neighbourhood plan statement:

“Properties, driveways, gardens and roads within the parish experience fluvial, surface water and ground water flooding...”

- 4.11 The Parish council minutes – as noted above – confirm there are very few examples of surface water flooding. Groundwater flood risk is addressed below

Ground Water Flooding

- 4.12 The W&SNDP “Flood Policy Evidence” references RPS borehole test results to demonstrate a high degree of groundwater risk with ground water identified at 1.5m bgl. However, according to the South Oxfordshire Strategic Flood Risk Assessment, groundwater encountered at this depth is assessed to be low. Groundwater levels are at least 1.5m bgl and therefore not as shallow as the SFRA mapping.
- 4.13 The RPS reference to high groundwater is taken out of context. This refers to assessing the suitability of soakaways as part of a SuDS proposal and not in relation to an assessment of flood risk from groundwater. Welbeck agrees that Soakaways are not a suitable form of drainage in this location.
- 4.14 There is no evidence of groundwater emergence to the Site and recent additional testing in November 2024 also indicates that there is no evidence of groundwater emergence to this location. It is not possible for any development to ‘displace’ groundwater.

Fluvial

- 4.15 The Parish Council by its own admission accepts there are very few examples of flood events caused by river flooding. There is no acknowledgement in the W&SNDP or its supporting information that development can also alleviate flood risk.
- 4.16 Once again Welbeck highlights that the EA Flood Map for Planning is due to be updated in the summer of 2025, and this will be a material change to the development potential in the area.

5.0 TRANSPORT

- 5.1 Considering transport matters, which are identified as important to the local community in Warborough Parish, Welbeck (with its transport consultants Mode) has reviewed the key transport-related policies, which are:
- Policy H3: Active Travel
 - Policy H4: Parking Provision
- 5.2 Hereunder are presented some observations on each of these policies, as well as some general commentary on the document as a whole.

Policy H3: Active Travel

- 5.3 This policy supports new developments that are well-connected to key community facilities via sustainable and accessible pedestrian routes that align with the W&S Design Code. Reference is also made to the Parish Council’s traffic survey findings, and addressing any deficiencies related to new development demands.
- 5.4 In response to this policy Welbeck emphasises the off-site improvements that are proposed, as part of its development proposal. Welbeck has agreed with Oxfordshire County Council (OCC) that:

“...the principle of off-site improvement works to the local footways would provide the site with improved connectivity to local amenities and as such, would alleviate any connectivity concerns previously raised by OCC.”

Policy H4: Parking Provision

5.5 Welbeck notes that this policy defers to OCC policy for required parking provision for new developments. It also sets out a number of guidelines for parking at new developments, generally aligning with the previously mentioned Design Code.

5.6 A key point with which Welbeck is particularly concerned is:

“The introduction of significant numbers of motor vehicles which dominate the public realm”.

5.7 Welbeck highlights that its proposed development provides for on-site parking as well as several pedestrian links to the local highway network. As such, the development is not anticipated to cause significant impact in terms of on-street parking within the village. In terms of traffic impact, Welbeck has agreed with OCC that:

“Traffic impact assessment set out in the Transport Assessment of the proposed access and Shillingford Roundabout is agreed and does not result in a severe impact at these locations.”

General comments on transport matters

5.8 Welbeck also notes that there are concerns raised around vehicles speeding when exiting Warborough to the north. Whilst these are not directly relevant to its proposals, Welbeck has asked Mode to undertake analysis of its survey data, which shows that along New Road, there is a much lower proportion of speeding vehicles, and lower speeds overall.

5.9 At Appendix 9.13: Pedestrian Links Survey, the point at which Thame Road becomes New Road is identified as a key crossing point that is currently unsafe. However, as part of its proposed development scheme, Welbeck has included a proposed signalised crossing which should alleviate these concerns by providing a safe crossing point nearby. It is also noted that the refusal reasons for Welbeck’s recent planning application are directly quoted in the accompanying text in the W&SNDP regarding the lack of pedestrian connectivity. It should be noted that this was directly related to accessing the bus stops on the A4074 road, not other services which are of course very accessible by foot. However, and moreover, as is now agreed with OCC, off-site improvements have been agreed, and previous concerns have been nullified.

5.10 Overall, the key transport issues mentioned throughout the W&SNDP are parking, traffic, and pedestrian/cycle connectivity through the village. Welbeck is firmly of the view that these issues are covered extensively in potential development proposals, and its land can be developed without any transport harms, and with improvements to the general outlook in the parish.

6.0 THE EMERGING SOUTH & VALE LOCAL PLAN

6.1 The W&SNDP will need to be in conformity with the extant Local Plan at the time of its adoption, which we acknowledge is currently the South Oxfordshire Local Plan 2035. However, the South & Vale Councils Joint Local Plan is now at examination.

6.2 It is therefore important for the W&SNDP to accurately acknowledge that there is a new strategic plan in preparation and this the Parish Council appears to have done this on page 5. However, the timings of the Joint Local Plan remain unclear, and have the potential to be very drawn out not least because of the very serious issues with the Duty to Cooperate and housing requirements.

New National Planning Policy Framework

6.3 On the 12th of December 2024, the Government published an updated version of the National Planning Policy Framework (NPPF).

6.4 Paragraph 61 of the NPPF is clear:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.”

6.5 Associated with the revised NPPF, there is also a new approach to calculating housing needs. The output of this calculation suggests that the **minimum** housing needs in South Oxfordshire will increase from 579 dwellings per annum (dpa), to 1,242 dpa. Also, in the Vale of White Horse the figures increase from 633 dpa to 949 dpa. It is very likely then that the emerging Joint Local Plan will require further revisions, or a very early review mechanism, and ultimately more housing development sites in sustainable locations.

6.6 Warborough and Shillingford – combined, given how accessible the two places are to a range of services and facilities – is a sustainable location for development. It is very likely that additional development site can be accommodated in the parish, and the W&SNDP should engage with the opportunity.

6.7 There is a potential issue with the timing of this Neighbourhood Development Plan production and it should be aligned more closely to the likely revisions, and review of the emerging Joint Local Plan, in light of the new NPPF.

6.8 We would highlight that the Planning Practice Guidance (PPG) states:

“It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the document to become part of the development plan.”

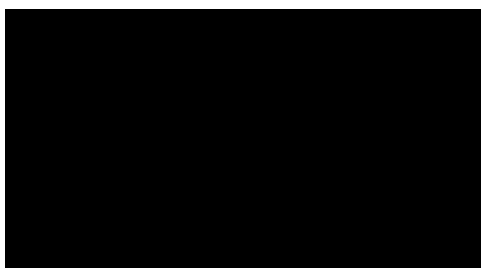
(Paragraph: 009 Reference ID: 41-009-20190509)

6.9 It follows that an emerging Neighbourhood Plan must not introduce unnecessary restrictive policies that could constrain the ability of a future district wide Local Plan to meet its objectives. Our particular concerns here are the Local Green Spaces that are being considered, and the unjustified approach to flooding matters. These matters ought to be a strategic decision, based on the needs of the district and a balance of those needs and meeting them in a sustainable way.

7.0 CONCLUSION

7.1 The revised Warborough & Shillingford Neighbourhood Development Plan is a missed opportunity to proactively consider the benefits of new development and meeting the social needs of new and prospective residents. It takes an unfortunately restrictive approach to landscape and local character and flooding assessments should be reviewed when the updated information from the Environment Agency becomes available for Drayton St Leonard, Newington and Shillingford.

Yours sincerely,



[Redacted line]

Partner

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PHOTOMONTAGES OF POTENTIAL DEVELOPMENT SCHEME ON LAND NORTH OF NEW ROAD



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Bedside hce gery dy Bheskpl D g rta n d m p y g r e h t a p p i n g s r e s t e r d a l l i t e a n d B l u e t e i e r M Q 0 0 9 8 8 0 (G o o g l e m a p s l i v e . c o m)



Site Boundary



Photomontage Location

date 31.10.24 drwn/chkd
JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

title scale
NTS
**PHOTOMONTAGE LOCATION
PLAN**

number rev
-

FIGURE A

FPCR | environment
& design



Photo Viewpoint 1 - View east from the corner of Thame Road and New Road



Visualisation Type: Type 1
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 09:56
Camera make & model, sensor format & lens:
Canon EOS 6D FF5, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 085° (bearing from North)
Location: 459605, 193029, 49.627m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 30m
Viewing distance: To be viewed at comfortable arm's length

date
09 08 2024

drwn/chkd
HT / JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

title
PHOTOVIEWPOINT 1 - EXISTING VIEW

number
FIGURE B

rev
B



Photo Viewpoint 1 - View east from the corner of Thame Road and New Road



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 09:56
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 085° (bearing from North)
Location: 459605, 193029, 49.627m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 30m
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	drwn/chkd
09 08 2024	HT / JPF
client	
Welbeck Strategic Land LLP	
project	
Land North of New Road, Shillingford	
title	
PHOTOVIEWPOINT 1 - PHOTOMONTAGE YEAR 0	
number	rev
FIGURE C	B



Photo Viewpoint 1 - View east from the corner of Thame Road and New Road



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 09:56
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 085° (bearing from North)
Location: 459605, 193029, 49.627m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 30m
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	drwn/chkd
09 08 2024	HT / JPF
client	
project	
title	
number	rev
FIGURE D	B



Photo Viewpoint 2 - View of the western site boundary on Thame Road



Visualisation Type: Type 1
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 10:05
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 155° (bearing from North)
Location: 459695, 193249, 49.513m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 10m
Viewing distance: To be viewed at comfortable arm's length

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t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

date
09 08 2024

drwn/chkd
HT / JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

title
PHOTOVIEWPOINT 2 - EXISTING VIEW

number
FIGURE E

rev
B

FPCR | environment
& design



Photo Viewpoint 2 - View of the western site boundary on Thame Road



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 10:05
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 155° (bearing from North)
Location: 459695, 193249, 49.513m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 10m
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	09 08 2024	drwn/chkd	HT / JPF
client	Welbeck Strategic Land LLP		
project	Land North of New Road, Shillingford		
title	PHOTOVIEWPOINT 2 - PHOTOMONTAGE YEAR 0		
number	FIGURE F	rev	B



Photo Viewpoint 2 - View of the western site boundary on Thame Road



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 10:05
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 155° (bearing from North)
Location: 459695, 193249, 49.513m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 10m
Viewing distance: To be viewed at comfortable arm's length

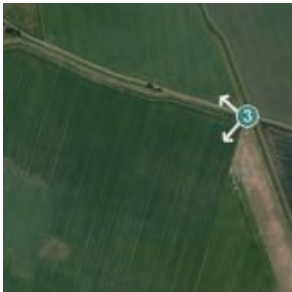
Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	drwn/chkd
09 08 2024	HT / JPF
client	
Welbeck Strategic Land LLP	
project	
Land North of New Road, Shillingford	
title	
PHOTOVIEWPOINT 2 - PHOTOMONTAGE YEAR 15	
number	rev
FIGURE G	B



Photo Viewpoint 3 - View west from the junction of Bridleway 392/16/10 and ProW 392/17/10



Visualisation Type: Type 1
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 10:37
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 260° (bearing from North)
Location: 460813, 193245, 50.323m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 950m
Viewing distance: To be viewed at comfortable arm's length

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t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

date 09 08 2024 drwn/chkd HT / JPF

client
Welbeck Strategic Land LLP
project
**Land North of New Road,
Shillingford**

