

# **Warborough and Shillingford Neighbourhood Development Plan Review 2025-2041**

**A report to South Oxfordshire District Council on  
the Warborough and Shillingford Neighbourhood  
Development Plan Review**

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## **Executive Summary**

- 1 I was appointed by South Oxfordshire District Council in June 2025 to carry out the independent examination of the review of the Warborough and Shillingford Neighbourhood Development Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 25 July 2025
- 3 The Plan is an excellent example of a neighbourhood plan review. It seeks to bring the Plan up-to-date and responds to the adoption of the South Oxfordshire Local Plan. It includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It consolidates existing policies on design, village character, and local green spaces.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Warborough and Shillingford Neighbourhood Development Plan Review meets all the necessary legal requirements and should proceed to referendum.
6. I recommend that the referendum coincides with the neighbourhood area.

**Andrew Ashcroft**  
**Independent Examiner**  
**26 November 2025**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Warborough and Shillingford Neighbourhood Development Plan Review 2025-2041 ('the Plan').
- 1.2 The Plan was submitted to South Oxfordshire District Council (SODC) by Warborough Parish Council (WPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan (and a review of a plan) can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and setting in the wider landscape. It consolidates existing policies in the Plan on design, village character, and local green spaces.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by SODC, with the consent of WPC, to conduct the examination of the Plan and to prepare this report. I am independent of both SODC and WPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

### *Examination Outcomes*

- 2.4 The examination process for the review of a 'made' neighbourhood plan is set out in Section 3 of this report.
- 2.5 The outcome of the examination is set out in Section 8 of this report

### *Other examination matters*

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
  - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

### 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- The sixteen appendices
- the Basic Conditions Statement.
- the Consultation Statement.
- the SODC SEA/HRA screening report.
- the WPC Modification Statement.
- the SODC Statement of Significance
- the representations made to the Plan.
- WPC's responses to the clarification note.
- the adopted South Oxfordshire Local Plan (2011-2035).
- the submitted Joint Local Plan
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 25 July 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the professional way in which the Plan has been developed.

#### *The examination process for the review of a neighbourhood plan*

3.4 The Neighbourhood Planning Act 2017 identifies the circumstances that might arise as and when qualifying bodies seek to review 'made' neighbourhood plans and introduces a proportionate process to do so based on the changes proposed.

3.5 There are three types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves and as follows:

- minor (non-material) modifications to a neighbourhood plan or order which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum; or
- material modifications which do not change the nature of the plan or order and which would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of

the independent examiner, are not so significant or substantial as to change the nature of the plan; or

- material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

- 3.6 The Modification Statement comments that the modifications to the policies constitute a minor material amendment to the Plan which require examination but not a referendum.
- 3.7 I have considered this matter very carefully. I have concluded that the significance or substance of the modifications proposed to the Plan by WPC is such that both an examination and a referendum are required. In this context, I consider that the proposed modifications are so significant as to change the nature of the Plan. I have reached this decision for three reasons. The first is that Policy C3 of the Plan proposes the designation of additional Local Green Spaces. Such designations would have an important effect on the use of the parcel of land concerned within the Plan period. The second is that Policy VC2 of the Plan proposes two gateway sites and a Green Gap. The third is the cumulative effect of the modifications to other policies in the Plan.
- 3.8 WPC acknowledged this conclusion and agreed that the examination of the Plan should proceed on this basis.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), WPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is a good example of a Statement of this type. It sets out key findings in a concise report which is underpinned with a series of more detailed tables and appendices.
- 4.3 Section 3 comments about the general approach to consultation Section 4 provides details about the consultation activities that took place to engage the local community. They are summarised in Appendix 5.2. The Statement also provides specific details about the consultation processes that took place on the pre-submission version of the Plan (November 2024 to January 2025).
- 4.4 Appendix 5.5 of the Statement provide details about how the Plan was refined because of this process. This helps to explain the way in which the Plan has evolved.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. SODC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

### *Consultation Responses*

- 4.6 Consultation on the submitted plan was undertaken by SODC. It ended on 11 June 2025. This exercise generated representations from the following organisations:
  - Rectory Homes
  - Thames Water
  - Historic England
  - National Gas
  - Welbeck Strategic Land
  - South Oxfordshire District Council
  - Natural England
  - Oxfordshire County Council
  - Julian Church and Associates

- 4.6 Twenty-seven additional representations were received which supported the Plan.
- Warborough and Shillingford Neighbourhood Development Plan Review – Examiner's Report

- 4.7 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, this report refers to representations on a policy-by-policy basis.



## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area is the parish of Warborough. It consists of the village of Warborough and the hamlet of Shillingford. The largely separate built-up areas of Warborough and Shillingford sit respectively to the north and both to the north and to the south of the A4074. The River Thames forms the southern boundary of the neighbourhood area. Outside the two main settlements the neighbourhood area is mainly comprised of pleasant rolling countryside to the north and the south and the flat River Thames valley to the east and west. There were 466 dwellings in the neighbourhood area in 2021. It was designated as a neighbourhood area on 1 March 2016.
- 5.2 The neighbourhood area is mainly in agricultural use and sits within a rich landscape and ecological setting dominated by the River Thames. Both settlements have their own long-standing conservation areas.
- 5.3 Warborough is largely linear in its format based on its position on Thame Road. As the Plan describes the core of the settlement is based on the square of land formed by St Laurence's Church, The Green North, The Green South, and The Green itself. There are a series of attractive historic buildings based around The Green North and South. Shillingford straddles the A4074. The older part is primarily to the south of this road and is based around Wharf Road which leads down to Shillingford Wharf.

### *Development Plan Context*

- 5.4 The South Oxfordshire Local Plan was adopted in December 2020. It sets out the basis for future development in the District up to 2035.
- 5.5 Warborough and Shillingford (north east of the A4074) is identified as 'smaller village' in the adopted Local Plan (Appendix 7). Shillingford (SW of the A4074) is identified as an 'other' village. Policy H8 of the Plan addresses development in smaller villages. Paragraph 4.37 of that Plan comments that smaller villages 'have no defined requirement to contribute towards delivering additional housing (beyond windfall and infill development) to meet the overall housing requirement of South Oxfordshire. It also advises that there is a sufficient supply of housing from strategic allocations and from existing planning permissions, which means that the less sustainable settlements will not be required to offset the housing requirement. It then advises that some parishes may still wish to proceed with preparing a neighbourhood plan for example to achieve the protection afforded by allocating housing to fund projects they want to deliver or they would like to identify a specific type of housing bespoke to their village's needs. The Council's strategy therefore allows them to do so, provided that the levels of growth are commensurate to the size of the village.
- 5.6 The Local Plan advises that is not generally expected that 'other' settlements classified as "Other Villages" will provide a significant source of housing supply. However, it is possible that some development proposals may come forward over the plan period in

these villages, such as single dwellings, infilling, and conversions from other uses. Such proposals will be considered against the relevant policies in this Local Plan.

