



Planning Inspectorate

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

Inspectors' Matters, Issues and Questions for Examination

Part 3 [ID29]

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Introduction

These matters, issues and questions (MIQs) relate to the third stage of hearings, following Stage 1 in June 2025, and Stage 2 which took place in July 2026 with a contingency session held on 9 September 2026.

This document contains the MIQs for the third part of hearings and it is accompanied by an Inspectors' Guidance Note [ID30].

The following MIQs will help us decide if the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is. Not all of the Plan's policies are covered by specific questions. This is because considerable ground has already been covered in earlier phases of the examination. Moreover, we are only able to recommend main modifications to the Plan where we consider them to be necessary for soundness. Accordingly, in some cases written material already received may have persuaded us that individual policies do not need to be tested further by way of specific soundness questions.

The provisional hearing programme setting out individual sessions and participants is set out in a separate document [ID31].

Where relevant, we refer to the further work undertaken since earlier parts of the Examination in the MIQs – and where we do so this will be appropriately referenced to material that is available on the examination website.

Where we refer to the National Planning Policy Framework (NPPF) it is the December 2023 version. Similarly, any reference to Planning Practice Guidance (PPG) and Planning Policy for Traveller Sites (PPTS), will be to the version relevant to the December 2023 NPPF.

We also draw participants' attention to the [Minister of Housing and Planning's Letter to the Planning Inspectorate of 9 October 2025](#). This sets out his expectations on the 'flexibilities' that Inspectors are expected to apply in examinations relating to the last plans to be brought forward in the legacy system prior to the closing date for submissions in December 2026, such as the one subject to the current examination. According to the October Letter it "is therefore critical that Inspectors approach examinations of current system plans with the appropriate degree of flexibility. The evidencing of expectations to establish whether the legal and soundness tests have been met should be proportionate to the context in which plans in the existing system are being prepared."

Where the Councils feel that material they have previously submitted answers a question posed, they should make references to any relevant documents in the examination library as appropriate.

MATTER 6¹ – SITE SELECTION AND CARRIED FORWARD ALLOCATIONS

Issue (i) – Is the Plan informed by a robust approach to site selection?

Q6.1.1 Does the Councils' approach to land availability assessment provide a clear understanding of the land available in the area, and is it a justified basis for the site selection process?

Q6.1.2 Does the approach to site selection set out in the Councils' 'Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper' provide a justified basis for the sites allocated by the Plan?

Issue (ii) – Is the Plan's approach to carried forward allocations legally compliant, justified, and clearly written and unambiguous so that it is evident how a decision-maker should react to development proposals on such sites?

Q6.2.1 Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) requires that where a local plan contains a policy that is intended to supersede another policy in the adopted development plan that it must state that fact and identify the superseded policy. Is the Plan's approach to 'carried forward' allocations consistent with Regulation 8(5)?

Q6.2.2 Is the Plan clear and unambiguous in relation to the status of 'carried forward' allocations so that it is evident how a decision maker should react to development proposals relating to them (NPPF paragraph 16(d))?

Q6.2.3 A number of sites identified in the Plan have planning permission, some have construction ongoing, and development has completed on others – does it remain justified to include policies relating to these specific sites in the Plan?

MATTER 7 – SITE ALLOCATIONS, GARDEN VILLAGES AND CARRIED FORWARD ALLOCATIONS

Issue - Whether the Plan's allocations and garden villages are justified, and whether the Plan's policies effectively guide their development in a clear and unambiguous way?

Policy LS1

Q7.1.1 Does Policy LS1 provide a justified and effective framework for the consideration of large-scale major development proposals which is consistent with

¹ Matters 1-5 were the subject of previous hearing stages

national policy? Is it evident how a decision maker should react to development proposals?

NB In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations, for example in terms of adverse impacts, delivery and so on.

Taking each of the proposed sites individually:

Q7.2.1 What is the background to the site allocation? How was it identified and which options were considered?

Q7.2.2 Is the site area, boundary and capacity assumption justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Q7.2.3 How have the mix of uses been determined?

Q7.2.4 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, pollution, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would the policy safeguards and proposed mitigation be sufficiently effective?

Q7.2.5 Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Q7.2.6 What effect will the allocations have on the highway network(s)? Where necessary, is it clear to decision-takers, developers, and local communities what the necessary highway improvements consist of, who will be responsible for delivering them and when?

Q7.2.7 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Q7.2.8 What is the situation in relation to land ownership and developer interest?

Q7.2.9 How is it intended to bring the site forward for development?

Q7.2.10 Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Q7.2.11 What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Q7.2.12 Is the expected timescale and rate of development realistic?

Q7.2.13 Are the policy requirements justified, effective and consistent with national policy?

Q7.2.14 Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Q7.2.15 Are any modifications necessary in the interests of soundness?

Site Specific Questions

Policy AS1/AS13 Land at Berinsfield Garden Village

Q7.3.1 How will it be ensured that new development integrates with the existing settlement of Berinsfield and that development contributes to the regeneration of the settlement?

