

Councils' Response to Key Issues

Joint Local Plan



Contents Page

Introduction	3
Key Issues.....	4
Chapter 1: Introduction	4
Chapter 2: About the Districts	5
Chapter 3: Vision and objectives	7
Chapter 4: Climate change and improving environmental quality	9
Chapter 5: Spatial strategy and settlements	25
Chapter 6: Housing.....	35
Chapter 7: Jobs and tourism.....	54
Chapter 8: Site allocations and Garden Villages.....	65
Chapter 9: Town centres and retail	112
Chapter 10: Well-designed places for our communities.....	114
Chapter 11: Healthy places.....	119
Chapter 12: Nature recovery, heritage and landscape.....	127
Chapter 13: Infrastructure, transport, connectivity and communications	142
Chapter 14: Monitoring and review	149
Chapter 15: Local plan explainer	149
Joint Local Plan Appendices	150
Policies Map	152
Key issues raised on other core submission documents	153
Key issues on processes relating to the Joint Local Plan	158

Introduction

This document sets out South Oxfordshire and Vale of White Horse District Councils' response to the key issues raised during the Regulation 19 Pre-submission Publication Period for the Joint Local Plan (JLP), which ran for six weeks from 1 October until 12 November 2024.

Following the conclusion of the Publication Period, we read each response received and analysed the contents to identify the issues raised:

- We identified **thirteen main issues** which cut across the whole of the Joint Local Plan, which we reported on in Section 4 of the Regulation 22 Consultation Statement ([examination library reference CSD10](#)). The Regulation 22 Consultation Statement and its appendices were submitted to the Secretary of State in December 2024. Our responses to the **main issues** can be read in the separate 'Councils' Response to the Main Issues' document ([examination library reference LPA11](#)).
- We also identified **key issues** raised per chapter, policy and topic relating to the Joint Local Plan, which we reported on in Appendix H to the Regulation 22 Consultation Statement ([examination library reference CSD10.1](#)). We are now providing responses to each of the **key issues** in this document as part of the examination of the Joint Local Plan.

Key Issues

We identified the following **key issues** raised through representations to the Pre-submission Publication Period, which we reported in Appendix H to our Regulation 22 Consultation Statement. We have reproduced the key issues below, alongside our response to each issue.

Chapter 1: Introduction

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 1</p>	<ol style="list-style-type: none"> 1. Concern raised by respondents regarding the accelerated JLP timetable, noting that it was ambitious and questioning whether it allowed for sufficient engagement and review. 2. Concerns raised regarding the plan period, noting that: <ol style="list-style-type: none"> a. it is not consistent with national policy to start the plan period in 2020 and should instead start it in 2024. b. it is not justified and should be extended to 2042 or 2043 due to account for delays in plan-making process. 	<ol style="list-style-type: none"> 1. In respect of the accelerated timetable for submission, this was achieved. The period for representations to be made and the processing of them was in line with the Regulations. For more information, please see our response to Main Issue 2 (examination library reference LPA11). 2. The JLP plan period of 2021 – 2041 is appropriate, because: <ol style="list-style-type: none"> a. 2021 was the year we started preparing the plan. The start date for a plan is not stipulated in national policy, which states that plans should look ahead over a minimum 15 year period from adoption. b. We consider the plan has been submitted for Examination with sufficient time to allow for the plan to look ahead over a minimum 15 year period from adoption. For more information, please see the response to Main Issue 2 (examination library reference LPA11). <p>We responded to this issue in our written statement (examination library reference WS1/1) to the Inspectors' Matter 1 Issues and Questions. Following the stage 1 hearing sessions we submitted a document detailing the housing and employment requirements and supply calculations for alternative plan periods at the request of the Inspectors (examination library reference LPA32).</p>

	3. Concern raised regarding alignment with new National Planning Policy Framework (NPPF).	3. National policy changed after the submission of the JLP, so the plan is being examined under transitional arrangements and the relevant NPPF is the December 2023 version. For more information, please see the response to Main Issue 13 (examination library reference LPA11).
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Chapter 2: About the Districts

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 2	<p>1. Some respondents questioned whether the plan is in accordance with NPPF (2023) paragraph 16(c) regarding meaningful engagement, citing:</p> <ol style="list-style-type: none"> a. the priority issues remaining the same from the issues consultation. b. the response rate to the consultations being low. c. [Being The]* critical of the positive frame of the consultation statement. <p><i>*Correction to the Reg 22 consultation statement</i></p>	<p>1. (a-c) We are satisfied that the Joint Local Plan 2041 has been prepared and submitted in compliance with the Joint Statement of Community Involvement (SCI) (examination library reference OCD02) and that we have been able to undertake meaningful engagement throughout the plan making process. We have prepared a series of consultation statements and reports which evidence the various publicity methods used to support the preparation of the plan. These are:</p> <ul style="list-style-type: none"> • Issues Consultation Results (examination library reference LPP14) • Preferred Options Consultation Statement – Updated Version (examination library reference LPP07.2) • Preferred Options Consultation Statement Appendices (examination library reference LPP07.1) • Regulation 22 Consultation Statement and Appendices A-G (examination library reference CSD10) • Regulation 22 Consultation Statement – Appendix H (examination library reference CSD10.1) <p>The Issues Consultation Results and Preferred Options Consultation Statement outline how main issues raised through the Regulation 18 consultation stages were taken into account.</p>

We set out to be innovative, inclusive and pro-active in how we approached engaging with the public and stakeholders, including, but not limited to:

- Using the digital platform Storymaps to host interactive online platforms for our Issues and Preferred Options Consultations. This allowed people to browse through the different themes or chapters of the Joint Local Plan to discover our proposals. We also produced PDF and print versions for those who prefer more traditional formats.
- Creating a 'Joint Local Plan in a Nutshell' document for the Preferred Options Consultation, as a shorter survey to showcase the highlights and headlines of the emerging plan. We used active language and plain English, with infographics, images, videos and embedded questions.
- Hosting a series of drop in sessions in a range of venues and times, including popular café bars.

Our consultation work on the Joint Local Plan was nominated for three national awards:

- Issues Consultation - Local Government Chronical Awards 2023, digital impact category – National finalists
- Issues Consultation - Planning Resource Awards 2024, stakeholder engagement category – National Finalists and awarded Highly Commended
- Preferred Options Consultation - The RTPi Awards for Planning Excellence 2024, digital planning category – National finalists

Chapter 3: Vision and objectives

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 3</p>	<ol style="list-style-type: none"> <li data-bbox="338 296 994 480">1. Some respondents did not consider the vision and objectives to be positively prepared or justified due to a range of reasons and proposed a variety of amendments to make them sound. <li data-bbox="338 1002 994 1145">2. The vision and objectives should more explicitly reference the need to facilitate the delivery of housing (including housing need & tackling affordable housing). 	<ol style="list-style-type: none"> <li data-bbox="1016 296 2125 959">1. Our local plan vision and objectives follow the advice in the paragraphs 15-16 of the NPPF in providing a positive vision for the future of the area as well as a framework for meeting development needs and addressing economic, social and environmental priorities. Our JLP vision is rooted in the local needs and priorities of our area and has been developed through early engagement with our elected members and shaped through the plan's consultation stages. We consider the plan's vision for the future is one in which planning issues are being positively and appropriately balanced. The elements are in no particular order and cover all the matters listed in the NPPG (Paragraph: 001 Reference ID: 61-001-20190315) 'set out a vision and framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places'. We do not consider that adding more detail into the vision or objectives, or changing their emphasis, is necessary for understanding the plan or for its soundness. <li data-bbox="1016 1002 2125 1294">2. The need for the delivery of housing is already covered in the vision at section 3.3 ('a place where people can thrive. Where people have housing choices they can afford'). It is also there as a priority for the plan at Objective 8 ('Plan for enough new homes to meet our needs, including significant numbers of homes that are genuinely affordable to rent or buy, and different kinds of homes to meet the needs of our communities, including older people, those with care needs and younger people getting their first home').

	<p>3. Some respondents questioned the brownfield first objective, as they considered the availability of brownfield sites across the district to be limited, and therefore it may not be deliverable action. They considered some greenfield sites will be required.</p> <p>4. Some respondents considered the vision to be too generic and/or vague.</p> <p>5. Inconsistency was noted between the objectives to urgently address climate change and safeguarding land for road schemes / provision of new homes.</p>	<p>3. National policy tells us to prioritise brownfield land (see NPPF (2023) paragraphs 123, 124c and footnote 27). Brownfield site availability will be limited, but the JLP does not rely on brownfield sites alone. There are a large number of greenfield sites allocated too, but when selecting new sites to come forward, we focussed on well-located brownfield sites within our settlements, and we consider this to be in line with national policy.</p> <p>4. The vision is designed to be concise, accessible and over-arching. Detail comes in later policies and chapters, so we do not think that the vision needs changing to make it more specific.</p> <p>5. Planning is a balance, not every element of a plan will achieve every objective, but we have sought to set a framework in the JLP for development to take place in the best way possible for the climate (for example through our policies on net zero carbon, renewables, transport and through our spatial strategy). The Sustainability Appraisal report (SA) (examination library reference CSD03) helps show in an accessible and transparent way how we have considered climate (among other objectives) in testing options and formulating our JLP policies. Table 4.2 in the SA is a matrix showing the compatibility of the local plan objectives against the SA objectives. Paragraph 4.2.1 of the SA confirms that some potential for conflict exists between plan objectives which drive towards housing and economic development and SA objectives which provide for environmental protection, but explains that these largely depend on how the objective would be implemented.</p>
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Chapter 4: Climate change and improving environmental quality

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 4</p>	<ol style="list-style-type: none"> 1. Concern was raised with solar development being permitted in the Green Belt. 2. Respondents felt policies in chapter should: <ol style="list-style-type: none"> a. be more flexible to ensure no viability or delivery impacts. 	<ol style="list-style-type: none"> 1. Please see our response under Policy CE5 (Renewable energy) later in this table, which covers planning applications for renewables and local carbon energy generation in the Green Belt, including solar farms. 2. The Joint Local Plan Viability Report and Appendices (examination library reference ITV04 and examination library reference ITV04.1) tested the impacts of all relevant Joint Local Plan policies on the financial viability of strategic sites and a wide range of different development typologies across the districts. They show that the policies as submitted are viable to implement in the districts. <ol style="list-style-type: none"> a. Regarding delivery impacts related to Policy CE2 (Net Zero Carbon buildings), the appendix of our Net Zero Carbon Study addendum (examination library reference CEQ14.5) explains that in areas that have successfully adopted ambitious energy standards in their local plans (using alternative energy-based metrics and calculation methods), monitoring has shown that so far that there has been no drop-off in planning application numbers and thus no indication that these requirements are impeding housing supply. <p>We have also taken a stepped approach to our embodied carbon standards in Policy CE3 (Embodied carbon) to address the industry's readiness to achieve these standards, requiring a higher standard for non-residential buildings and flats from the year 2030. This higher standard is expected to be achievable by 2030, when specialist construction materials and techniques required to meet this standard are expected to have become cheaper and more commonplace.</p> <p>We do not consider any other policies within this chapter will cause</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. not go beyond Building Regulations.</p> <p>3. Some respondents felt the chapter lacks reference to the impact of transport on climate change and doesn't support the Joint Local Plan objective 2 on reducing car trips.</p>	<p>delivery impacts, as the requirements set out within the policies can currently be met by the development industry.</p> <p>b. Regarding policies within this chapter that go beyond building regulations, notably Policy CE1 (Sustainable design and construction), Policy CE2 (Net zero carbon buildings) and Policy CE7 (Water efficiency), we have set out our justification for these policies in our answer to the Inspectors' Initial Questions (examination library reference LPA02, pages 89-93, paragraphs IQ66.1-IQ66.16). We have also addressed this issue individually under the relevant key issue policy sections for Policies CE1, CE2, and CE7 later on in this table.</p> <p>3. Our approach to tackling climate change is not only found in Chapter 4, it is a golden thread throughout the plan. We recognise the significance of transport impacts on climate change. How the plan addresses this issue and supports objective 2 is found in various plan chapters. Notably, Chapter 13 (the chapter which includes the transport related policies) starts by explaining 'A key focus in this plan is a new approach to transport... This approach will require new developments to focus on delivering sustainable transport and accessibility, which helps to align with our aim to provide a genuine choice whilst encouraging sustainable and active travel options in accordance with our ambitions for climate change and healthy places' (paragraph 13.3, page 352). Our spatial strategy also contributes towards the delivery of a net zero transport system, and supports the approach taken in the Oxfordshire Local Transport and Connectivity Plan (examination library reference LNP10) by promoting development where there are the best chances of reducing the need to travel by private car.</p>

Policy	Key issues raised	Councils' response to key issues raised
<p>Policy CE1: Sustainable design and construction</p>	<p>1. Respondents raised concerns that the policy exceeds national requirements, particularly Part 2(c) which sets higher requirements for overheating assessments than Building Regulations.</p>	<p>1. Part 2 c) of this policy requires all new housing developments and non-domestic buildings to submit an overheating assessment. For all new housing development, a CIBSE TM59 assessment must be completed, and for all new non-domestic buildings a CIBSE TM52 assessment must be completed. For context, Part O of building regulations only mandates an overheating analysis for new homes, with CIBSE TM59 being one way to demonstrate compliance with Part O. However, it is not required in all cases—only when the developer chooses to use the dynamic method. The more commonly used simplified method does not require a CIBSE TM59 assessment. Part O also does not require an overheating assessment for non-domestic buildings. Policy CE1 therefore goes beyond building regulations by mandating overheating assessments in all cases, ensuring a consistent, robust approach to identifying and mitigating overheating risks in new buildings.</p> <p>We consider these overheating assessments essential for two reasons. Firstly, due to the significant and increasing risk heatwaves pose to the districts. Secondly, as buildings become more energy efficient and thermally insulated, overheating risk increases. Integrating overheating assessment requirements into Policy CE1 alongside Policy CE2 – Net Zero Carbon Buildings ensures a comprehensive approach that addresses both mitigation and adaption. For these reasons, we consider this policy approach justified.</p> <p>We also refer you to our answer to the Inspectors' Initial Questions (examination library reference LPA02, pages 89-90, paragraphs IQ66.1-IQ66.6) where this key issue has been addressed in more detail.</p> <p>There are no other requirements in Policy CE1 that exceed national requirements.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents were concerned that the requirements of the policy will make development too costly and unviable.</p>	<p>2. We have demonstrated through the whole plan viability report (examination library reference ITV04 and examination library reference ITV04.1), that the requirements set out in Policy CE1 are viable. On page 21 of the viability report, it explains that 'Whilst this policy will have an impact on the costs of development, many of these requirements broadly relate to meeting government standards. It is therefore anticipated that most costs will therefore be no higher than standard development costs'. Additionally, the Net Zero Carbon Study Tasks 1 and 2 Scoping Report (examination library reference CEQ14), sets out on page 87 under the subheading 'Feasibility and Costs Overview' that there are 'no feasibility or cost implications' associated with the requirements set out in the policy. The cost that was most highlighted by respondents as potentially making this policy unviable was the cost of a CIBSE overheating assessment, as required by Part 2 c) of the policy. CIBSE overheating assessments are endorsed in national standards, as included in Part O, and we understand that their cost is marginal for applicants.</p> <p>Overall, we do not expect any policy requirements within Policy CE1 to be too costly or unviable.</p>
<p>Policy CE2: Net zero carbon buildings</p>	<p>1. Respondents raised concerns that the policy exceeds national requirements, particularly citing the December 2023 Written Ministerial Statement.</p>	<p>1. Please see our response under Main Issue 7 – Net Zero Carbon Buildings, which covers our position on the December 2023 Written Ministerial Statement and Policy CE2 exceeding national requirements.</p> <p>Our response sets out our answer to the Inspectors' Initial Questions (examination library reference LPA02) pages 90-92, paragraphs IQ66.7-IQ66.14. where we addressed the justification for a departure from the December 2023 Written Ministerial Statement, as well as Policy CE2's impact on viability and delivery.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents queried the strength of the evidence setting out the justification for departing from the Written Ministerial Statement.</p> <p>3. Respondents raised concerns that the policy will hinder the delivery of development, citing:</p> <ul style="list-style-type: none"> a. the requirements will make development unviable. b. the skills and existing supply chain are not equipped. 	<p>2. We have comprehensively justified our policy approach through robust evidence set out in our addendum to the Net Zero Carbon Study (examination library reference CEQ14.5), and we consider this approach to be sound.</p> <p>3. (a-b) In response to the concerns raised that Policy CE2 would hinder development or make it unviable, we refer to the point made earlier in this table when responding to key issue 2a for Chapter 4. Here we explained that local plans in Cornwall, Bath & North East Somerset, and Central Lincolnshire have successfully adopted ambitious energy standards using alternative energy-based metrics and calculation methods, and so far there has been no drop-off in application numbers and no indication that these policies are impeding housing supply/delivery.</p> <p>The policy targets within Policy CE2 have been rigorously costed by the Net Zero Carbon Study costs report (examination library reference CEQ14.2) and determined to be viable in the districts' Viability Report (examination library reference ITV04). We set out in more detail our evidence demonstrating that Policy CE2 will not adversely impact the viability of schemes in our answer to the Inspectors' Initial Questions (examination library reference LPA02) pages 94-95, paragraphs IQ67.4-IQ67.6.</p> <p>Regarding the existing skills and supply chains being equipped to deliver policy requirements, our Net Zero Carbon Study has addressed this on pages 82 and 86 of the Task 1 & 2 scoping report (examination library reference CEQ14), under the heading 'Industry Capability'. It sets out that the development industry should be well prepared to deliver on the policy requirements, and whilst we recognise that they will require additional levels of skill to be applied through the design and construction phases,</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>4. Some respondents raised concerns that the policy covers unregulated energy, as well as regulated energy.</p> <p>5. Oxford City Council raised that there was inconsistency in the approach to energy offsetting in 6(a) of the policy, where it requires two opposing offsetting requirements which should be corrected to one singular approach (notably energy offsetting rather than carbon offsetting).</p>	<p>they importantly do not introduce any new skills not currently known and utilised by developers.</p> <p>4. Yes, the policy's EUI target includes all energy used by a building, importantly accounting for unregulated energy as well as regulated energy. We consider it necessary for the policy to address unregulated energy as it can equate to up to 50% of the total operational energy use of a building. If the policy did not address unregulated energy, this would leave a significant proportion of carbon emissions unaddressed. We accept that there may be some circumstances where the inherent use of a non-residential building means they produce very high unregulated energy loads resulting in the specified EUI limits set out in part 3 (v) of the policy being unattainable. Therefore, the policy does provide flexibility in these cases. Where the councils agree the high unregulated energy loads are justified, Policy CE2 allows for an alternative limit on regulated energy use of 30 kWh/m²/year, with unregulated loads justified in an energy statement demonstrating they are as efficient as is reasonable for the use.</p> <p>5. We agree that there is an inconsistency in the approach to energy offsetting in 6(a) of the policy. Therefore, we have proposed a modification to correct this which has been included in the schedule of proposed modifications for submission (modification number MM02, examination library reference CSD01.1).</p>
Policy CE3: Reducing embodied carbon	<p>1. Respondents raised concerns that the policy requirements will make development unviable, particularly the embodied carbon targets.</p>	<p>1. The policy requirements set out within Policy CE3 have been rigorously costed by the Net Zero Carbon Study Costs Analysis (examination library reference CEQ14.2) and demonstrated to be viable in the districts' Viability Report produced by viability consultants Aspinall Verdi (examination library reference ITV04). Page 3 of the Costs Analysis confirms that a</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Respondents raised concerns that the policy exceeds national requirements, particularly the December 2023 Written Ministerial Statement and the Planning & Energy Act 2008.</p> <p>3. Some respondents suggested the policy could hinder the delivery of brownfield development.</p>	<p>representative selection of domestic and non-domestic archetypes was used to assess cost implications for different development types. The Cost Analysis can be read in conjunction with the Viability Report, page 22.</p> <p>The Viability Report demonstrates that the requirements of the Joint Local Plan policies as a whole, including the Policy CE3, do not adversely impact the viability of schemes.</p> <p>2. There are currently no national requirements on embodied carbon, either in the December 2023 Written Ministerial Statement, in Building Regulations, or legislation. Therefore, there is no national standard against which consistency can be judged. As a result of this, we do not believe that justification is needed for policies going beyond existing requirements in this area.</p> <p>3. We do not consider the policy will hinder the delivery of brownfield development. As set out in the supporting text of Policy CE3 (paragraph 4.28 on page 44), the policy requires applicants to adopt a range of circular economy principles to help minimise waste, increase the recycling and reuse of materials, and conserve resources within the districts, including retaining and re-using buildings where possible. These requirements are consistent with the NPPF paragraph 157, where it states that 'The planning system...should help to:...encourage the reuse of existing resources, including the conversion of existing buildings', and are therefore practices the development industry should already be utilising or should be encouraged to adopt. As a result, we consider our policy approach justified.</p>
Policy CE4: Sustainable retrofitting	1. Some respondents expressed concerns about the application of the policy to large or complex sites with numerous old and	1. Part 4 of Policy CE4 requires applicants for major development sites to demonstrate through a pre-redevelopment audit that 'opportunities for the retention and retrofitting of existing buildings, structures, and materials

Policy	Key issues raised	Councils' response to key issues raised
	<p>inefficient buildings, particularly citing the cost of undertaking pre-development audits.</p>	<p>within the site have been identified and, where feasible and viable, included within the scheme'. We consider this policy approach to be justified as it includes sufficient flexibility by only requiring the inclusion of existing buildings, structures and materials within the site where 'feasible and viable'. Additionally, the Joint Local Plan Viability Report (examination library references ITV04 and ITV04.1) assessed Policy CE4's effect on viability and concluded that 'there is no direct impact on new-build development'. The requirement only applies to major developments, and therefore we do not expect this to impact the viability of developments within the districts. Indeed, we expect that advice on retrofitting and re-using materials on site could save a developer significant waste removal costs, more than offsetting the costs of undertaking an audit report.</p>
<p>Policy CE5: Renewable energy</p>	<p>1. Respondents raised concerns that the policy conflicts with national requirements, particularly para 160a and 163b, suggesting it should be more positively worded to support renewable energy schemes.</p>	<p>1. Policy CE5 is positively worded, as it encourages proposals for renewable energy schemes and community-led initiatives, and sets criteria detailing where these schemes and associated infrastructure will be supported. Importantly, it also recognises that whilst renewable energy generation plays a vital role in meeting our net zero targets, the location of these schemes must be suitable to avoid adverse impacts on the surrounding environment. This approach is consistent with NPPF paragraph 160a which asks that local plans provide a positive strategy for renewables while ensuring that adverse impacts are appropriately addressed.</p> <p>NPPF paragraph 160b suggests that authorities should consider identifying suitable areas for renewables. The Joint Local Plan does this for the first time in our districts. As part of our Net Zero Carbon Study, we commissioned a renewable energy spatial assessment (examination library reference CEQ14.4), which was also informed by a separate renewables landscape sensitivity assessment (examination library reference NHL05). This assessment identified potentially suitable broad locations for renewable energy schemes in the districts including ground</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents raised concerns about the impact of renewable energy schemes in the Green Belt.</p>	<p>mounted solar PV, onshore wind and battery energy storage systems (BESS), and these broad locations are shown spatially on our Policies Map (examination library reference CSD02). Policy CE5 supports applications for these schemes within broad areas identified as potentially suitable on the Policies Map, helping to secure their development in line with national policy.</p> <p>The NPPF paragraph 163b is about the decision-making stage rather than plan-making, so is less relevant for the JLP, but nevertheless the JLP and its evidence base provides what will be needed for assessing applications at that development management stage. Paragraph 163b states that 'once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas'. Policy CE5 is flexible and recognises that applications may be submitted outside of the suitable broad locations. This is recognised in our policy's supporting text paragraph 4.38, which states that 'Applications for schemes outside of broad areas identified as potentially suitable on the Policies Map will only be permitted in exceptional circumstances where a detailed assessment into site-specific conditions has demonstrated that the development would be suitable in that location, to the satisfaction of the councils'. This approach is consistent with NPPF paragraph 163b.</p> <p>2. National policy in the NPPF does not rule out renewable energy projects like solar farms in the Green Belt, rather it sets out that inappropriate development would be required to demonstrate very special circumstances if projects are to proceed, and that such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. There is no need for the local plan to repeat this national policy, and Policy CE5 at part</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>3 states that:</p> <p>'Planning applications for renewable and low carbon energy generation and their associated energy storage and distribution infrastructure will be supported, provided that they do not cause significant adverse impacts that cannot be mitigated and are reversible at the end of the life of the renewable energy installation, including cumulative and cross boundary impacts on:...f) the openness of the Green Belt;'</p> <p>Therefore, the inclusion of part 3 f) within Policy CE5 will help to ensure that no potential significant adverse impacts on the openness of the Green Belt arise as a result of renewable energy schemes.</p>
<p>Policy CE6: Flood risk</p>	<ol style="list-style-type: none"> 1. The Environment Agency suggested the policy approach to development on brownfield land in Flood Zone 3b is unclear and potentially conflicts with NPPF (2023) para 165. 2. Some respondents raised concerns that further development will increase flood risk, referencing flooding in specific locations. 	<ol style="list-style-type: none"> 1. We are working with the Environment Agency to address the comments made in their Regulation 19 submission through a Statement of Common of Ground (SOCG) as set out in our response to the Inspectors' Initial Question IQ5 (examination library reference LPA02). A summary SOCG has been agreed (examination library reference LPA37). A further SOCG addressing more detailed matters will follow once the SFRA Update and WCS Detailed Report are complete. 2. We have considered the impacts of development on flood risk, at a strategic level, through the Strategic Flood Risk Assessment (examination library references CEQ11, CEQ11.1, CEQ12 and CEQ12.1) which we are currently updating to take into account changes made to the Environment Agency's Flood Map for Planning in March 2025. In addition, Policy CE6 establishes a strong framework for minimising flood risk through development management processes. Part 1b of Policy CE6 specifically requires that development must not increase the risk of flooding elsewhere. Furthermore, Part 3 of Policy CE6 requires site- specific flood risk assessments to demonstrate that flood risk downstream will not be

Policy	Key issues raised	Councils' response to key issues raised
		<p>made worse by development and encourages measures that contribute to a reduction in flood risk downstream.</p>
<p>Policy CE7: Water efficiency</p>	<ol style="list-style-type: none"> <li data-bbox="338 344 994 528">1. Respondents raised concerns that the policy exceeds national requirements as it sets a water efficiency standard for new homes that goes beyond the Building Regulations. <li data-bbox="338 1050 994 1153">2. Respondents raised concerns that there is a lack of evidence or justification for a more ambitious standard. <li data-bbox="338 1198 994 1375">3. Thames Water suggested the policy should require the 'fittings approach' to achieving water efficiency standards, rather than the 'calculation method' which is less effective. 	<ol style="list-style-type: none"> <li data-bbox="1016 344 2125 826">1. All new homes have to meet the mandatory national water efficiency standard set out in the Building Regulations of no more than 125 litres per person per day (lpppd). However, national planning practice guidance allows local planning authorities to set local plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 lpppd if there is a clear local need identified. As evidenced in our Water Efficiency Topic Paper (examination library reference TOP11), we have identified that we are in an area of serious water stress, and in conjunction with the Future Homes Hub recommendations actively advising the government for tighter water efficiency standards, the requirement for no more than 100 lpppd as set out by Policy CE7 is considered entirely justified. It is further justified by the Joint Local Plan Viability Report (examination library reference ITV04) and (examination library reference ITV04.1) which demonstrates the costs of achieving this standard still leads to viable schemes. <li data-bbox="1016 1050 1509 1082">2. See response to point 1 above. <li data-bbox="1016 1198 2125 1342">3. The Building Regulations allow water efficiency requirements to be achieved through either the 'Calculation Method' or the 'Fittings Approach'. Policy CE7 does not prescribe the method or approach. This provides flexibility in reaching the water efficiency level as set by the policy or any

Policy	Key issues raised	Councils' response to key issues raised
		future tighter standard that may replace this.
Policy CE8: Water quality, wastewater infrastructure and drainage	<ol style="list-style-type: none"> 1. The Environment Agency has significant concerns about sewage treatment work capacity and water quality. A detailed Water Cycle Study is needed to show that development can be delivered, supported by sufficient infrastructure, without negative impacts on water quality. 2. Respondents suggested that it is unreasonable to require developers to undertake sewage capacity assessments, as this is the responsibility of the service provider. 3. Respondents suggested that the policy wording regarding water efficiency conflicts with Policy CE7. 	<ol style="list-style-type: none"> 1. As we have set out in our response to Main Issue 9 (examination library reference LPA11), we have assessed sewage treatment work (STW) capacity in the districts through our Water Cycle Study (WCS) Detailed Report, which we are working to submit prior to the next stage of hearing sessions. We have engaged closely with the Environment Agency and Thames Water Limited, the sewerage undertaker for the districts, throughout this process. Our WCS Detailed Report identifies the need for infrastructure upgrades at a number of STWs to accommodate additional wastewater flows resulting from planned development and to protect water quality. Policy CE8 provides a strong framework to ensure alignment between the delivery of new development and infrastructure upgrades. 2. It is important that sewage capacity is also assessed at the planning application stage for major developments, to reflect the latest available data and to ensure that there is sufficient infrastructure capacity available to serve development. Additionally, if capacity issues are identified, it will help to ensure that the delivery of development and infrastructure upgrades are aligned. The councils' validation guide will be updated to set out what applicants will need to submit as part of a sewage capacity assessment. 3. We propose a modification to Part 1 c) of Policy CE8, to ensure consistency with Policy CE7 - Water efficiency and to avoid any possible ambiguity: Development must protect and enhance water quality, including through:

Policy	Key issues raised	Councils' response to key issues raised
	<p>4. Concerns that Grampian conditions could hold up delivery and occupation of homes.</p> <p>5. Concerns that the policy exceeds national requirements, as it requires development to enhance water quality, whilst the NPPF (2023) wording is 'wherever possible'.</p>	<p>c) <u>maximising water efficiency being designed to be water efficient and to minimise water consumption in accordance with Policy CE7 (Water efficiency)</u>; and...</p> <p>4. Part 8) of Policy CE8 is essential to ensure that there is sufficient wastewater infrastructure capacity available to serve development at the time of occupation to avoid the risk of infrastructure becoming overwhelmed and possible negative environmental impacts.</p> <p>5. Policy CE8 states that development must protect and enhance water quality. The NPPF (at paragraph 180e) requires that planning policies should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to unacceptable levels of water pollution, and that, wherever possible, development should help to improve water quality. Our policy is therefore consistent with national requirements.</p>
Policy CE9: Air Quality	<p>1. Concerns that Point 1 exceeds national requirements, as it requires development to enhance air quality, whilst the NPPF (2023) wording is 'wherever possible'.</p> <p>2. Some concerns that the thresholds for requiring Air Quality Assessments are not appropriate and may not be proportionate for some development.</p>	<p>1. Policy CE9 identifies that development must protect and enhance air quality. National policy requires that planning policies should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to unacceptable levels of pollution, including air pollution, and that, wherever possible, development should help to improve air quality. Our policy is therefore in accordance with national requirements.</p> <p>2. Policy CE9 identifies that certain types of development are required to produce Air Quality Assessments. This is justified and evidenced through our Air Quality Developer Guidance for both districts (examination library reference CEQ02) and (examination library reference CEQ02.1). These documents provide clarity for developers on requirements and set out the</p>

