

Dear Mr Jordan

We are writing further to our letter dated 16 October 2020. Unfortunately, your response of 21 October 2020 has only served to deepen our concerns. In the interests of openness, we intend to put forward all the issues we have to date in the following letter. For the avoidance of doubt, we object both to the decision of the first stage consultation and the way it has been reached.

From the very outset, we have felt that CDC has only reluctantly engaged with the CGR and has largely excluded WARA from the process. Upon our submission of a valid petition, we were told by Yvonne Rees that she was turning down our request as we did not have the 250 signatures required by law. WARA was forced to point out that the legislation in fact requires only 187 signatures. CDC eventually accepted its mistake but then claimed that some signatures were invalid, while refusing to tell us which signatures, or why.

The government guidance on CGRs at paragraph 20 explicitly says that local people will be able to influence the terms of reference. Despite this, CDC refused our request for involvement in setting the terms of reference and only reluctantly agreed to allow WARA to see the terms of reference once they had already been set, one day before publication:

*“In relation to your earlier email regarding the Terms of Reference I am content to provide you with a draft of these terms for comment before these are formally put before Full Council for approval. I cannot give you any assurance that any comments will be taken on board” – Nick Graham, 24 April 2020.*

To be clear, the petition signed by almost 200 West Adderbury residents and submitted by WARA requested:

*“A Community Governance Review in accordance with the Local Government and Public Involvement in Health Act 2007, Part 4, Chapter 3, Section 80, **the Review to relate to the area outlined in purple on the attached maps ... which previously formed the separate parish of West Adderbury**”.*

Rather than reproducing the actual words used in the petition (above), for reasons which we do not understand, CDC chose to **delete** the words “West Adderbury” and to replace them with the much broader term “parish matter”:

*“Cherwell District Council has received a valid petition from West Adderbury Residents Association, requesting that a Community Governance Review (CGR) be carried out pursuant to Part 4, Chapter 3 of the Local Government and Public Involvement in Health Act 2007 to consider the following **Parish matter**”.*

**CDC were petitioned to review the governance arrangements of West Adderbury. Instead, without explanation or justification, CDC appears to have deliberately chosen to review the governance arrangements of the existing parish of Adderbury.**

The refusal to recognise West Adderbury as the subject of the CGR seems to us to be related to CDC’s apparent view of WARA as nothing more than a small group of troublemakers rather than as a legitimate residents’ association representing a significant portion of West Adderbury.

For example, on 28 May 2020 Sarah Stevens (Interim Senior Manager at CDC) referred to the Adderbury application (19/02796/F) as being “*somewhat sensitive – not to us in straightforward planning terms but rather has been caught in the middle of the hornets nest stirred up by the West Adderbury Residents Group and the Governance Review they have requested. The WARG has been writing to everyone and anybody ...*” [Ms Stevens ellipsis]. Other documents obtained in an FOI request refer to “nipping this in the bud”.

Interestingly, Ms Stevens links the CGR with a contentious planning application, a claim repeated by District Councillor McHugh both at the planning meeting on 4 June 2020 and the council meeting on 19 October 2020.

WARA raised concerns with CDC that the consultation questionnaire was not designed to elicit evidence relating to the issues raised by West Adderbury residents in the petition, and subsequently included in the terms of reference. Notably, CDC made no attempt to determine which were the views of West Adderbury residents i.e. people living in the area under review rather than those of other parts of the parish or even the wider community. CDC has consistently maintained that it is CDC’s sole right to design and manage the CGR process.

As soon as we became aware that the Working Group had submitted a report for the Council meeting on 19 October 2020, we wrote to CDC to raise a number of concerns. Firstly, we noted that report does not explain how or why the Working Group has reached its conclusions and we asked for further information, documentation or justification. Secondly, we pointed out our concern that - based upon the report - the Working Group did not appear to have followed the law or guidance. Finally, we asked that the Council should not rush to a premature judgement by denying re-establishment of West Adderbury parish council part way through the CGR process. We emphasised the need for further dialogue on the issues raised in the petition, during the consultation and within the Working Group’s report. Our concerns were ignored.

In the 19 October 2020 Council meeting itself, CDC ploughed ahead with its decision, despite all councillors having been made aware of our concerns. In a mere 16 minutes, the Working Group’s report was presented, voted on and the recommendations accepted. There was no debate. Three members of the Working Group, including the Chair who presented the report, spoke, but they added nothing by way of explanation or justification for their decision and merely restated the contents of the report.