Q7.3.2 Does Policy AS13 provide a clear and unambiguous basis for decision making?

Policy AS5 Land at Bayswater Brook, Edge of Oxford

Q7.3.3 Are the policy's requirements relating to Wick Farm Wellhouse justified and effective and would it be clear to a decision-taker how to react to proposals coming forward in relation to this element of the site? What, if any, mechanisms would be used to agree a schedule of works for the Wellhouse outside of the listed building consent process?

Policy AS7 Didcot Gateway

Q7.3.4 Is the Policy's requirement for protection *and* enhancement of existing priority habitats consistent with national policy and/or otherwise justified?

Policy AS10/Policy AS14 Land at Dalton Barracks Garden Village/ Dalton Barracks Garden Village

Q7.3.5 Are the implications of the site's proximity to protected habitats sites and related designations effectively reflected in the policies and do they provide a justified basis for consideration of this issue?

Q7.3.6 Is it clear what and whether any aspects of the Plan 'supersede' the Dalton Barracks Supplementary Planning Document (per paragraph 8.107 of the Plan)?

Q7.3.7 Does Policy AS14 provide a clear and unambiguous basis for decision-making in relation to land within the Garden Village, but outside of site allocation AS10?

Policy AS9 North West of Valley Park, Didcot

Q7.3.8 Is the Policy justified insofar as its design aspects are concerned and does it provide an effective basis for consideration of the relationship between the development of the site and adjacent allocations?

Policy AS12 Harwell Campus

Q7.3.9 Are the requirements for production of a masterplan justified?

Q7.3.10 Is it clear when consultation with the Nuclear Decommissioning Authority and Nuclear Restoration Services should take place and which developments this requirement would relate to?

Q7.3.11 Does the policy and its reasoned justification provide an effective and clear basis for the consideration of developments relating to nuclear decommissioning and restoration?

Policy AS15 Harcourt Hill Campus

Q7.3.12 Are the requirements for the production of a masterplan justified?

MATTER 8 – HOUSING SUPPLY

ISSUE – Does the Plan identify a sufficient supply and mix of housing sites (Policy HOU2)

Q8.1.1 Does the Plan identify a supply of specific, deliverable sites for five years following the anticipated date of adoption (NPPF paragraph 69(a))?

Q8.1.2 Does the Plan identify a supply of specific, developable sites or broad locations for growth for the remaining years of the Plan period (NPPF paragraph 69(b))?

Q8.1.3 What is the estimated supply from each of the following sources:

- a) Completions since 2025;
- b) Sites with detailed planning permission for 10 or more dwellings;
- c) Sites with outline or detailed planning permission for 9 or less dwellings (small sites);
- d) Windfall allowance
- e) Other sites with outline planning permission for 10 or more dwellings;
- f) Site allocations;
- g) Sites on the brownfield register;
- h) Other sources not included in a-g above.

- Q8.1.4 What evidence is there to support these estimates and are they justified?
- Q8.1.5 What is the estimated total supply of deliverable and developable new housing during the Plan period 2025-2043?
- Q8.1.6 Does the anticipated rate of delivery take into account the policy requirements of the Plan, including matters that are expected to be addressed prior to completion of developments?
- Q8.1.7 Is there compelling evidence that windfalls will provide a reliable source of supply in line with the allowance anticipated by the Plan (NPPF paragraph 72)? In particular how have the implications of the Plan's policies (including its settlement hierarchy) informed an appreciation of expected future trends?
- Q8.1.8 Does the Plan support the development of windfall sites and give great weight to the benefits of using suitable sites within existing settlements for homes (NPPF paragraph 70(d))?
- Q8.1.9 Is the expected rate of delivery accurately reflected in the Plan's Housing Trajectory (Appendix 4) (NPPF paragraph 75)? What assumptions have been made about the scale and timing of supply and annual rates of delivery for sources of supply set out in the housing trajectory?
- Q8.1.10 Would it be appropriate for the Plan to set out the anticipated rate of development for specific sites (NPPF paragraph 75)?
- Q8.1.11 Does the development plan (taken as a whole – including made neighbourhood plans) and brownfield registers identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare? If not are there strong reasons why this 10% target cannot be achieved? (NPPF paragraph 70(a))?

MATTER 9 – HOUSING POLICIES

ISSUE (i) Whether Policy HOU3 provides a positive, justified and effective framework for the provision of affordable housing?

Policy HOU3

- Q9.1.1 Taken together do the Joint Housing Needs Assessment (JHNA) and Viability Study provide a justified basis for Policy HOU3?
- Q9.1.2 Does the evidence support the proposed affordable housing targets as a proportion of new homes of 50% in South Oxfordshire and 40% in the Vale of White Horse respectively?

Q9.1.3 Would Policy HOU3 be deliverable over the Plan period, if not what adjustments might be needed to ensure that it is?