Policy	Key issues raised	Councils' response to key issues raised
		minimum standards to ensure robust assessment of air quality impacts.
Policy CE10: Pollution sources and receptors	1. Some respondents raised concerns that requirements around noise and air pollution will limit the scope for development around the A34 and A420.	1. We do not consider Policy CE10 will limit the scope for development around the A34 and A420, provided that applicants appropriately mitigate any noise and air pollution associated with these roads where needed, as required by part 3 a) and c) of the policy.
Policy CE11: Light pollution and dark skies	<p>1. Some respondents expressed concerns about maintaining an appropriate balance between reducing lighting and ensuring safety and security.</p> <p>2. Some respondents expressed concerns the policy is overly lengthy, and prescriptive, particularly in E1 areas.</p>	<p>1. Policy CE11 strikes an appropriate balance between reducing lighting and ensuring safety and security. Part 2 a) of the policy states that for external lighting schemes, the lighting needs to show a clear need and justification, which provides sufficient flexibility for circumstances where lighting is required for safety or security reasons.</p> <p>Additionally, we have Lighting Design Guidance to support this policy (examination library reference CEQ07), which highlights that this balance can be achieved. It states on page 3 that 'there are many simple and cost-effective solutions which can reduce the impact of outdoor lighting on the environment whilst still providing a feeling of safety and comfort by delivering the right amount of light only when and where it is needed'. This guidance will assist applicants in striking the important balance of utilising lighting for safety and security reasons, whilst also keeping lighting to a minimum (i.e. only where it is needed).</p> <p>2. The requirements set out in Policy CE11 provide clarity regarding how applicants can reduce light pollution and conserve dark skies through their developments. The policy can be read with ease and provides the necessary detail for applicants to meet the aims of the policy, which is particularly important in E1 areas as they are the most sensitive to light pollution. When the Lighting Design Guidance (examination library reference CEQ07) is read alongside the policy, applicants will have the required information to reduce light pollution and conserve dark skies. The</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. Some respondents raised concerns that the policy was not appropriately tested in the Viability Report.</p>	<p>policy is also consistent with the NPPF paragraph 191 c), which states that policies should 'limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation', and is therefore justified in its approach.</p> <p>3. The Joint Local Plan Viability Report (examination library references ITV04 and ITV04.1) reviewed Policy CE11, and consultants Aspinall Verdi concluded that it was 'anticipated that design of schemes to meet these requirements will not add any additional costs to a development'. Therefore, this policy will not affect the viability of future development in the districts.</p>
<p>Policy CE12: Soils and contaminated land</p>	<p>1. Some respondents were concerned that requirement for development on Best and Most Versatile (BMV) agricultural land to provide a soil handling plan and sustainable soil management strategy based on detailed soil surveys:</p> <ul style="list-style-type: none"> a. lacks evidence to justify the requirements. b. lack clarity on what developers must provide. c. lacks flexibility. 	<p>1. Regarding concerns around Best and Most Versatile agricultural land:</p> <ul style="list-style-type: none"> a. We consider the requirements to be justified given that BMV agricultural land is a finite natural resource which provides a range of important ecosystem services, including for food security. The policy approach aligns with Natural England's recommendations at Regulation 18 (Part 2) and the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. b. We could provide additional detail on what applicants need to provide in the councils' validation requirements or in a guidance note, as is done for other developer requirements (such as Air Quality Impact Assessments). c. We propose the following modifications to criteria one of Policy CE12: <ul style="list-style-type: none"> '...Proposals for development <u>that are likely to result in the loss of 20 hectares or more of</u> the best and most versatile agricultural land and which are not allocated in the Joint Local Plan or a made

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Concerns that the policy does not align with the NPPF (2023).</p>	<p><u>Neighbourhood Plan</u> must include a soil handling plan and sustainable soil management strategy based on detailed soil surveys'.</p> <p>The proposed modifications would help to ensure that requirements for soil handling plans and sustainable soil management strategies are proportionate. The thresholds proposed align with the circumstances when Natural England is a statutory consultee for planning applications, as set out in Schedule 4 paragraph (y) of the Development Management Procedure Order 2015. This is appropriate as Natural England has the specialist expertise required to assess these documents and Natural England requested these requirements in their Regulation 18 (Part 2 – preferred options) consultation response.</p> <p>2. Paragraph 180 of the NPPF (2023) states that planning policies should recognise the economic and other benefits of the BMV agricultural land. In addition, paragraph 181 states that plans should allocate land with the least environmental or amenity value, where consistent with other policies in the framework, with footnote 62 clarifying: 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development'. Our approach in Policy CE13 aligns with, and builds upon, these NPPF requirements. Whilst NPPF footnote 62 only applies to the allocation of land in plan-making, the JLP extends this approach as we also consider it important to protect against the possible significant loss of BMV agricultural land to windfall development, particularly in two predominantly rural authority areas.</p>

Policy	Key issues raised	Councils' response to key issues raised
	3. Specific concerns about contaminated land at Dalton Barracks.	3. The Dalton Barracks Garden Village site allocation Policy AS10 signposts to the adopted Dalton Barracks SPD (examination library reference OCD11) which at paragraph 3.38 states: 'The extent of contamination is unknown, but it is anticipated that this could cause constraints to some areas of the allocated site'. Any development at this site would need to satisfy the requirements of Policy CE12 related to contaminated land. Specifically, land contamination would need to be assessed and, if appropriate, remediation and/or mitigation may need to be provided.
Policy CE13: Minerals safeguarding areas	No key issues raised.	N/A

Chapter 5: Spatial strategy and settlements

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 5	<ol style="list-style-type: none"> 1. Some respondents raised concern that: <ol style="list-style-type: none"> a. the plan does not support Neighbourhood Plans. b. the focus on Science Vale has been removed after Regulation 18, although other respondents felt there was too much focus on Science Vale. 2. Comments raised regarding the Green Belt, suggesting that the plan should: <ol style="list-style-type: none"> a. show where Green Belt has been previously released. 	<ol style="list-style-type: none"> 1. We have explained the support our plan and dedicated team provide to neighbourhood plans in our response to the Main Issue 3 (examination library reference LPA11). Within that response we also set out our strategy's continuing focus on Science Vale and the reasons for it, following the consideration of alternatives. 2. In response to part a, this Joint Local Plan does not intend to release Green Belt, and it would not be justified to confuse our policy map by showing land already removed from the Green Belt by the current adopted Local Plans. In response to part b, there are no Green Belt releases

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. confirm for transparency whether any more Green Belt is proposed to be released.</p>	<p>proposed by the JLP. This is clear from Policy SP1 (Spatial strategy) paragraph 2.</p>
<p>Policy SP1: Spatial strategy</p>	<p>1. Significant support noted for the strategy and particular elements of it like the focus on Science Vale, although other respondents raised concern about over-supply or over-concentration of growth in Science Vale.</p> <p>2. Policy should be relying less on strategic and windfall sites and more on market towns or other smaller settlements. Respondents raised concern that the strategy might limit the ability for settlements to grow and thrive (and may make them less sustainable).</p>	<p>1. We have explained the justification for the spatial strategy focus at Science Vale following the consideration of alternatives in our response to Main Issue 3 – spatial strategy (examination library reference LPA11).</p> <p>2. The spatial strategy supports development in market towns and other settlements, as appropriate to their tier and role. These include our two largest towns which scored top of the Settlement Hierarchy - Abingdon and Didcot (examination library reference TOP05.2) and are also within Science Vale. It wouldn't be appropriate to direct more development adjacent to small settlements as part of a dispersed pattern of growth. We tested this as an alternative through our Sustainability Appraisal. Our Spatial Strategy Topic Paper (examination library reference TOP08.2) explains why a dispersed growth pattern that would allow more development at smaller settlements is not preferred. In summary, this would have significantly poorer predicted sustainability effects than the preferred strategy, with only one Sustainability Appraisal objective (SA Objective 9 – To plan for enough housing to meet the needs of our residents, including the provision of affordable housing) showing a predicted overall positive effect. A dispersed pattern of growth would lead to more homes in locations where there are fewer jobs, services and facilities. That strategy would be less likely to support a shift to more sustainable modes of transport including active travel like walking and cycling. The spatial strategy supports development of various types in Tiers 1 to 3 settlements. Villages that are Tier 4 settlements with limited</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. Many respondents promoted sites across the district, including sites within or near to the Tier 1 settlements with further representations made against those individual policies.</p> <p>4. Other sites were promoted in lower tier settlements, with concern raised about alignment with the spatial strategy. For instance:</p> <ul style="list-style-type: none"> a. various concerns were raised about the limitations of what brownfield land delivery is likely given the nature of the districts, the available brownfield land, and viability concerns. b. respondents identified specific areas or sites to be removed from the Green Belt, or the need to review the Green Belt generally is justified to accommodate more development. <p>5. Concern about the strategies outcome of having an over-reliance on larger sites</p>	<p>services and facilities are supported to bring forward development within their built-up area or replacement dwellings or sub-division of dwellings. It is only the open countryside where more development is not supported (unless supported by other policies in the development plan).</p> <p>3. Our site selection process and the consideration of alternatives is appropriate and compliant with national policy. Please see our response to Main Issue 6 (examination library reference LPA11) and our response to the Inspector's Initial Questions, IQ46 (examination library reference LPA02, paragraph IQ46.18).</p> <p>4. We have not directed growth to the lower tier settlements in the spatial strategy for the reasons summarised in our response to Main Issue 3.</p> <ul style="list-style-type: none"> a. Please see our answer to point 3 (General comments on Chapter 3) regarding brownfield land availability. b. The spatial strategy protects the Green Belt in line with national policy (specifically paragraph 145 of the NPPF) which states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. <p>5. There is a sufficient supply of homes and jobs in the JLP, and there are no exceptional circumstances to justify amendments to the Green Belt. There is no explicit strategy within Policy SP1 that requires us to rely upon larger</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>rather than smaller ones and their risk of delay.</p> <p>6. Concern that more focus is needed in the strategy to meet further unmet needs of Oxford, with effective cooperation required to inform the strategy.</p> <p>7. Criticisms of the role of Neighbourhood Plans, either being over-relied upon or not relied upon enough.</p>	<p>sites at the expense of smaller sites. There are several existing allocations on larger sites which we tested against reasonable alternatives (see the Site Selection Topic Paper – examination library reference TOP07.1). The spatial strategy acknowledges that the sites that remain deliverable within the plan period will continue to come forward. There are no new reasons for delay arising since those sites were allocated. The strategy also encourages smaller sites to deliver on brownfield sites within settlements which are not usually larger scale sites.</p> <p>6. Policy SP1 makes it clear that all the previously agreed unmet housing need of Oxford will remain provided for. The JLP allocates sufficient sites near to Oxford to deliver this. Despite some respondents suggesting policy SP1 should enable more sites to come forward to meet more unmet need for Oxford, there is no evidence to justify this, given the outcome of Oxford's examination in 2024.</p> <p>7. Neighbourhood Plans are supported by Objective 1 of the JLP. The spatial strategy takes a different approach to Neighbourhood Development Plan (NDP) delivery from the existing local plans, because we have no need to set housing requirements for each settlement. The delivery of homes through NDPs has been successful and rewarding for communities, especially where projects are delivered alongside housing development. Policy SP1 is a strategic policy setting a framework to support the continuation of NDPs and any local community ambitions. This approach is in accordance with national policy, particularly paragraph 13 of the NPPF which states that Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>8. SA assessment of spatial strategy options is flawed, particularly with respect to option B and the assessment of alternatives.</p>	<p>8. The Sustainability Appraisal (examination library reference CSD03) is not flawed. It was undertaken by consultants who have provided a professionally judged assessment of alternatives for the spatial strategy which we have considered when we were developing the strategy. The Sustainability Appraisal at section 5.1 explains the alternatives for the strategy, and Appendix F has a specific assessment of alternatives for the spatial strategy. Four alternative options were assessed. Paragraph 5.13 explains how option B performed and Appendix F contains a score against each objective alongside a narrative explaining how each option performed against each objective. The preferred option A is justified by the Sustainability Appraisal.</p>
<p>Policy SP2: Settlement hierarchy</p>	<p>1. Disagreement with classification of a number of individual settlements, with respondents stating that the settlement tier is too high, and others stating that a settlement is located too low in the hierarchy.</p> <p>2. Respondents raised concern that the strategy might limit the ability for settlements to grow and thrive (and may make them less sustainable).</p> <p>3. The policy is too restrictive, citing:</p> <ul style="list-style-type: none"> a. the need for development in more tiers. b. more development should be allowed within each individual tier. 	<p>1. The methodology and the decisions taken when we produced the settlement hierarchy and decided where each settlement was to be placed in the hierarchy, is fully justified in our Settlement Assessment and Hierarchy Topic Paper (examination library reference TOP05.2).</p> <p>2. We have explained the approach to smaller settlements in our response to Main Issue 3 – spatial strategy (examination library reference LPA11).</p> <p>3. (a-e) Development is directed within all Tiers (Tiers 1 – 4); it is only the open countryside where more development is not supported (unless supported by other policies in the development plan). The types of development considered to be acceptable within the tiers of the settlement hierarchy are in conformity with the spatial strategy. The Spatial Strategy Topic Paper (examination library reference TOP08.2) sets out what</p>

Policy	Key issues raised	Councils' response to key issues raised
	<ul style="list-style-type: none"> c. development should not be limited to within the built-up area. d. some development is needed in the countryside. e. does not support the presumption in favour of sustainable development in the NPPF (2023). <p>4. Concern that there is an over-reliance on large sites and brownfield sites, citing:</p> <ul style="list-style-type: none"> a. the limitations of what brownfield land delivery is likely, given the nature of the districts, the available brownfield land, and viability concerns. b. it would be more appropriate to deliver a mix of sites. <p>5. The policy is not consistent with Policy SP1 in that the local plan housing allocations have not been considered within the context of the settlement hierarchy and the allocations and their potential have not been incorporated within the hierarchy.</p>	<p>alternative options were considered, including further greenfield expansion of existing settlements and a more dispersed pattern of development, and why these alternatives are not our preferred strategy. Our spatial strategy has been developed in accordance with national policy and therefore we do not consider it necessary to modify the plan. Our Settlement Assessment and Hierarchy Topic Paper (examination library reference TOP05.2) discusses the relevant policy context, including the definition of sustainable development in the NPPF. The Topic Paper then sets out how our settlement hierarchy reflects this core principle, including through promoting the vitality of the larger urban areas while recognising the intrinsic character and beauty of the countryside and smaller villages.</p> <p>4. (a-b) On brownfield land availability and large sites, please see our responses to General comments on Chapter 3 and to Policy SP1 key issues 4 and 5 above. Our response to Policy SP1 key issue 5 confirms that the strategy supports a mix of sites.</p> <p>5. The housing allocations are in line with our spatial strategy. The Settlement Assessment and Hierarchy Topic Paper (examination library reference TOP05.2) advises that the role of the assessment is to provide a hierarchy of settlements based upon the current level of provision of services and infrastructure, and therefore the hierarchy classifications take account of existing services/facilities, rather than what may be in place in the future.</p>

Policy	Key issues raised	Councils' response to key issues raised
	6. Failure to plan for additional growth around edge of Oxford and Reading.	6. Our Settlement Assessment and Hierarchy Topic Paper (examination library reference TOP05.2) sets out that proximity to Oxford, Swindon and Reading was accounted for within the settlement assessment methodology. However, land bordering Oxford, Reading and Swindon is within the countryside and therefore not appropriate unless specified/supported within other policies. Our response to Policy SP1 key issue 6 makes it clear that all the existing unmet housing need of Oxford will remain provided for.
Policy SP3: The strategy for Didcot Garden Town	1. Concern there is not enough development to realise the vision for Didcot.	1. There are several existing allocations and other sites with planning permission which haven't yet come forward within Didcot and the surrounding area. The expected supply for Didcot over the JLP plan period is 9,109 new dwellings, excluding windfall developments. Didcot is a key town within the Science Vale area, and it is a focus for development in this JLP. We consider the level of growth proposed is appropriate for this focus and to ensure the scale of development supports the vision for the town. The vision for Didcot is set out generally in the spatial strategy and specifically addressed in Policy SP3. There are no specific elements of the strategy for Didcot (in Policy SP3) which don't align with the planned development that is still to come forward within the town. All the elements of the strategy for Didcot in Policy SP3 align with the planned development which is still to come forward within the town.
Policy SP4: A strategy for Abingdon-on-Thames	1. Concerns that Abingdon needs more housing and employment allocations, although other respondents raised concern about the traffic implications of further growth.	1. Policy SP4 reflects the spatial strategy set out in Policy SP1, as it relates to Abingdon. Abingdon is our highest rated settlement in the settlement hierarchy (examination library reference TOP05.2) in terms of services and facilities. It is a Tier 1 settlement within the Science Vale, which makes Abingdon a focus for development. This means a presumption in favour of sustainable development exists within the built-up area. There are also two large allocations close to Abingdon: at Culham and Dalton Barracks. There are current Local Plan allocations at Abingdon listed at Appendix 5

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Concern that policy doesn't address potential impact of forthcoming Thames Water reservoir.</p> <p>3. Various additional specific environmental aims and references are suggested for this policy.</p>	<p>of the JLP, because those sites have not yet been fully built out. There is also a Neighbourhood Plan in development at Abingdon, which is preparing for submission. It doesn't choose to allocate more sites, but it suggests brownfield sites that would come forward to support walkable neighbourhoods. Employment re-developments are also encouraged within the town, and there are employment allocations surrounding Abingdon in the wider Science Vale which will provide a supply of employment land locally. Abingdon is one of our districts most demand generating areas for traffic movements (see the Existing Transport Conditions Report - examination library reference ITV01). Interventions to encourage traffic generators to choose sustainable methods have been identified, such as in the adopted Abingdon Local Cycle and Walking Infrastructure Plan. The new Lodge Hill south facing slip roads onto the A34 (granted planning approval in September 2023, construction currently underway) has the potential to benefit traffic movements across Abingdon.</p> <p>2. In Policy SP4 for Abingdon, it would be premature to include content related to a potential scheme with no certainty nor evidence of the impact and mitigation required in Abingdon. At this stage, Policy IN7 South East Strategic Reservoir Option (SESRO) safeguarding is an appropriately justified policy for the potential reservoir.</p> <p>3. Policy SP4 refers to various evidence base documents for applicants to consider, which will have specific aims and targets for development to achieve. However, the development plan should be read whole and other environmental policies within the JLP refer to specific aims, which don't need repeating in Policy SP4.</p>
Policy SP5: A strategy for Faringdon	1. Concerns that Faringdon needs more housing allocations, with more housing	1. Policy SP5 reflects the spatial strategy set out in Policy SP1, as it relates to Faringdon. Faringdon is a Tier 1 settlement, which means a presumption in favour of sustainable development exists within the built-up

Policy	Key issues raised	Councils' response to key issues raised
	<p>required after the end of the current NDP period.</p>	<p>area. There are current Local Plan allocations at Faringdon listed at Appendix 5 of the JLP, because those sites have not yet been fully built out. As such we don't consider it necessary to allocate additional sites.</p>
<p>Policy SP6: A strategy for Henley-on-Thames</p>	<p>1. Concerns that Henley needs more housing allocations (particularly more affordable housing) or NDP needs to plan for more, although other respondents did not feel more housing was required.</p>	<p>1. Policy SP6 reflects the spatial strategy set out in Policy SP1 as it relates to Henley-on-Thames. Henley is a Tier 1 settlement, which means a presumption in favour of sustainable development exists within the built-up area. There is also a made Joint Neighbourhood Plan Review for Henley and Harpsden, which has allocated housing sites. As such we don't consider it necessary to allocate additional sites. Affordable housing would be required in Henley-on-Thames that meets the requirements of JLP Policy HOU3 (Affordable Housing).</p>
<p>Policy SP7: A strategy for Thame</p>	<p>1. Concern about conflicts between the policy and the emerging Thame NDP, particularly with respect to the Primary Shopping Area designation.</p> <p>2. Concern that Thame needs more housing allocations or NDP needs to plan for more.</p>	<p>1. The conflict referred to relates to Thame Cattle Market, with the respondent wanting the Primary Shopping Area to be extended to cover a proposed food store supported by the NDP. The Primary Shopping Area is established by JLP policy TCR2 (Strategy for town and local service centres) not Policy SP7. Policy TCR2 directs new retail to either Primary Shopping Areas or Town Centres. The definition of the Primary Shopping Area boundaries was undertaken factoring in the function of the uses and what needs to be protected for continued retail use. The current use at this site does not justify inclusion in the Primary Shopping Area. However, there is no conflict with the potential new retail use at the Cattle Market because Policy TCR2 supports new retail in both Primary Shopping Areas and within the Town Centre. Policy SP7 supports the need to strengthen Thame's retail offer in the town centre at part 2 of the policy.</p> <p>2. Policy SP7 reflects the spatial strategy set out in Policy SP1, as it relates to Thame. Thame is a Tier 1 settlement, which means a presumption in favour of sustainable development exists within the built-up area. There is also a recently made Thame Neighbourhood Plan 2 which included</p>

Policy	Key issues raised	Councils' response to key issues raised
		housing allocations to meet an identified need for housing set out in both the adopted South Oxfordshire Local Plan and in part a of Policy SP7. As such we don't consider it necessary to allocate additional sites.
Policy SP8: A strategy for Wallingford	<ol style="list-style-type: none"> 1. Concern about conflicts between the policy and the Wallingford NDP review. 2. Concern that Wallingford needs more housing allocations or NDP needs to plan for more, although other respondents raised concern about the existing amount of new development and corresponding infrastructure capacity. 	<ol style="list-style-type: none"> 1. The conflicts raised by respondents are regarding Policy SP8 part 1 e (v) and the aspiration in the Wallingford Neighbourhood Plan to create new pedestrian and cycle links to Cholsey railway station. The respondents query how it can be delivered. However, this is not a conflict, the aspirations of the NDP and the policy are aligned. Policy SP8 seeks any opportunity to enhance those links. 2. Policy SP8 reflects the spatial strategy set out in Policy SP1, as it relates to Wallingford. Wallingford is a Tier 1 settlement, which means a presumption in favour of sustainable development exists within the built-up area. There are current Local Plan allocations at Wallingford listed at Appendix 5 of the JLP, because those sites have not yet been fully built out. There is also a recently made Neighbourhood Plan for Wallingford which allocates housing sites and meets the adopted local plan's housing requirement for the town of 1,070 homes. As such we don't consider it necessary to allocate additional sites.
Policy SP9: A strategy for Wantage	No key issues raised.	N/A