5.7 The following other policies are particularly relevant to the submitted Plan:

Policy STRAT 1	The Overall Strategy
Policy EMP10	Development in Rural Areas
Policy ENV1	Landscape and Countryside
Policy ENV3	Biodiversity
Policy ENV4	Watercourses
Policy ENV6	Historic Environment
Policy ENV7	Listed Buildings
Policy DES1	Delivering High Quality Development

5.8 SODC and the Vale of White Horse District Council submitted their Joint Local Plan 2041 to the Secretary of State in December 2024 for examination, and an initial series of hearings have been held. The submitted Plan has been prepared within its up-to-date development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter. In the round the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

*Visit to the neighbourhood area*

5.9 I visited the neighbourhood area on 25 July 2025. I approached it from Oxford and Berinsfield to the north. This helped me to understand its position in the wider landscape in general and its accessibility to the strategic road network.

5.10 I looked initially at the proposed additional Local Green Spaces (LGSs) in Shillingford. I followed the Thames Path from the A4074 to the River and then walked to Benson. In doing so I saw the interesting network of footpaths in this part of Shillingford, the proposed Hazeley Meadow LGS and the Benson Flood Meadows. The part of the visit highlighted the obvious importance of the River Thames to the parish. On the way back to the A4074 I looked at the Wharf and saw the interesting chart of flood heights.

5.11 I then took the opportunity to look at Plough Field. I saw its relation to the built parts of the parish and to the wider countryside. I saw the interesting memorial to the 1955 World Ploughing Organisation event.

5.12 I then walked into Warborough. In doing so I saw the recent housing development to the immediate north of the school and the way in which it had incorporated much-needed car parking for the school. I also looked at the proposed gateway sites in the village.

- 5.13 During this part of the village, I looked at the various additional proposed Local Green Spaces. I saw the significance of the Six Bells public house, St Laurence's Church, the shop/post office, and the village hall to the local community.

## 6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan in the area;
  - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings.

### *National Planning Policies and Guidance*

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2024 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Warborough and Shillingford Neighbourhood Development Plan Review:
- a plan-led system - in this case the relationship between the neighbourhood plan and the South Oxfordshire Local Plan;
  - building a strong, competitive economy;
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
  - taking account of the different roles and characters of different areas;
  - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
  - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on a range of development and environmental matters. It consolidates existing policies in the Plan on design, village character, and local green spaces. In addition, it seeks to update the 'made' Plan to take account of changes in national policy since it was made.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for infill residential development (Policy H2), and for employment (Policy E1). In the social dimension, it includes policies on community infrastructure (Policies C1 and C2), and on local green spaces (Policy CA3). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on biodiversity (Policy ENV1) and flood risk (Policy ENV2). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

*General conformity with the strategic policies in the development plan*

- 6.11 I have already commented in detail on the development plan context in South Oxfordshire in paragraphs 5.4 to 5.8 of this report.

- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

#### *Strategic Environmental Assessment*

- 6.13 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, SODC undertook a screening exercise in January 2025 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

#### *Habitats Regulations Assessment*

- 6.15 SODC also prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It assesses the potential impact of the Plan's policies on a series of protected sites
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns about neighbourhood plan obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

#### *Human Rights*

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

#### *Summary*

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and WSPC have spent time and energy in identifying the issues and objectives that they wish to be included in the review of the Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on all the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial parts of the Plan (Sections 1 to 4)*

- 7.8 The Plan is well-organised and presented. It has been prepared with much attention to the information in the supporting text. It makes an appropriate distinction between the policies and the associated supporting text.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.10 The Summary and Background sections set out information about the way in which the review of the Plan has been developed and the issues which it has addressed. It properly identifies the neighbourhood area (on Map 1). The Plan period is highlighted in the Basic Conditions Statement. Nevertheless, I recommend that it is also shown on the front cover of the Plan, and is addressed in the Background section of the Plan so that the prescribed conditions (as set out in paragraph 2.6 of this report) are met.

*At the end of paragraph 2.4.1 add: 'The Plan period is 2025-2041.'*

*After the Plan title on the front page add '2025-2041'.*

- 7.11 Section 3 sets out information about the neighbourhood area. It provides interesting and comprehensive details which help to set the scene for the eventual policies. It also comments on the context provided by the development plan and the character of Warborough and Shillingford.

- 7.12 Section 4 sets out the vision, objectives of the Plan and the way in which they provide a context for the resultant policies. This relationship is shown is diagrammatically on both pages 4 and 19 of the Plan.
- 7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

*General comments on the Plan and the format of its policies*

- 7.14 The Plan is an excellent example of a review of a neighbourhood plan. It helpfully consolidates the review of the Plan into the structure of the 'made' Plan. This results in a series of new policies and the retention of existing policies in the 'made' Plan. The new policies are principally informed by the details in the appendices. Appendices 1 (the Design Guide), 2 (the Character Appraisal), and 3 (Local Green Space Assessment) are key elements of this package. In each case they take a very positive approach to their respective matters.
- 7.15 For the purposes of this report, I do not comment in any detail on the retained policies other than where they may have been affected by the adoption of the South Oxfordshire Local Plan or by updates in national planning policy. In some cases, I have recommended modifications to the wording of policies in the made Plan to reflect the approach and language now taken in neighbourhood plans (which has matured since the Plan was made). There are also recommended modifications to the supporting text based on SODC's representation. Where they directly relate to the modifications to the policy I have weaved my commentary on the supporting text on a policy-by-policy basis. Otherwise, the recommended modifications to the supporting text are set out in paragraph 7.124 of this report.

*VC1 Development Principles and the Character of Villages*

- 7.16 This policy is carried forward from the made Plan with a title change and additional policy wording relating to the updated Character Appraisal and the new Design Code. It also has sections on the proposed Shillingford Special Character Area and on non-designated heritage assets.
- 7.17 The outcome of the review is a very detailed and comprehensive policy. Much interesting work has been undertaken on the commentary about the various character areas. The policy takes a positive approach to the character of the neighbourhood area and has regard to Section 15 of the NPPF
- 7.18 Welbeck Strategic Land comment about the approach taken to landscape and local character. It advises that it not convinced by the evidence which underpins proposed policies VC1 and VC2, and the proposed Local Green Spaces. Significant elements of its representation overlap with the evidence that it has prepared for its recent planning application at Plough Field.
- 7.19 Oxfordshire County Council makes a series of detailed comments on the transport elements of the policy.



