



Independent Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041

Inspectors: Caroline Mulloy BSc (Hons) DipTP MRTPI

Dr Rachael Bust BSc (Hons) MA MSc LLM PhD MIO L MCMi FGS MIEEnvSci MRTPI

Programme Officer – Mr Ian Kemp

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Policy Manager
Abbey House
Abbey Close
Abingdon
OXON
OX14 3JE

Dear [REDACTED],

Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041

1. Initial hearing sessions were held between 3 and 5 June 2025 to examine compliance with statutory procedures and legal compliance, including the Duty to Cooperate (DtC), the housing target/requirement, and the employment land requirement. We would like to thank the Councils and other participants who contributed to the discussions at the hearing sessions. We are now able to set out our conclusions on the DtC and our overall position on the examination going forward.
2. Section 33A of the Planning and Compulsory Purchase Act 2004 ('the Act') sets out a DtC in terms of the preparation of a development plan document as far as it relates to a strategic matter. The duty requires the Councils to have co-operated in maximising the effectiveness of the preparation of the Local Plan and in particular to have engaged constructively, actively and on an ongoing basis. The duty concerns the period up to the submission of the Local Plan for examination.
3. Oxford City Council (OCiC) considers that it is unable to meet all of its own housing needs. It is a neighbouring local authority and forms a part of the Oxfordshire Housing Market Area (HMA) which also includes South Oxfordshire District Council (SODC) and Vale of White Horse District Council (VoWHDC), to be referred to as 'South and Vale' from hereon in. Our letter will focus on the engagement with OCiC either bilaterally or through the Oxfordshire Planning Policy Officers Group (OPPO) or other groups in relation to the housing need/requirement and unmet housing needs.

Background

4. Historically, there has been close collaboration and joint working between the local planning authorities in Oxfordshire in relation to plan making and the approach to identifying housing needs. The authorities collaborated on the Oxfordshire Strategic

Housing Market Assessment (SHMA) published in 2014. This provided the evidence base on housing need for the respective Local Plans being prepared by each of the authorities at that time. This SHMA provided a county wide (mid-point) requirement of 5000 dwellings per annum (dpa), against which OCiC was found to have an overall unmet need of 15,000 dwellings.

5. In November 2016, a Memorandum of Co-operation (MoC) (GRO01) was signed which set out an apportionment of Oxford City's unmet housing need between the other authorities. Whilst SODC did not sign the MoC, it reflected its allowance of 4,950 homes between 2021 and 2035 in the South Oxfordshire Local Plan adopted 2020. The Vale of White Horse Local Plan Part 1 (2016) and Part 2 (2019) provided for its allowance of 2,200 homes between 2019 and 2031.
6. In November 2017, the Oxfordshire Authorities entered into the Oxfordshire Housing and Growth Deal and work progressed on a strategic plan for Oxfordshire (the Oxfordshire Plan 2050). A key element of this was the joint commissioning of the Oxfordshire Growth Need Assessment (OGNA). The Oxfordshire Plan 2050 was issued for Regulation 18 consultation in the autumn of 2021. However, work on the Oxfordshire Plan 2050 came to an end in August 2022. This was primarily due to the inability of the authorities to reach agreement on the approach to planning for future housing needs.
7. Following this, OCiC commenced work to replace the Oxford Local Plan (OLP). It commissioned a Housing and Economic Needs Assessment (HENA). This was prepared on a similar methodology to the OGNA and sought to assess housing needs on an Oxfordshire wide basis and then set out a preferred distribution of those needs between each authority. The HENA was published in February 2023. This identified a housing need figure of 1,322 dpa for Oxford City in comparison to the standard method figure of 762 dpa. Its Housing and Economic Land Availability Assessment (2023) (HELAA) identified a total housing capacity for Oxford City of 9,612 homes in the period 2020-2040, or 481 dpa, well below even the standard method figure.
8. OCiC identified in its Regulation 19 consultation that there was an unmet housing need of 16,828 homes (2020-2040), of which 14,300 homes had already been identified in currently adopted Local Plans. This resulted in a residual unmet need of 2,528 homes (126 dpa). In December 2023, OCiC wrote to each of the Oxfordshire Authorities to formally ask whether those authorities would be able to meet any of the residual unmet need. OCiC submitted its draft Oxford Local Plan 2040 (OLP) for examination on 28 March 2024.
9. Hearing sessions into the draft OLP were held in June 2024. On 11 September 2024, the Inspectors examining the plan concluded that OCiC had failed to comply with the DtC. In addition, it was concluded that the HENA's quantification of housing need was not justified, and the draft OLP was not sound in this respect.