Q9.1.4 Are the thresholds for developments that would give rise to affordable housing contributions set out in Policy HOU3 1(a) and (b) justified and consistent with national policy?

Q9.1.5 Is the proposed tenure mix set out in Policy HOU3 2 justified?

Q9.1.6 Are Policy HOU3's requirements for affordable housing contributions from specialist older person's housing and build to rent properties justified and consistent with national policy? Is the proposed tenure mix set out at HOU3 3 justified?

Q.9.1.7 Are Policy HOU3's requirements relating to first homes consistent with national policy and guidance set out in the 'First Homes' PPG, in particular that a minimum of 25% of all affordable housing units delivered through developer contributions should be of this type?

Q9.1.8 Is the Policy's 15 dwelling limit to the size of any affordable housing cluster justified (HOU10(c))?

Q9.1.9 Is Policy HOU3(12) justified, effective and would it be clear and unambiguous to a decision-maker how to react to this aspect of the policy?

ISSUE (ii) Whether Policy HOU4 provides a positive, justified and effective framework for the consideration of house mix and size within new developments?

Policy HOU4

Q9.2.1 Does the JHNA provide a justified basis for the type and mix of dwellings required by Policy HOU4?

Q9.2.2 Is the Policy's requirement for "all proposals for C3 homes" (HOU4(1)) (including conversions and subdivisions (HOU4(9))) to provide the bedroom mixes set out in the tables justified and effective?

Q9.2.3 Is the incorporation of the nationally described space standard (NDSS) consistent with national policy and the 'Housing: optional technical standards' PPG (Paragraph: 020 Reference ID: 56-020-20150327 Revision date: 27 03 2015) in terms of need for, viability and timing of their implementation? Is the range of housing types that the NDSS would apply to justified?

Q9.2.4 Is the approach to accessible homes set out at HOU3 (3-7) justified, effective and consistent with national policy?

Q9.2.5 Is the requirement for major residential development to include contributions to specialist housing for social care (HOU4(8)) justified, effective and consistent with national policy?

Policy HOU14

Q9.2.6 Is the approach to Build to Rent schemes justified, effective and consistent with national policy?

ISSUE (iii) Whether Policy HOU5 provides a positive, justified and effective framework for the provision of housing for older people?

Policy HOU5

Q9.3.1 Are the requirements to provide at least 60 housing with care units for proposals of 500 homes or more, and the site-specific requirements (HOU5 (1)) supported by the evidence in the JHNA? Is the threshold of 500 homes justified and effective?

Q9.3.2 Is the requirement to design at least 5% of homes as housing with support for older people (HOU5 3 a, b) supported by the evidence in the JHNA? Is the threshold of 10 or more dwellings justified and effective?

Q9.3.3 Is the approach to proposals for specialist housing for older people justified, effective and consistent with national policy (HOU5 5 a-e, 6)?

ISSUE (iv) Whether Policies HOU6 and HOU7 provide a positive, justified and effective framework for the provision of self-build and custom build housing?

Policy HOU6/Policy HOU7

Q9.4.1 Is the requirement for large scale major residential developments to provide 5% of the residential units as serviced plots for self-build and custom build (HOU6 4) justified by the evidence, effective and consistent with national policy?

Q9.4.2 Is the requirement for major self-build and custom housing schemes (HOU6 3; HOU7) to provide affordable housing justified?

Q9.4.3 Is the approach to the consideration of affordable housing as part of self-build and/or custom build housing schemes justified, effective and consistent with national policy (HOU7)?

ISSUE (v) Is the approach to residential development in the countryside and rural areas justified, effective and consistent with national policy?

Policies HOU8; HOU12; HOU13; HOU17

Q9.5.1 Do policies HOU8, HOU12, HOU13; HOU17 collectively provide a justified and effective framework for the consideration of residential development in the countryside and rural areas which is consistent with national policy?

ISSUE (vi) Is the approach to the adaptation and intensification of the existing dwelling stock justified, effective and consistent with national policy?

Policies HOU9; HOU15; and HOU16

Q9.6.1 Do policies HOU9, HOU15 and HOU16 collectively provide a justified and effective framework for the intensification and adaptation of the existing dwelling stock which is consistent with national policy?

ISSUE (vii) Is the approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople positive, justified, effective and consistent with national policy?

Policies HOU10 and HOU11

Q9.7.1 Does the Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment 2024 Executive Summary for South Oxfordshire and Vale of White Horse (GTAA ES) (HES13.1) and the Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA) (LPA01) provide a justified basis for the assessment of need for Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation in the respective Districts?

Q9.7.2 Were any technical issues or concerns regarding the methodology encountered during the preparation of the GTAA and if so, what were these and how were they resolved?

Q9.7.3 What do the alternative needs scenarios set out at page 9 of the GTAA ES show? How do these compare to the preferred scenario?