Chapter 6: Housing

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 6</p>	<p>1. Some respondents were concerned the plan's housing requirement is not high enough, citing it doesn't:</p> <ul style="list-style-type: none"> a. align with economic growth aspirations. b. address unmet housing need from Oxford in full. c. align with proposed changes to the NPPF and the proposed new Standard Method. 	<p>1. (a-c) As stated in our response to Main Issue 4 (examination library reference LPA11) our approach to, and justification for, the housing requirement in the plan is set out in paragraphs 4.1 to 4.10 of the Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper (examination library reference TOP03.2). This matter is also covered in our written statement on the housing requirement for the Stage 1 hearings (examination library reference WS3/1). The Sustainability Appraisal of the JLP at both preferred options (examination library reference LPP03 – Table 4.4) and proposed submission stages (examination library reference CSD03 – Table 4.4) considered four alternatives for the districts' housing requirements. Two of these options (option b: maintaining the existing levels of housing need, and option d: reflecting the Oxfordshire Growth Deal in a new housing needs assessment) tested alternative housing requirements higher than those in HOU1. Furthermore, we also tested a lower housing requirement of just following the standard method, without an uplift for the agreed unmet need (option c).</p> <p>As we set out in detail in the Housing Topic Paper referenced above, Paragraph 61 of the NPPF is clear that local authorities should use the standard method for assessing local housing need unless there are exceptional circumstances for doing so. We don't believe such circumstances exist. The Inspectors for the Oxford Local Plan 2040 examination reached a conclusion that is consistent with our position: 'there is no justification for moving away from the standard method for identifying the local housing need for Oxford City' (examination library reference LNP05, paragraph 64). We therefore believe that the JLP has planned for a sound housing need and requirement.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. As a result of concerns regarding Housing requirement the supply should be increased to align with the actual need.</p> <p>3. Others commented that supply of housing in plan should be reduced as it significantly exceeds housing need / requirement.</p> <p>4. Some comments were received raising concern about compliance with the Duty to Co-operate, these included:</p> <p>a. highlighting issues raised at the examination of the Oxford City Local Plan.</p>	<p>The examination is considering the JLP against the December 2023 NPPF, as set out in the transitional arrangements of the December 2024 NPPF. Therefore, a housing requirement based on the pre-2024 standard method is sound.</p> <p>2. The councils believe the housing requirement is sound, and so the housing supply does not need to increase. However, we expect more homes than the housing requirement to come forward in the plan period. In South Oxfordshire, we expect to deliver 19,978 homes against a requirement of 16,530 (a surplus or headroom of 3,448 homes), and in the Vale of White Horse we expect to deliver 19,779 homes against a requirement of 14,490 (a surplus or headroom of 5,289 homes). We therefore don't believe the housing supply needs to be supplemented with additional sites.</p> <p>3. The aforementioned projected supply of housing provides an important headroom above the housing requirement, which is necessary to mitigate any potential delays to one or more of the large-scale housing allocations. These site allocations are large and they require infrastructure to be secured to enable development to proceed as anticipated. Without this size of contingency buffer in place, there would be a greater likelihood that infrastructure delivery problems and delivery delays would jeopardise the overall delivery of the plan.</p> <p>4. (a-c) We have set out in detail how we have engaged with our neighbouring councils in our response to questions 7 to 17 of the Inspector's Initial Questions (examination library reference LPA02, pages 5 to 25). This demonstrates that we have engaged continuously with neighbours in relation to the strategic matters covered under the duty to cooperate. The councils have signed statements of common ground with both Reading Borough Council (examination library reference DUC07) and</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. the plan fails to address unmet need from neighbouring authorities (Oxford and Reading).</p> <p>c. concerns about a lack of Statements of Common Ground.</p> <p>5. Some respondents were concerned about a lack of small and medium sites and a reliance on large scale development to meet the overall housing need and needs of specific groups.</p>	<p>Oxford City Council via a joint Oxfordshire Authorities statement (examination library reference DUC01). During July 2025, we signed a bilateral statement of common ground with Oxford City Council (examination library reference LPA38)</p> <p>5. The councils have submitted housing land supply statements for each district which demonstrate a 5-year land supply for each district; 5.59 years in South Oxfordshire and 7 years in the Vale of White Horse (examination library reference OCD08.1 – South Oxfordshire and OCD09.1 - Vale of White Horse). The latest housing trajectory for the plan in the proposed modifications (modification numbers MM06 and MM07, examination library reference CSD01.1) includes a breakdown of our expected housing delivery over the plan period. For South Oxfordshire, there is only one future year where housing delivery falls slightly below the requirement (2031/32), but this is offset by most other years far exceeding this. In the Vale of White Horse, housing delivery is consistently above the requirement until 2039, where supply marginally drops below the requirement. However, again, this is mirrored by years of significant over delivery prior to this. For both councils, the trajectories demonstrate a consistent meeting, or exceeding, of the housing trajectory for the vast majority of the plan period.</p> <p>There are a number of large housing sites in the plan which will deliver in the medium to long term (where they don't already have permission or are building out). However, there is a significant supply in both districts from both large and small sites in the short term, and there are policies in the plan that support the delivery of windfall sites throughout the plan period. The total supply significantly exceeds the total requirement in both districts, by 24% in South and 35% in Vale, which mitigates against the impacts of delivery issues that a large site or sites may experience. The</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>6. Concern was raised about the suitability of specific sites ('land east of Sutton Courtenay' and 'Land Adjacent to Culham Campus').</p> <p>7. Other sites were promoted.</p>	<p>plan provides a 5 year land supply from the intended date of adoption (December 2025) in line with the requirement of NPPF paragraph 69. Beyond this, we are confident that the housing supply in each district will continue to provide the councils with a rolling 5 year housing land supply.</p> <p>On meeting the needs of specific groups set out in Paragraph 63 of the NPPF, we believe that the plan appropriately assesses and reflects the needs of these different groups, as demonstrated within the Joint Housing Needs Assessment (examination library reference HES15.1). The policies overall provide a combination of specific, identified sites to address needs, as well as providing a positive framework for other sustainable sites to come forward across the plan period.</p> <p>6. The Site Selection Topic Paper (examination library reference TOP07) sets out how we have assess the sites that form part of our housing supply over the plan period. We believe all the sites allocated in the JLP are suitable, achievable, and developable in the plan period.</p> <p>7. The JLP contains a housing supply which exceeds the housing requirement, and so we don't need to allocate any further sites for housing development. However, there are mechanisms in the plan for Neighbourhood Development Plans to allocate further sites (if they wish to do so), and support for speculative applications that are aligned with the spatial strategy.</p>
Policy HOU1: Housing requirement	<p>1. Many respondents don't agree with the housing numbers proposed in the plan, because they think the need is greater, citing:</p>	<p>1. The NPPF and PPG are clear that local planning authorities should not depart from the standard method for assessing local housing need unless there are exceptional reasons for doing so. We have set out our explanation that there are no exceptional reasons for the JLP to depart from the standard method in the Housing Requirement, Affordable Housing and Gypsies, Travellers and Travelling Showpeople Topic Paper</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>a. they think more unmet need should be accounted for – either from Oxford or other adjacent authorities (e.g., Reading and Swindon).</p> <p>b. it should draw from the HENA / OGNA.</p>	<p>(examination library reference TOP03.2). This matter is also covered in our written statement on the housing requirement for the Stage 1 hearings (examination library reference WS3/1). The housing requirement does not need to be greater, because:</p> <p>a. There are no further unmet needs to be accounted for, as the policy already includes an uplift for each district to address the agreed unmet need for Oxford that is in our existing, adopted Local Plans (netting off 2 years of need and completions in Vale of White Horse that occur before the start of the JLP period). We have not agreed any further unmet need under the duty to cooperate process from Oxford or other adjacent authorities, and there are currently no adopted or emerging local plans with unresolved unmet needs for the JLP to accommodate.</p> <p>b. The JLP was not required to draw from the emerging Oxfordshire Growth Needs Assessment (OGNA), as this was being developed as part of the joint working on the Oxfordshire Plan 2050, which came to an end in August 2022. Whilst the OGNA was in preparation we had technical concerns about its accuracy, for example, on inputs such as work from home allowances, economic growth rates, and household formation rates, which are fundamental to the appropriateness and accuracy of the study. For more information on our concerns about the OGNA, please see our answer to the Inspectors' Initial Questions (examination library reference LPA02, paragraphs IQ13.1- 13.6) and accompanying evidence in Appendix 1 Table of Engagement (examination library reference LPA02.1) and Appendix 2 Evidence of Engagement (examination library reference LPA02.2). We have also not drawn from the Oxford City Council / Cherwell District Council Housing and Economic Needs Assessment (HENA) as the basis for our housing needs, as we had similar technical concerns with this document as with the OGNA (set out at examination library reference LPA02, paragraphs</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. there should be more to accommodate employment growth / or more evidence to demonstrate a sustainable balance between the two.</p> <p>d. the plan should plan for the proposed new standard method.</p> <p>e. more housing is needed to meet affordable housing needs.</p>	<p>IQ13.7- 13.8). The HENA was ultimately criticised by the Inspectors for Oxford's previous emerging Local Plan 2040: 'the robustness of the HENA is questionable, and its recommendations flawed. The approach to housing need is not justified and therefore the Local Plan is not sound in this respect.' (examination library reference LNP05, paragraph 61). If we used the OGNA or HENA as the basis for our housing needs, it would be based on a questionable and unsound evidence base.</p> <p>c. The Joint Housing Needs Assessment (examination library reference HES15.1, paragraph 4) confirms that there is no requirement to have a higher housing target to accommodate the projected growth in the workforce. We provided a response to this key issue in our answer to the Inspectors' Initial Questions (examination library reference LPA02, pages 71-73, paragraphs IQ56.1-IQ56.8), which in summary demonstrates that the JLP housing requirement will yield a surplus of 4,553 economically active persons, and thus the housing requirement is more than fully consistent with our jobs' growth forecast. It achieves a sustainable balance between homes and jobs and does not require any adjustment. As an action point after the Stage 1 hearings, we also tested the balance under the ELNA hybrid scenario, as shown in examination library reference LPA34.</p> <p>d. As we submitted the plan within the transitional arrangements of the December 2024 version of the NPPF, it will be examined in line with the December 2023 version of the NPPF (and associated standard methodology for assessing local housing need), as confirmed by the Inspectors (examination library reference ID01).</p> <p>e. Across the plan period, we expect the sites in the JLP to deliver around 5,600 affordable homes in each district. This is a snapshot of supply between 1 April 2021 and 31 March 2041, based on the trajectories we</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>f. average housing completions in the past have exceeded the standard method figure.</p>	<p>submitted with the plan, and may change over time. The supply comes from a combination of affordable homes delivered to date, sites with planning permission (and the associated number of affordable homes in section 106 agreements), neighbourhood development plan allocations, and JLP allocations. Figures 88 and 90 of the Joint Housing Needs Assessment (examination library reference HES15.1) identify a minimum affordable housing need of 2,899 and 3,953 homes in South Oxfordshire and Vale of White Horse respectively. The plan therefore exceeds the minimum affordable housing need in each district. To meet our plan objectives, we are seeking to do more than the minimum by addressing those in less acute categories of affordable housing need as well.</p> <p>f. The PPG suggests that in situations where previous levels of housing delivery are significantly greater than the outcome from the standard method, there may be the need to plan for a higher level of need than the standard method suggests.</p> <p>For Policy HOU1, using the standard methodology for South Oxfordshire results in 16,530 dwellings to be provided over the plan period. When this figure is not stepped as it is in Policy HOU1, this would result in a need for 827 dwellings per annum. Since 2011, South Oxfordshire has delivered an average housing completion of 865 dwellings per annum (South Oxfordshire Authority Monitoring Report 2022-2023, examination library reference LPA14). These figures are broadly consistent with one another.</p> <p>For Vale of White Horse, the standard method results in 14,490 dwellings to be provided over the plan period. When this figure is not stepped as it is in Policy HOU1, this would result in a need for 725 dwellings per annum. Since 2011, Vale has delivered an average</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>g. two years of contribution towards unmet need between 2019 and 2021 should not be deducted from the Vale of White Horse housing requirement.</p>	<p>housing completion of 1,062 dwellings per annum (Vale of White Horse District Council Authority Monitoring Report 2022-2023, examination library reference OCD07.1). These figures indicate that previous average housing completions exceeded the standard method figure by 337 dwellings per annum. Although previous levels of housing delivery are greater than the outcome from the standard method for Vale of White Horse, the councils do not believe that this alone is an exceptional circumstance for departing from the standard method.</p> <p>g. We provided a response to this key issue in our answer to the Inspectors' Initial Questions (examination library reference LPA02, page 22, paragraph IQ15.7). The response addressed the justification for deducting two years of contribution towards unmet need between 2019 and 2021. The response is as follows:</p> <p>'We agreed to deliver unmet need from Oxford for both councils in the adopted Local Plans. This was in part delivered for the Vale of White Horse during 2019 and 2021. Our position is that we have delivered homes in 2019/20 and 2020/21, including on sites in the Abingdon-on-Thames and Oxford Fringe sub area (a sub area identified in the adopted Vale of White Horse Local Plan 2031), and that 2019 to 2021 falls before the start of JLP's plan period'.</p> <p>Further on, at our response to Inspectors' Initial Question 58 (examination library reference LPA02, paragraph IQ58.3), we have provided a table showing that completions for Vale of White Horse in 2019/20 and 2020/21 were above the requirement, with a surplus of +285 homes delivered. There is no outstanding requirement or undersupply to consider. The two years before the start of the JLP period are correctly deducted from the Oxford unmet need.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Other respondents either agreed with the housing numbers or felt the housing numbers were already too high, with some feeling the policy includes too much unmet need for Oxford.</p> <p>3. Concern about the alignment with the current and emerging NPPFs, including whether sufficient assessment of housing need has been undertaken and if the justification exists to depart from the existing standard method.</p> <p>4. Concerns about the plan period starting in 2021 (prior to adoption).</p>	<p>2. The housing requirement has been calculated using the standard method and includes the unmet need from Oxford as agreed within the adopted Local Plans. Oxford's (adopted) Local Plan 2036 is the plan that exported the unmet housing need into South Oxfordshire and Vale of White Horse. All the agreed unmet housing need of Oxford remains provided for in the JLP, with the JLP allocating sufficient sites near to Oxford to address this need. Oxford City Council is working on a new plan proposing to cover the period to 2042 and we will continue to work closely with Oxford on unmet housing need as they establish any new figures.</p> <p>3. Please see our response to 1(d).</p> <p>4. The JLP plan period is from 2021 to 2041. The period starts in 2021 as this is the year that the preparation of the JLP began and is the base year for the evidence base that supports the plan.</p>
Policy HOU2: Sources of housing supply	<p>1. Concern about an overreliance on large sites, which may impact short term housing delivery.</p>	<p>1. There are a number of large housing sites in the plan, some already have permission or are building out (for example Land at Bayswater Brook, Didcot Northeast, Grove Airfield, Valley Park), others will deliver in the medium to long term. Together they provide a healthy pipeline of new homes. There is a significant supply in both districts from both large and small sites in the short term and there are policies in the plan that support the delivery of windfall sites throughout the plan period. The total supply significantly exceeds the total requirement in both districts, by 24% in South and 35% in Vale, which mitigates against the impacts of delivery issues that a large site or sites may experience. The plan provides a 5-</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. There is a lack of evidence on:</p> <ul style="list-style-type: none"> a. the breakdown of the overall supply. b. the contribution from small sites. c. reliance on windfall sites. <p>3. Concern that there isn't enough housing supply because respondents felt the plan need is too low, although some</p>	<p>year land supply from the intended date of adoption (December 2025) in line with the requirement of NPPF paragraph 69. Beyond this, we are confident that the housing supply in each district will continue to provide the councils with a rolling 5-year housing land supply.</p> <p>2. Our evidence for these points is as follows:</p> <ul style="list-style-type: none"> a. Appendix 3 of the Housing Requirement, Affordable Housing and Gypsies, Travellers and Travelling Showpeople Topic Paper (examination library reference TOP03.2) sets out a site-by-site breakdown of every site contributing within the plan period. b. Paragraph 3.9 of the Site Selection Topic Paper (examination library reference TOP07.1) explains how much of our housing supply is made of up of small sites consisting of less than 1ha. For South Oxfordshire, this totals 1,977 homes on small sites, and for Vale of White Horse it is 2,594 homes. In both districts, our supply of small sites exceeds the national requirement of 10% as detailed in the NPPF September 2023. c. As identified in the Housing Topic Paper (examination library reference TOP03.2, page 32, paragraph 4.18), our five-year housing land supply statements contain the justification for the windfall allowance made in each district, based on the latest data (examination library references OCD08, OCD08.1, OCD09 and OCD09.1). Policy HOU2 identifies 13% of South Oxfordshire's supply resulting from windfall, and 14% of supply in the Vale of White Horse resulting from windfall. Our expected supply from windfall sites is therefore research-based, evidenced and justified. <p>3. Please see our response above to the key issues for Policy HOU1 for our views on a higher or lower housing requirement. The supply identified in Policy HOU2 ensures that there is a sufficient supply of homes to meet</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>respondents felt that the housing supply should be decreased, as there is a significant over supply against the requirement.</p> <p>4. Allocated / carried forward site should be removed or amended.</p> <p>5. Supply from sites completed prior to adoption of the plan should not be included (following from comments on the housing requirement that the plan period should not pre-date adoption).</p> <p>6. Other sites were promoted.</p>	<p>and exceed our needs over the plan period, as well as ensuring choice and competition in the housing market.</p> <p>4. The JLP's supply includes existing allocations from our adopted plans to help guide the determination of reserved matters / discharge of conditions, as well as in case any new or varied plans are submitted for sites that are under construction or yet to start construction. Further explanation on this matter is included in our response to the Inspectors' Initial Questions (examination library reference LPA02) at IQ1.</p> <p>5. As the plan period runs from 2021 to 2041, we have included committed housing supply and delivery since 1 April 2021 in our housing supply.</p> <p>6. The Site Selection Topic Paper (examination library reference TOP07) reviews the process through which the sites for the JLP have been selected, assessed and tested. The sites we have selected for allocation meet our housing and employment needs in full and provide a surplus supply for both in each district.</p>
Policy HOU3: Affordable housing	<p>1. Cumulative effect of policies in the plan make development unviable, e.g., affordable housing.</p>	<p>1. The Joint Local Plan Viability Report (examination library reference ITV04) and Appendices (examination library reference ITV04.1) provide a robust and sound evidence base for the Joint Local Plan. The assessment demonstrates the plan as a whole is deliverable and that the policy requirements (including affordable housing) have been tested and are viable.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Increase housing requirement to ensure affordable need is met in full, for instance, deliver more housing with a lower affordable housing percentage to then deliver a greater quantum of affordable housing.</p> <p>3. Affordable housing target not achievable based on past delivery.</p> <p>4. Affordable housing and tenure mix may not be achievable on large sites which the</p>	<p>2. Across the plan period, we expect the sites in the JLP to deliver around 5,600 affordable homes in each district. This is a snapshot of supply between 1 April 2021 and 31 March 2041, based on the trajectories we submitted with the plan, and may change over time. The supply comes from a combination of affordable homes delivered to date, sites with planning permission (and the associated number of affordable homes in the section 106 agreement), neighbourhood development plan allocations, and JLP allocations. Figures 88 and 90 of the Joint Housing Needs Assessment (examination library reference HES15.1) identify a minimum affordable housing need of 2,899 and 3,953 homes in South Oxfordshire and Vale of White Horse respectively. The plan therefore exceeds the minimum affordable housing need in each district. To meet our plan objectives, we are seeking to do more than the minimum by addressing those in less acute categories of affordable housing need as well.</p> <p>3. Policy HOU3 provides a sound and proportionate target for delivering affordable housing. The delivery or granting of permission for affordable housing as a proportion of major development may be lower than the target rate set through the development plan, and will vary year by year depending on the types of schemes coming forward and their phasing. Part 8 of the policy allows for flexibility, recognising that there will be cases where site-specific characteristics and constraints indicate it is not viable to achieve the percentages in policy HOU3, or where an off-site financial contribution is appropriate. This does not mean the target is unachievable or should be changed. If lower targets are achieved on these sites, there is headroom in the overall supply of affordable housing to meet the minimum needs identified in the Joint Housing Needs Assessment (JHNA) (see our response above).</p> <p>4. Joint Local Plan Viability Report and Appendices (examination library references ITV04 and ITV04.1) appraised a range of site sizes and</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>plan relies on due to abnormal infrastructure costs.</p> <p>5. The policy does not sufficiently account for variation in viability across different locations and development types.</p> <p>6. Alternative approaches / quantum of affordable housing proposed.</p>	<p>typologies including large scale major development and the large residential led allocations in the plan and concluded they are deliverable. Part 8 of Policy HOU3 allows for flexibility in the quantum and mix of affordable housing tenures where justified.</p> <p>5. Please see Joint Local Plan Viability Report and Appendices (examination library references ITV04 and ITV04.1). The proposed affordable housing levels and mix are evidenced through a detailed assessment of viability across the district for different sizes and types of development on both greenfield and brownfield land, and demonstrate the requirements remain viable.</p> <p>6. The JHNA (examination library reference HES15.1) provides a robust and justified evidence base for identifying the affordable housing needs of the plan area carried out in accordance with national policy and guidance. The Housing Requirement, Affordable Housing and Gypsies, Travellers and Travelling Showpeople Topic Paper (examination library reference TOP03.2) identifies and justifies our approach to addressing these needs.</p>
Policy HOU4: Housing mix and size	<p>1. Respondents raised concerns that the policy's bedroom mix requirements are overly prescriptive, citing:</p> <p>a. schemes would be unable to respond to local context, changing needs through the plan period, and market forces.</p>	<p>1. Regarding the policy's bedroom mix requirements:</p> <p>a. In order to create a clear and effective policy, we have set a specific requirement for bedroom mix within the policy based on current evidence. We consider this to be a robust assessment of the housing mix needs as of 2024/25 but acknowledge that household formation and size is likely to change over time and will be influenced by many factors outside the control of the JLP. The Joint Housing Needs Assessment (JHNA) (examination library reference HES15.1) can only provide a snapshot in time of housing needs. As Section 38(6) of the</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. a threshold should be introduced as smaller sites will be unable to meet the percentages.</p> <p>c. concerns with the evidence supporting this requirement.</p> <p>2. Respondents raised concerns regarding the provision of M4(3) dwellings, citing:</p> <p>a. the evidence to support the policy is unclear, particularly regarding the different requirements for each district.</p> <p>b. M4(3) dwellings may negatively impact viability and land take.</p>	<p>Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise, there is sufficient flexibility in the decision making process should local needs significantly changed throughout the plan period, or if the mix becomes inappropriate for some other reason (such as changes in national policies or guidance).</p> <p>b. In our current adopted local plans, our housing mix policies apply to all new developments, and the JLP continues this approach. Smaller sites make an important contribution towards addressing the needs of the district, delivering an estimated 3,033 homes in South Oxfordshire and 1,932 homes in the Vale of White Horse (see Site Selection Topic Paper, examination library reference TOP07, Paragraph 3.9). If this is inappropriate for a specific reason, it will be determined through the application process.</p> <p>c. The Joint Housing Needs Assessment (JHNA) (examination library reference HES15.1 section 5, particularly figures 90 and 91) provides robust evidence to justify this policy.</p> <p>2. Regarding the policy's requirements for the provision of M4(3) dwellings:</p> <p>a. The JHNA provides robust evidence to justify this policy.</p> <p>b. All policies in the Joint Local Plan were tested through the Viability Report (examination library reference ITV04), which found that the policies as written are viable to implement in the districts.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. Some respondents raised concerns that requirement for all homes to be delivered to M4(2) standards may cause viability issues.</p>	<p>3. All policies in the Joint Local Plan were tested through the Viability Report, which found that the policies as written are viable to implement in the districts.</p>
<p>Policy HOU5: Housing for older people</p>	<p>1. Respondents expressed concerns that the policy does not make appropriate provision for the identified need for specialist housing for older people, citing:</p> <ul style="list-style-type: none"> a. the policy only allocates for housing with care, not housing with support. b. it is unlikely the need for specialist housing will be fully met by the allocations or windfall sites. c. the policy does not make any provision for care homes. <p>2. Respondents suggested the policy should make allocations of smaller and/or self-contained sites to improve delivery.</p> <p>3. Respondents expressed concerns about the requirement for housing with care on allocated sites in the Joint Local Plan, suggesting:</p> <ul style="list-style-type: none"> a. the requirement has been added too late in the plan-making process. 	<p>1. (a-c) Policy HOU5 provides our strategy for addressing the needs of older people, as identified in the Joint Housing Needs Assessment (JHNA) (examination library reference HES15.1). We consider this strategy provides a sufficient supply of housing for older people to address the identified need and is consistent with Paragraph 63 of the NPPF.</p> <p>2. We consider the policy approach provides a sufficient supply of housing for older people to address the identified need. Furthermore, the Spatial strategy (Policy SP1) and Settlement hierarchy (Policy SP2), in combination with criteria 5a)-e) of Policy HOU5 provide a supportive framework for speculative applications for such uses.</p> <p>3. Regarding concerns about the requirement for housing with care on allocated sites:</p> <ul style="list-style-type: none"> a. The plan has been appropriately consulted upon. We indicated that there would be a requirement for extra care on allocated sites during our Preferred Options Consultation (examination library

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. it is unclear if housing with care is additional to the quantum of homes in the allocation policies.</p> <p>c. there is no trajectory for the delivery so will be no supply in the short term.</p> <p>4. Some respondents raised concerns that the requirement for all housing with care to be delivered to M4(3) standards would have viability issues that were not appropriately considered in the Viability Report.</p>	<p>reference LPP01.1, Policy HOU5).</p> <p>b. We consider that it is clear that the housing with care requirement is additional to the quantum of homes on the proposed allocations as set out in the policies in Chapter 8.</p> <p>c. We have established the need for specialist housing for older people in the context of our overall housing need. Neither the NPPF, nor the PPG, require plans to provide a separate trajectory for specialist housing delivery. We consider the policy approach provides a sufficient supply of housing for older people to address the identified need.</p> <p>4. All policies in the Joint Local Plan were tested through the Viability Report (examination library reference ITV04), which found that the policies as written are viable to implement in the districts.</p>
Policy HOU6: Self-build and custom-build housing	<p>1. Do not support the requirement on large scale major developments as it undermines deliverability and incompatible with single plots by individuals.</p> <p>2. The plan should identify specific sites where self-build can be delivered to align with the preference of self-builders.</p> <p>3. The 5% requirement for plots on large scale major developments is not justified</p>	<p>1. It is common for local authorities to secure self and custom build plots as part of large scale major developments, and this approach is directly supported by the PPG (Paragraph: 025 Reference ID: 57-025-20210508).</p> <p>2. The PPG confirms there is no duty on a relevant authority to grant planning permission to specifically meet the requirements expressed by those on the register (Paragraph: 028 Reference ID: 57-028-20210508).</p> <p>3. The 5% requirement provides an opportunity for the market for this form of housing to develop and grow. Parts 5 and 6 of Policy HOU6 allow the</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>by evidence of need or demand.</p> <p>4. The reliance on large scale developments to meet demand is contrary to national policy (NPPF 2023 para 70).</p>	<p>councils to be flexible in allowing developers to return these plots to 'standard stock' in the event there is insufficient demand.</p> <p>4. Policy HOU6 and the JLP Policy SP1 (Spatial strategy) and Policy SP2 (Settlement hierarchy), are in accordance with NPPF paragraph 70, as it provides opportunities for small sites to come forward in sustainable locations. Furthermore, as we have set out in the Site Selection Topic Paper (examination library reference TOP07, Paragraph 3.9), that we expect at least 10% of our housing supply to come forward on sites of 1ha or less in accordance with Paragraph 70a of the NPPF.</p>
Policy HOU7: Affordable self and custom-build housing	No key issues raised.	N/A
Policy HOU8: Replacement dwellings in the countryside	1. Respondents raised concerns that the policy exceeds national requirements and is overly prescriptive.	1. The policy helps guide the process of replacing dwellings to ensure that where dwellings are demolished and replaced, this is done in a way that is appropriate to its surroundings, which is particularly important in rural districts such as South Oxfordshire and Vale of White Horse. There is sufficient flexibility to consider site-specific circumstances in the application of the policy.
Policy HOU9: Sub-division of houses	1. Historic England suggested the policy should reference the significance of heritage assets.	1. The Joint Local Plan should be read as a whole. Policies NH8 – NH13, which relate to protecting and enhancing the significance of heritage assets, would also apply in instances of sub-division. We don't believe it would be effective to replicate elements of those policies here.
Policy HOU10: Meeting the	1. Not supported by up-to-date evidence on the need for pitches.	1. The GTAA 2024 (examination library reference LPA01) has been published and identifies the need for pitches for travellers and plots for

Policy	Key issues raised	Councils' response to key issues raised
needs of Gypsies, Travellers and Travelling Showpeople	2. Provision of pitches will impact the ability of strategic housing allocations to make efficient use of the land allocated.	travelling showpeople in both districts. 2. Our Topic Paper on Housing Requirement, Affordable Housing and Gypsies, Travellers and Travelling Showpeople (examination library reference TOP03.2) at paragraphs 4.49 to 4.52 justifies our approach to seeking provision of pitches on the strategic housing allocation sites. This will harness the opportunity to deliver pitches in sustainable locations, and provide a settled base where households can access appropriate health services and ensure that children can attend school either within the allocation or the settlement they adjoin. It involves integrating a small number of 6 to 10 pitches into the design of each development from the start. Para 4.53 sets out why we don't think this requirement is too onerous, given that only a small proportion of the site would be required for pitch provision.
Policy HOU11: Safeguarding existing Gypsy, Traveller and Travelling Showpeople's sites	No key issues raised.	N/A
Policy HOU12: Rural and First Homes exception sites	No key issues raised.	N/A

Policy	Key issues raised	Councils' response to key issues raised
Policy HOU13: Community-led housing development	1. The plan should not restrict sites in terms of overall development numbers as it is contrary to proposed changes in the emerging NPPF.	1. Policy HOU13 is consistent with the NPPF regarding community-led development exception sites, specifically paragraphs 73 a) and b) and footnote 37 which limit the size of schemes to no larger than one hectare in size or exceed 5% of the size of the existing settlement.
Policy HOU14: Build to Rent proposals	No key issues raised.	N/A
Policy HOU15: Houses in Multiple Occupation	1. One respondent raised concern that there are not enough HMOs within the districts to justify such a restrictive policy.	1. While we may have a relatively small total number of HMOs in the districts compared with a more urban authority, there are particular 'hot spots' of HMOs, concentrated in urban areas of the districts, such as those adjoining Oxford, Abingdon-on-Thames and Didcot. Policy HOU15 seeks to minimise the potential negative impacts caused by large HMOs.
Policy HOU16: Residential extensions and annexes	No key issues raised.	N/A
Policy HOU17: Rural workers' dwellings	No key issues raised.	N/A

Chapter 7: Jobs and tourism

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 7</p>	<ol style="list-style-type: none"> 1. Oxford City Council raised Duty to Cooperate concerns regarding engagement on strategic employment matters, and also challenged the methodology of the JLP employment evidence base: the Employment Land Needs Assessment (ELNA). 2. There is too much emphasis on developing employment land within Science Vale which needs to be balanced with meeting the needs of the wider, and more local economy, and the foundation economy which underpins the global successes in Oxfordshire. 3. Policies JT1, JT5 and supporting text paragraph 7.38 are contrary to paragraphs 88 & 89 of the NPPF (2023) in that they seek to limit both the location and type of employment development that would be 	<ol style="list-style-type: none"> 1. We have consistently engaged with Oxford City Council on all of the overall strategic matters including employment, as evidenced in the Duty to Cooperate Statement of Compliance (examination library reference CSD09.1). We met with Oxford City Council on 28 November 2024 to discuss their concerns about the ELNA methodology and specifically to understand how these impacted on Oxford. We have reviewed Oxford's concerns with our ELNA consultants and concluded that no changes to the ELNA are required. Please refer to Main Issue 1 – Duty to Cooperate, Main Issue 5 – Economic Growth (examination library reference LPA11), our Response to the Inspectors' Initial Questions (IQ24 and IQ25 in examination library reference LPA02) and our Written Statements on Duty to Cooperate and Employment Land Requirement (examination library references WS2/1 and WS4/1) for further details in response to this issue. 2. Policy JT3 (Affordable workspace) specifically supports proposals for genuinely affordable workspaces, incubators, accelerators or co-working spaces to assist the foundational economy or other community, creative and arts sectors. We have justified our policy through the Employment Land Needs Assessment Phase 2 (examination library reference HES08.1) which defines the foundational economy in South and Vale, reviews the relative affordability of locations across the districts, sets out a review of affordable workspace policy from other local authorities and recommends an approach for the JLP. 3. Policies JT1, JT5 and supporting text paragraph 7.38 are in conformity with NPPF paragraphs 88 and 89 by supporting a prosperous rural economy in the countryside. Please refer to Main Issue 5 – Economic Growth (examination library reference LPA11) for further details in response to this issue.

Policy	Key issues raised	Councils' response to key issues raised
	<p>acceptable in rural areas, outside existing settlements, without providing any evidenced justification for this departure from national policy.</p> <p>4. There is a lack of a sector analysis, or new employment sites, which has the effect of underplaying the importance of the Science, Innovation and Technology sector. The JLP does not take account of market signals, barriers to investment, needs of different sectors, and the importance of major employment sites to the national economy.</p>	<p>4. The JLP recognises the importance of the science, innovation and technology sector, and emphasises the regionally, nationally and globally important employment areas located within Science Vale including Culham Campus, Milton Park and Harwell Campus. The JLP is underpinned by the ELNA (Employment Land Needs Assessment) - a robust, comprehensive and balanced assessment of the employment land needs in the districts. It provides insight into Oxfordshire-wide considerations such as emerging floorspace needs and other market signals. The ELNA recognises various challenges and opportunities highlighted in the OxLEP Local Industrial Strategy 2019 (examination library reference HES05). It also recognises the Strategy's ambition to oversee the necessary 'transformation of science and technology parks and creation of new hubs'. So, in providing policy context, as well as an extensive property market profile, an employment land availability assessment and a robust needs assessment, the ELNA provides an appropriately detailed analysis of current relevant market drivers, signals, and the determinants surrounding needs for different property types. Please refer to our response to the Inspectors' Initial Questions (examination library reference LPA02, question IQ25) for further details in response to this issue.</p>
Policy JT1: Meeting employment needs	<p>1. Concern the need for employment land is underestimated, particularly within the context of evidence from other organisations that proposes a greater need (e.g., Oxfordshire Local Enterprise Partnership's Strategic Economic Plan,</p>	<p>1. The Employment Land Needs Assessment (ELNA) (examination library reference HES08) is a robust, comprehensive and balanced assessment of the employment land needs in the districts, which provides an accurate assessment of the level of employment need. We have responded to the employment need concerns in our response to Main Issue 5 – Economic Growth (examination library reference LPA11) and our Written Statement</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>Cherwell District and Oxford City Councils' Housing and Economic Needs Assessment and Advanced Oxford's Oxford Innovation Engine).</p> <p>2. The strategy to address the need is not correct, citing:</p> <p>a. there are not enough sites proposed, with an overreliance on windfall.</p>	<p>on the Employment Land Requirement (examination library reference WS4/1) with further details in response to this issue.</p> <p>2. Our strategy to address employment need is sound because it is justified (as set out in Section 4 of the Employment Needs Topic Paper, examination library reference TOP02.2) and consistent with national policy:</p> <p>a. There are 13 sites forming our employment land supply proposals, at a range of sizes from 0.7ha to 93ha and they are located at different types of locations. The range of sizes and types of our employment land supply and windfall commitments which come forward allows for choice in the market, helping to ensure that businesses across a variety of sectors, at differing sizes and with diverse needs, can find an appropriate new sites or redevelopment opportunities within the districts. Many of these sites were allocated in our previous local plans to deliver employment land and have capacity remaining, they are therefore well positioned to deliver over the plan period and potentially beyond it. This employment supply is bolstered by sites allocated in neighbourhood plans across the districts.</p> <p>Furthermore, monitoring data up until end of March 2023 indicates that there is 74ha of employment land with planning permission that hasn't been built yet which forms our pipeline supply (this figure will be updated as new monitoring data becomes available). This is in addition to sites with Enterprise Zone status at the land next to Milton Interchange and Didcot Quarter, which confers streamlined planning processes, or a Local Development Order (either adopted or in progress) at Didcot Technology Park and Milton Park, designed to</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. development is too focussed in particular locations, e.g., Science Vale.</p>	<p>allow development within the employment use classes. These sites are well positioned to deliver over the plan period.</p> <p>Our approach is informed by Recommendation 1 of our employment evidence, the Employment Land Needs Assessment (ELNA, examination library reference HES08) which states 'meeting the additional need for employment land should be achieved through land already allocated for development within local plan policy which is yet to come forward, vacant land within existing clusters and approved applications in the planning pipeline.' When all sources of supply are taken into account, the total employment land requirements identified in the ELNA are exceeded. This is the desired scenario because it allows scope for churn, choice and flexibility in the local employment market. Therefore, there is no justification for the concern that there is an over-reliance on windfall sites.</p> <p>b. The spatial strategy generally focusses development at Science Vale, and this is both justified and consistent with national policy. Our spatial strategy takes account of the Oxfordshire Strategic Vision to 2050 (examination library reference GRO06), which is a long-term vision for long-term sustainable development, prepared by all the councils in Oxfordshire working together through the Future Oxfordshire Partnership. As such, development is directed towards the more sustainable settlements with close links between housing, jobs and services. Science Vale is one such area, and so we will continue to deliver development there, through housing at the sites allocated in the plan and sustainable economic development at Culham Campus, Harwell Campus and Milton Park.</p> <p>The National Planning Policy Framework (NPPF) encourages local planning authorities to guide development towards sustainable</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>locations, taking account of local circumstances to reflect the character, needs, and opportunities of different areas (paragraph 9). Science Vale is a prime example of such a location, where sustained economic growth has been actively supported through a combination of government initiatives and strategic policies. These include Enterprise Zones, Local Growth Funding, and the production of Local Development Orders (LDOs), alongside overarching frameworks such as the Oxfordshire Local Industrial Strategy (examination library reference HES05) and the Strategic Economic Plan for Oxfordshire 2016 (examination library reference HES06). To sustain this economic momentum, it is essential that housing is located close to Science Vale, ensuring that a local workforce is available to support and enhance economic development in the area. The spatial strategy reflects the objectives of paragraph 11a of the NPPF by promoting a development pattern that responds positively to local needs while aligning growth with infrastructure provision, enhancing the environment, and addressing climate change. This approach makes efficient use of land, particularly in urban areas, and supports the adaptation needed to mitigate the effects of climate change. Directing growth away from Science Vale would not only limit the area's potential to meet these objectives but would also undermine the long-term sustainability of the local economy and infrastructure. Alternative approaches to growth distribution, diverging from the carefully considered spatial strategy, would fail to achieve the balanced and sustainable pattern of development that is required to meet the district's needs effectively.</p> <p>Employment land development is not restricted to Science Vale, however. Policy JT1 would secure employment development at existing employment sites and on brownfield sites within the built-up area of Tier 1-4 settlements. Policy JT5 makes further provision</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. it constrains growth by an under-delivery based on evidence of historic supply.</p>	<p>through policy measures that support the sustainable growth of existing businesses and the creation of new sustainable land-based and agricultural businesses in the countryside (i.e. outside of Science Vale and the Tier 1-4 settlements). Similarly, Policy JT6 allows for appropriate development outside existing settlements where it supports sustainable tourism and the visitor economy. Therefore, it isn't justified to conclude that development is too focused in Science Vale.</p> <p>c. The ELNA does not provide evidence based solely on historic supply, rather it considered a range of potential growth scenarios. This included a labour demand scenario based on Oxford Economics projections, a past take-up scenario which considers past net absorption of employment floorspace and a labour supply scenario derived from labour demand accounting for population growth. The ELNA recommended taking a hybrid approach using the demand/past take-up scenario, this informed the preferred approach of the plan. By providing policy context, as well as an extensive property market profile, an employment land availability assessment and a robust needs assessment, the ELNA provides an appropriately detailed analysis of current relevant market drivers, signals, and the determinants surrounding needs for different property types. While concerns have been raised that the ELNA underestimates need – an assertion which we contest – even if this position were accepted, when all sources of supply in the Joint Local Plan are taken into account, the total employment land supply exceeds the requirements set out by the ELNA. The plan continues to support the increased productivity and growth of all sectors through supporting business formation, growth and relocation as well as supporting the delivery of infrastructure necessary for this to occur.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>d. it is not aligned with Chapter 6 of the NPPF (2023) with respect to support for strong and competitive economies.</p> <p>e. it does not clearly set out how it meets the future needs of the economy in accordance with the emerging NPPF.</p> <p>3. Other sites were promoted.</p>	<p>d. Our districts have strong local economies and are home to some regionally, nationally and globally important employment areas including Culham Campus, Harwell Campus and Milton Park. These strategic employment hubs are critical drivers of the region's knowledge-based economy, contributing to advancements in science, technology and research. Providing ongoing support for development at these employment areas is therefore essential to fostering innovation and driving economic growth. Policy JT1, alongside policies AS11 (Culham Campus) and AS12 (Harwell Campus), provide support for significant development at these sites, enabling them to continue to thrive throughout the plan period and beyond. This approach is consistent with paragraphs 85, 86 and 87 of the NPPF, because it ensures flexibility to adapt to changing economic circumstances, while supporting the long-term growth and resilience of the local and national economy.</p> <p>e. The Employment Needs Topic Paper (examination library reference TOP02.2) sets out that the employment policies in the JLP provide flexibility and resilience to support current and future economic needs. Policy JT1 ensures a diverse range of employment sites of varying sizes and types, catering to businesses across sectors and supporting the foundational economy. By planning for an employment land supply that exceeds the objectively identified need, this policy enables flexibility and churn to accommodate future growth. It also allows for employment development at existing employment sites and on brownfield sites within Tier 1-4 settlements, further enhancing adaptability.</p> <p>3. Sites were promoted through responses to the Regulation 19 publication period. The ELNA has evidenced that our employment requirements can be met through our existing allocations that have not yet been delivered</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>and there is no evidence to justify allocations of new employment sites given the high supply and variety of sites available. The Site Selection Topic Paper (examination library reference TOP07) reviews the process through which the sites for the JLP have been selected, assessed and tested. The sites we have selected for allocation meet our employment needs in full and provide a surplus supply for both in each district.</p> <p>Nonetheless, Policy JT1 is sufficiently flexible to allow many of the site promotions received to come forward if they are located where the spatial strategy supports that development or where they are redevelopments of employment sites.</p>
Policy JT2: Protecting our employment sites	<p>1. Policy is too restrictive and may constrain sustainable development where retention of sites is no longer necessary. This is contrary to the NPPF (2023) (particularly Chapter 11) regarding making effective use of land.</p>	<p>1. Policy JT2 is consistent with national policy at Chapter 11 of the NPPF. The change of use to non-employment uses has stringent criteria within the policy. This is necessary to safeguard our employment sites. The E(g) i-iii, B2 and B8 Use Classes (which our employment sites fall within) is a flexible and wide-ranging definition, so sustainable sites can be redeveloped for a range of new employment uses. There is, therefore, sufficient flexibility to allow businesses to expand and adapt, whilst protecting our employment sites for that purpose. This is important to make sure that there is enough employment land to enable sustainable growth of the local economy and provide for the number of jobs needed over the plan period, and to encourage a sustainable co-location of employment and housing within our most sustainable settlements. This is consistent with the principle of making effective use of land covered in Chapter 11 of the NPPF. Paragraph 123 sets out the requirement:</p> <p>'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. It is unnecessary to require marketing if a site is already demonstrated to be unviable.</p>	<p>accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'</p> <p>Policy JT2 (alongside Policy JT1 (Meeting employment needs)) addresses this directly by setting out a clear strategy for accommodating our objectively assessed employment needs, in a way that makes as much use as possible of previously developed land across the districts in our most sustainable settlements. This approach aligns with Recommendation 2 of our Employment Land Needs Assessment (ELNA, examination library reference HES08) which states that 'in order to meet needs, the Councils should safeguard/resist redevelopment of existing in-use employment land across South Oxfordshire and VOWH.'</p> <p>2. Robust and justified viability and marketing criteria feature as an advisory note in Appendix 6 to the plan. It is necessary to include both marketing and viability requirements for redevelopment to non-employment uses because there may be circumstances where there is market interest for new employment uses, even when the current employment use has been demonstrated to be unviable. This is especially important in areas such as ours with a strong knowledge economy where science and technology advancements can lead to innovative new businesses, with the effect of increasing the viability of existing employment sites.</p>
<p>Policy JT3: Affordable workspace</p>	<p>1. Concerns raised about the viability and feasibility of delivering affordable workspace.</p>	<p>1. The Employment Land Needs Assessment Phase 2 (ELNA2, examination library reference HES08.1) provides an in-depth review of the approach to affordable workspace provision used to inform Policy JT3. The report defines the foundational economy in South and Vale, examines the relative affordability of locations across the districts and reviews affordable workspace policy with some case studies. The ELNA2 provides a series of recommendations, including the need for flexibility, an appropriate level of discount to the market rental rate, an appropriate operational model, and</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>an approach which reflects the local context. In light of this, Policy JT3 is flexible and targeted to make sure that a 'one-size-fits all' approach does not stifle development coming forward or make schemes unviable. Further details about the provision, function, and the management of these new affordable workspaces will be provided in a forthcoming Affordable Workspace strategy.</p> <p>The Joint Local Plan Viability Report Appendices (examination library reference ITV04.1) assessed the viability of Policy JT3. The report notes that JT3 encourages delivery of affordable workspace but does not make this a requirement and, therefore, anticipates that this will only be delivered where viable.</p>
Policy JT4: Community Employment Plans	No key issues raised.	N/A
Policy JT5: Supporting the rural economy	<ol style="list-style-type: none"> 1. Concern that the policy is aimed at controlling and suppressing opportunities, with little proactive or positive text about how and where rural enterprise might flourish. 2. Policy is contrary to the NPPF (2023) (paras 88 and 89) regarding supporting 	<ol style="list-style-type: none"> 1. Our districts are home to many land-based rural businesses, including those producing local food and wood products, as well as equestrian-related businesses. <p>This policy supports the sustainable growth of existing businesses (including the diversification of agricultural or other land-based rural businesses), and the creation of new sustainable land-based or agricultural businesses in the countryside. The policy provides positive measures to ensure rural enterprises can flourish in an environmentally and socially sustainable way, enabling development opportunities that are in keeping with the character of the locality.</p> <ol style="list-style-type: none"> 2. Policy JT5 makes provision to support rural economy businesses in the countryside and therefore meets the requirements of paragraphs 88 and