The South Oxfordshire and Vale of White Horse Joint Local Plan

10. South and Vale began work on the Joint Local Plan (JLP) in March 2021. Regulation 18 consultation was undertaken in two stages: the Issues Consultation (May-June 2022) and the Preferred Options Consultation (January-February 2024). Regulation 19 consultation was undertaken from 1 October to 12 November 2024 prior to submission of the Joint Plan to the Secretary of State on 9 December 2024.

Strategic Matters

11. Section 33A (4)(a) of the Act defines a 'strategic matter' as *"sustainable development or use of land that has or would have a significant impact on at least two or more planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas."* Paragraph 26 of the National Planning Policy Framework (NPPF) identifies that joint working should help to determine whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
12. We acknowledge that the JLP does not generate any unmet need in itself. However, South and Vale are within the Oxfordshire Housing Market Area. Given the shared boundary with Oxford City, the overall scale and type of housing provided in the JLP could clearly have an impact on Oxford City in terms of the availability and affordability of housing, commuting patterns and the availability of a workforce to support economic growth.
13. The JLP carries forward sites to meet Oxford's existing, previously agreed unmet need from the existing adopted South Oxfordshire Local Plan and the Vale of White Horse Local Plan. Whilst specific sites are not identified in the JLP to meet the unmet need, it is likely that any such sites would be on the boundary with Oxford City in the interests of sustainability. How those sites are developed could have significant implications for Oxford City. For these reasons, we consider that how the JLP proposes to meet the previously agreed unmet need is a strategic matter which has a significant impact on at least two planning areas.
14. South and Vale disagree that there is unmet need arising from the now withdrawn draft OLP or generally beyond 2031/36. However, it had been identified as a specific issue by OCiC and confirmed by a formal request to meet the unmet need during the preparation of the JLP (LPA02.2 076). Even calculating Oxford City's unmet need based on the standard method in place at the time of the OLP examination results in a local housing need of 762 dpa compared to the potential capacity of 481 dpa identified by OCiC resulting in an unmet need of 281 dpa. Consequently, as recognised by the Inspectors in their letter of 11 September 2024 to OCiC, *"given the constrained nature of the City, there would still be a significant shortfall in capacity"*.
15. There is a history of Oxford City not being able to meet its own housing need reflecting the constraints of the city, which is encircled tightly by Green Belt and also due to a tightly drawn local authority boundary. Furthermore, there had been discussions at OPPO meetings regarding unmet need for some time. Indeed, South and Vale agree in the Oxfordshire Statement of Common Ground (DUC02) that housing need and supply is a strategically important matter which has important cross-boundary implications for local plan making. While the level of unmet need and the justification for it could be a matter for debate, there is enough here to demonstrate that this was a strategic matter on which cooperation was required.
16. In conclusion, housing need/requirement and unmet housing need are clearly a strategic matter which require cooperation.

Did the Councils engage constructively, actively and on an ongoing basis with Oxford City Council and adjoining authorities on housing need/requirement and unmet housing needs?

17. The full chronology of events is set out in a number of documents including: The DtC Statement (CSD09.1); the Councils' Response to the Initial Questions and associated appendices (LPA02; LPA02.1-LPA02.4) and LPA28. Most recently, the Statement of

Common Ground (SoCG) with OCiC (July 2025) (LPA038) sets out an agreed chronology of events between South and Vale and OCiC, although it is noted that OCiC do not agree that the events evidence active and constructive engagement on an on-going basis. These documents contain tables which reference a significant number of meetings with statutory and neighbouring authorities, and it is not attempted to repeat this here. However, the following section draws conclusions as to whether the evidence demonstrates that the engagement was constructive, active and ongoing in a manner which maximised the effectiveness of plan-making.

