

John Slater Planning

Blewbury Neighbourhood Plan 2016-2031

Submission Version

A Report to Vale of White Horse District Council on the Examination of the Blewbury Neighbourhood Development Plan

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The Examination of the Blewbury Neighbourhood Development Plan

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Introduction

Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the Vale of the White Horse Local Plan 2011. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

The neighbourhood plan making process has been led by Blewbury Parish Council. A Steering Group was appointed to undertake the plan preparation made up of Parish Councillors and lay members. Blewbury Parish Council is a “qualifying body” under the Neighbourhood Planning legislation.

This report is the outcome of my examination of the Submission Version of the Blewbury Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum, the Plan will be “made” by Vale of the White Horse District Council, which is the Local Planning Authority for the neighbourhood plan area,

The Examiner’s Role

I was formally appointed by Vale of the White Horse District Council in August 2016, with the agreement of the Parish Council, to conduct this examination. My role is known as an Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service which is administered by the Royal Institute of Chartered Surveyors (RICS)

In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 38 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Vale of the White Horse District Council, and Blewbury Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

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Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the plan should proceed to referendum on the basis that it meets all the legal requirements.
- That the plan should proceed to referendum if modified
- That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

Furthermore, if I am to conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of area covered by the Blewbury Neighbourhood Development Plan area.

In examining the Plan, the Independent Examiner is expected to address the following questions

- a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
- b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
- c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

I am able to confirm that the Plan, if amended in line with my recommendations, does relate to the development and use of land, covering the area designated by Vale of the White Horse District Council, for the Blewbury Neighbourhood Plan on 7th March 2014.

I can also confirm that it does specify the period over which the plan has effect namely the period between 2016 and 2031.

I can confirm that the plan does not cover any “excluded development”.

There are no other neighbourhood plans covering the area covered by the Plan designation.

Blewbury Parish Council as a parish council is a qualifying body under the terms of the legislation.

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The Examination Process

The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.

I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

I am satisfied that I am in a position to properly examine the plan without the need for a hearing. No parties have requested a hearing.

I carried out an unaccompanied visit to the Blewbury Parish and the surrounding area on 20th August 2016 to familiarise myself with the village and the wider plan area.

The Consultation Process

The steering group was formed in 2013 prior to the designation of Blewbury as a neighbourhood area.

The composition of the steering group changed during the process, reflecting changes in the membership of the Parish Council and the time availability of individuals. In total 20 people participated as members of the steering group. The plan was launched at an event, held the day after the designation was confirmed. The steering group held monthly meetings, which were open to the public and the work of the group was communicated via the monthly village magazine, plus through the group's own website and Facebook pages.

A housing need survey was carried out in the autumn of 2014 which generated a commendable 61% response rate. Between May and July 2015 focus groups were held covering a number of key areas and I was particularly impressed that a separate session was held to gather the views and understand the concerns and priorities of children and young people, between 11 and 16 years of age.

Another open public session was held in November 2015 where the results of the housing needs survey and the landscape character assessment were shared with the village, and emerging priorities and policies were discussed.

The final event was held on 7 February 2016, which brought the final update on the draft plan. This was part of the six-week consultation on the Pre Submission version of the plan – this is known as the Regulation 14 consultation. This period ran between 1 February 2016 and 14th March 2016. As well as making the draft plan and

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a Frequently Asked Questions document available, the group produced and distributed a Summary Version to every house in the village. In addition, the Group offered three other informal opportunities to allow residents an opportunity to comment.

A total of 41 representations were received from the public plus 5 specific comments from statutory consultees. There was overwhelming support for the main themes of the plan which were to maintain and preserve the character of the village in its AONB setting.

Regulation 16 Consultation

I have had regard, in carrying out this examination, to all the comments made during the period of final consultation which took place for a 6-week period between 16th June 2016 and 28th July 2016. This consultation was organised by the Vale of the White Horse District Council who had received the Submitted Plan, prior to it being passed to me for its examination. That stage is known as the Regulation 16 Consultation.

In total 6 responses were received. These were from the Environment Agency, Highways England, Historic England, Natural England, and Network Rail, plus one email from, I presume to be, a local resident making some detailed comments about the contents of the Landscape Assessment, which, whilst it is part of the evidence base, is not the document that is subject to this examination. All the other representations either offer no comments or support the plan apart from Network Rail who ask for a policy to ensure developers contribute to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development. In view of the fact that the neighbourhood plan is not making any residential allocations, then this is not a matter that I consider relevant to this plan.