- 7.20 Julian Church and Associates comment that Ferry House has been reviewed by Donald Insall Associates 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. That organisation also comments about the wording used for non-designated heritage assets.
- 7.21 I have considered these various comments carefully, and related them to my observations of the neighbourhood area and the policy during the visit. In general terms I am satisfied that the policy has taken a positive approach to the various matters and is underpinned by up-to-date information. In the round it is a good policy which is underpinned by the Design Code (Appendix 1.0) and the Character Appraisal (Appendix 2.0). It significantly consolidates the approach taken in the made Plan and has regard to Sections 8 and 16 of the NPPF. Within this context I recommend the following modifications to bring the clarity required by the NPPF:
- the deletion of the reference to the attractions of the neighbourhood area for TV and film productions. This is a subjective factor and will relate to a range of issues outside planning control. Nevertheless, I recommend that this aspect of the parish should be addressed in the supporting text; and
  - the recasting of part f of the policy so that it has regard to paragraph 216 of the NPPF.
- 7.22 I looked carefully at the proposed Shillingford Special Character Area during the visit, and compared it with the information in the Character Appraisal. I am satisfied that this element of the Plan meets the basic conditions. Part g of the policy is careful not to operate in a prescriptive way.
- 7.23 WPC commented about its identification of Ferry House in Shillingford as a non-designated heritage assets in its response to the clarification note. However, based on WPC's subsequent comments, I am satisfied that Ferry House was not intended to be identified as a non-designated heritage asset, and I note that it is not included in the schedule of buildings in Appendix 5. As such no action or recommended modification is required.
- 7.24 I recommend that paragraph 5.1.27 is recast to acknowledge the comments from SODC. This will ensure that this element of the supporting text does not read as a policy. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace c with: Development proposals which adversely harm the historic character of the parish will not be supported.**

**Replace f with: 'The Plan identifies a series of non-designated heritage assets for Warborough and Shillingford (as set out in Appendix 5.0 Table X). The effect of an application on the significance of the identified non-designated heritage assets 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.'**

*Replace paragraph 5.1.27 with:*

*'WPC supports the approach set out in the South Oxfordshire Local Plan 2035 which advises that proposals for new development should be sensitively designed and should not cause harm to the historic environment. 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.'*

*At the end of paragraph 5.1.29 add: 'This matter is addressed in part c of Policy VC1. This approach will support the potential for the parish to continue as a location for filming for television and film.'*

#### VC2 Landscape & Green Gaps

- 7.25 This is a new policy supported by detailed evidence. It has two main parts. The first is a general policy on landscape. It is based on the findings of the SODC Landscape Character Assessment 2024, and is further refined by the information in the submitted Character Appraisal. This part of the policy also proposes the identification of two gateway sites (at Thame Road and at Henley Rd / Wallingford Rd).

- 7.26 The second part of the policy proposes the identification of a Green Gap (at Plough Field). The Plan comments that the proposed Green Gap

*'is the last remaining gap between the village of Warborough and the hamlet of 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 several 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.'*

- 7.27 SODC comment that:

*'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.'*

*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.*

*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.'*

- 7.28 Oxfordshire County Council comment about the appropriateness of the highways elements of the policy.
- 7.29 Rectory Homes comments that identifying a Green Gap and two gateway sites will prevent the development of natural housing sites in the neighbourhood area.
- 7.30 Julian Church Associates comment:

*'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.*

*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.'*

#### *The general element of the policy*

- 7.31 In general terms the policy takes a positive approach to landscape issues, and the work on the Character Appraisal builds locally upon the more general SODC Landscape Character Assessment 2024 work. I looked carefully at the different elements of the policy during the visit. I am satisfied that the Important Open River Frontage and the Important Open Landscape Frontage elements of the policy are appropriately addressed in the Plan, and provide a helpful and distinctive element to its contents.
- 7.32 In the round I am satisfied that the overall policy takes an appropriate and proportionate approach towards new development and has regard to Section 11 of the NPPF. Within this broader context, I recommend that the opening element of the policy is recast so that the criteria reflect that they will not always universally be practicable. I also recommend that the first criteria acknowledges that enhancement to the character of the neighbourhood area may also not be practicable. I recommend the deletion of the unclear reference to 'disruptive' in the fourth criterion. Finally, I recommend that criterion g is subdivided into its separate components.

7.33 SODC makes several comments about the wording used in the supporting text. I agree with the proposed changes and address similar issues in paragraph 7.124 of this report.

7.34 The first part of the policy also comments about two gateway sites. The Plan describes them as follows:

***‘Thame Road** - the approach to Warborough from the north is extremely low key and rural in nature. Although there is one property on the eastern side of the village, this is generally very well screened with glimpsed views. In this regard the impression of the eastern side of the village is a well vegetated environment with small, enclosed field parcels. This is unlike the other areas of the village which have vast open arable fields giving rise to long-distance views. This area of land originally formed an area of small orchards, which is very much characteristic of historic Warborough (see Figure 5 Warborough 1912). Whilst none of the trees survive on site the small, enclosed field parcels highlight the historic land use which can be identified on plans until the 1960s. The site is considered a small but important gateway site and setting of the conservation area. This area should remain open to maintain the rural countryside to village transition that is currently experienced.*

***Henley Rd/Wallingford Rd** - prior to the construction of the Shillingford Roundabout, a crossroads existed with the Old Bell Inn as its landmark feature. The fields to the southwest were visually open and a clear view of the properties on Wharf Road (now the Conservation Area) could be gained. Little has changed from this time and the area still provides an important gateway site and enhances the setting of the Conservation Area maintaining distance from the busy Wallingford and Henley Roads. The area around the roundabout has been urbanised with signage and other visual clutter. It is important that no further urbanisation of this area takes place and that the setting of the Shillingford Conservation Area is not eroded further.’*

7.35 In its response to the clarification note on how the gateway sites would be addressed within the overall policy, WPC advised that

*‘Criteria a) to f) apply to the entire (neighbourhood) area including the identified sites and Identified Frontage Areas. Criteria g) is an additional consideration which applies to sites 2 and 3 and Important Frontage Areas as defined on figure 14. It may be better to make it clearer that the Gateway sites and the Important Frontages perform specific functions within the landscape, which need to be retained.’*

7.36 I looked at the two proposed gateway sites carefully during the visit. I am satisfied that the gateway site off Thame Road meets WPC’s ambitions for the identification of such sites. As the Plan comments, the approach to Warborough from the north is extremely low key and rural in nature. Although there is one property on the eastern side of the village, this is generally very well screened with glimpsed views. In this regard the impression of the eastern side of the village is a well vegetated environment with small, enclosed field parcels. It provides a very pleasant northern gateway and context to the village.

- 7.37 In contrast I am not satisfied that the proposed gateway site off Henley Rd/Wallingford Rd is a gateway into the village. From my observations I concluded that it was part of the wider open agricultural context and setting of the neighbourhood area on either side of Henley Road. As such I recommend its deletion from the policy.
- 7.38 Paragraph 5.1.41 of the Plan advises that the gateway sites are essential to the character and setting of the settlements, and part g of the policy advises that development proposals should respect the gateway to the settlements. In this context I am not satisfied that the policy element has the clarity required by the NPPF. The same issue is raised by Julian Church Associates in its representation.
- 7.39 I note that neither of the two proposed gateway sites are identified as local green spaces in the Plan (within which a presumption against development arises in accordance with the NPPF). In this context I recommend that the policy element is modified so that it advises that any development proposals should respond positively to the identified gateway off Thame Road. This will ensure that any development which otherwise meets the other more general criteria in the policy should also ensure that the site continues to fulfil a gateway function. I also recommend the inclusion of SODC's comments about the need for landscaping associated with any development within the identified gateway site.