Councillor McHugh spoke, but only to once again claim that the CGR was in fact a thinly veiled attempt to derail a planning application which has already been approved. Councillor McHugh also falsely stated that on multiple occasions 75% of the (entire) parish had voted in favour of this application, and that the CGR was therefore a waste of time and money. Councillor McHugh appeared to misunderstand the process and seemed to think that he was being asked to vote on carrying out the CGR, when it is in fact already in progress. As ward councillor for Adderbury, Councillor McHugh’s highly misleading comments, made minutes in advance of the full Council vote, were unacceptable.

Councillor Richards was the only other non-Working Group member to speak. He said that he did not want to get involved in the debate, as “*it seemed to be a squabble between two halves of the village*”.

No other Councillor spoke. To add insult to injury, a prior motion on badger culling – which by the Council’s own admission was a moot point because CDC owns no land on which badgers could be culled – was vigorously and thoroughly debated for over 70 minutes. It is extremely disappointing for West Adderbury residents that CDC appears to have more concern for badgers than for the democratic future of an entire village.

WARA is left with the overwhelming impression that CDC has not taken the CGR seriously and does not believe that the residents of West Adderbury have legitimate concerns. CDC appears to have a hostile stance towards WARA, viewing us as a single-issue group, with ulterior motives for requesting a CGR. At best, CDC appear to think the issues raised in the petition amount to no more than “a squabble” between parishioners.

This impression is reinforced by your response to our concerns. You state that the further information and explanation we requested could be found in the video recording of the debate. As we have pointed out, the only relevant contribution came from three Working Group members who briefly restated the contents of the report but provided no further justification. You also restated CDC’s evident belief that this CGR process is owned by the District Council and that we are at best to be tolerated as bystanders rather than as active participants.

It is clear from the White Paper and the guidance on CGRs that the 2007 Act is intended to improve the development and co-ordination of support for citizens and community groups so that they can make the best use of empowerment opportunities. We feel far from empowered by CDC’s continuing refusal to allow WARA shared ownership of the CGR.

Your response that we will be allowed to make any comment we wish in the second stage of the consultation suggests an openness on the part of CDC which is directly contradicted by a statement made in the council meeting. The Chair of the Working Group emphatically stated “*To be absolutely clear, the second consultation which we have to have by law will be on warding or the number of councillors. It will not be another consultation on separation. That has already been decided, especially if the council agrees the recommendations set before you*”. CDC makes a mockery of its own Terms of Reference which includes a two-stage dialogue about the issues. The point of the first stage was surely to identify the issues which could then be explored in detail in the second stage consultation, and not to allow a pre-emptory dismissal of the petitioners’ request without any right of reply.

The following is based on your confirmation that there is no further documentation relevant to the Working Group’s recommendation, or discussion of the concerns we raised, other than the Working Group’s report and the statements made at the Council meeting on 19 October 2020.

The law requires that a council undertaking a CGR **must have regard to the need to secure that community governance within the area under review:**

**(a) reflects the identities and interests of the community in that area, and**

**(b) is effective and convenient**

The council must also have regard to **any other arrangements already made for community representation or engagement in respect of the area under review.**

It is clear that CDC has taken “*the area under review*” to be Adderbury parish, and not West Adderbury.

This is evidenced by the references in the Working Group report to the “*Community Governance Review for Adderbury*”, and to the reasons for the Working Group’s conclusions which are given in terms of the “*identity of the village of Adderbury*” and the “*parish of Adderbury*”. The only time West Adderbury is mentioned in the report is as a unit of representation within the larger parish. There is nothing in the written or verbal report of the

Working Group that recognises West Adderbury as a separate village with its own identity, needs and interests, despite explicit reference to this in the petition.

In failing to recognise that West Adderbury has an identity and interests that differ from those of the rest of the parish, CDC have failed to have regard to the need to secure that community governance within West Adderbury reflects the identities and interests of the community of West Adderbury.

CDC's questionnaire made no attempt to distinguish between responses from West Adderbury and other parts of the current parish, or indeed from outside the parish. In drawing its conclusions, the Working Group has given equal weight to all responses. While it is right and proper to have regard to the views of interested and affected parties, the law is clear that governance must reflect the identities and interest of the West Adderbury community.

In determining whether a community has its own identity, the guidance is clear at section 50 that *"a parish should reflect a distinctive and recognisable community of place, with its own sense of identity. The views of local communities and inhabitants are of central importance"*. Section 52 further states that *"It is clear that how people perceive where they live – their neighbourhoods - is significant in considering the identities and interests of local communities and depends on a range of circumstances, often best defined by local residents"*.