Compliance with the Development Plan

To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Vale of the White Horse Local Plan 2011 adopted in 2006. This is now in many respects, out of date, as it predates the National Planning Policy Framework (NPPF).

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The Vale of the White Horse DC is currently in the process of preparing the new local plan. This will be in parts. The First Part dealing with strategic sites and policies has been through its public examination and the Inspector has published his Interim Findings. At the present moment, the Vale is consulting on a Schedule of Main Modifications. Once this plan is adopted then work will commence on the Part 2 document, which will deal with detailed policies and local sites.

Blewbury is designated a larger village in the settlement hierarchy, within the South East vale Sub Area. No new housing is allocated in the emerging plan for Blewbury and the emerging policy is that development will be limited to providing for local needs and supporting local services and facilities.

Compliance with European and Human Rights Legislation

The Parish Council requested the Vale of the White Horse District Council to screen whether the of the Blewbury Neighbourhood Development Plan should be the subject of a Strategic Environmental Assessment (SEA) as required by EU Directive 2001/42/EC which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”.

Vale of the White Horse DC confirmed on 2nd June 2016, having consulted with the three statutory consultees, to the effect that an SEA was not required and I have been sent a copy of that screening opinion. I am satisfied that the District Council’s conclusion is sound.

I understand that there are no European protected sites in close proximity to the Plan area and therefore it was not necessary for an Appropriate Assessment under the Habitats Regulations to be prepared.

I have received no representations that there is any incompatibility with the European or Human Rights legislation and I am satisfied that this element of the Basic Conditions test is met.

The Neighbourhood Plan: An Overview

This neighbourhood plan is a particularly well written document, which paints a comprehensive picture of Blewbury today as well as providing the basis of guiding new development over the next 15 years. The plan has clearly being based upon an excellent evidence base, primarily comprising the Housing Needs Survey, the Landscape Character Assessment and the Village Character Assessment. All three documents are of the evident quality being prepared to the highest professional

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standards.

My only criticism of the document itself relates to the volume and extent of the supporting information that precedes the development plan policy chapter. The total plan comes to 73 pages, but the land use policies, which are at the heart of the neighbourhood plan do not start until Page 54 and cover 12 pages. In the future, anybody who wishes to interrogate the neighbourhood plan, to use it to make development management decisions could be very daunted by 50+ pages of supporting prose. This is not a matter that in any way affects my examination of the plan, but the plan's authors may be wise to consider preparing a concise, land use planning document, setting out the policies in the plan but with a separate accompanying document containing the extensive preamble, which whilst giving a good understanding of Blewbury, involves a significant investment in time and printing! This is entirely a matter of the Parish Council to consider and does not feature in any of my recommendations.

The plan itself is focussed on what is relevant to Blewbury and is related, in the main, to addressing genuine planning issues. It has been guided by a clear understanding of the character of the village and the surrounding countryside. It is obvious that the plan has been drawn up in close discussion with the Vale of White Horse planners and in my experience it is highly unusual for the LPA not to have to make any representations to the examiner, at Regulation 16 stage. I am reassured that this is due to them having been able to work collaboratively and cooperatively with the steering group, during the neighbourhood plan's preparations.

The plan has not been required to make any residential or employment allocations. The policies are there to guide development proposals and are realistic but recognise the local distinctiveness of Blewbury as a village. It is clear that the village values its built environment and its stunning landscape setting. The plan has clear public support. It recognises that windfall development will continue to come forward but these will be judged against pragmatic, realistic policies that will ensure that the development that will take place enhances the village.

The Neighbourhood Development Policy

Policy P1- Location of Residential Development

One of the basic conditions that I have to have regard to, is the relationship to Secretary of State advice. One of the requirements set out in the section of the Planning Practice Guidance is that neighbourhood plan policy "should be clear and unambiguous". I believe that the use of the word "may" used in the context of whether planning permission is to be granted, when a proposal meets the policy requirements, introduces an element of uncertainty in the decision making process.

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Paragraph 16 of the NPPF requires that neighbourhood plans “should plan positively to support local development”. I therefore propose to substitute “**will** be permitted” rather than “**may** be permitted.”

My second concern is that a plan should not seek to accommodate or indeed fetter future development planning. Any future proposals that promote a different policy or allocate land, whether it be via a local plan or a revised neighbourhood plan, will at that point, having gone through its statutory stages, be the development plan. It is therefore unnecessary and indeed undesirable, to make provision for future policy.