#### *Green Gap*

- 7.40 I have considered the proposed Green Gap very carefully. The Green Gap is also proposed as a local green space. I have considered that element of the Plan later in this report (paragraphs 7.93 to 7.102)
- 7.41 The Plan defines the proposed Green Gap as follows:
- 'Plough Field - this gap is the last remaining gap between the village of Warborough and the hamlet of 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 several 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.'*
- 7.42 I looked at the proposed Green Gap from the memorial by Plough Field and through the hedge along the eastern side of Thame Road.
- 7.43 I note that Welbeck Strategic Land submitted a recent planning application for the residential development of the site which was refused planning permission. An appeal was made but was subsequently withdrawn. The Welbeck representation comments extensively about the way in which several of the Plan's policies impact on the proposed development.

- 7.44 I sought WPC's comments on the extent to which the Plan's reference to the Green Gap as 'this gap is the last remaining gap between the villages of Warborough and Shillingford' relates to land to the eastern side of Thames Road. In its response it advised that:

*'it is worth noting that the land on the western edge of Warborough and Shillingford falls within the Green Belt. At the time of assessing the character of the area, it was believed that land within the Green Belt was provided adequate protection.'*

- 7.45 I also sought WPC's comments on the extent to which the Character Appraisal assess the significance of the proposed Green Gap in relation to the existing physical interrelationship between Warborough and Shillingford along Thames Road/Warborough Road. In its response it advised that:

*'Notwithstanding the commentary with regard to the designation of Plough Field as a LGS, the following sets out the reasoning for the alternative proposal for a Green Gap. Extracts from pages 14 and 15 of the Character Appraisal are highlighted overleaf to assess the physical interrelationship between the settlements.'*

*In summary, the evidence base work undertaken highlighted that development on the eastern side of Thames Road would close the last remaining gap between the villages of Warborough and Shillingford. It would introduce built form into a clear visual break between settlements. Effectively merging them into a single, settlement, which would comprise of a central area of sub-urban sprawl, contrasting with the current experience of the two historic settlements. The (Character Appraisal) provides detailed analysis of the Parish settlement areas and their setting in addition to a section on 'Green Gaps' which refers to land between neighbouring settlements that are vulnerable to physical or visual coalescence.*

*Green Gaps were introduced into the Neighbourhood Plan to prevent the sprawl and creep of development by maintaining a space between settlements. With the gap maintaining a sense of place and individual identity between settlement areas.*

*The Character Appraisal sets out and contains a visual analysis of the site in terms of perception and its contribution to the setting of the settlements.*

*From a settlement perspective, the experience is that there is a distinct break in built form. Whilst on plan there may appear to be continuous built form, the impression on the ground is of isolated farm or independent cottages. These appear unrelated to the central focus of either settlement and historically are shown to be located along the important north-south route from the River Thames crossing.*

*The gap between Warborough and Shillingford is visually apparent when traversing the single route between the two settlements. The experience is not of continuous development or one single settlement entity. The rural experience lessens as one travels further north with the introduction more modern built form including low garden walls.*

*With no development on the eastern side of the road until one reaches Hawthorn Cottage, this is perceived as the natural start of Warborough village where the feeling of open countryside diminishes and urban form becomes more apparent.'*

- 7.46 WPC makes a well-reasoned case for the identification of a Green Gap, and I have noted the very strong public feeling on this matter. Nevertheless, based on the evidence and my own observations, I have concluded that:
- Warborough and Shillingford are already joined in a physical way on the western side of Thame Road;
  - the proposed Green Gap is largely hidden from public view by the extensive hedge along the eastern side of Thame Road; and
  - whilst the field is separated by fencing from the more extensive agricultural landscape to the east, it forms part of the broader agricultural hinterland for the neighbourhood area.
- 7.47 As such I have concluded that Plough Field does not perform the traditional function of a Green Gap separating two settlements the one from the other. In these circumstances I recommend that the proposed designation is removed from the Plan. I also recommend a series of consequential modifications to the supporting text.
- 7.48 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**'As appropriate to their scale, nature, and location, development proposals should demonstrate how they:**

- **preserve and where practicable 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;**
- **have taken into consideration the recommendations of the Warborough & Shillingford Design Code (Appendix 1.0);**
- **retain and where practicable enhance the tranquillity of the neighbourhood area;**
- **minimise the impact of development on the landscape;**
- **minimise any impacts arising from development, including those sites on the edge of the parish that adversely impact upon the neighbourhood area;**
- **provide an appropriate landscape buffer to identified biodiversity sites, including Warwick Spinney Parish Wildlife Site;**
- **respond positively to the gateway to Warborough on the eastern side of Thame Road (shown as site 2 on Figure 14) and incorporate sufficient landscape mitigation to avoid adversely impacting the rural nature of Warborough and Shillingford.; and**
- **respond positively to identified important open landscape frontage and open important river frontage shown in Figure 14.'**

*On Figure 14 remove 1 (Plough Field) and 3 (Henley Road/Wallingford Road)*

*Replace the heading 'Green Gap and the Setting and Gateway to the Settlements' with 'The Setting and Gateway to the Settlements'*

*Delete paragraph 5.1.38*

*Delete paragraph 5.1.40*

Replace paragraph 5.1.41 with 'A site is identified as being an essential gateway site which is essential to the character and setting of the settlements (site 3). Further details are provided below.'

*Delete paragraphs 5.1.42 and 5.1.44.*

### VC3 Important Local Views

- 7.49 This is a new policy and additional views are identified. The approach taken is underpinned by the details in the Character Appraisal. The policy seeks to protect and where possible enhance those views and vistas that are important to the community and which help to define the character and setting of the villages and their surrounding rural areas
- 7.50 I note that the views are identified in each character area in the Character Appraisal and separately in Appendix 15. This is best practice.
- 7.51 The Plan advises that views in and out and across the parish are highly valued as they instil a sense and appreciation of our place and our connection to nature. They include to the west, the Wittenham Clumps and to the east the agricultural fields framed by uninterrupted horizons of the Chilterns. To the north lie mixed use farmlands melding into small villages, thus creating the rural atmosphere to the village which makes it so popular to residents and visitors alike.
- 7.52 The Plan also comments that the views reinforce the sense of Warborough and Shillingford as small villages in a countryside setting. The Character Appraisal provides more insights to ensure the understanding of views remains relevant and provides sufficient detail to assist development decisions to include important landscape views as well as those within the Conservation Areas.
- 7.53 SODC comment that:
- '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.'*