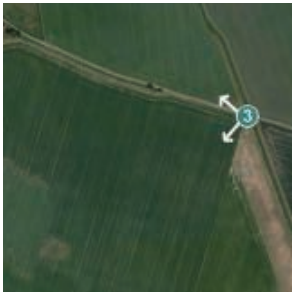
title
PHOTOVIEWPOINT 3 - EXISTING VIEW

number **FIGURE H** rev **B**

FPCR | environment
& design



Photo Viewpoint 3 - View west from the junction of Bridleway 392/16/10 and ProW 392/17/10



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 10:37
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 260° (bearing from North)
Location: 460813, 193245, 50.323m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 950m
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date
09 08 2024

drwn/chkd
HT / JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

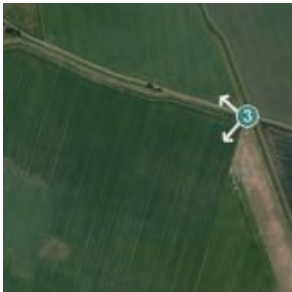
title
PHOTOVIEWPOINT 3 - PHOTOMONTAGE YEAR 0

number
FIGURE I

rev
B



Photo Viewpoint 3 - View west from the junction of Bridleway 392/16/10 and ProW 392/17/10



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 10:37
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 260° (bearing from North)
Location: 460813, 193245, 50.323m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 950m
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	09 08 2024	drawn/chkd	HT / JPF
client	Welbeck Strategic Land LLP		
project	Land North of New Road, Shillingford		
title	PHOTOVIEWPOINT 3 - PHOTOMONTAGE YEAR 15		
number	FIGURE J	rev	B



Photo Viewpoint 4 - View west towards the site from PRoW 392/17/10



Visualisation Type: Type 1
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 11:05
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 290° (bearing from North)
Location: 460980, 192648, 48.399m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 1.21km
Viewing distance: To be viewed at comfortable arm's length

date
09 08 2024

drwn/chkd
HT / JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

title
PHOTOVIEWPOINT 4 - EXISTING VIEW

number
FIGURE K

rev
B



Photo Viewpoint 4 - View west towards the site from PRoW 392/17/10



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 11:05
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 290° (bearing from North)
Location: 460980, 192648, 48.399m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 1.21km
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	09 08 2024	drwn/chkd	HT / JPF
client	Welbeck Strategic Land LLP		
project	Land North of New Road, Shillingford		
title	PHOTOVIEWPOINT 4 - PHOTOMONTAGE YEAR 0		
number	FIGURE L	rev	B



Photo Viewpoint 4 - View west towards the site from PRoW 392/17/10



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 11:05
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 290° (bearing from North)
Location: 460980, 192648, 48.399m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 1.21km
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date	drwn/chkd
09 08 2024	HT / JPF
client	
project	
title	
number	rev
Welbeck Strategic Land LLP	
Land North of New Road, Shillingford	
PHOTOVIEWPOINT 4 - PHOTOMONTAGE YEAR 15	
FIGURE M	B



Photo Viewpoint 5 - View north east towards the site from within North Wessex Downs AONB at the junction of Bridleway 141/14/40 and 141/36/10



Visualisation Type: Type 1
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 14:02
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 030° (bearing from North)
Location: 458890, 191541, 89.085m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 1.62km
Viewing distance: To be viewed at comfortable arm's length

date
09 08 2024

drwn/chkd
HT / JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

title
PHOTOVIEWPOINT 5 - EXISTING VIEW

number
FIGURE N

rev
B



Photo Viewpoint 5 - View north east towards the site from within North Wessex Downs AONB at the junction of Bridleway 141/14/40 and 141/36/10



Visualisation Type: Type 3
Projection: 'cylindrical'
Enlargement factor: 100% (when printed at A1)
Date: 18/03/24
Time: 14:02
Camera make & model, sensor format & lens:
Canon EOS 6D FFS, Canon 50mm Lens
Horizontal Field of View: 83°
Direction of View: 030° (bearing from North)
Location: 458890, 191541, 89.085m AOD (Eye Level)
Height of camera lens above ground: 1.6m
Distance to proposed building: 1.62km
Viewing distance: To be viewed at comfortable arm's length

Notes
Building FFL: Existing Levels
Building Height: range 9m to 10.5m
Source: DE_268 Land North of New Road REV G
Planting: Assumed up to 9m in height at year 15

Type 3 visualisations have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3.) Printing note: To give the correct viewing distance the sheet should be printed at A1. To be viewed at comfortable arms length.

date
09 08 2024

drwn/chkd
HT / JPF

client
Welbeck Strategic Land LLP

project
**Land North of New Road,
Shillingford**

title
PHOTOVIEWPOINT 5 - WIREFRAME

number
FIGURE 0

rev
B

Response 32

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation

Submitted on 2025-06-12 16:29:01

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Officer

Organisation (if relevant):

Natural England

Organisation representing (if relevant):

Natural England

Address line 1:

County Hall

Address line 2:

Spetchley Road

Address line 3:

Postal town:

Worcester

Post code:

WR5 2NP

Telephone number:

03000603900

Email:

consultations@naturalengland.org.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please find Natural England's response in relation to the above-mentioned consultation attached.

Kind regards,

[REDACTED]

Officer

Natural England

County Hall

Spetchley Road

Worcester

WR5 2NP

Tel 0300 0603900

We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

You can upload supporting evidence here:
511020 NE Response.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

☐

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

☐

Date: 10 June 2025
Our ref: 511020
Your ref: Warborough & Shillingford Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Neighbourhood Planning Team
South Oxfordshire District Council

BY EMAIL ONLY

planning.policy@southandvale.gov.uk

Dear Sir/Madam

Warborough & Shillingford Neighbourhood Plan - Review Regulation 16 Consultation

Thank you for your consultation on the above dated 28 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully


Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.localrecordscentres.org.uk/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

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

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

⁴ <http://magic.defra.gov.uk/>

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

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

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

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

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

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

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

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

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Response 33

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:33:15

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Senior Planning Policy Officer

Organisation (if relevant):

South Oxfordshire District Council

Organisation representing (if relevant):

South Oxfordshire District Council

Address line 1:

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Address line 2:

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Telephone number:

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Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

2025-06-11 SODC W&S reg 16 response.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.



Policy and Programmes

HEAD OF SERVICE: TIM ORUYE



Listening Learning Leading

Contact officer: [REDACTED]

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11 June 2025

**Warborough & Shillingford Neighbourhood Development Plan Review –
Comments under Regulation 16 of the Neighbourhood Planning (General)
Regulations 2012 (As Amended)**

South Oxfordshire District Council has worked to support Warborough Parish Council in the preparation of their neighbourhood plan review and compliments them on a very thoughtful, comprehensive and well produced plan review.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Warborough & Shillingford Neighbourhood Development Plan Review (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

We are committed to helping this plan review succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP review, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan review meets the basic conditions.

[REDACTED]
Senior Planning Policy Officer (Neighbourhood)

Ref.	Section/Policy	Comment/Recommendation
1	General Comment	A new version of the NPPF was released in December 2024. For neighbourhood plans, the policies in the 2024 Framework are to be applied to Plans which are submitted to the District Council under Regulation 15 after 12 March 2025. It is not clear which NPPF has been referred to throughout the plan. References throughout the Plan should be updated to reflect the correct Framework where relevant, including to specific quotes and page or paragraph numbers which may have changed. Where the NPPF is referenced we would recommend specifying the date of publication alongside.
2	General Comment	There are some maps within the plan and evidence base which do not have licensing information and some which appear to be screenshots from external websites. It is important that you to ensure you have the authority to include images of external sources within your Neighbourhood Plan otherwise such images should be removed. All maps should include full licensing and reference information to be retained.
3	Para 1.2.5	<p>The inclusion of wording from the JLP policy does not make it clear which tier is being referred to. For clarity we would recommend amending the text as follows, as well as provide context on the current development plan:</p> <p><i>“In the emerging Joint Local Plan 2041 (JLP), which is yet to be tested through examination, Warborough is classified as a Tier 4 settlement, and Shillingford (SW of A4074) as part of the countryside. In relation to Tier 4 settlements, tThe JLP states: “Within the built-up area of these settlements: development is limited to brownfield sites, replacement dwellings or subdivision.” In addition it states: ... “Development in the countryside will not be appropriate unless specifically supported by other relevant policies as set out in the development plan or national policy, or comprising a replacement dwelling consistent with its location in the countryside”. Both areas settlement tiers have no housing requirements.”</i></p>
4	Para 2.3.2	<p>The current Development Plan for South Oxfordshire includes the South Oxfordshire Local Plan 2035 and made Neighbourhood Plans (such as the WSNP). The South Oxfordshire Core Strategy and Local Plan 2011 are no longer part of the Development Plan for the district. To ensure factual accuracy, we recommend that the following is amended:</p> <p><i>“Currently the development plan in South Oxfordshire, which this RP also aligns with, includes consists of:</i></p> <ul style="list-style-type: none"> <i>• The Adopted LP 2035, and</i> <i>• made Neighbourhood Plans South Oxfordshire Core Strategy (2012), and</i> <i>• saved policies of the LP 2011 (2006).”</i>

Ref.	Section/Policy	Comment/Recommendation
5	Figure 3 National Landscapes and Green Belt	<p>This is an example of a map without referencing or licensing information included.</p> <p>In addition, the Green Belt area and National Landscape area are both shown using the same colour, which is confusing. We would recommend updating the map with the relevant licensing information and including a key/legend which sets out the Green Belt and National Landscapes using different colours.</p>
6	Para 5.1.22	<p>The subject of this paragraph is not clear. For clarity we would recommend specifying that it is referring to the status of the non-designated heritage assets:</p> <p><i>"The status of the NDHAs will be taken into account as a material consideration"</i></p>
7	Para 5.1.27	<p>The South Oxfordshire Local Plan 2035 Policy ENV6: Historic Environment follows the approach set out through the NPPF by which development which has an impact on heritage assets may be supported, so long as they adhere to a list of criteria. We also advise against using language such as "will not be supported" in the supporting text to avoid confusion as this reads as policy text. To ensure the wording in the supporting text of this policy does not read as policy text, and to better align the wording with that found in the Local Plan and NPPF, we recommend the following modifications:</p> <p><i>WPC supports the SODC approach set out in the South Oxfordshire Local Plan 2035 which states that "Proposals for new development should be sensitively designed and should not cause harm to the historic environment." where it can be demonstrated that the proposals will not cause physical or visual damage to a Heritage Asset or its setting. Throughout the parish, we have two conservation areas, listed buildings, a Special Character Area, and Heritage Assets both above and below ground. New development which has an impact on the identified heritage assets should look to conserve or enhance the significance of the heritage asset and settings. Any development causing physical damage to these will not be supported. To ensure support, the impact on the setting of such historic assets should be minimised or mitigated as much as possible.</i></p>
8	<p>Figures 10 and 11. Plan of Heritage in Warborough and Plan of Heritage in Shillingford</p> <p>also page 22 & 23 in Appendix 2:</p>	<p>It is not clear why some of the assets on the maps are numbered. In addition, it is difficult to ascertain which specific dot the number is referring to. Some are related to the Grade II Listed Buildings, some the Grade II* Listed Buildings and some the Potential Non Designated Heritage Assets.</p> <p>We would recommend separating out the numbered assets onto a different map(s), so that it is clear which dot is being highlighted. Furthermore some additional explanation as to why those assets have been identified should be included in</p>