The policy seeks to define the extent of the built up area by virtue to a description of the boundaries. In the normal course of events I would expect to see the extent of the built up area defined by a line on the Plan. However, upon making enquiries I understand that that is not the policy and practise in the Vale, either as part of the Local Plan or in neighbourhood planning, as the planning department consider it too restrictive and inflexible. I have considered whether to make a recommendation on that point but I am satisfied that there is sufficient guidance in the policy to allow judgement, at the development management stage, as to whether sites lie within and outside the built up area boundary.

Recommendations

In paragraph 1. Delete “may” and insert “will”.

In paragraph 2. Delete everything in the sentence after “Rural Exception Sites”.

Policy P2 – General Principle for Development

Again the issues of certainty relating to the use of the word “may” apply equally to this policy as Policy P1. I will be making the same recommended change.

In terms of the last criterion, the policy refers to the proposals for safeguarding the amenities of “land owners”. Planning controls do not necessarily seek to protect the amenities of landowners, but the amenities of all occupiers, irrespective of the tenure of the residents.

Recommendations

In the first sentence, delete “may” and insert “will”.

In criteria 7 delete “land owners” and insert “occupiers”.

Policy P3 – Housing Mix

I am satisfied that it is appropriate for planning policy to “identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand”. I have been impressed by the quality of the assessment of housing need carried out as part of this neighbourhood plan, which, in my judgement, justifies the inclusion of a policy to rebalance the size of housing units built within the village. I

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also believe that the wording of the policy provides a degree of flexibility on the smaller developments, which will ensure that the desired need for smaller dwellings will be realised. As such, I believe the policy meets basic conditions.

Policy P4 – Internal Space Standards

I do not accept the statement in the Plan that “qualifying bodies such as parish councils preparing neighbourhood plans are permitted to require an internal space standard in reference to Nationally Described Space Standards”. The reference in the footnote to the Planning Practice Guidance states “where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their **Local Plan** to the Nationally Described Space Standard.”. Furthermore, the Secretary of State’s Statement to the House of Commons dated 25th March 2015, which introduced the national internal space standards, states categorically “neighbourhood plans should not be used to apply the new technical standards”.

Recommendation

The policy be deleted.

Policy P5 – Provision for Affordable housing

This requires the provision of affordable housing to be in accordance with the Local Plan. This is set out in Policy H17 of the adopted Local Plan. For a settlement of the size of Blewbury that on developments of 5 or more units then 40% should be affordable units. This is no longer in line with national policy, which has been reintroduced, following the Court of Appeal judgment made in respect of West Berkshire District Council and Reading Borough Council V Secretary of State for Communities and Local Government, and which states that affordable housing should not be sought on developments of 10 units or less.

Recommendations

Insert after “residential development” “comprising a net increase of eleven units or more”.

Policy P6 – Allocation of Affordable Housing

The conclusions of the housing needs assessment are such as there is clearly a need for affordable housing within the plan area. I therefore consider that the evidence justifies the 20% requirement to local needs. I have not received any representation on behalf of the Council which also acts as housing authority that they are unhappy with this percentage. Accordingly, I conclude it meets the basic conditions test.

Policy P7 – Design and Aesthetics: New Development

In terms of the details of the policy, I cannot see how a building’s material can “add to the quality or character of the surrounding development” compared to the quality

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of design. I believe that it is important that the materials should be appropriate to the area. I cannot see how a planning application can be judged on the basis that its materials *add* to the quality of the environment although inappropriate materials can, importantly, detract from the character of an area.

Similarly, the application of flexibility with regard to exceptional, innovative designs should not be discretionary in accordance with paragraph 63 of the NPPF.

The final part of the policy requires an applicant to submit a Design and Access Statement or explain in writing how they have incorporated the principles set out in the policy. All applicants for new buildings, until recently, had to be accompanied by a Design and Access Statement. That was the situation prior to the changes introduced by the Town and Country Planning (Development Management Procedure) (England) Order 2015, which limited the requirement for the submission of Design and Access Statements to *major* schemes, which in terms of residential schemes is 10 units or more, except within the Conservation area where the threshold reduces to individual houses. The burden of providing that justification has been lifted in respect of documents called Design and Access Statements and I cannot justify imposing the requirement for another form of written submission.

Recommendations

Delete “add to the quality or character of” and insert “be appropriate to”

In the second paragraph delete “should” and insert “will”

Delete the final paragraph

Policy P8- Design and Aesthetics: New Development, and Alterations or Extensions to Historic Buildings

The title of the policy could mean that the intention of the policy could be confused with that used in Policy P7. I believe the title should clarify that it relates to “new development in a historic setting – this will cover both the village’s historic buildings and also the Conservation Area and new development that could affect their respective settings.