- 7.54 Rectory Homes comments about the increased number of views in the Plan and its concerns about proposed Views VO2 and VO2.1 and their effect on its emerging proposals for the development of Cuckoo Penn in Warborough. I looked at the parcel of land to the east of Thame Road during the visit. I note that Rectory Homes is looking to discuss its development concept further with SODC and WPC. This is a separate issue beyond this examination. However, for the purposes of assessing this policy against the BCs I focus simply on the proposed policy.
- 7.55 I looked at a selection of the identified views during the visit. Based on all the evidence I am satisfied that WPC has taken a very informed approach to the identification of the views.
- 7.56 I have noted SODC's concerns over the wording of the policy. However, I am satisfied that the approach taken is appropriate and attempts to identify how development proposals should respond to the views rather than preventing any unacceptable harm. Nevertheless, I recommend that the wording used is modified so that it requires a positive response to the views rather than an unclear requirement to 'maintain' them.
- 7.57 Based on all the evidence, I am satisfied that proposed View VO2 from the north and west of land at Cuckoo Penn (as highlighted by Rectory Homes) is appropriate for identification in the Plan. It provides a clear view across the site/paddock towards the tree belt to the east. However, I am not satisfied that View VO2.1 has the same significance. It is obscured by the height of the roadside hedge, and in any event, provides a similar view to that of VO2. On this basis I recommend that it is deleted from the policy and from Figure 20.
- 7.58 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the opening element of the policy with:**

**As appropriate to their scale, location and nature, development proposals should respond positively to the following key views and vistas as shown in Figures 18 to 20 and in the table below:'**

**Delete View VO2.1 in the schedule in the policy**

*Delete View VO2.1 from Figure 20*

VC4 Dark Night Skies

- 7.59 This is a new policy. It properly addresses the dark night skies in and around the neighbourhood area.
- 7.60 SODC comments that:

*'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 hierarchy of avoidance and then mitigation as suggested in the supporting text.'*

- 7.61 I agree with SODC's comments and recommend accordingly. Whilst the policy is recast and simplified so that it has the clarity required by the NPPF, its purpose and effect remain unchanged. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the policy with:**

**'Development proposals should be designed to minimise light pollution, both external lighting and because of light leakage from the interior of buildings. Adverse effects from the installed lighting should be avoided where practicable. Where this cannot be achieved, any adverse impacts should be appropriately mitigated e.g. activated by sensors and turned off by timers.'**

**Development proposals will be supported if they:**

- **have been designed to minimise sky glow by the appropriate use of luminaires with zero upward light;**
- **have been designed to minimise disturbance to wildlife, biodiversity, and their food sources;**
- **minimise visually detrimental impacts on their immediate or wider setting or to landscape character; and**
- **minimise large areas of glazing within the building design which would result in light spillage into rural and unlit areas.'**

**H1 Housing Mix**

- 7.62 This policy is carried forward from the made Plan with additional references to delivery of small housing units and independent elderly homes.
- 7.63 Rectory Homes comments that the Plan does not allocate sites, and on this basis, it is unlikely to deliver the ambitions of this policy. Whilst I understand this comment, there will be an adequate opportunity for developers to respond to market conditions through the development of infill sites (pursuant to the provisions of Policy H2 of this Plan and other development plan policies).
- 7.64 In the round I am satisfied that the policy has regard to Sections 5 and 8 of the NPPF and meets the basic conditions. The policy will contribute to the local delivery of the social dimension of sustainable development.

**H2 Infill Development**

- 7.65 This policy is carried forward from the made Plan with minor wording amendments. It seeks to identify what will and will not be considered as infill development in the neighbourhood area. In this context it seeks to exclude backland development from the definition of infill development. This approach does not fully accord with the approach taken in Policy H16 of the adopted Local Plan.

7.66 SODC comment that:

*'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 "not considered backland (building in the rear garden of properties, which can require unsuitable access and reduce the privacy of adjoining properties)". 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.*

7.67 Oxfordshire County Council suggests that several of the criteria in policy are modified.

7.68 Julian Church and Associates comment that

*'Policy H2 would 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'.*

7.69 In response to the various comments WPC comment that:

*'From a detailed appraisal of the built form of the Plan Area. The Character Appraisal was prepared both in desktop appraisal format, looking at the evolution of the settlement plan form over time to the present day. This took into account the patterns of development and the relationship between the phases of building and spaces over time. Further work was undertaken with the community in the form of a walking workshop around the Parish, which also included local historians / evidence from the local history society. The individual character areas were devised (using the previous character appraisal as a basis for the work), and each area was examined in great detail as shown in the recommendations at the end of each area assessment. With the exception of the modern estate development and some farmyard development, the overriding form, was of development which was one plot deep (although these may also contain associated outbuildings etc. From this predominant form of development the definition of infill has been determined for the NP. The supporting text to the policy clarifies that whilst the settlements are 5, there are some modern developments, where tandem or backland development may be suitable. A detailed review of the built form in the Character Appraisal and on Google Maps highlights that such sites are very limited in number, if any. Criteria 3 of NP Policy H2 in particular is consistent with the*

*Local Plan approach. The concern is that quite often backland plots compromise pedestrian and cycle safety, particularly where narrow vehicle access points conflict with crossing paths. The policy seeks to ensure sufficient consideration and information is submitted alongside an application.'*

- 7.70 This is another important policy in the Plan. In this case a key issue is the extent to which the approach taken has regard to Policy H16 (Backland and Infill Development and Redevelopment) of the adopted Local Plan. That policy is a strategic policy.
- 7.71 I looked at the form and layout of built development in the neighbourhood area carefully during the visit. I have also considered WPC's helpful and detailed response to the clarification note on the representations. I note that there is a degree of tension between the definition of infill development (that excludes backland development) and the details of paragraph 5.2.23. On the balance of the evidence, I recommend that the final bullet point of 5.2.22 is deleted. Whilst WPC has helpfully described the settlement pattern in the neighbourhood area it acknowledges that proposals for backland development may be acceptable if they are supported by appropriate evidence. In addition, paragraph 5.2.24 and 5.2.25 highlight that the Design Code has included appropriate checks and balances should such proposals come forward. Furthermore, the part of Policy H16 of the Local Plan which addresses backland development is underpinned by a series of environmental criteria.
- 7.72 I recommend that the policy is recast so that its requirements are clearer and identify specific requirements for developers rather than to identify more general what should not arise from new development. I also recommend detailed modifications to some of the criteria as highlighted by the County Council. I also recommend that the separate element of the policy on self-build is deleted. This acknowledges that it comments about the extent of the policy rather than being a specific land use policy. In any event it is already adequately addressed in the supporting text (paragraph 5.2.29).
- 7.73 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

**Replace the policy with:**

**'Infill developments within the built-up area of Warborough and Shillingford will be supported where they meet the identified infill definition above, accord with the Design Code in Appendix 9.1, and will:**