Ref.	Section/Policy	Comment/Recommendation
	Landscape Character Assessment	<p>supporting text, otherwise we would suggest that the separate numbering is removed for clarity.</p> <p>There also seems to be two points labelled 13 in Figure 11. We would suggest that all the dots are checked and confirmed to reduce potential confusion and duplication.</p>
9	Policy VC1 – Village Character	<p>Regarding part b. we recommend greater clarity that Design and Access Statements are not required on all developments. In addition, this contains the only reference to the 'Parish Design Code' which could lead to confusion. We suggest amending the wording:</p> <p><i>“As appropriate to their scale, nature and location, development proposals should demonstrate within their Design and Access Statement, if required, or other submitted documentation, how they have regard to each relevant matter set out in the Parish Warborough & Shillingford Design Code (Appendix 1.0) and the District Council Joint Design Guide.”</i></p> <p>Paragraph c. of the Policy states that “Development proposals which harm the potential for the Parish to continue as a location for filming for television and film will not be supported.” The NPPF states at paragraph 16 that “Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.” The wording of this paragraph does not provide the clarity required by the NPPF and it is ambiguous how this should be applied in practice. We therefore recommend that this paragraph is deleted. If it is retained, we suggest it is positively prepared (as required by paragraph 16 of the NPPF) and identifies what a development proposal should do to be supported (for example, be in keeping with the historic character etc).</p> <p>New development is likely to result in an increase in parking demand and it would be overly onerous to expect new development not to do so as per part d and e. of the policy. The policy should be more positively worded to advise what development should do. At a minimum we recommend that this policy is more closely aligned to Policy H4 of the Plan which sets out that “Development should make adequate provision for parking in accordance with Oxfordshire County Council Standards” though other specific attributes could be identified (ie provide adequate provision for parking... in order to minimise on street parking, or proposals should encourage active travel to promote a reduction in car use):</p> <p><i>Any proposal which is likely to lead to an increased demand for parking which would adversely impact the street scene through car dominance</i> <i>Development proposals should</i></p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>ensure that provide adequate provision for parking in accordance with Policy H4 Parking Provision and with Oxfordshire County Council Standards, would not be supported.</i></p> <p><i>A loss of parking in front gardens, particularly around the village green, adjacent to green spaces or around those areas identified in Policy H4, would not be supported.</i></p> <p>Section g. of the policy refers to the section titled 'Shillingford Special Character' within the supporting text and Figure 11 to ascertain the characteristics of this area. The information referenced is a summary and a map of the heritage assets. For clarity, we would recommend that further detail is added, or section CA5 in the Character Appraisal evidence document is referenced within the policy as this contains the detail that would be required for a decision maker to make a judgement on this requirement.</p>
10	Para 5.1.35	This paragraph correctly refers initially to the 2024 South Oxfordshire and Vale of White Horse Landscape Character Assessment, but then lists character types from the previous 2017 South Oxfordshire LCA, although the map is from the 2024 LCA. This should refer only to landscape character areas 12C Eastern Middle Vale and 13C East Thames Lower Vale, and omit the reference to Flat Flood Plain Pasture, Flat Open Farmland, and Undulating Open Vale.
11	Figure 13	The boundary of the between LCA 12C and 13C through Warborough, as shown in Figure 13, isn't quite as shown on the landscape character map. This should be updated for accuracy. In addition, the text around the figure is not accurate and could be misleading, this should also be updated. For example; East Thames Lower Vale and Eastern Middle Vale are Landscape Character Areas, not landscape types. The key characteristics listed in Figure 13, under 13C East Thames Lower Vale and 12C Eastern Middle Vale are not from the 2024 LCA. In addition, it is not clear where the key landscape characteristics listed on the left hand side are from.
12	Para 5.1.37 & Table 1	The landscape recommendations do not appear to be based on the guidelines set out in the 2024 LCA, but partly on the 2017 LCA. We would recommend that these are updated in accordance with the latest guidance. In addition, references to planting ash trees should be omitted due to ash die-back disease.
13	Green Gap and the Setting and Gateway to the Settlements Para 5.1.38	Green Gaps do not hold the same function as Local Green Spaces and are intended to serve a different purpose. We have seen neighbourhood plans successfully incorporate Green Gaps where they are appropriate and justified to ensure any development which occurs within the boundary of the Green Gaps does not individually or cumulatively harm the open

Ref.	Section/Policy	Comment/Recommendation
		<p>character of the identified gap or result in the coalescence of two or more settlements. On this basis, we recommend the following modifications to this section to ensure the Plan is clear on the purpose of designating Green Gaps:</p> <p><i>“Many terms are used to refer to land between neighbouring settlements that are vulnerable to physical or visual coalescence, including ‘green gap’ as we have used here. The WSRNP prioritises these important spaces because of a Green Gap designation:</i></p> <ul style="list-style-type: none"> <i>• ensures new development occurring within them does not individually or cumulatively harm the open character of the identified gap allows for the preservation of open space within and between settlements; these gaps help to maintain green spaces within villages and built-up areas</i> <i>• protects against the sprawl and creep of development by requiring that new development does not result in the coalescence of separate settlements, helping to: By creating a physical barrier between settlements, local gaps can help to prevent urban sprawl and maintain a sense of place and individual identity between areas. Particularly where areas are very different historically as in the case here.</i> <p>Additionally, the identified Green Gaps may also provide the following benefits:</p> <ul style="list-style-type: none"> <i>• provides flood prevention: Green spaces can act as natural floodplains, absorbing excess water and reducing the risk of flooding. Even away from river flooding, there are many areas within the Parish where surface water and groundwater levels are high. Such open spaces allow for the containment of such water and prevent further damage to property</i> <i>• reduces noise, light and air pollution: Trees, hedgerows and other vegetation can help to mitigate noise, light and air pollution from nearby busy roads and nearby settlements</i> <i>• conserves biodiversity: Green gaps can provide important habitats for wildlife, supporting biodiversity and ecological connectivity. Even on arable fields, the presence of boundary trees and hedgerows is important, as is the opportunity to roam and forage among crops</i> <i>• provide visual amenity: Local gaps can enhance the visual appeal of an area, providing a sense of openness and reducing visual clutter.”</i>
14	Figure 14. Green Gaps and Land Use	The areas shown as ‘Important Gateway sites’ and ‘Important gap between settlement areas’ do not align correctly with the

Ref.	Section/Policy	Comment/Recommendation
		underlying base map. For accuracy this map should be updated to show the correct areas.
15	Green Gaps Paras 5.1.42 & 5.1.44	<p>As mentioned above, successfully implemented Green Gaps in made Neighbourhood Plans are framed to ensure that any development which occurs within the boundary of the Green Gaps does not individually or cumulatively harm the open character of the identified gap or result in the coalescence of two or more settlements. As such, we recommend the following modifications to the wording for the identified Green Gaps</p> <p>Paragraph 5.1.42: <i>“As the last remaining field between the two settlements, it is key that any development occurring within this Green Gap should not result in the coalescence of Warborough and Shillingford. this should not be developed to maintain the separate identities of the settlements, which are distinctly different.”</i></p> <p>Paragraph 5.1.42: <i>“The area around the roundabout has been urbanised with signage and other visual clutter. It is important that any development occurring within this Green Gap does not result in the further urbanisation of this area takes place. It is essential that the setting of the Shillingford Conservation Area is not eroded further.”</i></p>
16	Important Open Landscape Frontages Page 36 paras 5.1.46-5.1.49	<p>The text in this section suggests that the areas identified as Important Open Landscape Frontages on Figure 14 should be left “undeveloped” and that it is “important to maintain the rural approaches to the village and to ensure that further urbanisation through development or features that has currently taken place does not intrude further into the landscape”. When considering the expanse of the area covered and implication of the wording, this wording appears to be overly restrictive. We recommend that this section of the supporting text is amended to clarify that additional landscape mitigation might be needed for development in these locations, rather than placing a blanket restriction on all development:</p> <p>Paragraph 5.1.46: <i>“Some areas of the adjacent parishes have been subject to extensive development within recent years. Development in the following areas, as identified in Figure 14, should provide sufficient landscape mitigation to avoid The community envisage that if extended further and into the Parish itself without sufficient landscape mitigation, this could adversely impacting the rural nature of Warborough and Shillingford.∴</i></p> <p>Paragraph 5.1.47:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p><i>Warwick Spinney on the parish boundary is an important parish wildlife site, which is often overlooked. Where possible, landscape mitigation in this area should incorporate Maintaining an undeveloped buffer is particularly important in terms of wildlife corridors</i></p> <p><i>Paragraph 5.1.49: It is considered important to maintain the rural approaches to the village and to ensure that further urbanisation through development does not intrude further into the landscape.”</i></p> <p>Additionally, we recommend amending the supporting text to better align with the role of Neighbourhood Plans in guiding planning decisions:</p> <p><i>Paragraph 5.1.49: “This policy sets out the types of development that would be supported permitted in these important spaces.”</i></p>
17	Policy VC2 – Landscape and Green Gaps	<p>We recommend that this policy is reworded to set out that it should be applied on a proportionate basis to enable it to be applied effectively during the development management process, therefore ensuring the policy has the clarity required by the NPPF. This modification will ensure that the policy recognises that not all developments will need to adhere to the specifications of this policy due to their scale, nature, or location.</p> <p>As with our comments above, we recommend a modification to the section relating to Green Gaps to ensure that the policy recognises that Green Gaps do not have the same purpose as Local Green Spaces and are not intended as a blanket restriction on development within their identified areas but instead have been used to ensure any development which occurs within the boundary of the Green Gap does not individually or cumulatively harm the open character of the identified gap or result in the coalescence of two or more settlements. In addition, the plan will be read as a whole so to remove duplication we recommend removal of the final bullet point which refers to the Local Green Space.</p> <p>We also recommend a modification to criterion g in relation to our above comments on Important Open Landscape Frontages to better connect the policy to this section.</p> <p>We also recommend several small typographical and grammatical modifications:</p> <p>Development proposals as appropriate to their scale, location and nature, should demonstrate how they:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>e) Minimise adverse landscape impacts arising from development through sufficient landscape mitigation, including those sites on the edge of the parish that adversely impact upon the Plan Area,</p> <p>f) Provide an appropriate landscape buffer to identified biodiversity sites, including Warwick Spinney Parish Wildlife Site.</p> <p>g) Respect the gateway to the settlements as highlighted by sites 2 and 3, in addition to identified important open landscape frontage and open important river frontage shown in Figure 14 and incorporate sufficient landscape mitigation to avoid adversely impacting the rural nature of Warborough and Shillingford.</p> <p>h) As appropriate to their scale, nature and location, development proposals within Preserve the Green Gap site 1, known as Plough Field identified in Figure 14, should demonstrate how they to ensure that development would not:</p> <ul style="list-style-type: none"> • diminish the physical and/or visual separation of settlements • individually or cumulatively with other existing or proposed developments compromise the integrity of the gap; and • The site is designated is also designated as a Local Green Space, therefore where very special circumstances are demonstrated, the above criteria shall be applied.
18	Para 5.1.58	The list included within this paragraph is not directly from GLVIA3, so it should be clarified how the list of key criteria has been compiled.
19	Figures 18 - 20. Important Views	<p>Within Figure 18 there are purple lines which are not explained. For clarity and to ensure readability we would ask that the reason for these lines is added to the legend.</p> <p>Furthermore, it appears that not all of the views identified on the individual maps are included on the overview map on Figure 18 (for example S-V03). For completeness the overview map should incorporate all of the proposed views.</p> <p>It is noted that some of the view cones, such as W-V07 and W-V15 on Figure 20 appear to start beyond the boundary of the Neighbourhood Area and their view point is not included on the more detailed map. For clarity, we would recommend inset maps for those views to ensure they are within the neighbourhood plan area. As policies within a Neighbourhood Plan can only affect development within their designated Neighbourhood Area, if the views originate outside of the neighbourhood area, these views should be removed.</p> <p>In addition, within Figure 19 view cone S-V08 extends beyond the boundary of the Neighbourhood Area. We recommend these figures are modified so that these lines stop short of the Neighbourhood Area boundary.</p>