Early engagement (Part 1 Regulation 18 Issues Consultation) (March 2021-May/June 2022)

18. Early engagement (March 2021-May 2022) on the JLP progressed in tandem with work on the Oxfordshire Plan 2050 and OGNA. At this stage the JLP was intended to sit under the Oxfordshire Plan. South and Vale engaged with adjoining authorities through OPPO group regarding the Oxfordshire Plan as set out in LPA02 and associated appendices. Consultation on Part 1, Regulation 18 of the Issues Consultation of the JLP began on 12 May 2022. OCiC responded to this consultation and raised (amongst other things) that the ability of Oxford to meet its own housing needs within the boundary of the city is limited. South and Vale have, therefore, been aware from an early stage of plan making that OCiC may have unmet housing need.

July 2022-December 2023 (Part 1 Regulation 18 Issues Consultation up to Part 2 Regulation 18 Preferred Options Consultation)

19. Work ended on the Oxfordshire Plan 2050 on August 2022 and individual authorities subsequently took on the scope of housing needs. During this period the OLP progressed slightly ahead of the JLP.
20. South and Vale contacted other Oxfordshire Councils in December 2022 inviting them to join in a commission for the housing needs assessment. However, Oxford City and Cherwell had already commissioned their HENA at that stage. None of the other Councils joined the commission.
21. A joint meeting of OCiC and South and Vale (27 March 2023, Doc 044 of LPA02.02) discussed South and Vale's comments to Oxford City's Regulation 18 (Part 2) consultation (Nov 2022). Concerns related to the methodology of the HENA (Doc 039 of LPA02.2), exceptional circumstances and capacity in the HELAA. This meeting explored the differences between the Councils and there was a commitment to escalate the issue to senior managers. However, the evidence is not clear as to whether the issue was escalated and there appeared to be no narrowing of the issues.
22. In April 2023, South and Vale held a workshop for the emerging Joint Housing Needs Assessment to which neighbouring councils were invited. Whilst the Councils confirmed the intention to use the standard method for establishing housing need for the JLP at the workshop, it was largely focussed on specialist housing need.
23. A bilateral meeting took place between South and Vale and OCiC on 26 June 2023 (LPA02.2 050) in order to provide an update on respective local plans. At this meeting, OCiC set out the draft working assumptions of Oxford's need based on the HENA (rather than using the standard method) and capacity based on the HELAA. South and Vale sought clarification from OCiC regarding the exceptional circumstances for their intention to depart from the standard method. South and Vale also announced their intention to commission consultants to review both Oxford's HELAA and the HENA to reach their own conclusions regarding unmet need for Oxford. It was also

agreed that both sides would seek to reduce the scope of differences of opinion; however, this did not appear to happen.

24. Genuine discussions took place at OPPO meetings regarding unmet need on a number of occasions over the Summer and Autumn of 2023 (30 June 2023 [LPA 02.2 051]; 19 July 2023 [LPA 02.2 053]) including the best group to discuss the matter and early discussions surrounding an Oxfordshire Statement of Common Ground.
25. At an OPPO meeting of 5 September 2023 (LPA02.2 060), the group discussed a paper by OCiC which had been previously circulated for comment (11 August 2023) entitled 'Note on Oxford's Housing Numbers 2023' (LPA 02.2 056) which set out the draft housing numbers as they stood at that point in time. At the same meeting, a note prepared by Oxfordshire County Council (OCC) on Housing and Oxford's unmet need (LPA 02.2 060) was discussed. This assessed the potential for more housing to be accommodated on sites already allocated close to Oxford in the various Local Plans (set out in Table 2 of the note). It shows that taking account of planning permissions that some 2,846 additional dwellings could be accommodated on those sites. This could meet the additional unmet need arising from Oxford City either on the basis of the HENA or Standard Method.
26. South and Vale draw attention to this document in supporting its position that unmet need is not a strategic matter. However, the Note on Oxford's Housing Numbers 2023 showed that, on the basis of the HENA, there would be additional unmet need beyond 2031/36 which could not be accommodated within Oxford City's boundaries. Indeed, this would also be the case on the basis of the Standard Method. Consequently, and as set out above, there is unmet need beyond 2031/36 and as such this is clearly a strategic matter. In our view, there is a clear distinction between the principle of unmet need and how that unmet need would subsequently be accommodated. The OCC document (LPA 02.2 060) merely seeks to address how any unmet need would be accommodated on existing sites in neighbouring authorities. In any event, the minutes of the OPPO meeting of 6 December 2023 (LPA 02.2 071) state that it is a working document but that there are '*politics that stop it being a commonly agreed note*'. Consequently, the note has no formal status, and the work has not been taken forward any further such as in a DtC agreement. Furthermore, meaningful discussions at OPPO meetings regarding unmet housing need appeared to stop at this point as the Councils progressed their respective plans.
27. OCiC went out to consultation on their regulation 19 pre-submission Plan on 10 November 2023. OCiC subsequently wrote to South and Vale on 2 December 2023 indicating an unmet need of 2,528 dwellings (2020-2040) and requesting assistance to meet that need (LPA02.2 075). South and Vale submitted their regulation 19 representations on the OLP (LPA02.4 Doc C) (21 December 2023) including critiques of HENA and HELAA provided by their consultants. A bilateral meeting of South and Vale and OCiC took place 19 December 2023 (LPA02.2 074) where South and Vale's concerns regarding the HENA and HELAA work were discussed. South and Vale queried whether a technical response from the consultants to South and Vale's concerns was pending. However, OCiC stated that this would be a matter for the examination to consider. Whilst there was a discussion surrounding the issues at the meeting, there was no progress in resolving the issues and there seemed to be an acceptance that the matter would be played out through the examination process.