- **respond positively to the amenities of adjacent residential properties;**
- **provide vehicle access designed in accordance with the appropriate design safety standards and, as such, does not impact on highway safety; and provides vehicles with appropriate parking and turning arrangements;**
- **provide vehicle/cycle parking and turning arrangements in accordance with Oxfordshire County Council design and parking standards; and**
- **provide safe and secure access for cyclists and pedestrians.'**

*Delete the fourth bullet point in paragraph 5.2.22 and reposition the use of 'and' to the end of the second bullet point.*

*Replace paragraph 5.2.23 with:*

*'The above definition aligns with the general approach towards infill development set out by SODC in Policy H16 of the Local Plan. However, due to the detailed analysis of the predominantly linear settlement patterns as set out in the Character Appraisal detailed guidance is set out in the Appraisal in respect of backland development. These are highlighted in the next two paragraphs. It is acknowledged that there may be some more modern parts of the Parish, where in-depth development has taken place.'*

### H3 Active Travel

- 7.74 This policy is carried forward from the made Plan with a title change and additional policy wording relating to pedestrian and cycle linkages and traffic evidence.
- 7.75 I am satisfied that the overall thrust of the policy is appropriate and has regard to Section 9 of the NPPF. Nevertheless, I recommend that the policy's emphasis should shift from one which offers support to proposals to one which comments about requirements for development proposals. This will acknowledge that development proposals will be assessed against all relevant development plan policies.
- 7.76 I also recommend detailed modifications to the wording of the various criteria to respond to the comments from SODC and the County Council. This includes the deletion of criterion g which is already addressed in the supporting text (subject to modifications). In any event it addresses a process point (the submission of information) rather than a land use policy matter. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**'As appropriate to their scale, nature and location, development proposals should:**

### **Links to Community Facilities and Services**

- **be well-connected with the existing network of pedestrian links in the neighbourhood area, and have regard to the principles of the Oxfordshire Street Design Guide, the District Council Joint Design Guide, and the Warborough and Shillingford Design Code;**
- **be arranged so that it takes account of the existing local footpath network in their immediate locality; and**
- **respond positively to the principles of the Warborough and Shillingford DC (Appendix 1.0);**

### **Pedestrian Links**

- **where appropriate, ensure that new pedestrian links are designed and sited to provide separation between road traffic and pedestrians;**

## Cycle Links

- provide suitable on-site and off-site cycle links both in general and to facilitate access to the village amenities, transport links and community facilities and surrounding settlements; and
- where appropriate, contribute to improvements to existing cycling facilities. All new and improved cycle paths and facilities should have regard to the Oxfordshire Cycling Design Standards and LTN 1/20 or any updated guidance.'

*Replace paragraph 5.2.44 with:*

*'When assessing impacts under Policy H3, reference should be made to a traffic survey to accompany any associated planning application. Any deficiencies in traffic capacity and safety identified should be addressed in the submitted development proposal.'*

## H4 Parking Provision

- 7.77 The Plan advises that this policy is carried forward from the made Plan with additional details about car parking and inclusion of reference to cycle parking and impact of motor vehicles.
- 7.78 SODC makes a series of helpful comment on the wording used in the policy. I also note that Welbeck Strategic Land comment about the way in which it considered that its proposals for the development of land would satisfy the requirements of this policy.
- 7.79 In general terms, the policy takes a positive approach to this issue, and has regard to Section 9 of the NPPF. Within this context I recommend that part e of the policy is modified and simplified by the removal of the garage conversion element and advising that this approach may not always be practicable. I also recommend detailed modifications to elements of part f of the policy to acknowledge that some of the elements mentioned may benefit from permitted development rights.
- 7.80 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each the three dimension of sustainable development.

**Replace e) with: 'Ensure that existing parking provision remains available on the site concerned wherever practicable.'**

**At the beginning of part f. iii. and v. add 'Insofar as planning permission is required'**

## H5 Safeguarding Affordable Housing

- 7.81 This policy is carried forward from the made Plan with minor wording amendments. It comments that proposals that would result in the loss of existing affordable housing through either redevelopment or change of use will not be supported. I am satisfied that both the purpose and the intentions of the policy remain and meets the basic conditions.

7.82 SODC suggests that the policy should be repositioned in the Plan so that it follows Policy H2. This would be an appropriate approach. However, it is not needed to ensure that the policy meets the basic conditions.

7.83 The policy will contribute to the local delivery of the social dimension of sustainable development.

#### C1 Community Infrastructure

7.84 This policy is carried forward from the made Plan with additional references to infrastructure provision.

7.85 SODC make a series of comments on the relationship of the submitted policy to Policy CF1 of the Local Plan. I have also looked in detail at WPC's responses to those comments. Whilst I understand WPC's concerns about the potential loss of community facilities, I recommend that SODC's suggested changes are incorporated into the policy with minor revisions.

7.86 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social dimension of sustainable development.

**Replace the second part of the policy (Loss of Facilities) with: '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 not be supported unless:**

**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; or**

**b) it has been determined that the community facility is no longer needed; or**

**c) it can be demonstrated that the asset or facility is no longer viable.**

**Replace the third part of the policy (Infrastructure Provision) with: 'As appropriate to their scale, nature and location, development proposals should:**

- **demonstrate that the existing infrastructure is sufficient or can be provided as part of the development;**
- **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. Wherever practicable new cables should be buried;**
- **allow for the use of pushchairs, mobility scooters, etc;**
- **allow social integration in the villages where developments are to be open to the public;**
- **show in the Design and Access Statement, if required, or other supporting information, how their design allows for adaptable dwellings; and**
- **provide storage facilities for rubbish receptacles and cycles.'**

## C2 Improvements to Community Assets

- 7.87 This policy is carried forward from the made Plan with minor wording amendments.
- 7.88 I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social dimension of sustainable development.

## C3 Local Green Spaces

- 7.89 This policy is carried forward from the made Plan (which included four Local Green Spaces) and several other local green spaces are proposed. The Plan advises that WPC commissioned a Local Green Space (LGS) Assessment. The proposed additional LGSs are shown in Table 3 (and on the maps Figures 31 and Figure 32). I looked at the proposed additional LGSs during the visit.
- 7.90 Paragraph 5.13.9 advises that proposed LGS04 Plough Field is also identified as a Green Gap (in Policy VC2). The Plan comments that the site performs both functions, as highlighted by the community and independent review. As both approaches have merit and evidence, WPC has decided that where development is proposed which meets the very special circumstances requirements, Policy VC2 criteria would apply. I have commented earlier on the identification of Plough Field as a Green Gap. I comment separately below on its proposed designation as a LGS.
- 7.91 Rectory Homes expresses concern that the cumulative effect of the proposed LGSs will represent an extensive tract of land affected by such designations. Whilst I have noted this comment the assessment for LGSs against the criteria in the NPPF is on an individual basis rather than their cumulative size (on the local in character criterion in paragraph 107c in the NPPF).
- 7.92 Putting Plough Field to one side I am satisfied that the additional proposed LGSs within the neighbourhood area meet the criteria in paragraphs 106 and 107 of the NPPF. I noted the significance of Benson Meadows in the local landscape. Nevertheless, I recommend that it is deleted from Figure 31. This acknowledge that land outside a neighbourhood area should not be included in a neighbourhood plan.