Ref.	Section/Policy	Comment/Recommendation
20	Policy VC3 – Local Views	<p>The views identified are far reaching with some overlap. We note that although appendix 15 sets out each of the views, it does not go into detail regarding the Landscape Institute guidance on how each of the views were assessed to be important, including visual quality, distinctiveness and cultural or historical significance. We recommend that this policy is reworded to set out that it should be applied on a proportionate basis to enable it to be applied effectively during the development management process, therefore ensuring the policy has the clarity required by the NPPF. This modification will ensure that the policy recognises that not all developments will need to adhere to the specifications of this policy due to their scale, nature, or location:</p> <p><i>“Development proposals as appropriate to their scale, location and nature, should maintain and where practicable enhance not significantly harm the following key views and vistas as shown in Figures 18 to 20 and in the table below”</i></p>
21	Figure 22. Dark Skies and Light Pollution, SODC Landscape Character Assessment 2024	<p>The figure is referenced incorrectly, it is an output from the Joint Local Plan 2041 Dark Skies/Light Impact Assessment Report produced by LUC and Hoare Lea for South Oxfordshire and Vale of White Horse. It is available as part of our online policy map. Or specifically it is Figure 4.2: Dark Skies and Light Pollution published within the policies map booklet, available at: https://www.southandvale.gov.uk/app/uploads/2024/12/CSD02.3-Emerging-Policies-Map-Booklet-Publication-Version.pdf</p> <p>The reference information should be updated so that it is factually correct.</p> <p>In addition, it would be useful for clarity for an outline of the settlements, or even a dot, to be included within the figure to provide reference as to where the settlements are located.</p>
22	Policy VC4 – Dark Night Skies	<p>The Lighting Professionals’ guidance does not form part of the development plan, as such the policy cannot require development to be compliant with it. We recommend an amendment to the policy wording so that development ‘has regard to the guidance’:</p> <p><i>“Development proposals should include sufficient information to demonstrate that they meet or exceed have had regard to the Institute of Lighting Professionals’ guidance...”</i></p> <p>The policy includes requirements which would be overly onerous to implement, whilst also including terms which are subjective and hard to objectively assess compliance with. We recommend that the policy is amended to be more positively prepared, focusing on what development should do, whilst focusing on the</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>hierarchy of avoidance and then mitigation as suggested in the supporting text:</p> <p><i>“All proposals for development should be designed to minimise light pollution, both external lighting and as a consequence of light leakage from the interior of buildings</i> Development proposals which include lighting should ensure that:</p> <p><i>a) Adverse effects from the installed lighting should be avoided where possible. b) If it is demonstrated that the above is not achievable, then adverse impacts are appropriately mitigated e.g. activated by sensors and turned off by timers.</i></p> <p><i>Development proposals will be supported if they:</i></p> <p>e) The measured and observed sky quality in the surrounding area is not reduced. <i>A) have been designed to minimise sky glow by the appropriate use of luminaires with zero upward light</i> d) Lighting is not unnecessarily visible in nearby designated areas and key habitats. <i>B) have been designed to minimise disturbance to wildlife, biodiversity and their food sources</i> e) The visibility of lighting from the surrounding landscape is avoided. <i>C) minimise visually detrimental impacts on their immediate or wider setting or to landscape character</i> f) D) Building designs should avoid <i>minimise large areas of glazing within the building design which would result in light spillage into rural and unlit areas.”</i></p>
23	Para 5.2.3	<p>Amendments to the second sentence of this paragraph have meant that it has lost its meaning and could confuse readers. For clarity we would recommend that the sentence is reworded:</p> <p><i>“There is a concern that there are significant numbers of new housing being delivered in close proximity to the parish (as shown below). While this offers considerable choice for potential new residents in the wider area-, gGiven the proximity; and the level of development nearby, anecdotally this has already has had an impact locally on roads, schools and healthcare services. as shown below”</i></p>
24	Para 5.2.4 This is particularly concerning given that in 2024 there were 715 hours of sewage discharge into the River Thame	<p>We note the concern and agree this is a serious issue. However to ensure the statement is factually correct, we would suggest including a reference to this data.</p>

Ref.	Section/Policy	Comment/Recommendation
25	Para 5.2.6	<p>This statement has tried to update the position to reflect the emerging JLP, however, it is referring to the position/strategy in the SODC Local Plan 2035. As the SODC Local Plan is the currently adopted plan we would recommend it focuses on the Local Plan strategy as below:</p> <p><i>"The JLP SODC Local Plan continues to endorse this spatial strategy while also seeking to allow 5-10% residual development to smaller villages through NPs if there is sufficient local benefit. The JLP continues to endorse residential development to smaller villages where local benefit is evidenced."</i></p>
26	Para 5.2.14	<p>We note that this paragraph appears to address both affordable housing and small/elderly housing interchangeably. For clarity, these are different issues which require differing approaches and policies. Policy H9 of the South Oxfordshire Local Plan sets out how affordable housing should be delivered across the district whilst Policy H11 addresses housing mix. We recommend that this paragraph is revisited to ensure that this distinction is clear</p>
27	Infill development/ definition paras 5.2.20 – 5.2.23	<p>We have concerns about the definition of infill within the Plan. The supporting text sets out how infill development should be considered in the context of Policy H2. Along with other criteria, the support text sets out that infill development in Warborough and Shillingford is identified as a site that is <i>"not considered backland (building in the rear garden of properties, which can require unsuitable access and reduce the privacy of adjoining properties)"</i>. This wording is more restrictive than that set out in Policy H16: Backland and Infill Development and Redevelopment of the South Oxfordshire Local Plan which allows for backland development in some circumstances. No clear justification is given as to why a more restrictive policy is required for Warborough and Shillingford than that set out in the Local Plan. We recommend this element of the supporting text is removed.</p>
28	Policy H3 – Active Travel	<p>We recommend that the phrase "in accordance with" is replaced with "having regard to" to align with the expectations set out in national policy regarding the use and application of design codes. This modification would make the policy consistent with national policy which states that 'significant weight should be given to development which reflects 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' (paragraph 139 of the National Planning Policy Framework). As the design code is included within part a, there is no need to duplicate this in part c. We also recommend minor modifications to the text for clarity:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>a) It is well connected with the existing network of pedestrian links in the neighbourhood area, in accordance with having regard to the principles of the Oxfordshire Street Design Guide, the District Council Joint Design Guide and Warborough and Shillingford Design Code</p> <p>b) It is a Arranged so that they take account of the existing local footpath network in their immediate locality; and</p> <p>c) have regard to the principles of the Warborough and Shillingford DC (Appendix 1.0);</p> <p>We support that the first paragraph of the policy is set in a proportional basis; however, we recommend that the section on cycle links is reworded so that it is also applied on a proportionate basis. This modification will ensure that the policy recognises that not all developments will need to adhere to the specifications of this policy due to their scale, nature, or location.</p> <p>f) Where relevant, it It contributes to improvements to existing cycling facilities. All new and improved cycle paths and facilities are required to be designed in accordance with have regards to the Oxfordshire Cycling Design Standards and LTN 1/20 or any subsequent updated guidance;</p> <p>The policy and supporting text reference the Parish Council's traffic survey, but it is not clear where this evidence can be found. The relevant appendix or evidence document should be referenced so the policy can be implemented. It is not included in Appendix 8: Transport & Traffic, and Appendix 14 states that the findings/recommendations of the traffic survey have not been released.</p>
29	Policy H4 – Parking Provision	<p>The policy should acknowledge that some of the changes set out in parts e), f) iii. and f) v. may not require planning permission. We recommend the inclusion of:</p> <p><i>“where planning permission is required”</i></p>
30	Figure 29 and Policy H5 - Safeguarding Affordable Housing	<p>Figure 29 is a replica of Figure 23. In order to remove duplication and improve readability of the plan, we would recommend moving policy H5 (and its relevant supporting text, minus Figure 29) up to sit with the other housing policies ie before the current policy H3 on active travel.</p>
31	Table 2: Community Facilities / Appendix 14 & para 5.3.10	<p>The list of facilities in Table 2 does not match those listed in Appendix 14 which might confuse readers. It is our understanding that the car park adjacent to the school has been created, whereas para 5.3.10 suggests it is still outstanding. We would recommend it is updated to take account of the latest information:</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>“Parking – a new 30 space car park adjacent to the school and improvements to the allotment and Green South parking areas have been completed. No changes have been made to The Greet Hall Parking arrangements.”</p> <p>It does not appear that there is a diagram mapping the community facilities which are to be protected. For clarity and to ensure that the policy can be implemented we would recommend all of the community facilities listed in Table 2 are mapped.</p>
32	para 5.3.12	<p>This paragraph usefully sets out how a developer could evidence how the asset or facility is no longer viable. However it should be intended as a guide otherwise it would be overly onerous and unimplementable. It is also not clear what ‘official confirmation’ might entail.</p> <p>We would recommend the following amendments:</p> <p>“Such information should could include:</p> <p>...</p> <p>ii. the report must also show official confirmation by the evidence from a marketing agent that the premises were appropriately and extensively marketed with no reasonable offer of sale or rent”</p>
33	Policy C1 – Community Infrastructure	<p>The second part of the policy only supports development proposals which result in the loss or significant harm to a community facility where it can be demonstrated that it is no longer viable. This is more restrictive than Policy CF1: Safeguarding Community Facilities of the South Oxfordshire Local Plan which also supports the above where it would result in the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities, or it has been determined that the community facility is no longer needed. No clear justification is given as to why a more restrictive policy is required for Warborough and Shillingford than that set out in the Local Plan.</p> <p>On the basis of the above, we recommend that this section of the policy is modified so that it is less restrictive:</p> <p>“Development proposals that will result in either the loss of, or significant harm to, a Community Facility as defined in Table 2: Community Facilities will be resisted not be supported unless:</p> <p>a) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient and with equivalent or improved facilities;</p> <p>b) it has been determined that the community facility is no longer needed; or</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>c) it can be demonstrated that the asset or facility is no longer viable. Sufficient information in this regard should be provided as set out in the supporting text above."</p> <p>The final paragraph of this policy currently lacks the clarity required by the NPPF. We recommend a series of modifications to ensure the policy is clear and unambiguous, and to recognise that it will be South Oxfordshire District Council who will determine the outcome of a planning application and not the Parish Council. We also recommend that this section of the policy is reworded to set out that it should be applied on a proportionate basis to enable it to be applied effectively during the development management process:</p> <p>"When considering the impact of new development and the arising infrastructure requirements, WPC will adopt the following infrastructure checklist. The development will be As appropriate to their scale, nature and location, development proposals are expected to:</p> <ul style="list-style-type: none"> i. Demonstrate that the existing community and other key infrastructure is sufficient or can be provided as part of the development; ii. Make provision for connection to high-speed broadband and/or other communication networks, with boxes for technology, services and utilities being carefully sited and masked wherever possible. New cables should be buried if possible; iii. Allow for the use of pushchairs, mobility scooters, etc; iv. Allow social integration in the villages where developments are to be open to the public; v. Show in the Design and Access Statement, if required, or other supporting information, how their design allows for adaptable dwellings responds to ensuring that buildings are adaptable over the lifetime of use, particularly given the high proportion of elderly residents and the Community Survey 2016 in which 75% cite elderly housing as highest priority for housing type; vi. Provide storage facilities for rubbish receptacles and cycles."
34	Policy C3 – Local Green Spaces	<p>We recommend a modification to the text of this policy so that it takes the matter-of-fact approach in the NPPF and so that it recognises and better aligns with the role of Neighbourhood Plans to guide planning decisions:</p> <p>"These spaces will be protected for the benefit of the community and development will not be permitted New development proposals will not be supported on land designated as Local Green Space except in very special circumstances"</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>We also have the following comments on a number of specific proposed new LGS:</p> <p>We consider that the current numbering scheme for the proposed Local Green Spaces is confusing and ambiguous. For example, proposed Local Green Space 4 in Warborough is separated into five distinct sections and Local Green Space 6 has multiple locations. We recommend that this is remedied so that each unique area has its own reference number. You may still wish to group similar LGS together, for example LGS 4 could be broken down into LGS 4a, LGS 4b, LGS 4c, etc.</p> <p>We also note that LGS04 in Shillingford overlaps with identified Green Gap 1. The Examiner for the Sutton Courtenay Neighbourhood Plan in Vale of White Horse commented the following on a similar issue: <i>“I am not satisfied that the two policies can operate effectively alongside each other on the same parcel of land. I have reached this conclusion for two reasons. The first is that the two policies perform different functions. The GG policy’s focus is on the separation of settlements. The local green space policy’s focus is on safeguarding green spaces in accordance with the principles in Section 8 of the NPPF. The second is that if parcels of land were designated both as a GG and as a local green space VWHDC would need to assess affected planning applications against two policies with different purposes. This will not bring the clarity required by the NPPF.”</i> Our Development management team also highlighted concerns about implementing two distinctive policies which overlap the same area.</p>
35	Policy E1 – Enhancement of Employment facilities	<p>The wording of this policy is a near repeat of the wording which was included in the Submission version of the Warborough and Shillingford Neighbourhood Plan. The Examiner for the Plan recommended the policy be modified stating the following:</p> <p><i>“The first part of the policy has regard to national policy and is in general conformity with the strategic policies in the development plan. I recommend two modifications. The first corrects the name of the organisation referenced in its third criterion. The second ensures that any such development has to comply with all of the three criteria.</i></p> <p><i>The second part of the policy seeks to apply the same criteria to proposals outside the built-up area. However, the policy tests are different in countryside locations. On this basis I recommend a modification so that this aspect of the policy takes on a more generalised format.”</i></p> <p>It is not clear why the policy wording has been reverted to its original wording and we recommend that this policy is modified in</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>line with the text recommended by the Examiner for the Warborough and Shillingford Neighbourhood Plan:</p> <p><i>“The development of new employment facilities within the built-up area of the village will be supported subject to the following criteria:</i></p> <ul style="list-style-type: none"> <i>i. the proposal respects the character and appearance of the immediate locality in terms of its height, scale, design and massing;</i> <i>ii. the proposal does not cause an unacceptable impact on the amenities of nearby residential properties; and</i> <i>iii. the proposal provides adequate parking, servicing and access arrangements in accordance with the most recently published standards of Oxfordshire County Council.</i> <p><i>Proposals located for new or extended business premises outside the built-up form areas of the village neighbourhood area will be supported where they meet the three criteria in this policy and where they respect the character of the area appropriate to a countryside in which location and they are located. Proposals for tourism, rural business and craft-related developments will also be supported where they meet otherwise consistent with other development plan policies.”</i></p>
36	Figures 39 and 40	<p>We recommend against using the words “Biodiversity Local Green Space” on these figures as Local Green Spaces refer to a specific designation. We recommend the use of “Local Biodiversity Area” instead to ensure the plan brings the clarity required by the NPPF.</p> <p>It is also unclear what the numbers 1-5 are referring to on Figure 40. This information should be added to the key for the map to ensure it has the clarity required by the NPPF.</p> <p>These figures and figures in other documents such as the Strategy for People and Nature in Warborough and Shillingford should be reviewed carefully to make sure that the identified areas are consistent across all figures/maps (e.g. the boundary of the Clay’s Orchard Local Wildlife Site are shown on only some maps in the documents - it needs to be updated on Fig. 7 of the Strategy also). Some additional Priority habitats (most notably ponds) could be incorporated in the requirements to protect existing and create new priority habitats.</p>
37	Policy ENV1 – Protecting and enhancing nature, and biodiversity net gain	<p>Overall, our ecology team commented that the current draft has been much improved from the regulation 14 version. ENV1 has been comprehensively re-written and the resulting policy wording is more coherent and concise than the previous draft. The Plan continues to interact well with local and national plans, avoiding excessive duplication while taking opportunities to push for more robust provision of enhancements and protection of locally significant green spaces and buffer strips than can be achieved</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>by such plans at larger scales. However there are still some outstanding points explored below.</p> <p>This policy would read better if named:</p> <p><i>“Protecting and enhancing nature, and achieving biodiversity net gain”</i></p> <p>Local Wildlife Sites are the green spaces of highest recognised value in the NP area and we would recommend specific reference to them within criterion i):</p> <p><i>“Ensure that existing wildlife habitats are safeguarded, retained and enhanced, particularly those identified as priority habitats, local wildlife sites as well as other forms of wildlife corridor or specific biodiversity areas”</i></p> <p>We recommend the word “native” is removed from criterion i) of the Wildlife Buffers and Enhancements section. With the impacts of climate change, species selection will need to become more diverse and robust to ensure the establishment of a future tree stock that is both climate and more disease resilient. To do this we need to move away from the ethos of retaining and planting just native trees. However, on some ecologically sensitive sites the planting of native trees and flora may still be preferable due to their associated wildlife habitats. However encouraging developments to employ non-native species in grassland creation is not likely to be appropriate, given that invasive non-native species already provide a significant threat to native biodiversity both globally and locally. We would therefore recommend the final sentence of criterion iii) is removed:</p> <p><i>“Enhancement or creation of grassland for native grassland flora and to provide habitat for invertebrates and small mammals in gardens and the wider countryside. Where appropriate, non-native species may also be introduced, but this would need to be justified based on their ecological value”</i></p>
38	Para 5.5.8: “The Environment Agency have accepted the hydraulic modelling report of Edenvale Young Associates Ltd which shows that where sites are in fluvial continuity	<p>We would recommend that flood levels should be assessed on a site by site basis. The 48.10m mentioned was taken as the flood level for a 1 in 1000 year flood event, adjacent to the application site at Plough Field. Whilst this gives an indicative flood level for this event, it is not appropriate to use as a blanket value for the whole of the parish. The flood levels may be lower or higher elsewhere in the village, depending on structures within the watercourses and local topography.</p> <p>We would not recommend applying a specific flood level limit for development across the whole parish. Modelling is continually</p>