Q9.7.4 Does the GTAA take account of the needs of those who have ceased to travel permanently, and are its definitions of Gypsy, Traveller and Travelling Showperson consistent with those of the PPTS?

Q9.7.5 What was the response rate to the survey? Does this provide a sufficiently robust statistical basis for assessing need?

Q9.7.6 How were the needs of unknown households and transit provision considered?

Q9.7.7 How many pitches/plots would the sources of supply set out at Policy HOU10 (1 a-c) provide?

Q9.7.8 Will the sources of supply set out at Policy HOU10 (1 a-d) meet the identified requirement for the Plan period in full?

Q9.7.9 Will the sources of supply set out at Policy HOU10 (1 a-d) provide a sufficient supply of sites to meet the five-year requirement?

Q9.7.10 Do Policies HOU10 (2) and HOU11 provide an effective basis for the consideration of sites for Gypsies, Travellers and Travelling Showpeople and for the protection of existing such sites?

Q9.7.11 Are suggested Main Modifications MM08 and MM09 (CSD01.1) necessary for soundness?

MATTER 10 – CLIMATE CHANGE

Issue (i) – Whether the Plan’s policies on energy efficiency and ventilation are consistent with national policy, effective and justified?

Q10.1.1 Is the Plan’s approach to energy efficiency and embodied carbon justified in the context of national policy on this matter as set out in the NPPF and the ‘Planning - Local Energy Efficiency Standards Update’ WMS of 13 December 2023 and other relevant considerations?

Q10.1.2 Is the Plan’s approach to overheating and ventilation justified in the context of the ‘Housing Update’ WMS of 15 December 2021, the NPPF and any other relevant considerations?

Policy CE1

Q10.1.3 Is it clear how proposals would demonstrate that they seek to limit greenhouse gas emissions (per Policy CE11)?

Q10.1.4 Is the application of Policy CE1 2 *all* new development (no matter what scale or type), (including its requirement for the submission of a Sustainable Design and Construction Checklist) justified and effective?

Q10.1.5 Is it clear when the overheating assessments required by Policy CE1(2)(c) are required? Are the requirements justified? And is Policy CE1 2c (ii)’s requirement for adherence to an (as yet unknown) “future equivalent standard” justified?

Q10.1.6 Is the policy clear insofar as single aspect developments are concerned so that it is evident how a decision maker should react to proposals for them?

Policy CE2

Q10.1.7 Policy CE2 applies to all developments regardless of scale or nature. Is this a justified and effective approach to this matter?

Q10.1.8 Are the Policy's requirements relating to information to be supplied in relation to proposals justified, and is it clear when the information needs to be provided (for example, at application, pre-commencement, post occupation etc)?

Q.10.1.9 How would the restrictions on connection to the gas grid or fossil fuel heating systems be controlled through the planning system, and is the Policy effective in this sense?

Q10.1.10 What soundness deficiency does suggested modification MM02 (CSD01.1) seek to address and would it be effective in doing so?

Policy CE3

Q10.1.11 Is it clear what scale and type of development the Policy applies to?

Q.10.1.12 Is it clear how proposals are expected to demonstrate that design decisions have been made to minimise the amount of material needed?

Q10.1.13 Are the information requirements set out in the Policy justified?

Q10.1.14 Is the prioritisation of re-use, retention and retrofit of existing buildings intended to apply to all development proposals or only those involving demolition/re-use of previously developed land? And is the Policy consistent with the national policy on making effective use of land (see section 11 of the NPPF)? Is this aspect of the Policy internally consistent with paragraph 4.28 of the reasoned justification?

Q.10.1.15 Are the targets in criterion (3), and the carbon offsetting arrangements in criterion (4) justified and would the Policy be effective in securing these? Is the approach consistent with Policy CE2?

Policy CE4

Q.10.1.16 Is the Policy's requirement for a pre-development audit justified, and do the requirements of criterion 4 unnecessarily repeat those of Policy CE3?

Issue (ii) Whether Policy CE5 is consistent with national policy, effective and justified?

Q10.2.1 Does the Plan provide a positive strategy for energy from renewable and low carbon energy sources in a manner consistent with the NPPF?

Q.10.2.2 Are the areas identified by the Plan in relation to energy generation and storage justified and would they help to secure development (per paragraph 160(b) of the NPPF)?

Matter 11- Environmental Quality

Issue (i) Whether the Plan's approach to flood risk and water resources is consistent with national policy, effective and justified?

Strategic Flood Risk Assessment (SFRA) (CEQ11, LPA44, LPA45)

Q.11.1.1 Is the SFRA based on a robust methodology and is the Plan informed by its findings (per paragraph 166 of the NPPF)?

Policy CE6

Q.11.1.2 Is Policy CE6 consistent with national policy in terms of directing development away from areas at highest risk (per NPPF paragraph 165), and is the approach to the development of previously-developed land in Flood Zone 3b justified and consistent with national policy?