### *Plough Field*

- 7.93 The LGS Assessment advises that Plough Field has importance as a public vantage point over the Chilterns NL and historically and culturally as the home to the World Ploughing Championship in 1954.
- 7.94 Welbeck Strategic Land comment that:

*‘The suggested justification 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 (Plan).*

*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.*

*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.*

*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*

*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.*

7.95 In its response to this representation WPC advised that:

*‘The Steering Group believe that there is sufficient evidence to demonstrate that the Plough Field site meets the requirements of a Local Green Space on both Beauty and Historic significance grounds. As already submitted, the site is valued by the community in terms of beauty for its visual attractiveness, contribution to landscape and the expansive views gained, its important role in the setting of both settlements and preserving their individual identity.*

*It is also considered that the visual attractiveness of the site is clear. It makes a valuable contribution to landscape as viewed by the community from this area. The site enables excellent long-distance views through to the Chilterns which are distinctive and highly regarded.*

*The location of the site is essential in retaining the character of both individual settlements and adds to the rural character of the area. It makes an important contribution with regard to the physical form and layout of both Warborough and Shillingford and the last remaining gap in built development.*

*It may also be helpful to note that the site was subject to a recently refused planning application (P23/S4082/O) and subsequent withdrawn appeal. The Council’s Landscape Officer was consulted during the course of the application and made many valuable observations relating to the landscape and amenity value of the site.*

7.96 WPC also commented about the extent to which it is appropriate for a neighbourhood plan to identify the same parcel of land both as a Green Gap (in Policy VC2) and as a

Local Green Space when the policy implications of the two designations are different, and advised that:

*'we understand that it may be difficult to reconcile the two designations and would be willing to concede one if the examiner believes this is necessary for the plan to meet basic conditions. The community believe that the land is demonstrably special to them, such that it warrants the designation of a Local Green Space designation. At the same time however, they understand that this is a high bar to reach. They believe that sufficient information has been submitted to warrant such a designation, but if the Examiner disagrees, then for the land to have no weight other than open countryside would not reflect the views of the community or the work undertaken by our volunteers and independent consultants in the Character Appraisal. The site has merit for each, as per the evidence set out in the supporting text for each policy in the revised plan and supporting Character Appraisal on pages 10-15, 31, 33, 34, 44, 45, 50, 51., therefore it is hoped that if the Examiner is not minded to grant the designation of a Local Green Space for this site, he will agree that it fulfils the purposes of a Green Gap.'*

- 7.97 I note the commentary in the LGS Assessment (Appendix 3), and saw the interesting monument during the visit. In this context I sought WPC's advice about whether the World Ploughing Championship had been a one-off event (held in 1954) or has it been repeated since that time (either in the parish or elsewhere)? In its response WPC advised that:

*'The World Ploughing Championships or Contest have only taken place three times in the UK since beginning in 1953. Once in Shillingford, then in Taunton in 1971, and finally in Lincoln in 2000. The site has also been used on a number of occasions to host the British National Ploughing Championships, in addition to the World Ploughing Championships. There are a number of venues where the British National Ploughing Championships have taken place, but this site has been consistent since the championships began in 1951. It should also be noted that there are only a few sites within Southern England, which have held this event.'*

- 7.98 I have considered all the evidence and commentary on Plough Field very carefully. In doing so I have noted that a planning application P23/S4082/O has been refused on the proposed LGS and that the subsequent appeal has now been withdrawn. Plainly any resubmitted proposal will be a matter for SODC to determine in the usual way and within the context of the development plan at that time. As such I concentrate my assessment on the criteria for LGS designation in the NPPF.
- 7.99 I am satisfied that the proposed LGS is within close proximity to the community it serves (NPPF107a). It is readily accessible from both Warborough and Shillingford. I am also satisfied that it is local in character and not an extensive tract of land (NPPF 107c)
- 7.100 I have considered carefully the extent to which the proposed LGS is demonstrably special to the local community and holds a particular significance (NPPF107b). In doing so I have noted the broad level of local support for the Plan. Based on all the

evidence, including my own observation, I am not satisfied that this criterion has been met. I have reached this conclusion for the following reasons:

- in functional and land use terms the land concerned form part of the wider agricultural landscape in the neighbourhood area;
- it is not uncommon within the neighbourhood area to experience extensive views to the Chilterns National Landscape;
- whilst the World Ploughing Championship is now an established event, it has only been held once in Shillingford, and on two other sites in the UK; and
- the World Ploughing Championship is a relatively recent event in historic terms.

7.101 I also note that the proposed LGS scores modestly in WPC's assessment of LGSs (Appendix 3).

7.102 In this context I recommend the deletion of Plough Field as a LGS.

7.103 The policy takes the matter-of-fact approach used in paragraph 108 of the NPPF. Nevertheless, I recommend that permitted is replaced with supported to reflect the role of a neighbourhood plan in the overall development plan. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**In the second paragraph of the policy replace 'permitted' with 'supported'**

**Delete Plough Field from the schedule**

*Delete SO4 Plough Field from Figure 31*

*Delete the Benson Meadows details from Figure 31*

**E1 Enhancement of Employment Facilities**

7.104 This is a rather unusual policy. Its wording is a near repeat of the wording which was included in the Submission version of what is now the made Plan. The Examiner for the Plan recommended the policy be modified.

7.105 The submitted policy has three main components:

- the development of new employment facilities within the built-up area of the village will be supported subject to three criteria;
- proposals located outside the built-up form of the village will be supported where they meet the three criteria in this policy and where they respect the character of the countryside in which they are located; and
- proposals for tourism, rural business and craft-related developments will also be supported where they meet other development plan policies.

7.106 I recommend that the policy is modified so that it follows the format of the policy in the made Plan. The approach taken in the made Plan and in the recommended modifications to this Plan acknowledge that there is a clear difference between development proposals within the built-up part of the village and those in the

countryside. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the policy with:**

**‘The development of new employment facilities within the built-up area of the village will be supported subject to the following criteria:**

- **the proposal respects the character and appearance of the immediate locality in terms of its height, scale, design, and massing;**
- **the proposal does not cause an unacceptable impact on the amenities of nearby residential properties; and**
- **the proposal provides adequate parking, servicing, and access arrangements in accordance with the most-recently published standards of Oxfordshire County Council.**

**Proposals for new or extended business premises outside the built-up areas of the neighbourhood area will be supported where they are appropriate to a countryside location and are consistent with other development plan policies.’**

ENV1 Protecting and Enhancing Biodiversity

7.107 This is a new policy. It is underpinned by extensive supporting text. The policy has three key elements as follows:

- development proposals should respect the natural environment and protect and enhance biodiversity as shown in Figures 39 to 41;
- where practical, development proposals should seek to deliver a minimum biodiversity net gain of 20% (notwithstanding development which is exempt);
- as appropriate to their scale, nature and location, development proposals should meet a series of criteria.