Ref.	Section/Policy	Comment/Recommendation
	<p>with the Thames, ground levels below 48.1m Above Ordnance Datum (AOD) are at risk of fluvial flooding”</p> <p>And Policy ENV2 – Mitigating Flood Risk.</p> <p><i>“Development proposals for new housing should demonstrate that they achieve 100% surveyed, legal ground levels above 48.1m AOD.”</i></p>	<p>updated and improved, the flood level stated now, may change if/when a flood model is updated or local information/evidence demonstrates it is appropriate.</p> <p>Please note, 48.10m Above Ordnance Datum (AOD) has been taken as the flood level for a 1 in 1000 year flood event, which is in essence, the extent of Flood Zone 2.</p> <p>Housing, in accordance with NPPF Annex 3 is classed as more vulnerable development. Table 2 of the PPG (para 079 flood risk and coastal change) states that this type of development is suitable within flood zone 3; provided the sequential test and exception tests are passed, and is suitable within flood zone 2; provided that the sequential test is passed.</p> <p>NPPF Paragraph 175 states that <i>“the sequential test should be applied in areas known to be at risk of flooding now or in the future from any form of flooding, EXCEPT where a site specific FRA demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements would be located on an area at risk of flooding from any source.”</i> To require a site to have 100% of its levels above 48.10m would be in conflict with this paragraph. In addition, there needs to be a receptor for flood risk to become a hazard; for example if flood risk is reserved to a corner of the site, which is to be left as open space/no development, there could be no/limited impacts. This should be assessed on a case by case basis. In summary, the built form of the development should sit outside of areas at flood risk, but there is no requirement within national policy for the site to sit wholly outside of a flood zone. To require this, would be contrary to national policy.</p> <p>Furthermore, flood levels will fluctuate depending on the local topography. Land may sit lower than 48.10m, but unless it is in hydraulic connectivity to the flood plain it may not necessarily flood i.e there may be raised ground levels or natural barriers which prevent flood waters reaching this point. However, the residual risk of breach of any defences/land barriers should be assessed. If the land is below 48.10m, the applicant can, if the sequential test and exception test (as required) has been passed, raise ground levels, provided they have the necessary consents in place and can demonstrate a scheme of flood plain compensation on a level for level basis elsewhere. The Sequential and Exception tests should be applied prior to any mitigation works taking place, as this assessment cannot rely on mitigation measures that would require active maintenance, as their effectiveness in mitigating flood risk cannot be guaranteed.</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>In conclusion, we would recommend the deletion of the requirement that development proposals for new housing should demonstrate that they achieve 100% surveyed, legal ground levels above 48.1m AOD.”</p> <p>We recommend that policy ENV2 is reworded to set out that it should be applied on a proportionate basis to enable it to be applied effectively during the development management process, therefore ensuring the policy has the clarity required by the NPPF. This modification will ensure that the policy recognises that not all developments will need to adhere to the specifications of this policy due to their scale, nature, or location:</p> <p><i>“As appropriate to their scale, nature and location, development proposals should demonstrate that they will.”</i></p> <p>It is not appropriate to require developers to consult with Thames Water in criterion d of this policy as this may not always be required. Planning practice guidance encourages early engagement between local planning authorities and water/sewerage companies where water quality is likely to be a significant planning concern. Ultimately, the decision to grant or refuse a planning application rests with the District Council, who will take into account all relevant planning considerations and the advice from relevant consultees. In order to ensure the policy is not overly onerous, we recommend this criterion is deleted, alternatively the criterion could encourage developers to engage with Thames Water where appropriate.</p>
39	Figure 44. Flood Zones, Surface Water Flooding and topography	Regarding the Flood Zones on the map – the EA are currently reviewing the flood zones within the area. This plan is likely to change in the future. We recommend that a label is added directing the reader to the EA website as the information in the NDP represents a snapshot in time and the most up-to-date information will be held by the EA.
40	Para 5.5.39	The paragraph refers to the ‘JLP Climate Resilience Policies’ and then list DES9 and DES10. The JLP does have a comprehensive list of climate resilience policies, but is still undergoing examination. In addition, the policies specifically mentioned are those within the adopted South Oxfordshire Local Plan 2035. Furthermore DES9 is actually ‘Renewable and Low Carbon Energy’ with DES8 being the ‘Promoting Sustainable Design’ as suggested in the NDP. It is unclear if the plan is supposed to reference DES8 or 9 in this case. However, this paragraph should be amended so it contains accurate information and we would recommend focusing on the currently adopted local plan.
41	Para 5.5.42 and 5.5.43	It appears there are some spelling/grammatical errors in these paragraphs:

Ref.	Section/Policy	Comment/Recommendation
		<p>The second bullet of paragraph 5.5.42: <i>“Utilising renewable energy sources”</i></p> <p>Point ii. in the fifth bullet of paragraph 5.5.43: <i>“Maximising use of materials which score highly on Building for Life criteria 17 such as wood, wood and/or hemp fibre”</i></p>
42	Policy ENV3 - Climate resilience, renewable energy sources and energy reduction	<p>We recommend a number of modifications to this policy to ensure that it brings the clarity required by the NPPF and to align with the expectations set out in national policy regarding the use and application of design codes. This modification would make the policy consistent with national policy which states that ‘significant weight should be given to development which reflects 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’ (paragraph 139 of the National Planning Policy Framework. We also recommend a modification to the wording relating to the identified views to align it more closely with Policy VC3 and to ensure that it is not overly onerous:</p> <p><i>“Proposals for new housing or adaptations to existing properties which include measures to reduce energy consumption, and the adoption of renewable energy sources will be supported as highlighted in the Design Code will be supported”</i></p> <p><i>“Solar Arrays outside of the Green Belt will be supported on agricultural land of Grade 4 or below (in accordance with DEFRA’s ALC) as long as they do not significantly harm impact negatively on any Designated Views (Policy VC3) or Biodiversity habitats (Policy ENV1), do not increase the risk of flooding and do not conflict with have regard to the Warborough & Shillingford Design Code and District Council Joint Design Guide.”</i></p> <p>Regarding criterion c) we are not aware of any MOD sites/assets within the neighbourhood area. In addition, there is no mention of MOD sites or a map of assets within the supporting text to explain whether there is a particular issue related to this topic. We would recommend deletion of this criterion.</p>
Ref.	Section	Comment/Recommendation
43	Appendix 1: Design Code	<p>Our Urban Design team had the following comments:</p> <p>Overall, I am supportive of the neighbourhood plan and design code contained in Appendix 1.0. It is encouraging to see that sustainability objectives are at the core of the document and are</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>driving a some of the local policies. The diagrams and images contained with the Design Code are helpful in visually illustrating some of the aspects of the code which makes it stronger.</p> <ul style="list-style-type: none"> - There is an opportunity in Figure shown on page 17 when referring to off road parking, to add permeable paving. Adding a tree at the front of the garden would show how landscaping can help soften and complement built form. - In CODE WS.W02 (b), I would add buildings should have a positive interface with water courses or bodies (avoiding backing onto it). - The Joint Design Guide contains information on Parking and a link to the relevant section should be provided on Page 34 of the Design Code.
44	Appendix 2: Parish Character Appraisal	The points raised above in relation to para 5.1.35, Figure 13 and para 5.1.37/Table 1 of the neighbourhood plan; with respect to the landscape character assessments, key characteristics, landscape recommendations, are also relevant within the Character Appraisal appendix. References to the 2017 and 2024 landscape character studies are muddled. We would recommend the appendix is updated to refer only to the latest 2024 South Oxfordshire and Vale of White Horse Landscape Character assessment.
45	Appendix 2: Parish Character Appraisal Page 14/15	Photo viewpoints 9 and 10 as shown on page 15 have not been included on the photo location plan included on page 14.
46	Appendix 2: Parish Character Appraisal Key Elements Maps	The key for these maps lists that they identify important hedgerows, hedgerows with trees, boundary tree belt and tree cover. It appears that most if not all of the hedgerows and trees within the identified area are included. There does not appear to be a clear justification as to why all of these are important within the document. We recommend specific important hedgerows and trees are identified and justified, rather than placing a blanket restriction over all of them, as this will ensure the document is not overly onerous and can be applied more effectively.
47	Appendix 2: Parish Character Appraisal Issues and Opportunities	Some of the Issues and Opportunities identified for each of the Character Areas are quite far reaching and some parts are overly restrictive. For example, Issue and Opportunity 1 in each of the Character Areas sets out that ' <i>any development proposal requiring planning permission would need to avoid obscuring the identified views to the countryside</i> '. As this is an assessment, it is important that it is framed correctly by describing, analysing and making recommendations, not setting requirements. We recommend reviewing these sections to ensure that their contents are appropriate for inclusion within a Neighbourhood Plan and to remove any elements which are not. We recommend this is modified to be more in line with Policy VC3 where we

Ref.	Section/Policy	Comment/Recommendation
		suggest amendments so that it sets out that ' <i>Development proposals should not significantly harm the following key views.</i> '
48	Appendix 4: Strategy for People and Nature	Figure 14 has not been amended to reflect the change in direction from green gaps to gateways and should be updated. In a similar fashion to the plan itself, figures should be correctly referenced. For example figures 12, 26 and 34 etc do not cite their sources.
49	Appendix 4: Strategy for People and Nature Page 26 – Figure 24	This figure contains two labels stating “Inside the Green Belt” and “Outside the Green Belt”; however, it is unclear what specifically these are referring to. If the intention is that the Green Areas are within the Green Belt and the Blue/Purple Areas are outside the Green Belt, this could be better explained through the use of a colour coded key to ensure the document has the clarity required by the NPPF.
50	Appendix 4: Strategy for People and Nature 5.2.2. Current Green Corridors Page 30	The text on this page states “ <i>These corridors often coincide with Green Gaps and views, which are explored in the WSRNP Design Guide and Character Assessment</i> ” There does not appear to be a document called the “Design Guide and Character Assessment”, as such, we recommend this is modified to read either “Design Code” or “Character Appraisal”, depending on which document is the correct one to reference here.
51	Appendix 4: Strategy for People and Nature Page 31 – Figure 26	The key for this figure states that it shows areas within the built environment identified as LGS; however, these do not match the identified LGS within the Plan. We recommend that this figure is either updated to show the LGS as proposed in the Neighbourhood Plan itself, or that the figure is renamed to accurately reflect what it is showing.
52	Appendix 4: Strategy for People and Nature Opportunities and Recommendations	<p>For each of the Opportunities and Recommendations sections, we recommend the following modifications:</p> <p>These sections should recognise that it may not always be practical or achievable to maintain all trees/hedgerows/grassland. Instead, these sections should set out a sequential approach to mitigation as set out in Policy ENV1 of the Neighbourhood Plan; for example:</p> <p>“Avoid the unnecessary loss of mature trees, hedgerows, orchards or scrubland. Where the loss of any of these assets is unavoidable, development proposals should be assessed against the Mitigation Hierarchy as set out in the Local Plan and NPPF”</p>
53	Appendix 6: Flood Policy Evidence - Executive summary (page 2):	The SFRA has been updated since 2019. Latest guidance requires that SFRAs account for the impacts of climate change. The 2024 SFRA is available within the supporting documents for the new joint local plan available within the Climate and Environmental Quality section of the examination library:

Ref.	Section/Policy	Comment/Recommendation
	<p><i>"The concern is that flooding is happening before the predictions made for climate change have occurred. The South Oxfordshire Local Plan Strategic Flood Risk Assessment 2019 (SFRA) quotes 'Climate change is predicted to result in more frequent and extreme rainfall events, increasing the frequency and severity (depth/hazard) of flooding from fluvial and surface water sources'"</i></p>	<p>https://www.southandvale.gov.uk/joint-local-plan-2041-examination-library/</p> <p>To ensure accuracy the references to the SFRA within the evidence base and the plan itself should be updated to refer to the fact that the SFRA accounts for climate change. The quote within the executive summary of appendix 6 from the 2019 SFRA is not included within the 2024 SFRA, although it could be amended to the below from the 2024 report:</p> <p><i>'With climate change, the frequency, pattern and severity of flooding are expected to change and become more damaging.'</i></p>
54	<p>Appendix 6: Flood Policy Evidence. Page 7. Fluvial, Surface Water & Groundwater Flooding in the Parish:</p> <p><i>"Finally, Shillingford experiences fluvial flooding when the River Thames floods which has been modelled hydraulically to rise to 48.10m AOD in a 0.1% annual flood risk and travel up the Thame Road ditch as far north as the</i></p>	<p>The appendix does not include sufficient evidence regarding the deflection and its suggested effect on flooding. In order to ensure accuracy, we recommend the examiner asks the parish council to provide further evidence, or that the sentence is amended to read:</p> <p><i>"Finally, Shillingford experiences fluvial flooding when the River Thames floods which has been modelled to hydraulically to rise to 48.10m AOD in a 0.1% annual flood risk and travel up the Thame Road ditch as far north as the Greet Hall when deflected and there is no natural mitigation into the Village Flood Plain."</i></p>

Ref.	Section/Policy	Comment/Recommendation
	<i>Greet Hall when deflected and there is no natural mitigation into the Village Flood Plain."</i>	
55	Appendix 6: Flood Policy Evidence. unnumbered figures on Page 8 <i>Fluvial Flooding and Surface Water Flooding (Environment Agency)</i>	Please note that there have been national updates to the maps since November 2024. The surface water flooding map was updated in January 2025 and the fluvial flood risk map was updated in March 2025. To ensure accuracy the maps should be updated to reflect the latest available information.
56	Appendix 6: Flood Policy Evidence. Page 20 Fig 8. Illustrate Drainage and Catchment area that Warborough & Shillingford flood plain serves. We recommend there should be no development of Green Field sites in the area marked in blue.	As per comment on Policy ENV2, the statement that there should be no development of green field sites in the blue area, conflicts with national policy on flooding. If the application is accompanied by a Flood Risk Assessment which demonstrates that the site is not at risk of flooding from any source (with supporting evidence the LPA and statutory consultees are in agreement with) and the development won't increase flood risk as a result; there are no flood risk grounds for objection. We recommend that the map and the corresponding sentence that 'no development of green field sites in the area marked in blue' should be deleted.

Response 34

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:35:16

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

@oxfordshire.gov.uk

Organisation (if relevant):

Oxfordshire County Council

Organisation representing (if relevant):

Oxfordshire County Council

Address line 1:

County Hall

Address line 2:

New Road

Address line 3:

Postal town:

Oxford

Post code:

OX1 1ND

Telephone number:

Email:

@oxfordshire.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Planning Policy,

Please see attached Oxfordshire County Council's comments on the Warborough and Shillingford Neighbourhood Plan.

Many thanks,

Assistant Strategic Planner
Strategic Planning
Place Shaping Services

Email: @oxfordshire.gov.uk

Mob:

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You can upload supporting evidence here:
Oxfordshire County Council response.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

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

District: South Oxfordshire

Consultation: Warborough and Shillingford Revised (submission) Neighbourhood
Development Plan 2025-2041

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council welcomes the opportunity to comment on The Warborough and Shillingford Revised (submission) Neighbourhood Plan and supports the Parish Council's ambition to prepare a revision to the existing Neighbourhood Plan.

Officer's Name: [REDACTED]
Officer's Title: Assistant Strategic Planner
Date: 02 June 2025

ANNEX 1
OFFICER ADVICE

Team: Strategic Planning
Officer's Name: [REDACTED]
Officer's Title: Assistant Strategic Planning
Date: 02/06/2025

Strategic Planning Comments

Summary of OCC Comments

Strategic Planning

- The plan should demonstrate that it is substantially in accordance with the emerging South Oxfordshire and Vale of White Horse Joint Local Plan 2041 (JLP).

Transport Development Management and Transport Planning

- Transport policies should be compliant with the applicable Oxfordshire County Council Transport and Parking Standards.
- Policy H3: all references to the Parish Council's commissioned traffic survey should be removed.

General

We welcome the revisions that have been made to the Neighbourhood Plan following OCC's comments submitted in January 2025.

Whilst we welcome reference to the emerging South Oxfordshire and Vale Of White Horse Joint Local Plan 2041 (JLP), given that the JLP is now at examination OCC believes that the JLP should be referred to in the supporting text, and where relevant the text, of all policies to show that these policies are substantially in accordance with the JLP.