Policy	Key issues raised	Councils' response to key issues raised
	the rural economy.	89 of the NPPF. Please refer to Main Issue 5 – Economic Growth (examination library reference LPA11) for further details in response to this issue.
Policy JT6: Supporting sustainable tourism and the visitor economy	1. Policy requirements are too onerous and may prevent development coming forward in some locations that may otherwise be appropriate (for instance, locations outside settlement boundaries).	<p>1. The focus of this policy is on supporting sustainable development of the local visitor economy; therefore, an appropriate balance needs to be struck between promoting economic growth and protecting the built and natural environments in South and Vale.</p> <p>Part 2 of the policy does not prevent development. It is important to have the caveats under (2) in place to ensure that, in locations outside existing settlements, new visitor attractions or the upgrading/enhancement of existing attractions are of a scale, type and appearance appropriate to the locality, so that any environmental or community impacts can be kept to a minimum. This approach is consistent with national policy in the NPPF at paragraph 88 which states 'Planning policies and decisions should enable... c) sustainable rural tourism and leisure developments which respect the character of the countryside.'</p> <p>The need for tourism and visitor economy related development to respect the character of the countryside is what the policy is aiming for.</p>
Policy JT7: Overnight visitor accommodation	No key issues raised.	N/A

Chapter 8: Site allocations and Garden Villages

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 8</p>	<p>1. There were a number of comments raised in this chapter regarding:</p> <ul style="list-style-type: none"> a. concerns about deliverability of Biodiversity Net Gain (BNG) on all site allocations. b. concerns about the new addition of Gypsy and Traveller pitches and extra care requirements in the Regulation 19 plan, which respondents felt weren't appropriately evidenced or communicated in advance of publication. c. Oxford City Council stated that the additional requirements for specialist housing types on strategic sites reduced their capacity to meet Oxford's unmet need, also leading to 	<p>1.</p> <ul style="list-style-type: none"> a. We are already implementing the statutory BNG process (i.e. the national requirement to provide 10% BNG) that came into force for major developments on 12 February 2024 and for smaller developments on 2 April 2024. Our Joint Local Plan Viability Report (examination library references ITV04 and ITV04.1) demonstrates that it is viable to deliver a requirement of at least 20% BNG. As a requirement for at least 20% BNG is viable in our districts, there should not be a negative impact on development delivery. The viability testing applied appropriate, locally specific, evidenced costs as set out in our response to the Inspectors' Initial Questions (examination library reference LPA02) at IQ65. This included testing strategic sites and a wide range of different development typologies. b. We have explained how our plan is supported by evidence of need for Gypsy and Traveller pitches in our response to the Main Issue 6 (examination library reference LPA11) and in responding to the key issues for Policy HOU10. c. Policy SP1 (Spatial Strategy) makes it clear that all the agreed unmet housing need of Oxford will remain provided for, with the plan allocating sufficient sites near to Oxford to address this need. The additional requirements for specialist housing types in some of our site policies are over and above the figures for new homes – therefore there will be no impact on meeting Oxford's agreed unmet housing

Policy	Key issues raised	Councils' response to key issues raised
	<p>concerns about deliverability of these sites.</p> <p>d. developer and site promoter concerns about not allocating any new sites and concerns that no allocations within the Vale would potentially be subject to policy provisions of the Joint Local Plan due to progression of previously allocated sites.</p> <p>e. requests for a breakdown of housing numbers and trajectory for each site across the plan period.</p> <p>Other key issues raised:</p> <p>2. Site selection:</p> <p>a. Concerns regarding evidence justifying that site allocations were deliverable.</p> <p>b. Concerns regarding over reliance on large-scale sites and an omission of small/medium sites, with concern that the role of SME housebuilders was not supported.</p>	<p>need. We consider that all of our sites are developable, with a detailed assessment of housing delivery (sites building out in the next 5 years) in our housing land supply statements (examination library references OCD08.1 and OCD09.1). Furthermore, our HELAA (examination library reference HES21.5) assesses all sites submitted to us for consideration, and hence those in the plan.</p> <p>d. & e. We do not consider the points raised to be soundness issues. The Council's Housing Land Supply Statements demonstrate that we have a sufficient housing supply to meet the housing requirements and provide the detail requested regarding housing numbers and trajectories for each site across the plan period. These can be found via examination library reference OCD08.1 (Housing Land Supply Statement for South Oxfordshire District Council, Joint Local Plan 2041) and examination library reference OCD09.1 (Housing Land Supply Statement for Vale of White Horse District Council, Joint Local Plan 2041).</p> <p>2.</p> <p>a. We consider that our site selection process and the consideration of alternatives is appropriate, as referenced in our response to the Inspector's Initial Questions, IQ46 (examination library reference LPA02, paragraph IQ46.18).</p> <p>b. The councils have submitted housing land supply statements for each district which demonstrate a 5 year land supply for each district; 5.59 years in South Oxfordshire and 7 years in the Vale of White Horse (examination library reference OCD08.1 – South Oxfordshire and OCD9.1 - Vale of White Horse). The latest housing trajectory for the</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. Comments that Chalgrove Airfield should continue to be a site allocation because it is deliverable; and that the former South Oxfordshire District Council offices at Crowmarsh Gifford</p>	<p>plan in the proposed modifications (modification numbers MM06 and MM07, examination library reference CSD01.1) includes a breakdown of our expected housing delivery over the plan period. For South Oxfordshire, there is only one future year where housing delivery falls slightly below the requirement (2031/32), but this is offset by most other years far exceeding this. In the Vale of White Horse, housing delivery is consistently above the requirement until 2039, where supply marginally drops below the requirement. However, again, this is mirrored by years of significant over delivery prior to this. For both councils, the trajectories demonstrate a consistent meeting, or exceeding, of the housing trajectory for the vast majority of the plan period. There are a number of large housing sites in the plan which will deliver in the medium to long term (where they don't already have permission or are building out). There is a significant supply in both districts from both large and small sites in the short term and there are policies in the plan that support the delivery of windfall sites throughout the plan period. The total supply significantly exceeds the total requirement in both districts, by 24% in South and 35% in Vale, which mitigates against the impacts of delivery issues that a large site or sites may experience. The plan provides a 5 year land supply from the intended date of adoption (December 2025) in line with the requirement of NPPF paragraph 69. Beyond this, we are confident that the housing supply in each district will continue to provide the councils with a rolling 5-year housing land supply.</p> <p>c. We assessed Chalgrove Airfield in our Site Selection (Incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). This concludes, on pages 32-33, that Chalgrove Airfield is 'not recommended to be retained in the Joint Local Plan' as, though it is available, it is not suitable or achievable. Further details regarding its assessment are in the Topic Paper.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>should be a site allocation (as in the Regulation 18 version).</p> <p>d. Many additional and/or alternative sites were promoted, including a request for a policy for Milton Park as another strategic employment site.</p>	<p>Therefore, we have not carried forward this allocation from the South Oxfordshire Local Plan 2035.</p> <p>This Topic Paper also addresses the former South Oxfordshire District Council offices, Crowmarsh Gifford. The reason for discounting this site is highlighted on page 78:</p> <p>'The landowner is not certain which use they want to progress on this site at this time. One of the landowner's promoted uses would see a continuation of the established employment use of the site and therefore does not require an allocation to be made at this time. A future allocation could be considered through a future Local Plan or Neighbourhood Plan'.</p> <p>South Oxfordshire and Vale of White Horse's Cabinet reports, published in September 2024 and titled 'Joint Local Plan 2041 – Approval of Publication Version and Next Steps' highlight these reasons for discounting the site and also explain that:</p> <p>'The proposal to allocate the former council office site at Crowmarsh Gifford has not been carried forward into the draft submission version of the plan. There is no identified need to allocate this site for residential or employment uses of any type.'</p> <p>d. Our housing allocations already sufficiently address our requirements, and also provide headroom, should some sites be delayed in coming forward; and our employment supply also exceeds the need.</p> <p>We recognise and are proud that our districts have strong local economies and are home to some regionally, nationally and globally important employment areas, including Milton Park, for life sciences</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>and creative industries. We do not need a separate policy for Milton Park, due to the Milton Park Local Development Order (LDO) covering the site. Our Site Selection (Incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) justifies our approach, in paragraph 2.26, page 10:</p> <p>‘Milton Park is an allocation with 5.36ha capacity remaining. There is a Local Development Order covering the entire site. This enables development to come forward at Milton Park through the Local Development Order process, so it is not necessary to allocate development through the Joint Local Plan at this site. Although it is not being carried forward as an allocated site, the remaining employment capacity at Milton Park has nonetheless been accounted for in the employment land supply set out in policy JT1.’</p> <p>Milton Park’s net amount of employment supply (5.36 hectares) is recognised through Policy JT1 (Meeting employment needs, Table JT1.6).</p> <p>Vale of White Horse District Council recently published a press release, explaining how the council has partnered with MEPC, asset managers for Milton Park, to deliver an updated Milton Park LDO to 2041. This confirms that:</p> <p>‘under the new revised LDO, Milton Park will be able to accommodate up to 4.2 million sq ft of development space and will support the creation of new jobs, drive forward sustainability and simultaneously attract significant investment in the Didcot area’.</p> <p>The Joint Local Plan recognises the contribution Milton Park will make</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. Site Selection Topic Paper:</p> <ul style="list-style-type: none"> a. Concern with the allocated sites' selection and concern that other sites have not been interrogated as potential suitable alternatives or additional allocations. b. Comments that the Topic Paper does not consider the HELAA outcomes. c. Concerns that insufficient justification provided for why sites haven't been allocated. <p>4. Concern that public opinion regarding some sites was not being heard / addressed.</p> <p>5. Thames Water suggested the addition of references to wastewater/water supply network capacity for all site allocations</p>	<p>to meeting our employment need through the LDO.</p> <p>3. (a-c) We consider that our site selection process and the consideration of alternatives is appropriate, as referenced in our response to the Inspector's Initial Questions, IQ46 (examination library reference LPA02, paragraph IQ46.18).</p> <p>We disagree that justification is not provided for why sites have not been allocated and consider our approach justified, the assessment of sites is set out in our Site Selection (Incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1).</p> <p>4. We believe that full, extensive consultations and requests for representations on the Joint Local Plan, including its site allocations, took place at each appropriate Regulation stage, as clearly set out in our Regulation 22 Consultation Statement and Appendices (examination library references CSD10 and CSD10.1). These documents provide full consultation reports summarising the main issues raised throughout our Regulation 18 Issues and Preferred Options consultations and explaining how they were taken into account. We consider the submitted Joint Local Plan to be an appropriate strategy for development in our districts. All allocation sites in the Joint Local Plan are also currently allocated (either in full or in part) in existing local plans, with several sites progressing planning applications.</p> <p>5. We don't believe this suggested change is necessary to ensure the soundness of the plan. The councils believe that Policy IN1 (Infrastructure and service provision) sets an appropriate framework</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>and highlighted the need to liaise with them to determine whether a detailed drainage/water infrastructure strategy is required. They confirmed that upgrades are planned for the sewage treatment works at Abingdon, Culham, Didcot and Oxford. For the edge of Oxford sites allocations, they requested that the council agree a suitable Grampian condition with Thames Water to be imposed on grants of planning permission where necessary, to ensure development is undertaken in tandem with the staged delivery of the upgrade works. They also confirmed investigations of the impact of groundwater on the Oxford sewer network.</p>	<p>for securing infrastructure from new development.</p> <p>The confirmation of upgrade work is noted - and this will be reflected in our forthcoming Water Cycle Study.</p> <p>Regarding Grampian conditions, Policy CE8 – Water Quality, Wastewater Infrastructure and Drainage, criterion 8, clearly highlights that:</p> <p>‘Where wastewater infrastructure capacity constraints are identified, development must not commence until the delivery of sufficient new and/or upgraded wastewater infrastructure has been agreed and programmed (between the developer and Thames Water or other utility provider). Development must not be occupied until the necessary wastewater treatment infrastructure upgrades have been completed. A phased approach may be required to ensure alignment between development and infrastructure delivery. The council will apply Grampian conditions, where appropriate, to ensure that adequate sewerage capacity is in place before new homes are occupied in order to protect water quality’.</p>
<p>Policy LS1: Proposals for Large Scale Major Development</p>	<ol style="list-style-type: none"> 1. Comments stated that Part G of the policy is not required and it would be more appropriate to deal with documents required via the Validation Checklist instead. 2. There was unnecessary duplication with other plan policies. 3. Comments stated that the requirements may not be relevant to all applications and others felt the policy was intended just for 	<p>1 - 3.</p> <p>These comments are noted, however, we consider that the content and scope of the policy, including Part G, is appropriate, providing a clear continuation of our existing policy approach in South and providing consistency with other policies in the Plan. We also consider Policy LS1's approach is appropriate to provide clarity for decision-making purposes - as it clearly expresses policy expectations. Cutting down aspects of the policy would not provide sufficient coverage for speculative applications.</p>

Policy	Key issues raised	Councils' response to key issues raised
	residential developments.	
Policy AS1: Land at Berinsfield Garden Village	<p>1. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including:</p> <ul style="list-style-type: none"> a. requesting clarification over the provision of care home units in addition to the 1,700 allocated. b. concerns about the delivery of pitches for Gypsies and Travellers <p>c. concerns over the deliverability of proving 50% affordable housing on site, especially considering the necessary regeneration package at Berinsfield.</p>	<p>1. We welcome the support for the inclusion of this allocation. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p> <ul style="list-style-type: none"> a. The number of care home units are in addition to the 1,700 homes allocated. b. The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA) executive summary was submitted to the examination in December 2024 (examination library reference HES13) and the full report (examination library reference LPA01) was submitted to the examination in February 2025. The GTAA was carried out in accordance with revised planning definition of 'gypsies and travellers' contained within annex 1 of the Planning Policy for Traveller Sites (PPTS, 2024) and justifies the need for pitches for gypsies and travellers. Our Housing Requirement, Affordable Housing, and Gypsies, Travellers and Travelling Show People Topic Paper (examination library reference TOP03.2) identifies how sufficient provision will be made through the plan to meet the need for pitches and justifies our approach to seeking pitch provision on the housing-led allocations, such as this site. The Berinsfield site allocation is a suitable and sustainable location to meet some of this housing need (6-10 pitches). c. The delivery of affordable housing on the site has been justified through the Viability Report (examination library reference ITV04) and therefore we do not consider it necessary to modify this. Specifically relating to Berinsfield, Policy AS1 recognises that a bespoke approach

Policy	Key issues raised	Councils' response to key issues raised
	<p>d. concerns over the proportional contributions for infrastructure delivery and unknown outcome of the Housing Infrastructure Fund inquiry.</p> <p>e. concerns over the policy reference to the concept plan, claiming that the site promotor's Masterplan Framework Document supersedes this.</p> <p>2. Oxfordshire County Council made a number of comments on the policy, including commenting that the policy needs to refer to the need for a flood risk assessment.</p> <p>3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board request amendments to the supporting text to provide further information on the community hub.</p>	<p>needs to be taken to address existing local need and rebalance the mix of housing tenure across the Garden Village. In addition, the affordable housing policy, HOU3, contains flexibility to allow for a differing mix of affordable housing where it can be demonstrated, through an open book viability assessment, that the level of affordable housing being sought would be unviable.</p> <p>d. The Infrastructure Delivery Plan is supported by evidence and is therefore justified and effective; therefore, no modifications are needed to the policy in relation to infrastructure provision. The outcome of the HIF inquiry is now known: the scheme has been permitted (examination library reference LPA06).</p> <p>e. The concept plan is indicative, and the policy only requires that a comprehensive masterplan takes it into consideration, therefore there is appropriate flexibility in the wording.</p> <p>2. Regarding flood risk, Policies LS1 (Proposals for Large Scale Major Development) and CE6 (Flood Risk) require a site-specific flood risk assessment to be undertaken to support a planning application on this site - therefore no modification is required to this policy.</p> <p>3. The ICB believes that this policy needs to be amended to include specific wording regarding a community hub. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1: Infrastructure and Service Provision sets an appropriate framework for securing infrastructure from new development and details regarding a community hub can be discussed at the planning application stage.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>4. The Environment Agency raised concerns with water quality, flood risk and the evidence base.</p> <p>5. Some respondents raised concerns over the potential diversions of buses from A4074 to the site.</p>	<p>4. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the main issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>5. Policy wording in AS1 addresses the provision of excellent public transport facilities, including specifics relating to the delivery of bus services. Any future bus routes relating to the site will be considered through a planning application at the appropriate time and are not considered a soundness</p>

Policy	Key issues raised	Councils' response to key issues raised
		issue.
Policy AS2: Land adjacent to Culham Campus	<p>1. Flooding and sewage concerns were a key issue for this site allocation:</p> <p>a. Oxfordshire County Council stated that the policy needs to clarify that a flood risk assessment is required which will include detailed flood risk modelling.</p> <p>b. The Environment Agency raised concerns with water quality and the evidence base. They requested strengthening the policy in relation to flood risk and asked for specific wording amendments regarding the River Thames ecological buffer zone.</p>	<p>1.</p> <p>a. This allocation adjacent to Culham Campus is an existing allocation which, like all the AS sites, has been tested and updated where necessary. Please see the Site Selection Topic Paper (Incorporating Sequential Flood Risk and Exception Test) (examination library reference TOP07.1) for further information.</p> <p>Regarding flood risk, Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require the developer to prepare a site-specific flood risk assessment to support a planning application on this site – therefore we are not proposing a modification to this policy.</p> <p>b. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. There was local resident and parish concern that flood risk to existing neighbouring communities will increase.</p> <p>2. Concerns from local residents and parish councils regarding the scale of the allocation. A number of people objected to the overall policy, suggesting the proposals were not required. There were many suggestions to reduce the number of homes to 700-800 due to an excess</p>	<p>Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>We don't believe that the suggested changes to the policy regarding the River Thames ecological buffer zone are necessary, as Policy HP10: Watercourses and its supporting text set out the councils' position on buffer zone requirements for watercourses. Making such a modification would therefore duplicate this.</p> <p>c. Regarding flood risk, Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require the developer to prepare a site-specific flood risk assessment to support a planning application on this site. Policy CE6 specifically states that for sites such as this 'it should be demonstrated that flood risk downstream will not be made worse by development. Measures that contribute to a reduction in flood risk downstream are encouraged.'</p> <p>2. The adopted South Oxfordshire Local Plan 2035 (examination library reference ALP01) allocated land adjacent to Culham Campus for 3,500 homes, 7.3 hectares of employment land in combination with the adjacent campus, and 3 pitches for Gypsies and Travellers. The Planning Inspectorate has already comprehensively considered this allocation through a statutory Local Plan examination process. The council adopted the plan in December 2020, which included the allocation of this site for</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>supply of homes over need and the negative impact on: infrastructure (including transport/traffic/local services) the environment (including air quality), biodiversity, flood risk/sewage and the Green Belt. There were suggestions that a secondary school should be located elsewhere and requests for development of safe walking and cycle routes to Abingdon and beyond.</p> <p>3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board suggested additional wording and rewording of the policy regarding healthcare provision.</p> <p>4. There was a recommendation that Culham Railway Station should become a mobility hub with interchange; however conversely there were concerns that the small station risked becoming a Parkway.</p>	<p>3,500 homes – the same number carried over in the Joint Local Plan's allocation, as well as it being inset from the Green Belt.</p> <p>The NPPF requires us to make optimum use of land and therefore it is appropriate that we are planning for development at this scale on this site, especially given the co-locational benefits of the development, adjacent to an existing employment campus and a railway station.</p> <p>Oxfordshire County Council has confirmed that they are satisfied with school provision in the Joint Local Plan site allocations – and have written a comprehensive Education Topic Paper (2025) (examination library reference LPA12) focusing on the actions needed to meet the education requirements resulting from the housing allocations contained in the submitted Joint Local Plan 2041, including both the expanded / amended housing allocations and sites reallocated in the Joint Local Plan.</p> <p>3. The ICB believes that this policy needs to be amended to include specific wording regarding health care provision and associated infrastructure. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1 (Infrastructure and Service Provision) sets an appropriate framework for securing infrastructure from new development.</p> <p>4. Oxfordshire County Council's strategy is to deliver alternative mobility hubs - locations where people exchange between vehicles and/or between transport modes. Policy SP4's (A Strategy for Abingdon-on-Thames) criterion f v) highlights requirements to improve accessibility around Abingdon-on-Thames by 'creating new pedestrian and cycle links connecting with new development and Radley or Culham railway stations as mobility hubs, particularly where they are identified in the Local Cycling and Walking Infrastructure Plan'.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>5. Concern regarding the Housing Infrastructure Fund 1 scheme overall including points about its delivery, capacity and that the scheme would make carbon reduction targets unachievable.</p> <p>6. Thames Travel stated that a sustainable transport strategy is needed for the A4074, involving comprehensive bus priority measures and effective consolidation, as well as re-modelling of existing car journeys.</p> <p>7. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including suggestions to amend parts of the policy wording; seeking clarification about housing with care requirements; stating the Gypsy and Traveller pitches did not appear justified; suggesting amendments to the concept plan; and raising issues regarding some</p>	<p>Culham Railway Station will act as an interchange, but it is not intended to be a parkway. The site allocation and station will be supported by significant improvements to walking and cycling, allowing access to the station.</p> <p>5. We do not consider the point raised to be a concern, because the Housing Infrastructure Fund 1 (HIF1) outcome is known - planning permission has been granted for the HIF1 scheme and it is fully funded. Further information regarding this can be found in the Secretary of State for Housing, Communities and Local Government's decision on granting planning permission for the HIF1 infrastructure scheme (examination library reference LPA06).</p> <p>6. We have worked closely with Oxfordshire County Council as the highways authority throughout the production of the Joint Local Plan and our transport requirements are underpinned by the Oxfordshire Local Transport and Connectivity Plan (examination library reference LNP10). We consider our transport requirements to be justified and effective, and no modifications are required to this policy. Also see our responses to the key issues raised for Policies IN2 and IN3 for further details regarding sustainable transport and transport infrastructure.</p> <p>7. We welcome the support for this policy. However, we do not consider that the points raised in paragraph 9.20 of the site promoter's response constitute soundness issues, therefore no modification is required to the policy. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p> <p>We have submitted evidence on the need for specialist housing for older people (see examination library reference TOP03.2 for details) and Gypsy</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>infrastructure and facility requirements/obligations and the viability/IDP costings.</p>	<p>and Traveller pitches (see examination library reference LPA01). The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA) executive summary was submitted to the examination in December 2024 (examination library reference HES13) and the full report (examination library reference LPA01) was submitted to the examination in February 2025. The GTAA was carried out in accordance with the revised planning definition of 'gypsies and travellers' contained within annex 1 of the Planning Policy for Traveller Sites (PPTS, 2024) and justifies the need for pitches for gypsies and travellers. Our Housing Requirement, Affordable Housing, and Gypsies, Travellers and Travelling Show People Topic Paper (examination library reference TOP03.2) identifies how sufficient provision will be made through the plan to meet the need for pitches and justifies our approach to seeking pitch provision on the housing led allocations, such as this site. The Land adjacent to Culham Campus site allocation is a suitable and sustainable location to meet some of this housing need (6-10 pitches).</p> <p>The site concept plans are labelled as indicative – therefore they are not 'set in stone' and detailed considerations regarding site layout will be agreed through the development management process.</p> <p>We consider that the Infrastructure Delivery Plan (examination library reference CSD05.1) and the infrastructure supporting evidence, including the Viability Report and its appendices (examination library reference ITV04 and examination library reference ITV04.1), are justified and effective and that our policy requirements are therefore suitable.</p>
<p>Policy AS3: Land South of Grenoble</p>	<p>1. The Environment Agency raised concern with capacity at the Oxford Sewage Treatment Works to accommodate development and flagged risks regarding</p>	<p>1. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library</p>