Policy CE7

Q.11.1.3 Is Policy CE7 justified and consistent with national policy in the context of the 'Housing Optional Technical Standards' PPG?

Q.11.1.4 Would the Policy be effective in securing the high water efficiency standards sought for all new dwellings, and what mechanisms would be used to secure this?

Q.11.1.5 In the context of Approved Document G of the Building Regulations 2010, is the application of tighter standards to all new homes including those arising through sub-division of existing dwellings justified and effective?

Q.11.1.6 Is it justified for the Policy to require compliance with "any future tighter standard that may replace this", and is it clear what the source of any such standard may be?

Water Cycle Study (LPA46)

Q.11.1.7 Does the Councils' Water Cycle Study provide a justified basis for the Plan in general and Policy CE8 in particular?

Policy CE8

Q.11.1.8 Are Policy CE8's requirements justified, are the measures sought relevant to planning and capable of being controlled by conditions or other means and thus effective?

Q.11.1.9 Does the Policy's requirement relating to water efficiency unnecessarily duplicate Policy CE7?

Issue (ii) Whether the Plan's approach to ground conditions, air quality and pollution is consistent with national policy effective and justified

Policy CE9

Q.11.2.1 Is the approach to air quality justified and is it informed by any local air quality action plans?

Q.11.2.2 Is Policy CE9's requirement for developments to enhance air quality consistent with national policy which expects plans to identify opportunities to improve air quality or mitigate impacts (NPPF paragraph 192)?

Policy CE10

Q.11.2.3 Are the Policy's requirements justified and would they allow for an effective approach to consideration of development proposals adjacent to trunk roads and other locations where noise and air quality may be issues?

Q.11.2.4 Are the Policy's requirements relating to hazardous substances and nuclear sites justified and consistent with national policy and the PPG?

Q.11.2.5 Paragraph 4.58 sets out considerations relating to development adjacent to sewage treatment works and pumping stations. Does locating these considerations in the supporting text result in a clear and unambiguous policy position? Are the requirements justified?

Policy CE11

Q.11.2.6 Is the Policy justified including in terms of the scale of development that it applies to and its potential viability implications?

Q.11.2.7 Is the Policy's requirement for development to satisfy requirements in the South Oxfordshire and Vale of White Horse Lighting Design Guidance (CEQ07) justified?

Policy CE12

Q.11.2.8 Are the Policy's requirements relating to agricultural land justified, effective and consistent with national policy? Is it evident to a decision-taker how to react to development proposals relating to best and most versatile agricultural land?

Q.11.2.9 Is the Policy's approach to contaminated land and land stability justified, effective and consistent with national policy?

(No questions on Policy CE13)

MATTER 12 – JOBS AND TOURISM

Issue – Whether the Plan helps to create the conditions in which business can invest, expand and adapt?

Policy JT1

Q.12.1.1 Are the sources of supply identified in JT1 (including carried forward allocation JT1 g) justified and deliverable over the Plan period?

Q.12.1.2 Are any main modifications (along the lines of the Councils' suggested modifications MM10 and MM11) needed to the sources of supply in order to achieve soundness?

Policy JT2

Q.12.1.3 Is Policy JT2's approach to existing employment sites justified, would it provide an effective basis for decision-making, and is it consistent with national policy insofar as making effective use of land is concerned, and in terms of being flexible enough to accommodate needs not anticipated in the Plan (NPPF paragraph 86 and section 11)?

Q.12.1.4 Are the viability aspects of Policy JT2 and its reasoned justification justified and would it be clear and unambiguous to a decision-maker how to respond to development proposals that are supported by viability information?

Policy JT3

Q.12.1.5 Are the requirements for affordable workspace justified and have their viability implications been appropriately considered?

Q.12.1.6 What is the intended status of and timetable for production for the affordable workspace strategy? Is the Policy effective in the absence of this strategy?

Policy JT4

Q.12.1.7 What is the justification for the scale of development that the requirement for a Community Employment Plan would apply to?

Policy JT5

Q.12.1.8 Is Policy JT5 consistent with national policy on supporting a prosperous rural economy (NPPF paragraphs 88 to 89)?

Q.12.1.9 Is the requirement for development to have minimal impact on local communities justified and consistent with paragraph 89 of the NPPF?

Q.12.1.10 Is the requirement for submission of a business plan to support such applications justified and consistent with national policy?

Q.12.1.11 NPPF (paragraph 54) states that planning conditions should not be used to restrict national permitted development rights unless there is a clear justification to do so. Is Policy JT5 consistent with this?

Policy JT6

Q.12.1.12 Is Policy JT6 justified and consistent with national policy in terms of the level of impacts that would be tolerated and in terms of locations considered suitable for tourism and visitor development?

Policy JT7

Q.12.1.13 Are the requirements for marketing to support changes of use away from visitor accommodation justified and consistent with the NPPF in terms of making effective use of land?

MATTER 13 – TOWN CENTRES AND RETAIL

Issue – Does the Plan support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation?