Policy ENV1

Whilst OCC appreciate and support the goals of ENV1 to support the delivery of 20% BNG. We still believe the wording is ambiguous and would recommend that the policy wording reflects that of the emerging South Oxfordshire and Vale of White Horse Joint Local Plan 2041 Policy NH2- Nature Recovery.

Additionally, Oxfordshire County Council still believes that the policy should clearly outline what evidence is required to demonstrate a 20% net gain in biodiversity.

Transport Comments

Page 30: Policy VC1 Village Character

The policy states:

'd. Any proposal which is likely to lead to an increased demand for parking which would adversely impact the street scene through car dominance would not be supported.'

e. A loss of parking in front gardens, particularly around the village green, adjacent to green spaces or around those areas identified in Policy H4, would not be supported.'

This shall be amended to:

'Proposals should provide cycle and vehicle parking in accordance with Oxfordshire County Council standards. Proposals shall be supported by adequate footway and cycleway links to access local amenities, and where possible, access to public transport routes.'

It would be difficult to assess a proposal on its likelihood for bringing an increased demand in parking / loss in parking around the wider neighbourhood area. Due to the impracticalities in assessing this, the text should be removed from the policy.

However, officers can assess if a proposal is supported by adequate footway/cycleway links and access to public transport. These links provide people the opportunity to choose active/sustainable modes of travel rather than travel by private vehicle. Amending the policy to the recommended wording would be in line with Oxfordshire County Council principles and allow officers to carry out an effective assessment.

Page 36: Policy VC2 – Landscape and Green Gaps

The policy states:

'a) Preserve or enhance the valued characteristics of the settlements and wider landscape setting as identified in the CA (Appendix 2.0) and have regard to relevant recommendations as set out in Table 1.'

The landscape benefits within Table 1 (page 32) are acknowledged. The Highway Authority have concerns with the suggestions within the Roads and Paths section. Often, due to highway safety and accessibility reasons, footpaths/footways are designed or redesigned to accommodate lighting, signage, widenings or resurfacing. This allows for the public to travel to destinations safely, accommodating those with

mobility issues or wheeled users. The poor (and lack of) footway/cycleway infrastructure within Shillingford and Warborough is highlighted within the Active Travel section (pages 55/56) of the Plan. It should be acknowledged that 'road improvements' are necessary to improve the accessibility of the area. The wording of Policy VC2 does not favour this.

In addition, roads and paths are often Public Highway. Land that is classified as public highway is covered by local highway authority obligations. We cannot accept any additional restrictions on land of this classification.

It is requested that suggestions made to Roads and Footpaths are **removed** from Table 1 – and subsequently the obligations under Policy VC2.

Page 54: Policy H2 – infill development

The policy states:

'Infill development within the built-up area of Warborough and Shillingford will be supported where it meets the identified infill definition above and accords with the Design Code in Appendix 9.1 and will: ...

- ii) provide secure vehicle access which does not impact highway safety, and provides vehicles with appropriate parking and turning arrangements; and*
- iii) Provide safe and secure access for cyclists and pedestrians; and'*

should be amended to:

'Infill development within the built-up area of Warborough and Shillingford will be supported where it meets the identified infill definition above and accords with the Design Code in Appendix 9.1 and will: ...

- ii) provide secure vehicle access **designed in accordance with the appropriate design safety standards and, as such,** which does not impact highway safety; and ~~provides vehicles with appropriate parking and turning arrangements;~~*
- iii) provide vehicle/cycle ~~with appropriate parking and turning arrangements~~ **in accordance with Oxfordshire County Council design and parking standards;** and*
- iv) Provide safe and secure access for cyclists and pedestrians; and'*

Page 57: Policy H3 Active Travel

Traffic Evidence section states:

'g) When preparing development proposals, developers should make reference to the Parish Council's commissioned traffic survey, or any subsequent or amended relevant evidence base document, and design their proposals accordingly.'

This section should be **removed** from the policy. When assessing proposals for new development, officers **cannot** take into account a traffic survey which has been provided by the neighbourhood plan. If a traffic survey is necessary for the assessment of the proposal **this will be provided by the developer** and accompany the planning application.

Page 64: Table 2

It is assumed that community facility m – ‘A4074 Cycle Path’ is intended to be a physically separated path for cyclists that is apart of the highway but segregated from motor vehicle traffic. It would be correct to use the phrase ‘*cycle track*’ instead. This should be corrected

A ‘cycle path’ is a route designated for cycling that is off the highway network.

Appendix 8: Transport and Traffic

A 2021 census survey is referenced to justify the conclusions made in this document - relating to vehicle ownership/usage. The 2021 survey data was undertaken in March 2021 at which time the government was progressing its ‘four-step roadmap’ back to ‘normal life’ following national lockdowns and the roll-out of Covid vaccines. The ‘stay at home’ rule was still in force until the end of March 2021. As such, only ‘key workers’ were able to travel for work, while many others were on furlough and working from home. Additionally, many people remained fearful of travelling even when permitted and travel abroad for pleasure was still prohibited. Therefore, the results of the 2021 census should be treated with a degree of caution.

Text should be included to acknowledge this.

Team: Minerals and Waste

Officer's Name: [REDACTED]

Officer's Title: Planning Officer

Minerals and Waste Comments

We welcome the reference to the Minerals and Waste Local Plan as part of the development plan and amendments to Policy VC3.

Annex 2
Member Views

Cllr's Name: [REDACTED]
Cllr's Ward: Benson and Crowmarsh

Councillor Comments

I think the revised version of the Warborough and Shillingford Neighbourhood Development Plan is a very well-structure document, and clearly states their views in a constructive fashion.

Response 35

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-12 16:39:17

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Senior Planner

Organisation (if relevant):

Squires Planning

Organisation representing (if relevant):

Julian Church & Associates

Address line 1:

The Long Barn

Address line 2:

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Postal town:

Crawley

Post code:

RH10 4HH

Telephone number:

[REDACTED]

Email:

[REDACTED]@squiresplanning.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam,

Please find attached a representation in relation to the Warborough and Shillingford Neighbourhood Plan Consultation.

If you have any queries in relation to this letter, please don't hesitate to contact us.

Kind regards,

[REDACTED]

Senior Planner | MPlan MRTPI

t: 01293 978 200

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e[REDACTED]@squiresplanning.co.uk
| w: www.squiresplanning.co.uk

a: Squires Planning, The Long Barn, Poplars Place, Turners Hill Road , Crawley , Sussex , RH10 4HH

You can upload supporting evidence here:

Squires Planning | Warborough and Shillingford Neighbourhood Plan Representation.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

WARBOROUGH PARISH COUNCIL171 THAMES ROAD
WARBOROUGH
WALLINGFORD
OX10 7DH

11 June 2025

Dear Sir/Madam,

RESPONSE TO WARBOROUGH AND SHILLINGFORD NEIGHBOURHOOD DEVELOPMENT PLAN 2025-2041 REGULATION 16 CONSULTATION

This response has been prepared on behalf of Julian Church & Associates in response to the Regulation 16 consultation on the Draft Warborough & Shillingford Neighbourhood Plan 2025-2041 (WSRNP). The representation comments on whether the WSRNP is in accordance with Schedule 4B of the Town and Country Planning Act 1990.

A representation was previously submitted on behalf of Julian Church & Associates in response to the Regulation 14 pre-submission consultation on the WSRNP. This representation seeks to provide further commentary on the previous representation.

Overview

The Warborough and Shillingford Neighbourhood Development Plan 2011-2033 (WSN2011) was 'made' in September 2019. This document is currently being reviewed through the WSRNP, which is currently undergoing a Regulation 16 consultation.

Alongside this, The South Oxfordshire Local Plan 2035 (SOLP) and the Vale of White Horse Local Plan 2031 (VWHLP) are in the process of being update/replaced with a new Joint Local Plan 2041 (JLP). The JLP has been put forward for examination by an independent Planning Inspector. If adopted, the JLP would replace the local plans of the two districts and would be used to determine planning applications in both districts. According to South Oxfordshire District Council's timetable, it is anticipated that the JLP will be adopted in late 2025.

The current National Planning Policy Framework (NPPF) was recently published on the 7th February 2025, and as discussed later in this representation, the WSRNP should be examined under the current version of the NPPF.

The WSLP proposes modifications to all policies in the Warborough and Shillingford Neighbourhood Plan 2033 and adds new policies including VC2, VC3 and VC4 under the Village character objectives, and policies ENV1, ENV2 and ENV3 under the environmental objectives.

Process

Paragraph 106 (reference ID: 41-106-20190509) sets out the three types of modification that can be made to a neighbourhood plan, and include minor (non-material) modifications, material modifications which do not change the nature of the plan, and material modifications which do change the nature of the plan.

The WSRNP seeks to introduce 6 new policies in the Plan which include designation and policy around Green Gaps and landscape impacts, important local views, dark night skies, biodiversity, flood risk and climate resilience. Other policies have undergone significant change, including:

- VC1 which provides stronger protection of non-designated heritage assets and introduces the Shillingford Special Character Area.
- H1 which now includes policy around independent elderly homes and small housing units.
- H2 (previously H3) which provides new criteria around links to community facilities, cycle paths, footpaths and traffic evidence.
- H4 (previously H5) which now provides many criteria for parking.
- C1 provides new criteria around infrastructure provision.
- C3 increases the number of Local Green Spaces from 4 to 11.
- E1 which now supports tourism, rural business and craft-related development.

It is also important to note that Policy H2 which covered the Six Acres residential extension allocation for around 29 dwellings has been removed as application P17/S0241/FUL was approved for the erection of the 29 dwellings.

The Material Modification Statement published with the Regulation 14 consultation stated that *'We therefore consider that the changes proposed constitute material modifications which do not change the nature of the NDP and would require examination but not a referendum'*. An updated Material Modification Statement has been published with this Regulation 16 consultation which assesses the recent updates to the WSRNP, concludes that *'The changes proposed do not change the nature of the neighbourhood plan... We therefore consider that the changes proposed constitute material modifications which do not change the nature of the NDP and would require examination but not referendum'*.

We disagree with this as 6 new policies have been introduced which would have a significant impact on development, particularly VC2 which designates Green Gaps and VC3 which identifies 36 Local Views which development would be required to maintain and enhance. Development would be heavily restricted within these Green Gaps and if affecting Local Views where previously these were not considerations. The amendments to Policy C3 will also provide significant constraints for 7 sites that were not previously considered suitable for designation as Local Green Spaces.

The updated plan does not include any new site allocations which significantly detracts from the ability of Warborough and Shillingford to contribute to South Oxfordshire and Vale of White Horse's local housing requirements. This is further emphasised by the changes to the standard methodology of the December 2024 NPPF which has increased the total joint need between South Oxfordshire and Vale of White Horse from 24,240 to 42,320 homes.

Whilst the scope of modifications is subjective, it is evident that the removal of a site allocation, the addition of 6 new policies and major amendments to existing policies which would materially impact the locations which development might be supported, would result in material modifications which significantly affect the nature of the plan. As such, Regulation 14 and 16 consultations, examination and referendum are required to avoid any legal challenges.

The Basic Conditions

To proceed to referendum and be legally compliant, the Neighborhood Plan must meet the Basic Conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. These are:

-
- (a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*
 - (b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
 - (c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
 - (d) *the making of the order contributes to the achievement of sustainable development,*
 - (e) *the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
 - (f) *the making of the order does not breach, and is otherwise compatible with, assimilated obligations, and*
 - (g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

This representation highlights several conflicts between the WSRNP and the Basic Conditions which are discussed below. Because of these conflicts, the WSRNP does not meet the Basic Conditions and cannot proceed to referendum.