Policy	Key issues raised	Councils' response to key issues raised
Road, Edge of Oxford	<p>any additional flows discharging to this. Amended wording regarding flood risk was suggested.</p> <p>2. Thames Water noted that there are concerns about the capacity of the Oxford Sewage Treatment Works to</p>	<p>references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>It should be noted that on 22 May 2025 the Environment Agency wrote to the councils updating their position on Oxford STW as Thames Water has now committed to a programme of upgrades that will provide sufficient capacity to accommodate planned development without causing a deterioration in water quality.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>2. In respect of the Sewage Treatment Works, please see point 1 above. Given the importance of ensuring the Oxford Sewage Treatment Works is upgraded to accommodate planned development within the area, we agree</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>accommodate future growth, but that there are plans to upgrade the SWT. They requested that land within their ownership within the boundary is removed from the allocation so the critical upgrade can take place.</p> <p>3. Oxford City Council raised concerns about the trajectory for delivery, the capacity to accommodate housing for older people and Gypsy and Traveller pitches, and the lack of policy reference to the potential reopening of the Cowley Branch Line.</p>	<p>the Grenoble Road site allocation should be amended and will propose a modification to Policy AS3 to reflect the need for expansion of the STW including updating the concept plan and amendments to the policies map.</p> <p>3. The Joint Local Plan does not identify a trajectory for the delivery of agreed unmet need for Oxford City, as neither the NPPF nor the PPG require local authorities to identify agreed unmet need separately from their overall housing requirement. Similarly the plans do not ringfence specific housing sites for addressing unmet need, although we have signed memoranda of understanding regarding the operation for addressing the affordable housing element of Oxford City's unmet housing need, for reasons set out in our response to IQ59 (examination library reference LPA02, see also the memoranda at HES19 and HES20). Therefore, the additional requirement to accommodate housing for older people and Gypsy and Traveller pitches on this site has no bearing on delivering agreed unmet need.</p> <p>Finally, regarding Cowley Branch Line, the Infrastructure Delivery Plan (examination library reference CSD05.1) includes entries for the site schedules for 'any additional sustainable transport upgrades / enhancements (including for public transport, walking and cycling) required to bring forward the development'. This approach will allow the council to seek contributions towards Cowley Branch Line, under Policy IN1 – Infrastructure and service provision, if justified when considering a planning application. Our view is that there is currently insufficient justification to require contributions from our allocations, however, should that justification be forthcoming, the approach in the JLP allows for contributions to be directed to the Cowley Branch Line. Therefore, we do</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>4. Oxfordshire County Council raised concerns about the lack of policy reference to the potential reopening of the Cowley Branch Line. They also suggested the policy should be amended to be clear a flood risk assessment would be required. They suggested the deletion of duplication between Parts 2) i) v) and 2) i) vii) of the policy.</p> <p>5. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>6. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including:</p> <p>a. the requirement for Gypsy and Traveller pitches on site is not justified by evidence and should be removed</p>	<p>not consider this a soundness matter that requires a modification to the plan, as the plan is effective.</p> <p>4. Please see our response to Point 3 regarding the Cowley Branch Line. We note Oxfordshire County Council's detailed comments in terms of flood risk. Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require a site-specific flood risk assessment to be undertaken to support a planning application on this site - therefore no modification is required to address this point. With regard to the duplication, we agree that this needs to be changed and we have suggested a modification to the policy to delete the duplication (modification number AM17, examination library reference CSD01.1).</p> <p>5. The Integrated Care Board (ICB) believes that this policy needs to be amended to include a specific criterion regarding primary health care provision. We don't believe this change is necessary to ensure the soundness of the plan, as Policy IN1: Infrastructure and service provision sets an appropriate framework for securing infrastructure from new development.</p> <p>6. We welcome the support for this policy. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p> <p>a. The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA) executive summary was submitted to the examination in December 2024 (examination library reference HES13) and the full report (examination library reference LPA01) was submitted to the examination in February 2025. The GTAA was carried out in accordance with the revised planning definition of 'gypsies and travellers' contained within annex 1 of the</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. the policy should reference land identified for the upgrade and future expansion to Oxford Sewage Treatment Works</p> <p>c. duplication between Parts 2) i) v) and 2) i) vii) of the policy should be deleted.</p>	<p>Planning Policy for Traveller Sites (PPTS, 2024) and justifies the need for pitches for gypsies and travellers. Our Housing Requirement, Affordable Housing, and Gypsies, Travellers and Travelling Show People Topic Paper (examination library reference TOP03.2) identifies how sufficient provision will be made through the plan to meet the need for pitches and justifies our approach to seeking pitch provision on the housing led allocations, such as this site. The Land South of Grenoble Road site allocation is a suitable and sustainable location to meet some of this housing need (6-10 pitches).</p> <p>b. Please see our response to Point 2 regarding the future expansion to the Oxford Sewage Treatment Works.</p> <p>c. We have suggested a modification to the policy to delete the duplication (modification number AM17, examination library reference CSD01.1).</p>
<p>Policy AS4: Land at Northfield, Edge of Oxford</p>	<p>1. Thames Travel made detailed comments about connections to the site, particularly suggesting the requirement for bus services to nearby villages would not be appropriate.</p> <p>2. The Environment Agency raised concern with capacity at the Oxford Sewage Treatment Works to accommodate</p>	<p>1. We have worked closely with Oxfordshire County Council as the highways authority throughout the production of the Joint Local Plan and our transport requirements are underpinned by the Oxfordshire Local Transport and Connectivity Plan (examination library reference LNP10). We consider our transport requirements to be justified and effective, and no modifications are required to this policy. Also see our responses to the key issues raised for Policies IN2 and IN3 for further details regarding sustainable transport and transport infrastructure.</p> <p>2. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>development and flagged risks regarding any additional flows discharging to this. Amended wording regarding flood risk was suggested.</p> <p>3. Oxford City Council raised concerns about the trajectory for delivery, the capacity to accommodate housing for older people</p>	<p>references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>It should be noted that on 22 May 2025 the Environment Agency wrote to the councils updating their position on Oxford STW as Thames Water has now committed to a programme of upgrades that will provide sufficient capacity to accommodate planned development without causing a deterioration in water quality.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>3. The Joint Local Plan does not identify a trajectory for the delivery of agreed unmet need for Oxford City, as neither the NPPF nor the PPG require local authorities to identify agreed unmet need separately from</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>and Gypsy and Traveller pitches, and the lack of policy reference to the potential reopening of the Cowley Branch Line.</p> <p>4. Oxfordshire County Council raised concerns about the lack of policy reference to the potential reopening of the Cowley Branch Line. They also suggested the policy should be amended to state a flood risk assessment would be required.</p>	<p>their overall housing requirement. Similarly the plans do not ringfence specific housing sites for addressing unmet need, although we have signed memoranda of understanding regarding the operation for addressing the affordable housing element of Oxford City's unmet housing need, for reasons set out in our response to IQ59 (examination library reference LPA02, see also the memoranda at HES19 and HES20). Therefore, the additional requirement to accommodate housing for older people and Gypsy and Traveller pitches on this site has no bearing on delivering agreed unmet need.</p> <p>Finally, regarding Cowley Branch Line, the Infrastructure Delivery Plan (examination library reference CSD05.1) includes entries for the site schedules for "any additional sustainable transport upgrades / enhancements (including for public transport, walking and cycling) required to bring forward the development." This approach will allow the council to seek contributions towards Cowley Branch Line, under Policy IN1 – Infrastructure and service provision, if justified when considering a planning application. Our view is that there is currently insufficient justification to require contributions from our allocations, however, should that justification be forthcoming the approach in the JLP allows for contributions to be directed to the Cowley Branch Line. Therefore, we do not consider this a soundness matter that requires a modification to the plan, as the plan is effective.</p> <p>4. Please see our response to Point 3 regarding the Cowley Branch Line. We note Oxfordshire County Council's detailed comments in terms of flood risk. Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require a site-specific flood risk assessment to be undertaken to support a planning application on this site - therefore no modification is required to this policy.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>5. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>6. The site promoter, and Oxfordshire County Council Property Services, supported the inclusion of the policy, however, they raised detailed comments, including:</p> <ul style="list-style-type: none"> a. there should be more flexibility around the phrasing of how many homes the site is expected to deliver. b. the policy should be clearer that BNG does not need to be delivered exclusively on site. c. references to an overall site-wide average net density should be restored. 	<p>5. The ICB believes that this policy needs to be amended to include a specific criterion regarding primary health care provision. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1 (Infrastructure and service provision) sets an appropriate framework for securing infrastructure from new development.</p> <p>6. (a-c) We welcome the support for the inclusion of this allocation. In overall response to the requested changes, we do not consider they are matters of soundness that require a modification to the submitted plan. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p>
<p>Policy AS5: Land at Bayswater Brook, Edge of Oxford</p>	<p>1. Developers and site promoters suggested the site should have a higher development quantum, particularly in line with the resolution to grant planning permission for 1,450 homes.</p>	<p>1. We don't believe the policy needs to change to reflect the resolution to grant planning permission, as the evidence base and mitigation measures are associated with the capacity of 1,100 homes (and other uses on site). The outline consent (when issued following the signing of the Section 106 agreement) will contain appropriate, detailed mitigation measures for the number of homes we consent. Once the Section 106 is signed, and permission is issued, we can review this position and consider whether to remove AS5 and present the current adopted Policy (STRAT13) in Appendix 5 and introduce a new line in Policy HOU2 (Sources of Housing</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Developers and site promoters suggested the allocation should be enlarged by the inclusion of land at various locations surrounding the allocation, including areas that would require Green Belt release. The site promoter suggested expansion would contribute towards a potential housing numbers shortfall. They gave detailed explanations of the positive elements of expanding their site allocation.</p> <p>3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>4. Concerns regarding flooding and/or sewage impact:</p> <p>a. Oxfordshire County Council stated that the policy needs to clarify that a flood risk assessment is required which will include detailed flood risk modelling. More stringent wording was</p>	<p>Supply) as a proposed modification.</p> <p>We are committed to working together with the site promoter to ensure the delivery of the site and we have recently agreed and signed a Statement of Common Ground.</p> <p>2. We note the suggested expansion of Land at Bayswater Brook as a site promotion in Green Belt land. We do not consider it appropriate to release additional Green Belt land currently. Our housing allocations already sufficiently address our requirements, and also provide headroom, should some sites be delayed in coming forward.</p> <p>3. The ICB believes that this policy needs to be amended to include a specific criterion regarding health care mitigation. We don't believe this change is necessary to ensure the soundness of the plan, as Policy IN1: Infrastructure and service provision sets an appropriate framework for securing infrastructure from new development.</p> <p>4. (a-c) South Oxfordshire's Planning Committee resolved to grant outline planning consent (P22/S4618/O) for Land at Bayswater Brook on 11 November 2024. This is subject to: a) the relevant parties signing a Section 106 agreement; and b) planning conditions, which include detailed recommended conditions regarding water, sewage and drainage mitigation.</p> <p>Regarding flood risk, Policies LS1 (Proposals for large scale major</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>also recommended regarding flood risk.</p> <p>b. The Environment Agency raised concern with capacity at the Oxford sewage treatment works to accommodate development and flagged risks regarding any additional flows discharging to this. Amended wording regarding flood risk was suggested.</p> <p>c. general concern from the public re flooding and sewage issues.</p>	<p>development) and CE6 (Flood risk) require the developer to prepare a site-specific flood risk assessment to support a planning application on this site – therefore we are not proposing a modification to this policy.</p> <p>We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>It should be noted that on 22 May 2025 the Environment Agency wrote to the councils updating their position on Oxford STW as Thames Water has now committed to a programme of upgrades that will provide sufficient capacity to accommodate planned development without causing a deterioration in water quality.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>5. Historic England requested that the supporting text refer to the need for a landscape buffer to the listed boundary stone mentioned in the recent Heritage Impact Assessment.</p> <p>6. The developer for Sandhills stated that Sandhills should remain part of the site allocation and that reasons given for removal of this part of the allocation were incorrect.</p> <p>7. Concern that it is not possible to mitigate the negative impact on the SSSI.</p> <p>8. Concerns regarding the overall impact of the site allocation on the landscape, traffic and environment and in terms of its</p>	<p>LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>5. We do not believe Historic England's comments relate to the soundness of the plan. The councils and Historic England signed a Statement of Common Ground in December 2024 (examination library reference DUC03). This confirms that:</p> <p>'the Council notes and welcomes the general comments and edits offered by Historic England in relation to policies and supporting text. Whilst South and Vale believe that many of the suggestions are not soundness concerns, a view shared by Historic England, there are helpful modifications which improve the readability of the JLP. The Inspector examining the JLP will take a view as to the soundness of the JLP in light of the representation from HE'.</p> <p>6. Planning permission was granted at Sandhills (Land at Bayswater Farm, Bayswater Farm Road) on appeal, for planning application reference P24/S2074/O, for up to 76 dwellings and a care home, including open space and green infrastructure. The site's contribution will form part of the "sites with planning permission" under Policy HOU2. Given this has been granted permission, it is not considered necessary to allocate it again.</p> <p>7 & 8. South Oxfordshire's Planning Committee resolved to grant outline planning consent (P22/S4618/O) for Land at Bayswater Brook on 11 November 2024. This is subject to a) the relevant parties signing a Section 106 agreement, and b) planning conditions. Through the planning application process, the council has considered detailed evidence of the impact of this development on key designations, including the SSSI.</p>

Policy	Key issues raised	Councils' response to key issues raised
	design.	
Policy AS6: Rich's Sidings and Broadway, Didcot	<p>1. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated that improvements would be required to accommodate development, that appropriate ecological buffer zones should be provided and that flood risk from unmodelled channels needs to be considered.</p>	<p>1. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>We don't believe that the suggested changes to the policy regarding the ecological buffer zone are necessary, as Policy HP10: Watercourses and its supporting text set out the councils' position on buffer zone</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>3. The site promoter supported the inclusion of the policy and also commented that the allocation should make provision for phasing in order to optimise development.</p> <p>4. A developer raised concern that the policy gives no indication of the amount of retail floorspace being allocated and queried consideration of the sequential test and retail impact test. They stated the allocation of retail uses was contrary to NPPF (2023) paragraphs 90d and 90e.</p> <p>5. A developer highlighted that the site should not be within the town centre boundary.</p>	<p>requirements for watercourses. Making such a modification would therefore duplicate this.</p> <p>2. The Integrated Care Board (ICB) believes that this policy needs to be amended to include a specific criterion regarding primary health care provision. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1 (Infrastructure and service provision) sets an appropriate framework for securing infrastructure from new development.</p> <p>3. We welcome the support for Policy AS6. We are committed to working together with the site promoter to ensure the delivery of the site and both parties have signed a Statement of Common Ground. No changes are required to the policy. We do not consider that direct wording addressing phasing is necessary in the policy wording, as this can be considered at the planning application stage.</p> <p>4. & 5. We believe that Policy AS6 is consistent with the NPPF and its tests – the site is allocated to deliver a mixed-use scheme, and the policy defines that the mixed-use scheme would consist of homes, new employment and retail uses within Use Class E. We do not consider the points raised to be a soundness issue because the site allocation is situated within Didcot's recently reviewed town centre boundary – an element of retail would be appropriate at this site because it is within that boundary. We consider that this site allocation is very much part of the town centre – parts of the site are already currently used as, and appropriate for, town centre uses.</p> <p>Appendix 13 'Town Centre Boundaries and Primary Shopping Areas' of the South Oxfordshire Local Plan 2035 (examination library reference ALP01, adopted December 2020) depicts Didcot town centre boundary. This</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>boundary was reviewed by Nexus Planning in their Vale of White Horse and South Oxfordshire Town Centres and Retail Study (December 2023) (examination library references HES22, HES22.1 and HES 22.2). Table 9.3 (page 74) of the main report confirms that a review of current town and local service centre boundaries was carried out and highlights the recommendations for Didcot – there were no recommendations to alter the town centre boundary surrounding Rich's Sidings and Broadway.</p>
<p>Policy AS7: Land at Didcot Gateway, Didcot</p>	<ol style="list-style-type: none"> 1. Oxfordshire County Council recommended the policy state that a flood risk assessment is required, given the known surface water flood risk. 2. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated improvements would be required to accommodate development. 	<ol style="list-style-type: none"> 1. Regarding flood risk, Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require the developer to prepare a site-specific flood risk assessment to support a planning application on this site – therefore we are not proposing a modification to this policy. 2. We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions. <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. Thames Travel highlighted a need for a policy requirement for the provision of improved bus stopping facilities on the south side of Station Road.</p> <p>4. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>5. A developer highlighted that proposals on this site that include retail uses should be subject to the sequential test under Policy TCR2.</p> <p>6. A landowner raised detailed comments including:</p> <ul style="list-style-type: none"> a. querying why the Didcot masterplan was not referenced. b. querying sewage infrastructure improvements. c. suggesting that the policy encourage additional housing where opportunities 	<p>3. This level of detail is not necessary for a policy in a Local Plan, and we will consider such matters at the planning application stage.</p> <p>4. The ICB believes that this policy needs to be amended to include a specific criterion regarding health care mitigation. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1 (Infrastructure and service provision) sets an appropriate framework for securing infrastructure from new development.</p> <p>5. As highlighted in the policy text, the plan allocates Land at Didcot Gateway to deliver a mixed-use scheme comprising approximately 200 new homes, visitor accommodation, new employment and ancillary retail or other service provision to support the allocated site. 'Ancillary retail...to support the allocated site' is envisaged to be small scale (for example, a café, dry cleaner, convenience store, etc). As the retail is ancillary, and the site is not located in the town centre, we wish to clarify that the floorspace is limited to 500sqm, as per Policy TCR2. The councils intend to suggest a footnote modification to Policy AS7 to clarify this.</p> <p>6. & 7. We do not believe that any changes are required to the Policy as a result of these comments, as they do not affect its soundness. Please see response 2 above regarding sewage infrastructure improvements. We are committed to working together with the site promoters to ensure the delivery of the site and we have recently agreed and signed a Statement of Common Ground.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>arise and cautioning about deliverability of some bus priority measures.</p> <p>7. Multiple landowners also suggested some policy rewording.</p> <p>8. Concerns that the council failed to:</p> <ol style="list-style-type: none"> a. consider reasonable alternatives. b. base the decision to allocate this site for employment use on proportionate evidence. c. consult on the proposed change in accordance with their SCI. 	<p>7. See response to point 6 above.</p> <p>8. (a-c) We do not believe that any changes are required to the Policy as a result of these comments. Our Site Selection Topic Paper (examination library reference TOP07.1) explains how we applied new selection parameters to the HELAA sites that were considered appropriate for further consideration through the Joint Local Plan. We reviewed all of our existing allocated sites for their continued availability, achievability, and suitability to allocate for development. Alongside those allocations which passed this test, we identified 43 alternative sites to test through the Sustainability Appraisal (2024) (examination library reference CSD03).</p> <p>Didcot Gateway is not accounting for our employment needs – however, the site is in a relevant urban location within the highest tier of settlements, meaning that some employment use would be suitable here.</p> <p>The councils have consulted the public throughout the Joint Local Plan's production, in accordance with our SCI (examination library reference OCD02). The councils consulted the public about the Didcot Gateway site allocation, including the proposal for it to have a mixed-use development, as part of our Joint Local Plan Regulation 18 'Preferred Options' consultation in January to February 2024; and consistently continued to allocate the site with a mixed-use scheme in our Regulation 19 Joint Local Plan publication.</p>

Policy	Key issues raised	Councils' response to key issues raised
<p>Policy AS8: North West of Grove, Grove</p>	<ol style="list-style-type: none"> 1. Network Rail suggested the policy should make direct reference to mitigating public safety issues regarding the Grove Level crossing. 2. Historic England suggested the policy should require further heritage assessments. 3. Oxfordshire County Council suggested the policy should clearly require a flood risk assessment and include further green links for greater permeability to the adjacent Grove Airfield site. 4. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations. 	<ol style="list-style-type: none"> 1. The Infrastructure Delivery Plan (IDP) (examination library reference CSD05.1) includes a requirement in Appendix 2 (entry NWG23) to, where appropriate, improve connections across the Great Western Railway. The entry notes that this should include 'safety improvements to, or the closure of, footpath level crossings where development may result in a material increase in usage, in consultation with Network Rail', which directly addresses the issue raised by Network Rail. As this infrastructure requirement is set out in the IDP, we do not consider it necessary to modify the policy. Additionally, Policies LS1 (Proposals for large scale major development) and IN2 (Sustainable transport and accessibility) require a Transport Assessment and Travel Plan to be undertaken for this site, and therefore technical matters and mitigation measures would be addressed through the planning application process. 2. Policies LS1 (Proposals for large scale major development) and NH8 (The historic environment) require a Heritage Impact Assessment to be undertaken for this site, therefore no modification is required to this policy. 3. Regarding flood risk, Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require a site-specific flood risk assessment to be undertaken to support a planning application on this site - therefore no modification is required to this policy. The green links identified on the illustrative concept plan are indicative only, and further links could be identified through the masterplanning process. 4. The ICB believes that this policy needs to be amended to include a specific criterion regarding primary health care provision. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1 (Infrastructure and service provision) sets an appropriate framework for securing infrastructure from new development.

Policy	Key issues raised	Councils' response to key issues raised
	<p>5. The Environment Agency raised concerns that the Didcot Sewage Treatment Works is at or over capacity and improvements are needed to accommodate the development proposed through the JLP.</p> <p>6. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including:</p> <p>a. there should not be a requirement for extra care on this site, as there is an outline application at an advanced stage of the planning process.</p>	<p>5. For clarification, this site would drain to the Wantage STW rather than the Didcot STW; however, we note that the EA has concerns about the capacity at the Wantage STW, too.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>6. (a-h) We welcome the support for the inclusion of this allocation. In overall response to the requested changes, we do not consider they are matters of soundness that require a modification to the submitted plan.</p> <p>Regarding the viability of the site, please see paragraph 9.16 of our Joint Local Plan Viability Report (examination library reference ITV04) which explains why the site has been tested at Medium Values.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<ul style="list-style-type: none"> b. noise buffers should be multifunctional with public open space. c. the Viability Report has tested the site at Medium Values, despite being in a Low Value Zone, which may misrepresent the viability of the site. d. the IDP makes unreasonable requests which would not meet the tests of Regulation 122 and NPPF (2023). e. the completion of the Grove North Link Road should not be the responsibility of North West of Grove but of Monks Farm. f. signalling the Brook Lane Railway Bridge should not be in the policy. g. some changes were not outlined in the Preferred Options Consultation Statement, and have been added late in the plan making process. h. there is not enough flexibility in transport requirements. 	<p>On the point relating to the IDP, we believe the IDP identifies infrastructure that is necessary to make the development acceptable in planning terms, that is directly related to the development, and is fairly and reasonably related in scale and kind to the development. The evidence in the IDP is an appropriate level of detail for plan making, which we have secured through engaging with relevant stakeholders and drawing from the relevant evidence base document. At paragraphs 6.1 to 6.3 of the IDP (examination library reference CSD05.1), we set out that the infrastructure we secure on site at planning application stage would need to comply with the CIL regulations. Additionally, the completion of the Grove Northern Link Road and the Brook Lane Railway Bridge are existing infrastructure requirements of the Vale of White Horse Local Plan (Part 2) (examination library references ALP04 and ALP04.1), and their continued inclusion is supported by Oxfordshire County Council as the highways authority.</p> <p>We are committed to working together with the site promoter to ensure the delivery of the site and we have recently agreed and signed a Statement of Common Ground.</p>
Policy AS9: North West of Valley Park, Didcot	1. The landowner supported the inclusion of the policy; however, they raised detailed comments, including that they believe the site should be called 'Milton Fields' instead of 'North West Valley Park', to align with the original OS map.	1. The support is welcomed. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground. Additionally, we are happy to propose a minor modification to the site name to amend it from 'North West Valley Park' to 'Milton Fields'.

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Valley Park developers suggested the concept plan should include a buffer to the nearby Valley Park development.</p> <p>3. Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board requested additional policy wording regarding primary healthcare provision.</p> <p>4. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity.</p> <p>5. Concerns were also raised that the policy should consider a scenario where the</p>	<p>2. We do not consider this requested amendment to the concept plan to be a matter of soundness, therefore no modification is required to the policy.</p> <p>3. The ICB believes that this policy needs to be amended to include a specific criterion regarding primary health care provision. We don't believe this change is necessary to ensure the soundness of the plan as Policy IN1 (Infrastructure and service provision) sets an appropriate framework for securing infrastructure from new development.</p> <p>4. We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>5. We do not consider the point raised to be a concern, because the Housing Infrastructure Fund 1 (HIF1) outcome is known - planning permission has</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>Housing and Infrastructure Fund transport proposals for Didcot do not come forward.</p>	<p>been granted for the HIF scheme and it is fully funded. Further information regarding this can be found in the Secretary of State for Housing, Communities and Local Government's decision on granting planning permission for the HIF1 infrastructure scheme (examination library reference LPA06).</p>
<p>Policy AS10: Land at Dalton Barracks Garden Village, Shippon</p>	<ol style="list-style-type: none"> <li data-bbox="338 456 994 639">1. The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust raised concerns about the proximity of the allocation to the Cothill Fen SAC, nearby SSSIs and LWSs. <li data-bbox="338 935 994 1086">2. St Helen Without Parish Council suggested that reference is made to the Joint Wootton and St Helen Without Neighbourhood Plan. <li data-bbox="338 1238 994 1375">3. Thames Travel raised concern with the delivery of a mobility hub, noting that the site is not located on an established high-volume movement corridor. 	<ol style="list-style-type: none"> <li data-bbox="1016 456 2136 903">1. We have carefully considered the potential impacts arising from this site, supported by the conclusions reached in the HRA – Appropriate Assessment (examination library reference CSD04.1). The potential impact on the SAC that would arise from increased recreational pressure has been mitigated for in the form of the parkland on the western area of the site (retained as Green Belt), which is required as Suitable Alternative Natural Greenspace. There are specific requirements in this policy which address the potential impacts on the nearby designated sites. Hydrological catchments of the lowland fens have been modelled (see examination library reference NHL06) and considered through the HRA Appropriate Assessment. As such, we do not consider this objection requires any modification to the submitted plan. <li data-bbox="1016 935 2136 1198">2. The Wootton and St Helen Without Neighbourhood Plan is referenced in the supporting text of Policy AS14 (paragraph 8.103), which is also applicable to the area of Policy AS10. Planning applications must be determined in accordance with the development plan, which includes the local plan and neighbourhood plans, unless material considerations indicate otherwise. Therefore, it is not necessary to add an additional reference in this policy. <li data-bbox="1016 1238 2136 1375">3. The policy does not require the provision of large-scale mobility hubs (referred to as a 'major interchange hub' in OCC's Mobility Hub Strategy) on-site, rather it envisages off-site mobility hub sites (policy criteria 2) j) iii))

Policy	Key issues raised	Councils' response to key issues raised
	<p>4. The Environment Agency raised concerns with water quality, flood risk and the evidence base.</p> <p>5. Oxfordshire County Council commented on the delivery of employment uses on site, noting that use classes should be</p>	<p>and pedestrian and cycle access to them (criteria 2) j) xi)). This would be accompanied by bus stop provision within the site.</p> <p>4. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>5. We do not consider these requested changes are matters of soundness and nor are they in line with the approach taken with the other allocated sites. The plan's glossary defines employment land, and the amount of</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>stipulated and that the overall amount to be delivered be reviewed.</p> <p>6. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including:</p> <p>a. that land to the south and east needs to be safeguarded to enable sustainable access and travel solutions for the site.</p> <p>b. suggestions about extension of the allocation including the removal of additional land from the Green Belt.</p> <p>c. the creation of a new country park.</p> <p>d. concerns about the delivery of Gypsy and Traveller pitches.</p>	<p>employment has been justified in the Site Selection Topic Paper (examination library reference TOP07.1, paragraph 2.32).</p> <p>6. We welcome the support for the inclusion of this allocation. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground. In overall response to the requested changes, we do not consider they are matters of soundness that require a modification to the submitted plan:</p> <p>a. Transport safeguarding is not proposed by the councils where it is only required for vehicular access to one site and is not integral to a wider strategic transport scheme.</p> <p>b. We do not consider expanding the allocation is justified and there is no outstanding land use need that would warrant that. We also do not consider exceptional circumstances exist to amend the Green Belt in this plan.</p> <p>c. & f. – We consider that the 'country park' or, as the policy terms it, 'parkland' on the western side of the allocation (within the Green Belt) can satisfy the HRA – Appropriate Assessment's (examination library reference CSD04.1) mitigation requirement to divert potential recreational pressure away from the Cothill Fen SAC. This parkland is required as Suitable Alternative Natural Greenspace (SANG). The requirement for SANG was established in the HRA that supported the Vale Local Plan Part 2 (examination library reference ALP04).</p> <p>d. We have submitted evidence on the need for specialist housing for older people (see examination library reference TOP03.2 for details)</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>e. concerns with the concept plan.</p> <p>f. concerns with the requirements for Suitable Alternative Natural Greenspace (SANG).</p>	<p>and Gypsy and Traveller pitches (see examination library reference LPA01). The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA) executive summary was submitted to the examination in December 2024 (examination library reference HES13) and the full report (examination library reference LPA01) was submitted to the examination in February 2025. The GTAA was carried out in accordance with revised planning definition of 'gypsies and travellers' contained within annex 1 of the Planning Policy for Traveller Sites (PPTS, 2024) and justifies the need for pitches for gypsies and travellers. Our Housing Requirement, Affordable Housing, and Gypsies, Travellers and Travelling Show People Topic Paper (examination library reference TOP03.2) identifies how sufficient provision will be made through the plan to meet the need for pitches and justifies our approach to seeking pitch provision on the housing led allocations, such as this site. The Land at Dalton Barracks Garden Village site allocation is a suitable and sustainable location to meet some of this housing need (6-10 pitches).</p> <p>e. We consider the use of indicative concept plans for our larger sites is important in providing a spatial expression of the policy for each site, which then must be taken into consideration in the masterplanning process. Additionally, the site concept plans are labelled as indicative – therefore they are not 'set in stone' and detailed considerations regarding site layout will be agreed through the development management process. As a result, we do not consider it necessary to remove or amend the existing concept plan for this site.</p> <p>f. See response to point c above.</p>

Policy	Key issues raised	Councils' response to key issues raised
<p>Policy AS11: Culham Campus</p>	<ol style="list-style-type: none"> 1. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including: <ol style="list-style-type: none"> a. concern regarding the requirement for an approved masterplan, for which there is no need or justification given that there is a current masterplan that has been used in determining existing planning applications at the site and has been referenced by the Council in its decision-making. b. the allocation of 2.3ha does not reflect the full capacity of the site and should be used as a minimum figure (or removed entirely) 2. Oxfordshire County Council, the Lead Local Flood Authority, noted that the policy does not refer to the requirements of the Strategic Flood Risk Assessment Level 2, and that there are no provisions relating to flood risk within the site policy. 	<ol style="list-style-type: none"> 1. (a-b) In January 2025 the UK Government announced that it will deliver the first Artificial Intelligence (AI) Growth Zone at Culham, subject to the agreement of a public-private partnership that delivers benefits to the local area, the UKAEA's fusion energy mission and the UK's wider national AI infrastructure. The government and UKAEA will seek a private-sector partner who would develop one of the UK's largest AI data centres, beginning with 100MW of capacity and with plans to scale up to 500MW. <p>This landmark designation has the potential to deliver transformative economic, technological and infrastructure benefits at the local, regional and national level. While the precise details of the AI Growth Zone are yet to be confirmed, the government's clear commitment to the site provides a strong foundation for addressing future needs, including transport, flood resilience, and environmental sustainability. With this significant national backing, the vision for Culham Campus as a hub of innovation and growth is well positioned to be realised, ensuring that opportunities and challenges alike, such as those raised in this issue, will be met through a collaborative and forward-looking approach. Therefore, we do not consider any modifications necessary to this policy.</p> <p>We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p> 2. Regarding flood risk, Policies LS1 (Proposals for large scale major development) and CE6 (Flood risk) require a site-specific flood risk assessment to be undertaken to support a planning application on this site - therefore no modification is required to this policy.