January 2024 – 9 December 2024 (Regulation 18, Part 2 -Preferred Options to submission of JLP)

28. South and Vale replied to OCiC's request for assistance to meet unmet need on 19 January 2024 (LPA02.4 Doc E). In this letter South and Vale respond by referring to the long-standing concerns regarding the housing need and capacity evidence. They then go on to say *"considering this context and a lack of progress in resolving these matters, neither SODC nor VoWH DC can currently agree to meet any unmet housing need that exists for the period after 2036 i.e. new unmet housing need that has not previously been accommodated, as we are not persuaded by your evidence (given its deficiencies).*
- We would ask you to reflect carefully on your current intentions to submit your Regulation 19 Local Plan, as presently formulated, for independent examination and would ask instead, you engage with us on a more appropriate and productive way forward. However, we will in any event engage with you regarding any content that may be more appropriate for a Statement of Common Ground".*
29. South and Vale's response shows the extent of disagreement regarding the evidence base for housing. Whilst the Council invited OCiC to engage on the issue, this did not appear to happen as both the OLP and JLP progressed at pace. Notably, the letter did not demonstrate that the Councils had explored whether the unmet need could be delivered in the JLP areas.
30. South and Vale published the Preferred Options version of the JLP for Regulation 18 consultation on 10 January 2024 (LPA02.2 077) whilst OCiC submitted its draft OLP for examination on 28 March 2024.
31. From 11-13 June 2024 the examination hearing sessions of the OLP took place at which South and Vale made representations. The Inspectors wrote to OCiC, 11 September 2024 (LNP05) advising them that they had failed the DtC; that the housing evidence supporting the Plan was not robust; and, that there were no exceptional circumstances to justify a departure from the standard method. There was a subsequent exchange of letters (LPA27); however, this did not change the outcome of the examination, and the Plan was subsequently withdrawn on 27 January 2025.
32. Meanwhile, South and Vale published their Regulation 19 pre-submission JLP on 1 October 2024 (LPA02.2 106). This occurred 4 days after OCiC published the Inspectors' letter (27 September 2024) leaving limited time to discuss the implications of the Inspectors' letter for potential unmet need and the JLP. OCiC submitted their response to the JLP Reg 19 consultation (response 68988680).
33. It is clear that direct communication between South and Vale and OCiC during this time in 2024 was limited to responding to formal consultations on the local plans with each effectively maintaining its respective positions. Furthermore, the OPPO meetings between January 2024 through to November 2024 appear to be largely updates in terms of progress on respective plans with no further substantial discussions in relation to unmet housing needs (LPA02.2: 076; 079; 082; 087; 090; 095; 097; 100; 102; 108;115). Indeed, the Councils' response (LPA02) to our Inspectors' Matters, Issues and Questions (ID02) at Q2.6.6 states *"During this time, we awaited the outcome of the Oxford Local Plan Examination, which we put significant effort and resource towards engaging with between February and June 2024".* Consequently, there is a significant gap in meaningful engagement between January 2024 and 28 November 2024 outside of the formal examination process.
34. Correspondence between South and Vale and OCiC (26/11/24 [App 2 CSD09.1]; 02/12/24 [App2 CSD09.1]; 05/12/24 [LPA02.2 127]) sought to address South and

Vale's queries regarding next steps for the OLP. However, OCiC was not in a position to clarify at that time.