It is quite appropriate for neighbourhood plans to include policies that deal with heritage and conservation issues. However, it is important to be clear where the extent of the policy applies. From my reading of the policy, it relates to development affecting listed buildings and their setting, and the conservation area and its setting.

However, the second numbered point refers to preserving or enhancing the “character of traditional buildings”. The plan does not define what is meant by a traditional building either in the plan or its glossary. I think that there is the potential for real confusion as to whether an application relates either to or the setting of a traditional building. Is it any old building or a building of traditional construction?

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Many neighbourhood plans take the opportunity of designating some buildings as non-designated heritage assets, which have a specific status accorded to them in the NPPF. There are buildings that are not of quality that warrant listing in their own right but contribute to the quality and distinctiveness of the area. This plan has not gone down that route.

However much of the historic buildings and what may be thought of as “traditional buildings” lie within the extensive Conservation Area. When I made my visit I specifically looked for the extent of non-listed buildings that lay outside the Conservation Area and there were not many that might be considered heritage buildings and indeed a number of these could be described as lying within the setting of the Conservation Area. There is already a requirement that proposals should preserve or enhance the Conservation Area. I therefore will, because of my concerns about the uncertainty of what constitutes a traditional or non-traditional building, recommend the deletion of the second criterion. For those buildings that are listed or in the Conservation Area, any planning application will be required to preserve or enhance the protected buildings.

My other point of concern relates to the penultimate criterion which requires the use of the “guiding principles set out in section 7.3 of the plan”. The text states that these are “sound principles for the repairing of and insulating historic buildings”. Planning permission is not required for repair of buildings and listed building consent is only required if the special character of the building is affected. Applications for works to listed buildings are considered against the statutory requirements set out in section 16 of the Planning (Listed Building and Conservation Areas) Act. These are different tests to that which would apply to planning applications, where the decision makers are required to have regard to the development plan and material considerations. Whilst the advice set out in this section 7.3 may be appropriate and good advice, it does not fall within the policy regime that a neighbourhood plan sets. Such matters as, for example, draft proofing and the breathability of insulation are better left to specialist advisors and guidance, rather than development plan policy.

Design and Access Statements accompanying listed building consent applications are required to explain the design principles and concepts that have been applied to proposed works and show how they have taken account of the special architectural or historic importance of the building and the physical features of the building that justified its designation as a listed building.

Recommendations

Retitle policy: Design and Aesthetics: New Development in an Historic Setting and Extensions to Historic Buildings.

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Delete the second and the eleventh criteria.

Policy P9 Amenity: New Development

The first set of criteria represents sound development management considerations. I do have reservations regarding the blanket requirement for 10+ unit schemes to provide spaces for children to play. Whilst such a requirement is clear for any scheme that is for family accommodation, I do not consider that such a provision is necessarily justified in schemes incorporating one-bedroom units. I therefore propose to recommend the requirement be imposed on schemes which contain a net increase of 10 or more two bedrooms or larger dwellings.

Recommendation

In criterion 2, insert after “and over,” “which comprise dwellings with two or more bedrooms shall”.

Policy P 10: Natural Environment

The policy requires, in all cases, the agreement of a landscaping scheme before works commence. This is a matter that is ordinarily dealt with by the imposition of planning conditions, which are considered against the specific circumstances of the development and the six tests that a planning condition should meet. The policy imposes the requirement on **all** development, but there will be some developments where it is not appropriate to impose a landscaping condition, for example on changes of use or residential extensions. Furthermore, the government is seeking to reduce the numbers of what are known as *condition precedent* on planning consents i.e. where work cannot commence lawfully until the condition has been discharged. If the condition does not meet the six legal tests, then it will be unenforceable. As such it is my conclusion that this is really not a matter that should be set out rigidly as neighbourhood plan policy. I will therefore recommend the deletion of this part of the policy.

In terms of the second element to the policy, there will be some developments which do not need to incorporate boundary treatments. I appreciate the objective of attempting to limit the height of means enclosures, however in many cases it will be that householders can erect fences up to 2 m in height on their property, behind the highway, without needing planning permission. I saw a lot of these on my site visit.

Recommendations

Delete everything before criterion 2

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In criterion 2, after “all developments” and insert “that require the establishment of new boundary shall incorporate, where possible,” and delete “to have boundary”.