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. Oxfordshire County Council also observed that the concept plan does not show the land safeguarded for the Housing Infrastructure Fund 1 (HIF1).</p> <p>4. The Environment Agency flagged issues regarding water quality and flood risk.</p>	<p>3. We note Oxfordshire County Council's comments in terms of the land safeguarded for the Housing Infrastructure Fund 1 (HIF1). The site concept plans are labelled as indicative – therefore they are not 'set in stone' and detailed considerations regarding site layout will be agreed through the development management process.</p> <p>4. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>5. Thames Travel welcomed the reference to improvements to the A4074 corridor, but cautioned that they are not defined, costly or clearly deliverable. They also flagged that due to security arrangements at the campus it is not clear that buses will be able to serve the allocation.</p>	<p>5. We have worked closely with Oxfordshire County Council as the highways authority throughout the production of the Joint Local Plan and our transport requirements are underpinned by the Oxfordshire Local Transport and Connectivity Plan (examination library reference LNP10). We consider our transport requirements to be justified and effective, and no modifications are required to this policy. Also see our responses to the key issues raised for Policies IN2 and IN3.</p>
<p>Policy AS12: Harwell Campus</p>	<p>1. The site promoter supported the inclusion of the policy, however they raised detailed comments, including that there are already two masterplans for Harwell Campus, so there is no need for another masterplan or SPD.</p> <p>2. Thames Travel stated that growth at this site may have impacts on the Strategic Road Network and Chiltern Interchange and set out steps they were taking to support a modal shift away from car use given the site's location remote location.</p>	<p>1. We continue to support the sustainable growth of Harwell Campus as an internationally important hub for science, innovation and research. Securing a masterplan for the comprehensive development of the campus is the most effective way to achieve this. This will ensure that development comes forward in a coordinated and comprehensive way, taking into account the impact on transport and landscape, and reflecting the campus location within the North Wessex Downs National Landscape (formerly AONB). There are currently no approved masterplans for the site. The policy therefore requires that the site owners work proactively with the council to develop a masterplan that details the principles and parameters to facilitate sustainable growth.</p> <p>We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p> <p>2. We have worked closely with Oxfordshire County Council as the highways authority throughout the production of the Joint Local Plan - and our transport requirements are underpinned by the Oxfordshire Local Transport and Connectivity Plan (examination library reference LNP10). We consider our transport requirements to be justified and effective, and therefore no modifications are required to this policy. Please also see our</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. The Environment Agency flagged issues regarding water quality and flood risk.</p>	<p>responses to the key issues raised for Policies IN2 and IN3, for further details regarding sustainable transport and transport infrastructure.</p> <p>3. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p>
Policy AS13: Berinsfield	<p>1. The Environment Agency made the same comments relating to water quality, flood</p>	<p>1. Please see our response to the Environment Agency's comments in Policy AS1, point 4.</p>

Policy	Key issues raised	Councils' response to key issues raised
Garden Village	<p>risk and evidence base on AS13 as they did on AS1.</p> <p>2. There was a suggestion that AS13 be combined with AS1 or renumbered alongside it.</p> <p>3. Oxfordshire County Council request deletion of Local Green Space designation.</p> <p>4. Comments that the BNG requirement needs to be amended from 10% to 20% in line with Policy NH2.</p>	<p>2. We do not consider this issue to be a matter of soundness. We are happy with the logic of the policies being separate and do not propose to modify the plan to combine these policies.</p> <p>We are committed to working together with the AS1 site promoter to ensure the delivery of the Garden Village policy and we are actively progressing a Statement of Common Ground.</p> <p>3. Paragraph 8.101 of the Joint Local Plan explains how this important open space was designated as Local Green Space in the South Local Plan (examination library reference ALP01). It goes on to state that the Local Green Space designation at Berinsfield meets the National Planning Policy Framework tests concerned. Therefore, no modifications are necessary to the Local Green Space designation.</p> <p>4. Our approach to BNG is supported through evidence in the document 'Assessment of sites' BNG potential' (examination library reference NHL11.1). We recognise that this policy requires a minimum of 10% BNG rather than 20%, as required by Policy NH2. We therefore agree that the policy requires amending to be consistent with Policy NH2 and propose a modification to AS13, to change the 10% BNG requirement to 20% (modification number MM12, examination library reference CSD01.1).</p>
Policy AS14: Dalton Barracks Garden Village	<p>1. Respondents raised that the policy should address how the area to the north of the allocation, which remains in the Green Belt and is covered by the Garden Village</p>	<p>1. The policy does not amount to an allocation of the land for development and as such it does not detail any requirements regarding the management of the land. Rather, the policy ensures that there is recognition that should any planning applications come forward on this land (outside of the AS10 allocation), that it should take account of the</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>area, will be managed.</p> <p>2. St Helen Without Parish Council raised that the policy needs to provide clarity on a number of topics such as green infrastructure and open space, highway mitigation, and preservation of rural character.</p> <p>3. The Environment Agency made the same comments relating to water quality, flood risk and evidence base on AS14 as they did on AS10.</p> <p>4. Oxfordshire County Council commented that the policy should be consistent with Policy AS13 (Berinsfield Garden Village).</p> <p>5. The site promoter generally supported the inclusion of the policy, though commented that the site allocation should be extended.</p>	<p>Garden Village status of this area.</p> <p>2. These points of clarification do not amount to matters of soundness that require a modification to the submitted plan, as we consider the policy and plan as a whole is effective.</p> <p>3. Please see our response to the Environment Agency's comments under Policy AS10, point 4.</p> <p>4. This allocation is supported by a detailed SPD, whereas AS13 Berinsfield Garden Village is not. Therefore, it is not necessary for this policy to be consistent with Policy AS13.</p> <p>5. We welcome the support for this policy and highlight that we do not consider there are exceptional circumstances to amend the Green Belt boundary through this plan. We are committed to working together with the site promoter to ensure the Garden Village policy and we are actively progressing a Statement of Common Ground.</p>
Policy AS15: Harcourt Hill Campus	<p>1. A local community group stated that the sport and leisure facilities and the greenspace provision on site are used by the local community and need to be safeguarded.</p>	<p>1. The adopted Vale of White Horse Leisure Facility Assessment and Strategy (2024) (examination library reference HPL04.4) advises that the sport and leisure facilities on site should be retained or enhanced as part of redevelopment unless an assessment has demonstrated that there is an excess of provision and they are surplus to requirements, or there is clear evidence to support their relocation.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. The Environment Agency raised significant concerns regarding the capacity of Oxford Sewage Treatment Works.</p>	<p>Policy AS15 requires that any development proposals should clearly address key site issues, including the provision or retention of sports facilities. Furthermore, Policy HP4 (Existing open space, sport and recreation facilities) includes a commitment to protect, maintain and where possible enhance existing open space, and Policy HP6 (Green infrastructure on new developments) requires development to protect or enhance existing green infrastructure. The sport and leisure facilities and the greenspace provision on site are therefore adequately safeguarded by the plan and adopted strategies, and therefore we do not consider it necessary to modify the plan.</p> <p>We are committed to working together with Oxford Brookes University to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p> <p>2. We have considered the impacts of development on flood risk through our Level 1 Strategic Flood Risk Assessment (SFRA) (examination library references CEQ 11 and CEQ11.1) and Level 2 SFRA (examination library references CEQ12 and CEQ12.1). We are also updating our SFRA to take account of the recent changes to the flood map for planning.</p> <p>We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>It should be noted that on 22 May 2025 the Environment Agency wrote to the councils updating their position on Oxford STW as Thames Water has now committed to a programme of upgrades that will provide sufficient capacity to accommodate planned development without causing a deterioration in water quality.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p>
Policy AS16: Vauxhall Barracks, Didcot	1. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated improvements would be required to accommodate development.	<p>1. We have considered the impacts of development on water quality through our Water Cycle Study (WCS) Scoping Report (examination library references CEQ18 and CE18.1). We are also working with the Environment Agency and other key stakeholders (such as Thames Water and neighbouring authorities where sewage treatment work catchments cross administrative boundaries) to produce a WCS Detailed Report, which considers the impacts of development on the water environment in further detail (including assessing sewage treatment works' capacity), as set out in the councils' response to the Main Issues (examination library reference LPA11). The WCS Detailed Report will be submitted before the next stage of hearing sessions.</p> <p>We have agreed a Summary Statement of Common Ground with the Environment Agency which provides an overview of each party's position on the SFRA, WCS and JLP policies (examination library reference</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Thames Travel stated that the policy needs a stronger hook regarding bus stops as the location is poorly served and that there must be opportunities for a new bus corridor through the site to Great Western Park; and that the site should be counted towards windfall numbers only.</p> <p>3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>4. The site promoter supported the inclusion of the policy.</p>	<p>LPA37). We are also working with the Environment Agency to agree a more detailed Statement of Common Ground before the next stage of hearing sessions.</p> <p>2. We do not consider the points raised by Thames Travel amount to matters of soundness that require a modification to the submitted plan.</p> <p>3. The ICB believes that this policy needs to be amended to include a specific criterion regarding primary health care provision.</p> <p>We don't believe this change is necessary to ensure the soundness of the plan, as Policy IN1: Infrastructure and service provision sets an appropriate framework for securing infrastructure from new development.</p> <p>4. We welcome the support for this policy. We are committed to working together with the site promoter to ensure the delivery of the site and we are actively progressing a Statement of Common Ground.</p>

Chapter 9: Town centres and retail

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 9	No key issues raised.	N/A
Policy TCR1: Centre hierarchy	<p>1. Disagreement with classification of:</p> <ul style="list-style-type: none"> a. Didcot, which should be classified as a principal town centre. b. Botley, which should be classified as a town centre. c. Crowmarsh Gifford, which should not be classified as village local centre. d. Watlington, which is not clearly justified by evidence. 	<p>1. The centre hierarchy is based on evidence and recommendations set out in the Town Centres and Retail Study December 2023 (examination library reference HES22).</p> <ul style="list-style-type: none"> a. We have not included a 'Principal Town Centre' tier in our Centre Hierarchy (as suggested in the above study, because we consider there may be unintended negative consequences of identifying Didcot as the Principal Town Centre in South and Vale. We have instead listed Didcot under the 'Town Centre' tier. b. Botley is already categorised as a Local Service Centre. Our evidence does not justify re-classifying Botley as a town centre. c. We have removed Crowmarsh Gifford from the list of village/local centres, as there is no longer any convenience retail provision here. d. We did not ask our consultants to undertake any research in relation to the health of our lower tier centres (i.e. village/local centres as defined in our adopted local plans). Instead, we used the findings from our own settlement assessment (primarily the quantum and distribution of retail/service uses) to guide our categorisation of individual centres within the Centre Hierarchy (see Settlement Assessment and Hierarchy Topic Paper (examination library reference TOP05.2)). We concluded that Watlington's retail and service provision was of a scale/distribution to warrant classification as a Local Service Centre. We then surveyed the centre on foot to determine current ground floor uses, and used

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. The Wallingford Neighbourhood Plan boundary should be used as it is clearer and has been considered more carefully at a local level.</p>	<p>mapping/aerial photography to help us define an appropriate centre boundary to include within our JLP policies map.</p> <p>2. The primary shopping area and town centre boundaries in Wallingford (as shown on the Policies Map) are based on the evidence set out in the Town Centres and Retail Study (December 2023). Until further evidence can be provided to justify the Town Council boundaries, there is no justification to revise our defined boundaries in any way.</p>
<p>Policy TCR2: Strategy for town and local service centres</p>	<p>1. Concern about the flexibility of parts of the policy and the fact it may be difficult to apply them given existing Permitted Development rights and flexibility introduced under Class E.</p>	<p>1. We recognise the policy limitations within the current national policy and legislative context, Policy TCR2 is specifically worded to say that, 'where planning permission is required', we will seek to prevent the loss of retail floorspace at ground floor level within Primary Shopping Areas, applying criteria against which proposals for change of use from retail or service uses will be assessed.</p> <p>By including this caveat, we will be able to consider whether we wish to apply Article 4 Directions in any of our centres, if evidence suggests they are needed to protect their future vitality and viability. This matter is specifically acknowledged in the supporting text of the policy at paragraph 9.14.</p>
<p>Policy TCR3: Retail floorspace provision (convenience and comparison goods)</p>	<p>1. Part 1(a) is vague and should not express a preference for 'brownfield/ regeneration sites within defined town or local service centres' as this could give preference to 'edge of centre' sites.</p>	<p>1. Giving preference to brownfield/regeneration sites within defined town or local service centres to accommodate new retail floorspace is consistent with paragraph 90(b) of the NPPF and will support the long-term vitality and viability of that centre. If no sites are available within the defined primary shopping area or town/local service centre boundary, then in accordance with the sequential test outlined in Policy TCR2 (Strategy for town and local service centres), we would expect a developer to look for a suitable edge of centre site that is well connected to the defined town or local service centre.</p>

Policy	Key issues raised	Councils' response to key issues raised
Policy TCR4: Retail and service provision in villages and local centres	No key issues raised.	N/A

Chapter 10: Well-designed places for our communities

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 10	1. Some respondents raised concerns that policies in this chapter contain unnecessary duplication between other policies and/or other guidance.	1. Certain design requirements in this chapter are repeated elsewhere in the plan. This repetition is justified in Chapter 10 as it sets out our design expectations in one place, helping to ensure that they are as clear as possible for applicants so that they understand how development can achieve high quality design. This approach is consistent with national policy at paragraph 132 of the NPPF, which states 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable'. We also refer to relevant guidance in supporting text (notably paragraph 10.8), so that applicants clearly understand what external guidance to consider when designing new developments.
Policy DE1: High quality design	1. Some respondents raised concerns about the length of the policy, noting that it duplicates requirements from other policies in the plan.	1. We recognise the policy includes design requirements, some of which reiterate other plan requirements but from a design perspective. However, this approach is justified as it clearly sets out the high-level design requirements for the districts in one policy. It's important that the plan's design expectations are clearly set out, so that applicants can gain certainty around what is expected from them when designing new development (in line with the NPPF paragraph 132). Our approach of collating the plan's high level design requirements in one policy to provide

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents suggested the policy is more restrictive than national policy, which allows for more flexibility in design.</p>	<p>applicants maximum clarity on how to achieve high quality design in the districts, ensure these requirements are easy to understand by grouping them by design theme under subheadings which relate to the Joint Design Guide (examination library reference DBE01). Therefore, although the policy is long, it can be read with ease and clarity, and it contains sufficient detail so that applicants are certain on how to deliver high quality developments.</p> <p>2. The requirements in this policy were developed having referred to national policy, notably the NPPF chapter 12, the National Design Guide (examination library reference DBE02) and the National Model Design Code (examination library reference DBE03 and DBE03.1). Policy DE1 is consistent with national policy and its related guidance, without adding new restrictions beyond what is referred to within it, whilst also allowing for sufficient flexibility in design where required.</p>
<p>Policy DE2: Local character and identity</p>	<p>1. Some respondents raised concerns that the policy will restrict sustainable development in some locations due to character.</p>	<p>1. Policy DE2 is not restrictive, and it can be justified. It is important that new development is sympathetic to character, as local character is what creates a sense of identity in our districts and helps to make them feel unique. This is consistent with national policy, as part 135c of the NPPF requires new developments to be sympathetic to local character and history. However, as set out in the policy's supporting text (paragraph 10.12, page 279), appropriate and sympathetic change or innovation may be acceptable where it responds positively to existing character. This is not restrictive, but also consistent with national policy, as part 135c of the NPPF goes on to state that whilst new developments should be sympathetic to local character and history, they should do so whilst not preventing or discouraging appropriate innovation or change. Therefore, the policy provides flexibility in part 1 to encourage more contemporary and innovative proposals in appropriate locations, provided that they make a positive contribution to the future character of an area. Therefore, the</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>policy will not restrict sustainable development.</p> <p>However, we would like to propose a modification to part 1 of the policy as follows:</p> <p>‘Contemporary and innovative proposals that will make a positive contribution to the <u>existing and</u> future character of an area will be supported in appropriate locations.’</p> <p>This is to ensure the policy is consistent with part 135c of the NPPF, recognising that contemporary and innovative proposals will need to make a positive contribution to not only future character, but also the existing character of an area. If agreed, this modification will be included in the next version of the modifications schedule.</p>
<p>Policy DE3: Delivering well-designed new development</p>	<p>1. Respondents suggested some policy requirements needed further clarification, including:</p> <ul style="list-style-type: none"> a. which applications would require design review. b. who should produce design codes and what they would include. 	<p>1. In response to part a. of this key issue, part 7 of Policy DE3 sets out which applications will likely require design review. However, the use of the term ‘likely’ within the policy text means that the applications that will go to design review will ultimately be decided on a case-by-case basis by the councils, having considered whether they are suitable to undergo design review and whether it would be beneficial for the scheme. In response to part b. of this key issue, paragraph 10.16 of the policy’s supporting text clarifies who should produce design codes, as it states neighbourhood plan groups may wish to undertake a design code as part of their neighbourhood plan. It also states that landowners and developers may choose to prepare design codes in support of a planning application for sites they wish to develop. The councils may also develop design codes, or assist neighbourhood plan groups, landowners and developers in creating their design codes. This is reflected in part 4 of our policy which sets out that design codes must demonstrate that they are prepared in</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Respondents raised concerns there was unnecessary duplication between this policy and other policies, particularly site allocations and Policy DE1.</p> <p>3. Respondents raised concerns that the level of engagement and review could slow down the delivery of development.</p> <p>4. Some respondents suggested design codes are more appropriate for the reserved matters stage, not as part of an outline application.</p>	<p>consultation with the councils.</p> <p>2. Part 1 of Policy DE3 sets out what should be included within a masterplan. Some of these requirements are found in other parts of the plan, such as in the site allocations and Policy DE1 (High quality design), however they are referenced in a different context. Therefore, the repetition in this policy is necessary. The requirements set out in part 1 of Policy DE3 provide clarity for applicants regarding what the councils expect a detailed masterplan should include to ensure well-designed development is realised and delivered on the ground.</p> <p>3. Parts 4, 5 and 6 of Policy DE3 set out requirements regarding engagement and collaboration with the local community. This includes requiring the community and other stakeholders to be involved in the masterplanning process and the development of design codes, utilising innovative engagement methods where possible. We do not envisage this level of engagement will slow down the delivery of development, but will ensure that there is effective engagement with local communities and stakeholders in the planning process to ensure better outcomes for determining these applications. This approach reflects national policy at parts 131 and 134 of the NPPF.</p> <p>4. Design codes should be drafted as early on as possible to maximise their influence in the planning process and to design in better outcomes for schemes when determining the planning application. Therefore, the reserved matters stage would in most cases be too late to create a design code in order for it to influence the development, but the design code could be reviewed and revised at this stage if necessary.</p>

Policy	Key issues raised	Councils' response to key issues raised
<p>Policy DE4: Optimising densities</p>	<ol style="list-style-type: none"> <li data-bbox="353 236 1003 341">1. Some respondents suggested the policy is too vague and does not add further detail to national requirements. <li data-bbox="353 900 949 1005">2. Some respondents suggested the requirements for dwellings per hectare (dph) is unevidenced and unjustified. 	<ol style="list-style-type: none"> <li data-bbox="1032 236 2134 861"> <p>1. Policy DE4 clearly introduces an expectation for the delivery of 45 dwellings per hectare for Tier 1 and 2 settlements, which adds further detail to national requirements. The policy has been assessed in the Viability Report (examination library reference ITV04, see page 26) which found that it:</p> <p>‘encourages careful consideration of density and encourages suitable densities in the right locations. This is likely to deliver attractive development, improving viability rather than hindering it’.</p> <p>The report also confirms that ‘the requirement for 45 dph...will have a direct impact (on viability) and is reflected in our viability modelling’.</p> <p>The report tested the cumulative effect of all policies (including Policy DE4) with other development value and cost assumptions, and it demonstrates that development would be viable to implement in the districts with the Joint Local Plan’s policy requirements.</p> <li data-bbox="1032 900 2134 1337"> <p>2. Policy DE4 continues to reflect the approach of the adopted Policy STRAT5 (Residential Densities) of the South Oxfordshire Local Plan 2035. Policy STRAT5 was justified by a Densities Topic Paper which demonstrated that we should be requiring higher densities and setting an approach which concentrates higher densities where there are sustainable transport opportunities in accordance with the NPPF. The South Oxfordshire Authority Monitoring reports 2021-2022 and 2022-2023 (examination library reference OCD07 and examination library reference OCD07.1) evidence that this approach to densities is justified, with development densities responding to the context and features of each site. As this approach has been successful, Policy DE4 is both justified and evidenced.</p>

Policy	Key issues raised	Councils' response to key issues raised
Policy DE5: Neighbouring amenity	No key issues raised.	N/A
Policy DE6: Outdoor amenity space	No key issues raised.	N/A
Policy DE7: Waste collection and recycling	1. Oxfordshire County Council (OCC) suggested the policy should be clearer that that waste management proposals would be considered by OCC as the Waste Planning Authority.	1. This issue relates to Oxfordshire County Council's Regulation 19 response, which requested that Part 5 of Policy DE7 is 'clear that waste management proposals would fall to be considered by Oxfordshire County Council as Waste Planning Authority'. Part 5 of the policy already refers to OCC and sets a clear requirement for their waste and circular economy team to be consulted at an early stage regarding innovative recycling and waste collection and management proposals. Therefore, we do not consider that a modification is necessary to this policy.

Chapter 11: Healthy places

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 11	1. Some respondents raised concerns regarding the Joint Local Plan Health Impact Assessment, particularly: <ul style="list-style-type: none"> a. that it had not meaningfully informed plan preparation. 	1. Regarding the Health Impact Assessment: <ul style="list-style-type: none"> a. The Health Impact Assessment (examination library reference CSD07) and (examination library reference CSD07.1) was undertaken between our Regulation 18 Part 2 Preferred Options Consultation and our Regulation 19 Publicity Period, to ensure that health impacts had been evaluated, and any outcomes integrated, prior to submission of the plan to the Secretary of State.

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. that a different methodology should have been used.</p> <p>c. Oxfordshire County Council suggested restricting hot food takeaways is required to mitigate potential negative impacts of policies TCR1 and TCR2.</p> <p>2. One respondent suggested the Playing Pitch Strategy leaves ambiguity in what supporting ancillary facilities are required for pitch provision.</p>	<p>b. The Health Impact Assessment was prepared in accordance with the Oxfordshire HIA Toolkit (examination library reference HPL03), agreed by the Oxfordshire Growth Board in 2021 for use by all six Oxfordshire Local Authorities. We consider this to be an appropriate methodology for our districts.</p> <p>c. We have chosen not to pursue a policy that restricts hot food takeaways in the districts. We are in the fortunate position in South Oxfordshire and Vale of White Horse where the general picture shows us to be similar or better than the English benchmark in terms of childhood obesity. As a result, our health statistics do not currently demonstrate a need or justification for such a policy in the Joint Local Plan.</p> <p>2. As requirements for supporting ancillary facilities are set out in guidance by Sports England and the relevant National Governing Bodies, it is not the role of the Playing Pitch Strategy to set these detailed requirements.</p>
Policy HP1: Healthy place shaping	<p>1. Respondents raised concerns that the requirement to produce a Health Impact Assessment (HIA) is too onerous and would cover too many applications.</p>	<p>1. We do not consider the requirement to produce a Health Impact Assessment (HIA) to be too onerous or cover too many applications. HIAs are an important mechanism to ensure that health and wellbeing is considered in planning and design decisions, helping to maximise any positive health impacts and reduce negative impacts of development. HIAs will help to address health inequalities, improve accessibility, and maximise the health and wellbeing of residents across the districts. The policy requires HIAs to be submitted for major development proposals, which we consider to be an appropriate scale of application to produce a HIA. The policy also states that HIAs 'should be undertaken at a scale that is proportionate to a proposed development', and therefore the level of detail provided in a HIA will relate to the application and therefore should</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents suggested as a plan wide HIA has been undertaken, individual HIAs for applications are unnecessary.</p> <p>3. Some respondents suggested the Oxfordshire Health Impact Assessment Toolkit or equivalent document should be given regard to, not required to be followed.</p>	<p>not be an onerous requirement. Additionally, HIAs are already a requirement of both adopted local plans, as they are required to be submitted for all housing site allocations in Vale of White Horse, and for all strategic development in South Oxfordshire. Requiring HIAs to be submitted for all major development in the districts will ensure that health and wellbeing is considered and optimised in planning decisions more widely.</p> <p>2. The Joint Local Plan HIA assessed the Joint Local Plan's policies. Its geographical scope covered both districts, with the baseline covering both South Oxfordshire and Vale of White Horse. This is a much higher scale than would be undertaken for a planning application HIA. A planning application HIA would focus on a much smaller area, likely establishing a baseline at the parish level. Therefore, the information established through the Joint Local Plan HIA would not be sufficient at the planning application level, meaning individual HIAs that are localised and tailored to the application, are indeed necessary.</p> <p>3. It is important that the HIAs submitted to the councils are of a high quality and consistent in how they are presented so that they can be easily reviewed by officers. Requiring applicants to follow the Oxfordshire Health Impact Assessment Toolkit will help to ensure that HIAs submitted to us are consistent and include/assess all that they should. This will help applicants to produce HIAs that have a demonstratable impact on their developments, supporting the creation of well-designed, healthy, safe and inclusive places.</p>
Policy HP2: Community facilities and services	1. Respondents commented that the policy should reference the needs of minority religious groups.	1. We do not believe that this is a soundness concern, and no change is necessary. The policy sets out where the councils would support the development of new, and alterations to, places of worship for all religions as community facilities are included in the policy.

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Respondents suggested potential changes to the policy, citing:</p> <ul style="list-style-type: none"> a. removing reference to viability of a facility as consideration for change of use. b. expanding definition of community uses to include other types of education facilities. <p>3. Some concerns were raised about educational sites, including:</p> <ul style="list-style-type: none"> a. community uses cannot be delivered on education estate. b. the policy will be too restrictive for schools looking to restructure their estate. 	<p>2.</p> <ul style="list-style-type: none"> a. It is important to retain viable community assets as required by the NPPF (paragraph 20, criteria c and paragraph 88, criteria d). We acknowledge there may be instances where an applicant cannot find an economically sustainable community use for the site. In these instances, the policy allows considerations for alternative uses where justified, rather than allowing buildings or facilities to become disused or abandoned. b. The policy aligns with the uses defined by the Town and Country Planning (Use Classes) Order 1987. We are not aware of educational uses falling within any other use class, other than Use Class F2, which is covered by the policy. <p>3.</p> <ul style="list-style-type: none"> a. This is not restricted by the policy. We are aware of a number of examples where schools (including academy trusts) have signed community use agreements to share leisure facilities with the local community. Schools have signed these with a developer at planning application stage, or with the local community and district councils if not associated with any new planning application or development. b. The policy recognises the need of schools to restructure their estates. Clause 1a) of the policy supports replacing and reconfiguring schools as community facilities, provided the community affected by the change still receives equivalent or improved services. Paragraph 11.16 a) of the supporting text expands on the circumstances in which we would

Policy	Key issues raised	Councils' response to key issues raised
		<p>support such changes. The plan recognises that education facilities can serve more than one community, and requires decision makers to consider the strategic nature of education provision. For example, the loss of capacity on one school site, to consolidate onto another site may result in equal, or even better education services for the affected community.</p>
<p>Policy HP3: Health care provision</p>	<p>1. Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board commented that requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facilities adds unjustified delay to vital reinvestment in local health facilities/services.</p>	<p>1. Policy HP3 identifies 3 circumstances where the councils would support the change of use of healthcare floorspace (where a planning application is required). An applicant would not need to satisfy all three of these criteria, just one of them. We believe there is sufficient flexibility to cover a range of circumstances permitting a change of use.</p>
<p>Policy HP4: Existing open space, sport and recreation facilities</p>	<p>1. Comments identified locally specific issues from the councils' leisure facilities assessment and strategy (LFAS).</p>	<p>1. The councils recently adopted their Leisure and playing pitch strategies (LFAS and PPS respectively) (examination library reference HPL04.3 for South Oxfordshire) and (examination library reference HPL04.4 for Vale of White Horse) in November 2024. We consulted on the LFAS and PPS (examination library references HPL05 to HPL05.3) in April 2024 and made changes to the strategies after we had reviewed the comments we received. We also made minor factual changes following each councils' Scrutiny Committee meetings, held in November 2024. The councils are confident the strategies are robust, compliant with Sport England guidance and being prepared in partnership with Sport England, and they are a proportionate evidence base to inform the JLP.</p>
<p>Policy HP5: New facilities</p>	<p>No key issues raised.</p>	<p>N/A</p>

Policy	Key issues raised	Councils' response to key issues raised
for sport, physical activity and recreation		
Policy HP6: Green infrastructure on new developments	<ol style="list-style-type: none"> 1. The policy should reference the protection of Strategic Green Infrastructure areas, which as drafted does not fully meet NPPF (2023) requirements. 2. Oxfordshire County Council suggested the policy directly references: <ol style="list-style-type: none"> a. information in evidence documents instead of referencing the evidence documents more generally (in particular regarding the Urban Greening Factor target). b. the Oxfordshire Local Nature Recovery Strategy. 	<ol style="list-style-type: none"> 1. The NPPF does not require local plans to identify areas to be protected as Strategic Green Infrastructure area. It does, however, require plans to 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure' (para 181). The Green Infrastructure Strategy and Open Space Study (examination library reference HPL02) which informs this policy undertook a strategic review of green infrastructure in the districts. 2. Regarding suggestions from Oxfordshire County Council: <ol style="list-style-type: none"> a. As drafted, the policy requires applicants to meet the needs set out in the Green Infrastructure Strategy and Open Space Study (examination library reference HPL02), which would include the Urban Greening Factor Standard identified in this document. Detailed guidance is not reproduced in the policy for simplicity because there are a number of targets or recommendations for relevant sites to consider. b. Both the supporting text to the policy and the Green Infrastructure Strategy and Open Space Study (examination library reference HPL02) reference the relationship between maintaining and enhancing green infrastructure and the Oxfordshire Local Nature Recovery Strategy (LNRS).
Policy HP7: Open space on new developments	No key issues raised.	N/A

Policy	Key issues raised	Councils' response to key issues raised
Policy HP8: Provision for children's play and spaces for young people	1. Some respondents queried and purpose and application of Part 7 of the policy, which requires developers of large-scale major development to undertake assessments of existing play facilities within the surrounding area to provide complementary provision.	1. The purpose of Part 7 of the policy is to ensure that new play provision on large-scale major development is complementary to nearby existing play provision. This avoids the oversaturation of any particular type of play equipment or provision for young people which was recommended by our evidence in the Green Infrastructure Study (examination library reference HPL02). This is outlined in the supporting text to the policy (paragraph 11.47).
Policy HP9: Provision of community food growing opportunities	1. Some respondents suggested the policy should encourage community food growing opportunities, rather than require them.	1. The quantity standard in Policy HP9 is justified by the Green Infrastructure Strategy and Open Space Study (examination library reference HPL02), which reviewed the current level of provision, the national and local policy context, and undertook public consultation, to inform local standards.
Policy HP10: Watercourses	<p>1. Cumulative effect of policies in the plan make development unviable, e.g., HP10 requirements.</p> <p>2. Concern regarding the 10m buffer zone, citing:</p> <p>a. there is no evidence to support a 10m buffer.</p> <p>b. it should not apply to canals.</p>	<p>1. We do not have concerns that Policy HP10 will make development unviable, as the Policy HP10 has an indirect viability impact and has been assessed in the Viability Report (examination library reference ITV04).</p> <p>2. Policy HP10 continues to reflect the adopted Policy ENV4 (Watercourses) of the South Oxfordshire Local Plan 2035.</p> <p>a. The policy adopts a 10m buffer zone approach, which was justified in the South Oxfordshire adopted Local Plan 2035 Natural Environment Topic Paper. This paper identified the requirement of a 10m buffer zone based on Environment Agency recommendations, which is a figure consistently applied by other local planning authorities. Since the adoption of ENV4 in the South Oxfordshire adopted Local Plan 2035, no applications have been approved contrary to technical advice on the impact on watercourses.</p> <p>b. As identified in the Glossary of the Joint Local Plan (examination library reference CSD01, Appendix 1), watercourses refer to main rivers,</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. the approach will restrict the developable area of sites and overall housing delivery.</p> <p>d. a need for further clarity on what constitutes a smaller buffer zone (in Part 2 of the policy).</p> <p>e. the need for a clearer definition on where it will be measured from, raised by the Environment Agency.</p> <p>f. the need to optimise opportunities to remove hard bank protection and infrastructure from the buffer zone, raised by the Environment Agency.</p>	<p>(larger rivers, brooks and streams) and ordinary watercourses (headwaters and smaller brooks and streams). Canals are not referenced in the glossary definition; therefore, the policy does not apply to canals.</p> <p>c. HP10 sets out that development of land that contains, is adjacent to, or has hydrological links with, a watercourse must protect and, where possible, enhance the function and setting of the watercourse and its biodiversity. This will influence the layout of sites, but it will not restrict overall housing delivery in the districts. The concept plans for the JLP allocated sites have built in this consideration, and as indicated in Policy HOU2 (Sources of housing supply), we have a sufficient supply of housing within the plan period.</p> <p>d. Policy HP10 provides an example as to where a 10m buffer zone is not considered possible, such as in dense urban areas where existing development comes closer to the watercourse. It allows for a smaller buffer zone accompanied by detailed plans to show how the land will be used to promote biodiversity and how maintenance access to the watercourse will be created or maintained. No further clarity is required, as this will be dealt with on a case-by-case basis.</p> <p>e. Paragraph 11.61 of the JLP supporting text includes this definition.</p> <p>f. Paragraph 11.62 of the supporting text states that proposals should seek to reinstate buffer zones where previous land uses or development have not provided this and it should be free from built development and formal landscaping.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>3. The policy is unclear on how it applies to canals.</p> <p>4. The policy approach to culverting is overly restrictive.</p>	<p>3. See response 2(b).</p> <p>4. The policy wording states that development 'should' avoid the culverting of any watercourses, and so is not overly restrictive.</p>

Chapter 12: Nature recovery, heritage and landscape

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 12	<p>1. Respondents raised concern about the lack of Habitats Regulations Assessment (HRA), particularly with respect to air quality impacts on Oxford Meadows, Cothill Fen and Aston Rowant SACs.</p> <p>2. Oxford Preservation Trust suggested the need for a specific policy to protect the green setting of Oxford city.</p> <p>3. There should be a more balanced approach between environmental, social and economic pillars, with some</p>	<p>1. Please refer to our response to Main Issue 11 (Habitats Regulations Assessment), Q1.34 of our Matter 1 Written Statement (examination library reference WS1/1) and to the Councils' response on HRA on page 155 and 156 below.</p> <p>2. A specific standalone policy on the green setting of Oxford is not necessary because we already have the Oxford Green Belt and policy provision within Policy NH6 (Landscape). NH6 Part 3 only permits development where it protects and, where possible, enhances the features and functions that contribute to the nature and quality of the landscape, including: '(g) good quality views and visually sensitive skylines, including the Oxford View Cones and their backdrops/settings'. We have made specific provision in our site allocation Policy AS5 (Land at Bayswater Brook) to protect the designated Oxford view cone which lies directly to the west of the allocated site.</p> <p>3. There are 12 JLP objectives which underpin the Plan – these carefully balance the environmental, social and economic objectives of both councils, and reflect the priorities in the adopted Corporate Plans for South</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>respondents suggesting too much emphasis is put on the environment, although some respondents welcome the ambition to achieve a high-quality environment, and suggested more protection should be given to designated sites.</p>	<p>and Vale. Policy NH1 (Biodiversity Designations), as well as national legislation, gives an appropriate level of protection to designated sites.</p>
<p>Policy NH1: Biodiversity designations</p>	<ol style="list-style-type: none"> 1. While there was support for the policy's requirements around lowland fens, some respondents raised concerns that clarity was needed on application. 2. Oxford City Council and Oxfordshire County Council raised concerns about the evidence and application of the policy for Lowland Fens. 	<ol style="list-style-type: none"> 1. We agree – since the provisions in part 6 of Policy NH1 for assessing harm to lowland fens are a new area of local plan policy for us (and will be for many applicants), we are producing a guidance note to support the implementation of the requirements. 2. Oxford City Council raised concerns regarding the lack of discussion on the study's methodology and for failing to raise issues of sensitivity arising with Oxford City. The concerns raised by Oxford City Council at Regulation 19 in relation to lowland fens are addressed at paragraph 2.111 and Appendix 1 Point 12 of the Statement of Compliance with the Duty to Cooperate (examination library reference CSD09.1). In this document we explain that in response to their concerns, we have included a modification to the policies map (modification number PM06, examination library reference CSD01.1) to remove any mapping outside of South and Vale including lowland fens and their catchments, as this content was displayed in error at the Regulation 19 stage. We also explain that the matter of lowland fens is not a strategic matter, nor does the study give rise to any significant impacts on two or more planning areas. Regarding discussion on the methodology, we note that we shared the brief for the study with Oxford City, and we invited questions and discussion about the commission however Oxford did not ask any (nor did they highlight their own approach). In our Statement of Common Ground with Oxford (examination library reference LPA38), the City Council has confirmed that