35. A bilateral meeting of South and Vale and OCiC took place 28 November 2024 to discuss OCiC's Regulation 19 representations (LPA02.2 119). It was intended that the meeting help to inform a bilateral SoCG. In terms of housing, the meeting discussed the way in which existing unmet need is met; the standard housing method and alternative methods; and the delivery of housing supply. There was no discussion on potential unmet need beyond 2031/2036. Furthermore, there appeared to be no resolution to any of the housing matters discussed. This reflected the timing of the meeting, a week before submission of the JLP and it was, therefore, highly unlikely that there would be a change of position on behalf of South and Vale.
36. During 2024 progress on an Oxfordshire SoCG (DUC02) involving Cherwell District Council, OCiC, South Oxfordshire District Council and West Oxfordshire District Council continued in OPPO meetings.
37. With regards to how the JLP accommodates the previously agreed unmet need and in terms of any unmet need beyond 2031/36 the SoCG simply repeats South and Vale and OCiC stated positions as matters which are not agreed. It also confirms OCiC's view that South and Vale have not met the DtC. It takes the respective Councils positions no further.
38. A bilateral SoCG between South and Vale and OCiC was not forthcoming before the JLP hearing sessions. At our request the Councils sought to provide a SoCG following the examination hearing sessions. We were advised initially that it was not possible to reach agreement. However, a SoCG was eventually submitted on 11 July 2025. Whilst useful for setting out an agreed chronology of events, it cannot be taken into account as an act of cooperation in our assessment for the DtC as it is post-submission. Furthermore, in addition to setting out an agreed chronology of events, it merely sets out legal principles in terms of what is required under the DtC, the interpretation of case law in relation to the DtC and what constitutes a 'strategic matter'. It does not address either previously agreed unmet housing need nor any additional unmet housing need post 2031/2036 or move the issues any further forward.

Conclusions on engagement in relation to housing and unmet needs.

39. It is clear that there is fundamental disagreement between South and Vale and OCiC on the matter of how the previously agreed unmet need is addressed in the JLP and on any potential additional unmet need beyond 2031/2036. However, the DtC requires that cooperation remains active and on-going even where discussions have failed to reach agreement. Early disagreement does not negate the need to continue engaging under the DtC.
40. The overall structures for engagement evolved following the abandonment of the Oxfordshire Plan 2050 (as set out in the diagram following IQ10.7 of the Councils' response [LPA02] to our initial questions [ID01]) should have provided an appropriate mechanism by which to engage on cross-boundary strategic issues. There is some evidence of success in terms of joint working through OPPO including progressing a joint county-wide Gypsy and Traveller Accommodation Assessment. However, they have not been effective regarding the issue of unmet housing need. The minutes of the OPPO meeting on 19 July 2023 (LPA02.2 [053]) indicate that the OPPO would be the key group for detailed discussions for housing matters with issues escalated to more senior levels within each organisation as and when necessary, reflecting that OPPO is not a decision making group. However, the evidence submitted

demonstrates that many of the OPPO meetings appear to just be updates and where unmet need has been discussed the issues have not progressed any further.