The following comments made during the consultation specifically relate to the separate identity and special character of the community of West Adderbury, as distinct from East Adderbury or Twyford, and raise issues as to whether a single parish council is capable of representing three communities with conflicting interests:

*"I grew up in Adderbury and feel that the village has grown quite significantly. It is a long village with different identities. Having a separate West Adderbury Parish Council would give West Adderbury the say on its own future and I think would serve the community well"*.

*"As a resident of West Adderbury, I believe we need our own parish council to provide the services West Adderbury needs and to give West Adderbury a say in its own future. We need to be able to preserve the character of our community and reflect the wishes and identity of West Adderbury"*.

*"The existing parish is too big, incorporating too many divergent areas that have different interests"*.

*"It is clear the Parish is divided as the interest of one half of the parish are very different to the other"*.

*"A single parish council cannot meet the needs or reflect the identity and interests of the two geographically and socially distinct villages in the current parish. I do not identify with "Adderbury" but with West Adderbury"*.

*"West Adderbury needs governance to be reflective of the Identity and interests of its community which the present Parish Council does not"*.

*"I believe it will make a more harmonious village, We seem to be very distant to the people of Twyford, and have different needs"*.

*"The Adderbury parish has always had a natural divide into 'West and East Adderbury' and 'Twyford Adderbury'. These are very different areas, with different history, demographics, architectural style and local priorities. This has created great tension in the village due to competing interest and has caused dysfunction within the parish council"*.

*“As the village has grown large, it makes sense to have two parishes to represent the voice of each growing community with recent new homes build.”*

*“APC can't meet my needs because they represent diverse villages/communities. I don't feel that I have a say in my future but would do under WAPC. I feel no sense of belonging with APC but do as a West Adderbury resident. I don't feel that I have any influence over the way my community develops but would do under WAPC”.*

Despite these and many further comments, and the explicit statements in the petition, CDC has failed to recognise the separate needs and identity of West Adderbury. Instead, CDC has mischaracterised the concerns of the petitioners as a simple lack of representation, as evidenced by Councillor Reynold's statement at the Council Meeting on 19 October 2020:

*“The Working Group looked at the concerns of the 181 people who supported separation. **The group felt that the real problem was the feeling that they were not being represented by the parish council** despite the fact that they always had a pretty good number of councillors who lived in West Adderbury”.*

This mischaracterisation of the issues is repeated in the report, which states that consultees in favour of splitting the parish had three main concerns:

- *The need for West Adderbury to have its own voice*
- *West Adderbury being under-represented due to a low number of residents from West Adderbury being elected or co-opted on to the current parish council*
- *Dissatisfaction with decision made by existing parish council*

The Working Group has decided to ignore the statements agreed to by the almost 200 residents who signed the petition. These were firm statements of local opinion that APC is incapable of adequately representing the two geographically and socially distinct villages of West and East Adderbury, which have incompatible needs and interests. Instead of considering this key issue, clearly expressed within the petition, the Working Group has decided that the “real problem” is a lack of representation on the current parish council. The Working Group appears to think that it has a better understanding of the beliefs and needs of West Adderbury residents than the petitioners themselves.

Where petitioners have already expressed views about what form of community governance they would like for their area, the principal council should tailor their terms of reference to reflect those views. Although CDC included the bullet point statements summing up the petitioners' views in the terms of reference, the Working Group has completely disregarded them, contrary to its legal obligation.

West Adderbury is a minority within the larger parish of Adderbury, the “poor cousin” of East Adderbury as one consultee put it. Simply increasing or mandating the number of parish councillors who live in West Adderbury does not alter the fact that West Adderbury will remain a minority. Where the needs and interests of West Adderbury conflict with those of the rest of the parish, the Parish Council has no choice but to sacrifice the needs of West Adderbury to those of the majority.

When we say that West Adderbury does not have a voice, it is not because we are not allowed to speak; it is because Adderbury Parish Council is not allowed to listen.

In other words, “A single parish council cannot meet the needs or reflect the identity and interests of the two geographically and socially distinct villages in the current parish”.

In failing to recognise that West Adderbury has an identity and interests that differ from those of the rest of the parish, CDC has also failed to have regard to the need to secure that community governance within West Adderbury is effective and convenient for the community of West Adderbury.