Policy	Key issues raised	Councils' response to key issues raised
		<p>they have reflected on their representations on lowland fens and their implications, and accept that this is not a strategic matter.</p> <p>The concerns raised by Oxfordshire County Council at Regulation 19 in relation to lowland fens are addressed at paragraphs 21-23 of the Statement of Common Ground with Oxfordshire County Council (examination library reference DUC06). In this Statement of Common Ground we explain that Oxfordshire County Council had some queries about the Lowland Fens evidence report, and suggested modifications to the policy supporting text. We explained that there is potential for minor modifications to be explored during the examination of this matter, and that we will endeavour to produce a guidance note on the implementation of Policy NH1.</p>
Policy NH2: Nature recovery	<p>1. Some respondents raised concerns about the policy's 20% Biodiversity Net Gain (BNG) requirement, which exceeds the national requirement for 10% BNG, citing:</p> <ul style="list-style-type: none"> a. insufficient justification. b. impacts on viability. c. impacts on development delivery. d. lacks flexibility. 	<p>1. (a-d) Please see our response to Main Issue 8 in the Councils' response to Main Issues (examination library reference LPA11) where we address points a and b on our justification for requiring at least 20% Biodiversity Net Gain (BNG) in the districts, and its impact on viability.</p> <p>Regarding point c, as a requirement for at least 20% BNG is viable in the districts, there should not be negative impacts on development delivery. The development capacity of sites should not be reduced by a higher BNG requirement as the statutory BNG framework allows for the delivery of BNG off-site if needed.</p> <p>Regarding point d, alternative, more flexible BNG requirements were tested through the sustainability appraisal process at the preferred options stage (examination library reference LPP03), for example applying different minimum BNG requirements for different types of development and/or development in different parts of the districts. Whilst this option scored similarly to the chosen policy approach, the SA identified that</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents raised concerns about the approach to off-site BNG delivery, questioning whether:</p> <ul style="list-style-type: none"> a. appropriate costs have been viability tested. b. there is a sufficient supply of off-site units within the districts. c. the sequential approach for off-site BNG should consider county/Local Nature Recovery Strategy scale. <p>3. Some respondents raised concerns that the requirements for features to support wildlife do not align with PPG and/or best practice.</p>	<p>biodiversity benefits could be reduced and so this approach was not taken forward in the Joint Local Plan.</p> <p>2. The approach to off-site BNG is appropriate, because:</p> <ul style="list-style-type: none"> a. The viability testing applied appropriate, locally specific, evidenced costs, as set out in the Councils' response to the Inspectors' Initial Questions (examination library reference LPA02) at IQ65. b. There are established habitat banks already operating in both districts and a pipeline of future sites expected to come forward over the plan period. For more information, please see Section 6 of the Justification for Higher Biodiversity Net Gain Topic Paper (examination library reference TOP04.1) which sets out the opportunities for delivering BNG off-site in the districts and demonstrates a growing habitat bank market. c. We tested alternative sequential approaches for off-site BNG through the sustainability appraisal process at the preferred options stage (examination library reference LPP03). We consider it appropriate to prioritise off-site BNG delivery within the same district or, if that is not possible, within the wider Joint Local Plan area, to help make up for past local biodiversity losses. <p>3. Our requirements for features to support wildlife are intentionally flexible to allow appropriate approaches on a site by site basis. Some respondents pointed to paragraph 023 of the Natural Environment section of the PPG. However, this was deleted from the PPG in February 2024.</p>

Policy	Key issues raised	Councils' response to key issues raised
Policy NH3: Trees and hedgerows in the landscape	1. Some respondents raised concern about policy requirements going above and beyond what is required from national policy (to enhance existing trees, woodlands and hedgerows, and provide a net gain in canopy cover).	<p>1. In asking that development makes every effort to retain, protect and enhance existing trees, woodlands, hedgerows and by encouraging the provision of a net gain in canopy cover, Criterion 1 of Policy NH3 sets out a positive strategy that aligns with, and builds upon, NPPF paragraph 136, as well as aligning with the Hedgerows Regulations 1997.</p> <p>Whilst NPPF paragraph 136 addresses the important contributions that trees make to our environments, and how to take opportunities to incorporate them within developments, the policy extends this approach to hedgerows and encourages development proposals to provide a net increase in tree canopy cover where this is possible. We consider it particularly important to address hedgerows and canopy cover, being two predominantly rural authority areas where wooded areas amount to some 9,392ha in South Oxfordshire and 4,723ha in the Vale of White Horse. Biodiversity and climate change benefits from increased canopy cover include increased wildlife habitat, increased rainwater control, and improved air quality.</p> <p>We therefore consider that the policy is justified, and its approach is sound.</p>
Policy NH4: Chilterns and North Wessex Downs National Landscapes	1. Concern that the policy does not align with the NPPF (2023) in terms of the setting of National Landscapes, which respondents felt should be considered on a case-by-case basis.	1. The recently revised National Landscape duty requires relevant authorities to actively take 'appropriate, reasonable, and proportionate steps' to further the statutory purposes of protected landscapes, replacing the previous requirement for authorities to 'have regard to' their statutory purposes. Under Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA), authorities must 'seek to further' the purposes of protected landscapes, rather than simply 'have regard to' them, as they were previously, with guidance making clear this is an 'active', 'not passive' duty.

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Some respondents raised potential duplication with NPPF (2023) requirements and suggested additional flexibility in the policy.</p>	<p>We therefore consider that the policy sets out requirements that align with, and build upon, national policy requirements and the Levelling Up and Regeneration Act 2023. The policy requirements are justified through this heightened duty, and we therefore do not consider it necessary to modify the policy.</p> <p>2. We consider it is appropriate to have a specific policy for National Landscapes which require specific protection by law, particularly because 42% of South Oxfordshire and 23% of the Vale of White Horse lie within National Landscapes.</p>
<p>Policy NH5: District-Valued Landscapes</p>	<p>1. Concern that the district-valued landscapes will negatively impact the delivery of development.</p> <p>2. The policy wording differs from national policy and guidance, citing:</p> <p>a. it should refer to quality only, not special characteristics and significance.</p>	<p>1. This policy is encouraging and also supportive of development that protects and enhances district valued landscapes. It requires that development has regard to the Joint Local Plan Valued Landscape Assessment (or subsequent update) and that proposals are designed to respond appropriately to it. We have comprehensively justified Policy NH5 through the Local Landscape Designation Review (examination library reference NHL16) and therefore do not consider it necessary to modify the plan, as the policy will not negatively impact development delivery.</p> <p>2. We believe the policy wording is consistent with national policy and guidance:</p> <p>a. Policy NH5 is positively prepared, and its approach aligns with, and builds upon, the requirements in NPPF paragraphs 180-182. The NPPF paragraph 180 refers to protecting and enhancing valued landscapes, sites of value and soils in a manner commensurate with their statutory status or identified quality in the development plan. We have identified the quality of the valued landscapes and therefore identified them in the plan, then set out that development which protects and enhances the districts' valued landscapes will be</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. the requirement for any valued landscapes to demonstrate a degree of excellence.</p> <p>3. Concern about the robustness of evidence and methodology used in proposing designations, citing:</p>	<p>supported. The evidence base (examination library reference NHL16) and (examination library reference NHL16.1) identifies the special characteristics and significance of our district-valued landscapes, which will help make the policy effective.</p> <p>b. Responses queried why the terms 'excellence' or 'excellent' do not appear in the JLP valued landscapes evidence base. They referred to the Landscape Institute's Technical Guidance Note (TGN) 02-21 and queried why there was no analysis as to whether areas demonstrated a 'degree of excellence'. We believe these responses have misinterpreted the TGN. TGN paragraph A4.2.6 (page 41) describes two interpretations of the NPPF's phrase 'identified quality in the development plan' and states 'in both cases it is assumed that the word 'quality' means degree of excellence'. Though the JLP landscape evidence base does not directly use the words 'excellence' or 'excellent', we believe that the Local Landscape Designation Review and its Appendix (examination library references NHL16 and NHL16.1) clearly address the identified quality of landscapes in their 'Criteria for identifying Valued Landscapes', where Criterion 2 is directly titled 'Landscape Quality' – defined as 'the physical state of the landscape, intactness of the landscape and the condition of individual natural and cultural elements e.g. hedgerows'.</p> <p>3. We believe that the Local Landscape Designation Review and its Appendix - Results of Desk-Based Scoping Exercise prepared by LUC (examination library references NHL16 and NHL16.1) provide a robust evidence base supporting Policy NH5. Natural England were involved as stakeholders in our new landscape evidence (see Statement of Common Ground with Natural England, examination library reference DUC05). Paragraph 1.2 (Page 5) of NHL16 clearly confirms that the review: 'identifies and maps valued landscapes in the study area at the district</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>a. the requirement for proposals to be proportionate, with some respondents concerned that the designations were too large.</p> <p>b. unclear boundaries and their relationship with Landscape Character Areas.</p>	<p>scale and provides a description of the special characteristics and features of these areas (Local Landscape Designations (LLDs). The Valued Landscapes Assessment also provides recommendations and guidance for the positive management of the LLDs to retain and enhance their special characteristics'.</p> <p>a. Regarding the size of some of the new local landscape designations, we acknowledge that our districts have many areas of landscape value, however, the Local Landscape Designation Review utilised a robust methodology to identify district-valued landscapes (classed as local landscape designations) that we consider are a sufficient size, meet the criteria set out and form a coherent, recognisable area. The review clearly highlights how sizes/areas have been considered in paragraph 2.21, page 11: 'LLD (local landscape designation) areas defined through this study should be of a sufficient size and form a coherent recognisable area at a district scale. A single important feature or site is not, on its own, enough to merit landscape designation at this scale. The following points are relevant: - 'Is the area of sufficient size to make it practical to develop policies for its protection, management and planning at the district scale? - Is the area recognisable as a cohesive place or entity, of consistent character at the district scale?'</p> <p>b. Regarding boundaries, South Oxfordshire and Vale of White Horse's district-valued landscapes are clearly shown on the zoomable interactive Policies Map (examination library reference CSD02) and in Appendix B of the Local Landscape Designation Review, at the start of each 'Full LLD area profile' (examination library reference NHL16). The policy requires proposals that are within an area designated as a district-valued landscape to consider and respond appropriately to the relevant area profile(s) in the Joint Local Plan Valued Landscapes</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. differences between local plan and neighbourhood plan valued landscape designations.</p> <p>d. it does not follow the latest guidance.</p>	<p>Assessment, which will be used when assessing applications. Regarding LLD boundaries and their relationship with LCAs (Landscape Character Areas), paragraph 2.20 clarifies: 'The review uses the framework of the Landscape Character Areas (LCA), of which there are 44. However, it should be noted that the Landscape Character Assessment is based on broad variations in landscape character and not quality and value. There may, therefore, be differences in boundaries between the LCAs and LLD areas. It should also be noted that all LCAs within the study area are likely to include some valued qualities or features, even if they do not form part of an LLD area.'</p> <p>c. The Local Landscape Designation Review clarifies in paragraph 2.28 – 2.30, that NDPs with valued landscape policies were evaluated as part of its assessment – for example: 'A number of communities within the study area have Neighbourhood Development Plans (NDPs). Some of these plans contain policies relating to valued landscapes and these were evaluated as part of this valued landscapes assessment...Neighbourhood plans may seek to designate further valued landscapes at a neighbourhood scale, which are not identified at the district scale of this assessment. NDPs could use similar criteria to those set out in this assessment to identify valued landscapes at a neighbourhood scale'.</p> <p>d. The process undertaken by the consultants followed best practice. Chapter 2 of the Local Landscape Designation Review (examination library reference NHL16) highlights the robust, up-to-date methodology and explains in detail how the review, completed in September 2024, was informed and shaped by the latest guidance, including the Landscape Institute's Technical Guidance Notes (see paragraphs 2.4 and 2.6 of NHL16). The review also involved Natural England as a</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>stakeholder (see Statement of Common Ground with Natural England – examination library reference DUC05).</p>
Policy NH6: Landscape	<ol style="list-style-type: none"> 1. Respondents raised potential duplication of policy requirements and suggested Policy NH6 could be merged with other landscape policies. 2. Concern that the policy requirements regarding visual integration into the landscape are subjective and exceed NPPF (2023) requirements. 	<ol style="list-style-type: none"> 1. We consider that it is appropriate for the districts to have a general policy on landscape, distinct from the district-valued landscapes Policy NH5. The policies do not cause duplication. Policy NH5 identifies the district-valued landscapes in South Oxfordshire and Vale of White Horse and highlights how development should have specific regard to these and to the Valued Landscapes Assessment; whereas Policy NH6 covers requirements related to landscape setting and character, the Visual Impact Assessments/Appraisals required and asks that development protects and, where possible, enhances, the features and functions contributing to the nature and quality of landscapes (including trees, irreplaceable habitats and waterscapes). 2. The policy positively aligns with and enhances the NPPF requirements. The policy requirements regarding visual integration into the landscape are justified via our Landscape Character Assessment (2024) and its detailed appendices and strategies regarding Landscape Character Types and Areas (examination library reference NHL04) and (examination library reference NHL04.14). The policy is proportionate, stating in criterion 1) 'proposals should be accompanied by a Landscape and Visual Impact Assessment or a Landscape and Visual Appraisal which is proportionate to the level of landscape sensitivity and scale of development'.
Policy NH7: Tranquillity	<ol style="list-style-type: none"> 1. Concerns regarding potential viability issues as a result of additional landscaping and construction costs, which respondents felt hadn't been accounted for in the Viability Assessment. 	<ol style="list-style-type: none"> 1. The Viability Report's Policies Matrix (Appendix 1) page 1 (examination library reference ITV04.1) describes how the viability consultants (Aspinall Verdi) 'incorporated the cumulative impact of the policies' into their Viability report calculations. This appendix describes how 'the matrix 'signposts' the reader to particular cost and values evidence which reads across into the financial appraisals...those policies with a direct impact on viability include

Policy	Key issues raised	Councils' response to key issues raised
	<p>2. Concern that the policy might restrict development and is subjective, which would be difficult to measure and consider as part of a planning application.</p> <p>3. The policy wording differs from national policy and guidance, citing the need to explicitly reference recreational and amenity value of tranquil areas.</p>	<p>policies such as affordable housing, minimum housing standards etc. that have a quantifiable impact on viability. These have been explicitly factored into our economic viability appraisals through cost and value assumptions etc'.</p> <p>Policy NH7 is accounted for in Appendix 1's matrix and viability assessments, where Aspinall Verdi note the policy's direct impact on viability and confirm, on page 128, that 'both districts have always benefitted from these areas. We assume that the cost of landscaping and mitigation is embedded into the BCIS construction costs (and therefore also external works) used herein'.</p> <p>2. Policy NH7 is positively prepared and not restrictive. The policy is evidence-led via the Tranquillity Assessment (examination library reference NHL15), which presents how development proposals could be considered in relation to their impacts on tranquillity, how development can incorporate features to reduce negative factors and identifies strategies that developments can put in place to protect, enhance and create tranquillity. Tranquillity impacts will vary by development type, scale and location, and it is important that the policy can be applied flexibly to all types of development.</p> <p>3. The policy sets out a positive, aspirational strategy for development to conserve and enhance tranquillity that aligns with national policy and guidance. The policy requirements provide a framework for decision-making that will be informed by consideration of the Tranquillity Assessment, which has specific regard to the recreational and amenity value of tranquil areas. We have justified the policy through the Tranquillity</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>4. Respondents raised concern that there was not enough detail in the policy on how the Tranquillity Assessment has been undertaken. The Equalities Impact Assessment was considered flawed because it only takes into account those with typical hearing.</p>	<p>Assessment and therefore do not consider it necessary to modify it.</p> <p>4. It would not be appropriate or relevant to explain within the Policy text, the details of how the Tranquillity Assessment was undertaken. Chapter 2 of the Tranquillity Assessment (examination library reference NHL15) explains how the assessment was undertaken. Both the Equalities Impact Assessment and Tranquillity Assessment followed a best practice approach. The tranquillity consultants followed best practice guidance, led by paragraph 191a of the NPPF, to identify and protect tranquil areas, and included workshops with key stakeholders seeking input and feedback into the methodology. The Tranquillity Assessment's methodology considered an appropriate range of indicators in the districts - and we do not consider the policy would adversely impact people that share protected characteristics.</p>
<p>Policy NH8: The historic environment</p>	<p>1. Concern about alignment with the NPPF (2023), particularly regarding the requirement for development to conserve and enhance significance.</p>	<p>1. Policy NH8 sets out a positive strategy for the conservation and enjoyment of the historic environment in accordance with national policy.</p>
<p>Policy NH9: Listed Buildings</p>	<p>1. Respondents raised potential duplication of policy requirements and suggested Policy NH9 could be merged with other heritage policies.</p> <p>2. Respondents suggested that if there are going to be separate policies they should be set out in the order of statutory hierarchy, to enable efficient decision making.</p>	<p>1. We consider it is appropriate to have a specific policy for those heritage assets which require specific protection by law.</p> <p>2. Our approach allows for a distinction to be made between different assets and their level of protection.</p>

Policy	Key issues raised	Councils' response to key issues raised
Policy NH10: Conservation Areas	<ol style="list-style-type: none"> 1. Concern about alignment with the NPPF (2023), particularly regarding part 1(g) and NPPF paragraphs 207 and 208, where the policy does not allow planning balance. 2. Respondents raised potential duplication of policy requirements and suggested Policy NH10 could be merged with other heritage policies. 3. Historic England raised concerns that the requirements are not clearly defined, and it is hard to countenance the 'complete loss' of significance of a conservation area, as implied might be possible in Part 3. 	<ol style="list-style-type: none"> 1. The policy should be read as a whole and will be applied at the decision taking stage in its entirety. Parts 3 and 4 of NH10 allows for planning balance in the event that substantial or less than substantial harm cannot be avoided in accordance with paragraph 207 and 208 of the NPPF. 2. We consider it is appropriate to have a specific policy for those heritage assets which require specific protection by law. 3. Part 3 of the policy is in accordance with paragraph 207 of the NPPF.
Policy NH11: Archaeology and Scheduled Monuments	<ol style="list-style-type: none"> 1. Concern about alignment with the NPPF (2023) and national policy, particularly regarding: <ol style="list-style-type: none"> a. Historic England raised concerns that the policy fails to respond positively to significance of the heritage and contribute toward repair, maintenance and enhancement of the asset. 	<ol style="list-style-type: none"> 1. NH11 is in accordance with national policy: <ol style="list-style-type: none"> a. Historic England's concerns were about scheduled monuments currently on the national Heritage at Risk Register, and they proposed for consideration adding a new criterion to address this. This is specific to (thankfully) just a few sites in the districts, and the councils are unsure of the appropriateness of a policy requirement responding specifically to scheduled monuments at risk, and of the practicalities of securing contributions (for example in cases where an impact was to the setting of the asset and the monument was outside the red line area of the planning application).

Policy	Key issues raised	Councils' response to key issues raised
	<ul style="list-style-type: none"> b. part 1 and NPPF paragraphs 207 and 208, where the policy does not allow planning balance. c. part 8, which respondents felt did not align with national policy <p>2. Concern that Part 9 is too specific and should apply via conditions at the planning application stage.</p>	<ul style="list-style-type: none"> b. The policy should be read as a whole; parts 6 and 7 of NH10 allow for planning balance in the event substantial or less than substantial harm cannot be avoided in accordance with paragraph 207 and 208 of the NPPF c. Our approach is consistent with both NPPF para 201 in seeking to avoid conflict between a proposal and a heritage asset's conservation and NPPF para 206 in allowing the planning balance to consider harm or loss and the significance of the heritage asset. <p>2. We consider it appropriate to provide the level of detail within the policy to ensure it is given sufficient weight in decision making.</p>
<p>Policy NH12: Historic Battlefields, Registered Parks and Gardens and Historic Landscapes</p>	<p><i>Please note this is a new entry – the Reg 22 statement appendix H (CSD10.1) repeated the contents of NH11 in error.</i></p> <ul style="list-style-type: none"> 1. Concern about alignment with the NPPF (2023), particularly regarding: <ul style="list-style-type: none"> a. The policy reference to conserve and enhance, goes beyond NPPF requirements b. Part 2 should be amended to be clear it refers to 'designated' heritage assets. 	<ul style="list-style-type: none"> 1. In respect of NPPF alignment: <ul style="list-style-type: none"> a. Policy NH12 sets out a positive strategy for the conservation and enjoyment of the historic environment in accordance with national policy. b. Any harm to or loss of significance of any heritage asset (designated or not), requires clear and convincing justification in order to make a balanced judgement regarding the scale of any harm or loss and the significance of the heritage asset.

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. Part 4 does not fully reflect the approach to the assessment to heritage assets as set out in the paragraph 208 regarding 'where appropriate, securing its optimum viable use'</p>	<p>c. When applying the planning balance and weighing harm against the public benefit, consideration will be given securing its optimum viable use, where appropriate. For completeness, we would be open to a modification to clarify this through adding at the end of NH12 Part 3 'Applicants must demonstrate that all other options for their conservation or use have been explored, including securing their optimum viable use.'</p>
<p>Policy NH13: Historic environment and climate change</p>	<ol style="list-style-type: none"> 1. Concern about alignment with the NPPF (2023), particularly regarding the policy reference to conserve <u>and</u> enhance, which goes beyond NPPF requirements. 2. Respondents felt Part 1 of the policy is too restrictive and inconsistent with the government's aspiration to increase renewable energy infrastructure both for generation and for storage. 3. Respondents felt the policy does not clearly express specific requirements or methodology. 	<ol style="list-style-type: none"> 1. The policy sets out a positive strategy for the conservation and enjoyment of the historic environment in accordance with national policy. 2. The policy is consistent with government strategy for the conservation and enjoyment of the historic environment. A policy cannot actively encourage harm to heritage assets given the legislative duty to conserve, so we do not consider the wording is too restrictive. The policy demonstrates a willingness to support proposals that have avoided or mitigated impact. 3. Applicants should have regard to advice prepared by Historic England, cited in footnote 103 and 104 of the Joint Local Plan.

Chapter 13: Infrastructure, transport, connectivity and communications

Policy	Key issues raised	Councils' response to key issues raised
<p>General comments on Chapter 13</p>	<ol style="list-style-type: none"> <li data-bbox="338 301 994 408">1. Some respondents stated that there is insufficient transport assessment to support the proposed transport policies. <li data-bbox="338 890 994 997">2. Some respondents also identified that there is a specific lack of public transport planning. 	<ol style="list-style-type: none"> <li data-bbox="1016 301 2125 850">1. The transport policies in Chapter 13 are based on a number of evidence documents and transport strategies covering our districts. Oxfordshire County Council's Local Transport and Connectivity Plan provided a strategic transport framework for the policy to work within, which itself was based on an extensive evidence base. Alongside this, we prepared three reports assessing the existing transport conditions (examination library reference ITV01), a study of active travel for the site allocations (examination library reference ITV02), and the transport modelling report (examination library reference ITV03). These reports re-assessed the transport mitigation measures and priorities in our current local plans, as well as identifying new ones. A Transport Assessment is a specific document that applicants submit alongside planning applications and contains more detail at a site-specific level than is necessary, and can be achieved for, in a local plan. We believe that our transport evidence is proportionate for Local Plan making. <li data-bbox="1016 890 2125 1364">2. Currently, private operators manage and operate public transport, while Oxfordshire County Council prepares bus and rail service strategies and administers concessionary bus passes. The district councils have little say in where and how the services run, while the location and quality of transport infrastructure dictates where services can operate. However, we provide Community Infrastructure Levy (CIL) and Section 106 contributions to Oxfordshire County Council for public transport, among other services and infrastructure. This enables them to work closely with the bus operators to improve public transport operation and infrastructure. For example, Section 106 funds can pump prime a new bus service, allowing the bus company to implement a new bus service to run at a frequency greater than the current passenger demand allows. This then demonstrates to new residents that the service is available and reliable.

Policy	Key issues raised	Councils' response to key issues raised
<p>Policy IN1: Infrastructure and service provision</p>	<ol style="list-style-type: none"> 1. Cumulative effect of policies in the plan make development unviable, e.g., infrastructure contributions. 2. Some respondents suggested that the policy should make a more explicit reference to the benefit of co-locating development and infrastructure. 3. Some respondents also raised specific concerns about sewage treatment work capacity, and the ability of this policy to secure appropriate mitigation for sewage treatment. 4. Some respondents considered that the policy should place greater emphasis on delivering health infrastructure. 5. Concerns about cross-boundary working on an important infrastructure project which can deliver housing and employment in/around Oxford, and South 	<ol style="list-style-type: none"> 1. We have conducted a robust viability assessment of the plan (examination library reference ITV04), which demonstrates the plan is viable. 2. The plan recognises the benefits of collocating development with infrastructure, with our spatial strategy (Policy SP1) focussing development in areas that are, or are planned to be, well served by infrastructure. 3. The Infrastructure Delivery Plan (IDP) (examination library reference CSD05.1) identifies that the residential-led development sites will need to make appropriate contributions toward sewage treatment capacity. There is different legislation that directs how developers and utility companies interact, and rights to connect (such as for sewage treatment). We don't believe it is appropriate or sound to replicate this in the Joint Local Plan. We have prepared a Water Cycle Study to support the plan and inform future planning applications, this explains to the new for sewerage treatment infrastructure. 4. The IDP identifies that the residential-led development sites will need to make appropriate contributions toward health infrastructure. We have discussed and agreed these contributions with the Buckinghamshire, Oxfordshire, and Berkshire West (BOB) Integrated Care Board (ICB) who are responsible for future health service planning in the area. Policy IN1 require future developments to address infrastructure requirement through considering the IDP when bring forward planning applications. 5. Relevant engagements have taken place to discuss transport and infrastructure matters throughout the development of the JLP, as set out in the Duty to Cooperate Statement (examination library reference CSD09). In our Statement of Common Ground with Oxford (examination library

Policy	Key issues raised	Councils' response to key issues raised
	<p>and Vale (the Cowley Branch Line).</p> <p>6. Respondents suggested there should be a policy that restricts development until infrastructure (e.g., wastewater treatment works) is funded and agreed.</p>	<p>reference LPA38), the City Council has confirmed that they have reflected on their representations on Cowley Branch Line, and accept that this is not a strategic matter. On the Cowley Branch Line specifically, our view is that there is currently insufficient justification to require contributions from our allocations, however, should that be forthcoming, the supporting text of the plan at paragraphs 8.34 and 8.42 and amendments made to the IDP as a result of meetings with Oxfordshire County Council and Oxford City Council allow for contributions to be directed to the Cowley Branch Line, as set out in our Written Statement WS2/1 in sections 2.22 and 2.23 (examination library reference WS2/1). Since we submitted the plan, the County Council has confirmed they no longer object to the JLP on this matter. Therefore, we do not consider this a soundness matter that requires a modification to the plan, as the plan is effective.</p> <p>6. Clause 2) of Policy IN1 requires infrastructure to be delivered to an agreed timetable. The councils therefore believe this policy appropriately addresses the matter around the timing of infrastructure delivery.</p>
Policy IN2: Sustainable transport and accessibility	<p>1. Concern was raised that there is:</p> <p>a. lack of evidence to support innovation in transport.</p>	<p>1.</p> <p>a. Clause 2h) of Policy IN2 encourages applicants for all major development proposals to explore innovative transport projects and new technologies to promote greater travel choice. The transport sector is one of the largest contributors to domestic emissions in the country, and so must reduce its contributions to ensure we can meet national and local targets for net zero carbon. Perpetuating the status quo will not enable the transport sector to make the required improvements. Science Vale, as a hub for innovation, is well placed to both develop and trial such innovations.</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>b. no plan to achieve modal shift.</p> <p>2. Some respondents questioned the suitability of travel choice in rural areas.</p>	<p>b. Modal shift to sustainable travel modes is a key part of Policy IN2 for all development. The policy sets out that development must have, or be able to provide, a 'choice' of transport modes (Policy IN2, clause 1b). Providing the infrastructure to allow people to travel a different way forms the first element. Following this, Travel Plans encourage and incentivize future residents and employees to choose more sustainable travel options (Policy IN2, clause 4).</p> <p>2. We acknowledge that the Joint Local Plan area comprises a considerable number of rural settlements, which often have limited access to walking and cycling infrastructure, as well as public transport. The Joint Local Plan recognises this and focusses new development in sustainable locations where public and active transport can be more easily delivered and sustained in the long term. Furthermore, Policy IN2 and the spatial strategy (alongside a range of other policies) actively discourage development where this cannot be achieved.</p>
<p>Policy IN3: Transport infrastructure and safeguarding</p>	<p>1. Respondents raised concerns about the policy, citing:</p> <p>a. the lack of strategic plans for the A34 and A4074.</p> <p>b. a lack of evidence in support of the plan</p>	<p>1.</p> <p>a. The A34 is a strategic highway that acts as a key corridor for Solent to Midlands road based traffic. This road is operated and managed by National Highways, thus the district has limited control over its strategic plan. Oxfordshire County Council operates and manages the A4074 and they are developing a study to identify possible changes to this route. The councils have worked closely with both National Highways and Oxfordshire County Council in developing policies and plans that affect these routes.</p> <p>b. We developed Policy IN3 based on a number of evidence documents and transport strategies covering our districts. Oxfordshire County</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>c. the absence of Cowley Branch Line and Third Thames Crossing for Reading in the JLP transport priorities.</p> <p>2. Some respondents considered that the inclusion of road schemes contradicted</p>	<p>Council's Local Transport and Connectivity Plan provided a strategic transport framework for the policy to work within, which itself was based on an extensive evidence base. Alongside this, we prepared three reports assessing the existing transport conditions (examination library reference ITV01), a study of active travel for the site allocations (examination library reference ITV02), and the transport modelling report (examination library reference ITV03). These reports re-assessed the transport mitigation measures and priorities in our current local plans, as well as identifying new ones. We believe that the transport evidence is proportionate for Local Plan making.</p> <p>c. Regarding the Cowley Branch Line, please see response to IN1 above (point 5). Policies AS3 (Land South of Grenoble Road, Edge of Oxford) and AS4 (Land at Northfield, Edge of Oxford) include supporting text that identify the potential re-opening of the branch line. Additionally, the Infrastructure Delivery Plan allows for 'any additional sustainable transport upgrades / enhancements (including for public transport, walking and cycling)' to be requested through the planning application stage. This will allow the council to seek contributions towards Cowley Branch Line, if justified when determining planning applications that are affected by the line. Regarding the Third Thames Crossing scheme (rebranded as Cross Thames Travel), this has been promoted for several years by some neighbouring authorities to the south-east such as Reading Borough Council. Oxfordshire County Council, as Highway Authority, does not support the proposal. We consider the crossing proposal would have significant adverse impacts on the local area, including environmental, congestion, and visual impacts.</p> <p>2. National and local policies, supported by significant industry and academic research, recognise the negative impact that additional road capacity can</p>