Q13.1.1 How was the centre hierarchy set out at Policy TCR1 derived? Does the hierarchy reflect the role and function of the respective centres?

Q13.1.2 Is the approach to retail and main town centre uses set out at Policy TCR2 consistent with paragraphs 91-95 of the Framework?

Q13.1.3 How have the thresholds above which proposals for retail or leisure uses which are not within a defined centre, set out at Policy TCR2 (3a/b) been derived? Are they justified and effective?

Q13.1.4 Are the town centre and primary shopping area boundaries set out at Policy TCR2 and as shown on the Policies Map justified and effective?

Q13.1.5 Does the Town Centres and Retail Study (HES22/HES22.1/HES22.2) provide a robust basis for the assessment of quantitative and qualitative need for convenience and comparison floorspace in the respective Districts?

Q13.1.6 Is the approach to retail floorspace provision set out at Policy TCR3 consistent with the findings of the Town Centres and Retail Study?

Q13.1.7 Is the approach to retail and service provision in villages and local centres (Policy TCR4) justified, effective and consistent with national policy?

Q13.1.8 Are the thresholds above which a retail impact assessment will be required set out at Policy TCR4 2 justified, effective and consistent with national policy?

Q13.1.9 Is the Councils' suggested MM14 necessary for soundness?

MATTER 14 – DESIGN

Issue – Does the Plan set out a clear design vision and expectations?

Q14.1.1 Does Policy DE1 set out a clear design vision and expectations and provide certainty as to what is likely to be acceptable in accordance with paragraph 132 of the Framework?

Q14.1.2 Is Policy DE1 clearly written and unambiguous so it is evident how a decision maker should react to development proposals in accordance with paragraph 16 d) of the Framework?

Q14.1.3 Does Policy DE1 serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area consistent with paragraph 16 f) of the Framework?

Q14.1.4 Is Policy DE2 consistent with paragraph 135c of the Framework which seeks to ensure that planning policies are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change?

Q14.1.5 What status do the Chilterns Building Design Guide and the North Wessex Downs Colour Guide set out at Policy DE2 3 and 4 respectively have?

Q14.1.6 Is Policy DE3 consistent with paragraph 16 f) of the Framework which seeks to avoid unnecessary duplication of policies?

Q14.1.7 Is it necessary for Policy DE3 to include requirements for assessments such as master plans, design codes and design and access statements or other information to be submitted with planning applications?

Q14.1.8 Is the approach to community engagement in parts 4-6 of Policy DE3 consistent with paragraph 134 of the Framework?

Q14.1.9 Is it clear to readers of the policy when a proposal would be subject to a design review? (Policy DE3 7)

Q14.1.10 Is Policy DE3 clearly written and unambiguous so it is evident how a decision maker should react to development proposals in accordance with paragraph 16 d) of the Framework?

Q14.1.11 Is the approach to optimising densities set out at Policy DE4 justified, based in evidence and consistent with paragraph 128 of the Framework?

(No questions on Policies DE5, DE6 or DE7)

MATTER 15 – HEALTHY PLACES

Issue – Would the Plan provide a justified and effective basis for achieving healthy, inclusive and safe places which is consistent with national policy?

Q15.1.1 Does the Health Impact Assessment (HIA) (CSD07/CSD07.1) provide a robust basis for the assessment of the potential health implications of the Plan? How has the HIA informed the preparation of the Plan?

Q15.1.2 Is it justified for Policy HP1 to require a Health Impact Assessment to be submitted for major development proposals?

Q15.1.3 Does Policy HP2 provide a justified and effective basis for the consideration of proposals resulting in the loss of community facilities and services and proposals for new community facilities and services?

Q15.1.4 Does Policy HP3 provide a justified and effective basis for the consideration of new health care facilities and the loss of existing facilities?

Q15.1.5 Do the Leisure and Playing Pitch Strategies (HPL04.3/HPL04.4) provide a robust basis for the consideration of open space, sport and recreation proposals and proposals which affect open space, sport and recreational facilities?

Q15.1.6 Does Policy HP4 provide an effective basis for the protection and enhancement of existing open space, sport and recreation facilities?

Q15.1.7 Is Policy HP5 clear as to the circumstances in which new residential developments would be required to provide either on-site provision, the enhancement of existing facilities or a financial contribution to off-site provision of sport, physical activity and recreation facilities? Is it clear how financial contributions towards off-site provision or long-term maintenance of such facilities would be calculated?

Q15.1.8 Does Policy HP6, together with the supporting evidence (Green Infrastructure Strategy and Open Space Study (HPL02)) provide a justified and effective framework for the provision of green infrastructure on new developments?

Q15.1.9 Is Policy HP7 clear as to the circumstances in which development proposals would be required to provide either on-site provision, the enhancement of existing facilities or a financial contribution towards off-site provision of open space?

Is it clear how financial contributions towards off-site provision or long-term maintenance of such facilities would be calculated?