The CGR guidance states that: *“The effectiveness and convenience of local government is best understood in the context of a local authority’s ability to deliver quality services economically and efficiently, and **give users of services a democratic voice in the decisions that affect them**”*.

The Working Group appear to misinterpreted this guidance as relating purely to the potential costs of services, and have further considered only the parish as a whole and not the “area under review”. For example, the references in the report and verbal statements of the Working Group refer only to the “existing parish”.

We note that in referring to *“Disproportionate costs on residents in the event of a separation”* the Working Group contradict CDC’s own statement in the pre-consultation letter to residents, which said *“Will the amount of Council Tax I pay change? It might do. If the split goes ahead, both Parish Councils would need to decide how much money they need to raise via their precepts, collected as part of your Council Tax bill, to help run their respective parishes. Therefore, whichever parish you live in, your Council Tax bill could go up or down”*.

If the Working Group maintains that cost savings to Adderbury parish outweigh the right of West Adderbury residents to have effective and convenient governance, by having a democratic voice in the decisions that affect them, it should provide some justification.

Further, the Working Group has given no weight to the comments from consultees who believe that the current governance arrangements in West Adderbury are not currently “effective and convenient”, as illustrated by the following examples:

*“We need our own parish council to preserve the special character of our community, to reflect the wishes and identity of West Adderbury residents, to provide the services West Adderbury needs, and to give West Adderbury a say in its own future. I am therefore asking Cherwell District Council to reinstate West Adderbury Parish Council”*.

*“The current parish council are ineffective. We have contacted counsellors on numerous occasions with no response”*.

*“I am concerned that West Adderbury does not get fair representation as the biggest population live in East Adderbury and Twyford”*.

*“In recent years decisions affecting West Adderbury have mainly been steered by those in East Adderbury. There is a marked escalation of speeding traffic through WA & in spite of many requests & a survey, nothing meaningful has been put in place”*.

*“I believe splitting in to 2 council's will serve the interests of the people in the area in a more productive way. Presently the council is not addressing the needs of the conservation area of Adderbury or its specific goals”*.

*“As a resident of Adderbury for over 20 years I believe this move to be a positive step forward, it will give West Adderbury it's own voice with an ability to provide the services, etc the residents actually want as a matter of urgency, without having to endure the ongoing stalling tactics of the current Adderbury PC”*.

*“We need to have what is right and important at our part of the village”.*

The guidance further states that *“Effective and convenient local government essentially means that parish councils should be viable in terms of providing **at least some local services**, and if they are to be convenient they need to be easy to reach and accessible to local people”.*

In stating that separation of the parish was *“not a viable solution”* and that *“there is concern over the sustainability of separate parishes”*, the Working Group has failed to recognise that West Adderbury parish historically managed to provide these services. Moreover, the majority of the services currently enjoyed by the parish of Adderbury were successfully shared for many decades between West and East Adderbury Parish Councils. The Working Group’s statement that *“Community services in the existing parish being well used by all residents, possibly making ongoing running of these services impractical if it were done across two parishes”* is given no support and does not appear to take into account the previous situation.

There is no rational justification for the Working Group’s claim that separate councils would not be viable, other than Councillor Reynold’s entirely unsupported statement that *“two councils would be more expensive for rate payers for the obvious reasons of running costs for two councils and two clerks. Parish Councils nowadays are much changed and there is a lot more work, laws they have to look to, so they both need to have well advised well trained clerks and so need a fair amount of money to set up”.*

CDC has also failed to “have regard to any other arrangements already made for community representation or engagement in respect of the area under review”.

The guidance states that *“Principal councils must consider the wider picture of community governance in carrying out their reviews. In some areas there may be well established forms of community governance such as local residents’ associations, or community forums which local people have set up and which help make a distinct contribution to the community ... In undertaking a review, section 93(5) requires principal councils to take these bodies into account. Potentially, as representatives of their community, these bodies may be considered as foundations for or stages towards the creation of democratically elected parishes”*

The Working Group’s report and verbal statements do not address the existence of WARA as a residents’ association which could form a foundation for a parish council. In particular, when referring to the potential viability of a separate parish council, the Working Group has not considered that such a council would not need to be set up “from scratch”; the WARA membership includes several ex-parish councillors and other very qualified individuals.

Instead of applying the two principle criteria laid down in law, or the interpretation of those criteria as set out in the guidance, CDC has effectively carried out a poll.