National Policy and Guidance

A new version of the NPPF was published on the 7th February 2025. The transitional arrangements for the preparation of neighbourhood plans are set out in paragraph 239 of the NPPF.

‘For neighbourhood plans, the policies in this Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025’.

On the Warborough Parish Council’s website, it states that the WSRNP was submitted to South Oxfordshire District Council on the 19th March 2025, importantly after the 12th March 2025. This means that the WSRNP will need to be progressed in line with the current version of the NPPF dated the 7th February 2025 in order to comply with Basic Condition (a) which requires the plan to have regard to national policies and advice contained in guidance issued by the Secretary of State.

In this case, the Basic Conditions Statement (dated March 2025) states that the WSRNP has been prepared with regard to national policies as set out in the revised NPPF dated December 2024. It has therefore not been prepared with regard to national policies set out in the current version of the NPPF dated February 2025, and therefore fails to comply with paragraph 239 of the NPPF or Basic Condition (a).

Development Plan

The WSRNP is being prepared on the basis that the key strategic policies are contained in the SOLP. South Oxfordshire and Vale of White Horse district councils are working together on a JLP which was submitted for examination on the 9th December 2024 and is set to be adopted late in 2025. Should the WSRNP progress as drafted and the JLP be adopted in advance of the WSRNP, it would likely fail to be *“in general conformity with the strategic policies contained in the development plan”*.

To avoid this, as suggested in our previous representation, we suggest progression of the WSRNP is paused and resumed once the JLP is in place. This will provide a sound and stable development plan within which a robust neighbourhood plan can be prepared that can stand the test of time.

Commentary on the WSRNP

The WSRNP includes a range of policies which have been assessed against the current and upcoming Local Plan and current version of the NPPF dated February 2025. The policies and strategies listed below have been assessed against the Town and Country Planning Act 1990. Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 sets out conditions that need to be met when submitting a draft neighbourhood plan.

Policy VC1 – Village Character

The Neighbourhood Plan details the importance of preserving heritage assets and their proximity to a conservation area. Policy VC1 requires development to respond positively to the relevant identified Character Area details, relevant issue and opportunities as set out in the Character Appraisal. Character Area 6 relates to the Shillingford Bridge Approach and paragraph 12 of the Issues and Opportunities set out in the Character Appraisal states that:

“The other focal point is the area around Ferry House, Bridge House and The Mews, all adjacent to the Bridge. Although it is not part of the Conservation Area, it has many qualities, cultural and historic associations which should be preserved and enhanced”.

In our previous consultation, we highlighted that Ferry House has been reviewed by Donald Insall Associates, Heritage Consultants, who have identified that Ferry House is not of special interest, of unremarkable design quality and only makes a modest contribution to the setting of the nearby listed buildings. As a result, it does not have sufficient significance to be eligible for inclusion on the Historic England National Heritage List.

Moreover, Shillingford Bridge and Bridge House have existed for several hundreds of years without Ferry House being there. Ferry House does not hold the same level of historical significance as Bridge House and The Mews and does not contain, as stated in the Issues and Opportunities supporting text above, ‘many’ qualities, cultural and historic associations that should be preserved and enhanced, to the same level of Bridge House and The Mews. This is reinforced by the WSRNP which confirms that Ferry House is not of sufficient historical interest to be a non-designated heritage asset. We therefore request that Ferry House is removed from paragraph 12 for the Issues and Opportunities of Character Area 6 set out in the Character Appraisal.

Regarding non-designated heritage assets, Policy VC1 states that:

“The Plan identifies a series of non-designated heritage assets for Warborough and Shillingford – see Appendix 5.0 Table. Development proposals affecting an identified non-designated heritage asset should demonstrate how the proposal will preserve or enhance the significance of the asset. Where a proposal would directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset..”

The policy explicitly requires development affecting a non-designated heritage asset to preserve or enhance the significance of the asset. This is in direct conflict with paragraph 209 of the NPPF dated February 2025 which states:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect

non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”

As a result, Policy VC1 and the WSRNP does not have regard to national policies and advice and fails to meet condition (a).

Policy VC1 does not need to replicate national policy, and we therefore recommend that the following text be deleted from the policy:

~~*“Development proposals affecting an identified non-designated heritage asset should demonstrate how the proposal will preserve or enhance the significance of the asset. Where a proposal would demonstrably harm a non-designated heritage asset, the damage caused to the identity and character of the asset will be weighed against the overall benefits that would arise from the proposed development.”*~~

If the Relevant Authority wish to state something in its place, then we suggest you duplicate national policy and state *“Development that has an effect on a non-designated heritage asset should have regard for national policy.”*

Policy VC2 – Landscape and Green Gaps

Policy VC2 relates to landscape and green gaps. There are two criteria of Policy VC2 that we would like to discuss.

Firstly, criterion (e) seeks to *‘Minimise the impact of disruptive uses or major development on the landscape’*. The use of the term *‘disruptive use’* is vague and undefined, and therefore subjective open to interpretation. It is not a term that is used anywhere in the NPPF or the SOLP. As a result, Policy VC2 does not have regard for national policies or advice and fails to meet condition (a) of the Basic Conditions.

Secondly, criterion (g) requires development to *‘Respect the gateway to the settlements as highlighted by sites 2 and 3, in addition to identified important open landscape frontage and open important river frontage shown in Figure 14’*. Whilst it is clear where these frontages are situated, it is not clear how development is expected to respect them. Taking the open important river frontage, the description provided in the support text is that:

“This is an area alongside the Thames which has a unique waterside frontage. The views of the expansive River Thames are enhanced by its relatively undeveloped nature. Whilst there are some pockets of development outside of the Parish, this remains largely a clear and unobstructed area. It is enjoyed by walkers along the long-distance Thames Path and from the key vantage point on the listed landmark Shillingford Bridge. There is an overwhelming sense of tranquillity in this area, set within a key landscape environment that warrants future protection from adverse impacts.”

Whilst this provides a brief description of the landscape character, it does not provide detail on what aspects of the landscape require protection and how development can successfully protect it. The stretch of river is characterised by human interventions relating to the use of the river over time (such as the tow path) and a more recent leisure uses. This is evident by considerable stretches of hard reinforced bank to support moorings and other structures such as boat houses. It is not clear what *“adverse impacts”* are alluded to, but we would hope the plan does not wish to stifle the continued evolution of the watercourse to meet the changing demands of those who use it. Greater clarity on the meaning of *“Respect the... identified important open landscape frontage and open important river frontage shown”* is needed as the wording is ambiguous.

Policy H2 – Infill Development

Policy H2, in part, requires infill development to meet an identified infill definition set out in the supporting text. The supporting text states that:

'In the case of Warborough and Shillingford, infill development is identified as a site that is:

- between two buildings and capable of accommodating one or two houses*
- not an important open space or feature that adds to the character of the area (as identified in the Character Appraisal)*
- visually linked in the sense that infill does not detract from the existing frontage, and*
- not considered backland (building in the rear garden or properties, which can require unsuitable access and reduce the privacy or adjoining properties)'*

The NPPF does not provide a definition for infill development which we believe is due to the fact that the acceptability of the location of infill development can vary greatly and so should be determined on a case-by-case basis. The SOLP does provide a definition which is less restrictive than the one above.

Policy H2 would therefore fail to be in general conformity with the strategic policies contained in the development plan. The development plan provides a strategy for new homes, which includes windfall units intended to come forward through planning applications, much of which would be infill development. The number of windfall units in the plan is informed by the current infill definition set out in the SOLP. By seeking to enforce a more restrictive definition the plan is in effect limiting the ability of the area to meet the strategic housing figure set out in the Development Plan. Such a measure would restrict development and conflicts with the social objective for sustainable development set out in paragraph 8 which seeks to *'support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'*. And therefore condition (d).

Policy H2 should be amended to support development within the built-up area of Warborough and Shillingford.

Approach to Residential Development

The adopted WSNP includes a number of policies to support residential development. This included the site allocation in Policy H2 and infill development in Policy H3. The WSRNP has removed the site allocation as permission has been granted for the development and as we have seen, the requirements for Policy H2 are much stricter than in the adopted plan.

These changes are negative for the direction of the WSRNP and make it more difficult to gain permission for any new dwelling in the parish. The changes to the standard methodology which have come forward with the NPPF has increased the total joint need between South Oxfordshire and Vale of White Horse from 24,240 to 42,320 homes. This places an even greater need for neighbourhood plans to actively encourage development, however in this case the WSRNP opposes it.

The overall approach to residential development therefore conflicts with the social objective for sustainable development which is *'to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'*. The approach to housing therefore does not contribute to achieving sustainable development and conflicts with condition (d).

Absent Policies

One area that the WSRNP doesn't cover is replacement dwellings. This is an important matter given that a reasonable percentage of the parish is situated within flood zones 2 and 3 and therefore at risk of flooding. Residents who own a property that is at risk of flooding may wish to apply for a replacement dwelling to relocate their home to a part of the residential curtilage that is at a lower risk of flooding to avoid potential damage and risk to health. This could be done whilst avoiding any adverse impacts on the character of the area, landscape and where appropriate listed buildings and the conservation area. The addition of such a

policy would be beneficial for the community and would comply with the basic conditions. We request that such a policy is included within to the plan.

Summary & Conclusion

This representation has been prepared in response to the WSRNP which is currently undergoing a Regulation 16 consultation. The Neighbourhood Plan is being updated alongside the JLP which was submitted to the Secretary of State for Examination on the 9th December 2024.

We believe that the changes to the WSRNP constitute material modifications that affect the nature of the plan due to the removal of the site allocation, significant changes to existing policies and inclusion of new policies which heavily restrict development. The Basic Conditions Statement states that the plan has regard for policies contained in the NPPF dated December 2024, and not the current version of the NPPF dated February 2025. The plan does not include policies that encourage residential development and overall, the WSRNP does very little to contribute to South Oxfordshire and Vale of White Horse's housing need, which has been exacerbated by the changes to the standard methodology for housing requirement that have come forward with the NPPF and have significantly increased the joint requirement.

There is a risk that the WSRNP will be made before the JLP is adopted and as such, there is a risk that some of the policies will become out-of-date and will not reflect the needs of the community. We therefore ask that the preparation of the WSRNP is halted so that it can come forward in conformity with the JLP.

This representation has considered the WSRNP against the basic conditions and highlighted where it fails to meet them. In particular, it fails to meet basic conditions (a), (d) and (e) as set out in Schedule 4B of the Town and Country Planning Act 1990. Until these matters have been addressed, the plan should not progress to examination and referendum/adoption.

If you have any queries in relation to anything stated in this representation, please do not hesitate to contact me.

Yours sincerely,

[Redacted Signature]

[Redacted]
Managing Director | MPlan (Hons) MRTPI
[Redacted]@squiresplanning.co.uk

The following responses were received after the publicity period ended

Response 36

Submitted to Warborough and Shillingford NDP Review: Regulation 16 Consultation
Submitted on 2025-06-24 16:28:54

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

[REDACTED]

Name:

Brian Harding

Job title (if relevant):

-

Organisation (if relevant):

-

Organisation representing (if relevant):

-

Address line 1:

[REDACTED]

Address line 2:

[REDACTED]

Address line 3:

[REDACTED]

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

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

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Warborough and Shillingford Neighbourhood Plan Review consultation? Please tick all that apply.