Q15.1.10 Is Policy HP8 clear as to the circumstances in which development proposals would be required to provide either on-site provision, the enhancement of existing facilities or a financial contribution towards off-site provision of children's play and spaces for young people? Is it clear how financial contributions towards off-site provision or long-term maintenance of such provision would be calculated?

Q15.1.11 Is part 7 of Policy HP8 requiring developers of large-scale major development sites to undertake an assessment of existing play facilities in the surrounding area justified?

Q15.1.12 Is the requirement in Policy HP9 for major residential proposals to make provision of, or a contribution towards community food growing opportunities justified by the evidence and effective?

Q15.1.13 Is Policy HP9 clear as to the circumstances in which development proposals would be required to provide either on-site provision, the enhancement of existing facilities or a financial contribution towards off-site provision of community food growing opportunities? Is it clear how financial contributions towards off-site provision or long-term maintenance of such facilities would be calculated?

Q15.1.14 What is the evidential basis for the minimum 10m buffer zone along both sides of a watercourse set out in part 2 of Policy HP10?

Q15.1.15 Does Policy HP10 provide a justified and effective framework for the consideration of proposals for development which affect watercourses which is consistent with national policy?

MATTER 16 – NATURE RECOVERY, HERITAGE AND LANDSCAPE

Issue (i)– Does the Plan make sufficient provision for conservation and enhancement of the natural environment?

Q16.1.1 Does the Plan take into account the findings of the Habitats Regulations Assessment and are any main modifications needed to address these findings?

Policy NH1

Q16.1.2 Does Policy NH1 distinguish between the hierarchy of international, national and locally designated sites and promote their conservation, restoration and enhancement in an effective and justified way?

Q16.1.3 Does the Policy unnecessarily duplicate other policies/legislation relating to protected sites?

Q16.1.4 Would it be clear to a decision-maker what 'future changes' to designations may be in the scope of criterion (4) and is inclusion of this consideration justified?

Q16.1.5 Is the Policy's approach to lowland fens justified and effective?

Policy NH2

Q16.1.6 Is the Plan's approach to Biodiversity Net Gain justified and consistent with the 'Biodiversity Net Gain' PPG Paragraph: 006 Reference ID: 74-00620240214) in terms of need, opportunities and viability?

Q16.1.7 Is the sequential approach to off-site provision of Biodiversity Net Gain justified and consistent with the advice of the PPG?

Q16.1.8 Are the requirements for features to support wildlife justified and would the Policy be effective in securing these measures?

Q16.1.9 Are suggested MM12 and MM15 necessary for soundness and would their requirements be justified and consistent with national policy?

Policy NH3

Q16.1.10 Are the requirements for a net gain in canopy cover where retention is not possible justified, and is the Policy consistent with the reasoned justification at paragraph 12.24 on this matter and thus effective?

Issue (ii) – Does the Plan make sufficient provision for the conservation and enhancement of landscapes

Policy NH4

Q16.2.1 Does the Plan reflect the great weight to be given to the conservation and enhancement of scenic beauty in the Chilterns and North Wessex Downs National Landscapes?

Q16.2.2 Does Policy NH4 unnecessarily duplicate national policy relating to National Landscapes?

Q16.2.3 Is the Policy clear as to the type and scale of proposals that would need to be supported by a landscape and visual impact assessment?

Policy NH5

Q16.2.4 Does the Valued Landscapes Assessment provide a proportionate evidential basis to support the designation of the District-valued landscapes?

Q16.2.5 Is the extent of the District-valued landscapes clear and are their boundaries justified?

Q16.2.6 Taken together would the extent of the District-valued landscapes and the expectations of Policy NH5 be consistent with other allocations and designations in the Plan and thus provide an effective basis for decision making?

Q.16.2.7 Does the Policy appropriately identify the special characteristics of District-valued landscapes (per 'Natural environment' PPG Paragraph: 036 Reference ID: 8-036-20190721 Revision date: 21 07 2019)? And would the Policy's reference to the Joint Local Plan Valued Landscapes Assessment (or subsequent update) be consistent with this aspect of PPG and justified?

Q.16.2.8 Are the requirements relating to special characteristics and significance consistent with national policy on landscapes and the intrinsic character and beauty of the countryside (per paragraph 180 NPPF)?

Policy NH6

Q.16.2.9 Is the Policy's requirement relating to landscape and visual impact assessment justified and is it clear which proposals this would apply to?

Q.16.2.10 Is the requirement to 'preserve' settlement character and setting justified and consistent with national policy?

Q.16.2.11 Does the Policy unnecessarily duplicate other aspects of the Plan such as Policy NH3?

Policy NH7

Q.16.2.12 Does the Tranquillity Assessment provide a proportionate evidential basis for the identification of tranquil areas that have remained relatively undisturbed by noise?