The Working Group report leads with the absolute number of votes and the percentage in favour and against separation of the parish. In his statement at the Council Meeting on 19 October 2020, Working Group Chair Councillor Reynolds also began with the number of “yes” and “no” votes, and stated that *“consultation had clearly shown a majority against separation”.*

This emphasis on the number of votes received against the separation of the parish is also to be found in your response of 21 October 2020, in which you state **“Given the high percentage**

***of responses that did not support the proposal, the Working Group unanimously agreed that separation of the existing parish council should not take place.***

Section 96 of the guidance on CGRs states:

*“In making its recommendations, the review should consider the information it has received in the form of expressions of local opinion on the matters considered by the review, representations made by local people and other interested persons, and also use its own knowledge of the local area. It may be that much of this information can be gained through the consultation which the council will have held with local people and also the council’s wider engagement with local people on other matters. In taking this evidence into account and judging the criteria in the 2007 Act against it, a principal council may reasonably conclude that a recommendation set out in a petition should not be made. For example, a recommendation to abolish or establish a parish council, may negatively impact on community cohesion, either within the proposed parish area, or in the wider community within which it would be located, and therefore should not be made”.*

The “expressions of local opinion” received by the council are a secondary consideration which should be judged against the criteria in the 2007 Act. Whilst these opinions should be taken into account, they should not replace the use of the principle criteria in reaching a decision. In other words, the guidance makes it clear that a CGR cannot just be a vote. Where local views and opinions are sought they have to express reasons which allow them to be judged against the principle criteria. There is no basis in the law or guidance for rejecting a request in a petition simply because the majority do not want it.

The consultation questionnaire was clearly designed to elicit a “yes or no” response to the question “Do you want to separate the parish?”, with the option of including additional comments. The emphasis was on what residents wanted, rather than why they wanted it. The result of the consultation showed only that a majority of respondents were not in favour of separation.

CDC has only considered the “expressions of local opinion”. These expressions have not been judged “against the criteria in the 2007 Act”; they have not been judged against anything. Indeed, a simple “no” response does not provide any information which could be judged against the principle criteria.

Basing a decision solely upon the result of a vote ignores the principle criteria set down in law, and effectively gives the majority what they want, regardless of why they want it. It is a popularity contest, not a review of whether governance is effective and convenient, and reflects the needs and identities of a community.

In our petition we have complained that as a minority, it is not possible, nor would it be right, for us to outvote the majority and replace our needs and interests with theirs. In other words, as a minority within Adderbury parish, we will always be outvoted, and decisions which exclusively affect West Adderbury will always be made by residents of East Adderbury and Twyford.

It is perverse for CDC to base its decision on whether this is fair on the results of a process which allows the majority in East Adderbury and Twyford once again to outvote West Adderbury.

Arguably, the law requires that if the principle criteria are satisfied, and if the request in the petition would lead to more effective and convenient governance, reflecting the identities and interests of the people in the area under review, then it would need more than just a majority

against the request in order to deny it. The aim of a CGR is to improve democracy, not to satisfy people's wishes.

It is clear that section 96, which you quote, clearly does not allow the expression of opinion to be a simple vote. Indeed, the only possible example it gives which would justify rejecting the request in a petition, even though it might satisfy the principle criteria, is that of community cohesion.

We note that the Working Group report refers to a common theme amongst the "no responses", namely a wish for community cohesion and unity, particularly against the backdrop of the current Covid-19 situation (which as a hopefully transient issue surely has no relevance to a long term governance problem). In his verbal statement, Councillor Reynolds stated that a reason for not recommending the splitting of the parish was that "*Separation would not only be divisive but destroy the cohesion that one council brings*".

However, Councillors Reynolds, McHugh, Corkin and Woodcock then all went on to describe the "*toxic*" history of Adderbury, the "*current fixed and at times fairly ferocious views*", "*the worst behaviours of people*" and the comments that "*were close on being libellous*". Councillor Reynolds explicitly referred to a ten or twelve year period in which "*they had been arguing throughout*". The report itself expresses disappointment with the tone, language and content of some of the responses that had been submitted.

It is clear that the current single parish council in Adderbury is not bringing "cohesion" to the parish; quite the contrary. CDC do not appear to have taken into account the current lack of community cohesion in reaching their decision.