41. The Planning Practice Guidance (PPG) is clear that “comprehensive” and “robust” evidence will need to be submitted to evidence attempts made to co-operate and that this evidence will need to be thoroughly tested at an Examination. The tables set out in Section 3 of the DtC Statement (CSD09.1) and in the Councils’ response to the Initial Questions and associated appendices (LPA02; LPA02.1-LPA02.4) and LPA28 offer structured tabular summaries of engagement covering dates, participants, meeting records, outcomes, areas of disagreement, and stated influence on the JLP. However, much of the engagement appears reactive and procedural, rather than proactive and solution or outcome focused. The tables show a pattern of passive engagement with little to no substantive attempt to resolve strategic cross-boundary issues in respect of Oxford’s housing needs. Consequently, the submissions and supporting appendices fail to demonstrate that the DtC has been met.
42. Throughout the process, South and Vale have had a reluctance to accept that there could be any unmet need for Oxford City beyond 2031/36. Given the historical constraints of Oxford City, together with the calculation of the Standard Method for Oxford City, it should have been obvious that there was a reasonable prospect of unmet need in this period. Even if South and Vale disagree with OCiC this does not absolve them from the responsibility to engage.
43. Engagement has focused heavily on objecting to the HENA and OLP, without offering alternative proposals or seeking compromise. Consequently, they have failed to engage with OCiC in a meaningful way; preferring instead to await the outcome of the OLP examination. This is reflected in the significant gap in meaningful discussions between January and November 2024.
44. Whilst South and Vale have put significant resources into contesting the HENA and the OLP through the formal process, this does not constitute constructive, active and on-going engagement. That requires constructive discussion seeking to establish common ground. There is no evidence of active and constructive discussion of this nature. Furthermore, there is no evidence that any discussions have led to positive outcomes, or indeed any outcomes at all. On the key strategic matter of housing need the record reveals a persistent failure to progress beyond a statement of difference. The significant gulf between South and Vale and OCiC remains, and the situation has not moved forward in any way during the JLP process.
45. The JLP simply rolls forward the previous commitments made under the MoC, as set out in the existing plans for SODC and VoWHDC. However, these were based on an out-of-date assessment of housing need originally set out under the SHMA (2014). In any event, these existing commitments only cover unmet need in the period up to 2031 in VoWH and up to 2036 in SODC.
46. Paragraph 11 of the PPG makes clear that part of the key evidence to support compliance with the DtC will be a SoCG between neighbouring authorities. Paragraph 20 states that this should be available by the time that the plan is submitted for examination. Paragraph 11 of the PPG expects SoCG to include agreement on the *“distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area”*.
47. The PPG also states that SoCG should set out:
 - a) the capacity within the strategic policy making authority area(s) covered by the statement to meet their own identified needs;

b) the extent of any unmet need within the strategic policy-making authority area(s); and

c) agreements (or disagreements) between strategic policy-making authorities about the extent to which these unmet needs are capable of being redistributed within the wider area covered by the statement”.

48. The Oxfordshire SoCG (DUC02) does not address the above matters. Neither does the post-submission bilateral SoCG between South and Vale and OCiC. It merely sets out a chronology of events and legal opinions on what the DtC involves and what constitutes a strategic matter. This is a clear indicator of what we see as the fundamental breakdown of cooperation between South and Vale and OCiC and their willingness to engage as required by the DtC.
49. Whilst it is acknowledged that there is uncertainty around the precise level of unmet housing need in Oxford it is nevertheless incumbent on the Councils to maximise the effectiveness of plan making in order to meet with the requirements of the DtC. An active process of ongoing and constructive engagement might or might not have led to a more positive outcome. However, what is certain is that, if parties choose not to engage with each other, there will be little prospect of difficult but important cross boundary issues being resolved.
50. In summary, potential unmet housing need for Oxford City beyond 2031/36 and how the JLP accommodates previously agreed unmet need are strategic matters and, therefore, fall under the DtC. Consequently, the Councils should have engaged constructively, actively and on an on-going basis on the issues. Whilst there were some early attempts at engagement, for the period between January 2024 and November 2024 meaningful engagement on this issue did not occur outside of the formal examination process. Consequently, the DtC in Section 33A of the 2004 Act has not been met. This cannot be remedied during the examination of the plan.
51. In the light of the failure to adequately discharge the DtC, there are two options open to South and Vale, either to withdraw the JLP from the examination or to ask that we write a report setting out our conclusions. The latter option would incur further expense, and the contents of our report would likely be very similar to this letter.
52. We are aware that South and Vale will be very disappointed with our findings. We have not come to this conclusion lightly, and we appreciate the amount of work that has been undertaken to get the JLP to the current stage. We await to hear from you as to whether you propose to withdraw the JLP from examination. It would be helpful if the Councils could indicate when they anticipate being able to provide a response to this letter. In the meantime, we would be grateful for this letter to be posted on the examination webpage. However, we are not inviting, nor envisaging accepting, any comments from other parties.

Yours sincerely,

Caroline Mulloy and Rachael Bust

Inspectors