Policy P 11: Sustainable Development

Whilst the policy seeks to *encourage* rather than *require* housing to be rated as three stars or above on the Home Quality Mark, I still believe that the encouragement to achieve this technical standard would be contrary to Secretary of State advice. In his Written Ministerial Statement to House of Commons dated 25 March 2015 he stated clearly “LPAs and qualifying bodies preparing neighbourhood plans,... should not set ...any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”. Whilst there is much to commend the standard, I believe it is very much more aimed towards the housebuilding industry, rather than as a requirement for planning authorities to impose.

I do see value in asking applicants of major residential schemes, i.e. over 10 units, how their scheme relates to the 12 criteria set out in the Building for Life quality mark. That can be done within the Design and Access Statement and is not a matter that would be contravened by the Secretary of State’s Written Statement.

Recommendation

Delete all text from the start of the policy to the start of the second requirement i.e. Beginning “all new housing....”

Delete the final paragraph of the policy and insert “Applications for developments over 10 units must show in the Design and Access Statement how their design responds to the principles set out in The Building for Life 12 Guide”.

Policy P 12: Water Management

I consider that this policy is in line with government advice and meets the basic conditions. No changes are necessary.

Policy P 13 Drainage and Flooding

The evidence is clear that the area has suffered from and continues to experience issues with groundwater flooding and I consider that the policy is justified and in line with national advice.

Policy P 14: Access and Movement

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Again this is a policy accords with national and local plan policy and meets basic conditions.

Policy P 15: Highways and Traffic Principles

In terms of providing the certainty that plan policy is required to give, I am unsure what test would be applied by the decision maker, when considering a development proposal, as to whether it will “maintain a peaceful and safe rural parish”. As this test vague and non-specific, that part of the policy is recommended for deletion.

I believe that the part of the second element of the policy dealing with traffic calming measures, relates more to the activities of the highway authority rather than being a matter that will be covered by planning application. I therefore conclude that it fails the test of being a policy relating to the “use and development of land” and is rather a policy dealing with highway management. Equally the replacement of street furniture and signage is a highway matter, rather than something that requires planning consent. These two elements whilst recommended to be removed from the development plan, can still be referred to within the community issues section of the document.

Recommendations

Delete “and the standards required to maintain a peaceful and safe rural parish” and insert “and “between “infrastructure “and “road safety”.

Delete the first sentence of criterion 2.

Delete all of criterion 3.

Policy P 16: retail space, business space, restaurants and cafes.

I applaud this policy which will help maintain vitality of the village. My only concern is the extent of to how the policy will be applied created by the caveat “if appropriate”. It would be helpful if the policy were to refer to the need to comply with “other policies in the development plan” which could allow the considerations of such issues as residential amenity and parking. The remainder of the policy meets basic conditions.

Recommendation

Delete at the end of the first paragraph “if appropriate” and insert “subject to compliance with other policies in the development plan”.

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Policy P 17: Public Houses

The NPPF recognises the value of public houses to the community in rural areas. The policy will not however necessarily protect any public house from changes of use unless it is designated as an asset of community value. No changes are required as it meets basic conditions.

Policy P 18: Community Assets

I consider this policy means basic conditions and no alterations are required.

The Referendum Area

If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance I can confirm that the area of the Neighbourhood Plan as designated by Vale of the White Horse District Council on 7th March 2014 is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

From my reading of the Plan and the accompanying documents I gained a clear picture as to why the residents of Blewbury felt they lived in such a special place. This was reinforced by my visit to the village, when I was able to walk along the footpaths, between the cob walls and appreciate and understand the unusual layout of the Conservation Area and take in the variety of historic buildings. Blewbury is a picturesque village of the highest quality, set in the magnificent Area of Outstanding Natural Beauty. Whilst I have had to make recommendations that require some changes to the drafting of the policies and in some cases have had to recommend that policies be deleted, for example, where they do not relate to policies for the use and development of land, nevertheless the overall objectives of those preparing the plan remain intact. Similarly, some of my recommendations have arisen due to changes in the national picture, that may have come about as work on preparing the plan has progressed. This should not in any way be taken as not recognising or undermining the hard work that has gone in to the document and the commissioning of supporting, well informed and relevant evidence, much of which is of the highest quality.

Finally, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.

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I am therefore delighted to recommend to the Vale of the White Horse District Council that the Blewbury Neighbourhood Development Plan, as modified by my recommendations, should now proceed to referendum.

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25th August 2016