The government guidance on CGRs explicitly states that "*Setting up parish councils offers the opportunity to strengthen community engagement and participation and generate a positive impact on community cohesion*" and that "*It would be difficult to think of a situation in which a principal council could make a decision to create a parish and a parish council which reflects community identities and interests in the area and at the same time threatens community cohesion*". The potential positive effect on community cohesion of separating the parish does not appear to have been a factor in the CGR, despite the number of comments from respondents who suggested this could be the case:

*"Current governance is divisive and spills into community. WAPC would improve community cohesion".*

*"The failed experiment to combine the villages in the 1970s has destroyed community cohesion and caused nothing but ineffective governance. CDC has tried to resolve this issue in the past but the issues are structural problems which can only be resolved by reverting to separate parishes".*

*"We also think that giving West Adderbury and East Adderbury their own parish councils will heal the recent political divisions and bring our communities back together again".*

*"We simply ask that we can work together as a community in West Adderbury to preserve our rich cultural and historical backdrop."*

*"Having 2 PC's could improve the relationship between East and West Adderbury - current relationship is dividing the community as a whole".*

*"Reinstating West Adderbury will also put an end to the in-fighting and ultimately heal the wounds".*

*"To end the constant bickering which appears on social media".*

*“Tensions in Adderbury have become toxic and have long been affecting community life as well as individuals' lives. We have a beautiful, vibrant village and it would be very sad not to seek a constructive way through to a happier future for all. It's clear that many routes have been tried already, with no success, and therefore that continuing with the status quo, while simply pretending that deeply ingrained stresses will disappear, isn't logical. My hope is that the granting of a parish council to both West and East Adderbury will empower all parts of the community, and this will give us all a new opportunity to learn to share that power effectively, to work together and to respect each other. I believe there is far more chance of our community healing and coming together if we adopt this creative, new approach”.*

CDC are legally obliged to explain the reasons for their decision. The “reasons” provided in the report and at the council meeting are all negative “reasons” for not separating the parish. Nowhere does CDC discuss or even refer to any positive reasons for separation, or why those positive reasons are outweighed by the negatives.

Furthermore, it is a stretch to call the bald statements of opinion put forward in the report “reasons”. They offer no justification or explanation and are unsupported by evidence or argument. Having written to CDC to state that the petitioners do not understand the “reasons” provided by the Working Group, it is disappointing that your response simply refers us back to these statements. Surely, the purpose of the legal requirement to give the reasons for your decision is so that it can be understood by the petitioners.

The Working Group appears to suggest that warding of the existing parish council could somehow provide a solution to the issues raised in the petition. The guidance is clear that warding is merely an electoral arrangement to be considered after the primary criteria have been reviewed. It is not designed to replace a review of these criteria. Moreover, warding will inevitably provide West Adderbury with less representation than it has had in the past and will not solve the issue of decisions affecting West Adderbury being made by the majority in East Adderbury and Twyford. The fact that the Working Group proposes warding as any kind of solution highlights its complete misunderstanding of the concerns raised in the petition.

Along with warding, the guidance also refers to “parish meetings”. The report of the Working Group does not consider the implementation of a parish meeting and does not explain why warding is considered, but a parish meeting is not. If the Working Group believes that reinstating West Adderbury Parish Council is for some reason not viable, it is difficult to see why a parish meeting was not at least put forward for consideration in the second stage. We note that the villages of Middle Aston and Steeple Aston, which respectively have a parish meeting and a parish council, have startling similarities with West Adderbury and East Adderbury/Twyford. We can see no reason why the existing separate governance for Middle Aston and Steeple Aston should be acceptable to CDC when the separation of Adderbury parish is not.

In summary, we believe that CDC has deliberately chosen not to carry out the CGR as requested in the petition; it has ignored the specific issues it was asked to examine in the petition; it has substituted an area of review which inevitably favours the interests of Adderbury parish and the larger area of East Adderbury/Twyford at the expense of the interests of West Adderbury; it has compounded this by failing to apply the criteria set down by law and has

instead carried out a poll in which inevitably West Adderbury has yet again been disadvantaged by its minority status.

Despite the fact that the Working Group itself notes that West Adderbury has been and continues to be well-represented on APC, the Working Group mischaracterises the comments of the consultees as relating only to under-representation or misrepresentation. Instead of trying to understand this apparent paradox by using the second stage consultation to uncover the real reasons for dissatisfaction, CDC has taken a superficial view to shut down any further discussion which might lead to the separation of the parish.

**We believe that this is a deeply flawed process and ask that CDC call an immediate halt until the deficiencies in its current approach can be remedied. We would urge CDC to finally fully engage with the petitioners and to respond in detail to the points set out above as soon as possible.**