7.108 The policy also addresses wildlife buffers and biodiversity enhancements.

7.109 In general terms this is a positive policy which has regard to Section 14 of the NPPF. In this general context I recommend the following modifications to bring the clarity required by the NPPF and to allow SODC to be able to implement the policy through the development management process:

- a recasting of the second part of the policy so that it sets out the national requirement for biodiversity net gain and then encourages development proposals to seek a higher amount where practicable;
- includes a reference to local wildlife sites in the third part of the policy;
- in the wildlife buffers element of the policy delete the reference to native trees (in the first criterion);
- Delete the final sentence of criterion iii; and
- revising the policy title.

7.110 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the second part of the policy with: ‘Development proposals should achieve biodiversity net gain in accordance with national legislation. Where practicable, development proposals should seek to deliver a minimum biodiversity net gain of 20%.’**

**Replace the first criterion of the third part of the policy with: ‘Ensure that existing wildlife habitats are safeguarded, retained, and enhanced, particularly those identified as priority habitats, local wildlife sites and other forms of wildlife corridor or specific biodiversity areas.’**

**Delete the final sentence of criterion iii).**

*Replace the policy title with: ‘Protecting and enhancing nature, and achieving biodiversity net gain.’*

#### ENV2 Flood Risk Mitigation & Management

7.111 This is a new policy. It advises that development proposals for new housing should demonstrate that they will meet five criteria. Its final element also advises that Development proposals for new housing should demonstrate that they achieve 100% surveyed, legal ground levels above 48.1m AOD.

7.112 SODC advise that:

*‘The 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. 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.*

*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’*

7.113 Thames Water makes a series of technical points and suggests an additional policy and supporting text

7.114 I have considered these comments carefully alongside WPC’s responses to the comments. In the round I am satisfied that the policy takes a positive approach to these matters and has regard to the NPPF. Nevertheless, to bring the clarity required by the NPPF and to allow SODC to be able to implement the policy through the development management process I recommend the following package of modifications:

- the inclusion of a proportionate element into the first part of the policy. This acknowledges that individual development proposals will have different implications on flooding and drainage in the parish; and

- the deletion of the final part of the policy. This acknowledges that it was calculated for a specific purpose (a recent planning application) and that it would be inappropriate to define that outcome across the neighbourhood area.

7.115 I have recommended specific modifications to the supporting text later in this report. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the opening element of the policy with: ‘As appropriate to their scale, nature and location, development proposals for new housing should demonstrate that they will:’**

**Delete the final element of the policy (relating to the 48.1m AOD level)**

ENV3 The Energy Hierarchy

7.116 This is a new policy. It is wide-ranging in its scope and is supported by extensive and locally-distinctive supporting text.

7.117 In general terms the policy takes a very positive approach to the energy hierarchy and has regard to Section 14 of the NPPF. Nevertheless, to ensure that the policy has regard to the NPPF and allow SODC to be able to implement it effectively through the development management process I recommend the following modifications:

- the recasting of part a) so that it sets out requirements for development proposals rather than advising that they will be supported. Such an approach could have unanticipated consequences.
- recasting the wording in part b); and
- a similar approach to part d) as recommended for part a).

7.118 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace a) with ‘Proposals for new housing and adaptations to existing properties should include measures to reduce energy consumption and the adoption of renewable energy sources as highlighted in the Design Code (Appendix 1.0);’**

**Replace b) with ‘Other than in the Green Belt, proposals for Solar Arrays will be supported on agricultural land of Grade 4 or below where they do not impact negatively on any designated views or biodiversity habitats, do not increase the risk of flooding and do not conflict with the findings of Appendix 1.0 of the Design Code.’**

**Replace d) with ‘Proposals for adapting historic buildings for energy and carbon efficiency should demonstrate that they have regard to relevant Historic England Guidelines.’**

## Implementation and Monitoring

7.119 Section 6 of the Plan addresses the implementation, review, and monitoring of the Plan in a very positive way. It advises that the neighbourhood plan will be assessed and reviewed as follows:

- an Initial Review (one year after it is made);
- thereafter the Plan will be reviewed every five years; and
- an end of Plan review.

7.120 The approach taken is very comprehensive. In this broader context I recommend that commentary about the implications of the adoption of the Joint Local Plan are weaved into this part of the Plan.

*At the end of paragraph 6.2.3 add: 'The adoption of the Joint Local Plan will alter the strategic planning policy context in South Oxfordshire. In this context the Parish Council will assess the need for a further partial or full review of the neighbourhood plan within six months of the adoption of the Local Plan.'*

## Other Matters - General

7.121 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for SODC and WPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.*

## Other Matters – Specific

7.123 SODC has made a series of helpful comments on the Plan. In some cases, I have included them in the recommended modifications on a policy-by-policy basis where it will enhance the legibility of this report.

7.124 I also recommend other modifications to the text of the Plan based on SODC's comments insofar as they are necessary to ensure that the Plan meets the basic conditions. They either revise the wording used or bring the Plan up-to-date. Other matters relate to the more general parts of the Plan. SODC also highlights a series of typographic/presentation changes to the Plan. It would be entirely appropriate for these revisions and corrections to be incorporated into the Plan. For convenience I list them using the relevant reference numbers in the SODC representation below:

- 1 (General commentary on the December 2024 NPPF)
- 2 (General commentary maps)
- 3 (paragraph 1.2.5)
- 4 (paragraph 2.3.2)
- 5 (Figure 3)
- 6 (paragraph 5.1.22)
- 8 (Figures 10 and 11)
- 10 (paragraph 5.1.35)
- 11 (Figure 13)
- 12 (paragraph 5.1.37)
- 14 (Figure 14)
- 16 (paragraphs 5.1.46/49)
- 18 (paragraph 5.1.58)
- 19 (Figures 18-20)
- 21 Figure 22
- 23 (paragraph 5.2.3)
- 24 (paragraph 5.2.4)
- 25 (paragraph 5.2.6)
- 26 (paragraph 5.2.14)
- 27 (paragraphs 5.2.20-23)
- 30 (Figure 29)
- 31 (Table 2)
- 32 (paragraph 5.3.12)
- 36 Figures 39/40
- 39 Figure 44
- 40 (paragraph 5.5.39)
- 41 (paragraphs 5.5.42-43)



## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2041. It is thorough and distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following the independent examination of the Plan, I have concluded that the Warborough and Shillingford Neighbourhood Development Plan Review meets the basic conditions for a neighbourhood plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report, I recommend to South Oxfordshire District Council that, subject to the incorporation of the modifications set out in this report, the Warborough and Shillingford Neighbourhood Development Plan Review should proceed to referendum.

### *Referendum Area*

- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the submitted Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 1 March 2016.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner. The responses to the clarification note were comprehensive.

**Andrew Ashcroft**  
**Independent Examiner**  
**26 November 2025**