Policy	Key issues raised	Councils' response to key issues raised
	<p>with climate change objectives.</p> <p>3. Concern was raised about specific schemes, including the impact of the Southern Abingdon Movement Corridor.</p>	<p>have on both the number and length of journeys. Some road schemes can produce induced demand, through providing more and more road capacity which perpetuates more car travel, eventually filling the capacity created by the scheme. However, road construction can have positive changes for those not travelling by car through changing the nature of existing roads. Many of our roads were not originally designed and built for the type of traffic they now facilitate. For example, rerouting through traffic away from narrow roads that go through villages and urban areas can allow provision of wider pavements or even pedestrianisation to convert places for people not cars. Moving through traffic away from residential areas can improve quality of life from both reduced traffic noise and air pollution. Additionally, Oxfordshire County Council's policy (LTCP Policy 1 Transport user hierarchy) and Local Transport Note 1/20 now promotes road schemes that provide walking and cycling infrastructure, as well as considering bus priority improvements. This will mean that road changes also result in improvements for active and sustainable travel.</p> <p>3. In previous local plans, Oxfordshire County Council and the councils had safeguarded the Southern Abingdon Movement Corridor for a future bypass proposal to alleviate vehicle movements through Abingdon town centre. The JLP now safeguards land south of Abingdon to prevent development from obstructing a future movement corridor, which would seek to improve travel behaviours for all travel modes in a more holistic way for the Abingdon area.</p>
Policy IN4: Wilts & Berks Canal safeguarding	1. Wilts & Berks Canal Trust raised concern that the policy is weak and unclear on the nature of support to canal restoration from nearby development and therefore open to varied interpretation.	1. To develop this policy, we worked directly with the Wilts and Berks Canal Partnership, who promote the canal restoration alongside the Wilts and Berks Canal Trust. We shared the working draft policy with the trust and partnership on 7 August 2023 and again on 19 September 2023, and they raised no concerns. We believe that the submitted policy strongly supports the canal restoration, with width requirements for the waterway and

Policy	Key issues raised	Councils' response to key issues raised
		<p>towpath, as well as identifying where development must contribute to its restoration.</p> <p>Notwithstanding this, to avoid any doubt regarding the support for the canal's restoration, we would like to recommend a modification to the plan. This would be to include additional text in brackets to the final sentence of clause 4 of the policy, to read:</p> <p>'Development must support the delivery (<u>through financial contributions or direct delivery</u>) of the canal restoration where it adjoins the land safeguarded for the canal'.</p> <p>This revision goes beyond 'financial contributions', which is limited to just funding.</p>
Policy IN5: Cycle and car parking standards	1. County Council parking standards have not been through examination in public or the same level of scrutiny as a local plan, and some respondents did not feel they should be relied upon.	1. Oxfordshire County Council is the Highway Authority that operates and manages the county's road network (not including roads that are private or strategic routes managed by National Highways i.e. A34 and M40). As parking supply in retail, residential and employment locations influences how people travel on these roads, it is appropriate for Oxfordshire County Council to set parking standards. The current Oxfordshire-wide parking standards require different quantum of parking based on the location in Oxfordshire. They were adopted in December 2023 following a consultation period with the districts. Notwithstanding this, opportunities are available at the planning application stage to justify a departure of standards to address local context, where appropriate.
Policy IN6: Deliveries and freight	No key issues raised.	N/A

Policy	Key issues raised	Councils' response to key issues raised
Policy IN7: South East Strategic Reservoir Option (SESRO) safeguarding	<ol style="list-style-type: none"> 1. Several respondents questioned the need for the reservoir, and Thames Water's ability to demonstrate this need. 2. Some respondents questioned the extent of the safeguarding land, arguing that it covered too large an area. 	<ol style="list-style-type: none"> 1. The councils do not support the principle of the reservoir, and the policy is clear that the safeguarded land doesn't indicate such support. The councils have included this policy as Nationally Significant Infrastructure Projects (NSIPs) are determined under the Development Consent Order regime, and the policy is designed to both influence, and reflect the outcomes of, that process. 2. The JLP safeguards land that reflects the latest proposals from Thames Water.
Policy IN8: Digital connectivity	No key issues raised.	N/A

Chapter 14: Monitoring and review

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 14	No key issues raised.	N/A

Chapter 15: Local plan explainer

Policy	Key issues raised	Councils' response to key issues raised
General comments on Chapter 15	No key issues raised.	N/A

Joint Local Plan Appendices

Policy	Key issues raised	Councils' response to key issues raised
General comments on Appendix 1: Glossary	1. Some respondents disagreed with the definition for some terms provided in the glossary (e.g., Health Infrastructure Provision).	1. We have proposed modifications to names and definitions in Appendix 1 (Glossary) in our Schedule of Proposed Modifications for Submission (examination library reference CSD01.1) - this includes Health Infrastructure Provision.
General comments on Appendix 2: Strategic status of policies	No key issues raised.	N/A
General comments on Appendix 3: Status of previously adopted policies	1. Whilst the site promoter of Chalgrove Airfield raised concerns about the deletion of the site allocation, other respondents supported this.	1. Please see response to 'Chapter 8' key issues.
General comments on Appendix 4: Housing trajectory	1. No key issues were raised against this Appendix directly, but some respondents referenced the housing trajectory in comments against other parts of the plan, citing: <ul style="list-style-type: none"> a. no detailed information on site delivery. b. not enough information on housing trajectory to be able to provide 	1. We have provided a detailed breakdown of figures in the housing trajectory as follows: <ul style="list-style-type: none"> a. Appendix 3 of the housing Topic Paper (examination library reference TOP03.2) sets out a site-by-site breakdown of every site contributing within the plan period. b. Our latest housing trajectories are shown in our table of proposed modifications (modification number MM06, examination library

Policy	Key issues raised	Councils' response to key issues raised
	detailed comments.	<p>reference CSD01.1) (the housing trajectory). These detail the number of housing completions and the housing supply for each year of the plan period, against the housing requirement. The trajectory is shown in graph form, with figures provided in the table below the graph. This provides sufficient data on the housing trajectory. Furthermore, we publish detailed housing land supply statements that provide a thorough analysis of deliverability of sites, particularly those we expect to deliver housing in the next five year period (examination library references OCD08.1 (South Oxfordshire) and OCD09.1 (Vale of White Horse)).</p>
General comments on Appendix 5: Carried forward allocations from previous local plans	1. Some respondents queried the deliverability of the 'carried forward' allocations.	<p>1. There is one site within Appendix 5 (HOU2w - Land North of East Hanney – 80 homes) for which the councils will propose a modification to remove it from the housing supply (within both Appendix 5 and Policy HOU2). This site was included in Appendix 5 as the Vale of White Horse Planning Committee had resolved to grant planning permission, subject to a S106 agreement being signed, on 11 May 2022. However, the Vale of White Horse District Council is now treating this application as withdrawn as the housebuilder has confirmed they are unable to make further progress on the S106. This site would no longer conform with the spatial strategy in SP1. Removing HOU2w will require a consequential update to the figures in HOU2, reducing the total supply in the Vale of White Horse by 45 homes, from 19,599 to 19,554 (total supply taken from (modification number MM06, examination library reference CSD01.1). The JLP trajectory for the site is for 45 homes, derived from the now withdrawn planning application that had carried out a more detailed site capacity assessment. We are updating our housing trajectory and 5YHLS for the 2025/26 base year to show the latest information for all sites in our districts. Our annual site surveys and reporting allow us to gain a comprehensive understanding of the deliverability/developability of the sites across our districts.</p>

Policy	Key issues raised	Councils' response to key issues raised
		<p>For the avoidance of doubt, the above proposal to remove HOU2w - Land North of East Hanney from the housing supply would be a separate and additional modification to MM07 in the Schedule of Proposed Modifications for Submission (examination library reference CSD01.1). MM07 already proposes the removal of site HOU2f - North-East of East Hanney (50 homes) from Policy HOU2 because this site has now completed and does not need to be carried forward.</p>
<p>General comments on Appendix 6: Advisory note on seeking marketing and/or viability evidence from applicants</p>	<p>No key issues raised.</p>	<p>N/A</p>

Policies Map

Policy	Key issues raised	Councils' response to key issues raised
<p>Policies Map</p>	<p>1. Some respondents disagreed with the boundaries for certain aspects of the policies map (e.g., the Green Belt and site boundaries).</p>	<p>1. We have justified the site allocation policy and relevant site boundaries through the Site Selection Topic Paper (examination library reference TOP07.1), the Green Belt boundary through the Oxford Green Belt Study (examination library reference NHL01) and therefore do not consider it necessary to modify the plan.</p>

Key issues raised on other core submission documents

Document	Key issues raised	Councils' response to key issues raised
Sustainability Appraisal (SA)	<ol style="list-style-type: none"> 1. Some respondents queried the assessment of specific sites against the SA framework. 2. Some respondents did not think the SA had appropriately considered alternative options, including: <ol style="list-style-type: none"> a. alternative options for spatial strategy. b. economic growth. 	<ol style="list-style-type: none"> 1. Appendices H and I of the publication version Sustainability Appraisal (SA) (examination library reference CSD03) respectively provide a high-level summary and detailed SA of all the site allocations and reasonable alternatives. We have applied our professional judgement consistently when assessing each site against the sustainability objectives in the SA framework. 2. (a-b) We exercised evaluative judgment to arrive at options on which to base our robust assessment of 'reasonable alternatives' through Sustainability Appraisal. We identified an appropriate range of reasonable alternatives to our preferred spatial strategy, as well as alternative levels of housing and employment growth. We also applied a series of site selection parameters (broadly consistent with the high-level principles of our Spatial Strategy) to all the sites within the Housing and Economic Land Availability Assessment (HELAA) that had been identified as 'suitable in principle'. Of these, 43 shortlisted HELAA sites which were consistent with these parameters were taken forward as reasonable alternatives (for housing or employment development) to be subjected to SA. The detailed outcome of how each option or site performed against the SA objectives can be found in the Sustainability Appraisal and Appendices (Publication Version) (examination library reference CSD03). Summaries of these outcomes can also be found in paras 3.32 to 3.33 of the Spatial Strategy Topic Paper (examination library reference TOP08.2), paras 2.42 to 2.49 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) and paras 4.1 to 4.5 of the Employment Needs Topic Paper (examination library reference TOP02.2).

Document	Key issues raised	Councils' response to key issues raised
	<p>3. Some respondents were concerned the SA was undertaken late in the process and could not meaningfully inform the plan preparation process.</p>	<p>3. Sustainability Appraisal was not undertaken too late and fully informed our plan preparation. SA is an iterative process broken down into five distinct stages (as described in the Government's PPG). The second stage involves developing and refining alternatives and assessing effects, including:</p> <ul style="list-style-type: none"> • Development of the Local Plan options, including reasonable alternatives; and • Evaluation of the likely effects of the Local Plan and alternatives. <p>The SA process runs in parallel with Local Plan preparation and the second stage happens at around the same time as the Regulation 18 stage of plan making and prior to preparation of the publication version of the Local Plan. During public consultation on our Regulation 18(2) Preferred Options version of the JLP, several respondents expressed concern that the SA had failed to test sufficient reasonable alternatives to the proposed site allocations. To address these concerns, we applied a series of site selection parameters and shortlisted 43 additional housing and employment sites which were subjected to SA. The SA findings were then considered by officers in order to determine the individual sustainability merits of allocating each site in the Plan as an alternative to our preferred sites.</p> <p>The outcome of this assessment is described in paragraphs 2.42 to 2.49 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). The SA Report was updated at the Regulation 19 Publication stage to reflect the additional assessment work undertaken, with Appendices H and I respectively containing summary and detailed appraisals of the sites and alternatives (examination library reference CSD03).</p>

Document	Key issues raised	Councils' response to key issues raised
	<p>4. Oxford City Council raised that the SA Scoping Report omitted the assessment of the future state of the environment without implementation of the plan.</p>	<p>The SA appraised all 21 sites in the JLP that did not benefit from a form of planning permission at Regulation 19 stage. It also assessed the 43 alternative employment and housing sites, and one alternative site boundary for the land at Dalton Barracks. These assessments were therefore available during the publication period of the proposed submission plan.</p> <p>This process has ensured that the submission version of the plan has been properly informed by SA. Reasonable alternatives have been considered and the results of consultation on the SA have been taken into account. Following the stage 1 hearings, we have sought clarification as to whether the Inspectors require further assessment of 'carried forward' allocations and a response is awaited. We remain willing to carry out any further work which is required, noting that SA is iterative and that further work can take place during the examination, given that the legal requirement is for the assessment to be completed prior to adoption (examination library reference LPA26).</p> <p>4. In order to address the matter raised by Oxford City Council, we published an SA Technical Addendum for public consultation between 6 December 2024 and 17 January 2025 (examination library reference CSD03.1). This Addendum provides detail on how the 'baseline' environmental, social and economic conditions in South and Vale are likely to evolve in the absence of the Joint Local Plan, in relation to each of the topic areas set out in the original SA Scoping Report (e.g. air quality, biodiversity, water quality etc). All representations received have now been reviewed and published on the councils' websites.</p>
Habitats Regulations	<p>1. Natural England acknowledged receipt of the draft HRA report and reserved their position regarding the soundness and</p>	<p>1 – 3. We have explained how the HRA is required before the plan is given effect (i.e. adopted) in our response to the Main Issue 11 (examination library</p>

Document	Key issues raised	Councils' response to key issues raised
Assessment (HRA)	<p>legal compliance tests in relation to HRA prior to the end of the Regulation 19 publication period.</p> <p>2. Respondents raised concern that the HRA Appropriate Assessment was not published for Regulation 19.</p> <p>3. Respondents raised that it is unclear whether the JLP has been informed by an Appropriate Assessment to mitigate the previously identified significant effects on a number of European sites.</p>	<p>reference LPA11) and we have also summarised when and how the HRA for the Plan was carried out and reported under Q1.34 of the our Matter 1 Written Statement (examination library reference WS1/1).</p> <p>Following the stage 1 hearings, we have carried out air quality modelling and botanical site surveys at Cothill Fen, Oxford Meadows and Aston Rowant SACs. We are now preparing an HRA Appropriate Assessment Addendum, which will provide an updated screening assessment and Appropriate Assessment of atmospheric pollution effects on these 3 European Sites. Once complete, this Addendum will be submitted to the Examination and will be published for public consultation.</p>
Infrastructure Delivery Plan (IDP)	<p>1. Respondents raised concerns that they felt some information was missing from the IDP, citing:</p> <p>a. the costing of some schemes, which may impact viability.</p> <p>b. Watlington Relief Road.</p>	<p>1.</p> <p>a. We believe that the IDP appropriately reflects the known cost estimates to support the JLP. It is not possible for us to know all infrastructure projects, mitigation, and costs when we are preparing our local plan. This is because the allocations are strategic and will need to be worked up in detail through masterplans, and some of the infrastructure is not fully designed and costed. This is inevitable with long term masterplans and strategic allocations.</p> <p>b. The Watlington Relief Road is an important piece of local infrastructure that will help mitigate the impact of new housing development that already has planning permission in the village. These developments have provided contributions toward, or directly delivered parts of, the relief road. Oxfordshire County Council submitted a planning application for the relief road in December 2023, with amended plans submitted in October 2024 (available on the County Council's planning portal, application reference R3.0010/24). The relief road is at an</p>

Document	Key issues raised	Councils' response to key issues raised
	<p>c. Wantage and Grove Railway Station.</p> <p>d. Cowley Branch Line.</p> <p>e. energy, water and sewerage.</p>	<p>advanced stage of delivery, with parts of it already completed by developments in Watlington. Furthermore, none of the strategic allocations within the JLP rely upon, nor directly affect the Watlington Relief Road. We therefore believe the IDP should not include this infrastructure item.</p> <p>c. The councils' support the reopening of stopping passenger services at Wantage and Grove. However, this is a long-term project that is not necessary to mitigate the impact of the residential allocations surrounding Wantage and Grove.</p> <p>d. Policies AS3 (Land South of Grenoble Road) and AS4 (Land at Northfield) include supporting text that identify the potential re-opening of the Cowley Branch Line. Additionally, the IDP allows for 'any additional sustainable transport upgrades / enhancements (including for public transport, walking and cycling)' to be requested at the planning application stage. This will allow the council to seek contributions towards Cowley Branch Line, if justified, when determining planning applications that are affected by the line.</p> <p>e. The councils believe that, collectively, Policies CE8 (Water quality, waste water infrastructure and drainage) and IN1 (Infrastructure and service provision) provide an appropriate policy framework for delivering this type of infrastructure. Furthermore, the councils believe these matters are covered by other legislation (such as the Water Industry Act 1991), and so duplicating those requirements in the plan would not be appropriate.</p>
Local Development	1. Some respondents commented that the timescale for plan examination is overly	1. Please see our response to Main Issue 2 (examination library reference LPA11), where we explain that we consider there is sufficient time to examine this plan and maintain a 15-year plan period. Following the first

Document	Key issues raised	Councils' response to key issues raised
Scheme (LDS)	ambitious and unachievable, therefore the plan period should be extended.	stage of the hearings, the Inspectors asked the Councils to calculate the effect of changing the plan period on housing and employment numbers, which the Councils submitted (examination library reference LPA32).

Key issues on processes relating to the Joint Local Plan

Process	Key issues raised	Councils' response to key issues raised
Duty to Cooperate	<p>1. In relation to Oxfordshire, respondents raised:</p> <ul style="list-style-type: none"> a. concern that there isn't a Statement of Common Ground with other Oxfordshire authorities. b. concern that the JLP doesn't recognise that there is a single Oxfordshire housing market area. c. suggestions that a policy is needed establishing framework for future engagement with Oxfordshire partners. 	<p>1. In relation to Oxfordshire:</p> <ul style="list-style-type: none"> a. There is no legal requirement to have Statements of Common Ground (SOCG) at the Regulation 19 stage, these have followed at submission and examination stage. A Joint Oxfordshire SOCG for the JLP was signed by all five local authorities in Oxfordshire and submitted with the JLP in December 2024 (examination library reference DUC02). Further bilateral SOCG have been prepared with each Oxfordshire authority, three are completed and have been submitted (Oxfordshire County Council (examination library reference DUC06), Cherwell District Council (examination library reference LPA08) and West Oxfordshire District Council (examination library reference LPA09)), while one (with Oxford City Council) was concluded after the hearing sessions (examination library reference LPA38). b. The NPPF no longer recognises Housing Market Areas as the basis for calculating housing need. This has been the case since the standard method was introduced in July 2018. c. This proposal is not a typical local plan policy and is more like a desired protocol for engagement. Future engagement on any further issues locally is likely to be steered by the next strategic level plan in the area.

Process	Key issues raised	Councils' response to key issues raised
	<p>d. that there should be an Oxfordshire wide spatial plan.</p> <p>5. In relation to Oxford city, respondents raised:</p> <p>a. concern about Oxford unmet housing need and other strategic matters relating to Oxford.</p> <p>b. that the JLP defers the issue of new unmet need for Oxford therefore it doesn't effectively address this issue.</p> <p>c. that even if emerging unmet need for Oxford is disputed, it's for South and Vale to pursue the engagement on what those needs might be for the JLP.</p> <p>d. that Oxford have failed the Duty to Co-operate which must mean that South and Vale must have failed too.</p> <p>e. Oxford City Council claim to have not been directly engaged on relevant JLP matters and also disagree with the strategic matters identified by South and Vale.</p>	<p>d. This is not a soundness concern regarding the JLP. With local government reorganisation underway, there will in time be a new geography for development plans, and a new higher level spatial development strategy. These are matters for the future. Currently proposals for new unitary councils are being prepared locally. Legislation for spatial development strategies is in development through the Planning and Infrastructure Bill.</p> <p>5. In relation to Oxford City: (a-e) Please see the councils' response to Main Issue 1 (examination library reference LPA11) and Matter 2 Statement from South and Vale (examination library reference WS2/1). We have concluded a bilateral SOCG with Oxford City (examination library reference LPA38) which sets out a chronology of events and agreed legal principles applicable to the Duty to Co-operate. Our councils and Oxford City do not agree on whether the JLP gives rise to any 'strategic matters' that would be subject to the Duty to Co-operate (and consequently on the need for 'engagement' on such matters). In summary, we consider that the JLP's proposals on housing, including provision for Oxford's evidenced unmet need, and the JLP's employment provision, do not give rise to any significant impacts on the planning areas of both South/Vale and Oxford City, and that the concerns expressed by Oxford City on matters relating to the site allocations, the mix of housing, and the arrangements for affordable housing, are matters relating to the soundness tests concerning the effectiveness of, and the justification for, the JLP's policies. In any event, we consider that there has been on-going, constructive, and active engagement on all potential 'strategic matters' throughout the preparation of the JLP and in activities to support the preparation of the JLP.</p>

Process	Key issues raised	Councils' response to key issues raised
	<p>f. Cherwell District Council re-iterated the importance of sites which are needed to continue to meet Oxford unmet need.</p> <p>g. that the Duty to Co-operate should extend to working together to continue to protect views, the city's green setting and established view cones.</p> <p>6. There are claims that the councils are unable to demonstrate that they have engaged appropriately on Reading's unmet housing needs.</p>	<p>f. We acknowledge the importance of sufficient supply to meet the Oxford unmet need and the JLP positively responds to this with sites and supply to ensure we can continue to deliver for Oxford's need close to the city.</p> <p>g. We agree with the need to ensure adequate protection of views, green setting, and view cones, but the duty itself doesn't need to be extended. The potential strategic matters for discussion included 'Conserving and enhancing our natural and historic environments' (see examination library reference CSD09.1) so this issue has been within the scope of matters to discuss. We have continued to discuss this matter with Oxford, especially the site-specific issues of view cones at the carried forward allocation sites, particularly at the previously allocated site impacted by this issue at Bayswater Brook. We engaged with Oxford about this during the planning application process. We have policy provision on the setting and views of Oxford through the JLP's Green Belt policies, Policies NH6 (Landscape) Part 3, and Policy AS5 (Land at Bayswater Brook, Edge of Oxford), please see the councils' response to key issues on Chapter 12 (general comments).</p> <p>6. In relation to Reading, there are no strategic matters which significantly impact both our areas for the JLP to resolve. The adopted Reading Local Plan has no requirement for South or Vale to meet unmet need for Reading. Reading Borough Council's emerging Local Plan has not generated any requirements for active resolution through the JLP either. The engagement that has taken place to discuss housing need issues across the authority boundaries are evidenced to be constructive and active as demonstrated by the conclusions in the Statement of Common Ground with Reading (examination library reference DUC07) and summarised in the Statement of Compliance with the Duty to Cooperate at page 18 (examination library reference CSD09.1).</p>

Process	Key issues raised	Councils' response to key issues raised
	<p>7. There are claims that the councils are unable to demonstrate that they engaged with Oxfordshire County Council, Swindon Borough Council, Reading Borough Council or Wokingham District Council as Local Highways and Transport Authorities, or National Highways in respect of strategic matters regarding transport infrastructure, services and connectivity.</p> <p>8. It was suggested that other local plans close-by will need to consider a higher housing need from the new Standard Method calculations, therefore the JLP should wait to see if those local plans will have housing needs which could be accommodated in South and Vale.</p> <p>9. Concern generally that there is an absence of Statements of Common Ground with the Regulation 19 JLP, and this must mean the Duty isn't complied with.</p> <p>10. Concern that parish councils are not informed of the outcomes of districts meetings.</p>	<p>7. There are no strategic matters related to transport infrastructure, services and connectivity which significantly impact two or more areas for the JLP to resolve. Relevant engagements have taken place to discuss transport and infrastructure matters, these have been constructive and active as demonstrated by various SOCG (examination library references DUC02 - DUC09) and are reported in the Statement of Compliance with the Duty to Cooperate and summarised for each relevant area surrounding our districts (examination library reference CSD09.1).</p> <p>8. There are currently no adopted or emerging local plans in Oxfordshire with unresolved or new unmet housing need for the JLP to consider. Any requests for the provision of unmet need from other local planning authorities will be considered if and when requested.</p> <p>9. Please see the response to point 1a above. There are Statements of Common Ground with all the Oxfordshire authorities and with neighbours Reading, Swindon, Wokingham, Wiltshire (examination library references DUC02, DUC06, LPA08, LPA09, DUC07, DUC08, DUC09 and LPA10 respectively).</p> <p>10. This is not a requirement of the Duty to Co-operate. However, parish councils can access this material in the Statement of Compliance with the Duty to Co-operate (examination library reference CSD09.1) and its earlier versions (examination library references CSD08 and CSD09). Throughout the Joint Local Plan process, we have continued to keep parish councils informed through various communication methods such as press releases,</p>

Process	Key issues raised	Councils' response to key issues raised
	<p>11. Concern that there are unresolved issues and a lack of engagement with all neighbouring authorities referenced.</p> <p>12. Concern that the DTC statement itself doesn't explain how issues have been effectively resolved or concluded.</p> <p>13. Concern that there are major strategic cross-boundary issues relating to transport and mobility that require proper engagement which hasn't taken place.</p>	<p>town and parish newsletters (Vale NEWS / South NEWS) and email notifications. Examples of some of the communication methods we have used are within our Regulation 22 Statement (examination library reference CSD10).</p> <p>11. There are no unresolved Duty to Co-operate issues that the JLP is required to resolve. The Statement of Compliance with the Duty to Co-operate (examination library reference CSD09.1) provides an authority-by-authority narrative to explain the engagement and resolution at the point of submission. More information about each engagement and its resolutions are included in the Response to the Initial Questions (examination library reference LPA02) and its Appendix 1 Table of Engagement (examination library reference LPA02.1), column iv.</p> <p>12. Please see response to key issue 8 above.</p> <p>13. There are no unresolved Duty to Co-operate issues on transport and mobility, please see response to key issue 4 above.</p>
Legal Compliance	<p>1. Some respondents raised concern stating they felt the plan was not legally compliant, citing:</p> <p>a. the plan is not consistent with national policy.</p>	<p>1. We consider the JLP is legally compliant:</p> <p>a. The plan is consistent with national policy, please see our responses to the Main Issues (examination library reference LPA11) and key issues by policy (in this document) for further details.</p>

Process	Key issues raised	Councils' response to key issues raised
	<ul style="list-style-type: none"> b. the updated Local Development Scheme and timescales for submission, noting the potential implications associated with the emerging NPPF. c. the consultation process, which they felt did not align with the requirements of the Statement of Community Involvement. d. the lack of HRA Appropriate Assessment and/or challenges of the Sustainability Appraisal process. e. the council has not met their Duty to Cooperate requirements. 	<ul style="list-style-type: none"> b. Please see our responses to Main Issues 2 and 13 (examination library reference LPA11). c. We are satisfied that the Joint Local Plan 2041 has been prepared and submitted in compliance with the Joint Statement of Community Involvement (SCI) (examination library reference OCD02). Please see our response to the Inspectors' Initial Questions (examination library reference LPA02, response to IQ36 on page 45, for more details). d. Please see our responses to Main Issues 11 (HRA) and 10 (SA) (examination library reference LPA11). e. Please see our response to Main Issue 1 (examination library reference LPA11), and our Written Statements for Matters 1 and 2 (examination library references WS1/1 and WS2/1).
HELAA	<ul style="list-style-type: none"> 1. Many developers and site promoters provided promotions of alternative and/or additional sites for allocation. 2. Some respondents disagreed with the assessment and/or summaries of their sites and suggested amendments. 3. Some respondent commented that some HELAA assessments from January 2024 	<ul style="list-style-type: none"> 1. We have recorded new sites not already entered into our HELAA database and will include them in a future iteration of our HELAA report. 2. Where respondents have highlighted inaccuracies in their site's proforma or reported any changes in circumstances (e.g. new site ownership, different site area etc), we have amended our HELAA database and associated mapping. These changes will also be reflected in a future iteration of our HELAA report and map. 3. The October 2024 HELAA report (examination library reference HES21.4) explains at paragraphs 44-47 that we took a revised approach to including

Process	Key issues raised	Councils' response to key issues raised
	<p>differed from the latest version, with no explanation why.</p> <p>4. Oxford City Council stated that for some site allocations the housing numbers in the allocation policies differ with the HELAA's capacity assessment. They also stated that the HELAA identifies indicative 'lead in times' with no explanation about when this is counted from, and that the assessment of delivery times is not appropriate where site-specific information is known.</p> <p>5. Some respondents raised concerns about a lack of engagement with site promoters.</p>	<p>agricultural land as a development constraint under Step 2 of the assessment. This change to the methodology resulted in changes to the conclusions for some sites. The HELAA report and the site proformas provide an overview of the assessment process, but we have extensive databases which contain the detail that sits behind these. Between January and October 2024 we updated the databases in various circumstances (for example, where a developer provided an update on site size, land ownership etc, where new sites had been submitted for assessment, or where other factors came to light which meant that the conclusion for a particular site needed to be updated). The October 2024 HELAA report and appendices therefore supersede the earlier January 2024 versions.</p> <p>4. The HELAA uses a generic formula to calculate maximum indicative capacity of each site which makes it past Steps 1 and 2 of the assessment (i.e. has no absolute constraints and meets the suitability criteria set out in the methodology). We recognise that net developable areas are likely to be different, when site specific constraints and requirements are taken into account. A more detailed assessment of capacity has been undertaken for all sites allocated in the JLP, so the housing numbers within the policies themselves should be taken as accurate. Similarly, any site trajectory information provided in the HELAA is only indicative and is superseded by specific site delivery information cited in the JLP itself.</p> <p>5. We invited landowners, agents, developers, community groups and others who were interested in having land considered for development in the JLP, to submit information to us on the sites they wanted to be assessed. This exercise was known as the 'call for land and buildings available for change' and ran from 19 August to 30 September 2021. Whilst the submission window formally closed on 30 September 2021, we continued to accept new submissions. The sites submitted through this process</p>

Process	Key issues raised	Councils' response to key issues raised
	<p>6. Some commented that there is no trajectory, though two HELAA documents indicated there would be, to suggest when and how sites will deliver new housing.</p> <p>7. Respondents raised concerns that the HELAA overstated sites' capacities, leading to the risk that the total housing supply may not meet actual needs.</p> <p>8. Many respondents commented on the site selection process, citing that:</p> <ul style="list-style-type: none"> a. many sites should have been considered further. b. there were concerns with the relationship between the HELAA, SA 	<p>formed the basis for developing the HELAA, alongside other sites submitted to us through an earlier 'call for sites' conducted in the Vale of White Horse, and as part of the Oxfordshire Plan.</p> <p>6. For all sites that made it through the Step 1 and Step 2 assessments, we included an indicative site trajectory in the respective proforma at Appendix A to the HELAA report (examination library reference HES21.5) As explained above, indicative trajectories are superseded by any site-specific delivery information cited in the JLP. The Plan also includes district-wide housing trajectories from 2021 to 2041 at Appendix 4.</p> <p>7. As explained in (4) above, the HELAA uses a generic formula to calculate maximum indicative capacity of each site which makes it past Steps 1 and 2. We recognise that net developable areas are likely to be different, when site specific constraints and requirements are taken into account, and that there may be cases where a site's capacity has been over-estimated. However, the HELAA does not allocate sites or grant planning permission, it only identifies sites that may have development potential. The HELAA does not take into account how much development is needed but provides a high-level assessment of how much land could be expected to come forward for development, the type and size of development that could come forward, and when it could come forward. Many more sites have been assessed in the HELAA than will need to be allocated for development over the Joint Local Plan period.</p> <p>8. (a-c) During our preferred options (Regulation 18 Part 2) consultation, many respondents suggested we needed to assess more sites from the HELAA as 'reasonable alternatives' to our site allocations. We therefore developed a series of site selection parameters to identify sites from the HELAA for further investigation and testing. This led to us testing an additional 43 sites (for housing or employment uses) against our</p>

Process	Key issues raised	Councils' response to key issues raised
	<p>process and the Site Selection Topic Paper.</p> <p>c. alternative sites had been discounted arbitrarily between the HELAA and site selection processes.</p>	<p>Sustainability Appraisal (SA) framework. You can find more information about this process, and how we used the HELAA to inform the final suite of sites in the Joint Local Plan in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1)</p>

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