Q.16.2.13 Is the Policy consistent with the NPPF paragraph 191 (b) insofar as it requires protection and *enhancement* of features that contribute positively to tranquillity? Is any divergence from national policy on this issue justified?

Q.16.2.14 Is the Policy's reference to visual impact justified and consistent with national policy which describes tranquil areas as those 'relatively undisturbed by noise'?

Q.16.2.15 Is the Policy clear in terms of the scope of 'direct and indirect' impacts?

Issue (iii)-Does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment?

Q.16.3.1 Are the historic environment policies of the Plan consistent with national policy and statutory duties relating to these matters, and do they avoid unnecessary duplication?

Q.16.3.2 Are Plan policies that seek conservation *and* enhancement of the significance of heritage assets justified and consistent with national policy?

Policy NH8

Q.16.3.3 Is the Policy justified insofar as the methods for identifying non-designated heritage assets are concerned, is it clear what ‘any local criteria’ might be, and would the Policy provide an effective basis for decision-making relating to such assets in a manner consistent with national policy?

Policy NH9

Q16.3.4 Is the Policy clear and justified in terms of investigation and recording of fabric, features, objects, or remains both known and *unknown* (with our emphasis)?

There are no specific questions on Policies NH10, NH11, NH12 and NH13

MATTER 17 – INFRASTRUCTURE, TRANSPORT, CONNECTIVITY AND COMMUNICATIONS

Issue – Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to infrastructure, transport, connectivity and communications?

Q.17.1.1 Are the infrastructure, transport, connectivity and communications policies of the Plan based on robust evidence?

Q17.1.2 Does the Infrastructure Delivery Plan (CSD05.1) contain the full range of infrastructure necessary to support the development proposed in the Plan? Are there any projects/requirements which should be included?

Q17.1.3 A number of infrastructure projects/requirements associated with specific sites set out in Appendices 2.1 do not have an estimated cost. When will these costs be identified?

Q17.1.4 How will the IDP respond to changing circumstances?

Q17.1.5 Does Policy IN1 give sufficient guidance to developers in terms of infrastructure and service provision required to support new developments?

Q17.1.6 Does Policy IN2 provide a justified and effective framework to actively manage patterns of growth which promote active and sustainable travel opportunities, minimise the need to travel by car and offer a genuine choice of transport modes?

Q17.1.7 Does Policy IN2 provide an effective framework to ensure that the potential impact of development on the transport network and other potential impacts can be addressed?

Q17.1.8 Is it necessary to set out at parts 3 and 4 of Policy IN2 the transport documents necessary to support planning applications?

Q17.1.9 What status do the 'pipeline' schemes identified at part 1 of Policy IN3 have? Are they included in the IDP?

Q17.1.10 How were the safeguarded schemes identified that are set out at parts 7 of Policy IN3? For schemes which have been carried forward, have they been subject to a thorough review process? Is the approach to safeguarded schemes consistent with paragraph 110 b of the Framework?

Q17.1.11 What is the current status of the Cowley Branch Line? Should it be included in Policy IN3?

Q17.1.12 What is the current status of the Third Thames Crossing?

Q17.1.13 Does Policy IN4 provide a sufficiently robust basis for the safeguarding, restoration and reconstruction of the Wilts and Berks Canal?

Q17.1.14 How was the 30m wide protected corridor for the canal and associated infrastructure (where the width is not currently defined) set out at part 2 c of Policy IN4 derived?

Q17.1.15 Is Policy IN5 consistent with paragraph 111 and 112 of the Framework? What is the status of Oxfordshire County Council's adopted parking standards?

Q17.1.16 What is the background to the South East Reservoir Option (SESRO) as safeguarded by Policy IN7? How has the extent of the safeguarded land been defined?

There are no questions relating to Policy IN6 or Policy IN8

MATTER 18 – VIABILITY

Issue – Taking account of the cumulative scale of Community Infrastructure Levy (CIL), obligations and policy requirements, is the Plan deliverable?

18.1.1 Is the methodology of the Viability Report (2024) consistent with the ‘Viability’ PPG and have the cumulative implications of the Plan’s policy requirements been adequately taken into account?

18.1.2 Have the Viability Report (2024) and predecessor documents been subject to consultation/stakeholder engagement to ‘sense check’ the assumptions and approach used? How has any feedback been taken into account?

18.1.3 Are the Viability Report’s appraisal assumptions justified?

MATTER 19 -MONITORING

Issue –Whether the Monitoring and Review framework for the Local Plan is justified, effective and consistent with national policy?

19.1.1 Does the Monitoring and Review framework provide an effective basis for monitoring all policies in the Plan?

19.1.2 Are the proposed monitoring indicators measurable?

19.1.3 How will the implementation of the Plan be monitored in terms of its effectiveness and unintended consequences?

19.1.4 Are clear contingency measures in place to address any issues arising from the monitoring process, such as non-delivery or lower than anticipated delivery of housing and employment allocations in the Plan? Are the triggers for such measures effectively identified?

End